

Appendix 2: Daylight and Sunlight Policies

City of London

Draft City Plan 2036

Main Policy: Policy D8 (Daylight and sunlight)

Policy D8: Daylight and sunlight

1. Development proposals will be required to demonstrate that the **daylight and sunlight** available to nearby dwellings and open spaces is not reduced noticeably to unacceptable levels, taking account of the Building Research Establishment's guidelines.
2. The design of new developments should allow for the lighting needs of intended occupiers and provide acceptable levels of **daylight and sunlight** consistent with a city centre context.
3. The design of development should incorporate measures to mitigate adverse solar glare effects on surrounding buildings and public realm.

Reason for the policy

6.1.57. *The City is an urban centre with a very high density of buildings. The impact of this density on surrounding areas can be to reduce levels of **daylight and sunlight** in the surrounding area below that which would normally be expected. The City Corporation seeks to provide the best outcome in terms of **sunlight and daylight**, both for the development itself and the buildings in the vicinity, requiring design strategies that maximise the natural light potential.*

6.1.58. *The amount of **daylight and sunlight** received has an important effect on the amenity of dwellings, the appearance and enjoyment of the open spaces and streets of the City, and the energy efficiency of all buildings. Access to appropriate levels of **daylight and sunlight** is important for the mental health of workers and residents.*

How the policy works

6.1.59. *The Building Research Establishment (BRE) has issued guidelines in 'Site Layout Planning for **Daylight and Sunlight**' that set out a methodology for assessing changes in **daylight and sunlight** arising from new development. The City Corporation will apply these methods, consistent with BRE and NPPF guidance that ideal **daylight and sunlight** conditions may not be practicable in densely developed city-centre locations. Developers will be required to submit **daylight and sunlight** assessments in support of their proposals. The City Corporation may seek independent verification of these assessments at the developer's expense.*

6.1.60. *When considering proposed changes to existing lighting levels, the City Corporation will take account of the cumulative effect of development proposals, and existing levels of light if they are low. Where appropriate, the City Corporation will take into account unusual existing circumstances, such as development on an open or low-rise site and the presence of balconies or other 101 external features, which limit the **daylight and sunlight** that a building can receive.*

6.1.61. *Planning considerations concerning **daylight and sunlight** operate independently of any common law rights and any light and air agreements which may exist. If a development is considered acceptable in planning terms and has planning permission, but it is not proceeding due to rights to light issues, the City Corporation may consider acquiring interests in land or appropriating land for planning purposes to enable development to proceed.*

Other references:

1) Policy S12 (Tall Buildings)

Strategic Policy S12: Tall Buildings

3. Where tall buildings are acceptable in principle, their design must ensure safe and comfortable levels of wind, **daylight and sunlight**, solar glare and solar convergence within nearby buildings and the public realm within the vicinity of the building. Tall buildings should not interfere with telecommunications and provide appropriate mitigation where this is not feasible. Consideration should be given to how the design of tall buildings can assist with the dispersal of air pollutants.

2) Policy H4 (Housing quality standards) paragraph 4.4.40 - See Policy CS21 Housing

*4.3.40. Amenity space for residents could include gardens, roof top gardens/terraces, private balconies and the provision of new sports and recreational facilities. Play space should also be included in line with the requirements in Policy D8. **Daylight and sunlight** to dwellings is addressed in the Design section of the Plan.*

3) Policy S8 (Design)

Strategic Policy S8: Design

The City Corporation will promote innovative, sustainable and inclusive high-quality buildings, streets and spaces, seeking design solutions that make effective use of limited land and contribute towards a zero emission City, through development which:

Experience

5. Optimises micro-climatic conditions, addressing solar glare, **daylight and sunlight** and uncomfortable wind conditions and delivering improvements in air quality, open space and views;

4) Policy S21 (City Cluster) paragraph 7.6.6

*7.6.6. The intensification of tall buildings will have cumulative environmental and transport impacts which need to be carefully managed. Individual proposals for new tall buildings will need to take account of these cumulative impacts, especially the need to maintain and enhance the provision of public open space around the building, to ensure safe and comfortable levels of wind, **daylight and sunlight**, solar glare and solar convergence, and to implement efficient servicing and deliveries arrangements.*

Mayor of London/Greater London Authority (GLA)

*Draft London Plan (Consolidated changes version July 2019)

Policy D4 (Housing quality and standards)

Part F and paragraphs 3.4.5A 3.4.12

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

*3.4.5A: A variety of approaches to housing typologies and layout of buildings should be explored to make the best use of land and create high quality, comfortable and attractive homes. For example, increasing ceiling heights and having bay windows can optimise **daylight and sunlight** and allow buildings to be closer together than can otherwise be achieved.*

*3.4.12: Other components of housing design are also important to improving the attractiveness of new homes as well as the Mayor's wider objectives to improve the quality of Londoners' environment. The Mayor intends to produce a single guidance document which clearly sets out the standards which need to be met in order to implement Policy D4 Housing quality and standards for all housing tenures, as well as wider qualitative aspects of housing developments. **This will include guidance on daylight and sunlight standards.** This will build on the guidance set out in the 2016 Housing SPG and the previous London Housing Design Guide.*

Policy H2A (Small housing developments) paragraph 4.2A.6

*4.2A.6: Small housing developments are envisaged to be within close proximity to existing homes. These should be carefully and creatively designed to avoid an unacceptable level of harm to the amenity of surrounding properties in relation to privacy, for example through the placement and design of windows and the use of landscaping. Environmental and architectural innovation should be supported and schemes should achieve good design and ensure that existing and proposed homes benefit from satisfactory levels of **daylight and sunlight**.*

**Please note the words 'daylight' and 'sunlight' are cited in other places of the draft London Plan but not referred to in above policies (see below for further information)*

Wording in green – post sessions changes

Other references:

'Daylight'

Policy D4 (Housing quality and standards) Part E, paragraphs 3.4.3, 3.4.4, 3.4.5 and Table 3.2

E: Housing 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 D1B Part B than a dual aspect dwelling, and it can be demonstrated that it will have adequate passive ventilation, **daylight** and privacy, and avoid overheating.

*3.4.3: To address the impacts of the urban heat island effect and the fact that the majority of housing developments in London are made up of flats, a minimum ceiling height of 2.5m for at least 75 per cent of the gross internal area is required so that new housing is of adequate quality, especially in terms of **daylight** penetration, ventilation and cooling, and sense of space. The height of ceilings, doorways and other thresholds should support the creation of an inclusive environment and therefore be sufficiently high to not cause an obstruction. To allow for some essential equipment in the ceilings of kitchens and bathrooms up to 25 per cent of the gross internal area of the dwelling can be lower than 2.5 m. However, any reduction in ceiling height below 2.5 m should be the minimum necessary for this equipment, and not cause an obstruction.*

*3.4.4: Dual aspect dwellings with opening windows on at least two sides have many inherent benefits. These include better **daylight**, a greater chance of direct **sunlight** for longer periods, natural cross-ventilation, a greater capacity to address overheating, mitigating pollution, a choice of views, access to a quiet side of the building, greater flexibility in the use of rooms, and more potential for future adaptability by altering the use of rooms.*

*3.4.5: Single aspect dwellings are more difficult to ventilate naturally and are more likely to overheat, and should normally be avoided. Single aspect dwellings that are north facing, contain three or more bedrooms or are exposed to noise levels above which significant adverse effects on health and quality of life occur should not be permitted. The design of single aspect dwellings must demonstrate that all habitable rooms and the kitchen are provided with adequate passive ventilation, privacy and **daylight**, and that the orientation enhances amenity, including views. It must also demonstrate how they will avoid overheating without reliance on energy intensive mechanical cooling systems.*

*Table 3.2 point iii: **The site layout, orientation and design of individual dwellings and where applicable common spaces should:***

*- provide privacy and adequate **daylight** for residents*

Wording in red – minor suggested change text

'Sunlight'

Policy D7 (Public realm) Part I, paragraphs 3.5.5 (Policy D5), 3.1B.8 (Policy D1B) and 3.8.5 (Policy D8)

I: ensure that appropriate shade, shelter, seating and where possible areas of direct sunlight are provided, with other microclimatic considerations, including temperature and wind, taken into account in order to encourage people to spend time in a place.

*3.5.5: The middle of a tall building has an important effect on how much sky is visible from surrounding streets and buildings, as well as on wind flow, privacy and the amount of **sunlight** and shadowing there is in the public realm and by surrounding properties.*

*3.1B.8: Buildings should be of high quality and enhance, activate and appropriately frame the public realm. Their massing, scale and layout should help make public spaces coherent and should complement the existing streetscape and surrounding area. Particular attention should be paid to the design of the parts of a building or public realm that people most frequently see or interact with in terms of its legibility, use, detailing, materials and location of entrances. Creating a comfortable pedestrian environment with regard to levels of **sunlight**, shade, wind, and shelter from precipitation is important.*

*3.8.5: The middle of a tall building has an important effect on how much sky is visible from surrounding streets and buildings, as well as on wind flow, privacy and the amount of **sunlight** and shadowing there is in the public realm and by surrounding properties.*

Wording in blue – Further suggested change text (i.e. matter statements or prior to the session)

'Daylight' and 'Sunlight'

Policy D8C3a (Tall Buildings) and see above 3.4.4

Development proposals should address the following impacts:

*Environmental impact - wind, **daylight**, **sunlight** penetration and temperature conditions around the building(s) and neighbourhood must be carefully considered and not compromise comfort and the enjoyment of open spaces, including water spaces, around the building*