

ABBEY WHARF 57 KINGS ROAD READING RG4 8DS
ADEQUATE NATURAL LIGHT

INTRODUCTION

This Report has been commissioned to accompany the Prior Approval Application made under Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) - Schedule 2, Part 3, Class MA to demonstrate the scheme provides adequate natural light as required under MA.2.(f). The scheme proposals comprise the conversion of the ground to fourth floors of the existing building to provide 78nr self-contained as generally shown on the attached drawings.



PHOTO: DEVELOPMENT SITE

PROFESSIONAL QUALIFICATIONS

I am a Chartered Building Surveyor working predominately in the field of rights of light including daylight and sunlight assessments. I have extensive and highly specialised knowledge, in these areas having worked in the past for both Anstey Horne & Co. for five years and Schatunowski Brooks (formerly known as Michael Brooks Associates as it was when I joined, then known as GVA Schatunowski Brooks and until recently part of Avison Young) for three years, as well as Delva Patman Associates - now known as Delva Patman Redler LLP - for four years prior to joining in Partnership Dixon Payne in 2001. All are acknowledged Experts in these fields; I now act under my own banner.

I regularly provide Expert Witness advice in respect of Planning Applications in respect of daylight and sunlight at Planning Inquiries acting for both Appellants and Planning Authorities. I was consulted by the *Building Research Establishment* prior to the revision of their guidelines in 2011 and was part of the further consultation following the publication of *BS EN 17037:2018* which resulted in the publication of BR209 2022.

PLANNING CONSIDERATIONS

MA.2.—(1) Development under Class MA is permitted subject to the following conditions.

- (2) Before beginning development under Class MA, the developer must apply to the local planning authority for a determination as to whether the prior approval of the authority will be required as to—
 - (a) transport impacts of the development, particularly to ensure safe site access;
 - (b) contamination risks in relation to the building;
 - (c) flooding risks in relation to the building;
 - (d) impacts of noise from commercial premises on the intended occupiers of the development;
 - (e) where—
 - (i) the building is located in a conservation area, and
 - (ii) the development involves a change of use of the whole or part of the ground floor, the impact of that change of use on the character or sustainability of the conservation area;
 - (f) the provision of adequate natural light in all habitable rooms of the dwellinghouses;
 - (g) the impact on intended occupiers of the development of the introduction of residential use in an area the authority considers to be important for general or heavy industry, waste management, storage and distribution, or a mix of such uses; ..
 - (h) where the development involves the loss of services provided by—
 - (i) a registered nursery, or
 - (ii) a health centre maintained under section 2 or 3 of the National Health Service Act 2006, the impact on the local provision of the type of services lost; and
 - (i) where the development meets the fire risk condition, the fire safety impacts on the intended occupants of the building]
- (3) An application for prior approval for development under Class MA may not be made before 1 August 2021.
- (4) The provisions of paragraph W (prior approval) of this Part apply in relation to an application under this paragraph as if—
 - (a) for paragraph (e) of sub-paragraph (2) there were substituted—

“(e)where—

 - (i) sub-paragraph (6) requires the Environment Agency to be consulted, a site-specific flood risk assessment;
 - (ii) sub-paragraph (6A) requires the Health and Safety Executive to be consulted, a statement about the fire safety design principles, concepts and standards that have been applied to the development,”;
 - (b) in the introductory words in sub-paragraph (5), for “and highways impacts of the development” there were substituted “impacts of the development, particularly to ensure safe site access”;
 - (c) after sub-paragraph (6) there were inserted—

“(6A) Where the application relates to prior approval as to fire safety impacts, on receipt of the application, the local planning authority must consult the Health and Safety Executive.”;

(d) in sub-paragraph (7) for “(5) and (6)” there were substituted “(5), (6) and (6A)”;

- (5) Development must be completed within a period of 3 years starting with the prior approval date.
- (6) Any building permitted to be used as a dwellinghouse by virtue of Class MA is to remain in use as a dwellinghouse within the meaning of Class C3 of Schedule 1 to the Use Classes Order and for no other purpose, except to the extent that the other purpose is ancillary to the use as a dwellinghouse.

ADEQUATE NATURAL LIGHT

There is currently no universally accepted definition for adequate natural light. However, since the publication of the information paper titled "Site Layout planning for daylight and sunlight: A guide to good practice" by the Building Research Establishment in 1991, the assessment of daylight and sunlight has been generally carried out according to the criteria outlined in this publication. These criteria are widely recognized as the accepted basis for such assessments and are therefore adopted by most Planning Authorities. This publication was superseded by the Second Edition 2011.

Following the publication of BS EN 17037:2018, the Second Edition 2011 was further updated and BR209 (2022) was published and is now the current guidance.

The BR209 (2022) does give numerical guidelines, but recommends that these should be interpreted flexibly. Paragraph 1.6 of the BR209 (2022) states in entirety *The guide is intended for building designers and their clients, consultants, and planning officials. 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 (see Section 5). In special circumstances the developer or planning authority may wish to use different target values. For example, in a 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. Alternatively, where natural light is of special importance, less obstruction and hence more sunlight and daylight may be deemed necessary. The calculation methods in Appendices A and B are entirely flexible in this respect. Appendix F gives advice on how to develop a consistent set of target values for skylight under such circumstances.*

In respect of adequate daylight of the proposals, this has been considered using the illuminance method of analysis – SDA – as detailed in Appendix C of BR209 (2022). This method involves using climatic data for the location of the site (via the use of an appropriate, typical or average year, weather file within the software) to calculate the illuminance from daylight at each point on an assessment grid on the reference plane at an at least hourly interval for a typical year. This provides a better overview of the internal illuminance of a room because it considers differing weather/cloud cover throughout the year. The UK National Annex gives illuminance recommendations of 100 lux in bedrooms, 150 lux in living rooms and 200 lux in kitchens. These are the median illuminances, to be exceeded over at least 50% of the assessment points in the room for at least half of the daylight hours.

The analysis has been undertaken with reflectance values of 0.80 for walls/ceilings and 0.40 for floors.

RESULTS

As stated above, Appendix C of BR209 (2022) recommends illuminance levels of 100 lux in bedrooms, 150 lux in living rooms and 200 lux in kitchens. Internal galley-style kitchens have been utilised, but as provided within BR209 (2022), these open onto a well-lit room.

Adequate Natural Light

In accordance with paragraph C31 of the Appendix C of BR209 (2022), as the first to fourth floor proposals are generally identical, the results for the ground and first floor proposals only are shown below.

C31 It may not be necessary to analyse every room in a proposed development. For example, if a building has the same room and window layouts on each floor, and rooms on a lower floor meet the recommendations, then the corresponding rooms on upper floors would be expected to meet the recommendations too.

Results

Floor Ref	Room Ref	Room Use	Room Area m2	Effective Area	Median Lux	Area Meeting Req Lux	% of Area Meeting Req Lux	Req Lux	Req % of Effective Area	Meets Criteria
Flat 1										
Ground	R1	LKD	25.18	18.14	261	12.04	66%	200	50%	YES
	R2	Bedroom	17.57	12.09	326	12.09	100%	100	50%	YES
Flat 2										
Ground	R1	Studio	29.48	22.70	389	22.70	100%	200	50%	YES
Flat 3										
Ground	R1	LKD	20.40	14.75	315	12.81	87%	200	50%	YES
	R2	Bedroom	13.91	9.28	407	9.28	100%	100	50%	YES
Flat 4										
Ground	R1	Living Room	28.10	20.57	305	12.65	62%	150	50%	YES

Flat 5										
Ground	R1	LKD	21.85	15.43	619	15.43	100%	200	50%	YES
	R2	Bedroom	15.50	10.43	515	10.43	100%	100	50%	YES
Flat 6										
Ground	R1	LKD	22.28	16.99	1270	16.99	100%	200	50%	YES
	R2	Bedroom	14.09	9.75	605	9.75	100%	100	50%	YES
	R3	Bedroom	10.20	6.43	403	6.43	100%	100	50%	YES
Flat 7										
Ground	R1	LKD	33.46	25.50	386	17.61	69%	200	50%	YES
	R2	Bedroom	13.89	9.37	273	9.37	100%	100	50%	YES
Flat 8										
Ground	R1	Studio	31.47	24.73	206	12.87	52%	200	50%	YES
Flat 9										
Ground	R1	LKD	25.63	18.75	240	10.62	57%	200	50%	YES
	R2	Bedroom	16.86	11.76	326	11.76	100%	100	50%	YES
Flat 10										
Ground	R1	LKD	20.97	15.39	476	15.39	100%	200	50%	YES
	R2	Bedroom	13.71	9.39	415	9.39	100%	100	50%	YES
Flat 11										
Ground	R1	Studio	35.92	26.24	235	15.24	58%	200	50%	YES

Flat 12										
Ground	R1	Living Room	27.29	20.74	189	13.54	65%	150	50%	YES
Flat 13										
Ground	R1	Living Room	25.79	19.11	184	11.45	60%	150	50%	YES
Flat 14										
Ground	R1	Studio	30.57	23.10	421	23.02	100%	200	50%	YES
Flat 15										
Ground	R1	LKD	19.01	13.56	875	13.56	100%	200	50%	YES
	R2	Bedroom	11.13	7.42	456	7.42	100%	100	50%	YES
Flat 16										
Ground	R1	LKD	23.03	16.43	399	13.61	83%	200	50%	YES
	R2	Bedroom	16.21	11.13	140	8.44	76%	100	50%	YES
Flat 17										
Ground	R1	Living Room	22.83	16.37	193	9.99	61%	150	50%	YES
	R2	Bedroom	10.94	7.10	210	7.10	100%	100	50%	YES
	R3	Bedroom	13.77	9.19	246	9.19	100%	100	50%	YES
Flat 18										
Ground	R1	LKD	20.63	14.88	1032	14.88	100%	200	50%	YES
	R2	Bedroom	13.34	9.23	379	9.23	100%	100	50%	YES
Flat 19										
First	R1	Living Room	17.29	11.93	949	11.93	100%	150	50%	YES
	R2	Bedroom	12.47	8.39	596	8.39	100%	100	50%	YES

Flat 20										
First	R1	Living Room	25.08	18.08	523	18.08	100%	150	50%	YES
Flat 21										
First	R1	Studio	34.35	26.55	555	26.55	100%	200	50%	YES
Flat 22										
First	R1	LKD	24.98	18.55	357	18.17	98%	200	50%	YES
	R2	Bedroom	18.43	13.28	174	10.82	81%	100	50%	YES
Flat 23										
First	R1	LKD	24.42	17.70	622	17.61	99%	200	50%	YES
	R2	Bedroom	14.73	9.84	671	9.84	100%	100	50%	YES
Flat 24										
First	R1	LKD	24.13	18.62	1527	18.62	100%	200	50%	YES
	R2	Bedroom	16.57	11.60	775	11.60	100%	100	50%	YES
	R3	Bedroom	10.47	6.61	308	6.61	100%	100	50%	YES
Flat 25										
First	R1	LKD	33.37	25.43	441	18.20	72%	200	50%	YES
Flat 26										
First	R1	Living Room	33.17	25.79	288	20.41	79%	150	50%	YES
Flat 27										
First	R1	LKD	26.00	19.12	255	11.05	58%	200	50%	YES
	R2	Bedroom	16.41	11.66	442	11.66	100%	100	50%	YES

Flat 28										
First	R1	LKD	25.28	19.23	616	19.23	100%	200	50%	YES
	R2	Bedroom	16.54	11.39	578	11.39	100%	100	50%	YES
Flat 29										
First	R1	LKD	21.92	16.09	333	14.17	88%	200	50%	YES
	R2	Bedroom	18.52	12.74	217	11.12	87%	100	50%	YES
Flat 30										
First	R1	LKD	25.35	19.14	292	15.11	79%	200	50%	YES
	R2	Bedroom	13.50	9.30	268	9.30	100%	100	50%	YES
Flat 31										
First	R1	Living Room	15.02	10.56	290	10.56	100%	150	50%	YES
	R2	Bedroom	11.86	7.99	294	7.99	100%	100	50%	YES
Flat 32										
First	R1	LKD	20.97	15.39	584	15.39	100%	200	50%	YES
	R2	Bedroom	13.22	8.82	241	8.82	100%	100	50%	YES
Flat 33										
First	R1	LKD	22.50	16.52	1078	16.52	100%	200	50%	YES
	R2	Bedroom	13.07	8.50	769	8.50	100%	100	50%	YES
Flat 34										
First	R1	LKD	22.90	16.27	278	11.82	73%	200	50%	YES
	R2	Bedroom	17.04	11.24	137	7.95	71%	100	50%	YES

Flat 35										
First	R1	Living Room	20.98	15.22	290	13.23	87%	150	50%	YES
	R2	Bedroom	15.84	10.95	266	10.95	100%	100	50%	YES
	R3	Bedroom	11.36	7.16	295	7.16	100%	100	50%	YES
Flat 36										
First	R1	LKD	26.92	20.70	1065	20.70	100%	200	50%	YES
	R2	Bedroom	15.40	10.78	599	10.78	100%	100	50%	YES

In summary, the analysis results show that adequate levels of daylight amenity would be received within the proposed habitable rooms, with all living areas and bedrooms receiving good levels of daylight amenity.

CONCLUSION

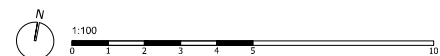
In order for Prior Approval under the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) - Schedule 2, Part 3, Class MA, MA.2.(f). requires the provision of adequate daylight in all habitable rooms and the analysis undertaken in accordance with Appendix C of BR209 (2022) demonstrates that the proposals accord with that guidance; in my Expert opinion, the provision for adequate daylight has been met.

April 28, 2025

R W STAIG BSC MRICS

E-mail : richardstaig@btinternet.com

Mobile : 07710 066235



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revisions:

client:
HMOUNTLEY

project:
Abbey Wharf
Reading

description:
Proposed ground floor

JDW
architects ltd

head office:
the old stone masons, 10 st johns st,
abergavenny, monmouthshire, np7 5rt
tel: 01873 851125 fax: 01873 851127

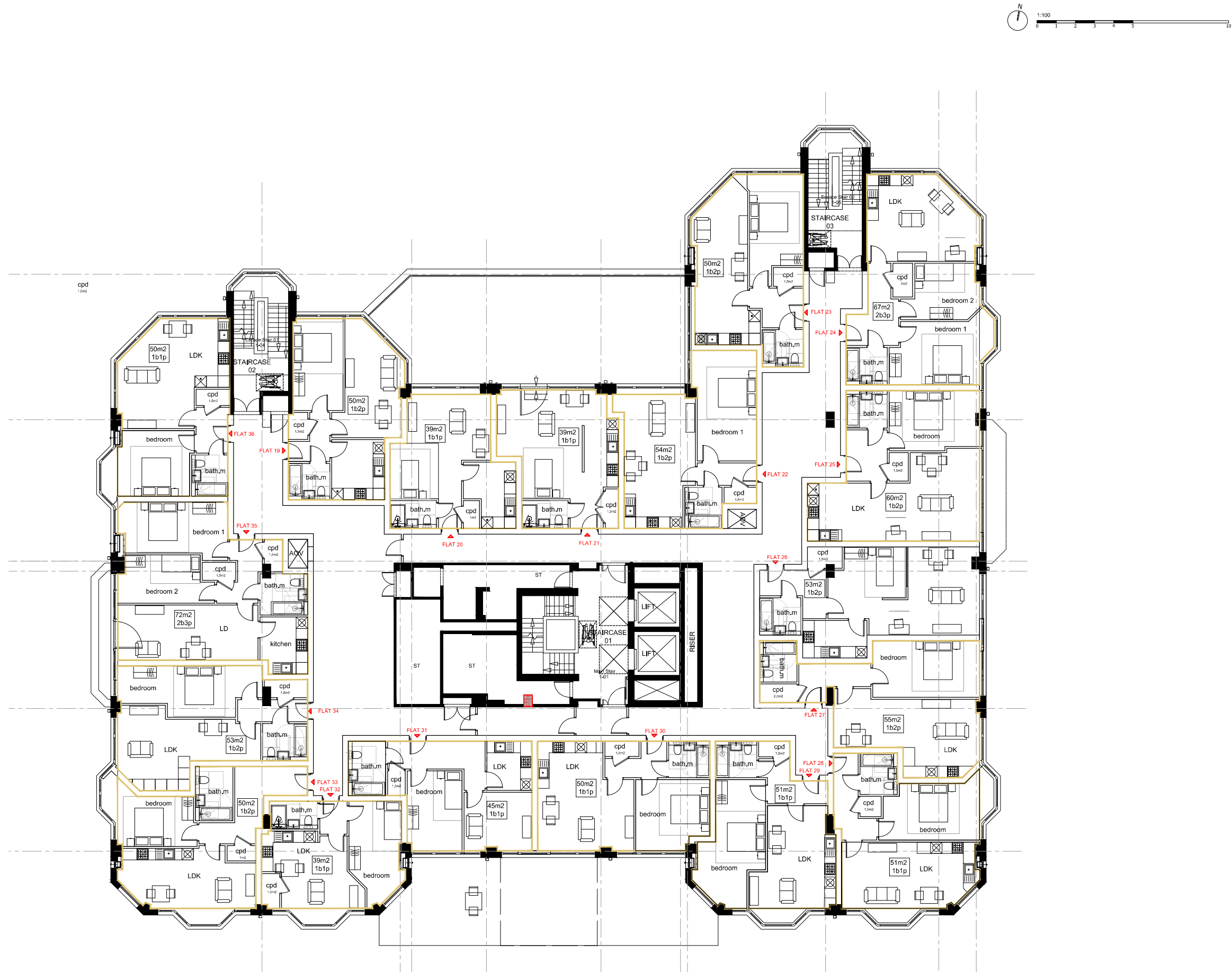
newport:
first floor, 5 gold tops,
newport, south wales, np20 4pg
tel: 01633 245020

e: mail: info@jdwarehitects.co.uk
w: www.jdwarchitects.co.uk

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PROPOSED FIRST FLOOR

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revisions:

client:
HMountley

project:
Abbey Wharf
Reading

description:
Proposed first floor



head office:
the old stone masons, 10 st Johns St,
Abergavenny, Monmouthshire, NP7 5RT
tel: 01873 851125 fax: 01873 851127

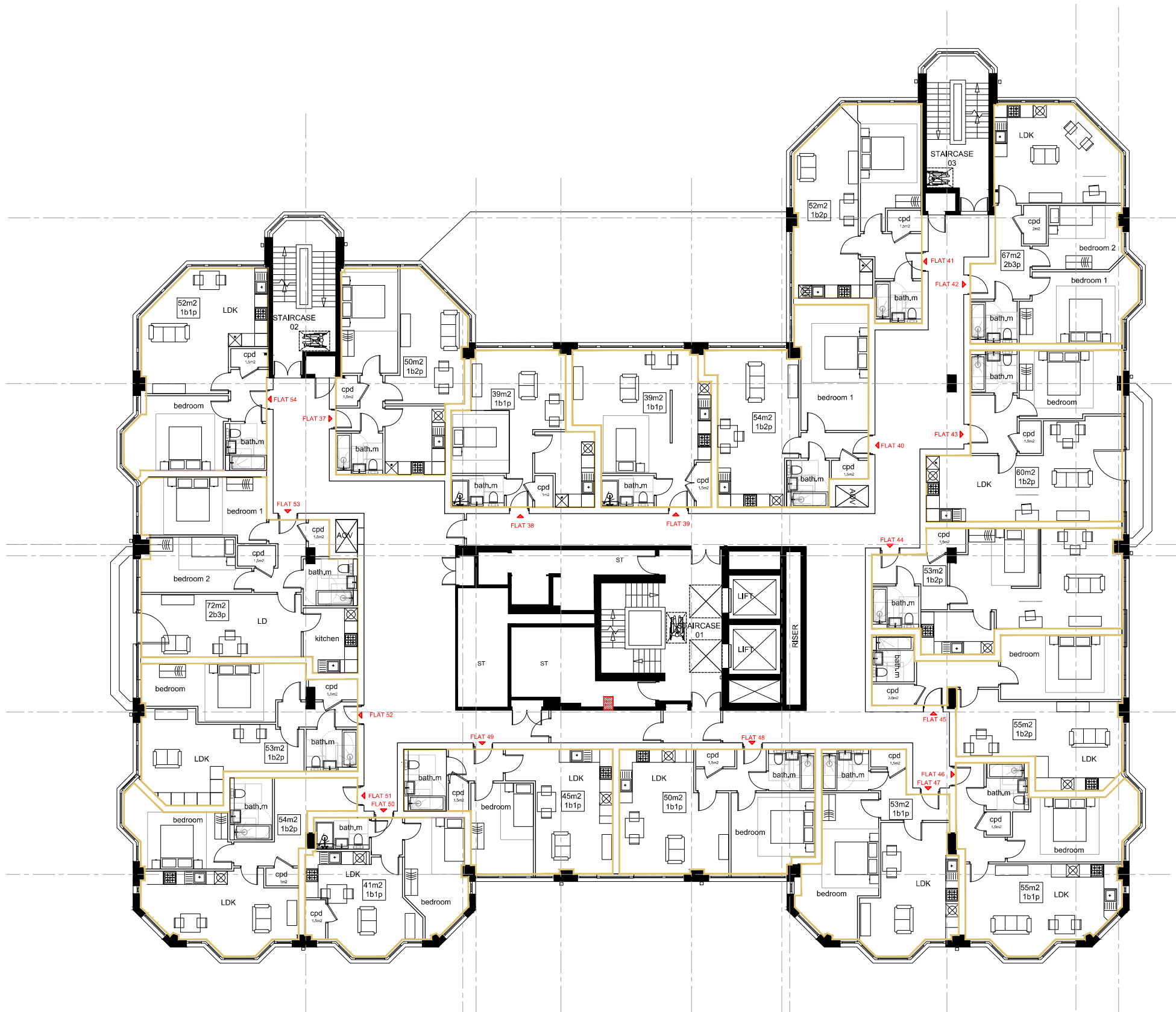
newport:
first floor, 5 gold tops,
Newport, South Wales, NP20 4PP
tel: 01633 245020

e: mail: info@jdwarehitects.co.uk
w: www.jdwarchitects.co.uk

drawn: scale: @A1
JDW varies
date: sheet of:

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PROPOSED SECOND FLOOR PLAN

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revisions:

client:
HMOUNTLEY

project:
Abbey Wharf
Reading

description:
Proposed Second Floor

JDW architects ltd

head office:
the old stone masons, 10 st Johns St.
Abergavenny, Monmouthshire, NP7 5RT
tel: 01873 851125 fax: 01873 851127

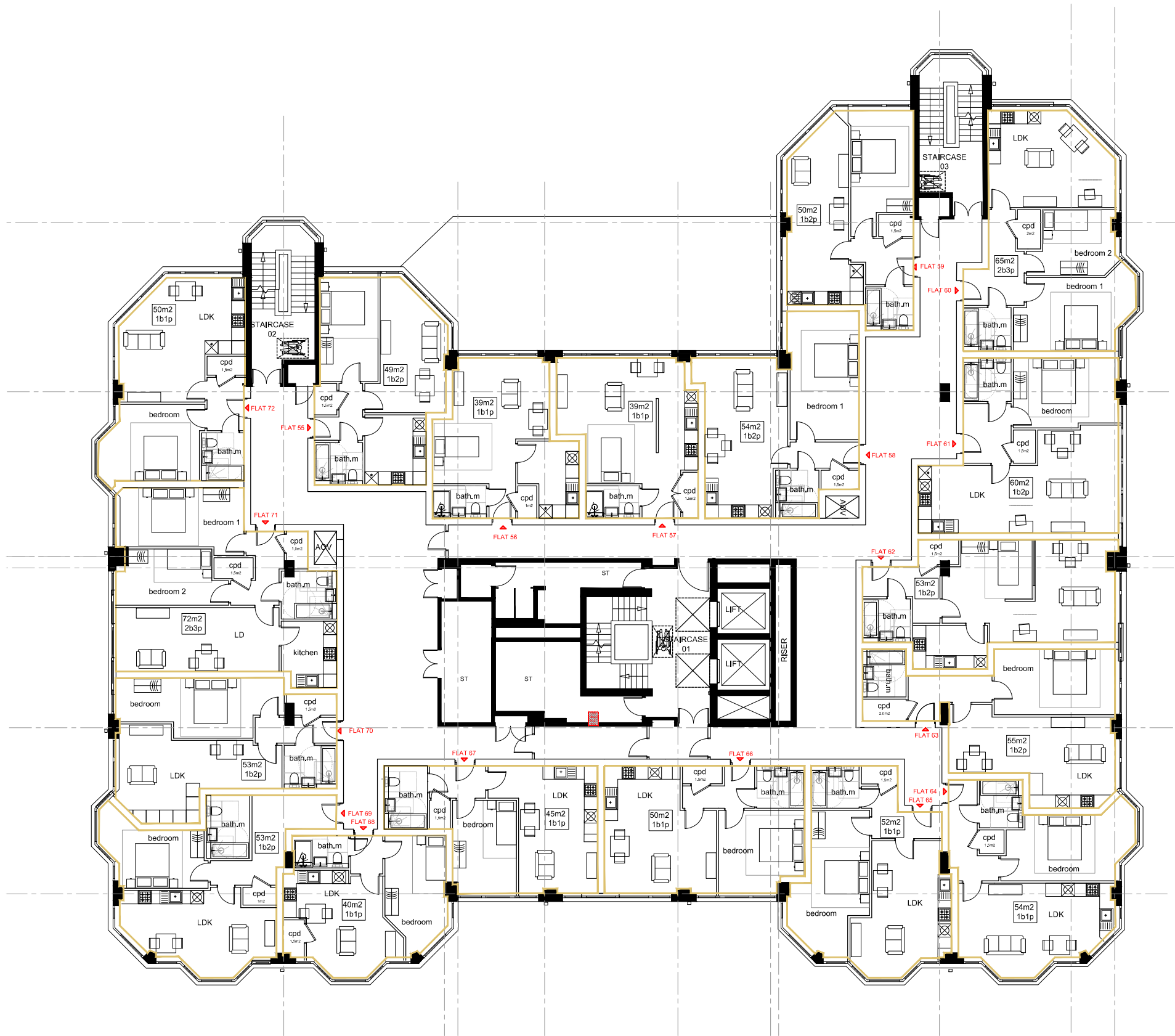
newport:
first floor, 5 gold tops,
newport, south Wales, NP20 4pg
tel: 01633 245020

e-mail: info@jdwarearchitects.co.uk
w: www.jdwarchitects.co.uk

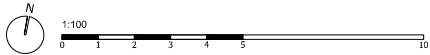
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PROPOSED THIRD FLOOR PLAN



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revisions:

client:
HMountley

project:
Abbey Wharf
Reading

description:
Proposed Third Floor



head office:
the old stone masons, 10 st johns st.
abergavenny, monmouthshire, np7 5rt
tel: 01873 851125 fax: 01873 851127

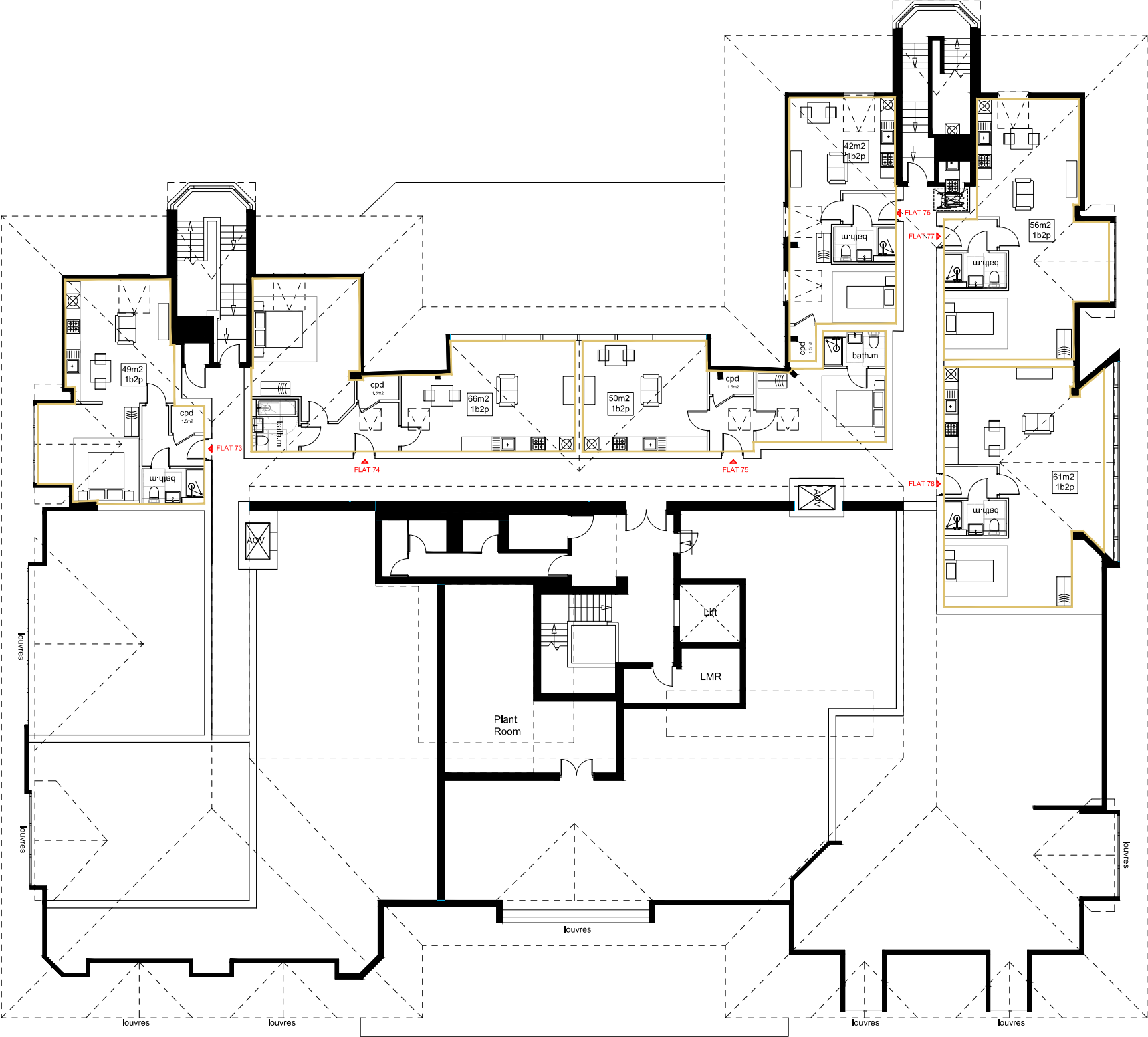
newport:
first floor, 5 gold tops,
newport, south wales, np20 4pg
tel: 01633 245020

e: mail: info@jdwarchitects.co.uk
w: www.jdwarchitects.co.uk

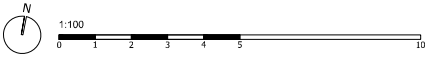
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PROPOSED ROOF FLOOR PLAN



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revisions:

client:
HMountley

project:
Abbey Wharf
Reading

description:
Proposed Roof Floor



head office:
the old stone masons, 10 st Johns St.
Abergavenny, Monmouthshire, NP7 5RT
tel: 01873 851125 fax: 01873 851127

newport:
first floor, 5 gold tops,
Newport, South Wales, NP20 4PG
tel: 01633 245020

e: mail: info@jdwarehitects.co.uk
w: www.jdwarchitects.co.uk

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