

## APPLICATION REF 2016/4619/P

### 8764 – QUEENS CRESCENT

17/11/2016 by KM, reviewed by SP

## RESPONSE TO DAYLIGHT COMMENTS

This document is prepared to provide a response to the comments provided by the borough of Camden with regards to application 2016/4619/P. The key considerations that need to be taken into account when evaluating potential daylight impacts are summarised in the following:

- The numerical criteria of the BRE guidance
- VSC and NSL criteria
- The main aim of the BRE guidance

### ***THE NUMERICAL CRITERIA OF THE BRE GUIDANCE***

Initially, it should be noted that the numerical guidelines given in the guide are purely advisory. Although the numerical values stated by the BRE provide useful guidance to designers, consultants and planning officials, these are purely advisory and may vary depending on context. Dense urban areas, for example, may often experience greater site constraints when compared to low-rise suburban areas, and thus a high degree of obstruction is often unavoidable. As you will see from the introduction section of the document, par. 1.6, page 1:

*“The guide is intended for building designers and their clients, consultants and planning officials. 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 (see Section 5). In special circumstances the developer or Planning Authority may wish to use different target values. For example, in an historic city centre a higher degree of obstruction may be unavoidable if new developments are to match the height and proportions of existing buildings”.*

For example, appendix F of the BRE document is dedicated to the use of alternative values and it also demonstrates the manner in which the criteria for skylight was determined for the summary given above, i.e. the need for 27% vertical sky component for adequate daylighting.

This figure of 27% was achieved using the following methodology: a theoretical road was created with two storey terraced houses upon either side, approximately twelve metres apart. The houses have windows at ground and first floor level, and a pitched roof with a central ridge. Thereafter, a reference point was taken at the centre of a ground floor window of one of the properties and a line was drawn from this point to the central ridge of the property on the other side of the road.

The angle of this line equated to 25 degrees (the 25 degrees referred to in the summaries given with reference to the criteria for skylight). This 25-degree line obstructs 13% of the totally unobstructed sky available, leaving a resultant figure of 27% which is deemed to give adequate daylighting. This figure of 27% is the recommended criteria referred to in our report in the planning officer's comments. It will be readily appreciated that in an urban area, this kind of urban form and setting is unlikely and impractical.

Furthermore, the BRE guide states: *“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 their fair share of light”.* Windows W1 and

W2 are uncharacteristically close to the site boundary and this poses additional constraints in fully conforming to the numerical values of the BRE guidelines.

Therefore, given the location of the proposed development with the height of the immediate neighbouring buildings being more than two storeys in height, it is important to take into account that, although the 27% VSC target is the standard criterion available, it is not fully applicable to the development and that a lower VSC target is acceptable.

### ***VSC AND NSL CRITERIA***

It would be worth noting that the VSC criteria could be used as the main metric to evaluate impacts when neighbouring layouts are completely unknown. This is because the VSC only represents the level of daylight illumination on the external surface of the window and is not a metric to evaluate the amount of daylight entering a room. For this project, the layouts behind windows B1 and B2 are based on the property's drawings and the NSL test represents a more accurate indication of the daylight received by the rooms located behind those windows. Therefore, it would be expected that the NSL test is given more consideration for this application.

### ***THE MAIN AIM OF THE BRE GUIDANCE***

Overall, the main aim of the BRE guide is *“to ensure that new development matches the height and proportion of existing buildings”*. The proposed Queens Crescent development clearly satisfies the overarching aim of the BRE guide and the vast majority of neighbouring windows are compliant with the BRE guidelines.