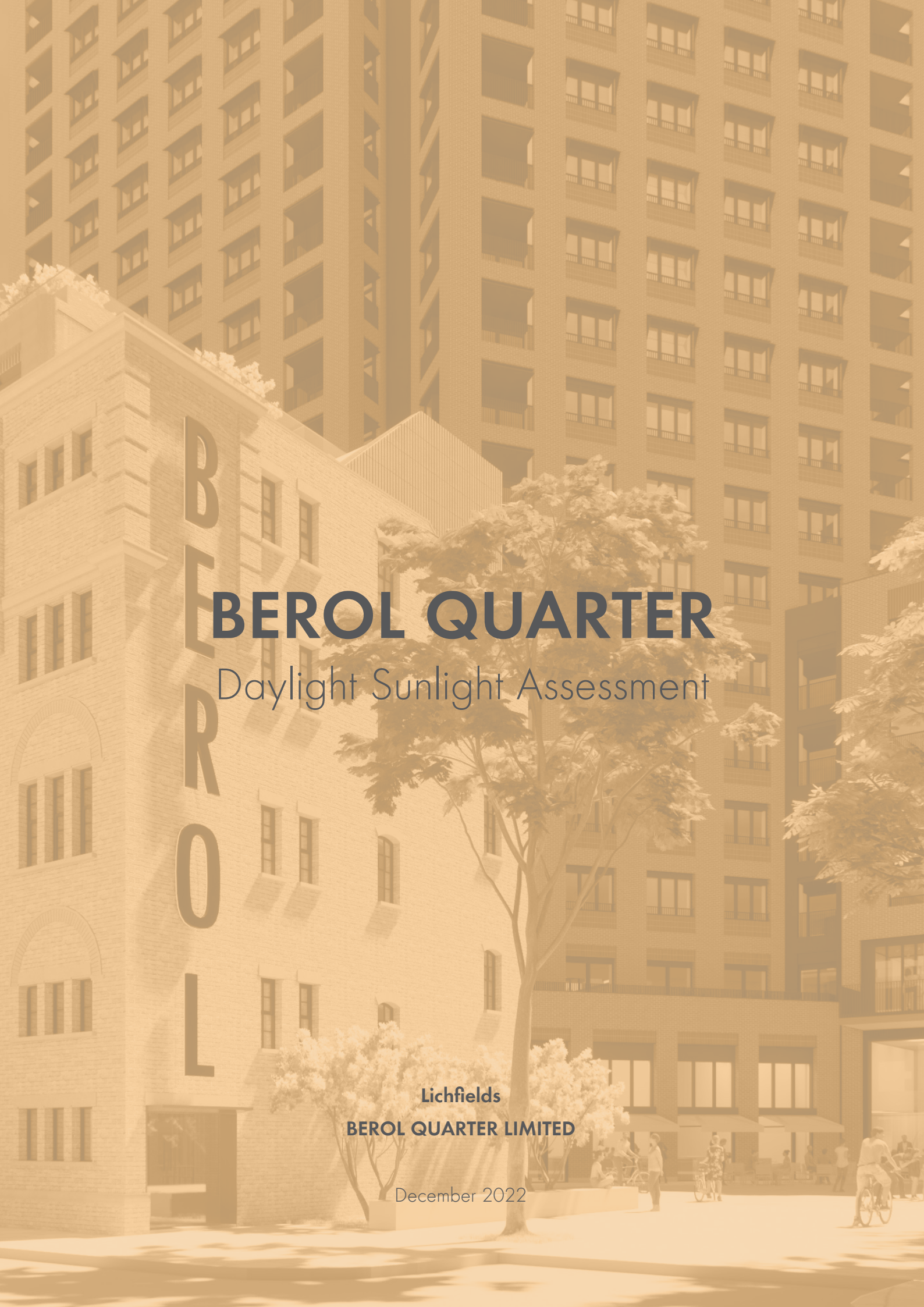


An architectural rendering of the Berol Quarter development, featuring a mix of historic and modern architecture. A large, multi-story brick building with arched windows and the word 'BEROL' written vertically in large letters is on the left. To its right is a taller, modern building with a grid of windows. In the foreground, there are trees, a paved plaza, and people walking and cycling. The entire image has a warm, orange-tinted overlay.

BEROL QUARTER

Daylight Sunlight Assessment

Lichfields
BEROL QUARTER LIMITED

December 2022

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**Berol Quarter, Ashley Road,
Tottenham Hale N17 9LJ
Daylight, Sunlight and
Overshadowing Report**

64605/02/BK/TRL

Berol Quarter Limited

November 2022

LICHFIELDS

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1.0 Introduction

- 1.1 This report considers the effects of the proposed development at Berol Quarter, Ashley Road, Tottenham Hale N17 9LJ (the site), on the levels of daylight and sunlight received by the neighbouring residential accommodation. Additionally, the effect on the sunlight amenity of the proposed amenity spaces has been studied. Daylight and sunlight within the proposed development has also been analysed to determine the natural light amenity for future occupants. The assessment has been prepared on behalf of Berkeley Square Development Ltd (the Applicant).
- 1.2 The proposed development is the refurbishment and extension of Berol House to include Use Class E floorspace and the redevelopment of 2 Berol Yard to provide new residential homes, Use Class E floorspace and associated landscaping, public realm improvements, car and cycle parking and other associated works (proposed development).
- 1.3 The quantitative assessments have been undertaken in accordance with the guidelines set out in the Building Research Establishment (BRE) report “*Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice*” (June 2022). The Guide is intended to be advisory and does not contain mandatory standards. The introduction of the BRE Report states:
- “The guide is intended for building designers and their clients, consultants, and planning officials. The advice given here is not mandatory and the guide should not be seen as an instrument of planning policy; its aim is to help rather than constrain the designer. Although it gives numerical guidelines, these should be interpreted flexibly since natural lighting is only one of many factors in site layout design (see Section 5). In special circumstances the developer or planning authority may wish to use different target values. For example, in a historic city centre, or in an area with modern high-rise buildings, a higher degree of obstruction may be unavoidable if new developments are to match the height and proportions of existing buildings. Alternatively, where natural light is of special importance, less obstruction and hence more sunlight and daylight may be deemed necessary. The calculation methods in Appendices A and B are entirely flexible in this respect. Appendix F gives advice on how to develop a consistent set of target values for skylight under such circumstances.”*
- 1.4 It should be noted that the current BRE Report is a recent revision to the 2011 guidance and contains some differences. These differences are concentrated on the testing of proposed accommodation. The revised BRE Report was issued in June of this year, and we are aware that Local Planning Authorities are still seeking guidance on the changes and how to interpret the new criteria. Whilst this learning process progresses, and for completeness, we have undertaken analysis of the proposed development using both the current and previous testing methodologies to allow for both comparison against earlier analyses and conformity with the new guidance.
- 1.5 This assessment has been carried out using the following information:
- The planning application drawings prepared by Allies and Morrison Architects;
 - Measured Survey information;
 - Ordnance Survey Superplan digital mapping of the area;
 - Site photos; and
 - Aerial photography.
- 1.6 The assessment is supported by a series of reference plans, results tables and diagrams at Appendices 1-7.

2.0 Planning Policy

2.1 The revised **National Planning Policy Framework** (2021) sets out national planning policies and how they should be applied. In relation to daylight, sunlight and overshadowing, the NPPF promotes flexibility:

“local planning authorities should refuse applications which they consider fail to make efficient use of land, taking into account the policies in this Framework. In this context, 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)”.

2.2 Additionally, the National Planning Policy Guidance (NPPG) (Oct 2019) provides that:

“All developments should maintain acceptable living standards. What this means in practice, in relation to assessing appropriate levels of sunlight and daylight, will depend to some extent on the context for the development as well as its detailed design. For example in areas of high-density historic buildings, or city centre locations where tall modern buildings predominate, lower daylight and daylight and sunlight levels at some windows may be unavoidable if new developments are to be in keeping with the general form of their surroundings.

In such situations good design (such as giving careful consideration to a building’s massing and layout of habitable rooms) will be necessary to help make the best use of the site and maintain acceptable living standards.”

2.3 The statutory development plan covering the proposal site is formed by the London Plan (2021) and the London Borough of Haringey Local Plan 2017. The Mayor’s London Housing SPG (March 2016) is also of relevance.

2.4 The London Plan addresses the residential amenity effects of development. Policy D6 states that proposals for buildings should, amongst other things, “... *provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing and maximising the usability of outside amenity space.*”

2.5 The London Plan is a material consideration in planning decisions. The Plan states (“Table 3.2 - Qualitative design aspects to be addressed in housing developments) that “*The site layout, orientation and design of individual dwellings and, where applicable, common spaces should:*

- *provide privacy and adequate daylight for residents*
- *be orientated to optimise opportunities for visual interest through a range of immediate and longer range views, with the views from individual dwellings considered at an early design stage*
- *provide clear and convenient routes with a feeling of safety*
help reduce noise from common areas to individual dwellings
- *help meet the challenges of a changing climate by ensuring homes are suitable for warmer summers and wetter winters”.*

2.6 With regards to public realm, the London Plan states that a development should “*ensure that appropriate shade, shelter, seating and, where possible, areas of direct sunlight are provided,*

with other microclimatic considerations, including temperature and wind, taken into account in order to encourage people to spend time in a place”.

- 2.7 The Mayor’s Housing SPG (March 2016) provides guidance on a range of strategic policies including housing supply, residential density and housing standards. It states that “*an appropriate degree of flexibility needs to be applied when using BRE guidelines to assess the daylight and sunlight impacts of new development on surrounding properties as well as within new developments themselves*”. The document further states that “the degree of harm on adjacent properties and the daylight targets within a proposed scheme should be assessed drawing on broadly comparable residential typologies within the area and of a similar nature across London”.

- 2.8 The SPG additionally states (paragraphs 2.3.45 to 2.3.47);

“...Daylight enhances residents’ enjoyment of an interior and reduces the energy needed to provide light for everyday activities, while controlled sunlight can help to meet part of the winter heating requirement.

Sunlight is particularly desirable in living areas and kitchen dining spaces. The risk of overheating should be taken into account when designing for sunlight alongside the need to ensure appropriate levels of privacy. In addition to the above standards, BRE good practice guidelines and methodology can be used to assess the levels of daylight and sunlight achieved within new developments...”

“...Where direct sunlight cannot be achieved in line with Standard 32, developers should demonstrate how the daylight standards proposed within a scheme and individual units will achieve good amenity for residents. They should also demonstrate how the design has sought to optimise the amount of daylight and amenity available to residents, for example, through the design, colour and landscaping of surrounding buildings and spaces within a development...”

“...BRE guidelines on assessing daylight and sunlight should be applied sensitively to higher density development in London, particularly in central and urban settings, recognising the London Plan’s strategic approach to optimise housing output (Policy 3.4) and the need to accommodate additional housing supply in locations with good accessibility suitable for higher density development (Policy 3.3).

Quantitative standards on daylight and sunlight should not be applied rigidly, without carefully considering the location and context and standards experienced in broadly comparable housing typologies in London”.

- 2.9 When discussing area density, the SPG provides the following guidance:

“Appropriate density ranges are related to setting in terms of location, existing building form and massing, and the index of public transport accessibility (Ptal). The setting can be defined as:

central – *areas with very dense development, a mix of different uses, large building footprints and typically buildings of four to six storeys, located within 800 metres walking distance of an international, Metropolitan or Major town centre.*

urban – areas with predominantly dense development such as, for example, terraced houses, mansion blocks, a mix of different uses, medium building footprints and typically buildings of two to four storeys, located within 800 metres walking distance of a district centre or, along main arterial routes

suburban – areas with predominantly lower density development such as, for example, detached and semi-detached houses, predominantly residential, small building footprints and typically buildings of two to three storeys.”

- 2.10 At the local level, the Strategic Policies state that while “*the Council needs to make the best use of the borough’s limited land and resources*”, it will also seek to “*protect the amenity of occupiers and neighbours*”.
- 2.11 The Development Management DPD goes further and its Policy DM1 (“Delivering High Quality Design”) states that “*development proposals must ensure a high standard of privacy and amenity for the development’s users and neighbours*” and the Council will support proposals that “*provide appropriate sunlight, daylight and open aspects (including private amenity space where required) to all parts of the development and adjacent buildings and land*”. The document refers to the Building Research Establishment (BRE) as providing “guidance on site layout planning to achieve good sun-lighting and day-lighting”.

3.0 Non-Statutory Guidance

British Research Establishment Report 209 Site Planning for Daylight and Sunlight, a guide to good practice (Third Edition 2022) (the ‘BRE Report’)

- 3.1 The introduction of the BRE Report stresses that the purpose of the document is to provide guidance, the numerical guidance contained in the report should not ‘*be seen as an instrument of planning policy*’. The BRE Report also stresses that its guidance should be interpreted flexibly as there are many elements that influence site layout design. The BRE Report uses the example of a historic city centre, or an area with modern high-rise buildings where a higher degree of obstruction may be unavoidable if developments are to match the height and proportions of existing buildings. This flexibility is further prescribed by the following extracts from the introduction:

‘The advice given here is not mandatory and this document should not be seen as an instrument of planning policy; its aim is to help rather than constrain the designer. Although it gives numerical guidelines, these should be interpreted flexibly because natural lighting is only one of many factors in site layout design...’ (page 7, paragraph 1.6)

‘In special circumstances the Developer or Planning Authority may wish to use different target values.’ (page 7, paragraph 1.6)

‘Note that numerical values given here are purely advisory. Different criteria may be used, based upon the requirements for daylighting in an area viewed against other site layout constraints. Another important issue is whether the existing building is itself a good neighbour, standing a reasonable distance from the boundary and taking no more than its fair share of light.’ (page 14 paragraph 2.2.3)

- 3.2 The BRE Report guidance can be applied to any suburban, urban and rural area. Adopting an inflexible approach in suburban and urban areas will prejudice some developments where it can be argued that the expectation of natural light amenity is lessened.
- 3.3 The BRE Report emphasizes the expectations of daylight and sunlight amenity within residential properties and further properties where natural light is considered desirable (i.e., hospitals, hotels and schools).

Daylight to Neighbouring Buildings

- 3.4 As a first measure the BRE Report states that:

“If any part of a new building or extension, measured in a vertical section perpendicular to a main window wall of an existing building from the centre of the lowest window, subtends an angle of more than 25 degrees to the horizontal, then the diffuse daylighting of the existing building may be adversely affected.” (page 18 paragraph 2.2.23)

- 3.5 The BRE Report discusses two tests that should be applied where the 25° line test suggests natural light of neighbouring existing buildings may be affected. The first test applied is the Vertical Sky Component (VSC) method of assessment. VSC calculates the amount of

skylight available on a vertical wall or at the centre of a window. The analysis provides the ratio of the skylight available on a horizontal plane to that available on a vertical plane both planes are placed about the centre of the test point. Neighbouring buildings and other obstructions hinder skylight and comparison between the available daylight before and after a building is created can be calculated. The CIE 'standard overcast sky' is used and the ratio between the two is provided as a percentage. The maximum VSC value is slightly below 40% for an unobstructed vertical test point.

- 3.6 VSC assesses skylight amenity striking the exterior of a property and assumes that good daylight will be achieved given good skylight access, conventional window design and standard room depths. The BRE Report suggests an additional test is applied where the interior layouts of the test property are known. The effect of a development on the distribution of daylight (DD) within a property can be found by plotting the no sky lines in both the current and proposed conditions. The no sky line test measures the distribution of daylight over a working plane (0.85m above floor level) within the test room. The test determines the area of the working plane where there is no direct access to skylight.

- 3.7 Regarding direct daylight within a room, No Sky Line or Daylight Distribution (DD), paragraph 2.2.11 of the BRE Report states:

"If, following construction of a new development, the no sky line moves so that the area of the existing room, which does receive direct skylight, is reduced to less than 0.80 times its former value this will be noticeable to the occupants, and more of the room will appear poorly lit. This is also true if the no sky line encroaches on key areas like kitchen sinks and worktops."

- 3.8 The diffuse daylighting of an existing building may be adversely affected if either:

"the vertical sky component ['VSC'] measured at the centre of an existing main window is less than 27%, and less than 0.8 times its former value; or

the area of the working plane (0.85m above floor level in residential properties) in a room which can receive direct skylight is reduced to less than 0.8 times its former value."

- 3.9 The BRE Report provides guidance in relation to existing windows with balconies or protrusions/overhangs where daylight could be affected:

"Existing windows with balconies above them typically receive less daylight. Because the balcony cuts out light from the top part of the sky, even a modest obstruction may result in a large relative impact on the VSC, and on the area receiving direct skylight. One way to demonstrate this would be to carry out an additional calculation of the VSC and area receiving direct skylight, for both the existing and proposed situations, without the balcony in place. For example, if the proposed VSC with the balcony was under 0.8 times the existing value with the balcony, but the same ratio for the values without the balcony was well over 0.8, this would show that the presence of the balcony, rather than the size of the new obstruction, was the main factor in the relative loss of light." (paragraph 2.2.13)

"A larger relative reduction in VSC may also be unavoidable if the existing window has projecting wings on one or both sides of it, or is recessed into the building so that it is obstructed on both sides as well as above." (paragraph 2.2.14)

- 3.10 Appendix F (paragraph F7) also provides guidance on the types of tests to be applied when testing any reduction of light to an existing building and states:

“In assessing the loss of light to an existing building, the VSC is generally recommended as the appropriate parameter to use. This is because the VSC depends only on obstruction, and is therefore a measure of the daylighted environment as a whole. The average daylight factor (ADF) (Appendix C) also depends on the room and window dimensions, the reflectance of interior surfaces and the type of glass, as well as the obstruction outside. It is an appropriate measure to use in new buildings because most of these factors are within the developer’s control.”

- 3.11 Appendix F of the BRE Report clarifies the situations when meeting a set daylight factor or daylight illuminance target value with a new development in place could be appropriate as a criterion for loss of light. These are:

‘(i) where the existing building is one of a series of new buildings that are being built one after another, and each building has been designed as part of the larger group

(ii) as a special case of (i), where the existing building is proposed but not built. A typical situation might be where the neighbouring building has received planning permission but not yet been constructed

(iii) where the developer of the new building also owns the existing nearby building and proposes to carry out improvements to the existing building (e.g. by increasing window sizes) to compensate for the loss of light. However, where there is a long-term occupier of the existing building it would be appropriate for there to be no reduction in ADF, or at worst only a small reduction. BS 8206-2 states that a reduction in VSC to 0.8 times its former value corresponds to a reduction in the ADF in the rooms served by the window to between 0.85 times and 0.92 times its former value when the original VSC was more than 27% or 5% respectively

(iv) where the developer of the new building also owns the existing nearby buildings and the affected rooms are either unoccupied or would be occupied by different people following construction of the new building” (Paragraph F8)

Sunlight to Neighbouring Properties

- 3.12 Access to sunlight for existing buildings and any non-domestic buildings where there is a particular requirement for sunlight should be protected. The BRE Report discusses sunlight expectations being restricted to windows that face within 90 degrees of due south, windows facing principally north will see sunlight access restricted to the very early morning and late afternoon/evening when the sun is close to the horizon. In summary:

‘If a living room of an existing dwelling has a main window facing within 90 degrees of due south, and any part of a new development subtends an angle of more than 25 degrees to the horizontal measured from the centre of the window in a vertical section perpendicular to the window, then the sunlighting of the existing dwelling may be adversely affected. This will be the case if the centre of the window:

- *receives less than 25% of annual probable sunlight hours and less than 0.80 times its former annual value; or less than 5% of annual probable sunlight hours between 21 September and 21 March and*
- *also has a reduction in sunlight received over the whole year greater than 4% of annual probable sunlight hours.”*

3.13 Additionally, the BRE Report states:

‘...It is suggested that all main living rooms of dwellings, and conservatories, should be checked if they have a window facing within ninety-degrees of due south. Kitchens and bedrooms are less important, although care should be taken not to block too much sun. In non-domestic buildings any spaces which are deemed to have a special requirement for sunlight should be checked; they will normally face within ninety-degrees of due south anyway.’ (Paragraph 3.2.3)

3.14 Balconies and overhangs can affect natural light amenity. The BRE Report provides the following guidance:

‘Balconies and overhangs above an existing window tend to block sunlight, especially in summer. Even a modest obstruction may result in a large relative impact on the sunlight received. One way to demonstrate this would be to carry out an additional calculation of the APSH, for both the existing and proposed situations, without the balcony in place. For example, if the proposed APSH with the balcony was under 0.8 times the existing value with the balcony, but the same ratio for the values without the balcony was well over 0.8, this would show that the presence of the balcony, rather than the size of the new obstruction, was the main factor in the relative loss of sunlight.’ (Paragraph 3.2.11)

Overshadowing (Sun on Ground)

3.15 Section 3.3 of the BRE Report gives the following guidelines for protecting sunlight within open spaces where a requirement has been identified:

- *“gardens, such as the main back garden of a house or communal gardens including courtyards and roof terraces*
- *parks and playing fields*
- *children’s playgrounds*
- *outdoor swimming pools and paddling pools, and other areas of recreational water such as marinas and boating lakes (the daylight and sunlight effects on permanent residential moorings may be assessed using the methods in sections 2.2 and 3.2)*
- *sitting out areas such as those between nondomestic buildings and in public squares nature reserves (which may have special requirements for sunlight if rare plants are growing there).”*

3.16 In summary:

'It is recommended that for it to appear adequately sunlit throughout the year, at least half of a garden or amenity area should receive at least 2 hours of sunlight on 21 March. If as a result of new development an existing garden or amenity area does not meet the above, and the area which can receive 2 hours of sun on 21 March is less than 0.8 times its former value, then the loss of sunlight is likely to be noticeable. If a detailed calculation cannot be carried out, it is recommended that the centre of the area should receive at least 2 hours of sunlight on 21 March.'

3.17 The BRE Report also recommends:

'Where there are existing buildings as well as the proposed one, 'before' and 'after' shadow plots showing the difference that the proposed building makes may be helpful. In interpreting the impact of such differences, it must be borne in mind that nearly all structures will create areas of new shadow, and some degree of transient overshadowing of a space is to be expected.' (Paragraph 3.3.13)

'As an additional option, plots for summertime (e.g., 21 June) may be helpful as they will show the reduced overshadowing then, although it should be borne in mind that 21 June represents the best case of minimum shadow, and that shadows for the rest of the year will be longer. Conversely, if winter shadows (e.g., 21 December) are plotted, even low buildings will cast long shadows. In a built-up area, it is common for large areas of the ground to be in shadow in December.' (Paragraph 3.3.15)

'If a particular space is only used at certain times of day or year (e.g., a café, outdoor performance area or school playground) it is instructive to plot shadows for those specific times.' (Paragraph 3.3.16)

Appendix F

3.18 Appendix F provides guidance on the setting of alternative target values for skylight and sunlight access. The appendix discusses when a number of situations where adherence to the guidance would be inappropriate, one example discussed derives an alternative VSC target based on the proximity of neighbouring properties, i.e., in a historic city mews where VSC values should be determined by the typical obstruction angle from the ground floor windows. Typically leading to a VSC target of 18%. The use of this guidance allows development to match the height and footprint of neighbouring property. Alternatively, daylight and sunlight targets may be generated from values deemed acceptable for a previous planning consent on the proposed site.

3.19 Appendix F discusses the use of a modified version of this approach applicable when a neighbouring property sits close to a site boundary and takes more than its fair share of light from over the development site (also discussed in section 2.3 of the BRE Report). Appendix F states:

"To ensure that new development matches the height and proportions of existing buildings, the VSC and APSH targets for these windows could be set to those for a 'mirror-image' building of the same height and size, an equal distance away on the other side of the boundary."

Proposed Accommodation Daylight and Sunlight Tests (BS EN 17037)

3.20 European Standard BS EN 17.37:2018 – Daylight in buildings has been adopted by the UK (June 2019). The standard discusses the methods to be used to ensure that rooms within proposed development are successfully daylighted. The BRE Report has been revised in line with this guidance.

3.21 BS EN 17037:2018 introduces a number of new tests and definitions for analysis and states that:

“A space is considered to provide adequate daylight if a target illuminance level is achieved across a fraction of the reference plane within a space for at least half of the daylight hours.

In addition, for spaces with vertical or inclined daylight openings, a minimum target illuminance level is also to be achieved across the reference plane.

The reference plane of the space is located 0.85 m above the floor, unless otherwise specified. A small fraction of the reference plane may be disregarded to account for singularities.”

Daylight to Proposed Accommodation

3.22 Daylight testing under the previous BRE Report guidance was undertaken using the ADF and No-Sky Line/Daylight Distribution (DD) methodologies.

3.23 For a proposed Development, daylight amenity is appraised using the Average Daylight Factor (ADF) and DD tests. ADF is given as the:

“Ratio of total daylight flux incident on a reference area to the total area of the reference area, expressed as a percentage of outdoor illuminance on a horizontal plane, due to an unobstructed CIE standard overcast sky.”

3.24 ADF uses the diffuse light transmittance of the glazing serving a room, the net glazed area of the glazing serving the room, the total area of the room surfaces (ceiling, walls, floor and windows), and the angle of visible sky reaching the glazed areas. ADF also applies the reflectance values of the internal surfaces of the room.

3.25 Regarding DD, appendix C of the previous BRE Report states:

“If a significant area of the working plane (normally more than 20%) lies beyond the no sky line (i.e. it receives no direct skylight) then the distribution of daylight in the room will look poor and supplementary electric lighting will be required.”

3.26 The revised BRE Report provides guidance on British Standard BS EN 17037:2018. This standard provides two methods for assessing daylight in interiors. Method 1 uses climatic data and an adequate time step over which target and minimum illuminances are to be met. Method 2 uses daylight factors on the reference plane with National Annex NA providing target illuminances of 100 lx for bedrooms, 150lux for living rooms and 200 lux for kitchens to be achieved by at least 50% of the reference plane for at least half the daylight values.

- 3.27 The daylight illuminance (E_T) tests, method 1, uses climatic data for the location of the site to calculate the illuminance from daylight at each point on the assessment grid over an hourly interval for a typical year.
- 3.28 The target illuminance (E_T) is to be achieved across at least half of the reference plane for at least half of the available daylight hours. Additionally, a supplemental target illuminance (E_{TM}) should be achieved across 95% of the reference plane.
- 3.29 The target illuminances for side lit side lit rooms are given as:

Level of recommendation	Target illuminance E_T (lx) for 50% of assessment grid	Target illuminance E_{TM} (lx) for 95% of assessment grid
Minimum	300	100
Medium	500	300
High	750	500

Target illuminances from daylight over at least half of the daylight hours

- 3.30 The daylight factor test, method 2, assesses daylight factors across a reference plane at 850mm above floor level covering the whole room area. The plane should see the target daylight factor (D_{TM}) achieved across at least 50% of the test plane. For the United Kingdom the target minimum, daylight factor (D) value is 2.1%, the medium value is 3.5% and the high value is 5.3%. For rooms with restricted sky view, i.e., basement rooms or rooms in developments that are in close proximity to other structures, the targets differ:
- In Jersey the minimum for bedrooms is 0.6%, 0.9%, for living rooms and 1.2% for kitchens,
 - In London the minimum for bedrooms is 0.7%, 1.1%, for living rooms and 1.4% for kitchens,
 - In Birmingham the minimum for bedrooms is 0.6%, 0.9%, for living rooms and 1.2% for kitchens,
 - In Aberdeen the minimum for bedrooms is 0.7%, 1.1%, for living rooms and 1.4% for kitchens,

Sunlight Exposure to Proposed Accommodation

- 3.31 Sunlight amenity (Sunlight Exposure (S_E)) is to be tested in spaces which receive sun beams. Testing is to be undertaken for any day between February 1st and March 21st and should determine sunlight exposure at the windows. Three targets are given and relate to minimum (1.5 h), medium (3.0 h) and high (4.0 h).
- 3.32 The BRE Report (paragraphs 3.1.15 and 3.1.16) provides the guidance:
- “In general a dwelling, or non-domestic building that has a particular requirement for sunlight, will appear reasonably sunlit provided:*
- *at least one main window wall faces within 90° of due south and*
 - *a habitable room, preferably a main living room, can receive a total of at least 1.5 hours of sunlight on 21 March. This is assessed at the inside centre of the window(s);*

sunlight received by different windows can be added provided they occur at different times and sunlight hours are not double counted.

Where groups of dwellings are planned, site layout design should aim to maximise the number of dwellings with a main living room that meets the above recommendations.”

GLA representation hearing report D&P/3067/03 – Appendix 1

- 3.33 The GLA hearing report provides commentary on daylight expectations in an inner-city urban location and in the main agrees with the guidance in the BRE Report. However, the report does deviate from the BRE Report and states that VSC values in excess of 20% should be considered as reasonably good and values in the mid-teens should be acceptable. VSC values below 10% are considered to be poor.
- 3.34 In addition, the report discusses the reductions in neighbouring daylight and sunlight that occur when undeveloped land is built on. The report notes that reductions are likely to exceed the BRE Report recommendations and that reductions of 30% up to 40% are to be expected.

4.0 **Assessment**

- 4.1 As part of the iterative design process the proposed development was subjected to interim daylight, sunlight and overshadowing assessments inclusive of the properties neighbouring the proposed development and habitable rooms within the proposed development. The purpose of these studies was to inform the design process and ensure appropriate natural light is achieved for both neighbouring occupiers and future residents.
- 4.2 Desktop research and site observations have highlighted three neighbouring consented developments. Analysis of these properties has been included in our tests and the proposed scheme massing placed within our analysis modelling to account for cumulative impacts. Internal arrangement plans were obtained for all of the studied neighbouring properties.
- 4.3 Analysis has been undertaken using the guidance contained in the BRE Report BR 209 (Third Edition). For the neighbouring buildings this includes daylight testing using the Vertical Sky Component (VSC) and No-Sky Line/Daylight Distribution (DD). Sunlight has been tested for all south facing windows using the Annual Probable Sunlight Hours (APSH) tests.
- 4.4 To allow for continuity with the methodologies discussed in previous site planning applications, testing of natural light for the future residents of the proposed development has been undertaken with reference to the previous BRE Report and the now revised BRE Report. As such, for the proposed development, tests have been undertaken using the ADF, DD and APSH criteria discussed in the previous BRE Report, and the ET and Sunlight Exposure tests discussed in the revised guidance.
- 4.5 The BRE Report discusses and provides guidance on target values for each of the above tests, however, the report does also discuss the difficulty of meeting these targets in urban areas. Whilst the BRE Report discusses the setting of alternative values it does not provide definitive urban targets. The GLA and numerous local authorities discuss these restrictions in their guidance and policy documents. These urban expectations need to be considered in addition to the definitive targets used within the testing undertaken.

Neighbouring Properties

- 4.6 The BRE Report guidance should be used as a basis for establishing significance criteria. For the analysis discussed in this document the significance of the effects on the neighbouring properties is described using the following standardised terminology:
- major adverse/beneficial effect;
 - moderate adverse/beneficial effect;
 - minor adverse/beneficial effect;
 - negligible effect.
- 4.7 The classification of the daylight impacts on the neighbouring buildings is as follows:
- Negligible effect: Neighbouring windows/rooms achieve the BRE Report guide levels (a negligible effect will be noted where calculations meet or exceed the targets for respective room uses or are within 0.8 times their current value);

- Minor adverse: Neighbouring rooms/windows retain daylight and sunlight levels between 0.7 and 0.8 times their former values;
- Moderate adverse: Neighbouring rooms/windows experience greater losses, but the retained levels remain between 0.6 and 0.7 times former value;
- Major adverse: Neighbouring rooms experience greater losses of daylight and the retained levels are less than 0.6 times former values.

- 4.8 In addition to the application of the BRE Report guidance outlined above, minor adverse effects are typically considered to reflect that the site is located within a regeneration area and in a higher density urban environment. In such urban areas, the BRE Report guidance, which is based on a lower density scale of development, is of limited practical relevance and its strict application would unreasonably inhibit otherwise acceptable development. This approach is consistent with the NPPF, the London Plan, and is supported by the findings discussed in the GLA representation hearing report D&P/3067/03 – Appendix 1.
- 4.9 Review of the proposed development area shows it is neighboured by a number of consented buildings and recently constructed buildings. Our assessments have assumed that the consented properties are in place. Overall, the results show the proposed development performs well, with the majority of properties seeing minor or moderate modifications to their current amenity. Where transgressions of the BRE Report guidance are noted, they are highly localised i.e., the Gessner Building and the Tottenham Hale Centre. Our results are summarised in the tables below.
- 4.10 An extant consented development applies to the site. We have studied the findings of the analysis undertaken for the application. Due to changes in the neighbouring context, i.e., buildings now in place (Tottenham Hale Centre) or recently consented (Ashley Park West, Ashley House B1A), that did not form part of the previous analysis, a direct comparative exercise is not practical. We have undertaken an exercise which assesses the impacts the consented scheme would have on the immediate neighbouring properties. This bespoke comparison is discussed below where relevant.
- 4.11 The proposed development is within an urban area and the GLA guidance is of relevance. The GLA guidance accepts that a greater degree of sky dome obstruction will occur in urban areas and that greater percentage changes are likely where existing windows overlook underdeveloped land.
- 4.12 This guidance is a material consideration and the alternative daylight expectations need to be discussed as part of any analysis exercise. As such, we have additionally shown the VSC compliance with a range of 15% or a retention of 0.7 times current values set as appropriate targets.

Address	VSC	VSC GLA Target	DD	APSH (windows)
Gessner Building	300/442	322/442	194/264	103/180
Unite Students - North Lodge	91/91	91/91	87/91	-
De Havilland Court	226/267	226/267	128/128	37/38
Unite Students – Emily Bowes Court	130/130	130/130	130/130	-

Address	VSC	VSC GLA Target	DD	APSH (windows)
Tottenham Hale Centre – Ashley Road East	264/428	365/428	264/270	145/147
Ashley Road West	59/66	59/66	32/32	24/24
Ashley Gardens B1A - Block C1	103/103	103/103	64/71	69/92
Ashley Gardens B1A - Block C2	161/201	196/201	116/130	74/108
Ashley Gardens B1 - Block C4	108/110	110/110	73/73	93/95
Ashley Gardens B1 - Block C3	128/128	128/128	91/93	80/105
Ashley Gardens B1 - Block C1	92/92	92/92	90/90	92/92
Ashley Gardens B1 - Block C2	62/67	67/67	45/45	60/66
Ashley House - Building 3	221/252	240/252	133/148	152/175
Ashley Park	21/42	24/42	18/28	21/21
Ashley House B1A	105/164	127/164	80/115	16/76
TOTALS	2071/2583 (80%)	2170/2583 (84%)	1545/1708 (90%)	966/1219 (79%)

Daylight and sunlight analysis summary table

- 4.13 The overall results show that 2071 (80%) of the 2583 windows tested for VSC will see full compliance with the BRE Report criteria. Consideration of those windows seeing only a minor adverse impact shows that the overall compliance rate will increase to 2214 (86%) of the windows tested.
- 4.14 DD analysis shows 1545 (90%) of the 1708 rooms tested would see full compliance with the BRE Report guidance. The compliance rate would rise to 1584 (93%) when considering minor transgressions also. This level of daylight compliance is in excess of area expectations.
- 4.15 APSH analysis undertaken using the BRE Report guidance shows that 966 (79%) of the 1219 windows tested will see compliance with the guidance. Considering the urban nature of the area this level of sunlight compliance is also in excess of expectations.
- 4.16 The results for each of the tested neighbouring properties are discussed below.

The Gessner Building

- 4.17 The south elevation of this fourteen-storey block would face directly towards the site of the proposed development. The proposed development site is currently undeveloped and as such there is no current obstruction to natural light striking the south elevation of this property. As discussed in the GLA notes on urban expectations when properties currently overlook a clear site, reductions are likely to exceed the BRE Report recommendations and reductions of 30% up to 40% are to be expected.
- 4.18 Review of the VSC assessments shows that 300 of the 442 windows tested will see full compliance with the BRE Report, 8 will see a minor transgression, 10 will see reductions between 30% and 40% and 124 will see a major adverse reduction. The VSC assessments show that 322 of the windows will retain in excess of 15% VSC or 0.7 times their former value. Where transgressions of the BRE Report guidance and the urban range do occur they

tend to be those windows where the balconies serving the spaces above limit the current VSC. In these instances, even very modest (i.e., 5% absolute VSC) reductions in the VSC manifest as significant percentage changes. Overall, the impacts of the proposed development on the VSC to this building are considered to be moderate adverse. This significance takes the self-limiting effects of the balconies into consideration.

- 4.19 Comparison with the extant scheme in place shows that 367 of the tested windows would see BRE Report compliance. Where transgressions are noted the results show that 24 windows would see minor transgressions, 19 would see moderate transgressions and 32 would see major transgressions.
- 4.20 DD assessments show that 264 of the 270 rooms tested will retain full BRE Report compliance with 4 rooms seeing a minor adverse impact and 2 seeing a moderate adverse impact. The overall impact is considered to be negligible.
- 4.21 Again, a comparison exercise was undertaken with the extant scheme in place. This exercise shows that 212 rooms would comply with the DD guidance, 5 would see minor transgressions, 14 would see moderate transgressions and 33 would see major transgressions.
- 4.22 Sunlight analysis undertaken using the APSH tests show that 103 of the 180 south facing windows will retain full compliance with the BRE Report. Review of the retained sunlight values shows that the majority of windows will retain APSH values consistent with urban expectations. The impacts on sunlight are considered to be minor adverse.

Unite Students Buildings (North Lodge and Emily Bowes Court) and De Havilland Court

- 4.23 These purpose-built student accommodation blocks and residential building are to the east of the proposed development and are separated from the site by Watermead Road and the Tottenham Hale rail tracks.
- 4.24 VSC analysis shows all windows within both student accommodation buildings will comply fully with the BRE Report guidance. Some transgressions within De Havilland Court are noted but review of the analysis results shows that these are limited to secondary windows where the main windows serving the rooms retain compliance. The impact of the proposed development on the VSC of these buildings is negligible.
- 4.25 DD assessments again show that all buildings will see full compliance. Overall, the impacts are negligible.
- 4.26 The number of windows requiring testing for sunlight amenity is limited to 38 windows serving De Havilland Court. The analysis shows all but one window will see full compliance. The overall impacts are negligible.

Tottenham Hale Centre – Ashley Road East

- 4.27 This predominantly residential building is to the immediate south of the site. The building sees its two main elements in close proximity to each other and provides private amenity space through the use of projecting balconies. Both of these elements lead to VSC values below the BRE Report guidance with the site in its currently undeveloped state. As such,

some rooms are susceptible to change with even small changes in the absolute VSC values leading to notable percentage deviations.

- 4.28 VSC analysis shows that 264 of the 428 windows assessed will maintain full BRE Report compliance. Looking at the range of transgressions the analysis shows that 83 windows will see a minor transgression, 45 will see a moderate transgression and 36 will see a major transgression. 365 windows will maintain VSC values of 15% or above or retain 0.7 times their current values. Impacts are minor to moderate adverse.
- 4.29 DD analysis shows that the vast majority of rooms will maintain full BRE Report compliance for daylight penetration 264 of the 270 rooms assessed will retain full BRE Report compliance. Where transgressions are noted, they predominantly occur to bedrooms. Two living spaces will see minor transgressions, with each retaining 0.79 times their formed values, negligibly below the 0.8 times BRE Report guidance. Impacts are negligible to minor adverse.
- 4.30 This building was not studied as part of the extant scheme analysis, but we have undertaken an exercise to show the daylight with the extant scheme in place. This exercise shows that:
- VSC: 367 windows would see BRE Report compliance, 24 would see minor transgressions, 19 would see moderate transgressions and 32 would see major transgressions.
 - DD: all rooms would see BRE Report compliance.
- 4.31 APSH analysis shows that all but two of the windows requiring analysis will see full compliance with the BRE Report guidance. The two noted transgressions occur to bedrooms which are considered to have a lesser significance in sunlight terms by the BRE Report. The impacts of the proposed development on the sunlight to this property are negligible.

Ashley Road West and Ashley Gardens (blocks B1A (C1 and C2) and B1 (C4, C3, C1 and C2))

- 4.32 These residential properties are to the west of the proposed development. The majority of the buildings form part of the Ashley Gardens masterplan with only Ashley Road West being a supplemental development.
- 4.33 Analysis has been undertaken for each and the summary extracted from the table above and shown below.

Address	VSC	VSC GLA Target	DD	APSH (windows)
Ashley Road West	59/66	59/66	32/32	24/24
Ashley Gardens B1A - Block C1	103/103	103/103	64/71	69/92
Ashley Gardens B1A - Block C2	161/201	196/201	116/130	74/108
Ashley Gardens B1 - Block C4	108/110	110/110	73/73	93/95
Ashley Gardens B1 - Block C3	128/128	128/128	91/93	80/105
Ashley Gardens B1 - Block C1	92/92	92/92	90/90	92/92
Ashley Gardens B1 - Block C2	62/67	67/67	45/45	60/66

- 4.34 VSC analysis shows that the majority of windows will maintain full BRE Report compliance. The assessments show that only windows within Ashley Road West, Ashley Gardens B1A-C1 and C2 and B1 C2 will see transgressions. In total the analysis shows that there would be 22 minor transgressions, 21 moderate transgressions and 11 major transgressions. Overall, 93% (713) of the tested windows would see full compliance. Taking the minor transgressions into consideration the compliance rate would increase with 96% of the windows seeing full compliance or only a minor deviation. Looking at the urban compliance rate 98% of the windows would meet the urban range of 15% VSC or retention of at least 0.7 times their former values. Impacts are negligible to minor adverse.
- 4.35 DD analysis again shows a high level of compliance with 96% of the rooms seeing full compliance with the BRE Report guidance. Transgressions are limited to 14 minor, 4 moderate and 5 major transgressions. Review of the daylight penetration analysis shows that the rooms would maintain good levels of direct daylight access, particularly given the urban nature of the area. As such the impacts are negligible to minor adverse.
- 4.36 We have undertaken an exercise to show the daylight with the extant scheme in place. This exercise shows that:
- VSC: all windows would see BRE Report compliance.
 - DD: 526 (99%) of the rooms would see BRE Report compliance. 2 rooms would see minor transgressions, 3 moderate transgressions and 3 would see major transgressions.
- 4.37 APSH assessment shows that 85% of the windows would maintain full BRE Report compliance. Given the urban nature of the area and the proximity of these building to each other this level of compliance is above expectations. The analysis shows that where impacts are noted they tend to be minor to moderate adverse but there are a limited number of major adverse impacts noted, despite these the impacts are considered, overall, to be negligible to moderate adverse.

Consented developments Ashley House (building 3), Ashley Park and Ashley House (B1A)

- 4.38 These consented residential buildings are to the west and the north of the proposed development. In line with the BRE Report guidance we have supplemented our analysis with Spatial Daylight Autonomy (Et) and Sunlight Exposure (SE) tests.

Address	VSC	VSC GLA Target	DD	APSH (windows)
Ashley House - Building 3	221/252	240/252	133/148	152/175
Ashley Park	21/42	24/42	18/28	21/21
Ashley House B1A	105/164	127/164	80/115	16/76

- 4.39 VSC analysis shows that 347 (76%) of the 458 windows tested will see full compliance with the BRE Report. 30 windows will see a minor transgression, 22 a moderate transgression and 59 a major transgression of the guidance. Review of the building designs shows that a significant number of windows will see limited direct daylight access due to the use of recessed balconies and their proximity to the Ashley Gardens buildings. This is highlighted by the Et analysis which shows a low level of compliance. Given the urban nature of the site

and the limited current daylight access of some of the windows the impacts on VSC are minor to moderate adverse.

- 4.40 DD analysis shows that 231 (79%) of the rooms will maintain BRE Report compliance. 13 rooms will see minor transgressions, 13 moderate transgressions and 34 will see major transgressions. Again, the impacts are considered to be minor to moderate overall given the urban nature and the limiting effects of recessed balconies.
- 4.41 E_T analysis highlights the limiting effects of the balconies. The tests for Spatial Daylight Autonomy are an absolute test of what will be present with the proposed development in place and no comparison with the current values is undertaken. The buildings are in an urban area and as such use of the UK Annex is supported. The analysis shows that 114 of the 291 rooms assessed will comply with the targets for their room types.
- 4.42 APSH analysis shows 189 (69%) of the 272 south facing rooms will see full BRE Report compliance. SE analysis of all rooms regardless of orientation shows 147 (51%) of the 291 rooms will see compliance with the guidance. As with the daylight analysis the sunlight assessments show the urban nature of the site and the limitations due to the building typographies. Overall, the impacts are moderate adverse.

Overshadowing

- 4.43 Analysis of four neighbouring amenity spaces has been undertaken. The assessments were undertaken for both March 21st and June 21st and show the areas within the spaces that will see 2 hours of more direct sunlight access on those dates.
- 4.44 The assessments of the areas to the west (Ashley Link, Notting Hill Site and Berol Link) show that the spaces would maintain full BRE Report compliance, i.e., negligible impact. Assessment of the open space to the north shows that major impacts are noted in March but negligible impacts in June.

Proposed Development

- 4.45 The proposed development includes residential accommodation from first floor upwards. We have analysed all windows and rooms identified as serving/being habitable rooms.
- 4.46 As discussed in the current BRE Report, daylight analysis has also been undertaken using the Spatial Daylight Autonomy (E_T) test. Sunlight amenity has been tested using the Sunlight Exposure test.
- 4.47 It should be noted that following discussions with the design team the following parameters have been used in our daylight analysis where applicable:
- Glazing Transmittance of 0.68
 - Frame Correction Factor of 0.8
 - Below working plane factor of 0.4 (equal to floor reflectance)
 - Floor reflectance value of 0.4 (equivalent to light coloured laminate or carpet)
 - Wall Reflectance of 0.7 (equivalent of light-coloured paint with a medium level of obstruction)

- Ceiling reflectance of 0.81 (equivalent of white paint)
- Ground plane reflectance of 0.2
- External structures reflectance of 0.3 (equivalent to red brick)

4.48 As discussed above, we have additionally undertaken analysis using the previous BRE Report (Second Edition) guidance using the Average Daylight Factor (ADF) and Daylight Distribution (DD) tests.

4.49 Our detailed daylight analysis results are appended to this report and summarised below.

ADF	ADF (Liv at 1.5%)	DD	Et UK Annex	Et Min	Et Med	Et High
485/570 (85%)	533/570 (94%)	496/ 570 (90%)	468/ 570 (82%)	221	67	0

Daylight analysis summary table

4.50 The **ADF** analysis shows a high level of compliance with 85% of the rooms complying with the previous BRE Report Guidance. Review of the proposed development floorplans shows that the living spaces are often in combined use with the dining space and/or the kitchens. The BRE Report discusses rooms in mixed use and provides the guidance that rooms in mixed use should apply the highest daylight target applicable. However, both the BRE and local planning authorities have accepted that for rooms inclusive of living space, kitchens and diners (LKDs, LKs and LDs), particularly in urban areas, an ADF target of 1.5% (target for a living space) is more relevant. Applying this revised guidance our analysis shows that the compliance rate would be increased to 94%.

4.51 **DD** analysis shows that 90% of the rooms tested will see compliance with the BRE Report. This overall compliance rate is in excess of urban expectations and expectations in developments of this type, particularly where private balconied amenity space is provided.

4.52 Using the guidance in the revised BRE Report, we have analysed the daylight amenity using the **E_T** tests. A review of the proposed development shows that rooms within this urban development have the potential to see significant obstruction at the lower levels due to the placement of the neighbouring proposed blocks. The BRE Report discusses the use of the UK Annex to BS EN 17037 and provides an alternative UK specific minimum to be applied in hard to light dwellings, i.e., in basements or where significant external obstructions occur. As discussed in the BRE Report, the UK Annex provides minimum standards for all UK dwellings.

4.53 The **E_T** analysis shows that 82% of the 570 rooms across the whole proposed development will meet the UK annex minimum target. Overall, 67 will meet the medium scale and 221 will meet the minimum scale. Use of the UK Annex is suitable where it is clear that neighbouring properties would lead to significant obstructions to daylight access. Clearly with a taller building its use throughout the development is less relevant at the upper levels of the building. Looking at the accommodation from the eleventh floor upwards (318 rooms) the **E_T** tests show that 162 rooms would meet the minimum guidance values and 55 would meet the medium guidance. Where rooms do transgress the guidance, the analysis using the UK Annex targets shows that 304 of the 318 rooms would see compliance. As

such, whilst there are some transgressions of the baseline targets at the upper levels the UK Annex analysis show these rooms would see appropriate levels of daylight.

Number of Rooms Tested	Rating				No. of Rooms Satisfying Criteria
	High	Medium	Minimum	Below	
570	155	32	122	261	309 (54%)

Sunlight analysis summary table

4.54 As guided by the revised BRE Report we have undertaken sunlight analysis of all rooms regardless of their orientation. The BRE Report notes at paragraph 3.1.6 that:

“A south-facing window will, in general, receive most sunlight, while a north-facing one will only receive it on a handful of occasions (early morning and late evening in summer).”

4.55 Sunlight Exposure analysis shows that 155 rooms will meet the high scale targets, 32 will meet the medium scale targets and 122 will meet the minimum standard target. Overall, 309 (54%) meet the targets in the sunlight BRE Report. Where transgressions are noted, they primarily occur to rooms with a northerly aspect.

Overshadowing

4.56 Overshadowing assessments of the proposed open space to the base of the building and the proposed amenity space have been undertaken. The results show that the will see limitations for the March test but see good sunlight for the June test.

4.57 Assessment of the open space to the base of the scheme shows there would be some limitations in direct sunlight access for the March 21 test date but that the space would see compliance when tested on the 21 June. The assessments show the typical limitations that occur in urban sites during the winter months, but that sunlight access will increase through the summer months.

5.0 Conclusion

Neighbouring properties

- 5.1 The quantitative assessments have been undertaken in accordance with the guidelines set out in the BRE Report. The BRE Report is based on a restricted height model of development and must be treated with flexibility within regeneration areas. The BRE Report is intended to be an advisory document and does not contain mandatory standards. Its strict application is inherently limited in urban locations where expectations of levels of daylight and sunlight are logically very different.
- 5.2 A flexible application of the BRE guidance must reflect the site's context. Its introduction states:
- “The guide is intended for building designers and their clients, consultants and planning officials. The advice given here is not an instrument of planning policy; its aim is to help rather than constrain the designer. Although it gives numerical guidelines, these should be interpreted flexibly since natural lighting is only one of many factors in site layout design. In special circumstances the developer or planning authority may wish to use different target values. For example, in a historic city centre, or in an area with modern high rise buildings, a higher degree of obstruction may be unavoidable if new developments are to match the height and proportions of existing buildings.”*
- 5.3 The need for a flexible approach to the BRE Report guidance has been recognised in the revised National Planning Policy Framework (2021). The London Housing SPG contains similar guidance by stating that *“an appropriate degree of flexibility needs to be applied when using BRE guidelines to assess the daylight and sunlight impacts of new development on surrounding properties as well as within new developments themselves”*. The document further advises that *“the degree of harm on adjacent properties and the daylight targets within a proposed scheme should be assessed drawing on broadly comparable residential typologies within the area and of a similar nature across London”*.
- 5.4 Overall, the effects of the proposed development on the neighbouring properties are in line with area expectations. Whilst some localised transgressions do occur it can be seen that they are predominantly driven by the limitations placed by the use of projecting and recessed balconies on the tested neighbouring buildings and by the comparison with the values achieved with the site undeveloped.
- 5.5 Review of the assessments undertaken with the extant scheme in place shows that the proposed development would have a limited additional impact but that the properties would maintain appropriate daylight.

Proposed Development

- 5.6 Analysis of the proposed residential accommodation shows that daylight and sunlight amenity is appropriate for this type of development with the majority of rooms seeing full compliance with the BRE Report daylight guidance. Sunlight amenity testing highlights the urban nature of the site and the area intentions. As with most urban sites of this nature direct sunlight amenity within some rooms will be limited.

- 5.7 Given the character and form of the property and its urban location the daylight and sunlight amenity of the proposed development is considered to be acceptable. The assessment demonstrates that the development is appropriate in the context of the BRE guide and relevant policy, particularly having regard to the flexibility inherent to the BRE guide and its suburban basis, the urban character of the site and its surroundings and the character of the proposed development.

Overall Conclusions

- 5.8 Assessment shows that the proposed development will result in some deviation from the daylight and sunlight guidelines in relation to neighbouring properties and the proposed habitable accommodation within the scheme. However, this is typical of most large urban development projects in London, particularly in regeneration areas. It should be noted that:
- 1 The effects of the development on neighbouring properties are highly localised and are exacerbated by the neighbouring buildings' proximity to the development site and their use of limiting façade treatments.
 - 2 Good levels of natural light are retained by the vast majority of neighbouring properties, above expectations for a higher density urban environment.
 - 3 Within the proposed development itself, the majority of the proposed units will experience high levels of interior daylight. Where breaches of the guidance occur within the scheme, they primarily relate to windows set directly beneath balconies. In these cases, the amenity benefits associated with the development's balconies offsets any associated reduction in natural light.
 - 4 The BRE guide indicates that, in interpreting the results of an assessment, an appropriate degree of flexibility is required. Such flexibility has been applied in relation to other applications in Haringey.
 - 5 The BRE guidance is underpinned by a typical (two storey) suburban model of development. Its strict application is inherently limited in urban locations where expectations of levels of daylight and sunlight are logically very different. The flexible application of the BRE guidance must reflect the site's context and the benchmarks set by other nearby schemes.
 - 6 The NPPF and both strategic and local planning policy of relevance to the site's redevelopment encourages the development of higher density developments and schemes which make efficient use of such accessible and prominent urban sites. The weight that is attached to the BRE guidelines needs to reflect the wider policy framework.
- 5.9 Taking account of all of these factors, it is concluded that the effects of the development on the neighbouring properties and the levels of natural light within the proposed units are acceptable in the context of the NPPF, planning policy and BRE Report guidance.

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