

Mr Gregory Francis comments

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Robust consideration of glare and overshadowing at the early stages is essential to deliver this policy aim. Confirming the accuracy of assessments and reporting are critical to achieving this.

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Efficient and optimal density should have regard for resultant daylight and sunlight. This requires accurate and robust analysis and reporting to avoid errors.

Delivering appropriate amenity has similar considerations, including a holistic review of the factors which determine this.

The Policy summary mentions Daylight and Sunlight several times.

As a Daylight/Sunlight specialist my main overriding comment would be to emphasise the importance of appropriate competence and skill if the correct balance is to be achieved between the aims of this policy and best practice/ recommendations for natural light provision.

The ever increasing and sophisticated understanding of the importance of natural light, as well as more accurate methods of assessment means the matter requires robust advice.

Paragraph "B" mentions children, disabled and older people. Current research tells us these are all groups which would especially benefit from good natural light provision, again emphasising the importance of ensuring the accuracy and robustness of technical assessments and reporting.

With larger internal dimensions (as proposed in the "Private Internal Space" section), there is more internal surface area to light via natural illumination. Ensuring adequate illumination of larger dwellings requires professional advice at the design stage if they are to achieve this when built.

With minimum depths and widths of balconies being proposed (as per "Private Outside Space" section), again care and attention to detail will be required to ensure this does not inadvertently detrimentally affect daylight and sunlight access.

Balconies, both on neighbouring and proposed dwellings, can have a material impact on natural light access if poorly designed/located.

Whilst it may seem logical that dual aspect dwellings (as per paragraph "E") should provide significantly greater natural light amenity for occupants, this is not necessarily always the case. Access to natural light is a complex three-dimensional consideration, involving factors such as the degree of obstruction, orientation, room layout and type/ size of glazing.

Introducing a second aspect to a dwelling would not necessarily overcome all of these limiting factors.

Whilst I support flexible determination of daylight and sunlight "sufficiency" (as per paragraph "F"), I think there is an inherent risk if simply limiting this to consideration of typical current values in the immediate context.

The risk could be that areas of London which currently experience poor natural light will continue to do so (as that is considered "typical" and therefore "sufficient" for the context), whereas areas with good or high levels will likewise continue to do so.

In this scenario there would be little scope for areas with historic or current poor light levels to improve in future and could result in a "race to the bottom" in terms of natural light provision.

This would also be contrary to several carefully Local Authority policy aims for Daylight and Sunlight, especially in historic boroughs of Central London, where these often state that opportunities may be taken to improve natural light provision post-development.

I therefore consider it to be of great importance when aiming to determine natural light "sufficiency" that reference should also be made to a wider set of informed benchmarks rather than simply the immediate context, including planning policy/ aims and best practice/standards.

Proper and balanced consideration is essential if we are to avoid the risk of condemning areas of London to poor natural light indefinitely.

Countless planning decisions have already managed to avoid this to date and care needs to be taken not to now limit a process that already works well and replace it with one which could potentially be more restrictive.

Taking a more informed approach certainly would not mean inhibiting high-density development (as has been demonstrated in a huge number of planning decisions and visibly evident from the high-quality dense development which has been successfully delivered across London over the last decade).

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Preference for dual aspect dwellings is generally positive in terms of daylight and sunlight provision.

However I would comment that whilst dual aspects should increase "potential", this is also heavily dependent on several other factors such as site orientation and obstructions.

I would therefore recommend the matter be appropriately considered in the round to establish whether a second aspect would make a material difference rather than simply insisting on them in all circumstances.

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In the context of making the most efficient use of sites, in the interests of pragmatism and realistic compromise care needs to be taken that this policy is not too restrictive i.e. not permitting any north-facing single aspect dwellings.

The reality of viable development, especially in town and city centres, is that there are numerous design considerations other than low sunlight access. It may simply be impossible to achieve an efficient design which does not feature some single aspect north facing dwellings.

All current guidance on daylight and sunlight specifically state that their recommendations should not be used as an instrument of planning policy, rather to be applied flexibly. On sunlight, the guidance documents confirm it is not always possible to have no north facing dwellings as there are so many concerns to address.

As an experienced Daylight and Sunlight specialist, I believe this policy should instead be more flexible, reading that north-facing single aspect dwellings "should be avoided" or "should be minimised".

There are other ways to ensure occupants of single aspect north facing dwellings have access to sunlight amenity, through careful and considerate design.

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As part of delivering and supporting the aims of this policy, it will be important to ensure a good level of sunlight into the private open space given the associated health benefits as well as the positive contribution to sustaining plant life/ greenery.

In dense development this is generally simpler to achieve at rooftop level, where there is normally greater access to direct sunlight.

Accuracy of sunlight assessments will be imperative in order to robustly assess provision.

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In respect of daylight and sunlight provision, having consideration of more than one typology/ layout will help inform decision making, as each will inevitably have inherent strengths and weaknesses.

Robust and thorough consideration of feasible options and the accuracy of natural light assessments and reporting is imperative if reliance on them is to help justify closer building separation distances.

Errors in assessment and reporting will risk condemning future occupants to inhabit dark, poorly lit dwellings.

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Achieving the policy aims in respect of the quality and fitness of purpose in respect of dwellings and outside space again emphasises the importance of accurate technical assessments and informed reporting by competent consultants.

"Adequacy" of daylight provision needs to be carefully considered in the round, including local planning policy/aims, academic best practice and the realities of the site and its location.

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In respect of Daylight and Sunlight provision, this policy again highlights the importance of robust and fully reliable technical assessments and reporting to ensure their accuracy and fairness of representation.

I would fully support para C in particular, which aims to increase the scrutiny of detail design proportionately with higher density.

In order to achieve this I would recommend that policy states as mandatory that daylight /sunlight studies and reporting is only to be undertaken by a competent and suitably qualified consultant, given its fundamental importance to subsequent decision making.

This should be made explicit in the list of mandatory requirements for the validation of a planning application as well as ensuring the submitted assessment and report is subject to cross checking.

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Daylight and Sunlight considerations can be addressed at the very earliest stages, inputting directly into the masterplanning stages.

Even before having any detailed layouts, optimal block layouts and spacing can be considered in respect of delivering appropriate natural light amenity within dwellings and open spaces, robustly balanced against adequate/appropriate density, academic best practice and policy.

Key to this will again be to ensure competent and experienced daylight/sunlight consultants are appointed, whose work is able to withstand independent scrutiny as otherwise the policy aims may not be fully delivered.

If the masterplanning stages do not properly address daylight and sunlight matters, this will become increasingly complicated if not impossible to achieve later during the detail design stages.

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Para A seeks "attractive" and "easy to maintain" public realm. Adequate and proper sunlight provision would support this, by providing appropriate areas and duration of sunlight as well as preventing the accumulation of mould and slime due to excessive shadowing.

Para E seeks a mutually supportive relationship between spaces surrounding buildings and their uses.

Considering this as an integral part of the overall design from the outset, including the quality and pattern of sunlight provision can help support this.

Para I can be supported by robust daylight and sunlight design, which accurately measures areas of shade and shelter. Simple shadow diagrams are unlikely to provide a sufficiently detailed picture and instead requires more sophisticated techniques.

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Potential overshadowing and glare effects to existing or proposed neighboring public realm needs to be robustly assessed at the early stages.

1) Visual Impacts

para g) - the solar glare assessment and subsequent reporting needs to be thoroughly reliable and capable of scrutiny if this policy aim is to be delivered.

2) Functional Impacts

para g) the potential for overshadowing to interfere with solar energy generation potential needs to be addressed as early as possible in the design to ensure it is not simply an after thought. The pre-app stage is an ideal point to discuss how this has been robustly addressed.

3) Environmental Impacts

a) I fully support this policy and would just reiterate the importance of ensuring the accuracy and robustness of reporting and assessments as early as possible.

4) Cumulative Impacts

a) all of the above should also be modelled in the cumulative scenarios, again ensuring robust, accurate assessments and reporting.

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I would support this and suggest that local planning policy madates this as a formal validation requirement. The technology already exists and it is simply a case of ensuring its use.

This can be combined with consideration of daylight, sunlight, overshadowing and solar glare/dazzle to give a holistic overall picture of a tall buildings impact.

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Again emphasises the importance of robust and accurate natural light assessments and reporting which stands up to scrutiny and cross-checking.

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Emphasises importance of robust and accurate assessments and reporting capable of cross checking/ scrutiny.

Page: [Policy H2 Small sites](#)

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The establishing of "satisfactory" levels of daylight and sunlight needs to be robustly determined. Ensuring no harm to amenity of existing properties requires accurate and competent design advice, especially if proposing development on a tightly constrained site.