

22.01.2026

Mr Mark Naughton
 Planning & Property Partners Pty Ltd
 13/1 Collins Street
 Melbourne VIC 3000

Email: naughton@pppartners.com.au

Subject:

50-52 Breese Street & 655-661 Sydney Road, Brunswick – Internal Daylight Analysis

Dear Mark

As instructed, Ark Resources has undertaken computer simulation of daylight levels within habitable rooms of the proposed townhouse development at 50-52 Breese Street & 655-661 Sydney Road, Brunswick in response to the *Request for Further Information* (RFI) issued by the Department of Transport and Planning on 23 December 2025.

The results of the initial computer simulation using the BESS daylight factor method based on the town planning submission drawings revealed daylight constraints within:

- the majority of ground floor living rooms of the three-level townhouse types; and,
- Level 1 areas of the two-level townhouses (Units 5, 6, 16, 27 & 38)

In order to optimise the daylight outcomes within these rooms I recommend the following minor amendments to the circulated drawings:

- Ground floor entry doors with transoms glazing on the south and east facades to all three-level townhouses in lieu of solid timber doors currently specified;
- Addition of a skylight to living areas of all two-level townhouses.

We have undertaken further daylight analysis assuming these changes are implemented and the results confirm that internal daylight levels within the living rooms of all townhouses are significantly improved and will receive adequate daylight.

I have discussed these proposed amendments with the Applicant and I understand that they have committed to implementing these recommendations and have incorporated the changes into the revised Revision B drawings issued on 21 January 2026.

Notwithstanding my recommendations above, I note that the RFI refers to the daylight requirements of the BESS sustainability rating tool however these are only applicable to apartment developments. Indeed, the BESS tool does not stipulate any daylight methodology, metric, standard or requirement for townhouse (NCC Class 1) dwellings such as those proposed on the subject site.

I trust this provides sufficient information in relation to internal daylight levels within the proposed development, however, please don't hesitate to contact me if you require any further information.

Yours sincerely



Jan Talacko
 Director

**ADVERTISED
 PLAN**