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**DAYLIGHT &
SUNLIGHT:**

**PROVISION WITHIN THE
PROPOSAL**

relating to

**PADDINGTON PACKET
BOAT PUBLIC HOUSE,
HIGH ROAD,
UXBRIDGE
UB8 2HT**

**APRIL 2026
Ref: 2001/E rev**

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Drawing Nos. 900 & 901 Self-test – Daylight SDA plots (Ground and First Floor)

1.0 EXECUTIVE SUMMARY

- 1.1 This Daylight and Sunlight Report considers the provision of daylight and sunlight within the proposal at the former Paddington Packet Boat Public House site for future occupants relating to the proposed new-build student accommodation. This is in response to design changes within the internal layout arrangement and our subsequent instructions received to consider such provision within the proposal further to the extant planning permission (Planning ref. 1058/APP/2021/3423 – consent granted 8th September 2023).
- 1.2 The results of our analysis examination are based upon the standard assessment procedure of the BRE Guide 'Site Layout Planning for Daylight and Sunlight - A Guide to Good Practice' 3rd Edition 2022 (The BRE Guide).
- 1.3 Daylight review has been analysed at ground floor and 1st floor and given the commonality of the floor layouts and results, extrapolated for the subsequent floors above; this is considered an acceptable approach in reference to the BRE Guide. Given the proposal is for student accommodation, sunlight provision is considered not applicable for each student studio room but rather to key communal rooms namely, the residents' main lounge / amenity area at ground floor which has been assessed.
- 1.4 The results of our daylight analysis review, confirms that 100% of all habitable rooms comprising 73 No. student studio rooms and 1 No. residents' lounge are expected to meet the target illuminance levels for daylight provision (on the basis that student studio rooms which incorporate a multi-use including living/bedroom/kitchenette are targeted on a predominant room use of 150 lux median illuminance i.e. 'living area' for at least 50% of the room area during half of the daylight hours).
- 1.5 For sunlight within student accommodation, it is reasonable to consider provision to the residents' main lounge / amenity area (located at ground floor) which would meet the BRE Guide recommendation of achieving at least one and a half hours of sunlight on the 21st March equinox.
- 1.6 We conclude that for this iteration, the provision of daylight and sunlight within the proposal is considered suitable and meets reasonable targeting criteria in reference to the BRE Guide and industry consideration and on that basis, should also be considered acceptable.

2.0 OVERVIEW

- 2.1 The former Paddington Packet Boat Public House site has an extant planning permission (Planning ref. 1058/APP/2021/3423 – consent granted 8th September 2023);

“Demolition of the public house (Sui Generis) and erection of purpose-built student accommodation (Sui Generis) and associated common areas and facilities, landscaping, amenity space, bicycle and motorcycle parking, and refuse storage.”

- 2.2 The latest iteration of the scheme incorporates design changes to the internal layout arrangements within the proposal for which Schroeders Begg have been instructed to update provision within the proposal of daylight and applicable sunlight as per this report.

- 2.3 For daylight provision, 74 No. habitable rooms have been review comprising; 73 No. student studio rooms and 1 No. residents’ main lounge / amenity area at ground floor. For sunlight, given the student use, it is reasonable to consider provision to the residents’ main lounge / amenity area.

3.0 PLANNING POLICY

- 3.1 Relevant planning policy to daylight and sunlight has been considered at a national and regional local level. We summarise some of the main policy extracts as follows;

National Planning Policy - National Planning Policy Framework (December 2024)

- 3.2 The National Planning Policy Framework (December 2024), sets out the Government's planning policies for England and how these should be applied. It provides a framework within which locally-prepared plans for housing and other development can be produced. In terms of development, chapter 11. of the National Planning Policy Framework (NPPF) relates to 'Making effective use of land' and in particular;

***Para. 124:** Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land.*

***Para. 130. 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).*

London Regional Planning Policy – Mayor of London

The London Plan (March 2021) - Mayor of London

- 3.3 The London Plan (March 2021), represents the Spatial Development Strategy (SDS) published by the Mayor, known as the London Plan. The London Plan is an overall strategic plan for London and sets out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years.

- 3.4 Chapter 3. of the London Plan deals with 'Design' and in particular;
Policy D3 Optimising site capacity through design-led approach;

***Policy D3 (A):** All development must make the best use of land by following a design-led approach that optimises the capacity of sites, including site allocations. Optimising site capacity means ensuring that development is of the most appropriate form and land use for the site. The design-led approach requires consideration of design options to determine the most appropriate form of development that responds to a*

site's context and capacity for growth, and existing and planned supporting infrastructure capacity (as set out in Policy D2 Infrastructure requirements for sustainable densities), and that best delivers the requirements set out in Part D

Policy D3 (D): *Development proposals should:*

Form and layout (part extract)

- 1) *enhance local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation, scale, appearance and shape, with due regard to existing and emerging street hierarchy, building types, forms and proportions*

Experience (part extract)

- 7) *deliver appropriate outlook, privacy and amenity*
- 10) *achieve indoor and outdoor environments that are comfortable and inviting for people to use*

Policy D6 Housing quality and standards;

Policy D6 (C): *Housing development should maximise the provision of dual aspect dwellings and normally avoid the provision of single aspect dwellings. A single aspect dwelling should only be provided where it is considered a more appropriate design solution to meet the requirements of Part B in Policy D3 Optimising site capacity through the design-led approach than a dual aspect dwelling, and it can be demonstrated that it will have adequate passive ventilation, daylight and privacy, and avoid overheating.*

Policy D6 (D): *The design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing and maximising the usability of outside amenity space.*

Housing Supplementary Planning Guidance (March 2016) – Mayor of London

- 3.5 The Housing Supplementary Planning Guidance (SPG) provides guidance on the implementation of housing policies in the 2015 London Plan and the 2016 Minor Alterations to the Plan (MALP). Whilst this related to earlier versions of the London Plan, the SPG still remains relevant to the current London Plan 2021.

- 3.6 In terms Part 1: Supply, of the SPG, this provides guidance on the strategic approach to increasing housing supply set out in the London Plan policies and in particular, section 1.3 deals with 'Optimising Housing Potential' and relevant to daylight and sunlight paragraphs 1.3.45 and 1.3.46;

Standards for privacy, daylight and sunlight

Para. 1.3.45: *Policy 7.6Bd requires new development to avoid causing 'unacceptable harm' to the amenity of surrounding land and buildings, particularly in relation to privacy and overshadowing and where tall buildings are proposed. An appropriate degree of flexibility needs to be applied when using BRE guidelines (BRE, Site layout planning for daylight and sunlight: a guide to good practice) to assess the daylight and sunlight impacts of new development on surrounding properties, as well as within new developments themselves. Guidelines should be applied sensitively to higher density development, especially in opportunity areas, town centres, large sites and accessible locations, where BRE advice suggests considering the use of alternative targets. This should take into account local circumstances; the need to optimise housing capacity; and scope for the character and form of an area to change over time.*

Para. 1.3.46: *The degree of harm on adjacent properties and the daylight targets within a proposed scheme should be assessed drawing on broadly comparable residential typologies within the area and of a similar nature across London. Decision makers should recognise that fully optimising housing potential on large sites may necessitate standards which depart from those presently experienced but which still achieve satisfactory levels of residential amenity and avoid unacceptable harm.*

- 3.7 It is evident that like most local planning authorities, a detailed review of the effects of the proposal upon daylight and sunlight to neighbouring properties should be undertaken along with demonstration of the provision of daylight and sunlight within the proposal for the future occupants.

4.0 METHODOLOGY & INFORMATION UTILISED

Introduction

- 4.1 This review has been undertaken in reference to the Building Research Establishment's (BRE) 'Site Layout Planning for Daylight and Sunlight - A Guide to Good Practice' (3rd Ed / 2022) (The BRE Guide) which enables an objective assessment to be made on both as to whether the proposals will adversely affect the daylight and sunlight reaching neighbouring habitable rooms and provision of daylight and sunlight within a proposal.
- 4.2 The BRE Guide is the industry source reference for daylight and sunlight review although it is important to highlight that the BRE Guide is not a set of planning rules, which are either passed or failed; the numerical values are given and used, not as proscriptive or prescriptive values but as a way of comparing situations and coming to a judgement. The BRE Guide is a universal reference and does not differentiate the default target criteria between a rural or dense urban development environment and hence suitable flexibility and interpretation should be engaged for the given proposal under consideration. The BRE Guide highlights such a flexible approach within the introduction of the BRE Guide.

Daylight and sunlight provision within the proposal

- 4.3 We have undertaken analysis of the provision of daylight and sunlight within the proposal following the methodology set out in the BRE Guide on Site Layout Planning for Daylight and Sunlight (3rd Ed / 2022) and as further summarised below;

Daylight provision:

- 4.4 For self-test review of daylight within the proposal, habitable rooms are reviewed which are ordinarily living rooms, dining rooms, kitchens and bedrooms. Bathrooms, storage and circulation areas need not be analysed.
- 4.5 For student accommodation, we have considered the student studio rooms within the proposal and residents' main lounge / amenity area at ground floor applicable for assessment of daylight.
- 4.6 For analysis methodology, the main section applicable within the BRE Guide is '*Appendix C: Interior daylight recommendations*'. We examine the criteria and analysis input as follows;

- 4.7 This methodology can follow either the 'Illuminance method' which involves using climatic data for the location of the site to calculate the illuminance from daylight (within the room on the assessment grid / working plane at hourly intervals for a typical year) OR the 'Daylight Factor method' which utilises a CIE standard overcast sky and expresses the ratio as a percentage of a point on the assessment grid / working plane within the room, divided by the illuminance on an unobstructed horizontal surface outdoors.
- 4.8 The BRE Guide highlights the specific recommendations for daylight provision in UK dwellings derived from a UK National Annex which gives specific minimum illuminance recommendations for habitable rooms in dwellings in the United Kingdom. The minimum recommendations are stated in para. C16 of the BRE Guide as;
- 'C16: The UK National Annex gives illuminance recommendations of 100 lux in bedrooms, 150 lux in living rooms and 200 lux in kitchens. These are 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 recommended levels over 95% of a reference plane need not apply to dwellings in the UK.'*
- 4.9 We have followed the aforementioned target criteria though for student studio rooms which incorporate a multi-use including living/bedroom/kitchenette these are targeted on a predominant room use of 150 lux median illuminance i.e. 'living area' for at least 50% of the room area during half of the daylight hours. Whilst this differs to the default methodology within the BRE Guide, it is recognised within the BRE Guide that this is a reasonable approach if the kitchens are not treated as habitable spaces / an area within their own right, as it may avoid small separate kitchens in a design.
- 4.10 In terms of daylight analysis, we confirm below the inputting data utilised as follows (unless noted otherwise);
- Glass transmission: 0.68 for clear double-glazing with a low emissivity coating.
 - Maintenance Factor: 8%
 - Net area of glazing: we have utilised the surround opening less framework – framework allowance of 20%.
 - Room surface reflectance: 0.8 ceilings (white), 0.7 walls (white), 0.4 floor (light floor)
 - External surface reflectance: 0.2 surrounding buildings / massing, 0.2 ground.
- 4.11 For the assessment grid, this has been taken over the whole of the room, subject as per the methodology to the omission of any corridor or annexed entrance to a room or similar and also as per the BRE Guide, less 300mm to the perimeter of the room.

Sunlight within the proposal 'Sun Exposure':

- 4.12 There is no reference directly for sunlight provision to student accommodation.
- 4.13 The BRE Guide does refer to 'dwellings'; the main section applicable within the BRE Guide is '3. Sunlighting – 3.1 New Development.'
- 4.14 The methodology recommendations are primarily stated in para. 3.1.10 of the BRE Guide as;
- '3.1.10: For interiors, access to sunlight can be quantified. BS EN 17037 recommends that a space should receive a minimum of 1.5 hours of direct sunlight on a selected date between 1 February and 21 March with cloudless conditions. It is suggested that 21 March (equinox) be used. The medium level of recommendation is three hours and the high level of recommendation four hours. For dwellings, at least one habitable room, preferably a main living room, should meet at least the minimum criterion...'*
- 4.15 In terms of inputting data for review, to confirm we have selected the 21st March (equinox) review date as suggested by the BRE Guide.
- 4.16 However, given the student use (as opposed to residential 'dwellings'), it is reasonable to consider provision to the residents' main lounge / amenity area only and not for each student studio room. As background, in reference to the BRE Guide, whilst every habitable room within a 'dwelling' is to be analysed, the intention is for at least one room within each dwelling (preferably living room) to achieve target where reasonably possible within a multi-unit development – it is therefore, unrealistic for every 'studio room' to be gauged to a sunlight target within student accommodation. Accordingly, the more conventional approach of the industry has been to adopt a review of communal key rooms approach only e.g. communal living rooms, for student accommodation.

Information Utilised

- 4.17 A 2D measured site survey and Proposed drawings prepared by Benchmark Architects; Drawings: 105-02-02-(100-106) have been supplemented with Ordnance survey; Aerial & 3D imagery from Google Earth and source data within the public realm has been considered to develop a 3D computer model of the Proposed building and its surrounding context.

5.0 DAYLIGHT PROVISION WITHIN THE PROPOSAL

Daylight self-test – habitable rooms.

- 5.1 Daylight review has been analysed at ground floor and 1st floor and given the commonality of the floor layouts and results, extrapolated for the subsequent floors above; this is considered an acceptable approach in reference to the BRE Guide.
- 5.2 We have utilised the 'Illuminance method' for review and the output of analysis is presented within **Table 1 – Self-test – Daylight SDA** (Spatial Daylight Autonomy) and visually presented for ground and 1st floor within respective **Drawing Nos. 900 & 901** within **Appendix 1**.
- 5.3 From **Table 1**, we have summarised the output of analysis with appropriate extrapolation for 2nd, 3rd & 4th floors which follow a similar floor arrangement (for which windows have subsequently less obstruction) within **Summary Table D1** as follows;

Summary Table D1 – Self-test – Provision of Daylight within the development (habitable rooms)

Floor Reference	No. of habitable rooms reviewed for daylight	No. of Habitable Rooms	
		Meeting Target*	Not Meeting Target*
Ground	14 (including communal lounge)	14 (100%)	0
First	20	20 (100%)	0
Second*	18	18 (100%)	0
Third*	15	15 (100%)	0
Fourth*	7	7 (100%)	0
Total*	74	74 (100%)	0

**results for upper floors extrapolated based on the understanding that light availability becomes more abundant at higher levels.*

- 5.4 From **Summary Table D1**, this confirms that 100% of all habitable rooms comprising 73 No. student studio rooms and 1 No. residents lounge are expected to meet the target illuminance levels for daylight provision (on the basis that student studio rooms which incorporate a multi-use including living/bedroom/kitchenette are targeted on a predominant room use of 150 lux median illuminance i.e. 'living area' for at least 50% of the room area during half of the daylight hours).

6.0 SUNLIGHT PROVISION WITHIN THE PROPOSAL

- 6.1 There is no reference directly for sunlight provision to student accommodation (as opposed to residential 'dwellings') within the BRE Guide.
- 6.2 However, it is considered appropriate to review sunlight to key communal rooms namely, the residents' main lounge / amenity area at ground floor which has been analysed and the results presented within **Table 2 – Self-test – Sunlight Exposure to Communal Lounge** as follows;

Table 2 – Self-test – Sunlight Exposure – Communal Lounge

Floor / room ref.	Window ref.	Window orientation	Sunlight Exposure Hours (21 st March)	BRE Guide Rating
Ground floor communal lounge – room ref. R5	W5	222°	5.1	High
	W6	222°	5.3	High
Overall room rating			5.3	High

- 6.3 From **Table 2**, this confirms that sunlight provision to the residents' main lounge / amenity area (located at ground floor) readily receives suitable sunlight provision (above the minimum standard considered to a residential dwelling living room).

7.0 CONCLUSION

- 7.1 We conclude that for this iteration, the provision of daylight and sunlight within the proposal is considered suitable and meets reasonable targeting criteria in reference to the BRE Guide and industry consideration and on that basis, should also be considered acceptable.

APPENDICES

Appendix 1 – Daylight Analysis - provision within the proposal:

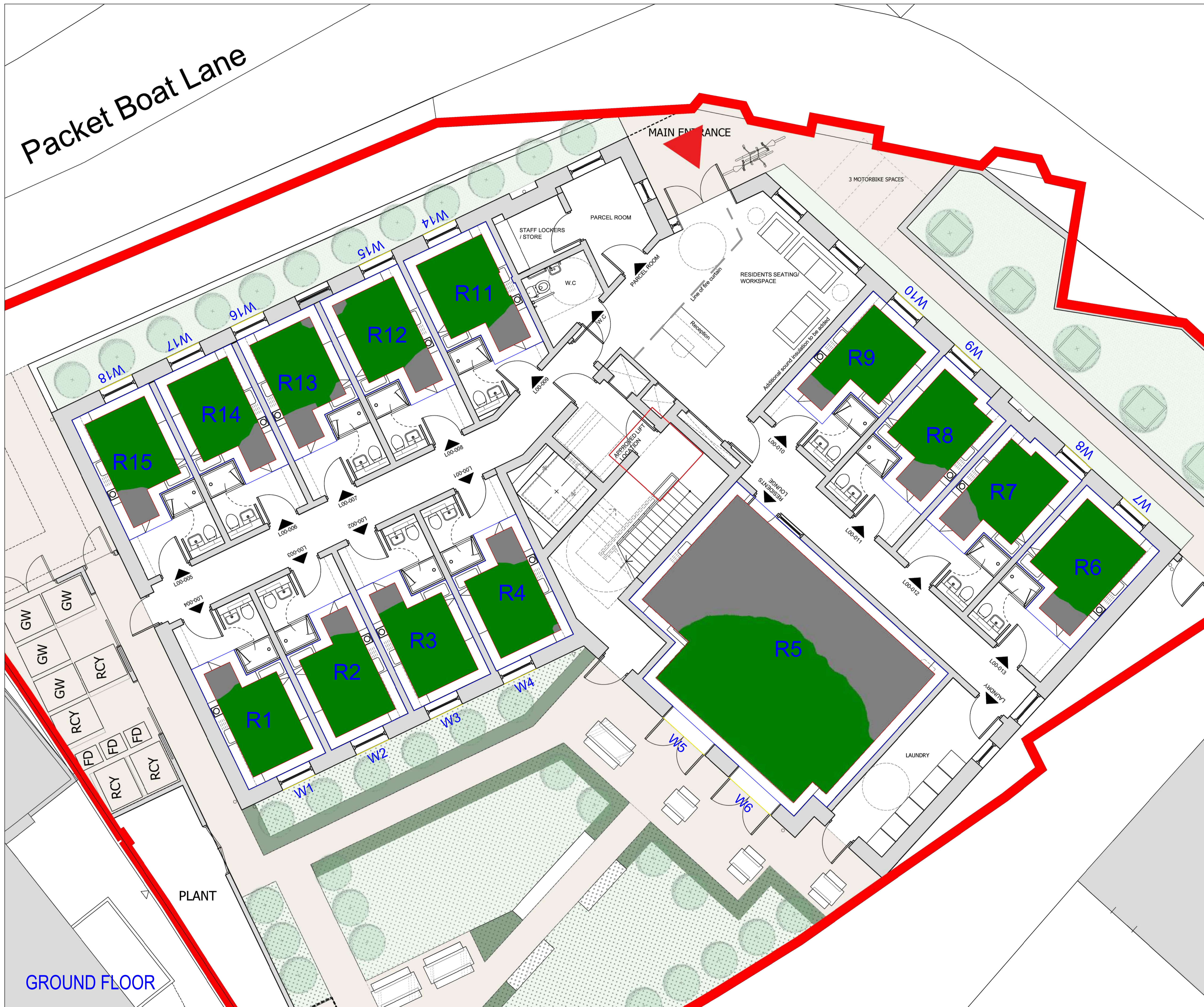
Table 1 Self-test – Daylight SDA

Drawing Nos. 900 & 901 Self-test – Daylight SDA plots (Ground and First Floor)

Table 1 - Self Test - Daylight - SDA

Floor Ref	Room Ref	Room Use	Room Area m2	Effective Area	Req Lux	Area Meeting Req Lux	% of Area Meeting Req Lux	Meets Criteria
Ground	R1	Studio	10.29	6.50	150	5.78	89%	YES
	R2	Studio	10.29	6.50	150	5.87	90%	YES
	R3	Studio	10.30	6.51	150	5.97	92%	YES
	R4	Studio	10.30	6.51	150	5.42	83%	YES
	R5	Communal Living Room	56.38	47.33	150	24.35	51%	YES
	R6	Studio	12.01	7.98	150	7.13	89%	YES
	R7	Studio	10.76	6.88	150	5.69	83%	YES
	R8	Studio	10.76	6.87	150	5.69	83%	YES
	R9	Studio	10.27	6.41	150	5.81	91%	YES
	R11	Studio	10.95	7.02	150	5.93	85%	YES
	R12	Studio	10.52	6.69	150	5.58	83%	YES
	R13	Studio	10.31	6.51	150	5.07	78%	YES
	R14	Studio	10.31	6.51	150	5.61	86%	YES
	R15	Studio	10.30	6.50	150	5.51	85%	YES
	First	R1	Studio	10.29	6.50	150	6.23	96%
R2		Studio	10.29	6.50	150	6.32	97%	YES
R3		Studio	10.30	6.51	150	6.33	97%	YES
R4		Studio	10.30	6.51	150	5.87	90%	YES
R5		Studio	10.58	6.73	150	5.61	83%	YES
R6		Studio	10.58	6.73	150	6.17	92%	YES
R7		Studio	10.57	6.72	150	5.97	89%	YES
R8		Studio	10.57	6.72	150	6.44	96%	YES
R9		Studio	12.01	7.98	150	7.51	94%	YES
R10		Studio	10.76	6.88	150	6.11	89%	YES
R11		Studio	10.76	6.87	150	6.11	89%	YES
R12		Studio	10.27	6.41	150	6.31	98%	YES
R13		Studio	10.26	6.40	150	6.10	95%	YES
R14		Studio	10.26	6.40	150	5.60	88%	YES
R15		Studio	15.52	10.01	150	6.42	64%	YES
R16		Studio	10.95	7.02	150	6.35	90%	YES
R17		Studio	10.52	6.69	150	6.04	90%	YES
R18		Studio	10.31	6.51	150	5.97	92%	YES
R19		Studio	10.31	6.51	150	5.88	90%	YES
R20		Studio	10.30	6.50	150	5.78	89%	YES

Packet Boat Lane



REV.	NOTES	DWN	DATE

Key:

- ANALYSED ROOM AREA
- AREA MEETING TARGET
- AREA BELOW TARGET

Notes:

DRAWN	
CHECKED	

SCALE
NTS (A3 Sheet)

Paddington Packet Boat

Self-test Daylight SDA
Ground Floor Layout

Job No	Rev	Drawing Number
2001E	-	2001E-900
Date : 02.04.2026		

GROUND FLOOR

Packet Boat Lane



FIRST FLOOR

REV.	NOTES	DWN	DATE

Key:

	ANALYSED ROOM AREA
	AREA MEETING TARGET
	AREA BELOW TARGET

Notes:



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DRAWN	
CHECKED	

SCALE
 NTS (A3 Sheet)

Paddington Packet Boat

Self-test Daylight SDA
 First Floor Layout

Job No	Rev	Drawing Number
2001E	-	2001E-901
Date : 02.04.2026		