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27th February 2018

Mr R Tulloch
Senior Planning Officer
London Borough of Camden, Regeneration and Planning
Town Hall
Judd Street
London WC1H 9JE

By email only: Rob.Tulloch@camden.gov.uk

Dear Mr Tulloch,

Re: 2016/2457/P – 1-3 and 4-8 Ferdinand Place, London NW1
Independent review of internal daylight and sunlight assessment

Further to my letter dated 7th February 2018, I have now reviewed the Applicant's consultant's results drawings and data for their assessment of daylight and sunlight levels within a sample selection of living spaces within the proposed development. The information includes the attached results drawing numbers BRE/54 and BRE/55 as well as a table of results and a detailed spreadsheet.

I explained the assessment methodology and BRE numerical guidelines in my previous letter, so I will not repeat them here. I have checked and am satisfied with the parameters used in the ADF calculation, including diffuse light transmittance of the glazing, frame correction factor and internal surface finishes. (The consultant has assumed fairly light coloured finishes which are reasonable, but present pretty much a best case).

The BRE assessment methodology advises that areas of glazing below the level of the working plane (0.85m in housing) should have a factor applied to them to take account of their reduced effectiveness at lighting the room. This factor should be the same as the floor reflectance, which the consultant has taken as 0.4, but the consultant's calculation has not factored that in. Also, it has treated a number of windows as full height (2.4m), whereas the floor plans show kitchen units inside a number of the windows such that the windows cannot be full height. As a consequence of these two anomalies in the study, the actual ADF values will be lower than have been reported. I have informed the consultant, GVA.

In site B, GVA have assessed the two living/kitchen/dining rooms (LKDs) per floor at the rear of the building, facing the rear of 12 Ferdinand Street. GVA have not assessed the LKDs in the units overlooking the street or any of the LKDs on the third floor level, as these will receive adequate daylight and sunlight levels. My comments on the rooms that have been assessed are as follows:

- Flat B2, LKD R1/500 – GVA report a 1.70% ADF and 50% daylit area on the working plane, plus very little sunlight to the windows (7% APSH annually, 0% in winter). Once the ADF results are adjusted to account for the anomalies referred to above, I suspect the actual ADF will be closer 1%, which is fairly low for a living space.

- Flat B2, LKD R2/500 – GVA reports 0.67% ADF and 42% daylit area with good sunlight from the south-facing window. I suspect the actual ADF will be lower at around 0.5%, which is very low for a living space.

- Flat B3, LKD R2/501 – GVA report a 0.86% ADF and 44% daylit area with reasonable sunlight for an urban area (14% APSH annually, 0% in winter). I suspect the actual ADF will probably be closer to 0.7%, which is very low for a living space and good for an urban area.

- Flat B5, LKD R1/501 – GVA reports 2.11% ADF and 84% daylit area with very good sunlight levels. I suspect the actual ADF will be closer to 1.6% ADF, but nonetheless above the minimum level recommended for living space.

- Flat B6, LKD R1/502 – GVA report a 1.60% ADF and 81% daylit area with reasonable sunlight for an urban area (23% APSH annually and 1% in winter). I suspect the actual ADF will be lower, probably around 1.4%, but reasonable for an urban area.

- Flat B8, LKD R2/502 – Very good daylight and sunlight.

As you can see, with the design placing two LKDs per floor at the rear (west) of the block on the site B with projecting balconies above the windows to provide private amenity space for the flats above, this necessarily compromises the available daylight and sunlight to these rooms. The bedroom accommodation in these flats, which faces onto Ferdinand Place, will be much better daylit and sunlit.

Turning to site A, GVA have not assessed any of the proposed dwellings on the basis that they will be better lit as they have a more open aspect on all sides. The proposed building on site A will provide eight flats (of which one is a duplex, Flat A5), arranged at first, second and third floor levels.

I believe the flats in building A will benefit from good or reasonably good daylight on the whole. The LKD in Flat A2 will have a circular rooflight which will make up for the rather constrained daylight that will reach its main window. The only flat whose daylight will therefore be compromised, in my view, will be Flat A4. This has a wide window in the living/dining area, which is blinkered on both sides by projecting wings of the building and faces the 4-storey building at 1 and 2 Ferdinand Place. The first floor plan appears to indicate a circular rooflight in the ceiling, but this is not shown on the second floor plan and would clash with the terrace for Flat A5. Also, the kitchen area extends deep into the building away from the vertical window. Overall, I believe this LKD will be poorly lit but it is the only such instance in this building and therefore probably acceptable, in the round. If necessary, the developer could fit a rectangular rooflight in the green roof above the living area just beyond the line of the balcony/terrace to Flat A5, which would improve the daylight in the living area at least.

As site A is on a north-south axis and as there are privacy issues which have been overcome with a saw tooth pattern with northeast-facing windows along the east boundary, sunlight levels will inevitably be below the BRE guidelines. However, that is as much if not more a factor of the orientation and constraints of the site and is not unusual for an urban area.

Summary

I believe the daylight and sunlight levels to the proposed building on site A will be acceptable. Daylight to the large LKD in Flat A4 could be improved with the introduction of a rectangular rooflight if considered necessary.

In site B, the daylight levels will be quite poor in the rear-facing LKDs, which is a factor partly of the arrangement of the building around a central amenity space mirroring what has been built at 12 Ferdinand Place and partly the provision of balconies to provide private amenity space for the flats. However, it is not unusual in a situation such as this for recommended guideline levels not to be met. If it is considered a problem, it would be possible to improve daylight by configuring the layouts of some of the units so that the living spaces face onto Ferdinand Place rather than the rear courtyard, albeit the balconies will then serve bedrooms rather than the living space, which is not ideal.

I trust this provides you with what you need. I will report the results of the sunlight to the neighbouring back gardens once I receive the results.

Yours sincerely

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Encs. Drawings BRE/54 and BRE/55