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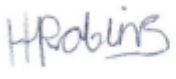
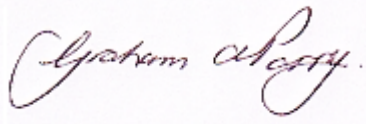
Danks Badnell Architects Ltd

Regents Gate, Crown Street, Reading

Interior Daylight Assessment

Status: Final

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1. INTRODUCTION

ACCON UK Limited (ACCON) has been commissioned by Danks Badnell Architects Limited on behalf of Eurospeak Build Limited to undertake an Interior Daylight Assessment to support a change of use planning application at Regents Gate, Crown Street, Reading, resulting in 29 No. apartments.

The assessment is required in order to determine if the proposed residential rooms will receive adequate light levels.

Appendix 1 provides a site location of the proposed development.

2. THE NATURE AND EFFECT OF DAYLIGHT AND SUNLIGHT

The provision of daylight is as important as ensuring low levels of noise or low levels of odour in maintaining the enjoyment of one's property. Adequate levels of daylight are important not only to light and heat the home, but also for an occupant's emotional well-being. Daylight is widely accepted to have a positive psychological effect on human beings and there is a great deal of evidence to suggest that people who are deprived of daylight are more susceptible to depression and mood swings. This is common in northern countries, such as Norway, Iceland and Canada where daylight is scarce during the winter months.

When assessing the effects of proposed building projects on the potential to cause issues relating to light, it is important to recognise the distinction between daylight and sunlight. Daylight is the combination of all direct and indirect sunlight during the daytime, whereas sunlight (for the purposes of this report) comprises only the direct elements of sunlight. For example, on a cloudy or overcast day diffused daylight still shines through windows, even when sunlight is absent.

Any development within a built-up area has the potential to alter the amount of daylight and direct sun received by nearby residential properties. Care should be taken when designing new buildings in built-up areas, especially when the proposed development is relatively tall or situated to the south of existing buildings, because in the northern hemisphere the majority of the sunlight comes from the south. In the UK (and other northern hemisphere countries) south-facing façades will, in general, receive most sunlight, while north-facing façades will receive sunlight on only a handful of occasions, specifically early-mornings and late evenings during the summer months.

It is therefore important to ensure that buildings to the south of any development do not cause overshadowing to existing dwellings and therefore reduce their capacity to receive sunlight.

3. ASSESSMENT CRITERIA

3.1. National Policy

The Department for Communities and Local Government (DCLG) sets national planning policy. The document 'The Planning System: General Principles' (2005), published in conjunction with 'Planning Policy Statement 1: Delivering Sustainable Development' (which has now been replaced by the National Planning Policy Framework), discusses the need to protect amenities in the public's interest, of which the need for daylight/sunlight could be considered one such amenity. However, the government does not have an adopted policy on daylight, sunlight and the effects of overshadowing, and does not have targets, criteria or relevant planning guidance in the way it has for other environmental impacts such as noise, landscape or air quality. However, three guidance documents are relevant when considering daylight, sunlight and overshadowing in dwellings:

- **The Building Research Establishment (BRE) report, "Site layout planning for daylight and sunlight – a guide to good practice – Third Edition 2022" by PJ Littlefair** (referred to as the BRE Report). Although not Government guidance, this report is commonly referenced as the main guide in the UK in determining the minimum standards of daylight and sunlight and identifies the assessment methodology for the impact trees may have on daylight and sunlight on a building;
- **British Standard BS EN 17037:2018+A1:2021 Daylight in buildings.** BS EN 17037:2018 superseded the British Standard *BS 8206-2:2008 "Lighting for buildings. Code of practice for daylighting"*. It contains guidance on the minimum recommended levels of interior daylighting and introduces some of the calculation procedures used in the BRE Report;
- **The Code for Sustainable Homes – Technical Guidance.** The Code's Technical Guidance Document determines its target criteria for well-lit homes, building upon the calculation procedures within the BRE Report and BS 8206:2008. It should be noted that the daylight element of the Code is not mandatory, suggesting that the targets within the Code are desirable, but not an essential planning constraint.
- **Planning Practice Guidance – Effective use of land – How are daylight and sunlight regulated?** – This section of the PPG summarises the considerations in respect to making effective use of land, including planning for higher density development. Paragraph 006 – "How are daylight and sunlight regulated?" (Reference ID 66-006-20190722) in particular focuses on the levels of daylight and sunlight within proposed developments and how developments affect daylight and sunlight levels on neighbouring occupiers and states:

"Where a planning application is submitted, local planning authorities will need to consider whether the proposed development would have an unreasonable impact on the daylight and sunlight levels enjoyed by neighbouring occupiers, as well as assessing whether daylight and sunlight within the development itself will provide satisfactory living conditions for future occupants.

In some cases, properties benefit from a legal ‘right to light’, which is an easement that gives a landowner the right to receive light through specified openings, and can be used to prevent this from being obstructed without the owner’s consent. Such rights are not part of the planning system, but may affect the scope for development on neighbouring sites.”

- **Planning Practice Guidance – Effective use of land – What are the wider planning consideration in assessing appropriate levels of sunlight and daylight?** – Paragraph 007 (Reference ID 66-007-220190722) in particular focuses on the context of the light levels of the development such as in city centre locations and states:

“All developments should maintain acceptable living standards. What this means in practice, in relation to assessing appropriate levels of sunlight and daylight, will depend to some extent on the context for the development as well as its detailed design. For example, in areas of high-density historic buildings, or city centre locations where tall modern buildings predominate, lower daylight and sunlight levels at some windows may be unavoidable if new developments are to be in keeping with general form of their surroundings.

In such situations good design (such as giving careful consideration to a building’s massing and layout of habitable rooms) will be necessary to help make the best use of the site and maintain acceptable living standards.”

3.1.1. National Planning Policy Framework

The National Planning Policy Framework (NPPF) as amended in February 2025 supersedes the December 2024 version of the NPPF.

The NPPF¹ “sets out the Government’s planning policies for England and how these should be applied and provides a framework within which locally-prepared plans for housing and other development can be produced.” The relevant section with respect to Daylight and sunlight is set out below:

Section 11 – Making effective use of land:

Paragraph 130 Bullet point ‘c’:

- c) *“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).”*

¹ Ministry of Housing, Communities and Local Government, 2024, National Planning Policy Framework

3.2. The BRE Report

The BRE Report contains guidance on how to design developments, whilst minimising the impacts on existing buildings from overshadowing and reduced levels of daylight and sunlight. As well as advice, the report contains a methodology to assess levels of daylight, sunlight, overshadowing, and daylight factors. However, the BRE report does state that the guidelines are not mandatory but should be considered a guide to help rather than constrain the designer.

The BRE document looks at three separate areas when considering the impacts on lighting:

- **Daylight** – i.e. the impacts of all direct and indirect sunlight during the daytime;
- **Sunlight** – i.e. the impacts of only the direct sunlight; and
- **Overshadowing of gardens and open spaces.**

Appendix 3 details the BRE Report, including the methodologies and full details of the criteria.

Table 3.1 summarises the criteria used to assess daylight and sunlight levels at the prior approval development.

Table 3.1: Summary criteria contained within the BRE Report

Parameter	BRE Report Ref.	Criteria	Acceptability Criteria
Daylight	Section 2.2	Angle to sky from horizontal	Maximum 25°
		Vertical Sky Component (VSC)	Greater than 27%
	Appendix C	Internal daylight - Spatial Daylight Autonomy (SDA)	Greater than 100-200 Lux over 50% of assessment grid*
	Appendix D	Percentage of the Working Plane beyond the No-Sky Line (NSL)	"Significant Part"+
Sunlight	Section 3.1	Sunlight Hours (SE)	Minimum 1.5 hours
	Section 3.2	Annual Probable Sunlight Hours (APSH) (Full Year)	Greater than 25%†
		Annual Probable Sunlight Hours (APSH) (Winter Months)	Greater than 5%†

Parameter	BRE Report Ref.	Criteria	Acceptability Criteria
Overshadowing	Section 3.3	Area of amenity space prevented from receiving any sun at all on the 21 st March	Maximum 40%

*= Varies depending on room use. See **Appendix 3** for full details.

+= Whilst the BRE Report describes the methodology for determining the percentage of the Working Plane that is in full sun, it does not give an acceptability criterion, only that supplementary electric lighting will be required if a "significant part" of the working plane lies beyond the no-sky line. However, the Code for Sustainable Homes and BS 8206:2008 suggests that each room requires a minimum of 80%

† = Applies only to main living rooms, not to bedrooms kitchens or other non-habitable rooms.

3.3. Daylight Assessment

The assessment of daylight is required for windows serving rooms in dwellings where daylight is required, including living rooms, kitchens and bedrooms. Windows to bathrooms, toilets, storerooms, circulation areas and garages need not be assessed. The guidelines also apply to any room that may have a reasonable expectation of daylight, including schools, hospitals, hotels and some offices.

When assessing daylight, the numerical criteria must be viewed flexibly and should be considered against other site layout constraints.

The actual interior daylighting of the building can be checked by using the Internal daylight - Spatial Daylight Autonomy (SDA) or Daylight Factor (DF) tests introduced in BS EN 17037:2018+A1:2021. The SDA methodology has been used within this assessment

The method for assessing internal daylight within a building is based on calculating the Lux levels achieved over specified fractions of the reference plane within habitable rooms.

BS EN 17037 provides minimum recommendations for daylight provision in interior spaces. For compliance with the standard, a daylight space should achieve the minimum level of recommendation for the room use as identified in **Table 4.1**.

3.4. Sunlight Assessment

When designing a new development or an extension to an existing building, the impact on the amount of sunlight received in the living areas of residential properties must be assessed, as residents are particularly likely to notice a loss of sunlight entering their homes.

The BRE Report provides guidelines for when the obstruction to sunlight may become an issue;

- at least one main window wall faces within 90° of due south, and
- A habitable room, preferably a main living room, can receive a total of at least 1.5 hours of sunlight on 21 March. This is assessed at the inside centre of the window(s); sunlight received by different windows can be added provided they occur at different times and sunlight hours are not double counted.

Due to the proposed development being a change of use development a sunlight assessment has been scoped out as the window locations or size will not change from the existing layout.

4. INTERIOR DAYLIGHTING

There are two recommended methodologies to assess the interior daylight levels within buildings: the “Illuminance” (Spatial Daylight Autonomy (SDA)) method and the “Daylight Factor” (DF) method. The Illuminance method has been used within this report and this method is based on calculating the Lux levels over specified fractions of the reference plane within a room.

A target illuminance value should be achieved across at least 50% of the reference plane, there are different illuminance values that need to be achieved depending on the room use. The illuminance levels that need to be achieved for each of the different room uses as set out within BS EN 1703: 2018 + A1:2021 are identified within **Table 4.1**.

Table 4.1: Target Illuminance Values

Room Use	Target illuminance (Lux) to be achieved for 50% of the assessment grid
LKD (Living Kitchen Dining)	200
Bedroom	100
Studio	200

When calculating the SDA the following variables are considered:

- The diffuse visible transmittance of the glazing including corrections for dirt on the glass and any blinds or curtains. Observations from a site visit undertaken on the 4th February 2026 noted that the windows were double glazed and clean, therefore a value of 0.68 has been used;
- A maintenance factor, allowing the effect of dirt of 0.8;
- The net glazed area of the window (m²);
- The total area of the room surface: ceiling, floor, walls and windows (m²); and
- The average reflectance values that have been used were advised by the client.
 - Walls, a value of 0.7 has been used assuming that they will be light-coloured rooms;
 - Floors, a value of 0.4 has been used; and
 - Ceiling, a value of 0.8 has been used.
 - Framing, a value of 0.6 has been used.
 - External Walls, a value of 0.2 has been used.

Table 4.2 identifies the results of the SDA calculations. The SDA contours for the light levels within the habitable rooms can be identified in **Appendix 2**.

Table 4.2: Percentage Area Meeting the Target Daylight Factors.

Room Number	Floor	Room Use	Percentage area meeting the Target Lux value for 50% of the assessment grid	Meets BRE Criteria
R1.0	Ground	LKD	60%	Yes
R1.1	Ground	Bedroom	100%	Yes
R2.0	Ground	LKD	100%	Yes
R2.1	Ground	Bedroom	100%	Yes
R3.0	Ground	LKD	80%	Yes
R3.1	Ground	Bedroom	100%	Yes
R4.0	Ground	LKD	94%	Yes
R4.1	Ground	Bedroom	100%	Yes
R4.2	Ground	Bedroom	100%	Yes
R5.0	Ground	LKD	93%	Yes
R5.1	Ground	Bedroom	100%	Yes
R6.0	Ground	LKD	67%	Yes
R6.1	Ground	Bedroom	100%	Yes
R7.0	Ground	LKD	100%	Yes
R7.1	Ground	Bedroom	100%	Yes
R8.0	Ground	LKD	100%	Yes
R8.1	Ground	Bedroom	100%	Yes
R9.0	Ground	LKD	68%	Yes
R9.1	Ground	Bedroom	100%	Yes
R10.0	First	LKD	96%	Yes
R10.1	First	Bedroom	100%	Yes
R10.2	First	Bedroom	100%	Yes
R11.0	First	LKD	100%	Yes
R11.1	First	Bedroom	100%	Yes
R12.0	First	LKD	74%	Yes
R12.1	First	Bedroom	100%	Yes
R13.0	First	LKD	100%	Yes
R13.1	First	Bedroom	100%	Yes
R14.0	First	LKD	51%	Yes
R14.1	First	Bedroom	100%	Yes
R15.0	First	LKD	61%	Yes
R15.1	First	Bedroom	100%	Yes
R16.0	First	LKD	67%	Yes
R16.1	First	Bedroom	100%	Yes
R17.0	First	LKD	54%	Yes
R17.1	First	Bedroom	100%	Yes

Room Number	Floor	Room Use	Percentage area meeting the Target Lux value for 50% of the assessment grid	Meets BRE Criteria
R18.0	First	LKD	100%	Yes
R18.1	First	Bedroom	100%	Yes
R19.0	First	LKD	100%	Yes
R19.1	First	Bedroom	100%	Yes
R20.0	Second	LKD	98%	Yes
R20.1	Second	Bedroom	100%	Yes
R20.2	Second	Bedroom	100%	Yes
R21.0	Second	LKD	100%	Yes
R21.1	Second	Bedroom	100%	Yes
R22.0	Second	LKD	79%	Yes
R22.1	Second	Bedroom	100%	Yes
R23.0	Second	LKD	100%	Yes
R23.1	Second	Bedroom	100%	Yes
R24.0	Second	LKD	58%	Yes
R24.1	Second	Bedroom	100%	Yes
R25.0	Second	LKD	68%	Yes
R25.1	Second	Bedroom	100%	Yes
R26.0	Second	LKD	77%	Yes
R26.1	Second	Bedroom	100%	Yes
R27.0	Second	LKD	65%	Yes
R27.1	Second	Bedroom	100%	Yes
R28.0	Second	LKD	100%	Yes
R28.1	Second	Bedroom	100%	Yes
R29.0	Second	LKD	100%	Yes
R29.1	Second	Bedroom	100%	Yes

It can be identified in **Table 4.2** that all of the rooms meet the minimum illuminance values as identified in **Table 4.1** for at least 50% of the reference plane, and therefore all of the rooms within the proposed development will receive adequate internal light levels.

5. CONCLUSIONS

Calculations were conducted in accordance with the BRE Guidelines and BS EN 17037:2018+A1:2021 to determine if the proposed change of use development at Regents Gate, Crown Street, Reading would receive acceptable levels of internal daylight.

The Lux levels have been calculated to assess the internal light levels within the development. All of the rooms meet the minimum recommended Lux values for at least 50% of the room, therefore all of the rooms will receive adequate light levels.

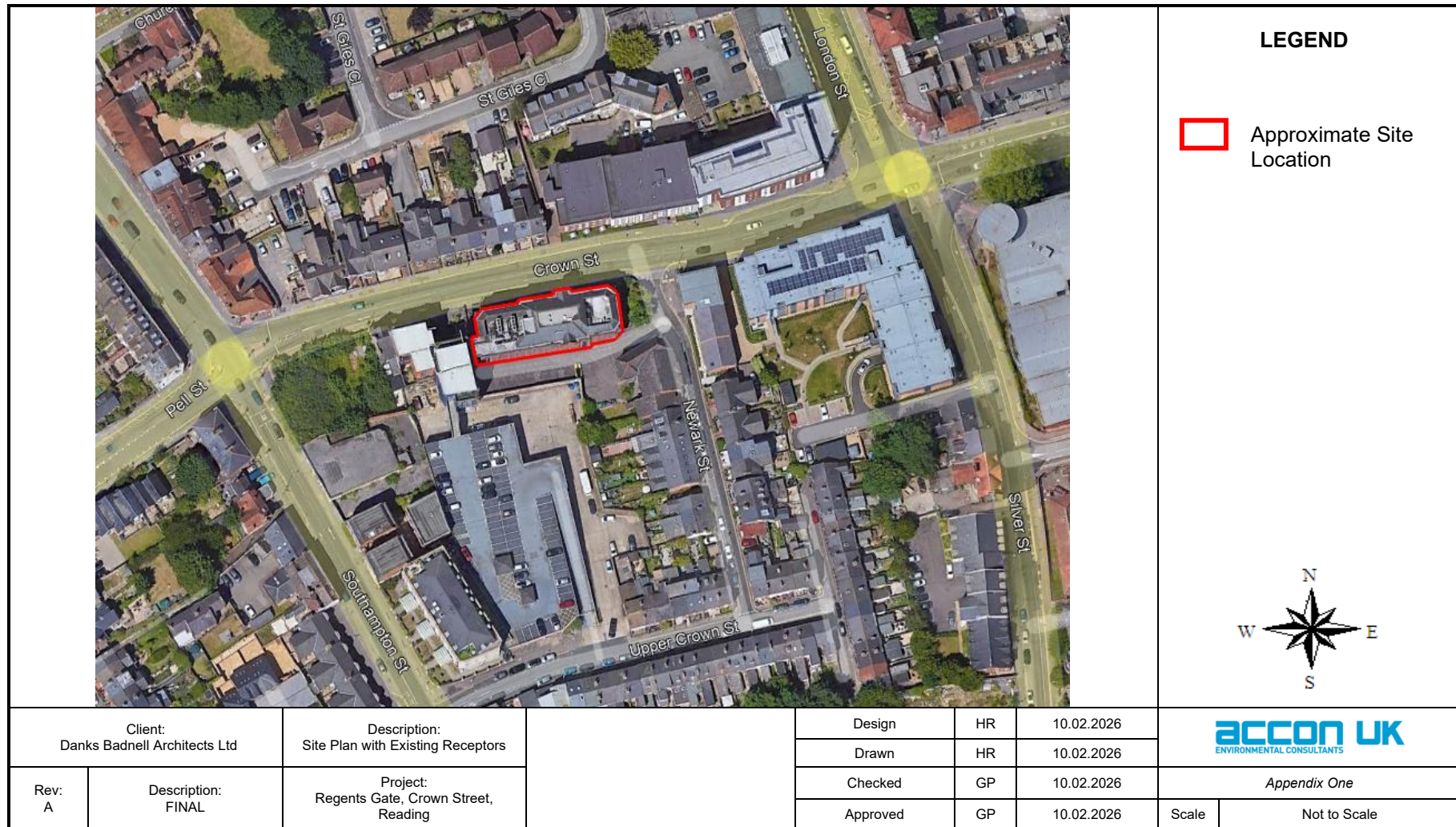
It can be concluded from the internal daylight assessment that all the rooms will receive good levels of natural light throughout all of the rooms.

APPENDICES

Appendix 1

Development Site Plan with Relevant Receptor

Figure 1: Site Location and Relevant Receptors



Appendix 2 **SDA Contours**

Figure 2: Ground Floor Illuminance

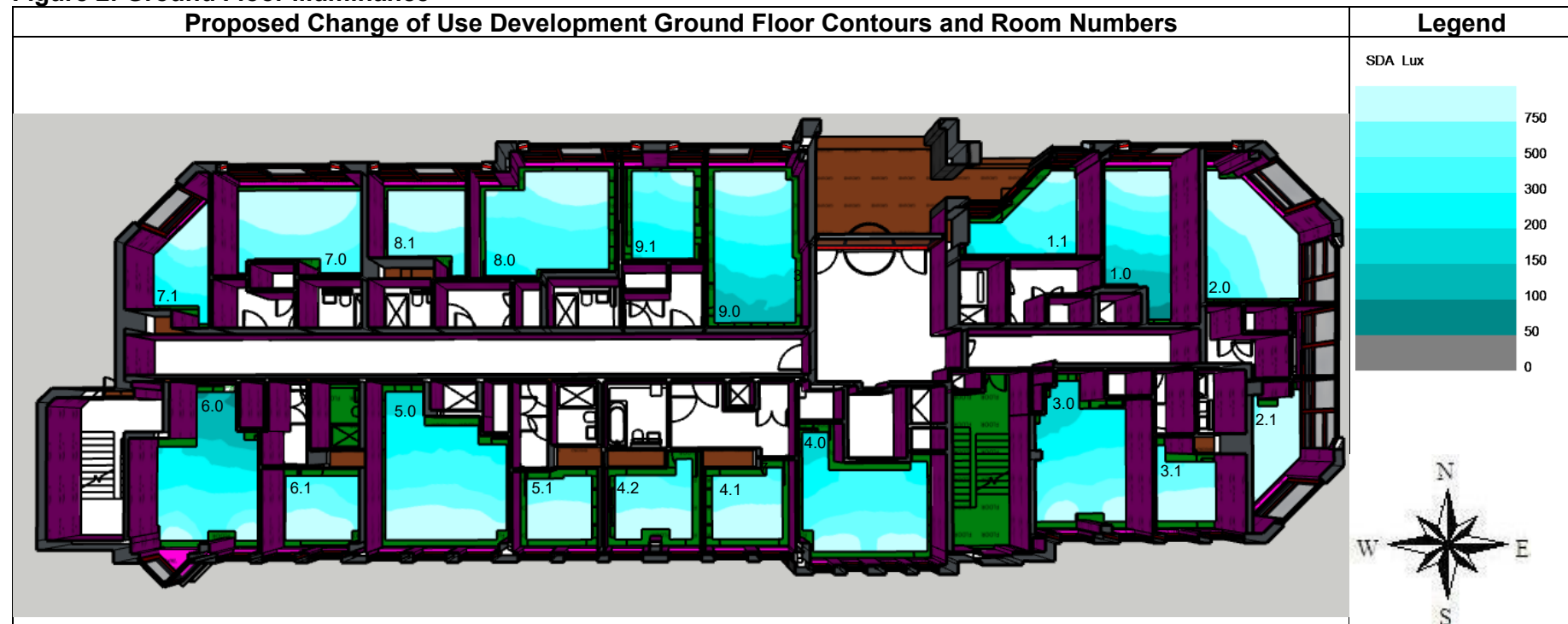


Figure 3: Second Floor Illuminance

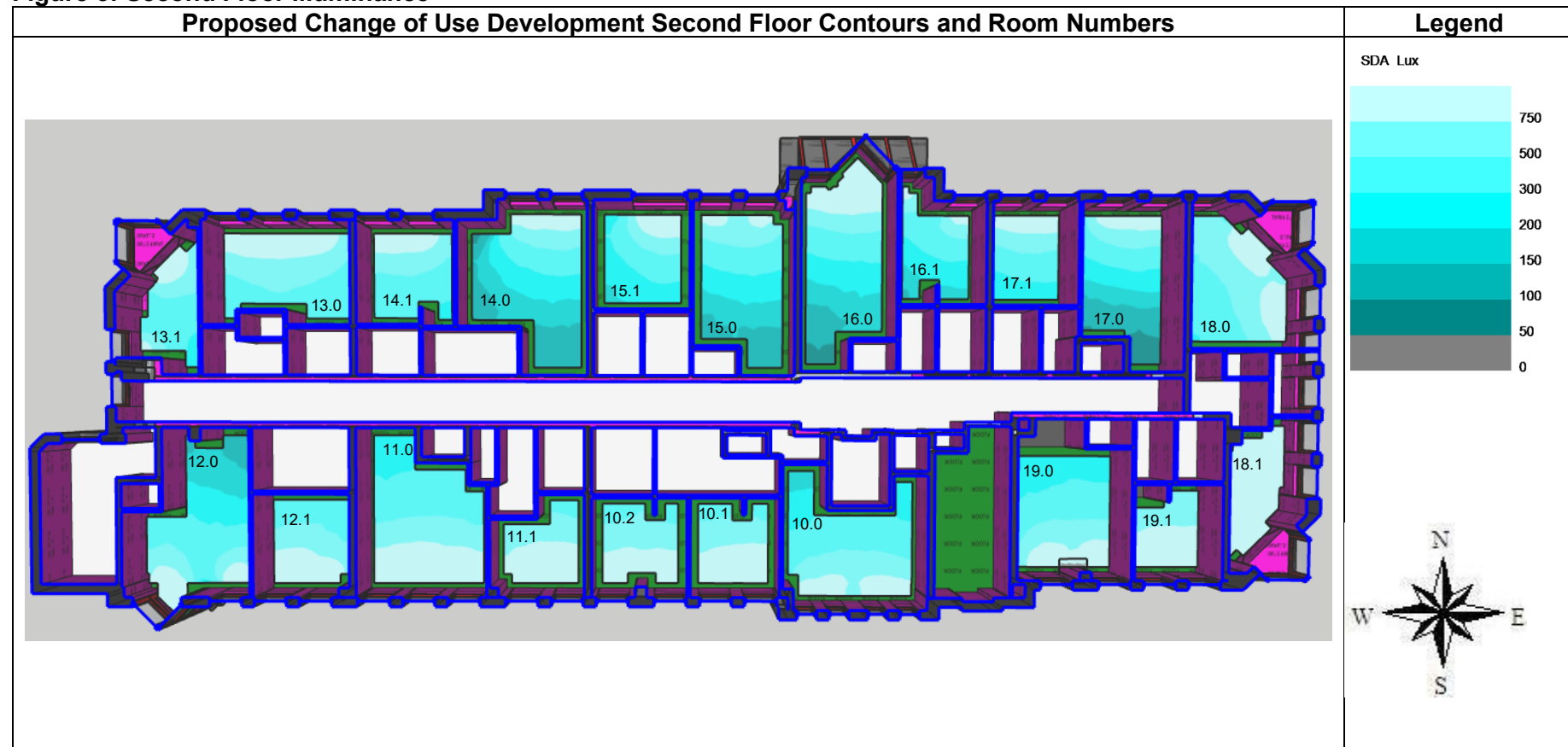
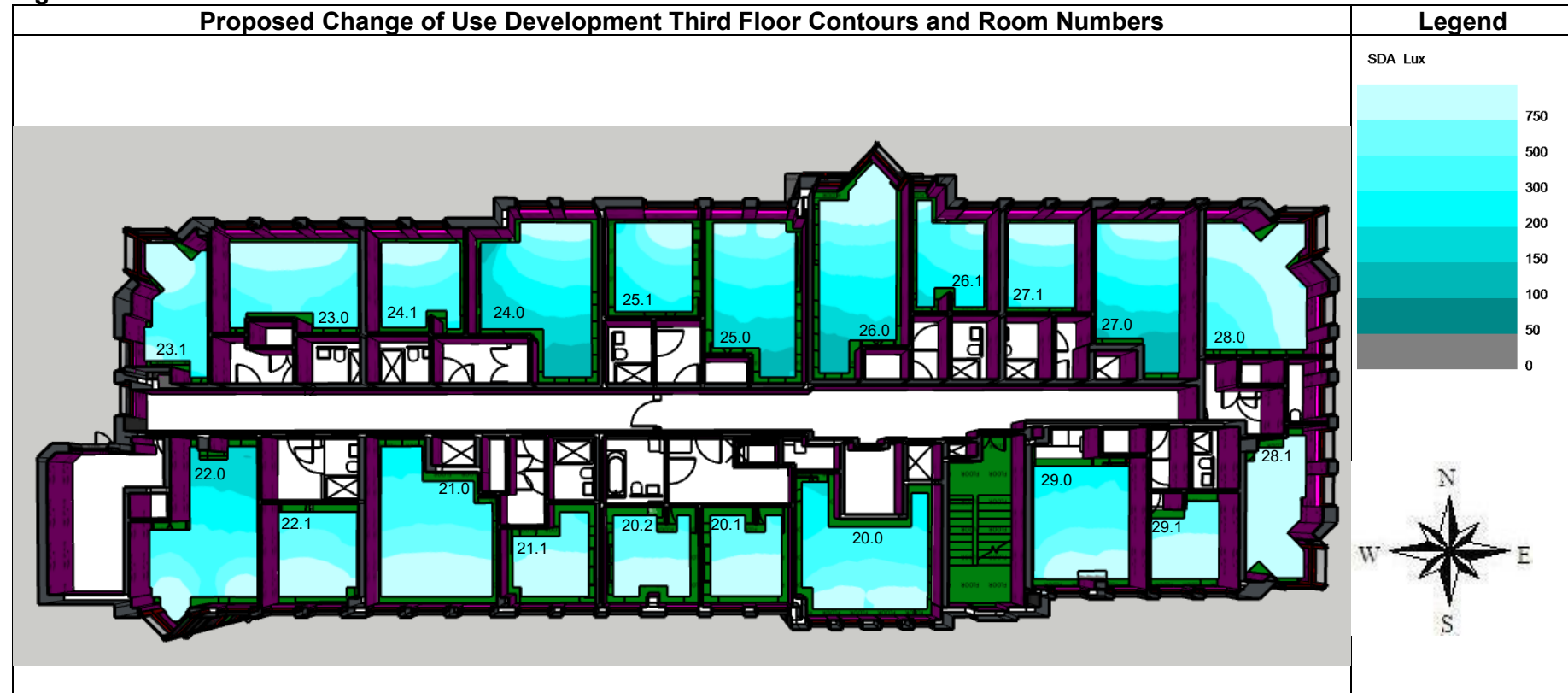


Figure 4: Third Floor Illuminance



Appendix 3 **The BRE Report**

Appendix 4: The BRE Report

When considering daylight and sunlight assessments, reference is often made to the Building Research Establishment (BRE) Report, "Site layout planning for daylight and sunlight - a guide to good practice" by PJ Littlefair.

The BRE Report contains guidance in how to design developments, whilst minimizing the impacts on existing buildings from overshadowing and reduced levels of daylight and sunlight. As well as advice, the report contains a methodology to assess levels of daylight/sunlight and contains criteria to determine the potential impact of a new development on surrounding buildings. However, the report does state that the guidelines are not mandatory but should be considered a guide to help rather than constrain the designer.

A2.1 Daylight

Contained within the three relevant documents, there are three criteria and calculation procedures to determine levels of daylight. Each one has its limitations and is used in different circumstances. The criteria are:

- The 25° Rule and the Vertical Sky Component
- Average Daylight Factor
- No-Skyline and the Working Plane

A2.1.1 The 25° Rule and Vertical Sky Component

The BRE Report contains guidance on how to design developments, whilst minimising the impacts of existing buildings from overshadowing and reduced levels of daylight and sunlight, as well as ensuring developments are adequately daylit. The report suggests that in general, a building will have the potential for good interior diffuse daylighting providing that:

- a) No obstruction, measured in a vertical section perpendicular to the main face, from a point 2m from the ground level, subtends an angle of more than 25° to the horizontal;

or

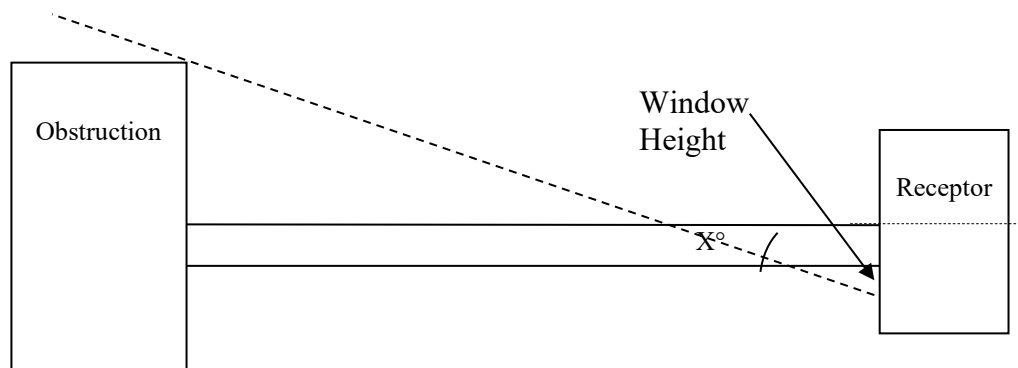
- b) If a) is not satisfied, then all points on the main face on a line 2m above ground level are within 4m (measured sideways) of a point which has a Vertical Sky Component (VSC) of 27% or more.

The report contains a methodology for calculating the VSC, but also indicates that the methodology for calculating the levels of interior daylighting in BS8206-2 should also be used where appropriate.

The report highlights a simplified procedure that can be used to screen new developments to determine whether a more detailed assessment is required. This screening method considers the extent to which the angle of view of the sky from the centre of the lowest window of the existing properties will be constrained by the proposed new buildings. If the new development subtends an angle of less than 25° to the horizontal from the lowest window of the existing property, then it is unlikely that the development will cause any substantive effects of the lighting of existing buildings; greater than 25° and further analysis will be required to determine the

extent to which there will be a loss of daylight to the existing building. A schematic example of this calculation can be seen in **Figure A2.1**.

Figure A2.1: Schematic Example of Daylight Calculations



If the screening method determined that there may be an obstruction, the exact level of light can be calculated by determining the Vertical Sky Component (VSC). The BRE Report highlights a number of ways to calculate the VSC, including the skylight indicator method and the Waldram Diagrams.

When undertaking a daylight assessment, the BRE Report suggests a VSC of 27% or more should be achieved if a room is to be adequately day lit. It also suggests that when existing levels of daylight are below 27% VSC, a reduction of more than 20% from the existing level will be noticeable to the inhabitants, i.e., an impact will occur.

With regard to the surrounding properties, greater protection should be afforded to windows that serve habitable dwellings and, in particular, those serving living rooms and family kitchens. The tests can also be applied to non-domestic uses such as offices and workplaces where such uses will ordinarily have a reasonable expectation of daylight or sunlight. However, retail outlets such as shops and high street banks are not generally considered to have a reasonable expectation of daylight or sunlight. It is considered that retail outlets and point-of-sale displays do not rely on daylight or sunlight but on electric lighting. Assessment for daylight and sunlight is not therefore considered necessary in those instances.

The use of the VSC does have a number of limitations. For example, the calculation procedure only calculated the amount of light falling on the wall on question, it does not take into account the size of the windows or the size of the room that it is intending to light. Consequently, it is possible to design a room that would be adequately daylighted through sensible room and window design (e.g., shallow rooms and large windows, or the use of roof lights), but the VSC will still show a low level of light falling on the wall. The VSC calculations do not take into account how designers may maximise the available light within a dwelling.

A2.1.2 Interior Daylight Recommendations

The VSC only determined whether a room has the potential for good interior daylighting. The actual interior daylighting of the building can be checked by using the illuminance methodology introduced in BS EN 17037.

BS EN 17037 supersedes BS 8206 Part 2 “Code of practice for daylighting”, which contained a method of assessment based on Average Daylight Factor, which is now no longer recommended.

For daylight provision in buildings, BS EN 17037 provides two methodologies. One is based on target illuminances from daylight to be achieved over specified fractions of the reference plane (a plane at table top height covering the room) for at least half of the daylight hours in a typical year. The other, method is based on calculating the daylight factors achieved over specified fractions of the reference plane.

BS EN 17037 provides three levels of recommendation for daylight provision in interior spaces: minimum, medium and high. For compliance with the standard, a daylight space should achieve the minimum level of recommendation.

The recommendations for side lit rooms are met if both target illuminance (the median daylight factor over 50% of the reference plane, and the minimum illuminance over 95% of the reference plane) are achieved.

Table A2.1: Target Illuminance

Level of Recommendation	Target illuminance ET (lx) for half of assessment grid	Target illuminance ET (lx) for 95% of assessment grid
Minimum	300	100
Medium	500	300
High	750	500

A2.1.3 No-Skyline and the Working Plane

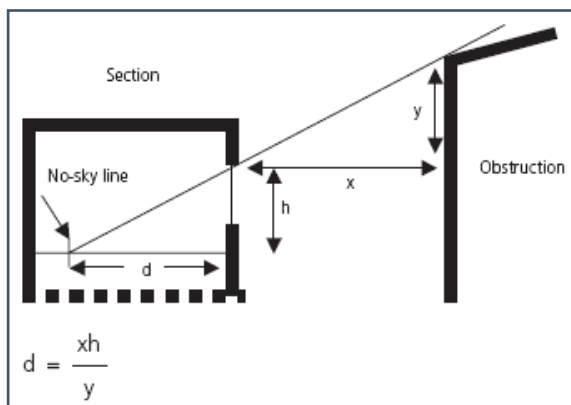
Whilst the ADF and VSC determine the amount of daylight in a room, the no-skyline determines how well the daylight is distributed in the room. Areas beyond the no-skyline will generally look gloomy.

The working plane is a notional surface, typically at about desk or table height, at which the daylight factor or the 'no-skyline' is calculated or plotted. For calculations in dwellings, it is taken to be at a position 0.85m above the floor.

The no-skyline divides those areas of the working place which can receive direct skylight, from those which cannot. If the external obstructions already exist, it is possible to measure directly the position of the no-skyline in a room.

As an approximation, obstructions that are parallel to the window can be considered infinite. The no-skyline will then be parallel to the window at a distance 'd' from the window wall. **Figure A2.2** illustrates how the no-skyline can be calculated. If 'd' is greater than the room depth, then no part of the room lies beyond this no-skyline.

Figure A2.2: Pictorial calculation of the No-Skyline



Where:

h = height of the window head above the working plane

y = height of the obstruction above the window head

x = distance from the window to the obstruction

A2.2 Sunlight

Whilst daylight is an essential element of all dwellings, sunlight is considered to be desirable rather than essential. The BRE Report suggests that not all windows need to have access to direct sunlight and that direct sunlight is most desirable in living rooms and kitchens and less important in bedrooms.

When designing a new development or an extension to an existing building, the impact on the amount of sunlight received in the living areas of residential properties must be assessed, as residents are particularly likely to notice a loss of sunlight entering their homes.

Sunlight availability for existing buildings can be measured in Annual Probable Sunlit Hours (APSH). The APSH assessment determined the amount of probable sunlight that will shine on the window in a typical year.

The BRE Report suggests that to ensure that existing dwellings appear reasonably sunlit, at least one main window wall should face within 90° of due south and that the window received at least 25% of the total APSH available during a given year, and at least 5% of the total APSH during the winter months. Consequently, not every window in a dwelling need to achieve the minimum levels of sunlight, nor does every room in a dwelling.

When assessing the impact on sunlight from a new development on an existing development if the levels with the development proposals include an APSH less than 0.8 times their former value, then the existing occupants will notice the loss in sunlight.

For new buildings a habitable room, preferably a main living room, should receive a total of at least 1.5 hours of sunlight on 21 March. This is assessed at the inside centre of the window(s); sunlight received by different windows can be added provided they occur at different times and sunlight hours are not double-counted.



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