

Ref: MG/GI/CS/ROL01768

04th September 2025

Reading Borough Council

Civic Offices
Bridge Street
Reading
RG1 2LU

Dear Sir/Madam,

**THE PROPOSED DEVELOPMENT AT NAPIER COURT, READING – DAYLIGHT
WITHIN THE PROPOSED ACCOMMODATION**

Anstey Horne has prepared this report in respect of the Proposed Development at Napier Court, Napier Road, Reading, planning reference: PL/24/0846.

The Proposed Development comprises:

“Demolition of existing buildings and erection of new buildings of 11 and 12 storeys, with amenity space at roof level (part indoor and set back), to provide 576 build to rent residential dwellings (Class C3) with residential amenity space, parking, landscaping and associated engineering works.”

A technical assessment of the daylight and sunlight levels within the Proposed Development has been undertaken by MES Building Solutions, and the findings were submitted with the planning application in their report dated 4th November 2024.

The assessment found that 1,084 of the 1,573 rooms assessed (70%) either comfortably meet the BRE guidance for daylight provision, or could be considered ‘marginal’ i.e. which achieve the recommended lux values to marginally below 50% of their total room area. This is based on an assessment of the living/kitchen/dining rooms against the higher 200 lux target applicable to kitchens.

Of the rooms that fall short of the guidance, 80% are combined living/kitchen/dining rooms. It was summarised in the MES report that it is often difficult to meet the suggested daylight levels, as the entirety of the space is assessed against the daylight requirements for kitchens, which is not, in reality, the primary use of the room. Therefore, the results of this proposal were considered reasonable and comparable to other similar developments.

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An objection to the planning application was subsequently raised by Reading Borough Council ('RBC') which is set out as follows:

"Failure to provide an adequate standard of amenity for future occupiers in terms of poor outlook and access to daylight, particularly for those units to the rear of the development facing the service areas and railway boundary and the overall poor performance of the living kitchen diners in terms of daylight receipt (BRE confirm only 23% of these rooms would receive adequate daylight) (Policy CC8)."

In response to the above, Anstey Horne has been instructed by the developer, Sladen Estates, to prepare this report addressing the following points:

1. An examination of recently approved planning permissions, with particular regard to the overall daylight assessment pass rates of comparable schemes and the weight these outcomes carry in planning decisions.
2. A review of planning appeal decisions where Local Planning Authority refusals, citing daylight as a reason for refusal, have subsequently been overturned.
3. Consideration of the extent to which local authorities are prepared to adopt, or give weight to, alternative daylight standards for living/kitchen/dining rooms (LKDs), including the approach advocated by the Building Research Establishment ('the BRE').

The BRE Guidelines

While there are no mandatory standards for daylight provision in new buildings, most, if not all local authorities in the UK consider the suitability of a proposed development from a natural light perspective by reference to the BRE Guidelines, outlined in the BRE Report 209, '*Site Layout Planning for Daylight and Sunlight: A guide to good practice*' (third edition, 2022), which supersedes the second edition of the guide.

The updated 2022 BRE Guidelines introduced more sophisticated testing methodologies that take into account external reflectance and climate-based daylight modelling (CBDM) whereby an assessment can be based on weather data for various locations across the United Kingdom.

The BRE Guidelines give advice on minimum recommended Target Illuminance (TI) and Daylight Factor (DF) in habitable rooms in dwellings (outlined in the table overleaf). These are based upon the median illuminance/daylight factors that should be achieved over at least 50% of the assessment grid. The previously used Average Daylight Factor (ADF) methodology, which suggested targets of 1% ADF for bedrooms, 1.5% ADF for living rooms, and 2% ADF for kitchens, is no longer recommended for testing the proposed levels of light within new developments.

The suggested daylight levels according to the 2022 BRE Guidelines are set out in the table below:

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Room Type	Target Illuminance (TI)	Daylight Factor (DF)
Bedroom	100 lux	0.7%
Living Room	150 lux	1.1%
Kitchen	200 lux	1.4%

It is important to note that the BRE Guidelines are not mandatory. The advice given within them 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.

National and Regional Planning Policy

National Planning Policy

The Revised National Planning Policy Framework (updated 12 December 2024) sets out the Government's planning policies and how these are expected to be applied. It provides a framework within which councils can produce their own local plans that reflect the needs and priorities of their communities.

In terms of daylight and sunlight, under section 11 'Making effective use of land', paragraph 130(c) states that:

"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)."

Local Planning Policy

The Reading Borough Local Plan was adopted on 4th November 2019. This document sets out planning policies for development in Reading up to 2036, and is the main consideration in deciding planning applications.

In Section 4: General Policies, Policy CC8: Safeguarding Amenity states:

"Development will not cause a detrimental impact on the living environment of existing residential properties or unacceptable living conditions for new residential properties, in terms of:

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- Privacy and overlooking;
- Access to sunlight and daylight;
- Visual dominance and overbearing effects of a development;
- Harm to outlook;
- Noise and disturbance;
- Artificial lighting;
- Vibration;
- Dust and fumes;
- Smell;
- Crime and safety; or
- Wind, where the proposals involve new development of more than 8 storeys.

The position of habitable rooms, windows and outdoor living spaces will be particularly important. A back-to-back distance of 20 metres between dwellings is usually appropriate, although the circumstances on individual sites may enable dwellings to be closer without a detrimental effect on privacy.”

Paragraph 5.3.49 of the Local Plan also states that:

“In terms of effects of developments, the Building Research Establishment (BRE) has guidelines on assessing daylight and sunlight effects of development, which the Council will apply flexibly given the high density of the central area.”

Comparable Planning Permissions

In the following section we discuss comparable schemes and the relevant findings in relation to daylight provision within proposed accommodation.

1. Abbey Retail Park, Barking – Planning Reference: 23/01915/VAR

The application for Abbey Retail Park was approved in May 2025 as an extension to the original planning permission (planning ref: 18/02013/FUL). The original description of the proposed development was as follows:

“Phased comprehensive redevelopment of the site via clearance of the remaining structures and the erection of new buildings ranging from 2 to 29-storeys in height to provide 1,089 residential dwellings...”

The daylight and sunlight report appended to the planning application considered a representative sample of rooms at ground, first and second floor level in Phase 3 and at first, third, fifth, seventh, and ninth floor level in Phase 4. Of the 209 rooms assessed, 57 (29%) achieved the recommended lux values across 50% or more of their area when considering the higher 200 lux target for LKDs. Of the sample of LKDs assessed, nine of 71 (13%) achieved the recommended 200 lux target.

This scheme was ultimately approved, with the committee report stating that:

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“Whilst there are instances where the Daylight Provision targets are not met, the results are not abnormal in the context of an urban location, particularly given planning policy requirements to optimise site capacity.”

2. Land at Lea Bridge Road, London – Planning Reference: 242970

The application for the land at Lea Bridge Road was approved in March 2025 as an extension to the original planning permission (planning ref: 212685). The original description of the proposed development was as follows:

“Demolition of existing structures and redevelopment of three land parcels to deliver 345 x residential units...”

The daylight and sunlight report appended to the planning application considered all proposed habitable rooms within the development. Of the 1115 rooms assessed, 868 (78%) achieved the lux targets recommended by the BRE. In terms of LKDs specifically, 313 of 405 tested (77%) met the recommended 200 lux target. There were six LKDs which achieved the recommended target to 0% of their total area.

This scheme was ultimately approved, with the committee report stating that:

“In summary, officers consider that the proposed homes would provide an acceptable level of internal amenity for future residents”

3. Crown and Mayer Parry Wharf, Canning Town – Planning Reference: 23/00655/FUL

The application for Crown and Mayer Parry Wharf was approved in December 2023. The description of the proposed development was as follows:

“Redevelopment of the site (phased into two) comprising site preparation works and erection of seven new buildings ranging from 8 storeys to 30 storeys to provide 871 dwellings (Use Class C3) and 2,635sqm (GIA) employment space (Use Class E)...”

The daylight and sunlight report considered 2,410 rooms, of which 1,785 (74%) met the BRE suggested lux targets. When applying the lower 150 lux target to LKDs, the overall adherence rate increased to 79%. Many LKDs experienced particularly low light levels when assessed against the 200 lux target, with some achieving the recommended lux value to 0% of their total room area.

Against the lower 150 lux target, there remained a number LKDs achieving the target to 0% of their area. Nonetheless, the scheme was ultimately approved, with the Committee Report stated that:

“Having reviewed the assessment, officers are of the opinion that the Proposed Development represents a good level of daylight performance against the UKNA criteria, despite a minority of transgressions which are not unusual or unexpected with a development of this nature”

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4. 45 Beech Street, London – Planning Reference: 24/00176/FULL

The application for 45 Beech Street was approved in September 2024. The description of the proposed development was as follows:

“Partial demolition, extension and change of use of existing office building to co-living accommodation with associated internal and external amenity spaces.”

The daylight and sunlight report appended to the planning application considered a representative sample of proposed habitable rooms within the development, the vast majority of which were studio apartments. Of all 102 rooms assessed 43 (42%) met the recommended targets when considering the 200 lux recommendation for kitchens. Additionally, 10 studios achieved the recommended lux value to 10% or less of their area. When considering the lower 150 lux target applicable to living rooms, a further 10 units achieved the guideline values.

The scheme was ultimately approved despite a review of the submitted daylight and sunlight report by the BRE which noted:

“Overall, across the entire proposed development daylight provision would be mediocre.”

5. 65 Fleet Street, London – Planning Reference: 25/00663/NMA

The application for 65 Fleet Street was approved in August 2025 as an extension to the original planning permission (planning ref: 24/00648/FULMAJ). The original description of the proposed development was as follows:

“Partial demolition and refurbishment and extension of buildings to provide: purpose-built student accommodation comprising 856 rooms...”

Daylight and sunlight reports were produced in relation to both the original planning application and the non-material amendment application. All proposed studio apartments were assessed against the lower 150 lux target only. The results from both the original and the updated daylight and sunlight reports are detailed in the table below:

Planning Application	Overall Adherence Rate
24/00648/FULMAJ	North Block – 8/72 (11%) South Block – 317/784 (40%)
25/00663/NMA	North Block – 16/81 (20%) South Block – 313/794 (39%)

The scheme was ultimately approved, with the decision document stating that:

“Prior to the commencement of the relevant works, a detailed room layout shall be provided to the Local Planning Authority to demonstrate that student bedrooms have been laid out and designed to maximise daylight to desks/study areas and position these within the brightest parts of each room. Reason: To maximise daylight and sunlight to areas used for more light sensitive activities in accordance with the

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requirements of Local Plan Policies DM10.7, DM21.3 and DM21.5, London Plan Policies D3, D6 and H15(A)(5) and Draft City Plan Policy DE8.”

On the basis of the above, the local authority considered the daylight and sunlight results acceptable for the application but were clearly interested in the way that the rooms are laid out and want to ensure that the room uses with the highest requirements for light are located closest to the windows.

6. Central Quay, Glasgow – Planning Reference: 23/02295/FUL

The application for Central Quay, Glasgow was approved in September 2023. The description of the proposed development was as follows:

“Erection of mixed-use development comprising residential (Sui Generis), purpose-built student accommodation (Sui Generis) and commercial uses...”

The daylight and sunlight report appended to the planning application considered a representative sample of rooms across the proposed development. The rooms were tested on the basis of LKDs achieving the 200 lux target, and of the sample 1100 rooms assessed, 685 (62%) achieved the recommended lux values. In terms of LKDs specifically, 102 of the 288 sample rooms tested (35%) met the 200 lux target. There were 10 LKDs which achieved the recommended lux value to 0% of their assessment area.

The scheme was ultimately approved, with the decision document stating that:

“It is acknowledged that not all rooms and amenity spaces will be capable of achieving the recommended daylight and sunlight targets, particularly at lower levels and on the north side blocks which are naturally limited or obstructed. However, on balance it is considered that the delivery of appropriate placemaking outcomes and re-densification of the area outweigh these impacts.”

Summary of Comparable planning applications

The recently approved permissions we have reviewed demonstrate that, notwithstanding significant shortfalls against BRE daylight targets in some instances, Local Planning Authorities have accepted that the overall standard of residential amenity is adequate. These decisions reflect a consistent approach whereby the need to optimise site capacity and deliver high density development in urban contexts has been given greater weight than full technical compliance with daylight guidelines.

Planning Decisions Overturned at Appeal

In the following section we have reviewed recent planning appeal decisions which have successfully overturned a Local Planning Authority refusal, in which daylight was cited as an original reason for refusal.

1. Vastern Court, Vastern Road, Reading – Planning Ref: PL/20/0328

This development is situated along Vastern Road to the west of the Proposed Development at Napier Court. It was approved at appeal (appeal ref: APP/E0345/W/21/3289748) by the Secretary of State on 21st March 2024 and comprises:

“A demolition phase and phased redevelopment (each phase being an independent act of development) comprising a flexible mix of the following uses, Residential(Class C3 and including PRS), Offices (Use Class B1(a), development in Use Classes A1, A2, A3(etail), A4(public house), A5(take away), D1 and D2(community and leisure)...”

The daylight and sunlight report was issued in October 2021 and applied both the previously-used ADF assessment along with the updated Climate Based Daylight Modelling (‘CBDM’) assessments. The daylight and sunlight report analysed a representative sample of the proposed rooms on the lowest three floors of Blocks B and C.

Across Blocks B and C, the CBDM analysis results showed that, of the total 460 rooms analysed, 369 (80%) would meet the recommendations set out in the BRE when applying the lower 150 lux target for living rooms. When considering LKDs specifically, 108 of the 177 rooms analysed (61%) would achieve the lower 150 lux target.

The BRE reviewed the daylight and sunlight report in January 2022 and highlighted the same conclusions as noted above, while stating:

“These figures represent poor levels of daylight provision in the living rooms. Although the upper floors of Blocks B and C and most of Blocks A and D would be expected to have more light, having such a large number of living rooms below the minimum standard is unsatisfactory....”

The above led to the scheme being refused. However, it was then ultimately approved at appeal by the Secretary of State, with the appeal document stating:

“The Secretary of State has carefully considered the Inspector’s conclusions at IR625- 635, and the reasons given at IR711 concerning the harm caused to living conditions of existing and future occupiers. The Secretary of State considers that the amendments to the design code set out at IR631 provide an adequate baseline standard in the urban context and subject to the suggested conditions relating to the Parameter Plans, Schedule and Design Code at IR687, the Secretary of State considers that appropriate daylight and sunlight levels would be secured through subsequent reserved matters applications. As such, the Secretary of State affords moderate weight to the harm identified.”

2. 50 Clarendon Road, Watford – Planning Reference: 22/00484/FULM

This development was approved at appeal (appeal ref: APP/Y1945/W/23/3317838) on 26th September 2023 and comprises:

“Redevelopment of the site to provide a mixed use scheme including the provision of 247 build to rent residential units....”

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The daylight and sunlight report was issued in January 2023 and summarised that 498 of 616 rooms (81%) would meet the recommendations set out in the BRE when applying the lower 150 lux target for living rooms. When considering LKDs specifically, 119 of the 246 rooms analysed (48%) would achieve the lower 150 lux target. No assessment was undertaken using the higher 200 lux target for LKDs.

In light of the above, the Officer's Report to Committee which led to planning refusal stated that:

"The quality of the residential units within the development has been found to be very poor in respect of layout, aspect, size, sunlight, daylight, outlook, privacy, noise and external amenity area."

However, despite the above the scheme was ultimately approved at appeal, with the appeal document stating:

"84 of the proposed flats would not meet the BRE standards for daylight. However, it is very difficult to achieve full compliance with these criteria in the context of an urban location and a high density proposal. The failures are largely concentrated on pinch points, for example to the internal corners facing the proposed courtyard. Many of the most poorly lit areas are the kitchen elements of a combined living/kitchen room and the main living area of the room would be relatively well lit. In addition, the proposal is for a Build to Rent product with significant communal areas. The external communal areas would all meet the BRE guidance. Any deficiencies to individual flats or habitable rooms must be considered in this context because the living experience for future residents would not be confined to their individual dwellings. Therefore, whilst there would be a technical conflict with the BRE standards, the proposed flats would provide acceptable living conditions for future occupiers in respect of sunlight and daylight."

And:

"The overall quality of the proposed residential accommodation would be high and the living conditions for future occupiers would be acceptable. This, therefore, weighs neutrally in the planning balance, despite some technical conflicts with policy."

3. 1-4 Brixton Hill Place, London – Planning Reference: 22/01987/FUL

This development was approved at appeal (appeal ref: APP/N5660/W/23/3317382) on 28th July 2023 and comprises:

"Demolition of the existing buildings and redevelopment of site to provide a H shaped building ranging from 2 - 5 storeys in height comprising 24 self-contained residential units..."

The daylight and sunlight report was issued in February 2022 and applied the now superseded ADF method of assessment. In this assessment, 65 of 91 rooms (80%) achieved the recommended ADF target. Of the 19 LKDs assessed, 16 (84%) achieved the recommended target (noting that the higher 2.0% ADF target was applied).

In the planning decision document, one of the reasons for refusal was listed as:

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“Failure to demonstrate adequate provision would be made for natural light in accordance with the BRE Guide 'Site Layout Planning for Daylight and Sunlight 3rd edition (2022)”

Despite the above, the scheme was ultimately approved at appeal, with the appeal document stating:

“I have found that the proposal would create satisfactory living conditions for all future occupiers. This weighs neutrally in the planning balance.”

Summary of Planning Decisions Overturned at Appeal

The above appeal decisions demonstrate that, while Local Planning Authorities have refused schemes on the grounds of inadequate daylight provision, Inspectors and the Secretary of State have ultimately concluded that such schemes can still deliver acceptable living conditions in an urban context. In each case, the appeals were allowed on the basis that the overall quality of accommodation was considered sufficient, despite technical conflicts with BRE guidance.

Alternative Target Values and the BRE's Position

While it is often that case that Local Planning Authorities wish to see assessments carried out using the higher 200 lux target for shared living/kitchen/dining rooms, it is clear that they are also often willing to consider assessments against the lower 150 lux target.

It is worth noting that the BRE Guidelines state the following:

“Where a room has a shared use, the highest target should apply. For example in a bed sitting room in student accommodation, the value for a living room should be used if students would often spend time in their rooms during the day. Local authorities could use discretion here. For example, the target for a living room could be used for a combined living/dining/kitchen area if the kitchens are not treated as habitable spaces, as it may avoid small separate kitchens in a design.”

This wording makes clear that the BRE's recommended targets are intended to guide rather than prescribe outcomes, and that authorities are encouraged to apply discretion to avoid unduly constraining design quality. In particular, the guidance recognises that insisting on the higher 200 lux requirement across all parts of an LKD could encourage the creation of smaller, undesirable internalised kitchens.

In Reading, we have located evidence of the Local Authority accepting the lower guideline values on the basis of the previous ADF methodology for the development referred to as Thames Quarter at Napier Road. This scheme achieved an 86% adherence rate when testing against the 2.0% ADF target, and 95% when testing against the lower 1.5% ADF target. The BRE reviewed the daylight and sunlight report for this scheme on 12th January 2017 and stated in paragraph 3.1.1 of their review that 1.5% is a reasonable ADF target for a living/kitchen/diner (LKD).

In Havering, the scheme at Harold Wood Hospital achieved a high overall adherence rate of 93%. The scheme was originally refused, but granted permission on appeal, with the decision document stating:

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“Whilst I accept that the higher lux target would generally apply for internal spaces with a shared use, there is due scope for discretion in the BRE guidance to avoid the creation of small separate individual rooms. Thus, I accept a 150 lux level would be appropriate for living, kitchen, dining combined spaces when allowing for discretion to prevent undesirable smaller, segregated areas.”

Additionally, the BRE have reviewed the daylight and sunlight report for the Proposed Development at Napier Court and note within their report that:

“For combined living / kitchen / dining (LKD) areas, the MES report compares the results with the kitchen (200 lux) target. This is appropriate, but since the BRE Report suggests that in these situations a local authority may accept the lower living room (150 lux) target for the whole space, we have also compared the LKD results against this target.”

The above examples demonstrate both the BRE’s recognition of flexibility in applying the suggested targets, and the willingness of decision makers to adopt the lower 150 lux threshold where appropriate. This approach reflects an understanding that technical targets must be considered in the round and that the rigid application of the 200 lux target is not always necessary to secure acceptable living conditions.

Updated Assessment for Revised Scheme

While the results of the daylight assessment for the Proposed Development at Napier Court are in many cases comparable with the examples we have detailed within this report, the developer has nonetheless implemented comprehensive design alterations, resulting in an improvement in the daylight performance the proposed habitable rooms. A detailed summary of the latest assessment results is included within the updated daylight and sunlight report submitted the planning application, however, in summary of the latest assessment:

Assessment against 200 lux for LKDs:

- 1,379 of the 1,573 habitable rooms assessed (88%) meet the BRE guidance for daylight provision.
- 401 of the 576 LKDs assessed (70%) meet the 200 lux illuminance target recommended for kitchens.

Supplementary assessment against 150 lux for LKDs:

- 1,486 of the 1,573 habitable rooms assessed (94%) meet the BRE guidance for daylight provision.
- 507 of the 576 LKDs assessed (88%) meet the 150 lux recommended for living rooms.

In addition to the adherence rates cited above, it is worth noting that all of the LKDs within the scheme achieve the suggested daylight levels to at least 22% of their total area. It is also worth noting that the proposed LKDs have been designed such that the main living spaces are located closest to the window, with the kitchen areas located at the rear of the rooms where additional task lighting will be fitted.

The above indicates a significant improvement on the previous assessment results and demonstrates a high overall adherence rate when considering the scale of the Proposed Development, its urban context, and in comparison to the other schemes we have reviewed as part of this report, with the Proposed

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Development achieving results that are robust when tested against both the suggested 200 lux and 150 lux illuminance targets.

Conclusion

Anstey Horne & Co. Ltd. has prepared this report in response to Reading Borough Council's objection concerning the adequacy of daylight to the proposed units at Napier Court, Napier Road, with particular reference to the performance of living/kitchen/dining (LKD) rooms.

Our research indicates that comparable developments in the vicinity and further afield have been approved either during the planning process, or at planning appeal, notwithstanding significant shortfalls against BRE daylight targets. While Local Planning Authorities have not adopted lower daylight levels for LKDs as standard practice, the approved schemes identified within this report demonstrate that LPAs are willing to apply a degree of flexibility and use discretion when assessing the suitability of a scheme from a daylight and sunlight perspective, given as it is just one of many factors that require consideration in the wider planning context.

In relation to alternative daylight targets, the research we have undertaken demonstrates not only that the BRE recognises and specifically acknowledges the need for flexibility in applying the suggested illuminance targets, but also that there is a willingness of decision makers to adopt the lower daylight targets in situations where it is deemed appropriate.

The National Planning Policy Framework sets out that there is a clear requirement to make effective use of land to deliver the Government's target of 1.5 million new homes. The daylight performance of the Proposed Development should therefore be considered in this context and in the wider planning balance.

We trust the above is clear, however, please let us know if you have any queries.

Yours sincerely,



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