

SALAMANDER QUAY HAREFIELD UXBRIDGE UB9 6NZ **ADEQUATE NATURAL LIGHT**

INTRODUCTION

This Report has been commissioned to accompany the planning application to convert and adapt this existing building with a lawful office use (Class E of the UCO) to form Class E (one office suite per floor) and also 34 residential apartments. The scheme proposals comprise the conversion of the existing building to provide 34nr self-contained as well as the alterations some new fenestration and balconies 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

National Planning Policy Framework ('NPPF')

The revised National Planning Policy Framework ('NPPF') 2023 addresses the need for the flexible application of guidance relating to daylight and sunlight under Section 11 'Making effective use of land'. Paragraph 125(c) under subsection "Achieving appropriate densities" states the following;

- 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).

BS EN 17037

The British Standard "Daylight in buildings" (BS EN 17037) contains advice and guidance on interior daylighting. The guidance contained BR 209 (2022) is intended to be used with BS EN 17037 and its UK National Annex.

BR209 (2022)

Following the publication of the information paper entitled "*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 in accordance with the criteria set by this publication and which is generally taken to be the accepted basis for such assessment and adopted by most Planning Authorities. This publication was superseded by the *Second Edition* issued *October 2011* which itself has been superseded by BR209 (2022) which is the guidance against which the proposed development was assessed.

'Specific recommendations for daylight provision in UK dwellings

C15 A UK National Annex gives specific minimum recommendations for habitable rooms in dwellings in the United Kingdom. These are intended for 'hard to light' dwellings, for example in basements or with significant external obstructions or with tall trees outside, or for existing buildings being refurbished or converted into dwellings. The National Annex therefore provides the UK guidance on minimum daylight provision in all UK dwellings.

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 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 recommended levels over 95% of a reference plane need not apply to dwellings in the UK.

C17 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. The kitchen space would still need to be included in the assessment area (Figures C4 and C5). Alternatively, in rooms with a particular requirement for daylight, such as bed sitting rooms in homes for the elderly, higher values such as those in tables C1 and C2 may be taken.'

Adequate Daylight

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.

Adequate Sunlight

With regard to sunlight, BR209 (2022) provides the following advice:

3.1.15 In general a dwelling, or non-domestic building that has a particular requirement for sunlight, will appear reasonably sunlit provided:

- 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.

3.1.16 Where groups of dwellings are planned, site layout design should aim to maximise the number of dwellings with a main living room that meets the above recommendations.

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 living room. The analysis has been undertaken with reflectance values of 0.80 for walls and ceilings, with 0.40 for the floors.

Adequate Daylight

								Criteria		
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
1										
Ground	R1	LKD	30.49	22.83	368	19.93	87%	200	50%	YES
	R2	Bedroom	10.61	6.34	230	6.06	96%	100	50%	YES
2										
Ground	R1	LKD	26.54	19.53	466	17.59	90%	200	50%	YES
	R2	Bedroom	13.94	9.44	465	9.44	100%	100	50%	YES
	R3	Bedroom	10.88	6.98	225	6.98	100%	100	50%	YES
3										
Ground	R1	Living Room	17.61	12.43	150	6.26	50%	150	50%	YES
	R2	Bedroom	13.91	9.65	159	9.65	100%	100	50%	YES
4										
Ground	R1	LKD	30.55	24.27	719	24.27	100%	200	50%	YES
	R2	Bedroom	10.03	6.54	387	6.54	100%	100	50%	YES
	R3	Bedroom	12.07	8.18	308	8.18	100%	100	50%	YES
5										
Ground	R1	Living Room	25.44	19.45	152	10.00	51%	200	50%	YES
	R2	Bedroom	17.67	12.97	569	12.97	100%	100	50%	YES

6										
Ground	R1	Living Room	24.93	18.38	156	9.49	52%	150	50%	YES
	R2	Bedroom	15.26	10.92	749	10.92	100%	100	50%	YES
7										
Ground	R1	LKD	19.07	13.94	324	12.46	89%	200	50%	YES
	R2	Bedroom	12.15	8.22	221	8.22	100%	100	50%	YES
8										
Ground	R1	LKD	21.07	15.13	1012	15.13	100%	200	50%	YES
	R2	Bedroom	14.47	9.88	158	9.69	98%	100	50%	YES
9										
Ground	R1	LKD	36.94	28.72	285	20.01	70%	200	50%	YES
	R2	Bedroom	12.63	8.54	279	8.54	100%	100	50%	YES
	R3	Bedroom	13.27	9.09	275	9.09	100%	100	50%	YES
10										
Ground	R1	LKD	26.44	20.15	267	12.25	61%	200	50%	YES
	R2	Bedroom	11.39	7.56	103	4.11	54%	100	50%	YES
	R3	Bedroom	7.21	4.25	155	4.25	100%	100	50%	YES
11										
Ground	R1	Living Room	24.19	17.95	196	12.29	68%	150	50%	YES
	R2	Bedroom	15.24	10.88	551	10.88	100%	100	50%	YES
12										
Ground	R1	Living Room	23.89	17.69	153	9.21	52%	150	50%	YES
	R2	Bedroom	15.40	11.02	528	11.02	100%	100	50%	YES
13										
Ground	R1	Studio	29.78	21.96	289	15.08	69%	200	50%	YES
14										
Ground	R1	LKD	25.86	18.89	506	17.65	93%	200	50%	YES
	R2	Bedroom	11.98	8.11	212	8.11	100%	100	50%	YES
15										
Ground	R1	Living Room	16.79	12.08	112	3.97	33%	150	50%	NO
	R2	Bedroom	14.97	10.00	142	7.28	73%	100	50%	YES
	R3	Bedroom	12.85	8.26	150	6.35	77%	100	50%	YES
16										
Ground	R1	LKD	29.70	23.04	586	23.04	100%	200	50%	YES
	R2	Bedroom	13.37	9.02	115	5.23	58%	100	50%	YES
17										
Ground	R1	LKD	27.51	21.21	789	21.21	100%	200	50%	YES
	R2	Bedroom	12.35	8.47	153	7.96	94%	100	50%	YES

18										
First	R1	LKD	28.92	22.10	1088	22.10	100%	200	50%	YES
	R2	Bedroom	18.48	13.52	220	13.52	100%	100	50%	YES
19										
First	R1	LKD	25.21	19.47	1041	19.47	100%	200	50%	YES
	R2	Bedroom	12.83	8.83	356	8.83	100%	100	50%	YES
	R3	Bedroom	7.07	4.08	438	4.08	100%	100	50%	YES
20										
First	R1	LKD	19.23	13.92	361	12.79	92%	200	50%	YES
	R2	Bedroom	12.63	8.58	340	8.58	100%	100	50%	YES
21										
First	R1	LKD	27.99	21.87	709	21.87	100%	200	50%	YES
	R2	Bedroom	12.64	8.67	453	8.67	100%	100	50%	YES
	R3	Bedroom	7.65	4.56	564	4.56	100%	100	50%	YES
22										
First	R1	LKD	31.57	25.17	490	25.17	100%	200	50%	YES
	R3	Bedroom	11.00	7.27	505	7.27	100%	100	50%	YES
23										
First	R1	LKD	24.97	18.46	532	16.87	91%	200	50%	YES
	R2	Bedroom	18.13	13.06	325	13.06	100%	100	50%	YES
24										
First	R1	LKD	28.07	21.35	1182	21.35	100%	200	50%	YES
	R2	Bedroom	14.18	9.82	192	9.82	100%	100	50%	YES
	R3	Bedroom	13.54	9.33	273	9.33	100%	100	50%	YES
25										
First	R1	LKD	19.57	14.01	584	13.36	95%	200	50%	YES
	R2	Bedroom	9.85	5.84	167	5.08	87%	100	50%	YES
26										
First	R1	LKD	30.83	24.24	355	23.21	96%	200	50%	YES
	R2	Bedroom	14.11	9.57	579	9.57	100%	100	50%	YES
27										
First	R1	LKD	29.75	22.72	425	21.02	93%	200	50%	YES
	R2	Bedroom	11.83	7.71	589	7.71	100%	100	50%	YES
28										
First	R1	LKD	25.14	18.83	383	15.08	80%	200	50%	YES
	R2	Bedroom	11.63	7.57	516	7.57	100%	100	50%	YES
	R3	Bedroom	8.57	4.81	418	4.81	100%	100	50%	YES
29										
First	R1	LKD	23.32	16.69	564	16.12	97%	200	50%	YES
	R2	Bedroom	10.57	6.91	314	6.91	100%	100	50%	YES

30										
First	R1	LKD	26.76	20.22	562	18.66	92%	200	50%	YES
	R2	Bedroom	15.37	10.81	365	10.81	100%	100	50%	YES
31										
First	R1	LKD	30.41	24.24	1104	24.24	100%	200	50%	YES
	R2	Bedroom	11.91	7.73	480	7.73	100%	100	50%	YES
32										
First	R1	Living Room	16.77	12.07	254	10.45	87%	150	50%	YES
	R2	Bedroom	14.93	9.97	205	9.42	95%	100	50%	YES
	R3	Bedroom	12.84	8.25	346	8.25	100%	100	50%	YES
33										
First	R1	LKD	27.47	21.17	989	21.17	100%	200	50%	YES
	R2	Bedroom	13.55	9.17	143	6.33	69%	100	50%	YES
34										
First	R1	LKD	25.55	18.87	1452	18.87	100%	200	50%	YES
	R2	Bedroom	11.44	7.74	794	7.74	100%	100	50%	YES

In summary, the analysis results show that adequate levels of daylight amenity would be received within the proposed habitable rooms.

Adequate Sunlight

Floor Ref	Room Ref	Room Use	Window Ref	Window Orientation	Proposed Sunlight Exposure (Hours)	Rating
1						
Ground	R1	LKD	W2	293°N	0	
			W3	293°N	0	
			W4	293°N	0.3	
			W5	23°N	0	
					0.3	
Ground	R1	LKD	W2	293°N	0	
			W3	293°N	0	
			W4	293°N	0.3	
			W5	23°N	0	
					0.3	
Ground	R2	Bedroom	W5	23°N	0	
					0	
2						
Ground	R1	LKD	W8	113°	4.3	
			W7	23°N	0	
					4.3	High

Ground	R2	Bedroom	W9	113°	4.4	
					4.4	High
Ground	R3	Bedroom	W6	23°N	0	
					0	
3						
Ground	R1	Living Room	W11	113°	0.8	
					0.8	
Ground	R2	Bedroom	W10	113°	0.9	
					0.9	
4						
Ground	R1	LKD	W13	203°	6	
			W12	113°	1.3	
					6.8	High
Ground	R2	Bedroom	W15	203°	7.2	
					7.2	High
Ground	R3	Bedroom	W14	203°	6.3	
					6.3	High
6						
Ground	R1	LKD	W52	23°N	0	
					0	
Ground	R2	Bedroom	W16	203°	7.3	
					7.3	High
7						
Ground	R1	LKD	W51	23°N	0	
					0	
Ground	R1	LKD	W51	23°N	0	
					0	
Ground	R2	Bedroom	W18	203°	7	
					7	High
Ground	R3	Bedroom	W17	203°	5.2	
					5.2	High
8						
Ground	R1	LKD	W20	203°	6	
					6	High
Ground	R2	Bedroom	W19	203°	4.1	
					4.1	High
9						
Ground	R1	LKD	W21	203°	6.7	
			W22	203°	6.5	
			W24	293°N	1.7	
			W23	293°N	3.5	
					7.1	High

Ground	R2	Bedroom	W25	293°N	1.1	
					1.1	
10						
Ground	R1	LKD	W28	293°N	1.8	
					1.8	Minimum
Ground	R2	Bedroom	W26	293°N	1.3	
					1.3	
Ground	R3	Bedroom	W27	293°N	2.1	
					2.1	Minimum
11						
Ground	R1	LKD	W47	113°	3.6	
			W46	113°	3.9	
			W48	113°	3.1	
					3.9	Medium
Ground	R2	Bedroom	W50	113°	2.8	
					2.8	Minimum
Ground	R3	Bedroom	W49	113°	2.9	
					2.9	Minimum
12						
Ground	R1	LKD	W45	113°	3.9	
					3.9	Medium
Ground	R1	Living Room	W45	113°	3.9	
					3.9	Medium
Ground	R2	Bedroom	W29	293°N	1.8	
					1.8	Minimum
13						
Ground	R1	Living Room	W44	113°	3.9	
					3.9	Medium
Ground	R2	Bedroom	W30	293°N	1.8	
					1.8	Minimum
14						
Ground	R1	Studio	W31	293°N	1.8	
					1.8	Minimum
15						
Ground	R1	LKD	W33	23°N	0	
			W32	293°N	2.3	
					2.3	Minimum
Ground	R2	Bedroom	W34	23°N	0	
					0	
16						
Ground	R1	Living Room	W37	23°N	0	
					0	

Ground	R2	Bedroom	W35	23°N	0	
					0	
Ground	R3	Bedroom	W36	23°N	0	
					0	
17						
Ground	R1	LKD	W39	23°N	0	
			W40	113°	4.4	
					4.4	High
Ground	R2	Bedroom	W38	23°N	0	
					0	
18						
Ground	R1	LKD	W41	113°	3.6	
			W42	203°	6.1	
					8.1	High
Ground	R2	Bedroom	W43	203°	3.2	
					3.2	Medium
19						
First	R1	LKD	W3	23°N	0	
			W2	293°N	1.6	
					1.6	Minimum
First	R2	Bedroom	W1	293°N	0	
					0	
20						
First	R1	LKD	W7	67°N	2.3	
			W8	113°	2.5	
			W6	67°N	1.4	
			W4	23°N	0.3	
			W5	61°N	0	
					2.5	Minimum
First	R2	Bedroom	W11	112°	2.5	
					2.5	Minimum
First	R3	Bedroom	W10	110°	2.5	
			W9	111°	2.4	
					2.5	Minimum
21						
First	R1	LKD	W75	113°	2.6	
					2.6	Minimum
First	R2	Bedroom	W12	113°	2.6	
					2.6	Minimum

22						
First	R1	LKD	W18	203°	3.3	
			W17	156°	2.1	
			W14	113°	0	
			W16	157°	0.2	
			W15	157°	0.2	
					3.6	Medium
First	R2	Bedroom	W21	203°	3.4	
					3.4	Medium
First	R3	Bedroom	W20	201°	3.3	
			W19	205°	3.3	
					3.3	Medium
23						
First	R1	LKD	W24	203°	3.7	
					3.7	Medium
First	R2	Bedroom	W22	203°	3.5	
					3.5	Medium
First	R3	Bedroom	W23	203°	3.5	
					3.5	Medium
24						
First	R1	LKD	W29	293°N	2.5	
			W28	293°N	3.5	
			W27	203°	7.5	
			W26	203°	7	
					7.5	High
First	R2	Bedroom	W30	293°N	1.2	
					1.2	
First	R3	Bedroom	W25	203°	5.3	
					5.3	High
25						
First	R1	LKD	W70	113°	3.4	
			W68	23°N	0.6	
			W69	113°	4.7	
			W67	23°N	0	
			W66	23°N	0	
					4.7	High
First	R2	Bedroom	W71	113°	0.1	
					0.1	
26						
First	R1	LKD	W33	293°N	1.6	
			W32	295°N	1.1	
					1.6	Minimum

First	R2	Bedroom	W31	293°N	1.6	
					1.6	Minimum
27						
First	R1	LKD	W65	113°	2.2	
			W64	113°	2.4	
			W63	112°	2.4	
					2.4	Minimum
First	R2	Bedroom	W62	113°	2.4	
					2.4	Minimum
28						
First	R1	LKD	W39	293°N	0	
			W38	293°N	1.7	
			W37	292°N	1.6	
					1.7	Minimum
First	R2	Bedroom	W36	293°N	1.7	
					1.7	Minimum
First	R3	Bedroom	W35	290°N	1.4	
			W34	294°N	1.3	
					1.4	
29						
First	R1	LKD	W61	113°	2.4	
					2.4	Minimum
First	R2	Bedroom	W60	113°	2.4	
					2.4	Minimum
30						
First	R1	LKD	W41	292°N	1.7	
			W40	293°N	1.7	
					1.7	Minimum
First	R2	Bedroom	W42	293°N	1.7	
					1.7	Minimum
31						
First	R1	LKD	W44	293°N	1.8	
			W46	23°N	0	
			W45	337°N	0.6	
					1.8	Minimum
First	R2	Bedroom	W43	293°N	1.8	
					1.8	Minimum
32						
First	R1	Living Room	W49	23°N	0	
					0	
First	R2	Bedroom	W47	23°N	0	
					0	

First	R3	Bedroom	W48	23°N	0	
					0	
33						
First	R1	LKD	W53	113°	2.1	
			W51	23°N	0.2	
			W52	68°N	1.3	
					2.1	Minimum
First	R2	Bedroom	W50	23°N	0	
					0	
34						
First	R1	LKD	W54	113°	2.2	
			W56	113°	2.3	
			W57	202°	4.4	
			W55	112°	2.2	
					6.7	High
First	R2	Bedroom	W58	204°	4.2	
			W59	203°	3.7	
					4.2	High

In summary, the analysis reveals that 30 out of 34 flats (88%) contain one or more habitable rooms that receive at least the minimum level of sunlight exposure.

CONCLUSION

The technical analysis, as detailed within BR209 (2022), demonstrates that the proposals comply with guidance in respect of daylight provision. With regard to sunlight, paragraph 3.1.16 of BR209 (2022) states, 'Where groups of dwellings are planned, site layout design should aim to maximise the number of dwellings with a main living room that meets the above recommendations.' Again, the technical analysis demonstrates that the guidance has been met.

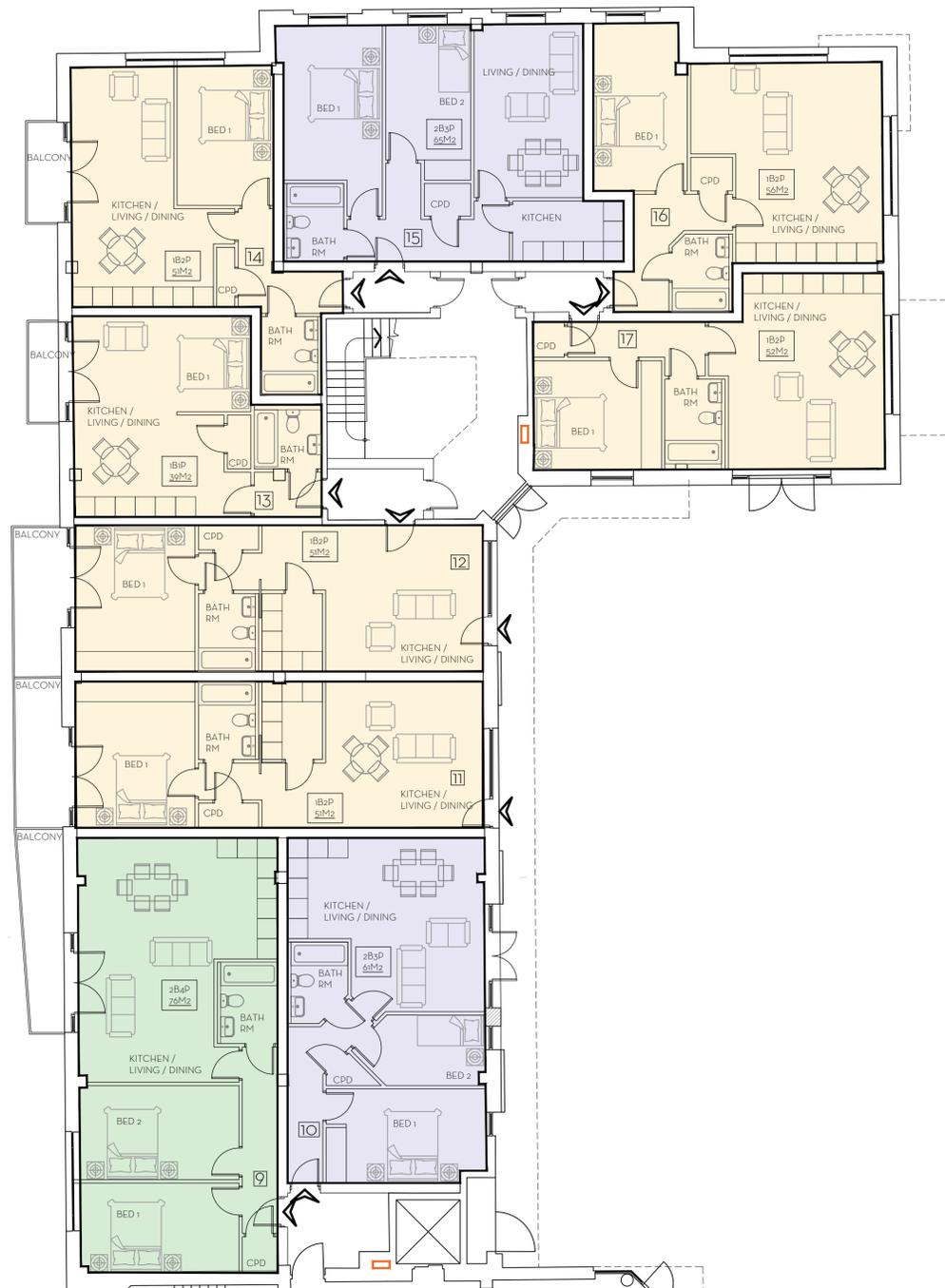
It is therefore my Expert opinion that the requirement for adequate daylight and sunlight, as prescribed in BR209 (2022), has been met.

November 11, 2025

R W STAIG BSC MRICS

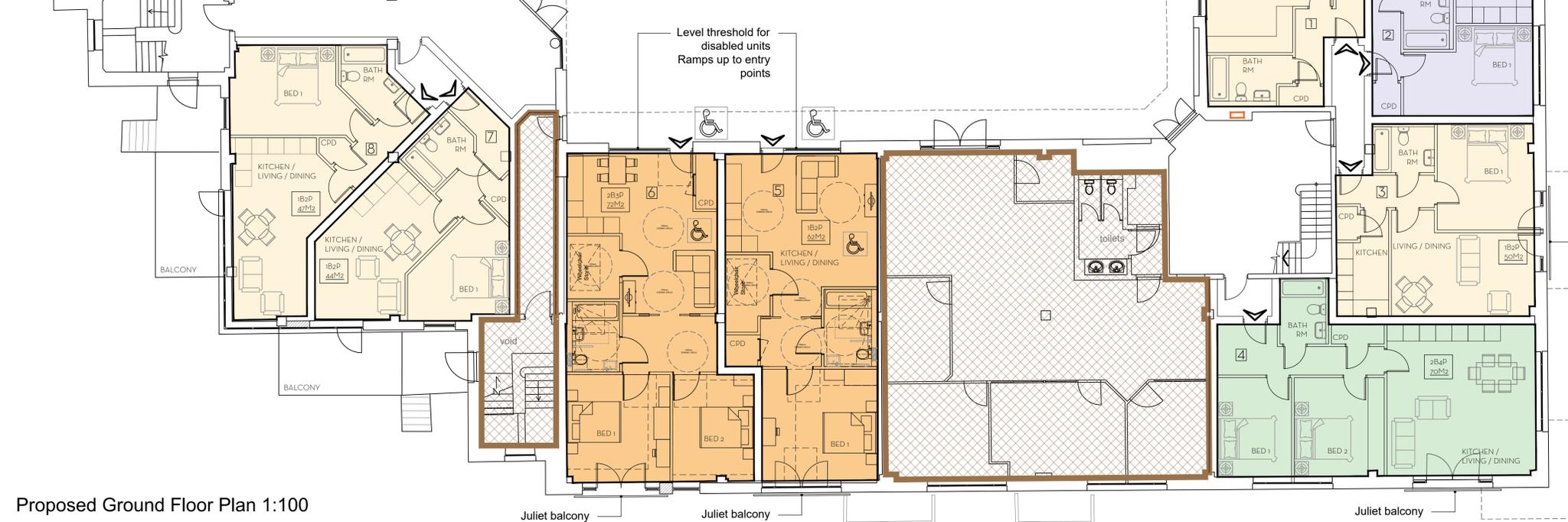
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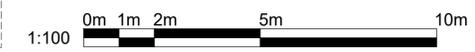


	1B2P	2B3P	2B4P	total
GROUND	11	3	3	17
FIRST	11	4	2	17
total	21	9	4	34

 Retained offices



Proposed Ground Floor Plan 1:100



Notes:
 do not scale:
 detailed drawings and larger scale drawings take precedence. Figured dimensions only are to be taken from this drawing.
 dimensions:
 All building and site dimensions, levels and sewer invert levels at connection points are to be checked and verified on site by the contractor before the commencement of works. All dimensions are to be checked prior to the placement of orders for materials or the fabrication of work and any discrepancy, omission or error is to be reported to the Architect immediately for verification.
 specification:
 The Contractor is to comply with current Building Legislation, British Standard Specifications, Building Regulations etc. whether or not specifically stated on this drawing. This drawing must be checked against and read in conjunction with any structural or other relevant specialist and design documentation provided.

revisions:

client:
 H Schneck
project:
 Salamander Quay
 Harefield
 Uxbridge
 UB9 6NZ
description:
 Proposed ground floor plan



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: 01653 245020
 e-mail: info@jdwarchitects.co.uk
 www: www.jdwarchitects.co.uk

drawn: jw **scale:** 1:100 **@A1**
date: Dec '24 **sheet** of:
job drwg. no.: jw1216-110 **rev:** C

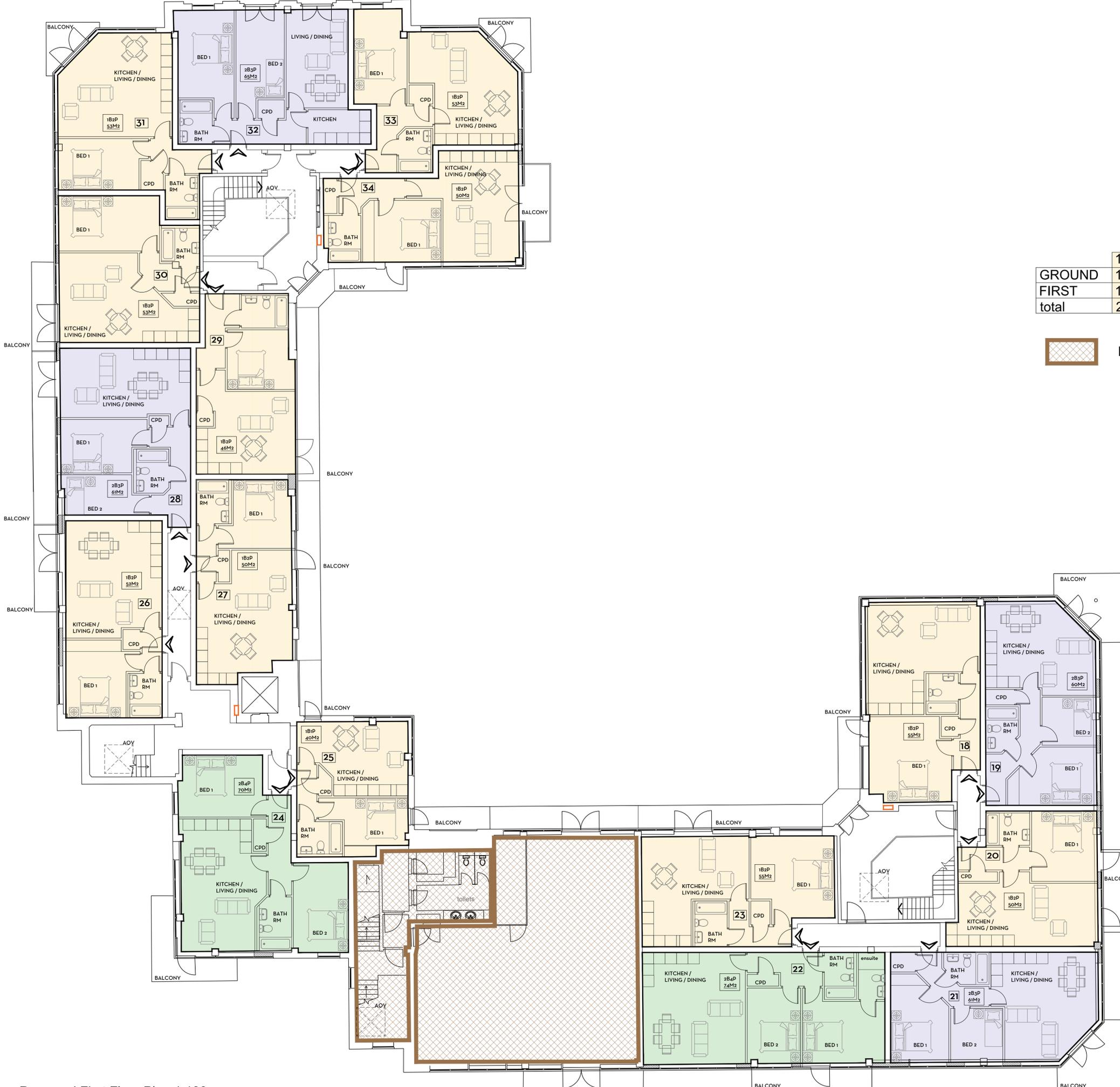
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Notes:

do not scale:
detailed drawings and larger scale drawings take precedence. Figured dimensions only are to be taken from this drawing.

dimensions:
All building and site dimensions, levels and sewer invert levels at connection points are to be checked and verified on site by the contractor before the commencement of works. All dimensions are to be checked prior to the placement of orders for materials or the fabrication of work and any discrepancy, omission or error is to be reported to the Architect immediately for verification.

specification:
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	1B2P	2B3P	2B4P	total
GROUND	11	3	3	17
FIRST	11	4	2	17
total	21	9	4	34



Retained offices

revisions:

client:
H Schneck

project:
Salamander Quay
Harefield
Uxbridge
UB9 6NZ

description:
Proposed first floor plan



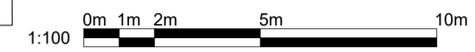
head office:
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drawn: jw scale: 1:100 @A1
date: Dec '24 sheet of:
job drwg. no: jw1216-111 rev: B

Proposed First Floor Plan 1:100



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