

Ref: WW/EK/ROL01535

29 April 2026

Sian Thomas

HGH Consulting
45 Welbeck Street
London W1G 8DZ

Dear Sian,

ABBEY GARDENS, ABBEY STREET, READING, RG1 3BA (PLANNING APP REF. PL/26/0091) – LIGHT WITHIN THE PROPOSED DEVELOPMENT

Anstey Horne has been instructed by McGrath Group (“the Applicant”) to review the proposed redevelopment at Abbey Gardens, Abbey Street, Reading, RG1 3BA (“the Site”), in respect of daylight and sunlight availability to the proposed residential units (“the Proposed Development”).

The building currently benefits from prior approval consent, refs: PL/25/0202 and PL/25/0918, (the “Prior Approval Consents”) for the conversion of the existing offices to residential use, creating a number of new apartments within the existing structural envelope. The current proposal seeks to update and enhance the building’s external appearance to better reflect its new residential function and to deliver a more contextually appropriate façade that integrates sensitively with its surroundings.

We write to respond to a number of the points raised by Hawkins Environmental in their third-party review dated 27th March 2026 (“the Hawkins Review”). Hawkins were instructed by Reading Borough Council (“RBC”) to review a technical daylight and sunlight report of the proposed accommodation which was prepared by Anstey Horne and dated 24th December 2025 (“the AH Report”) on behalf of the Applicant. Subsequent to being supplied with the Hawkins Review, a meeting took place on 16th April 2026, between Anstey Horne and Hawkins Environmental, in order to discuss the key areas of investigation and where possible, provide clarifications and additional information to assist with their independent review.

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We understand the key points raised within the Hawkins Review to include:

- 1) Methodology used;
- 2) Scope of assessment, including the omission of spaces and daylight criteria applied;
- 3) Reflectance values applied; and
- 4) Sunlight.

At the outset, it is important to note that the BRE Guidelines “*Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice*” (third edition, 2022) is an advisory document and is intended to be applied flexibly. In practice, daylight and sunlight assessments necessarily involve an element of professional judgement in flexibly applying the guidance as the BRE recommend, particularly relevant on constrained urban sites and where schemes are shaped by design, site and wider planning balance considerations.

We discuss the key points below:

1. Methodology used

Hawkins consider that the assessment has been carried out in accordance with the Building Research Establishment Report, 209, ‘Site layout planning for daylight and sunlight (third edition, 2022), commonly referred to as “the BRE Guidelines”. They agree that it is appropriate to consider the illuminance method for daylight and sunlight exposure for sunlight when assessing the proposed levels of light amenity with the residential accommodation.

2. Scope of assessment, including the omission of spaces and daylight criteria applied

Where kitchens or dining spaces have not been assessed, this reflects the proposed internal arrangements as shown on the architect’s drawings received 19 December 2025, including instances where spaces are internalised and do not contain windows. As a matter of principle, internalised spaces enclosed by a wall and without an external window do not fall within the normal scope of a daylight assessment, given that there is no window opening through which daylight availability can be assessed. Their omission from the technical assessment is therefore consistent with the proposed layouts provided.

As to whether the internal configuration of such spaces is acceptable in overall design and planning terms, this is a broader matter for RBC to consider and beyond the remit of a daylight and sunlight surveyor.

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With regard to the daylight criteria used in the assessment, it is common practice for combined living/kitchen/dining (LKD) rooms to be assessed against both the 150-lux target associated with living areas and the 200-lux target used for kitchen areas. Where relevant, both sets of results have been provided in order to give RBC a comprehensive understanding of how the spaces perform relative to the BRE's recommended targets for a specific room usage. We understand that Hawkins have queried whether this approach is relevant, given the omission of internalised spaces from the assessment however, as discussed above, the scope of assessment has been design-led and based on the proposed rooms that will have windows and thus an expectation to receive a certain degree of natural light amenity.

Notwithstanding the internalised spaces, the lux contour drawings appended to our report demonstrate the daylight availability within the assessed rooms and the daylight availability shown in these spaces would not vary if the partition walls were removed in the design. On this basis, these rooms do all achieve reasonable daylight levels to the front portions of the room where the main habitable living space is located.

3. Reflectance values

The internal reflectance values used in the assessment fall within the ranges suggested by the BRE guidance, albeit sit at the upper end of those ranges as there is justification for the parameters as part of the AH Report. The adopted values are not unusual for a residential scheme of this nature, where the assessment assumes light-toned finishes, including white walls/ceilings and light wood floors. Hawkins advised that if the project architects are able to confirm that the proposed internal finishes align with the reflectance values utilised within the assessment, that this would satisfy this area of query. The architect has confirmed that the finishes proposed align with the reflectance values inputted and the project team has provided a photo (which is attached) of another scheme they have developed, showing the final finishes - white walls/ceiling and light wood floors. For the avoidance of doubt, the reflectance values used within the assessment are consistent with those used in the reports submitted with the Prior Approval Consents.

Lastly, we would also note that demonstrating how internal finishes are maintained over time is not a specific requirement of the BRE and so would not form part of the scope of assessment.

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4. Sunlight

Hawkins' review acknowledges that the sunlight analysis identifies that south-facing living rooms perform well overall. It is general practice that usually only half of the proposed rooms within a development can face within 90 degrees of due south and Hawkins recognise that some dwellings in developments of this nature will inevitably receive no direct sunlight.

It is also relevant that the queries on reflectance values do not relate to the sunlight exposure analysis, given that the assessment is taken at the window, nor does the presence of internalised kitchens relate to the interpretation of the sunlight results, given that the BRE prioritise sunlight to main living areas.

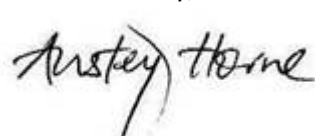
Conclusion

In summary, our understanding is that the points raised within the Hawkins Review relate mainly to the scope of the assessment, rather than to any queries as to the overall technical methodology which is agreed as between surveyors.

As acknowledged within the Hawkins Review, the BRE Guidelines is an advisory document and is intended to be applied flexibly. With a practical and flexible application of the BRE's recommendations in mind, we consider that the daylight and sunlight submission provides an appropriate basis for the Council's consideration of the application. The scope of analysis is consistent with the proposed layouts and values applied are within the BRE's parameters by reference to internal daylight and sunlight testing.

In our view, the results of the daylight and sunlight assessment demonstrate that future occupants will have good access to daylight and sunlight amenity whilst also striving to enhance the building's external appearance to better reflect the proposed residential usage.

Yours sincerely,



Anstey Horne

Encl. Appendix A

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APPENDIX A – PROPOSED INTERNAL FINISHES



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