

APPENDIX C – Daylight & Sunlight

Phil Goffin
Fairview
Via Email

Dear Phil,

Re: Reponse to the comments from the SNB group on the design appraisal of the Victoria Quarter development - Daylight and Sunlight performance of the Proposed Development.

Daylight

SNB Cooments:

7.5 - Daylight standards in flats which are below minimum BRE guidelines have been accepted on the false premise that the constraints of an urban built environment make this inevitable.

GIA's reponse

The site is located within the London Borough of New Barnet, to the north of New Barnet Station, to the west of Victoria Recreation Ground and to the south of the Industrial Gas works site. This is considered a strategic location, benefitting from the proximity to the main high street, significant views out to Victoria Recreation Ground and very good transport connectivity, making it a key location for re-development.

In a context like this, the National Planning Policy Framework (NPPF) calls for making the best possible use of land with the aim of delivering much needed residential accommodation.

The proposed massing and orientation of the buildings have been extensively tested to allow optimum levels of daylight and sunlight within the masterplan. Overall, as demonstrated in the internal daylight and sunlight report, the performance of the proposed development is considered very good.

In any new development, and even in existing buildings, lower levels of daylight and sunlight are observed in some habitable rooms, as it is often impossible to achieve full compliance with the BRE guidance while offering private amenity in the form of balconies. The BRE Guidelines and the Housing SPG recognise these challenges and call for contextually appropriate daylight and sunlight targets, as opposed to measuring a development's performance based on nationally applicable numerical targets which are typically achieved in terrace houses no more than three stories in height and without balconies.

BRE Guidelines states in section 1.6 of its handbook:

"The advice given here is not mandatory and the guide should not be seen as an instrument of planning policy. ... 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."

The NPPF also states the following (p37 para 123):

"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."

The Housing SPG also agrees to the flexible and contextual approach regarding the guidance (CD-B12):

"An appropriate degree of flexibility needs to be applied when using BRE Guidelines"

The results presented in the internal daylight and sunlight report are therefore not meant to be interpreted as a strict pass/fail test based on a nation-wide applicable target, they should instead be appreciated considering the Site's aspirations and wider benefits of the scheme.

In relation to the methodology, the internal daylight and sunlight assessments have not included some of the kitchen areas. The assessment provided is generally supported by local authorities and are applicable where the open plan living space has the kitchen designed to be at the back of the room. This is aimed at prioritising good daylight in the main living and dining area, where it is generally more appreciated.

The reason for this is that the guidance of 2% ADF for kitchens is of most relevance for houses which have separate kitchens and dual aspects, however, in modern flats - where occupants enjoy open plan living - achieving the kitchen target is rarely possible in any urban environment as light would not travel all the way back to the kitchen. It is therefore a common industry practice to focus the assessments on the area where there is greater expectation for daylight.

It is also worth noting that most of the comments in the SNB design appraisal, in relation to the daylight and overshadowing, refer to the BRE guidance section within the internal daylight and sunlight report rather than the conclusions section. Their comments were, therefore completely taken out of context, as GIA's conclusions are based on the data of the technical assessment, which demonstrates the good daylight and sunlight performance of the scheme.

Overshadowing

SNB Comments:

7.5 - Taller buildings cast longer shadows. Half of the communal gardens are sunny for a maximum of only three hours /day in the middle of summer.

GIA's response

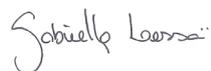
The overshadowing assessments follow the BRE guidance which recommends that for an open amenity space to be considered well sunlit throughout the year, at least 50% of its area should see two or more hours of sunlight on the equinox.

The results of the technical assessments prove that all the proposed open areas of amenity far exceed the minimum guidance. In addition, all areas will receive even greater levels of sunlight during the summer months and some shaded spaces would actually be considered welcome in the summer period.

I hope the above clarifies our position.

Yours sincerely

For and on behalf of GIA



Senior Consultant

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Philip Goffin
Fairview
Via Email

Dear Philip,

Re: Victoria Quarter Development - Daylight and Sunlight.

GIA has been requested to provide a Statement of Conformity in regard to the Daylight and Sunlight assessments previously undertaken as part of the 2020 planning application. The reports submitted for planning covered both the impacts upon neighbouring properties matters and the proposed scheme daylight, sunlight and overshadowing performance.

Following the recent discussions with the Local Authority, GIA has been asked to comment on the latest design changes and the effects upon the neighbouring properties and daylight and sunlight performance of the proposed scheme.

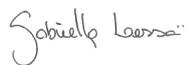
The proposed changes consist of minor alterations on the parapets of some Blocks. In Block A, one storey has also been removed.

Overall, we conclude that the proposed massing alterations are very minor and unlikely to materially alter the daylight, sunlight and overshadowing assessments and conclusions previously reported.

I trust this clarifies GIA's position.

Yours sincerely,

For and on behalf of GIA,



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