

Mike Hooper
HCH
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London W1B 3HH



17 SLINGSBY PLACE
LONDON | WC2E 9AB

22 November 2024

Dear Mike

RE: ALEXANDER HOUSE, READING – DAYLIGHT AND SUNLIGHT ADDENDUM

I write further to the correspondence with Nathalie Weekes at Reading BC regarding the planning applications at the above site (ref: PL/24/1285 & PL/24/1284) and the comments received relating to daylight and sunlight.

Our team has reviewed the modelling and confirm that the internal spaces have been modelled to reflect the impact of the internal horizontal obstructions to the sky. As such, the internal daylight results provided can be relied upon. In terms of the sunlight results, sunlight is measured at the surface of the window and so, in any event, any changes internally to the room would result in the same sunlight values being calculated. These results can, therefore, also be relied upon.

I note that a further comment states:

“In addition the daylight and sunlight report provided did not take into account the loss of light that would occur during winter months and the tables provided illustrated that the studio flats would not attain required sunlight.”

This first part of this comment appears to be a misunderstanding of the recommended methodology for the calculation of internal sunlight levels. When calculating the impact of a proposed building on surrounding properties, the BRE Guidelines recommend calculating both the annual and winter probable sunlight hours. However, when calculating sunlight levels within a proposed development, as is the case here, the methodology changes to sunlight exposure. The BRE Guidelines state in paragraph 3.1.10:

For interiors, access to sunlight can be quantified. BS EN 17037] recommends that a space should receive a minimum of 1.5 hours of direct sunlight on a selected date between 1 February and 21 March with cloudless conditions. It is suggested that 21 March (equinox) be used. The medium level of recommendation is three hours and the high level of recommendation four hours. For dwellings, at least one habitable room, preferably a main living room, should meet at least the minimum criterion.

As such, there is no requirement to calculate winter sunlight levels for this proposal.

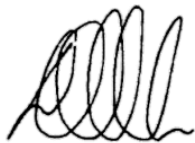
Regarding the sunlight levels received by the studio flats, it is first worth noting that the BRE Guidelines acknowledge that not all units are likely to be able to face within 90° of due south in multi-unit developments in paragraph 3.1.8. Furthermore, Schedule 2, Part 3 of The Town and Country Planning (General Permitted Development) (England) Order 2015 (the “GPDO”) states that, where the application relates to prior approval as to adequate natural light, the local planning authority must refuse prior approval if adequate natural light is not provided in all the habitable rooms of the

dwellinghouses. However, no definition as to what 'adequate natural light' constitutes is provided in the legislation. Given that all rooms meet their daylight target value, in our view each unit is provided with adequate natural light.

Finally, previous planning appeal decisions (see APP/E5900/W/23/3320405; Lemon Tree House, 51-53 Bow Road, London) have allowed schemes where sunlight levels within the proposed development are lower than the target values outlined in the BRE Guidelines. In the above case, the inspector noted "although it would be desirable for rooms and private outdoor spaces to receive sunlight during at least part of the day, in particular main living spaces, I accept that is not achievable within the constraints of the site. The restrictions on sunlight, even where below the recommended target, do not in my view make living conditions unacceptable".

In summary, therefore, I confirm that the modelling of the proposal takes into account the horizontal obstructions to daylight. In addition, the provision of winter sunlight levels is not required in the BRE Guidelines and the methodology used in our report is appropriate. Finally, regarding studios that do not meet their target sunlight value, previous planning appeal decisions have acknowledged the constraints of a particular site can be limiting to sunlighting²⁴ but that this did not result in unacceptable living conditions. Given the Permitted Development legislation refers only the provision of adequate natural light, in our view this has been demonstrated and the scheme is therefore acceptable in daylight and sunlight planning terms.

Yours Sincerely,

A handwritten signature in black ink, appearing to read 'Luke Wilson', with a stylized, cursive script.

Luke Wilson
Associate Director
For and on behalf of Point 2