.

AVISON YOUNG

DETAILED DAYLIGHT & SUNLIGHT REPORT

20 Hanway Street, London W1

Hanway Developments Limited

July 2020

Contents

Appendices

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For and on behalf of Avison Young (UK) Limited

1. Introduction and Scope of Report

1.1 Avison Young are instructed by Hanway Developments Ltd to consider daylight and sunlight matters associated with their proposed development at 20 Hanway Street, London W1.

1.2 This report will address both provision of natural skylight for future occupants of the proposed dwelling and the impact to existing daylight and sunlight amenity of neighbouring dwellings.

1.3 The site is shown on the aerial image below outlined in red © Google. As can be seen, the site is located in a dense urban setting, with numerous existing neighbouring properties in very close proximity.

1.4 The baseline scenario is therefore considered to be one in which it would be generally more challenging to meet the default recommendations as set out within the BRE guidance, given the proximity of windows serving dwellings directly on several site boundaries.

Figure 1: existing aerial site image

2. Executive Summary

2.1 The proposed development is considered to comply with national and local planning policy and guidance and therefore acceptable on Daylight and Sunlight grounds.

3. Planning Policy

National Planning Policy

NPPF (2019)

3.1 Section 11 "Making effective use of land" Para 123 states:

> *"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)."*

3.2 Section 12 "Achieving well-designed places" Para 127 states:

> *"Planning policies and decisions should ensure that developments:*
>
> *f) Create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience."*

National Planning Practice Guidance "Design" (13 September 2018 Update)

3.3 Paragraph 021 "A well designed space is attractive":

> *"The way a place looks, sounds, feels, and even smells, affects its attractiveness and long-term success. Streetscapes, landscapes, buildings and elements within them all have an influence.*
>
> *So too can more transient elements – such as the way sunshine and shadows move across an area or the way it is maintained and cleaned."*

3.4 Paragraph 26 "Consider scale" states:

> *"This relates both to the overall size and mass of individual buildings and spaces in relation to their surroundings, and to the scale of their parts.*
>
> *Decisions on building size and mass, and the scale of open spaces around and between them, will influence the character, functioning and efficiency of an area.*
>
> *In general terms too much building mass compared with open space may feel overly cramped and oppressive, with access and amenity spaces being asked to do more than they feasibly can. Too little and neither land as a resource or monetary investment will be put to best use.*
>
> *The size of individual buildings and their elements should be carefully considered, as their design will affect the: overshadowing and overlooking of others; local character; skylines; and vistas and*

views. The scale of building elements should be both attractive and functional when viewed and used from neighbouring streets, gardens and parks.

The massing of development should contribute to creating distinctive skylines in cities, towns and villages, or to respecting existing skylines. Consideration needs to be given to roof space design within the wider context, with any adverse visual impact of rooftop servicing minimised.

Account should be taken of local climatic conditions, including daylight and sunlight, wind, temperature and frost pockets."

Ministry of Housing, Communities & Local Government Guidance "Effective use of land" (22 July 2019)

"All developments should maintain acceptable living standards.

What this means in practice, in relation to assessing appropriate levels of sunlight and daylight, will depend to some extent on the context for the development as well as its detailed design.

For example, in areas of high-density historic buildings, or city centre locations where tall modern buildings predominate, lower daylight and daylight and sunlight levels at some windows may be unavoidable if new developments are to be in keeping with the general form of their surroundings."

Regional Planning Policy

GLA "The London Plan" March 2016

3.5 Policy D4 "Housing quality and standards" states:

"E Residential development should maximise the provision of dual aspect dwellings and normally avoid the provision of single aspect dwellings.

A single aspect dwelling should only be provided where it is considered a more appropriate design solution to meet the requirements of Policy D1 London's form and characteristics than a dual aspect dwelling and it can be demonstrated that it will have adequate passive ventilation, daylight and privacy, and avoid overheating.

F The design of development should provide sufficient daylight and sunlight to new housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing and maximising the usability of outside amenity space."

3.6 Policy 7.6 "Architecture" states:

"Building and structures should: … d) not cause unacceptable harm to the amenity of surrounding land and buildings, in relation to privacy, overshadowing, wind and microclimate. This is particularly important for tall buildings."

GLA "Intend to Publish London Plan" December 2019

3.7 The Mayor has issued to the Secretary of State his intention to publish the draft London Plan. This is the Spatial Development Strategy for Greater London.

3.8 Whilst not yet adopted, policies relevant to this assessment include:

3.9 Policy D6 (Housing Quality and Standards) mirrors that of Policy D4 in the 2016 London Plan, as discussed above.

3.10 Table 4.1 sets out 10-year targets for net housing completion for 2019/20-2028-29. For the London Borough of Camden, the 10-year housing target is 10,380.

3.11 Policy H1 Increasing Housing Supply sets outs methods boroughs should use to achieve the targets such as mixed-use redevelopment and intensification.

Mayor of London "Housing Supplementary Planning Guidance" (SPG) March 2016

3.12 Para 1.3.45 "Standards for privacy, daylight and sunlight" states:

> *"Policy 7.6Bd requires new development to avoid causing 'unacceptable harm' to the amenity of surrounding land and buildings, particularly in relation to privacy and overshadowing and where tall buildings are proposed.*
>
> *An appropriate degree of flexibility needs to be applied when using BRE guidelines to assess the daylight and sunlight impacts of new development on surrounding properties, as well as within new developments themselves.*
>
> *Guidelines should be applied sensitively to higher density development, especially in opportunity areas, town centres, large sites and accessible locations, where BRE advice suggests considering the use of alternative targets.*
>
> *This should take into account local circumstances; the need to optimise housing capacity; and scope for the character and form of an area to change over time."*

3.13 Para 1.3.46 "Standards for privacy, daylight and sunlight" states:

> *"The degree of harm on adjacent properties and the daylight targets within a proposed scheme should be assessed drawing on broadly comparable residential typologies within the area and of a similar nature across London.*
>
> *Decision makers should recognise that fully optimising housing potential on large sites may necessitate standards which depart from those presently experienced, but which still achieve satisfactory levels of residential amenity and avoid unacceptable*

Local Planning Policy

Camden Local Plan 2017 (LB Camden)

> ***Policy A1 Managing the impact of development***
>
> *The Council will seek to protect the quality of life of occupiers and neighbours. We will grant permission for development unless this causes unacceptable harm to amenity.*
>
> *We will:*
>
> *a. seek to ensure that the amenity of communities, occupiers and neighbours is protected;*
>
> *b. seek to ensure development contributes towards strong and successful communities by balancing the needs of development with the needs and characteristics of local areas and communities;*

c. resist development that fails to adequately assess and address transport impacts affecting communities, occupiers, neighbours and the existing transport network; and

d. require mitigation measures where necessary.

The factors we will consider include:

e. visual privacy, outlook;

f. sunlight, daylight and overshadowing;

g. artificial lighting levels;

h. transport impacts, including the use of Transport Assessments, Travel Plans and Delivery and Servicing Management Plans;

i. impacts of the construction phase, including the use of Construction Management Plans;

j. noise and vibration levels;

k. odour, fumes and dust;

l. microclimate;

m. contaminated land; and

n. impact upon water and wastewater infrastructure.

Camden Planning Guidance, Amenity March 2018 (LB Camden)

Assessing daylight and sunlight levels

…

3.5 In order to demonstrate that adequate levels of daylight and sunlight are being provided in accordance with Policy A1, the Council will expect applicants to submit daylight and sunlight reports informed by BRE's Site layout planning for daylight and sunlight: A guide to good practice (the 'BRE guidance')

Flexible consideration of daylight and sunlight

3.22 The Council notes the intentions of the BRE document is to provide advice to developers and decision makers and therefore it should be regarded as a guide rather than policy.

3.23 While we strongly support the aims of the BRE methodology for assessing sunlight and daylight we will consider the outcomes of the assessments flexibility where appropriate, taking into account site specific circumstances and context.

For example, to enable new development to respect the existing layout and form in some historic areas, it may be necessary to consider exceptions to the recommendations cited in the BRE guidance.

Any exceptions will be assessed on a case-by-case basis.

Conclusion on Planning Policy and Guidance

3.14 As set out above, all levels of planning policy and guidance support the optimisation of underutilised/ highly sustainable/ accessible sites.

3.15 The site is in an area in which it is considered fair to assume an expectation of development to take place.

3.16 Planning decision makers should apply default daylight and sunlight standards sensitively and flexibly so that such assessments do not prevent appropriate development coming forward on the right sites.

4. Information Relied Upon

4.1 A site inspection was undertaken in December 2019, during which site photographs and notes were taken.

Existing Buildings/Surrounding Buildings

4.2 The existing site and surrounds were based on an AccuCities 3D photogrammetry model, entitled "TQ2981_SE_HD_SOLID", obtained 16 July 2020. This was augmented with information from a site inspection undertaken in October 2018.

Proposed Buildings

4.3 The proposed development was represented based on drawings provided by the architects, Sixty Two Ltd, in June 2020.

4.4 The analyses were run in 'SOL', a specialist professional Daylight and Sunlight software developed specially for the purposes of conducting these types of assessment.

4.5 SOL has been accepted in various national planning appeals and is widely considered to be a highly accurate and robust means of conducting the assessments set out in the BRE Guidelines.

5. Approach and Methodology

5.1 The information set out in Section 3 above was used to produce a 3D assessment model representing the neighbouring, existing and proposed buildings in AutoCAD.

5.2 A set of technical studies were undertaken using 'SOL', a specialist plug tool for AutoCAD written by especially for the purposes of undertaking daylight and sunlight assessments by Dr Malcolm MacPherson, Dr Martin Howarth and Paul Fletcher of Waterslade Ltd.

5.3 SOL is considered to be accurate and well-established software for assessing light, having been accepted in numerous planning inquiries throughout the UK.

5.4 The BRE Guidance has formed the basis of the technical assessments undertaken and reported on.

5.5 We are aware that as of 7 May 2019, British Standards BS6-2:2008 has been withdrawn by BSI and superseded by BS EN 17037:2018 however, it is our understanding that London Borough of Camden planning policy has not been updated to make reference to this new standard as of the date of this report.

5.6 Our interpretation of the principles established by these documents is set out below.

Daylight & Sunlight Principles

5.7 The BRE Guidelines – Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice, Second Edition (2011) are well established and are adopted by most planning authorities as a scientific and empirical method for measuring daylight and sunlight in order to provide objective data upon which to apply the relevant planning policies.

5.8 The default targets set out in the BRE Guidelines are predicated on a comparatively low-rise suburban environment but recognise that decision makers should not rigidly apply the default standards and may apply alternative targets if appropriate depending on the context of the development being assessed.

5.9 Paragraph 1.6 in the Introduction of the Guidelines states:

> *"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 developer.*
>
> *Although it gives numerical guidelines, these should be interpreted flexibly because 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 an 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. "*

5.10 The 'flexibility' recommended in the Guidelines is a suggestion that a decision maker must consider the specific characteristics of each case being considered when determining whether alternative targets should be adopted.

5.11 Paragraph 2.2.3 of the Guidelines states:

> *"Note that numerical values given here are purely advisory. Different criteria may be used based on the requirements for daylighting in an area viewed against other site layout constraints.*
>
> *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 its fair share of light."*

5.12 In addition, where existing buildings have specific design features which self-limit access to daylight and sunlight such as projecting balconies, deep recesses, rooms greater than 5m deep or lit from one side only, the BRE Guidelines suggest ways in which such features may be taken into account in the assessment.

5.13 Paragraph 2.2.10 of the Guidelines states:

> *"... If an existing building contains rooms lit from one side only and greater than 5m deep, then a greater movement of the no sky line may be unavoidable."*

5.14 Paragraph 2.2.12 states:

> *"A larger relative reduction in VSC may also be unavoidable if the existing window has projecting wings on one or both sides of it or is recessed into the building so that it is obstructed on both sides as well as above."*

Daylighting

5.15 In respect of daylighting, the BRE Guidelines adopt different methods of measurement depending on whether the assessment is for the impact on existing neighbouring premises or for measuring the adequacy of proposed new dwellings.

5.16 These methods of measurement are summarised below.

Existing Neighbours

5.17 When considering the daylight received by existing residential buildings which neighbour a proposed development, the relevant recommendations are set out in Section 2.2 of the BRE Guidelines. The amount and quality of potential daylight received by existing neighbouring dwellings is measured using two different methods of measurement.

5.18 First, it is necessary to measure the Vertical Sky Component (VSC) followed by the measurement of internal Daylight Distribution (DD) by plotting the position of the 'existing' and 'proposed' No Sky Line (NSL) contour.

Primary Daylight Measure: VSC

5.19 VSC is measured at the mid-point on the external face of the window serving the room being assessed. The BRE Guidelines provide that the rooms to be assessed should be rooms where daylight is required, including living rooms, kitchens and bedrooms (paragraph 2.2.2).

5.20 For the purposes of the assessment, we have assessed any room which our research has indicated may be a "habitable room" within the meaning of the Housing SPG. Bathrooms, hallways and circulation space are

excluded from this definition. In addition, many local authorities make a further distinction in respect of small kitchens.

5.21 Where the internal area of a small kitchen limits its use to food preparation and is not of sufficient size to accommodate some other form of "habitable" use such as dining, the kitchen may not be classed as a "habitable" room in its own right and may therefore not be assessed as it is considered that there is likely to be greater reliance on electric lighting.

5.22 VSC is a 'spot' measurement taken on the face of the window and is a measure of the availability of ambient light from the sky from over the "existing" and "proposed" obstruction caused by buildings or structures in front of the window.

5.23 For VSC, the Guidelines state (at paragraph 2.2.7) that:

> *"If this VSC is greater than 27% then enough skylight should still be reaching the window of the existing building. Any reduction below this level should be kept to a minimum.*
>
> *If the VSC, with the new development in place, is both less than 27% and less than 0.8 times its former value, then the occupants of the existing building will notice the reduction in the amount of skylight."*

5.24 To put this in context, the maximum VSC value that can be received for a totally unobstructed vertical window is 40%. There are however circumstances where the existing/ baseline VSC value is already below 27% or falls below this level post-development.

5.25 In such circumstances, the BRE Guidelines state that the existing VSC value may be reduced by a factor of up to 0.2 (i.e. 20%) so that the value in the 'proposed' conditions retains at least 0.8 times its former value. The scientific reasoning is that existing daylight (and sunlight) levels can be reduced by a factor of 20% before the loss becomes noticeable to occupants.

5.26 The BRE Guidelines apply this factor of reduction to VSC (para 2.2.7), daylight distribution (para 2.2.9), sunlight (para 3.2.6) and overshadowing (para 3.3.11).

5.27 As it is measured on the outside face of the window, one of the inevitable shortcomings of VSC as a measurement tool is that it does not take account of the size of the window or the size or use of the room served by the window.

5.28 For this reason, the BRE Guidelines recommend internal DD to be measured in addition to VSC.

Secondary Daylight Measure: DD (or NSL)

5.29 The NSL contour plotted for the purpose of measuring internal Daylight Distribution identifies those areas within the room usually measured on a horizontal working plane set at table top level, where there is direct sky visibility.

5.30 This contour therefore represents those parts within the room where the sky can be seen through the window.

5.31 This second measure therefore takes account of the size of the window and the size of the room but is only more reliable than VSC when the actual room uses, layouts and dimensions are known.

5.32 In situations where layouts are not known, an approach commonly applied is to undertake an indicative assessment based on reasonable assumptions, however much of its accuracy and significance will depend upon the actual use of the room in question.

5.33 When interpreted in conjunction with the VSC value, the likely internal lighting conditions, and hence the quality of lighting within the room, can be assessed.

Sunlighting

Sunlight Measure for Proposed and Existing Buildings: APSH

5.34 Recommendations for adequate sunlight amenity are set out in Parts 3.1 (new development) and 3.2 (existing residential neighbours) of the BRE Guidelines. This makes reference to the recommendations set out in BS 8206-2:2008 in respect of the Annual Probable Sunlight Hours (APSH) methodology.

5.35 The availability of sunlight varies throughout the year with the maximum amount of sunlight being available on the summer solstice and the minimum on the winter solstice.

5.36 The APSH method is based on the long-term average of the total number of hours during the year in which direct sunlight reaches the unobstructed ground allowing for average levels of cloudiness.

5.37 APSH therefore also varies with location; however, for reference in London a figure of 1,486 hours is used for the annual unobstructed total.

5.38 The correct sunlight availability indicator for the location is then used to plot what percentage of the annual unobstructed total will reach the window reference point when obstructions and orientation are taken into account.

5.39 For new development, APSH calculations are taken at the centre of each window being assessed, on the plane of the inside face of the window wall. For existing neighbours, the outside face of the window wall is used.

5.40 In addition to variability due to location, the site layout is considered the most important factor affecting the duration of sunlight in buildings. This is divided into two main issues, site orientation and degree of obstruction (overshadowing).

5.41 For these reasons, the BRE guidelines state in respect of new development (at paragraph 3.1.6):

> *"A south-facing window will, in general, receive most sunlight, while a north facing one will only receive it on a handful of occasions."*

5.42 In respect of sunlighting for existing neighbours the BRE guidelines state (at paragraph 3.2.3):

> *"To assess loss of sunlight to an existing building, it is suggested that all main living rooms of dwellings, and conservatories, should be checked if they have a window facing within 90° of due south."*

5.43 The BRE guidelines state (at paragraph 3.1.2):

> *"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, where people prefer it in the morning rather than the afternoon."*

5.44 Paragraphs 3.2.5 and 3.2.6 of the BRE Guidelines sets the following recommendations: -

> *"If this window point can receive more than one quarter of APSH, including at least 5% of APSH in the winter months between 21 September and 21 March, then the room should still receive enough sunlight." (paragraph 3.2.5)*
>
> *"Any reduction in sunlight access below this level should be kept to a minimum. If the available sunlight hours are both less than the amount above and less than 0.8 times their former value, either over the whole year or just during the winter months (21 September to 21 March), then the occupants of the existing building will notice the loss of sunlight; if the overall annual loss is greater than 4% of APSH, the room may appear colder and less cheerful and pleasant. "(paragraph 3.2.6)*

5.45 To summarise the above, the default recommendation to meet occupant's sunlight expectations is 25% APSH, of which 5% should be in winter months. Where existing windows do not face within 90° of due south, as set out in the BRE guidance these were not assessed.

5.46 Where this recommendation is not met for the existing neighbouring properties a comparison with the existing condition is reviewed. If the ratio reduction is within 0.8 of its former value (in other words less than 20% reduction of existing/baseline APSH) then the sunlight loss will not be noticeable by the occupants.

5.47 The BRE guidelines add a further check of the overall annual loss, stating that when this is greater than 4% APSH the dwelling may be adversely affected. There is a clear emphasis on the primary requirement for sunlight amenity being in living rooms and conservatories.

5.48 The BRE guidance identifies the main influencing factors affecting access to available sunlight as site orientation and degree of obstruction. When considering existing neighbours these factors are clearly outside the control of the designer.

Flexibility

5.49 As set out in the BRE Guideline, the default recommendations are "purely advisory" (paragraph F1) and "should be interpreted flexibly" (paragraph 1.6).

5.50 This does not mean that the default recommendations and targets within the Guidelines can be disregarded but, instead, any 'flexibility' that is used after applying the default recommendations should be founded on sound scientific principles that can be objectively supported and justified.

6. Assessment Results and Commentary: Impact to Existing Neighbouring Dwellings

6.1 LB Camden confirmed that the impact to neighbouring dwellings assessment would need to consider impacts to the applicant's adjacent property at 22 Hanway Street which is in close proximity to the proposals, specifically a storeroom which is considered to have the potential to be a bedroom in future.

6.2 This relationship is shown on the attached existing and proposed site plans at Appendix I (drawings HA157/02: BRE/01-04), which should be read in conjunction with the associated results tables at Appendix II.

22 Hanway St

6.3 This property is understood to not currently be in use as a dwelling, however the LPA has raised concerns regarding its potential future use as a dwelling and therefore how its natural light amenity would be affected by the proposed development.

6.4 It should be noted that the affected room is located at the rear of the property, with its main living area located on the opposite side of the building, facing south over Hanway Street. Its main living space would therefore be unaffected by the proposed development.

6.5 The BRE and BS guidance both consider natural light to bedrooms as being less important, given their mainly night time use.

Daylight

Daylight Measure 1: VSC

6.6 The VSC assessment confirmed that the storeroom at present achieves 16.91%VSC, which is materially below the default BRE recommendation of at least 27%. This is consistent with the dense, central context whereby the default recommendations are inappropriate, and therefore flexibility needs to be applied.

6.7 Post development, the VSC value would reduce by around 5%VSC, considered small.

6.8 Given the smaller numbers involved, this inevitably leads to a disproportionately high percentage reduction value when expressed in this way, i.e. 33.12%, despite being a small actual difference.

6.9 The window would retain 11.31%VSC, considered commensurate/ typical for the context.

Daylight Measure 2: NSL

6.10 The NSL assessment showed no difference to the existing NSL value, retaining 76.73% of its area with a direct view of sky from desktop height.

6.11 This is marginally below the default BRE recommendation of 80% and therefore in this context considered exemplary.

Daylight Measure 3: ADF

6.12 The default BRE guidance does not generally recommend the use of ADF for assessing neighbours.

6.13 However, at Appendix F it states the following:

> *"F8 However, there are some situations where meeting a set ADF target value with the new development in place could be appropriate as a criterion for loss of light:*
>
> *...*
>
> *(iii) where the developer of the new building also owns the existing nearby building and proposes to carry out improvements to the existing building (e.g. by increasing window sizes) to compensate for the loss of light...*
>
> *(iv) where the developer of the new building also owns the existing nearby building and the affected rooms are either unoccupied or would be occupied by different people following construction of the new building."*

6.14 As such, the ADF assessment is considered to also be of relevance.

6.15 The ADF assessment confirmed that the room currently achieves 1.46%ADF and would retain 1.33%ADF, exceeding the default BS target of at least 1.0%ADF for bedroom use.

Sunlight

APSH

6.16 The BRE guidance recommends that main living rooms should be assessed if the new development is situated within 90 of due south.

6.17 This does not apply to this scenario, given the living area at 22 Hanway Street faces South whereas the development is to the north.

6.18 The proposal also lies within 90 of due north of the potentially affected window at 22 Hanway St.

6.19 For the above reasons, the BRE guidance would not require an APSH assessment.

Overall Conclusion: 22 Hanway Street

6.20 The range of technical assessments showed that the property would not be materially affected by the proposed development.

7. Assessment Results and Commentary: Amenity Provision within the Proposed Development

Daylight and Sunlight to Proposed Habitable Rooms

7.1 A set of analyses were undertaken within the proposed dwelling, considering skylight amenity provision within the proposed habitable rooms. The assessment drawings HA157/01: BRE/02 and /03 are appended at Appendix I together with results tables at Appendix II.

Living/ Kitchen Area

Daylight Measure 1: ADF

7.2 The proposed living/kitchen/dining area would achieve 1.25%ADF.

7.3 This is below the default BRE/BS recommendation for combined spaces which include kitchen use. As set out above, the context is one in which the default recommendations are inappropriate.

7.4 In similar circumstance, the default target value for living areas, i.e. 1.5%ADF, has been accepted as an alternative. The recorded value of 1.25%ADF is marginally below this.

Daylight Measure 2: NSL

7.5 The combined living area would achieve 18.75% of its area with a direct view of sky from desktop height.

7.6 This is below the default recommendation of at least 80%NSL.

7.7 The result is considered to be due to the first-floor location and the unusually narrow width/ relationship across Hanway Place, as demonstrated by the site photograph below.

7.8 In such an unusual situation it is considered impossible to achieve the default recommendations, even if the elevation was heavily glazed, which would in turn lead to thermal performance problems.

7.9 The NSL value is considered typical/ commensurate with the context.

Figure 2: site photograph showing unusually narrow width of Hanway Place, restricting sky visibility

Sunlight Measure: APSH

7.10 The proposed living area faces north across Hanway Place and therefore occupants are considered unlikely to expect sunlight, most likely balancing its absence against the beneficial amenity value of the location.

7.11 For the above reasons an APSH assessment is not required.

Bedrooms

7.12 The proposed development features two bedrooms at mezzanine level. The BRE guidance considers bedrooms as "less important" in terms of requirement for natural light, given their mainly night-time usage.

Primary Daylight Measure: ADF

7.13 Both bedrooms would achieve the default recommendation of at least 1% ADF.

Secondary Daylight Measure: NSL

7.14 The proposed bedrooms would achieve 57.59% and 57.34%NSL, which is below the default recommendation of 80% and considered commensurate with the context.

Sunlight Measure: APSH

7.15 For similar reasons as discussed for the proposed living areas above, no ASPH assessments were undertaken of the bedrooms.

7.16 Overall Conclusion: Amenity Provision within the Proposed Development

7.17 As is entirely common in urban environment, the default BRE/BS targets have not been met in all cases within the proposed habitable rooms.

7.18 The outlook across Hanway Place is considered highly unusual, in that it is only one vehicle wide and features tall buildings opposite.

7.19 It is a context in which the default targets are impossible to meet in all cases. In order to do so would involve large areas of glazing, which would cause thermal performance issues.

7.20 We understand that the proposal is for private market sale and as such, potential occupiers would be able to consider whether the amenity value of the location would offset the associated inevitably reduced natural light access.

8. Summary and Conclusions

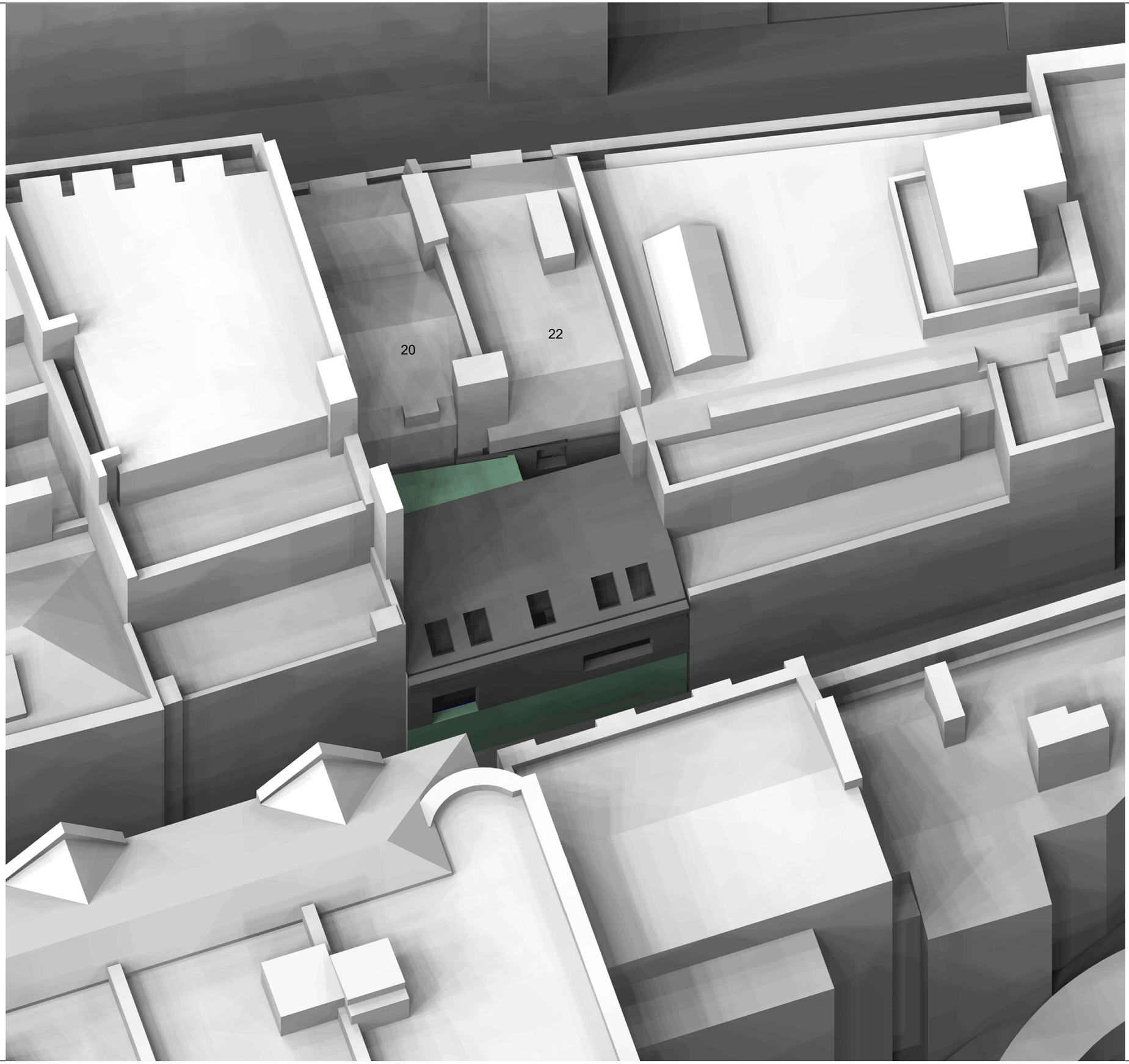
8.1 As predicted by the BRE, the context is one in which their default recommendations have not been met. The BRE and planning policy state that in such situations alternative targets are more appropriate.

8.2 The assessments of the proposed development are considered to have demonstrated an acceptable level of natural light post development, both in respect of the existing neighbour nearest the proposals and within the proposed dwelling when having regard for this inherent flexibility, dense/constrained context and private tenure.

8.3 The daylight and sunlight results need to also be considered as part of the overall amenity balance, whereby location is clearly of prime importance for future and current occupants. This is arguably not a location which people would choose to move to based on a desire to enjoy high levels of natural light.

8.4 In overall conclusion the proposed development is therefore considered to meet local and national planning policy related to daylight and sunlight.

Appendix I
Assessment Drawings



Sources of Information

EXISTING BUILDING
INFO RECEIVED 23 JUNE 2020
Sixty two Limited
1689-01 A
1689-02 C
1689-03 C
1689-04 G
1689-05 G
1689-06 A
1689-11 A

SURROUNDING BUILDINGS
INFO 3D MODEL ACCUCITIES
TQ2981_SE_HD_SOLID

PROPOSED BUILDING
INFO RECEIVED 23 JUNE 2020
Sixty two Limited
1689-01 A
1689-02 C
1689-03 C
1689-04 G
1689-05 G
1689-06 A
1689-11 A

AVISON YOUNG
08449 02 03 04
65 Gresham Street, London, EC2V 7NQ
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Project Name
20 HANWAY STREET, LONDON
W1T 1UG

Client
Hanway developments Ltd

Drawing Title
Proposed 3D View

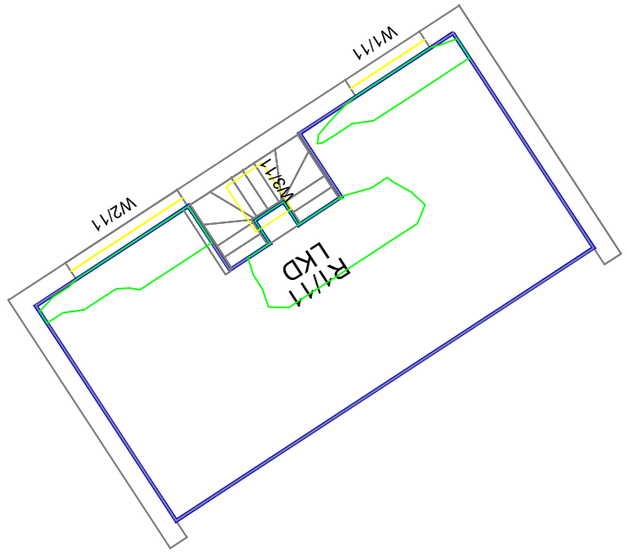
Drawn By	Chk'd By	Scale @ A3	Date
AH			16 JULY 2020

Project No.	Drawing No.	Revision
HA157/01	BRE02	-

Daylight

A3

First Floor



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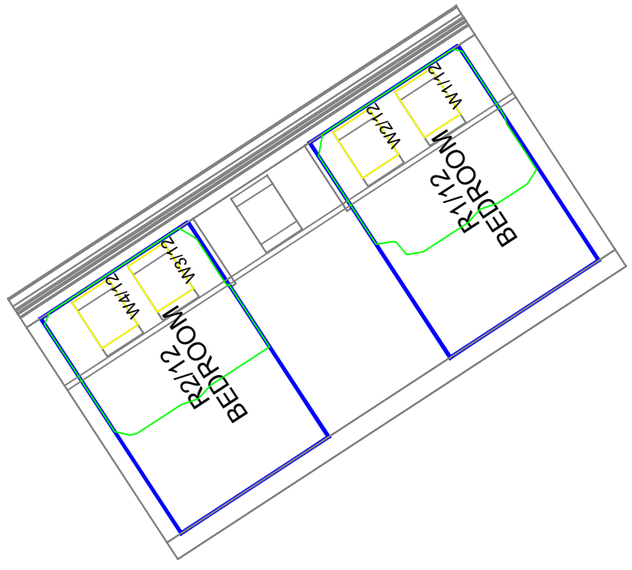
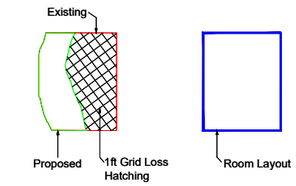


Legend

Daylight



Existing No-Sky Line Contour

Proposed No-Sky Line Contour

Sources of Information

EXISTING BUILDING
INFO RECEIVED 23 JUNE 2020
Sixty two Limited
1689-01 A
1689-02 C
1689-03 C
1689-04 G
1689-05 G
1689-06 A
1689-11 A

SURROUNDING BUILDINGS
INFO 3D MODEL ACCUCITIES
TQ2981_SE_HD_SOLID

PROPOSED BUILDING
INFO RECEIVED 23 JUNE 2020
Sixty two Limited
1689-01 A
1689-02 C
1689-03 C
1689-04 G
1689-05 G
1689-06 A
1689-11 A

N

AVISON YOUNG

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65 Gresham Street, London, EC2V 7NQ
www.gva.co.uk

Project Name
20 HANWAY STREET, LONDON
W1T 1UG

Client
Hanway developments Ltd

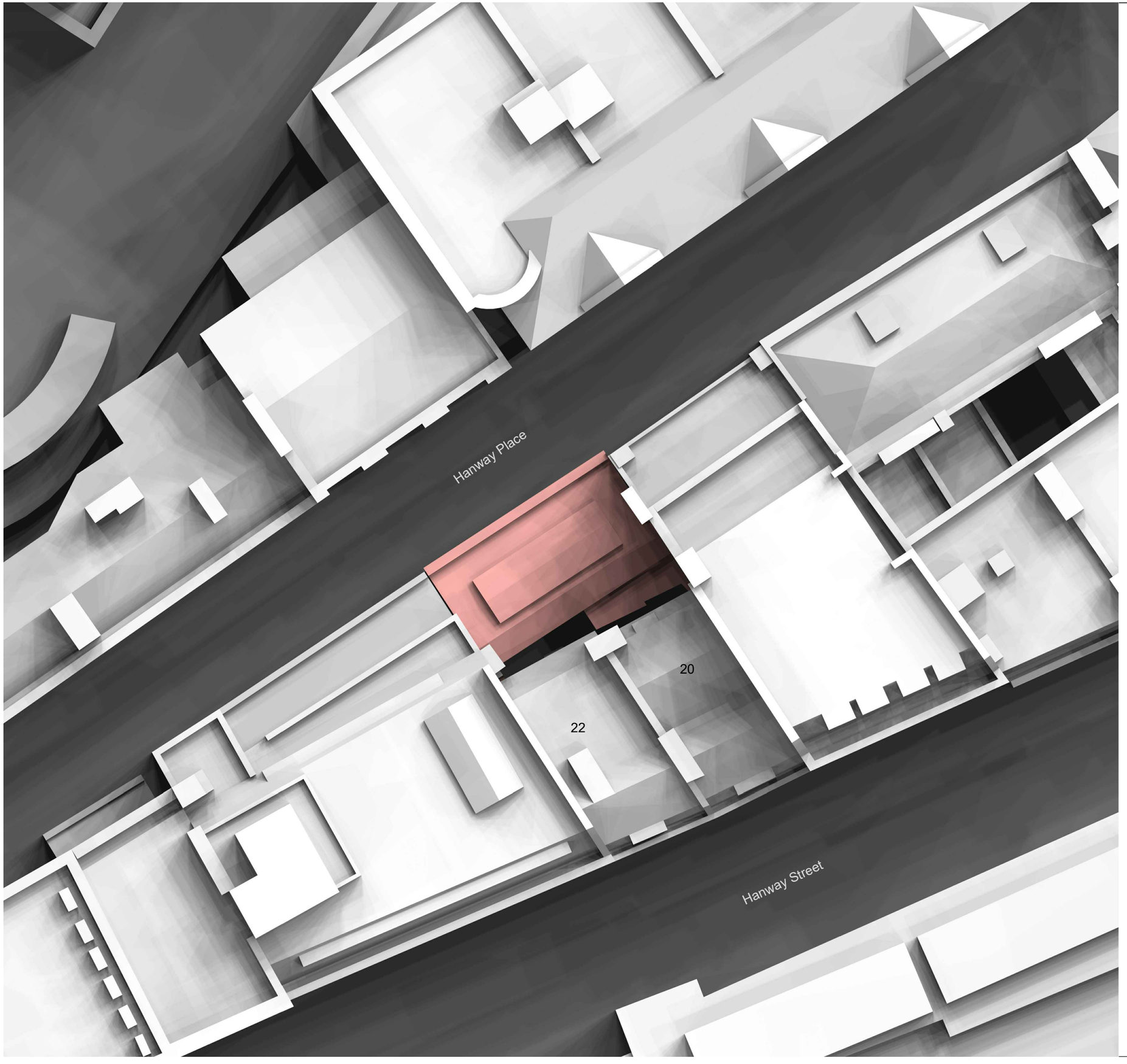
Drawing Title
No sky-line contours for
Proposed 20 Hanway Street

Drawn By	Chk'd By	Scale @ A3	Date
AH		1:100	16 JULY 2020

Project No.	Drawing No.	Revision
HA157/01	BRE03	-

Daylight

A3



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Project Name
20 HANWAY STREET, LONDON
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Client
Hanway developments Ltd

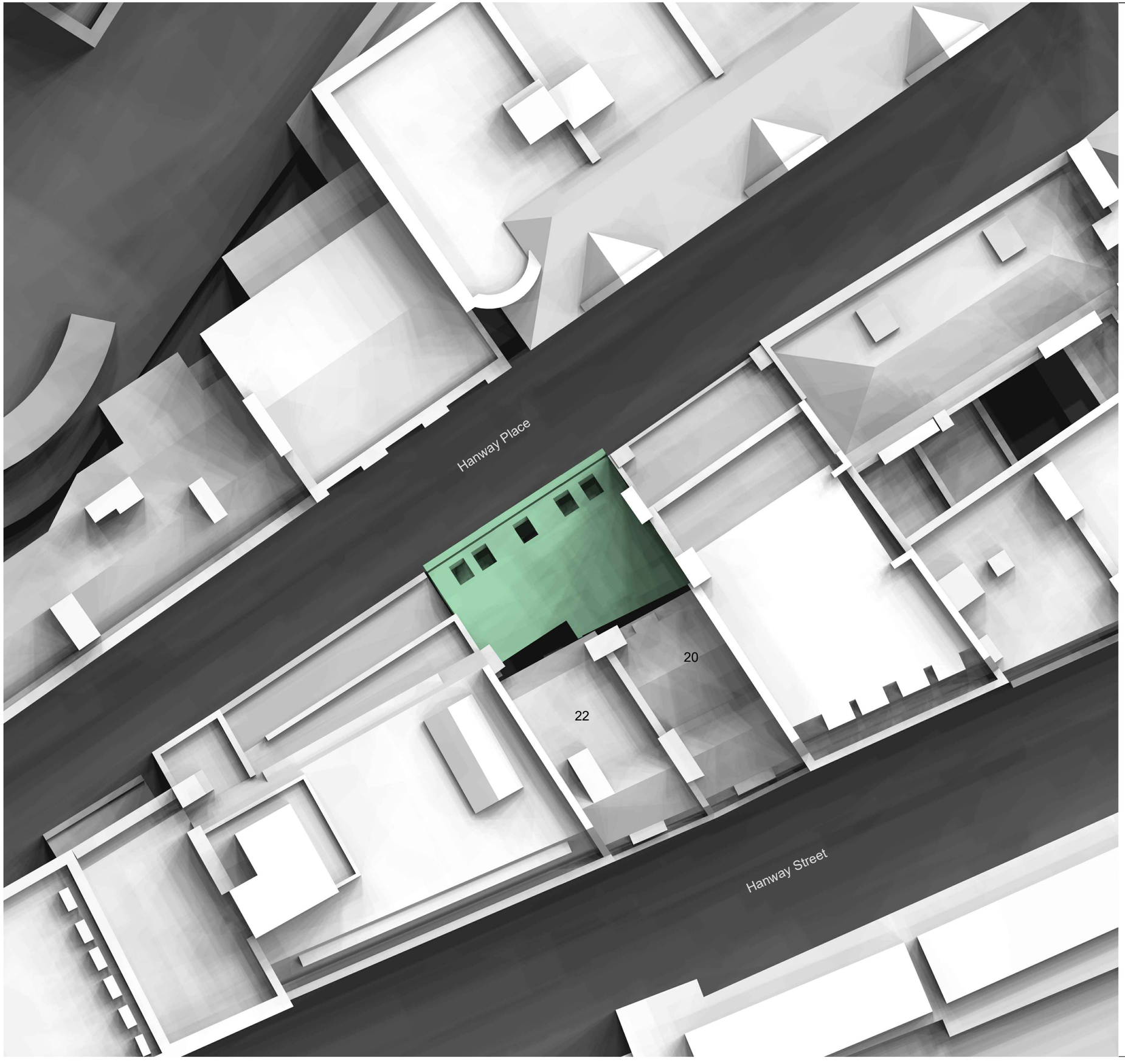
Drawing Title
Existing Site Plan

Drawn By	Chk'd By	Scale @ A3	Date
AH			16 JULY 2020

Project No.	Drawing No.	Revision
HA157/01	BRE01	-

Daylight

A3



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Project Name
20 HANWAY STREET, LONDON
W1T 1UG

Client
Hanway developments Ltd

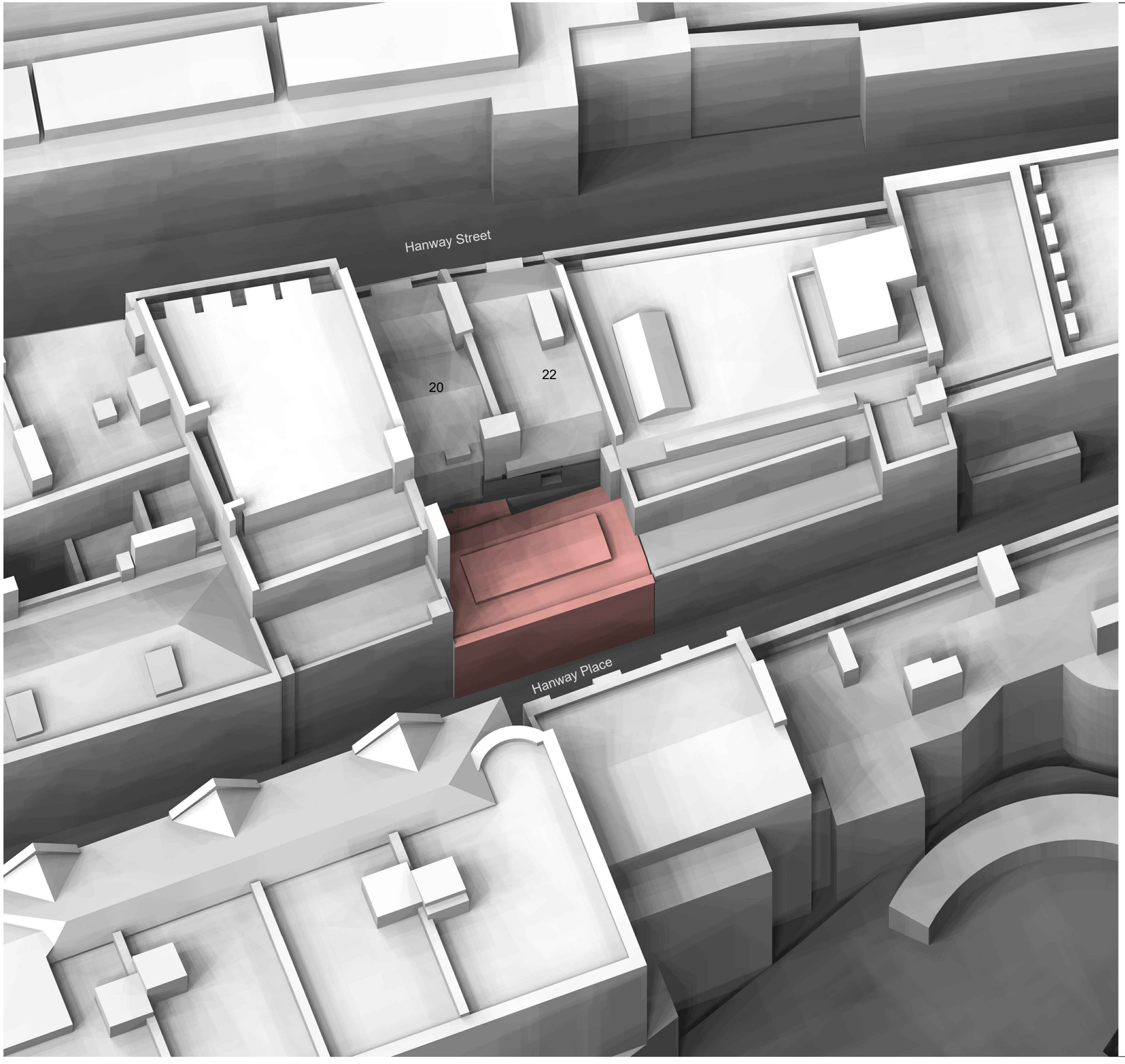
Drawing Title
Proposed Site Plan

Drawn By	Chk'd By	Scale @ A3	Date
AH			16 JULY 2020

Project No.	Drawing No.	Revision
HA157/01	BRE02	-

Daylight

A3



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Project Name
20 HANWAY STREET, LONDON
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Client
Hanway developments Ltd

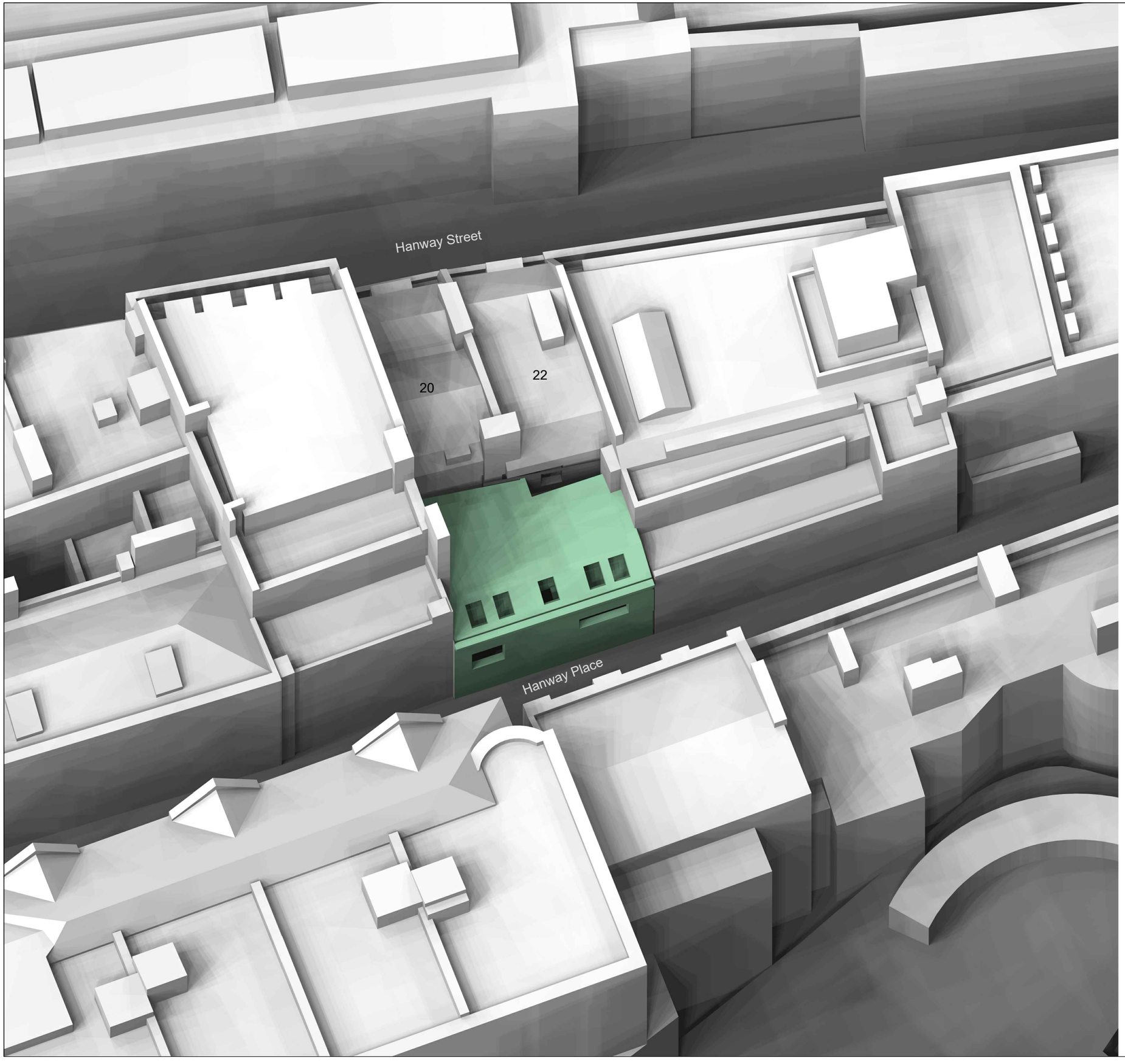
Drawing Title
Existing 3D View

Drawn By	Chk'd By	Scale @ A3	Date
AH			16 JULY 2020

Project No.	Drawing No.	Revision
HA157/01	BRE03	-

Daylight

A3



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Project Name
20 HANWAY STREET, LONDON
W1T 1UG

Client
Hanway developments Ltd

Drawing Title
Proposed 3D View

Drawn By	Chk'd By	Scale @ A3	Date
AH			16 JULY 2020

Project No.	Drawing No.	Revision
HA157/01	BRE02	-

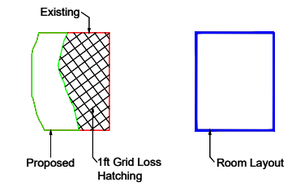
Daylight

A3

Second Floor

Legend

Daylight



Existing No-Sky Line Contour

Proposed No-Sky Line Contour

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Client
Hanway developments Ltd

Drawing Title
No sky-line contours for
Proposed 20 Hanway Street

Drawn By	Chk'd By	Scale @ A3	Date
AH		1:75	16 JULY 2020

Project No.	Drawing No.	Revision
HA157/01	BRE03	-

Daylight

A3

Appendix 2
Results Tables

20 Hanway Street

Daylight and Sunlight Analysis Results
Job 01
16-Jul-20

Room/Floor	Room Use	Window	%VSC	%ADF	No Sky % of Room	%Sun Summer	%Sun Winter	%Sun Total
20 Hanway Street								
1st Floor								
R1/11	LKD	W1/11	6.71	1.25	18.75%	N/A	N/A	N/A
		W2/11	7.93			N/A	N/A	N/A
		W3/11	60.00			N/A	N/A	N/A
2nd Floor								
R1/12	BEDROOM	W1/12	48.79	2.91	57.59%	N/A	N/A	N/A
		W2/12	55.33			N/A	N/A	N/A
R2/12	BEDROOM	W3/12	61.51	3.30	57.34%	N/A	N/A	N/A
		W4/12	61.26			N/A	N/A	N/A

20 Hanway Street

Daylight analysis results
Job 02
16-Jul-20

Room/Floor	Room Use	Window	%VSC			% Daylight Factor			Proposed No Sky	
			Exist	Prop	% Loss	Exist	Prop	% Loss	% of Room Area	% Loss of Existing
22 Hanway Street										
2nd Floor										
R1/22	BEDROOM	W1/22	16.91	11.31	33.12%	1.46	1.33	9.18%	76.73%	0.00%

Contact Details

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