LOCAL PLANNING AUTHORITY REF: PLAN/2019/1176

TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)

APPEAL UNDER SECTION 78 OF THE TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED) BY GOLDEV LIMITED AGAINST THE DECISION OF WOKING BOROUGH COUNCIL IN REFUSING PLANNING PERMISSION FOR THE DEMOLITION OF ALL EXISTING BUILDINGS AND STRUCTURES AND REDEVELOPMENT OF THE SITE FOR A MIXED USE DEVELOPMENT INCLUDING A REPLACEMENT STADIUM WITH ANCILLARY FACILITIES PLUS RESIDENTIAL ACCOMMODATION AT LAND SOUTH OF KINGFIELD ROAD AND EAST OF WESTFIELD AVENUE, WESTFIELD AVENUE, WESTFIELD, WOKING, SURREY, GU22 9PF

APPEAL REFERENCE APP/A3655/W/20/3265969

PROOF OF EVIDENCE

OF

LJ DUNFORD BSc (hons) MScSurv FRGS

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1. Qualifications & Experience

1.1 Liam J Dunford BSc(Hons) MSc (Surv) FRGS. I advise exclusively on Daylight/Sunlight and Rights of Light matters. I have practiced in this specialism exclusively for over 15 years. I trained with Gordon Ingram before joining Savills to start and run the Daylight/Sunlight team before being promoted to Director. I founded Point 2 Surveyors in 2014. We are a leading consultancy within this field with over 75 staff. We are unique in that we design and write our own software. Aside from providing client consultancy we are also trusted to provide daylight software/calculations to other leading practices. Prior to specialising as a Daylight consultant, I was a Naval Officer working on Hydrographic survey vessels. I hold a Master's degree in Surveying from the University of Reading, where I specialised in daylight. I regularly present lectures and CPD talks on these subjects; these have included RICS and the Property Bar Association. I am a member of the Chartered Institution of Building Services Engineers ('CIBSE') daylight group and sat on the BRE working group for the latest edition of BRE Guide 209; *Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice* (2011)[1]. I am the technical author and contributor to the leading text '*The Law of Rights of Light*' by Jonathan Karas QC**.**

1.2 My work includes detailed design stage advice, to ensure a developing scheme reacts appropriately to its context and provides amenity within properties and to open space, as well as the preparation of final planning reports assessing the impact of a Scheme by reference to the appropriate planning policy. I have substantial experience, having worked directly on well over several hundred projects and knowledge of Point 2's wider projects that amount to over 2200. These have ranged from small residential extensions to large City of London towers and mixed-use master-planning throughout London and the UK. A selection of current clients

[1] Refer to Core Documents CD4.22

includes Whitbread, Land Securities, Notting Hill Housing Association, Royal London, Legal & General, Crossrail/TFL, HM Government of Gibraltar and various local authorities such as London Borough of Islington, London Borough of Camden, London Borough of Hounslow, City of Westminster and Harpenden Town Council. I often provide third party reviews for major developments and have prepared proof of evidence/expert witness reports for various planning appeals and court cases. We have recently been commissioned to undertake daylight research for the GLA and City of Westminster.

2. Introduction

2.1 I am instructed by GolDev Ltd ("the Appellant"). Firstly, to calculate the daylight impact posed to Beech House, Hazel House and Elm View. And secondly, to come to a professional opinion as to the acceptability of the proposed situation. This proof does not consider the loss of Sunlight to any property or the loss of daylight to any property other than the aforementioned as these have not been raised by the LPA as part of their case.

2.2 The approach I have used to come to my opinion is set out in section 4 of this proof. I am aware of the work undertaken by EB7 as part of the original submission. All calculations and research I have relied upon have been undertaken by me and my team from first principles.

2.3 This proof relates to the refused planning application scheme (Woking Borough Council Reference **PLAN/2019/1176)**;

> ***Redevelopment of site following demolition of all existing buildings and structures to provide replacement stadium with ancillary facilities including flexible retail, hospitality and community spaces, independent retail floorspace (Classes A1/A2/A3) and medical centre (Class D1) and vehicle parking plus residential accommodation comprising of 1,048 dwellings (Class C3) within 5 buildings of varying heights of between 3 and 11 storeys (plus lower ground floor and partial basement levels) on the south and west sides of the site together***

with hard and soft landscaping, highway works, vehicle parking, bin storage, cycle storage, plant and other ancillary works including ancillary structures and fencing/gates and provision of detached residential concierge building

2.4 The proof is structured in the following main sections and supporting appendices:

- Section 3 - Executive Summary
- Section 4 - Approach
- Section 5 - Assessment Methodology
- Section 6 - Setting Appropriate Alternative Targets
- Section 7 - Assessment of Effects on Daylight Amenity
- Section 7.1 - Daylight to Beech House
- Section 7.2 - Daylight to Hazel House
- Section 7.3 - Daylight to Elm View
- Section 8 - Conclusion

Appendices A-P contain the following data and supporting information:

- Appendix A - Assessment Methodology
- Appendix - Standard Survey Limitations
- Appendix C - Existing Drawings
- Appendix D - Proposed Scheme Drawings
- Appendix E - Section AA – Appropriate Development Angles
- Appendix F - Beech House: Tabular VSC, ADF, NSL Results, Window Maps and NSL Contour Plots
- Appendix G - Hazel House: Tabular VSC, ADF, NSL Results, Window Maps, NSL Contour Plots and photograph showing roof overhang
- Appendix H - Elm View: Tabular VSC, ADF, NSL Results, Window Maps and NSL Contour Plots

3. Executive Summary

3.1 This Proof of Evidence has been prepared to respond to the Woking Borough Council ("the Council") decision to refuse the planning application on the site at Kingfield Road, Woking GU22.

3.2 The refusal in part cited daylight in respect of Beech House, Hazel House and Elm View, each of which are residential properties. Beech House and Hazel House are located to the west of the site across Westfield Avenue. Elm view is located adjacent to the northern site boundary.

3.3 Daylight is assessed by reference to The BRE Guide to Good Practice ("the BRE Guide")[2]. It suggests using the Vertical Sky Component (VSC) and No-Sky Line (NSL) tests. No other common guidance exists. The BRE Guide sets out to establish if the loss of light is noticeable, it does not consider in any detail the level of retained daylight and its suitability or not. It applies equally to rural England as it does in the most-dense city centres and areas of regeneration such as this site. The BRE Guide states on page 1 that: *"The advice given here is not mandatory and the guide 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 since natural lighting is only one of many factors in site layout design."*[3]

3.4 The National Planning Policy Framework (paragraph 123 (c))[4] focuses on whether satisfactory levels of amenity will remain after development, at the same time emphasising the importance of flexibility and the use of targets alternative to those set out in the BRE Guide.

3.5 The Appeal site is low rise and many areas close to the site boundary are currently vacant as they are being used as open-air carparking space. Overall existing levels of daylight to the

[2] Refer to Core Documents CD4.22
[3] Refer to Core Documents CD4.22 paragraph 1.6
[4] The Ministry of Housing Communities & Local Government National Planning Policy Framework 2019

surrounding properties are therefore extremely good, and any massing that sets to meet appropriate densities for an area designated for regeneration will not fully meet BRE Guidance.

3.6 I have carefully reviewed the impact in terms of daylight on Beech House, Hazel House and Elm View. Although there are effects, those effects have to be considered against the background of Government policy. Because available land is finite balance must be struck between the importance of light and the importance of the construction of homes.

3.7 The retained levels of daylight to all 3 of the properties will remain more than satisfactory after development. The technical metrics I have used are based upon my knowledge and experience as well as being supported by my peers. The effects are in my view acceptable and commensurate with similar sites and localities.

4. Approach

4.1 The Council set out that the principal issue to be considered at the Inquiry in relation to daylight is the significant harm to residential amenity though loss of daylight to Beech House (Sycamore Avenue), Hazel House (Sycamore Avenue) and Elm View (Kingfield Road).

The Daylight, Sunlight, Overshadowing, Light Pollution and Solar Glare Chapter of the Environment Statement prepared by Trium and EB7, defines the effects on these 3 properties in relation to daylight as having a moderate adverse impact. Having reviewed the Chapter, this classification has been established by consideration of the proportional reductions in daylight, and primarily by the proportional reductions in VSC. I note this conclusion is by reference only to calculation and not professional judgement. In the Rainbird case[5] the judge noted that the assessment of impact on daylight and sunlight amenity is a two-part process:

[5]Refer to Core Documents CD5.5 paragraphs 83-84

• First, as a matter of calculation, whether there would be a material deterioration in conditions,

• and second, as a matter of judgment, whether that deterioration would be acceptable in the particular circumstances of the case, including the local context.

4.2 Futhermore, the NPPF (paragraph 123 (c)) concentrates on whether satisfactory levels of amenity will remain, at the same time emphasising the importance of flexibility and the use of targets alternative to those set out in BRE Guide.

"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)."

5. Assessment Methodology

5.1 The BRE guidelines provide two principal measures of daylight for assessing the impact on properties neighbouring a site, namely Vertical Sky Component (VSC) and No-Sky Line (NSL). They also detail a third measure of daylight which gives more detailed consideration to overall amenity internally, namely Average Daylight Factor (ADF).

5.2 These measures of daylight are detailed at Appendix A.

5.3 To enable the calculations a 3D computer model of the existing site, the proposal and the relevant surrounding properties has been constructed. Appendix B sets out the Standard Survey Limitations.

5.4 Both the VSC and NSL methods of assessment focus on the proportional reductions in daylight, and whether these will be noticeable. It should be noted that the 3 assessments all provide a different informative in coming to a professional opinion on the extent of change, as well as whether the level of retained daylight would be considered acceptable.

5.5 Futhermore, it has been held on appeal that 'noticeable' is not to be equated with 'unacceptable'.

5.6 The following extract from the inspector's report on the West End Green site near Paddington[6] gives pragmatic guidance on the interpretation of the default BRE criteria:

"13.103 According to the BRE Guide, a Vertical Sky Component (VSC) of 27% will give the potential for good interior diffuse daylighting. A reduction in VSC to less than both 27% and 80% of its former value will be noticeable. 'Noticeable', however, is not to be equated with 'unacceptable'. And, as its introduction acknowledges, the Guide is just that - 'although it gives numerical guidelines, these should be interpreted flexibly because natural lighting is only one of many factors in site layout design'. That is true in urban areas especially, where VSCs very much lower than 27% do not seem to diminish the attraction of some popular residential areas."

6. Setting Appropriate Alternative Targets

6.1 The default nationwide BRE numerical criteria are based on 25 degree development angles, which are frequently inappropriate, and indeed unachievable, in relation to achieving required densities in areas of regeneration.

6.2 In its introduction, the BRE guide itself urges that the guidelines be interpreted flexibly:

[6] Refer to Core Documents CD5.13

"The advice given here is not mandatory……Although it gives numerical guidelines these should be interpreted flexibly……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….."

6.3 Again, this need for flexibility is also acknowledged in The Ministry of Housing Communities & Local Government National Planning Policy Framework at paragraph 123(c).

6.4 Given the modest massing that currently occupies the Appeal Site (it is low rise, and many areas close to the site boundary are currently vacant as they are being used as open-air carparking space), existing light levels currently reaching the neighbouring properties are extremely good, and any massing that sets to meet appropriate densities for an area designated for regeneration will result in some proportional reductions in daylight that are in excess of the guideline figures.

6.5 It is therefore important to consider the retained levels of daylight and whether they remain acceptable, giving consideration to the site context.

6.6 Appendix F of the BRE Guide provides advice on setting alternative targets for access to daylight and sunlight. In relation to the default targets it says; "*These values are purely advisory and different targets may be used … for example, in a mews in a historic city centre, a typical obstruction angle might be close to 40 degrees. This would correspond to a VSC of 18%, which could be used as a target*.'

6.7 In many areas, development angles of 40 degrees, or more, are common and a VSC of 18% has been a reasonable and accepted level of daylight in many desirable urban areas for well over a century.

6.8 In recent years, the need to make best use of available land means that the redevelopment of previously comparatively low rise, low density sites has required an increase in density, with corresponding increases in typical development angles and reductions in daylight. In many recent developments, therefore, angles of greater than 40 degrees are not uncommon.

6.9 In relation to the Appeal Site and the immediate surrounding area, Hazel House located opposite the site across Westfield Avenue (constructed circa 2014/2015) represents an established level of massing in the area, and it would be appropriate for buildings of a similar scale to be developed on the Appeal Site opposite.

6.10 Drawing P2654/07 within Appendix E shows the profile of Hazel House mirrored onto the site across the centre of Westfield Avenue. Measured from the centre of the ground floor windows, this would result in reciprocal development angles of 34 degrees. A development angle of 34 degrees equates to a VSC of 22%.

6.11 A VSC of 22% represents a good level of daylight, and I consider this to be an appropriate alternative target for the area.

6.12 Such targets apply to unfettered plain facades. The presence of balconies and large roof overhangs can dramatically reduce VSC values at windows neighbouring a site, and for this reason the VSC figures under such massing should not be used to judge the acceptability of proposed massing.

6.13 This is acknowledged at paragraph 2.2.11 of the BRE guide, where it is stated that:

"Existing windows with balconies above them typically receive less daylight. Because the balcony cuts out light from the top part of the sky, even a modest obstruction opposite may result in a large relative impact on the VSC, and on the area receiving direct skylight."

6.14 Where balconies or significant roof overhangs are presents, we have therefore undertaken 2 VSC analyses, one with the obstructions in place, and one with their effects removed from the calculations.

7. Assessment of Effects on Daylight Amenity

7.1 Drawings showing the scheme can be found at Appendix D. Drawings showing windows locations, the internal arrangements used in the analysis, and the associated NSL contours and daylight figures for Beech House, Hazel House and Elm View can be found at Appendices F, G and H respectively.

7.2 Daylight to Beech House

7.3 Located to the west of the development site, this property provides residential accommodation.

7.4 Floor plan information has been sourced from planning records for this property.[7]

7.5 There are 29 windows serving a total of 13 potentially affected bedrooms and 4 potentially affected combined living/kitchen/dining rooms (LKDs) within the block. These are contained within a total of 10 apartments.

Living/Kitchen/Dining Rooms

7.6 Considering the 4 LKDs, those at ground, first and second floor (rooms R2/120, R5/121 & R5/122) are single aspect, each served by 2 windows in the front elevation of the property. At 3rd floor, LKD R5/123 is served by 4 windows, with the 2 largest not directly facing the site.

7.7 Proportional reductions in VSC to the 4 windows serving R2/120 and R5/121 range from circa 31%-37%, and as such they would be noticeable to the occupants. However, each of these

[7] See Appendix B for details.

windows has its access to direct skylight restricted by balconies above, and even with these obstructions present the windows would all retain VSC values upwards of around 17% after development. Discounting the effects of the balconies, all windows serving these rooms would retain VSC values upwards of 24.9%. This is only marginally below the default nationwide target of 27% and is significantly above the 22% target I consider to be appropriate for the site. The balconies provide amenity space directly linked to the LKDs, the overall levels of daylight reaching the units as whole will remain very good after development.

7.8 The NSL analysis shows that there will be a negligible reduction (0.5%) to R2/120 and no reduction at all to R5/121.

7.9 Overall, I therefore consider the effects on these rooms to be acceptable.

7.10 This is also supported by the ADF analysis, which shows both rooms retaining ADF values in excess of the BRE recommended 2.0% for a kitchen, and therefore comfortably more than the 1.5% recommended for a living room, after development.

7.11 Considering room R5/122, reductions in VSC fully accord with default BRE guidance, and there will be no NSL reduction to the room. Any loss of daylight will therefore not be noticeable.

7.12 Considering room R5/123, while the 2 site facing windows (W8/123 & W9/123) would experience reductions that are in excess of guidance, these are the secondary windows serving the room. They also have their access to direct skylight significantly restricted by a large roof overhang above.

7.13 The 2 larger main windows serving the room will not be materially affect by the proposal, and overall, the room would continue to receive excellent daylight amenity after development.

7.14 There would be no reduction in NSL, and the retained ADF value will be 5.5%.

Bedrooms

7.15 The 13 bedrooms assessed are served by a total of 19 windows.

7.16 Of these 19 windows, reductions in VSC to 12 are in full accordance with BRE guidance.

7.17 Of the 7 windows that experience larger reductions (W1/120, W4/120, W5/120, W4/121, W3/123, W4/123 & W7/123), 3 (W3/123, W4/123 & W7/123), are located at 3rd floor, under the large roof overhang. The results of the analysis removing the effects of the overhang shows reductions in full accordance with BRE guidance. This demonstrates that it is the presence of the roof overhang, rather than the over development of the site that is the main factor in the noticeable loss of light to these windows.

7.18 Furthermore, the 2 rooms (R2/123 & R4/123) that these 3 windows serve are also each served by a further window that would not be noticeably affected by the development.

7.19 Overall effects on the rooms will therefore be minor. There will be no NSL reductions to either room, and the retained ADF values of 6.2% and 4.3% show that overall retained amenity would remain excellent after development.

7.20 Windows W1/120, W5/120 & W4/121 serve single aspect bedrooms (R1/120, R3/120 & R4/121). Proportional reductions in VSC to windows W1/120 and W4/121 are 24.9% and 22.0% respectively (i.e., only marginally more than the guideline 20%), and both these windows would retain VSC values in excess of 22%. Window W4/120 would experience a larger proportional reduction of 30.9%, but again the retained VSC of 25.6% represents a very good level of daylight. Reductions in NSL to the rooms these windows serve are small and in

full accordance with default BRE guidance. Retained ADF values are all in excess of 2.5%, again demonstrating that overall retained amenity would remain very good.

7.21 Window W5/120, which would experience a proportional reduction in VSC of 32.8%, serves a dual aspect bedroom (R4/120). The secondary window (W6/120) will not experience a noticeable reduction in VSC, and again the NSL reduction to the room fully accords with BRE guidance. The retained VSC value to W5/120 would be 25.1% (again, a very good level of daylight), and the ADF analysis shows the room retaining a value of 2.9%.

Summary

7.22 13 windows serving the property will experience reduction in daylight that are in excess of default BRE guidance and therefore likely to be noticeable. This would be expected in relation to any scheme of an appropriate density for the site[8]. Overall retained levels of daylight to the property would remain good after development. Reductions in NSL are small and in full accordance with BRE guidance and retained VSC values reaching the property (i.e. those discounting the effects of balconies and roof overhangs) are all upwards of 22%. Furthermore, the ADF analysis shows all rooms continuing to meet their respective targets after development.

7.23 I therefore consider the effects on the property to be acceptable.

7.24 **Daylight to Hazel House**

7.25 Located to the west of the development site this property provides residential accommodation.

7.26 Floor plan information has been sourced from planning records for this property.[9]

[8] See paragraphs 6.5-6.11
[9] See Appendix B for details.

7.27 There are 61 windows serving a total of 18 potentially affected bedrooms and 15 potentially affected combined living/kitchen/dining rooms within the block. These are contained within a total of 15 apartments.

Living/Kitchen/Dining Rooms

7.28 6 of the 15 LKDs (R4/141 & R7/141 at first floor, R4/142 & R7/142 at second floor, and R4/143 & R7/143 at third floor) are single aspect, each served by 2 windows in the front elevation of the property. The remaining LKDs are all dual aspect.

7.29 Considering the windows serving the 6 single aspect LKDs, reductions in VSC to those at 3rd floor fully accord with BRE guidance. Similarly, reductions to both windows serving R7/142, and one of the windows (W8/142) serving R4/142 will also accord with guidance. The second window (W9/142) serving room R4/142 will retain a VSC of 26.3%, i.e., only marginally less than the guideline 27%.

7.30 The windows serving first floor rooms R4/141 & R7/141 will experience proportional reductions in VSC of between 30% and 35%. While these reductions might be noticeable to the occupants, retained VSC values after development would remain good (between 23.9% & 26.1%) and comfortably more than the 22% I consider acceptable in relation to this site.

7.31 Each of these 6 rooms is more than 5.6m deep, and therefore it is not unusual for there to be NSL reductions in excess of guidance. As stated at paragraph 2.2.10 of the BRE guidelines:

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

7.32 Overall, I consider the effects on these rooms to be acceptable. This is also supported by the ADF analysis, which shows all 6 rooms retaining ADF values in excess of the BRE

recommended 2.0% for a kitchen, and therefore comfortably more than the 1.5% recommended for a living room, after development.

7.33 The remaining 9 LKDs are all dual aspect, meaning that each is served by at least one window that does not directly face the site and will therefore not experience a noticeable reduction in daylight.

7.34 The site facing windows serving these rooms that experience reductions in VSC that are beyond BRE guidance all have their access to direct skylight at restricted by balconies or large roof overhangs. Discounting the effects of these obstructions, the windows would all retain VSC values of at least 22.5%.

7.35 Reductions in NSL to all 9 of the rooms are minimal (the maximum proportional reduction is 3.1%, and BRE guidance allows for reductions of up to 20%.).

7.36 The ADF figures show all the rooms retaining values is excess of 3.5%, comfortably more than both the BRE targets of 1.5% for a living room and 2.0% for a kitchen.

Bedrooms

7.37 The 18 bedrooms assessed are served by a total of 22 windows.

7.38 Of these 22 windows, reductions in VSC to 10 are in full accordance with BRE guidance.

7.39 Of the 12 windows that experience larger reductions, 4 (W5/124, W7/124, W8/124 & W9/124), are located at 4th floor, under the large roof overhang[10]. The analysis removing the effects of the overhang shows reductions in full accordance with BRE guidance. This demonstrates that

[10] See Photograph shown on drawing P2654/P/01 contained within Appendix G

it is the presence of the roof overhang, rather than the over development of the site that is the main factor in the noticeable loss of light to these windows.

7.40 I consider the overall effects on the 4 rooms these windows serve to be acceptable. NSL reductions are small and very comfortably within guidance (the largest proportional reduction to any of the 4 rooms is 5.3%), and the ADF figures show retained values to each of the rooms of over double the recommended target for a bedroom of 1.0%.

7.41 The remaining 8 windows serve 8 single aspect site facing rooms. Retained VSC values to 4 of these (W7/141, W11/141, W7/142 & W11/142) are all in excess of 23%. This represents a good level of daylight, and I consider this more than acceptable for the location.

7.42 Window W6/140 retains a slightly lower VSC of 21.2% due to the balconies serving the adjacent column of LKDs. Windows W10/141, W10/142 & W10/143 retain slightly lower values again due to their set back location adjacent to the return elevation.

7.43 Of the 8 rooms these windows serve, 7 will experience reductions in NSL that are in excess of BRE guidance. However, all but 2 of these rooms (R5/141 & R5/142) have an overall depth of over 5 metres. Again, As stated at paragraph 2.2.10 of the BRE guidelines:

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

7.44 Rooms R5/141 & R5/142 both have an overall depth of 4.76m.

7.45 Considering the ADF figures for the 8 rooms, these show all but 1 (R3/140) retaining values in excess of double the BRE recommended 1.0% for a bedroom. The retained figure for R3/140 is 1.6%. Again, this shows that overall retained amenity is more than acceptable.

Summary

7.46 While 27 windows serving the property, and 15 rooms within the property, will experience reductions in daylight (VSC and NSL respectively) that are in excess of default BRE guidance, derogations from guidance would be expected in relation to any scheme of an appropriate density for the site[11]. Overall retained levels of daylight to the property would remain more than sufficient after development.

7.47 I therefore consider the effects on the property to be acceptable.

7.48 **Daylight to Elm View**

7.49 Located adjacent to the northern boundary of the development site this property provides residential accommodation.

7.50 Of the windows serving the main habitable rooms with the property that could potentially be affected by the redevelopment of the site, reductions to the majority fully accord with BRE guidance.

7.51 At ground floor, each room is served by at least 1 window that will not experience a noticeable reduction in daylight, mitigating the reductions to those that do.

7.52 Overall retained levels of daylight reaching the property will remain good, with all the windows retaining VSC values of more than 22% after development.

7.53 The NSL analysis shows small reductions that fully accord with guidance throughout the property.

[11] See paragraphs 6.5-6.11

7.54 The ADF analysis shows all the ground floor rooms retaining values in excess of 2.0% (i.e., more than the BRE targets for both living rooms and kitchens). Futhermore, overall proportional reductions in ADF to the ground floor rooms are less than 20%, i.e., they would not be noticeable to the occupants.

7.55 All the first-floor rooms retain ADF values of more than 2.0%, and therefore at least double the BRE target of 1.0% for a bedroom.

7.56 Overall, I therefore consider the effects on this property to be acceptable. It will continue to receive more than sufficient levels of daylight after development.

8. Conclusion

8.1 In conclusion, I have carefully reviewed the impact in terms of daylight of the scheme on the neighbouring properties. Although there are effects, those effects must be considered against the background of Government policy. Because available land is finite, a balance must be struck between the importance of light and the importance of the construction of homes and offices, and the provision of jobs, schools and other essentials. Retained levels of daylight to the surrounding properties will remain more than satisfactory after development. The effects are in my view acceptable and will be commensurate with similar sites and localities. Our conclusion appears consistent with that drawn by EB7 in the initial planning submission, and also with that of the case officer's report to committee[12].

[12] Woking Borough Council Planning Application ref. PLAN/2019/1176, Planning Committee Report paragraphs 449 & 598