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Dear Laura

Parma House, Clarendon Road, London, N22 6UL: Desk-Top Daylight and Sunlight Report – Application 5

Further to our recent correspondence, we have now completed our desk-top daylight and sunlight review of the proposed scheme at Parma House, London. The proposed scheme will consist of the construction of one additional storey containing 8 residential dwellings.

The site is located in the London Borough of Haringey planning jurisdiction. The Site is shown in red in the aerial photograph in Figure 1 below.



Figure 1: Aerial photo of the Site and neighbouring buildings (© Google)

Our daylight and sunlight study has been carried out using the assessment methodology recommended in the Building Research Establishment (BRE) Report 209, 'Site Layout Planning for Daylight and Sunlight: A guide to good practice' (third edition, 2022) ("the BRE guide") and the Professional Guidance Note, 'Daylighting and sunlighting' (1st edition, 2012), published by the Royal Institution of Chartered Surveyors.

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Planning Policy and guidance

The National Planning Policy Framework (NPPF) sets out the Government’s planning policies and how these should be applied. It provides a framework within which locally prepared plans for housing and other development can be produced. It places an emphasis on sustainable development and delivery of housing.

Chapter 11 of the NPPF, entitled “Making effective use of land”, promotes the effective use of land in meeting the need for homes and other uses. It gives examples such as developing under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively, and upward extensions to create new homes, where they would be consistent with the prevailing height and form of neighbouring properties and the overall street scene. In particular, paragraph 129 states:

Area-based character assessments, design guides and codes and masterplans can be used to help ensure that land is used efficiently while also creating beautiful and sustainable places. Where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site. In these circumstances:

c) 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).

BRE Report 209, ‘Site Layout for Daylight and Sunlight: A guide to good practice’ (2022)

The leading publication providing national guidance on the provision of daylight and sunlight to new development, is ‘Site Layout Planning for Daylight and Sunlight: A guide to good practice’ (BR209, third edition, 2022) published by the Building Research Establishment (hereafter referred to as “the BRE guide”). It is referred to in development plan documents or supplementary planning documents of most planning authorities. It is intended to be used in conjunction with the interior daylighting recommendations in BS EN17037:2018 ‘Daylight in buildings’ and in CIBSE’s lighting guide, LG 10 ‘Daylighting - a guide to designer’.

The BRE guide states:

Summary

This guide gives advice on site layout planning to achieve good sunlighting and daylighting, both within buildings and in the open spaces between them. It is intended to be used in conjunction with the interior daylight recommendations for new buildings in the British Standard, ‘Daylight in buildings’, BS EN 17037. It contains guidance on site layout to provide good natural lighting within a new development; safeguarding of daylight and sunlight within existing buildings nearby; and the protection of daylighting of adjoining land for future development. ... It is purely advisory and the numerical target values within it may be varied to meet the needs of the development and its location...

Introduction

(Its) main aim is ... to help to ensure good conditions in the local environment considered broadly, with enough sunlight and daylight on or between the buildings for good interior and exterior conditions.

This guide is intended for building designers and their clients, consultants and planning officials. The advice given 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 the 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... The calculation methods ... are entirely flexible in this respect...

British Standard, BS EN 17037:2018, 'Daylight in buildings' (May 2019)

British Standard, BS EN 17037:2018, 'Daylight in buildings' provides a standard and methodology by which to assess daylight and sunlight provision in new buildings. Its general recommendations for daylight provision in a space may not be achievable for some buildings in the UK, particularly dwellings; for example, those with basement rooms or significant external obstructions, such as those in dense urban areas or in existing buildings being refurbished or converted into dwellings. The standard's National Annex therefore provides guidance on minimum daylight provision in UK dwellings.

London planning policy

London Borough of Haringey: Development Management DPD: Adopted July 2017

The Council's development plan contains the following policies that are relevant to the effects of development on daylight and sunlight:

Policy DM1: Delivering High Quality Design states:

(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;

The supporting text states, at paragraph 2.10:

The design and layout of buildings must enable sunlight and daylight to penetrate into and between buildings, and ensure that adjoining land or properties are protected from unacceptable overshadowing. The Building Research Establishment (BRE) provides guidance on site layout planning to achieve good sun-lighting and day-lighting (BRE Site Layout Planning for Daylight and Sunlight: a guide to good practice).

Assessment methodology and numerical guidelines

Daylight to neighbouring buildings

The BRE guidelines are intended for use for rooms in adjoining dwellings where daylight is required. Living rooms, dining rooms and kitchens have a greater requirement for daylight. Bedrooms should also be analysed but are less important. Bathrooms, stairwells and other areas without a requirement for daylight need not be assessed. (See BRE paragraphs 2.2.2 and 2.2.10).

Sunlight to neighbouring buildings

In designing new development, care should be taken to safeguard the access to sunlight for existing dwellings and any nearby non-domestic buildings where there is a particular requirement for sunlight.

In housing, the main requirement for sunlight is in living rooms and it is also required in conservatories, but it is viewed as less important in bedrooms and in kitchens. All main living rooms of dwellings, and conservatories, should be checked if they have a window facing within 90° of due south. Normally loss of sunlight need not be analysed to kitchens and bedrooms, except those that also comprise a living space. (See BRE paragraphs 3.1.2 and 3.2.3). Our assessment has therefore assessed the loss of sunlight to living rooms, conservatories and winter gardens.

Internal daylight and sunlight

Detailed recommendations for daylight in new buildings are given in BS EN 17037, 'Daylight in Buildings' ('the British Standard') and repeated in the BRE guide. Appendix C of the BRE guide gives guidance on how to calculate the amount of daylight inside a room.

Daylight provision in new rooms may be checked using either of the methods described in the BRE guide: either direct prediction of daylight illuminance levels using hourly climate data, or the use of the daylight factor, which is a ratio of unobstructed external illuminance under overcast sky conditions. Both are measures of the overall amount of daylight in a space. At this stage, we have undertaken a desk-top review based on the scheme information provided and have not taken a full technical assessment.

Turning to sunlight, in housing, the main requirement for sunlight is in living rooms, where it is valued at any time of day but especially in the afternoon. Sunlight is also required in conservatories. It is viewed as less important in bedrooms and in kitchens.

Information used in our technical study

The desk-top review has been based on the scheme information has been based on the scheme information by Boehm-Lynas Architects provided to us on 13 August 2024. Site layout is the most important factor affecting the duration of sunlight in buildings. It can be divided into two main issues, orientation and overshadowing.

A south-facing window will, in general, receive most sunlight, while east- and west-facing windows will receive sunlight only at certain times of the day, and a north-facing elevation will only receive it on a handful of occasions (early morning and late evening in summer).

Results of the daylight and sunlight review

Daylight and sunlight to neighbouring properties

The proposed scheme is surrounded by commercial buildings and none of the neighbouring properties are located close enough to the development site to experience an alteration in daylight and sunlight levels as a result of the additional massing. The nearest residential buildings are located over 50m to the north of the site and therefore the scheme will fully comply with the BRE guidelines in daylight and sunlight terms and will comfortably sit within the 25-degree angle.

Daylight and sunlight to proposed dwellings

The daylight and sunlight to the proposed dwellings on the lower floors have been tested as part of the other PD applications which have recently been submitted. The results of these assessments indicated that all proposed units on the lower floors satisfied the BRE guidelines. From reviewing the proposed fourth floor layouts, size of the structural opening and limited neighbouring obstructions, we are of the opinion that the proposed dwellings will benefit from good levels of daylight and sunlight and are expected to satisfy the BRE guidelines.

Summary and conclusions

We have undertaken a desk-top review of the proposed scheme considering the potential effects the additional storey could have on neighbouring residential properties and the daylight and sunlight provision to the proposed dwellings.

The proposed scheme comprises of the construction one additional storey creating 8 residential dwellings.

When considering the potential implications to neighbouring residential properties, the proposed scheme is expected to fully comply with the BRE guidelines. This is because the proposed additional massing is modest and there are not any neighbouring residential properties situated close to the site.

Turning to the internal daylight and sunlight provision to the proposed dwellings. All proposed dwellings are expected to satisfy the BRE guidelines. This is due to the site being surrounded by low-level commercial buildings and therefore

the dwellings will all have an unhindered ability to receive natural light. It should also be noted that previous testing has shown that the lower floors satisfy the BRE guidelines.

It is submitted that the layout of the proposed development is consistent with the Council's local planning policy on daylight and sunlight, particularly having regard to paragraph 129 of the National Planning Policy Framework and paragraphs 1.3.45 and 1.3.46 of the Mayor of London's Housing SPG.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Chris Harris', with a stylized flourish at the end.

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