



FORMER JOHN LEWIS DEPOT, LETCOMBE STREET, READING
(ALSO KNOWN AS JLP MILL LANE)

DAYLIGHT/SUNLIGHT ASSESSMENT
AUGUST 2024





DAYLIGHT AND SUNLIGHT

IMPACT ON NEIGHBOURING PROPERTIES REPORT

Former John Lewis Depot, Letcome Street, Reading

John Lewis Partnership BTR Ltd

FQ0007417

GIA No: **20000**

PROJECT DATA:

Client	John Lewis Partnership BTR Ltd
Architect	CJCT Studios
Project Title	Former John Lewis Depot, Letcome Street, Reading
Project Number	20000

REPORT DATA:

Report Title	Impact on Neighbouring Properties Report
GIA Department	Daylight Department
Dated	10th May 2024
Prepared by	JC
Checked by	JC
Type	FINAL

Revisions	No:	Date:	Notes:	Signed:
	03	15/05/2024	Final report	JC

SOURCES OF INFORMATION:

Information Received	IR-15-20000
Release Number	Rel_08_20000_01
Issue Number	01
Site Photos	Google
GIA Survey	PC01/PC02
3D models	GIA surveys
OS Data	FIND Maps

DISCLAIMER:

N.B This report has been prepared for John Lewis Partnership BTR Ltd by GIA as their appointed Daylight & Sunlight consultants. This report is intended solely for John Lewis Partnership BTR Ltd and may contain confidential information. No part or whole of its contents may be disclosed to or relied upon by any Third Parties without the express written consent of GIA. It is accurate as at the time of publication and based upon the information we have been provided with as set out in the report. It does not take into account changes that have taken place since the report was written nor does it take into account private information on internal layouts and room uses of adjoining properties unless this information is publicly available.



CONTENTS

1	EXECUTIVE SUMMARY	2
2	THE SITE & PROPOSED DEVELOPMENT	4
3	POLICY & GUIDANCE	6
4	DAYLIGHT & SUNLIGHT IMPACTS TO NEIGHBOURING PROPERTIES	8
5	CONCLUSIONS	22

APPENDICES (BOUND SEPARATELY)

- APPENDIX 01
PRINCIPLES OF DAYLIGHT, SUNLIGHT, OVERSHADOWING AND PHOTOVOLTAICS
- APPENDIX 02
DRAWINGS
- APPENDIX 03
ASSUMPTIONS
- APPENDIX 04
RESULTS & CONTOURS

1 EXECUTIVE SUMMARY

GIA have assessed the CJCT Studios scheme at the Former John Lewis Depot at Letcombe Street, Reading to understand the potential changes in light to the relevant sensitive receptors.

- 1.1 GIA have been instructed by John Lewis Partnership BTR Ltd to advise on impacts to daylight and sunlight in relation to the proposal at the Former John Lewis Depot site in Letcome Street, Reading.
- 1.2 The scheme is located within the administrative area of Reading Borough Council and seeks to demolish the existing building and erect a new building consisting of up to 215 build to rent residential dwellings.
- 1.3 GIA have undertaken technical assessments on daylight and sunlight to understand the potential effect of the development on the amenity of the relevant neighbouring receptors.
- 1.4 The technical analysis has been considered by reference to the criteria and methodology within the Building Research Establishment Guidance (BR209, 2022) which when published, recognised that it *"is advisory and the numerical target values within it may be varied to meet the needs of the development and its location"*¹.
- 1.5 The approach to be taken to daylight and sunlight issues has been considered carefully by a number of recent appeal decisions from the Inspectorate. A two-stage process is to be adopted. This was examined more recently at the appeal at Goldsworth Road, Woking with the Inspector fully endorsing the two stage approach (PINS Ref: APP/A3655/W/21/3276474) which stems from the High Court decision on the application of Melanie Rainbird and The Council of the London Borough of Tower Hamlets².
- 1.6 The key headlines from the relevant policy documents are summarised in Section 3 of this report.
- 1.7 Upon successful completion of the Proposed Development 21 of the 27 neighbouring properties the site will meet the BRE Guidelines.
- 1.8 The overall daylight and sunlight results are outlined below:
 - Of the 364 windows assessed for VSC, 291

(80%) will meet the BRE Guidelines.

- Of the 26 rooms assessed for NSL, 26 (100%) will meet the BRE Guidelines. Note that as advised within the BRE guidelines, the NSL assessment has only been run where room layouts are known and floor plans were located for a limited number (5) of neighbouring properties.
- Of the 182 windows assessed for APSH 181 (99%) will meet the BRE Guidelines.

- 1.9 The Reading Local Plan 2019 suggests in Policy CC8 that there should not be a detrimental impact on the living environment of existing residential properties in terms of access to daylight and sunlight. The Local Plan also outlines that it will apply the BRE Guidelines flexibly within the town centre.

- 1.10 Our technical analysis demonstrates that a number of windows will experience noticeable alterations in relation to daylight (VSC). However in the vast majority of cases, the alteration occurs to a less sensitive property, the alterations are small, or the retained levels of VSC are commensurate with those that have been considered reasonable in recent appeal decisions Further, the scheme remains over 99% compliant with regards to sunlight impacts.

- 1.11 Whilst some of the alterations in daylight may be noticeable we do not believe the impacts will be detrimental to neighbouring occupants.

- 1.12 This report is supported by drawings and results which are all enclosed within the Appendices as listed on the Contents Page. All assumptions used in collating this report can be found in Appendix 03.

¹ Littlefair, P. (2022). Site Layout Planning for Daylight and Sunlight – A Guide to Good Practice. Hertfordshire: HIS BRE Press, p 85 para F1

² Rainbird, R (on the application of) v The Council of the London Borough of Tower Hamlets [2018] EWHC 657 (Admin) (28 March 2018)



Figure 01: VU.CITY image with Proposed Development in context

2 THE SITE & PROPOSED DEVELOPMENT

GIA have been instructed to review and advise on the daylight and sunlight impacts associated with the implementation of the proposed development at Former John Lewis Depot, Letcome Street, Reading.

THE SITE

- 2.1 The site itself is bound by Mill Lane and the A329 to the north, Letcombe Street to the south-west and Crossland Road to the south-east, from which the Site is accessed. The site currently comprises the existing JLP warehouse building with associated car parking and servicing areas to the north-east and south-west of the building.
- 2.2 By reference to Policy CR1 of the Reading Borough Local Plan 2019, the site is located with Central Reading.

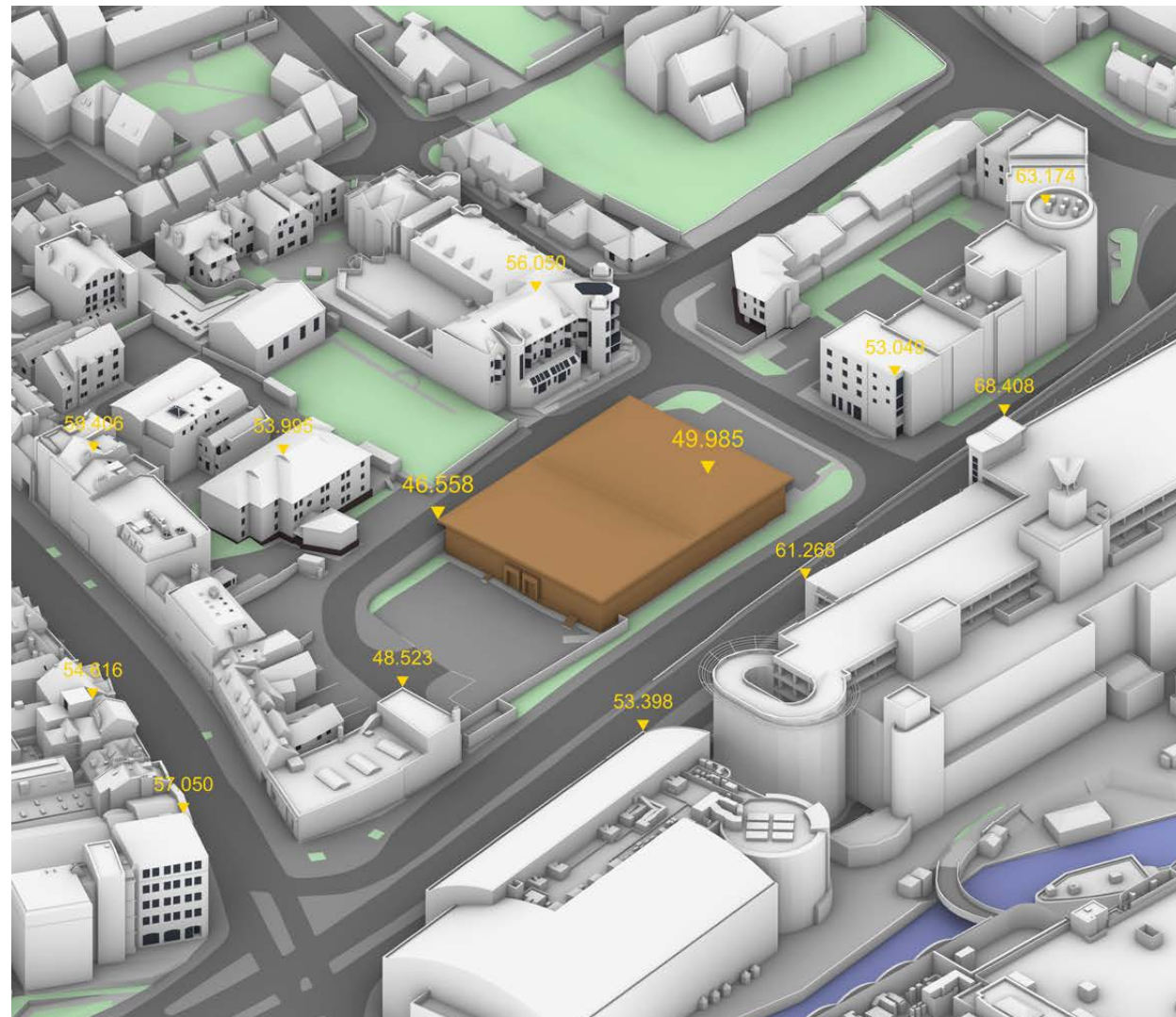


Figure 02: 3D model of existing site

PROPOSED DEVELOPMENT

- 2.3 The proposal seeks to implement the following:
Demolition of the existing building and redevelopment of the site comprising erection of a new building for up to 215 build to rent residential dwellings (Use Class C3) together with flexible commercial / community space (Use Class E/F1/F2), residents' facilities, landscaping, public realm, amenity space, cycle parking and disabled car parking.
- 2.4 Figure 04 below illustrates the proposed development within the surrounding context. Further images can be seen in Appendix 02.

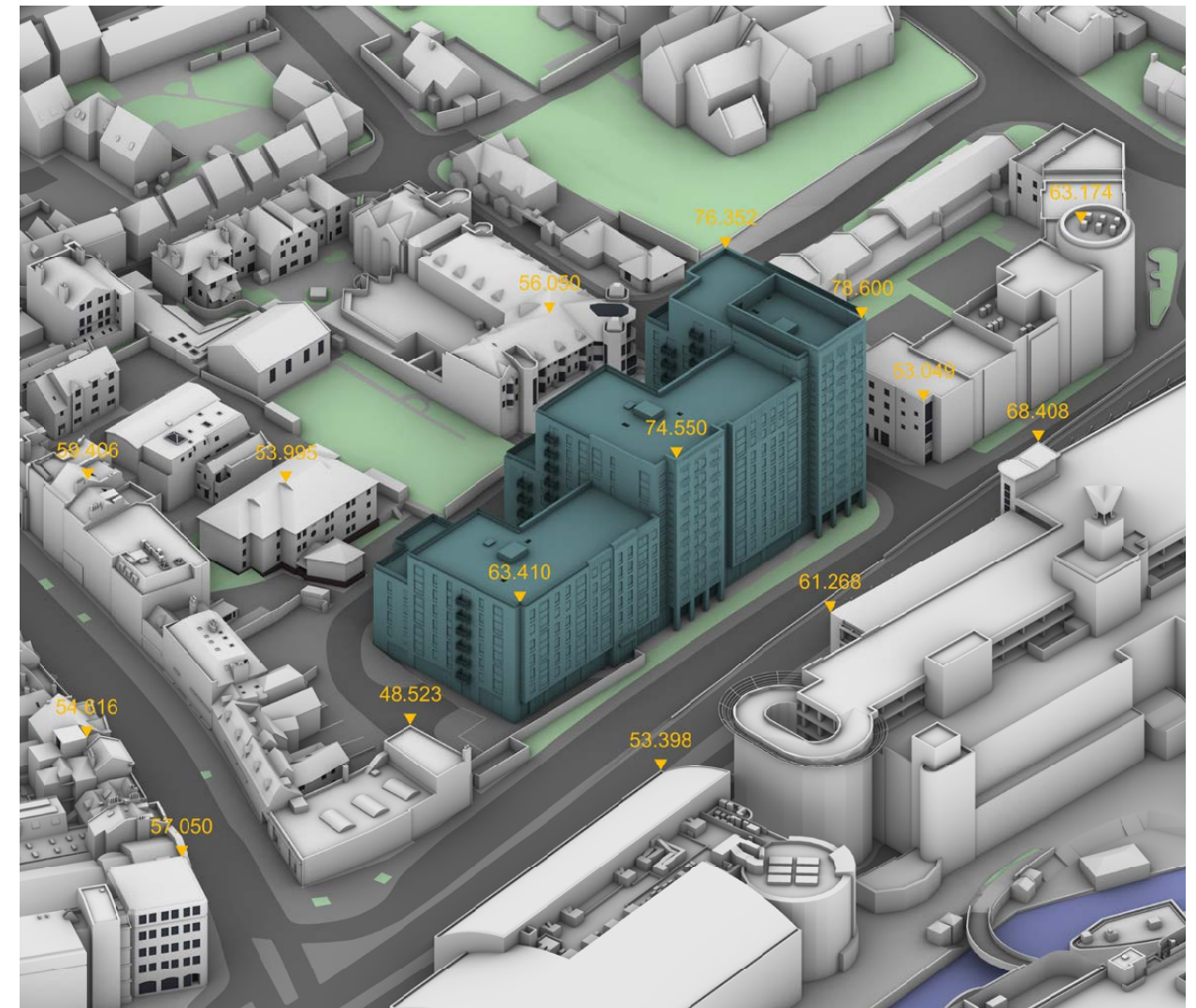


Figure 03: 3D model of the proposed scheme

3 POLICY & GUIDANCE

This section details the relevant policy and guidance for daylight and sunlight amenity including overshadowing.

3.1 Outlined below are sections from the following documents which are considered to be the most pertinent in relation to daylight and sunlight matters and how the effects of the Proposed Development on relevant neighbouring properties have been approached:

- National Planning Policy Framework (December 2023);
- Planning Practice Guidance (February 2024);
- Building Research Establishment Guidelines 2022.
- Reading Borough Local Plan (November 2019)

3.2 The key headlines from each of the documents can be summarised as follows:

1 The NPPF highlights the Government’s recognition that increased flexibility is required on daylight and sunlight in response to the requirement for higher density development. By stating that:

“when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards)”¹ (our emphasis).

2 The PPG outlines that all developments should:

“maintain acceptable living standards” and that assessing appropriate daylight and sunlight amenity “will depend to some extent on context”².

3.3 The Reading Borough Local Plan 2019 contains Policy CR1 which defines Central Reading. The development site is located within this defined area.

3.4 The 2019 Local Plan suggests in paragraph 5.3.49 that the BRE Guidelines are used to consider the daylight and sunlight impacts caused developments. The Local Plan states that in the town centre (within which the site is located) it will apply the BRE guidelines flexibly:

“In terms of effects of developments, the Building Research Establishment (BRE)¹¹⁰

has guidelines on assessing daylight and sunlight effects of development, which the Council will apply flexibly given the high density of the central area.”

3.5 The 2019 Local Plan in Policy CC8 states that Development will not:

“cause a detrimental impact on the living environment of existing residential properties or unacceptable living conditions for new residential properties, in terms of access to daylight and sunlight.”

3.6 Finally, the BRE Guidelines 2022 offer a numerical methodology to calculate changes in daylight and sunlight condition and are widely used in the industry. The key criteria within the BRE (Vertical Sky Component “VSC”, No Sky Line “NSL” and Annual Probable Sunlight Hours “APSH”) have been used to understand and compare the existing and retained levels of light once the Proposed Development has been implemented. A summary of the BRE Guidelines 2022 are provided within Appendix 01.

1 MHCLG. (2023). National Planning Policy Framework (2023), p 38, para 129(c)
2 MHCLG. (2019). National Planning Policy Guidance (2019), para 66-007-20190722

4 DAYLIGHT & SUNLIGHT IMPACTS TO NEIGHBOURING PROPERTIES

This section details the daylight and sunlight impacts in relation to the relevant properties neighbouring the Site.

MODELLING

- 4.1 A three-dimensional computer model of the Site and surrounding properties was produced based on a 3D survey carried out on 8th February 2024. Where available, floor plans of the relevant properties have been included and this context model has been used to carry out the technical assessments. All relevant assumptions made in producing this model can be found in Appendix 03.

TWO-STAGE APPROACH

- 4.2 The impacts to relevant neighbouring properties have been considered in two stages:

Stage 1 - Is there a strict compliance with the BRE Guidelines?

- The national numerical assessments for daylight and sunlight as outlined in the BRE Guidelines are applied. These assessments are discussed in Appendix 01 of this report. Where properties, windows and/or rooms meet the recommendations of the BRE Guidelines, these are not discussed further.

Stage 2 - Is the daylight and sunlight impact detrimental?

- We have considered the context of the BRE breaches such as the use of the properties, the retained levels of light and absolute change to take a view on whether losses are likely to be detrimental

RELEVANT NEIGHBOURING PROPERTIES

- 4.3 GIA have identified the following 26 properties as relevant for daylight and sunlight assessment. All results can be found in Appendix 04.:

- Saxon Court
- Townsend House
- Elizabeth Edgar Cottages
- 4 Church Street
- 6 Church Street
- Norfolk House
- 6b Church Street
- 6c Church Street
- 1-8 Folk House
- 2 Church Street
- 74-76 London Street

- 43 London Street
- 45 London Street
- 46 London Street
- 48 London Street
- 44 London Street
- 33 London Street
- 35-39 London Street
- 41 London Street
- 60 London Street
- 62-66 London Street
- 68 London Street
- 70 London Street
- 72a London Street
- 70a London Street
- 15 Deansgate Road
- 16 Deansgate Road

- 4.4 The 20 properties listed below will meet the numerical recommendations for VSC, NSL (where assessed) and APSH as set out within the BRE Guidelines (Stage 1).

- 4 Church Street
- 6 Church Street
- Norfolk House
- 6b Church Street
- 6c Church Street
- 1-8 Folk House
- 2 Church Street
- 74-76 London Street
- 43 London Street
- 45 London Street
- 48 London Street
- 44 London Street
- 33 London Street
- 35-39 London Street
- 41 London Street
- 62-66 London Street
- 68 London Street
- 70 London Street
- 72a London Street
- 70a London Street
- 15 Deansgate Road

- 4.5 The following properties do not meet the BRE Guidelines and are discussed in greater detail within this report. The properties can be located in Figure 04 overleaf.

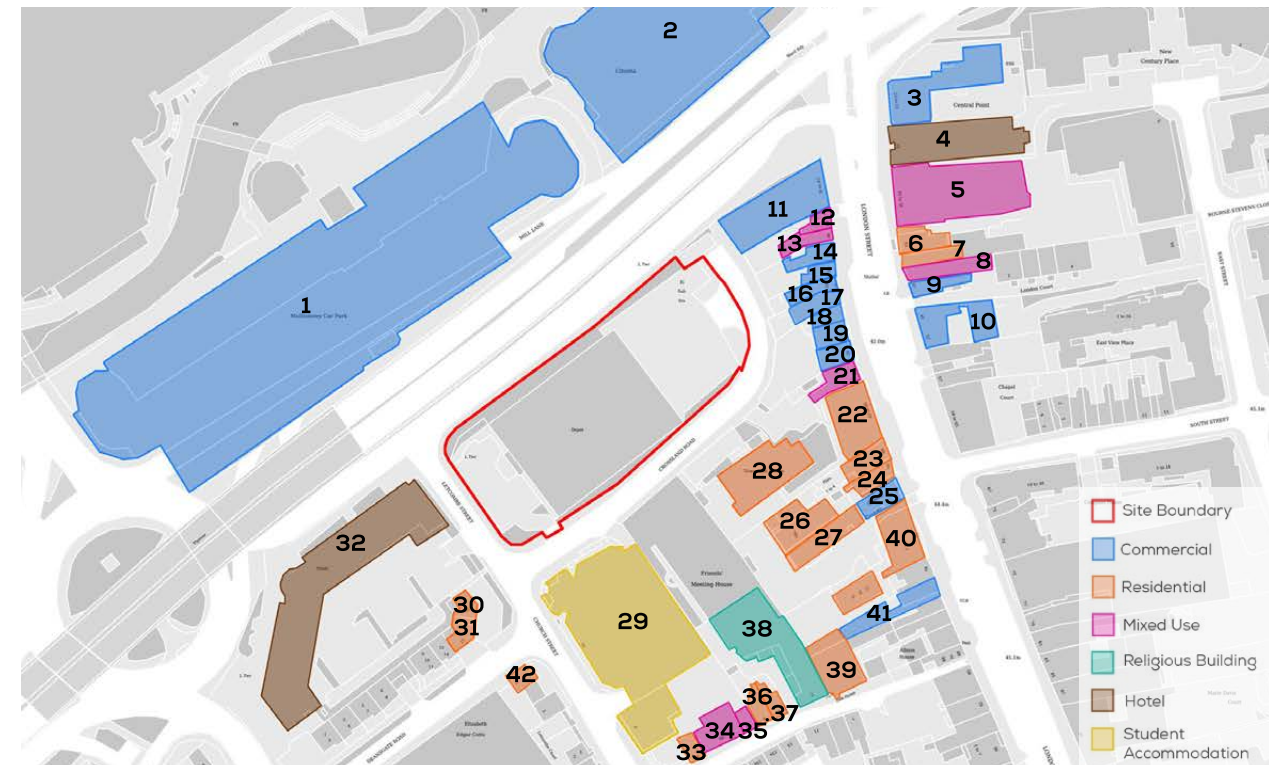


Figure 04: Property Use Map

- Saxon Court (Map ID 29)
- 16 Deansgate Road (Map ID 30)
- Townsend House (Map ID 29)
- Elizabeth Edgar Cottages (Map ID 42)
- 46 London Street (Map ID 13)
- 60 London Street (Map ID 21)

DISCUSSION OF RESULTS

- 4.6 In order to establish whether the Proposed Development will result in detrimental change in daylight and sunlight amenity (Stage 2), the following material considerations have been examined and applied (where relevant):

- If room layouts are unknown, then only the VSC methodology will be considered in line with paragraph 2.2.10 and Appendix D of the BRE Guidelines;
- Whether the larger BRE breaches are isolated.
- Where there are low existing VSC values, it has been reviewed whether the change in daylight will be perceptible to the occupant i.e. where there is less than an absolute 3% VSC reduction, it is GIA's opinion that this will not be perceptible; and

- 4 If the post-development retained VSC values are commensurate with the levels that have previously been considered reasonable in levels in urban environments (mid-teens). In a 2021 appeal in Woking: (APP/A3655/W/21/3276474) the planning inspectorate supported the approach of considering retained VSC levels. The inspectorate outlined that:

"Retaining a VSC level of 27% in neighbouring properties is unrealistic; as has been recognised in many appeal decisions and other documents. Even retaining 20% VSC is considered, generally, to be reasonably good, and in urban areas retaining around mid-teen % VSC is considered to be acceptable."

- 4.7 When considering the relevance of the inspectorates comments above, it should be noted the development site is situated within Central Reading, by reference to Policy CR1 of the Reading Local Plan 2019. We therefore would consider the site and surrounding locale to be urban.



SAXON COURT

- 4.8 This property is located to the south of the development site and is in use as student accommodation it is therefore not a primary residential property. Due to the transient use of the occupancy, Saxon Court could be considered as less sensitive to changes in daylight and sunlight.
- 4.9 The BRE Guidelines only make reference to student accommodation in terms of the daylight amenity to proposed schemes (paragraph C17) and no specific guidance is given in respect of impacts on neighbouring student accommodation and the treatment of existing student bedrooms.
- 4.10 We have not located floor plans for this property. We have made reasonable assumptions regarding the internal layouts of the rooms. It is understood that the building was initially designed to accommodate office space and was later re-purposed for student housing. As the property was not initially designed for residential occupation, the architecture of the building may contribute to some of the BRE breaches within the property.

Daylight

- 4.11 There are 51 windows, assumed to serve 12 rooms within the property that face the site. As we have not located detailed floor plans for the property we have not considered daylight distribution (NSL) and have considered VSC only for daylight.

- 4.12 Of the 51 windows assessed, 10 (20%) will meet the BRE Guidelines for VSC.
- 4.13 Of the 41 windows that experience a BRE breach, one will experience a loss between 20% and 29.9%, four will experience an alteration of 30%-39.9% and the remaining 36 windows will experience alterations of 40%-83.5%.
- 4.14 In terms of retained VSC, 19 of the 41 impacted windows will retain figures in the mid-teens and higher. Such retained VSC levels were considered reasonable in a 2021 appeal in Woking.
- 4.15 11 windows will retain values between 10% and 14.9% and the remaining 11 windows will retain VSC values in the single figures.

Sunlight

- 4.16 The property does not contain any windows that face the site and are orientated within 90 of due south. It is therefore not necessary to consider the property for sunlight (APSH).

Summary

- 4.17 The Reading Local Plan 2019 outlines that there must not be a detrimental impact on the living environment of existing residential properties in terms of access to daylight and sunlight.
- 4.18 It is our view that a number of the windows within Saxon Court will experience alterations in VSC that will be noticeable to an occupant. However, it

should be noted that the property consists of student accommodation which is generally only inhabited during term time, and the occupancy is transitory with the majority of occupants likely residing for less than one year. On the basis of the above, we do not believe that the alterations in natural light to this property will be detrimental to occupants.



16 DEANSGATE ROAD

- 4.19 This property is located to the south west of the development site and is residential in use.
- 4.20 We have not located floor plans for this property. We have made reasonable assumptions regarding the internal layouts of the rooms.

Daylight

- 4.21 There are 11 windows that are assumed to be serving seven rooms within the property that face the site. As we have not located detailed floor plans for the property we have not considered daylight distribution (NSL) and have considered VSC only for daylight.
- 4.22 Of the 11 windows assessed, four (36%) will meet the BRE Guidelines for VSC.
- 4.23 Of the seven windows that experience a BRE breach, six will experience an alteration of 30%–39.9% and the one remaining window will experience an alteration of 42%.
- 4.24 Of the seven windows that experience BRE breaches, one (F00/W1) experiences a low VSC of 1.4% in the existing baseline. This low value is due to the overhanging architecture on the first floor which limits existing daylight to the ground floor below. With such low existing VSC, it is likely that any material change over the site would cause skewed percentage changes to this window.
- 4.25 The remaining six windows experience existing VSC

values of 27%–33%. These high values are due to the low-rise nature of the existing development site. Once the scheme is in place, three of the windows retain VSC values of 21–23%. These values are just below the target value of 27% set out in the BRE guide. It should be noted however that the BRE guide is intended to be used flexibly within the whole of the UK, and it can be inferred from diagrams within the guide that the 27% figure is derived for suburban locales. As discussed in paragraph 4.7 above, retained VSC values of 20%+ have been considered to be good in recent planning appeals in the UK.

- 4.26 The remaining three windows experience VSC values in the mid-teens (15–17%). Such mid-teen values have been considered to be reasonable in urban areas within the UK in a 2021 Appeal in Woking.

Sunlight

- 4.27 The property does not contain any windows that face the site and are orientated within 90 of due south. It is therefore not necessary to consider the property for sunlight (APSH).

Summary

- 4.28 The Reading Local Plan 2019 suggests that there should not be a detrimental impact on the living environment of existing residential properties in terms of access to daylight and sunlight.
- 4.29 Our daylight analysis demonstrates that some windows within the property may experience noticeable changes in daylight as a result of the

proposed development. However, in consideration of the low rise nature of the existing site and the reasonable retained VSC values, we do not believe that the alterations in natural light will be detrimental to occupants.



TOWNSEND HOUSE

- 4.30 This property is located to the south east of the development site and is residential in use.
- 4.31 We have not located floor plans for this property. We have made reasonable assumptions regarding the internal layouts of the rooms.

Daylight

- 4.32 There are 47 windows that are assumed to be serving 29 rooms within the property that face the site. As we have not located detailed floor plans for the property we have not considered daylight distribution (NSL) and have considered VSC only for daylight.
- 4.33 It should be noted that the property currently faces onto an undeveloped part of the site which is occupied by a car park. The low-rise nature of the existing site means that in the current scenario the majority of windows experience very high VSC values, with the mean VSC across the building being 30.4%. This means any material change in massing over the site is likely to cause large alterations in VSC.
- 4.34 Of the 47 windows assessed, 26 (55%) will meet the BRE Guidelines for VSC.
- 4.35 Of the 21 windows that experience a BRE breach, 11 will experience alterations of between 20% and 29.9%. If these alterations were to be considered within an Environmental Impact Assessment (EIA) they would be listed as minor adverse.

- 4.36 Nine remaining windows will experience an alteration of 30%-39.9% and one window will experience an alteration of 100%+. These alterations would be considered Moderate and Major adverse respectively within an EIA.
- 4.37 It should be noted that the one window that will see an alteration of 100% experiences a very low existing VSC of just 0.1% due to its location directly opposite an annex of the property that appears to house utilities. The absolute alteration in VSC to this window is just 0.1%. This change would not be perceptible to an occupant.
- 4.38 When considering the remaining 20 windows that experience a BRE breach, 18 retain VSC levels greater than 21%. These values are below the target of 27% set out in the BRE guide. However, as discussed in paragraph 4.7, such values have been considered good for an urban area in a 2021 appeal in Woking.
- 4.39 The remaining two windows retain mid and high-teen values of 15% and 19% VSC. Comparable retained VSC values have been considered to be reasonable in recent appeal decisions.

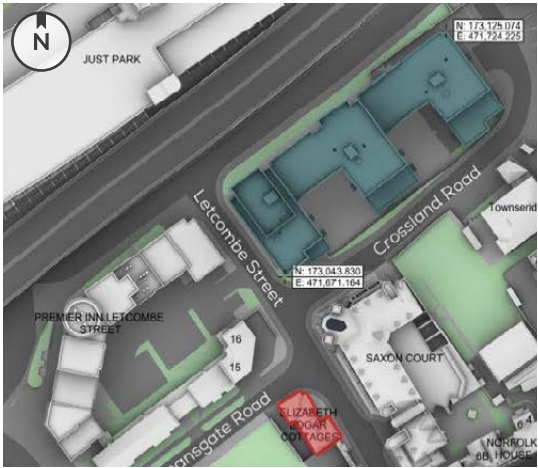
Sunlight

- 4.40 We have considered six windows for sunlight analysis (APSH). All six windows meet the BRE Guidelines for APSH.

Summary

- 4.41 The Reading Local Plan 2019 suggests that there

should not be a detrimental impact on the living environment of existing residential properties in terms of access to daylight and sunlight. Our daylight analysis demonstrates that a number of windows within the property will experience noticeable changes in daylight as a result of the proposed development. However, in consideration of the fact that the property currently faces an undeveloped part of the site and that the property on the whole retains good VSC values, we do not believe the alterations in natural light will be detrimental to occupants.



ELIZABETH EDGAR COTTAGES

4.42 These properties are located to the south of the development site and are residential in use. We have not located floor plans for this property. We have made reasonable assumptions regarding the internal layouts of the rooms.

Daylight

- 4.43 There are three windows that are assumed to be serving two rooms within the property that face the site. As we have not located detailed floor plans for the property we have not considered daylight distribution (NSL) and have considered VSC only for daylight.
- 4.44 Of the three windows assessed, one (33%) will meet the BRE Guidelines for VSC.
- 4.45 The windows that experience breaches will see small changes of 20.7% and 21.9%. These alterations are just over the 20% figure outlined in the BRE Guide and in our view are likely to be within the inherent flexibility of the guide.
- 4.46 One of the windows (W2/F00) will experience an absolute change of 2.5% which is small and may not be noticeable to an occupant.
- 4.47 The remaining window retains a VSC of 19% which has been considered as reasonable for an urban area in recent appeal decisions.

Sunlight

4.48 The property does not contain any windows that face the site and are orientated within 90 of due south. It is therefore not necessary to consider the property for sunlight (APSH).

Summary

- 4.49 The Reading Local Plan 2019 suggests that there should not be a detrimental impact on the living environment of existing residential properties in terms of access to daylight and sunlight.
- 4.50 Our daylight analysis demonstrates that two windows will experience technical BRE breaches regarding VSC. In consideration of the minor nature of the alterations we do not believe the alterations in natural light will be detrimental to occupants.

INTENTIONALLY BLANK PAGE



46 LONDON STREET

4.51 This residential property is located to the north east of the development site. We have not located floor plans for this property and have made reasonable assumptions regarding the internal layouts of the rooms.

Daylight

- 4.52 There are six windows that are assumed to be serving five rooms within the property that face the site. As we have not located detailed floor plans for the property we have not considered daylight distribution (NSL) and have considered VSC only for daylight.
- 4.53 Of the six windows assessed, four (67%) will meet the BRE Guidelines for VSC.
- 4.54 The windows that experience breaches will see small changes of 21% each. These alterations are just over the 20% figure outlined in the BRE Guide and in our view are likely to be within the inherent flexibility of the guide.
- 4.55 The windows will experience high retained VSC figures of 26% and 26.7% once the proposed development is in place. These values are just below the 27% figure outlined in the BRE guide.

Sunlight

4.56 The property does not contain any windows that face the site and are orientated within 90 of due



south. It is therefore not necessary to consider the property for sunlight (APSH).

Summary

- 4.57 The Reading Local Plan 2019 suggests that there should not be a detrimental impact on the living environment of existing residential properties in terms of access to daylight and sunlight.
- 4.58 Our daylight analysis demonstrates that two windows will experience small, technical BRE breaches regarding VSC. In consideration of the minor nature of the changes and the very high retained VSC figures, we do not believe the alterations in natural light will be detrimental to occupants.

INTENTIONALLY BLANK PAGE



60 LONDON STREET

4.59 This residential property is located to the east of the development site. We have not located floor plans for this property and have made reasonable assumptions regarding the internal layouts of the rooms.

Daylight

- 4.60 There are four windows that are assumed to be serving five rooms within the property that face the site. As we have not located detailed floor plans for the property we have not considered daylight distribution (NSL) and have considered VSC only for daylight.
- 4.61 Of the four windows assessed, all (100%) will meet the BRE Guidelines for VSC.

Sunlight

- 4.62 Of the four windows relevant for sunlight analysis (APSH) three (75%) will meet the BRE Guidelines.
- 4.63 The remaining window experiences an alteration in APSH of 25% and retained a value of 24%. This retained figure is just 1% less (in absolute terms) than the recommended value in the BRE Guide. The window experiences an alteration in Winter sunlight of 33%. The window retained a WPSH figure of 4% which is just less than the 5% figure recommended in the BRE Guide.

Summary

- 4.64 The Reading Local Plan 2019 suggests that there should not be a detrimental impact on the living environment of existing residential properties in terms of access to daylight and sunlight.
- 4.65 Our daylight analysis demonstrates that all windows will meet the BRE guidance for VSC. In terms of sunlight one window will experience a BRE transgression. In consideration of the VSC compliance and the minor nature of the isolated APSH breach, we do not believe the alterations in natural light will be detrimental to occupants.

INTENTIONALLY BLANK PAGE

5 CONCLUSIONS

GIA have undertaken a daylight and sunlight assessment in relation to the Proposed Development at Former John Lewis Depot, Letcome Street, Reading. The technical analysis has been undertaken in accordance with the BRE Guidelines.

- 5.1 GIA have completed a comprehensive technical analysis of the impact to daylight and sunlight produced by the Proposed Development at Letcombe Street in Reading.
- 5.2 When constructing buildings alterations in light to adjoining properties are often unavoidable and the numerical guidance given in the BRE document can be treated flexibly in consideration of site specifics.
- 5.3 The overall daylight and sunlight results are outlined below:
- Of the 364 windows assessed for VSC, 291 (80%) will meet the BRE Guidelines.
 - Of the 26 rooms assessed for NSL, 26 (100%) will meet the BRE Guidelines. Note that as advised within the BRE guidelines, the NSL assessment has only been run where room layouts are known and floor plans were located for a limited number (5) of neighbouring properties.
 - Of the 182 windows assessed for APSH 181 (99%) will meet the BRE Guidelines.
- 5.4 It is worth reiterating that the BRE's numerical guidance should be treated flexibly. Section 1.6 of the BRE states that; *"Although, it gives numerical guidelines, these should be interpreted flexibly since natural lighting is only one of many factors in site layout design"*.
- 5.5 The Reading Local Plan 2019 states in Policy CC8 that there should not be a detrimental impact on the living environment of existing residential properties in terms of access to daylight and sunlight. Policy CC8 outlines a number of other amenities that should not be detrimentally impacted, which reflects that there are multiple considerations that must be balanced against the benefits of the scheme. The Local Plan also outlines that it will apply the BRE Guidelines flexibly within the town centre.
- 5.6 Our technical analysis demonstrates that a number of windows will experience noticeable alterations in relation to daylight (VSC). However in the vast majority of cases either; the alteration occurs to a less sensitive property, the alterations are small, or the retained levels of VSC are commensurate with those that have been considered reasonable in recent appeal decisions Further, the scheme remains over 99% compliant with regards to sunlight impacts.
- 5.7 Whilst some of the alterations in daylight may be noticeable, we do not believe the impacts will be detrimental to neighbouring occupants.



For further details please contact us on:

LONDON

T 020 7202 1400

E mail@gia.uk.com

The Whitehouse
Belvedere Road
London SE1 8GA

MANCHESTER

T 0161 672 5100

E manchester@gia.uk.com

2 Commercial Street
Manchester
M15 4RQ

BELFAST

T 02892 449 674

E belfast@gia.uk.com

River House
48-60 High Street
Belfast BT1 2BE

BRISTOL

T 0117 374 1504

E bristol@gia.uk.com

33 Bristol
Colston Avenue
Bristol BS1 4UA

DUBLIN

T +353 (0)1270 9879

E hello@giasurveyors.ie

26-27 Upper Mount Street
Dublin Ireland
D02 F890