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Eunice Huang  
Planning, Regeneration & Economy  
Haringey Council  
Level 6  
River Park House  
Wood Green  
N22 8HQ

20 May 2025

Dear Ms Huang

Re: Daylight and Sunlight – HGY/2024/0921: Erection of one additional storey at roof level to existing building to provide two self contained apartments, plant and associated works, Harcourt House, 16-17 Haringey Park, Hornsey, London, N8 9JB

### **Introduction**

I am instructed by the leaseholders of Harcourt House to provide professional assessment and opinion on matters of daylight and sunlight in respect of their strong objections to the above application.

The proposals (lodged in April 2024) are for an upward extension of a single storey, pitched roof element, above the existing four storey property at Harcourt House to provide two additional residential dwellings.

In particular I have been asked to review the various reports and statements relating to the daylight, sunlight and shading effects of the scheme proposals and provide commentary as to the accuracy and adequacy of this information.

### **Policy Background**

Both local and national planning policy advises that new development will only be permitted where it is shown not to cause unacceptable loss of daylight, sunlight amenity or overshadowing to neighbouring properties. In respect of the current application the following policies are considered to be relevant and were highlighted to the applicant as part of the pre-application feedback issued to them by Haringey on 14<sup>th</sup> September 2023:

The London Plan – The Mayor of London (March 2021)

*Policy D6 Housing quality and standards*

*“D. The design of development should 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.”*



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Haringey Development Management DPD (July 2017)

*Policy DM1 Delivering High Quality Design*

*Privacy and amenity*

*"D Development proposals must ensure a high standard of privacy and amenity for the development's users and neighbours. The Council will support proposals that:*

*a Provide appropriate sunlight, daylight and open aspects (including private amenity space where required) to all parts of the development and adjacent buildings and land;."*

**Housing Design Standards LPG – The Mayor of London (June 2023)**

***Policy D6 Housing quality and standards***

*"Maximise the quality and availability of daylight and sunlight in communal outside spaces, particularly in winter. It is particularly important that spaces designed for frequent use (including sitting and play spaces) receive direct sunlight through the day, particularly at times they are most likely to be used."*

In respect of the Harcourt House proposals it is relevant that policy DM1 requires that appropriate sunlight is retained to **private amenity spaces** as well as to adjacent buildings.

**Method of Assessment**

Daylight and sunlight effects are assessed against the nationally applied Building Research Establishment (BRE) Report 209, 'Site layout planning for daylight and sunlight: A guide to good practice' (2022).

Commonly referred to as 'the BRE guidelines', it provides various testing methodologies to calculate the potential light levels received by neighbours of a development site and provided within a proposed new development.

The applicant is understood to have submitted the following documents, prepared by CHP surveyors, relating to the daylight /sunlight effects of the proposal:

- Opinion note dated 26<sup>th</sup> March 2024 – A summary note claiming sufficient daylight would be maintained without including any technical assessment details or analysis
- Technical report dated 17<sup>th</sup> September 2024 – lacking assessment of impact on Pinehurst Mews and other surrounding properties.
- Addendum technical note dated 16<sup>th</sup> April 2025 – presenting the previously omitted assessment to Pinehurst Mews and confirming non-compliance against the BRE standard shading guidelines.

**Adequacy of Daylight / Sunlight Assessments**

I have reviewed the documents above and note that they consider:

- The potential adequacy of amenity levels within the proposed new units.
- Daylight and sunlight effects to windows of neighbouring properties at Primezone Mews, Sandringham Gardens and Pinehurst Mews.
- Shading / sun on ground effects to gardens at Primezone Mews and Pinehurst Mews.

Within the daylight / sunlight studies I see no consideration of the shading /sun on ground effects of the proposal upon the two communal private gardens of Harcourt House. These spaces are situated to the north of the existing property and provide the only outdoor private amenity for the majority of the existing residents within Harcourt House. All flats in Harcourt House are family sized units (2-3 beds) making outdoor space access with good sunlight particularly important as noted in the relevant policies listed above. The location of these spaces is indicated in the aerial image and photographs below:



*Image 1: Approximate extent of Harcourt House Gardens*



*Image 2/3: Private Gardens of Harcourt House (May 2025)*

Section 3.3 of the BRE guidelines requires the testing of sunlight availability and shading to the existing gardens and this is also a requirement of policy DM1 of the Haringey DPD. In addition, concerns have been raised regarding the proposal potentially shading this private amenity space in a number of the objection letters raised by Harcourt House residents.

The gardens of Harcourt House are situated to the north of the existing building and therefore will already be somewhat shaded. Notwithstanding this the images above illustrate times of good sunlight availability to the spaces providing particularly valuable private amenity for the residents. Development of an additional storey immediately to the south will inevitably increase shading and have an adverse effect on the amenity of these outside spaces as the proposal effectively increases the roofline by c.3m.

In line with section 3.3 of the BRE guidance further analysis is required to assess the effects of the scheme both against the 2+hour sun on ground test (which the applicant's advisor has already undertaken for a number of more distant properties and one found to fall short of BRE standards) and a 'transient' shading test to quantify the change in shading caused by the proposals throughout the year and at different times of the day. In the absence of such studies the currently submitted documents relating to daylight / sunlight are not considered to be comprehensive or meet the requirements of the BRE document or policy DM1.

We would therefore conclude that the LPA cannot appropriately determine the relevant effects of the proposal, or validate the applicant's claim in their Design and Access Statement's conclusions that the proposal "represents no detrimental impact on neighbouring amenity" until the applicant has provided this information and it has been consulted upon.

### **Assessment of Adjacent Properties and Private Amenities**

In addition to the omission of the assessment of the communal gardens the extent / scope of the daylight and sunlight assessments may be inadequate as they lack assessments for several properties and gardens that are in closer proximity to the proposals than the Pinehurst Mews gardens identified as impacted beyond the BRE targets. A number of objections and remarks have been raised to the council from the residents of those properties. These include:

- Private outdoor space for 7 Harcourt House
- Private garden for 18 Haringey Park
- Private garden and the property of 21 Haringey Park

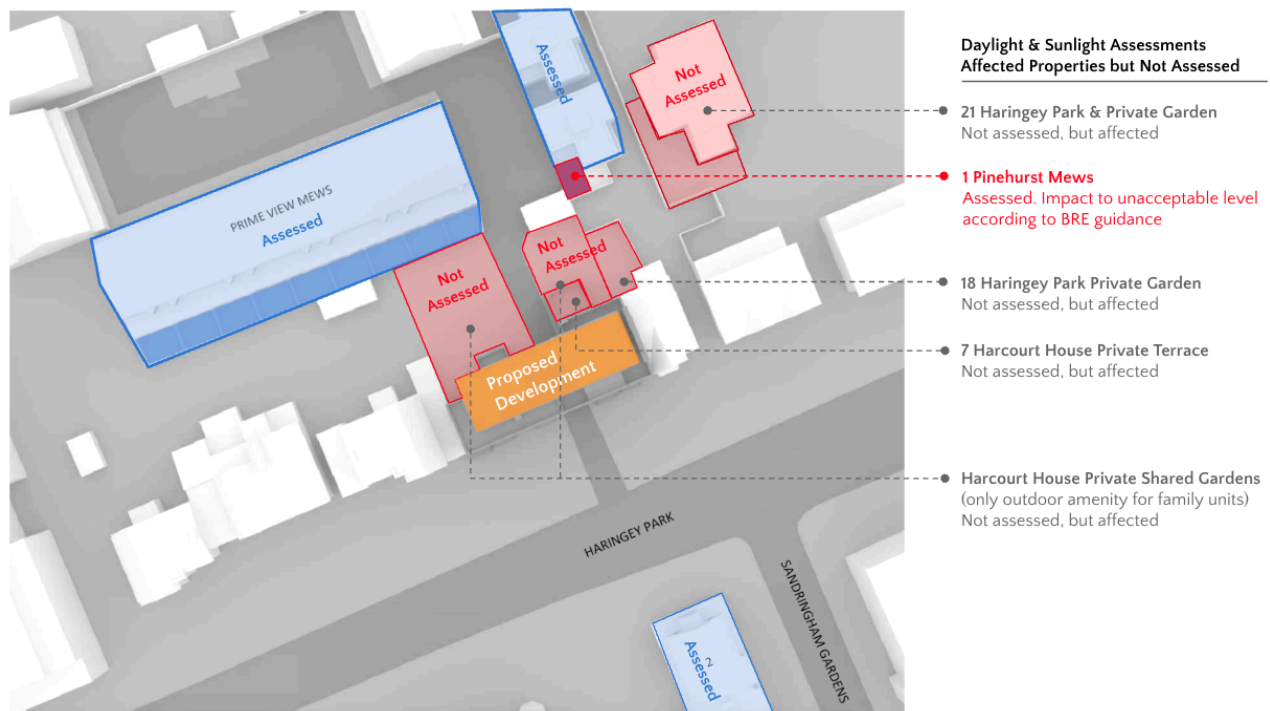


***Image 4: Plan showing additional properties potentially relevant for consideration***



*Image 5/6: Private Terrace of 7 Harcourt House and 21 Haringey Park*

The applicant's assessments of 16<sup>th</sup> April have identified a level of sunlight loss beyond the BRE targets to the private garden of 1 Pinehurst Mews. As such the applicant should extend their assessment to cover the properties identified above given their closer proximity to the development.

An extended and more detailed assessment of these effects is required to provide appropriate information on which to determine the application and confirm whether the proposed development impact is within acceptable standards outlined in the BRE guidance and policies above.

#### **Accuracy of Daylight / Sunlight Assessment**

In addition to reviewing the extent of the submitted daylight /sunlight results I have also considered the accuracy of the testing submitted by the applicant. Whilst limited to a desktop review this has highlighted potential issues which must be addressed prior to the determination of the application.

Of particular relevance are the images of the assessment model contained within the appendices to the detailed technical report of 17<sup>th</sup> September 2024. The 'proposed' modelling of the Harcourt House scheme is illustrated below:

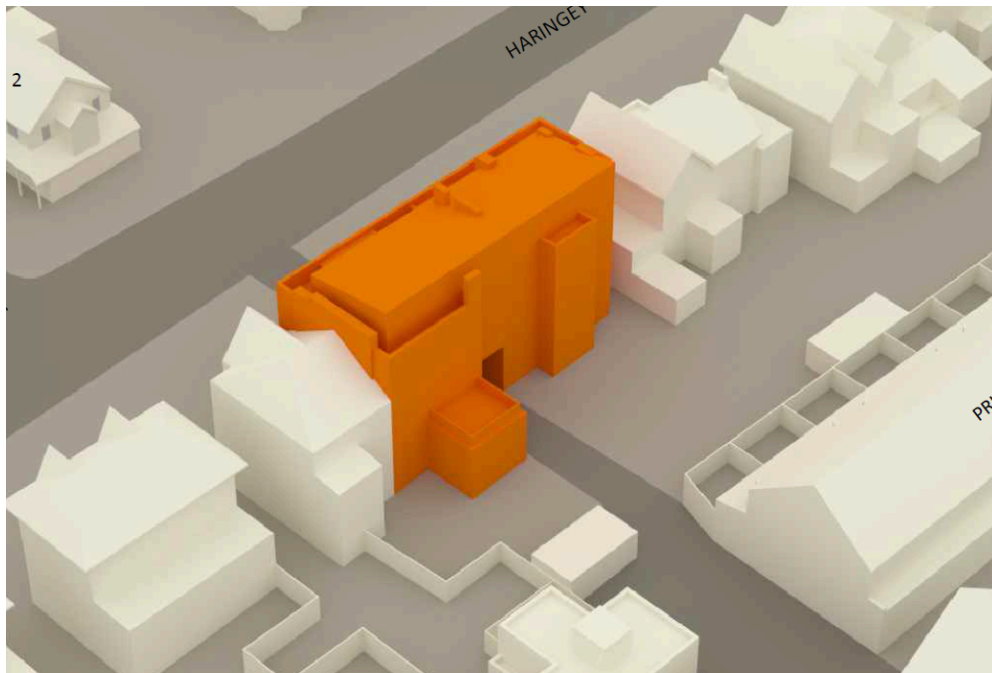


***Image 7 : Proposed modelling extracted from CHP report 17<sup>th</sup> September 2024 (p27)***

The above extract shows the proposal as a flat-roof extension to the existing Harcourt House building. This does not however reflect the proposed planning drawings which indicate a complex pitched roof extension with multiple ridges as per the section and 3D model below:

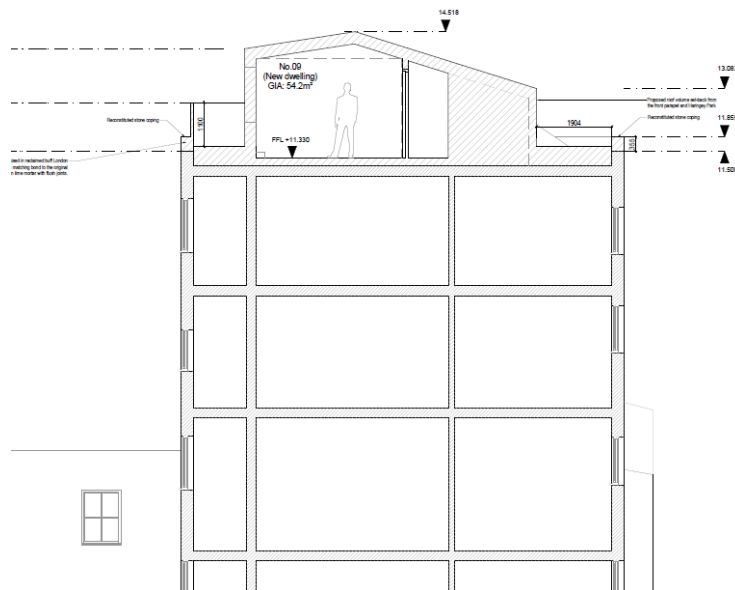


***Image 8 : Proposed section extracted from Cooke Fawcett drawings.***



*Image 9 : Proposed 3d extracted from Cooke Fawcett's Design & Access Statement.*

Whilst it is not clear whether the pitched roof proposal would lead to a greater impact when compared to the analysis presented in the daylight / sunlight report it is clear that the submitted technical work appears to be based on an incorrect interpretation of the extension proposals. The daylight and sunlight assessments therefore appear to be unreliable and this should be addressed prior to any decision in respect of the proposals.

### **Conclusions**

This practice has undertaken a review of the daylight, sunlight and shading assessments submitted by the applicant in support of the extension proposals at Harcourt House. The submitted documents indicate some compliance with the BRE targets but identify shading issues to Pinehurst Mews. A number of potentially relevant considerations are not addressed in the reports presented and I consider them to be deficient in key areas.

Of particular relevance is the lack of any consideration of the shading effects to the pre-existing residents' garden spaces at Harcourt House. This provides valuable private amenity spaces for families that may clearly be affected by the proposals. The studies presented consider the effects to more distant gardens but it is clear that the space serving Harcourt House should be assessed as the most proximate and potentially most sensitive receptor in this regard.

The applicant has provided an assessment of shading effects on Pinehurst Mews which already shows a deviation from the BRE targets in respect of shading to private amenity space.

Having identified this harm the studies then neglect to evaluate the potential impacts on several adjacent properties and their private amenity spaces – specifically the private terrace for 7 Harcourt House, and the private gardens of 18 and 21 Haringey Park – all of which are closer than the properties at Pinehurst Mews that are identified as affected.

In addition to the lack of shading studies a review of the drawings submitted with the application suggest that the roof profile of the scheme may not have been accurately modelled within the daylight / sunlight studies. It is therefore essential that the applicant is asked to address these issues and provide accurate and comprehensive analysis of the proposals. Until this is provided and the information consulted upon I do not consider there to be sufficient information allowing an appraisal of the effects of the scheme as required by the relevant BRE guidance and DPD policy DM1.

I trust the above is clear but please do not hesitate to contact me should you need anything further in this regard.

Yours Sincerely

A handwritten signature in black ink, appearing to read 'J.A. Lonergan', with a stylized flourish extending from the end.

**Jonathan Lonergan MRICS**

**Director**

**For and on behalf of eb7 Limited**