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RMA DAYLIGHT & SUNLIGHT REPORT

Hayes Town Centre

Hayes

18 February 2026

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Report details

Client:	Higgins Partnership 1961 PLC
Date of issue:	February 2026

1 Introduction

1.1.1 This daylight & sunlight report has been prepared by eb7 on behalf of the London Borough of Hillingdon ('LBH') in support of a reserved matters application for Phases 2 & 3 of the Hayes Town Centre Estate Regeneration, pursuant to Condition 1 of the hybrid permission for the site. A Section 73 application (application ref: 76550/APP/2025/2864) is currently pending and will be determined prior to the approval of this Reserved Matters Application which forms the baseline of this report. Therefore, this RMA responds to the revised wording of the planning conditions proposed within the Section 73 application.

1.1.2 eb7 were previously instructed to provide daylight consultancy advice in support of the proposed redevelopment of the Hayes Town Centre Estate in Hayes. These assessments considered the PRP Architects scheme proposals and were submitted in support of the consented hybrid planning application 76550/APP/2021/4499, comprising of the following:

> *OUTLINE permission (with all matters reserved) for residential floorspace (Class C3) including demolition of all existing buildings and structures; erection of new buildings; provision of a community centre (up to 140sq.m of Use Class F2(b) floorspace); new pedestrian and vehicular access; associated amenity space, open space, landscaping; car and cycle parking spaces; plant, refuse storage, servicing area and other works incidental to the proposed development; and FULL planning permission for Blocks A and B comprising 80 residential units (Class C3); new pedestrian and vehicular access; associated amenity space and landscaping; car and cycle parking; refuse storage, servicing area, and other associated infrastructure to include temporary highways and landscaping works).*

1.1.3 A Section 73 application was submitted in November 2025 seeks to revise specific conditions of the original planning consent (reference 76550/APP/2021/4499), including but not limited to conditions 3 (approved plans), 4 (approved documents), 5 (land use/quantum), 6 (housing mix), 7 (phasing plan), 9 (density), and 10 (building heights).

1.1.4 This detailed reserved matters application relates to Phases 2 & 3 only includes the layouts of the proposed accommodation including detailed proposed scheme massing and elevations in relation to the revised parameters and conditions as set out in the above S73 application and is described as follows:

> *Submission of Reserved Matters Application (Access, Appearance, Landscaping, Layout and Scale) pursuant to Condition 1 of Application ref: 76550/APP/2025/2864 (Outline permission (with all matters reserved) for residential floorspace (Class C3) including demolition of all existing buildings and structures; erection of new buildings; provision of a community centre (Use Class F2(b) floorspace); new pedestrian and vehicular access; associated amenity space, open space, landscaping; car and cycle parking spaces; plant, refuse*

storage, servicing area and other works incidental to the proposed development) for the erection of dwellings and community floorspace with associated landscaping and amenity space, parking, access and associated works.

1.1.5 Accordingly, this report considers the daylight, and sunlight impacts to the neighbouring residential properties, benchmarking these against the S73 application which will supersede the extant consent. As with the S73 application the impacts to the neighbouring properties consider the impacts of the cumulative development including all phases in order to illustrate effectively the 'worst case' scenario'. As well as the neighbouring impacts the report details the sunlight and overshadowing within phases 2 & 3 and the surrounding amenity space and internal daylight and sunlight levels to the proposed accommodation.

1.1.6 The methodology and criteria used for these assessments is provided by Building Research Establishment's (BRE) guidance 'Site layout planning for daylight and sunlight: A guide to good practice' (BRE 209 2nd edition, 2022). In both scenarios, we have compared the impacts of the proposals on the neighbouring residential properties against the consented scheme(s) in accordance with Appendix F of the BRE guidelines.

1.1.7 In order to carry out an assessment, we have updated the original 3D computer model (Test Environment) of the existing site, the surrounding properties and the proposed scheme.

1.1.8 The numerical criteria suggested within the BRE guidelines has been applied to the assessment mentioned above. It is important to note that these guidelines are not a rigid set of rules but are advisory and need to be applied flexibly according to the specific context of a site.

2 Guidance

2.1 Daylight & sunlight for planning

'Site layout planning for daylight and sunlight: A guide to good practice', BRE 2022

2.1.1 The Building Research Establishment (BRE) Report 209, *'Site layout planning for daylight and sunlight: A guide to good practice'*, is the reference document used by most local authorities for assessing daylight and sunlight in relation to new developments. Commonly referred to as 'the BRE guidelines', it provides various testing methodologies to calculate the potential light levels provided within proposed new development.

2.1.2 The guidance given within the BRE document makes direct reference to the British Standard BS EN17037 (2018) and the CIBSE (Chartered Institute of Building Services Engineers) guide LG10: Daylighting – a guide for designers (2014). It is intended to be used in conjunction with these documents, which provide guidance on the assessment of daylight and sunlight within new buildings.

2.2 Detailed daylight assessments (neighbouring properties)

2.2.1 The guidance outlines detailed methods for calculating daylight to neighbours - the Vertical Sky Component (VSC) and the No-Skyline (NSL).

2.2.2 The VSC test measures the amount of sky that is visible to a specific point on the outside of a property, which is directly related to the amount of daylight that can be received. It is measured on the outside face of the external walls, usually at the centre point of a window.

2.2.3 The NSL test calculates the distribution of daylight within rooms by determining the area of the room at desk / work surface height (the 'working plane') which can and cannot receive a direct view of the sky and hence 'sky light'. The working plane height is set at 850mm above floor level within residential property.

2.2.4 Where rooms are greater than 5m in depth and lit from only one side, the guidance recognises that *"a greater movement of the no skyline may be unavoidable"* (page 16, paragraph 2.2.12).

2.3 Detailed sunlight assessments (neighbouring properties)

2.3.1 For sunlight, the Annual Probable Sunlight Hours (APSH) test calculates the percentage of probable hours of sunlight received by a window or room over the course of a year.

2.3.2 In assessing sunlight effects to existing properties surrounding a new development, only those windows orientated within 90° of due south, and which overlook the site require assessment. The main focus is on living rooms, with bedrooms and kitchens deemed less important.

2.3.3 The guidelines suggest that the main living rooms within new buildings should achieve at least 25% of annual sunlight hours, with 5% during the winter period. For neighbouring buildings, the guide suggests that occupiers will notice the loss of sunlight if the APSH to main living rooms is both less than 25% annually (with 5% during winter) and that the amount of sunlight, following the proposed development, is reduced by more than 4%, to less than 0.8 times its former value.

2.4 VSC Façade Study

For high level or iterative assessments, detailed analysis including the modelling of neighbouring rooms may not be needed. Rather than assessing individual windows, VSC values are calculated at regular points across the affected building façade, typically at 1.6 m above ground or the base of the lowest storey and spaced at intervals not exceeding 5 m.

This approach is intended as a high-level daylight screening exercise. It allows the potential daylight relationship between buildings to be understood before detailed architectural design is available and helps determine whether a full daylight and sunlight assessment is warranted.

Where VSC values remain comfortably above guideline levels across the majority of the façade, the potential for material daylight impacts to future windows is limited. In such cases, detailed window-by-window testing is unlikely to materially alter the overall daylighting conclusions.

2.5 Daylight to new buildings or consented developments (BRE2022)

2.5.1 The 2022 update to the BRE 209 document was published on June 9th, 2022. The new guidance reflects the UK National Annex of the British Standard: BS EN17037 (2018) and provides two methodologies for assessing the internal daylight amenity to new or consented residential properties. These assessment methods are known as 'Daylight Illuminance' or 'Daylight Factor' and either can be applied.

Daylight Illuminance Assessment

2.5.2 The Daylight Illuminance method utilises climactic data for the location of the site, based on a weather file for a typical or average year, to calculate the illuminance at points within a room on at least hourly intervals across a year. The illuminance is calculated across an assessment grid sat at the reference plane (usually desk height).

2.5.3 The guidance provides target illuminance levels that should be achieved across at least half of the reference plane for half of the daylight hours within a year.[1] The targets set out within the national annex are as follows:

[1] The European Standard also includes a minimum illuminance target to be achieved over 95% of the reference plane however this need not apply to dwellings in the UK.

- Bedrooms – 100 Lux
- Living Rooms – 150 Lux
- Kitchens – 200 Lux

2.5.4 For spaces with a shared use the higher target would generally apply such that it would be appropriate to adopt a target of 150 lux for a student bed sitting room if students would often spend time in their room during the day. The guidance notes that discretion should be used and, for example, a target of 150 lux may be appropriate in a Living / Kitchen / Dining Room within a modern flatted development where the kitchens are not 'habitable' space and small separate kitchens are to be avoided.

Daylight Factor Assessment

2.5.5 The Daylight Factor method involves the computation of the daylight factor at each calculation point on the assessment grid.

2.5.6 The daylight factor is a ratio between internal and external illuminance expressed as a percentage. The calculation uses the CIE overcast sky model and is independent of orientation and location. In order to account for different climatic conditions at different locations different daylight factor targets may be applied for different cities with targets varying throughout the UK.

2.5.7 The daylight factor targets are to be achieved over at least 50% of the room assessment grid and are expressed as a median figure. For London these median daylight factor targets are:

- Bedrooms – 0.7%
- Living Rooms – 1.1%
- Kitchens – 1.4%

2.5.8 For multi-purpose living / kitchen / diner arrangements the higher 'kitchen' targets can be difficult to achieve due to the depth of internal space. In such cases, it is generally accepted that the 1.5% target for living rooms be used instead as this represents the predominant use of the space. The BRE guide gives the following: -

> *"2.1.15 non-daylit internal kitchens should be avoided wherever possible, especially if the kitchen is used as a dining area too. Daylight levels in kitchen areas should be checked. If the layout means that a small internal kitchen is inevitable, it should be directly linked to a well daylit room. Further guidance for assessment of this situation is given in Appendix C."*

2.6 Sunlight to new buildings or consented developments

2.6.1 In respect of direct sunlight, the 2022 BRE guidance reflects the BS EN17037 recommendation that a space should receive a minimum of 1.5 hours of direct sunlight on a selected date between 1st February and 21st March with cloudless conditions. It is suggested that 21st March (equinox) be used for the assessment.

2.6.2 The BS EN17037 criterion can be applied to all rooms of a unit but it is preferable for the target to be achieved within a main living room. Rooms in all orientations may be assessed and the sunlight received by different windows may be added together providing there is no 'double counting'.

2.6.3 Where a group of dwellings are planned the site layout and design should maximise the number of dwellings with main living rooms meeting these targets. It is also advised that a dwelling has at least one window wall facing within 90 degrees of due south.

3 Application of the guidance

3.1 Scope of assessment

Impact analysis for neighbouring buildings

3.1.1 The BRE guidelines advise that, when assessing any potential effects on surrounding properties, only those windows and rooms that have a 'reasonable expectation' of daylight and sunlight need to be considered. At paragraph 2.2.2 it states: -

> *"The guidelines given here are intended for use for rooms in adjoining dwellings where daylight is required, including living rooms, kitchens and bedrooms. Windows to bathrooms, toilets, storerooms, circulation areas and garages need not be analysed."*

3.1.2 As with the S73 proposals, our assessments therefore consider the neighbouring residential properties only, which the BRE recognises have the highest expectation for natural light. We have tested the impact on the main rooms in each residential property and ignored non-habitable space (e.g., staircases, hallways, bathrooms, toilets, stores etc.) as per BRE guidance.

3.2 Application of the numerical criteria

3.2.1 The opening paragraphs of the BRE guidelines state:

> *"The guide is intended for building designers and their clients, consultants and planning officials. The advice given here is not mandatory and the guide 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… In special circumstances the developer or planning authority may wish to use different target values. For example, in a historic city centre, or in an area with modern high-rise buildings, a higher degree of obstruction may be unavoidable if new developments are to match the height and proportions of existing buildings".*

3.2.2 It is therefore very important to apply the BRE guidance sensibly and flexibly, with careful consideration of the specific site context. Its numerical targets theoretically apply to any built environment, from city centres to rural villages. However, in more tightly constrained environments, achieving the default BRE targets can be very challenging and conflict with other beneficial factors of site layout design.

3.2.3 With the above in mind, rigid adherence to the BRE in certain situations could easily result in an inappropriate form of development. In which case it may be appropriate to adopt lower target values more appropriate to the location concerned. This is acknowledged in the BRE guidance at paragraph 2.2.3 (page 7):

"Note that numerical values given here are purely advisory. Different criteria maybe used, based on the requirements for daylighting in an area viewed against other site layout constraints.

3.2.4 For buildings that neighbour a new development, the guidance suggests that daylight will be adversely affected by the development, if either; its windows achieve a VSC below 27% and have their levels reduced to less than 0.8 times their former value, or the levels of NSC within rooms are reduced to less than 0.8 times their former values.

Appendix F – Setting alternative target values

3.2.5 In certain situations, the BRE guidance suggests that alternative target values may be set for the assessment of daylight and sunlight to neighbouring buildings.

"F1 Sections 2.1, 2.2 and 2.3 give numerical target values in assessing how much light from the sky is blocked by obstructing buildings. These values are purely advisory, and different targets may be used based on the special requirements of the proposed development or its location. Such alternative targets may be generated from the layout dimensions of existing development, or they may be derived from considering the internal layout and daylighting needs of the proposed development itself."

3.2.6 As suggested above, alternative target values may be set where the context of development is of a dense urban scale, where new buildings need to match the height and proportions of other existing buildings or where neighbouring buildings are set very close to the boundary.

Comparing existing planning consents

3.2.7 Where a site benefits from an extant but unimplemented planning permission, as is the scenario here, it is reasonable to refer to the daylight and sunlight performance of the S73 scheme as a contextual benchmark. This assists in establishing whether a revised, or in this case the RMA proposal, would give rise to any material change in impact relative to development that has already been deemed acceptable in planning terms.

3.2.8 However, as clarified in Appendix F2 of the BRE Guide, the "0.8 times former value" test applies only to existing buildings and windows that experience a reduction due to a new obstruction. The S73 scheme, being an unbuilt and theoretical form, does not constitute an existing scenario and therefore cannot be assessed using this target. Applying the 0.8 multiplier to the S73 scheme would not accord with the intent of the BRE methodology.

3.2.9 The appropriate approach is to undertake a direct comparison between the results for the illustrative masterplan submitted with the S73 and RMA schemes, considering the absolute differences in Vertical Sky Component (VSC) and Annual Probable Sunlight Hours (APSH). This allows the assessment to determine whether the detailed design introduces any additional or material loss beyond that already established through the extant permission. It is also important to consider the impacts of the

cumulative scheme including the additional phases in order to detail the effective 'worst-case' scenario in terms of daylight impacts.

3.2.10 It is also helpful to include a comparison of No-Skyline (NSL) results between the illustrative masterplan submitted with the S73 and RMA schemes. NSL provides an additional layer of insight into how the distribution of daylight within affected rooms may change, offering a useful barometer of the relative impact on internal daylight amenity. When considered alongside VSC and APSH, the NSL comparison supports a balanced understanding of whether the RMA design would materially alter the quality of daylight available compared with the S73 scheme.

3.2.11 Where such differences are negligible, the detailed RMA proposal for phases 2&3 can reasonably be regarded as having no materially greater impact than the illustrative masterplan submitted with the S73 scheme.

4 Sources of Information & Assumptions

4.1.1 A 3d measured survey has been used to create and update the 3D computer model of the proposed development in the context of the existing site and surrounding buildings.

4.1.2 As before, where survey or planning information was unavailable, the position of the neighbouring property elevations has been estimated based upon brick counts from site photographs. Window positions and dimensions used directly affect the results of all assessment methods.

4.1.3 The full list of sources of information used in this assessment is as follows: -

4.2 Survey Solutions

3D Laser Scan

31651IPLS01-03.dwg

Received 02/08/2021.

3105-DGM-ZZ-3D-X-M3-X-0001-001.rvt

Received 03/08/2021.

31651CVLS-04-07.dwg

31651CVLS-04-09.dwg

31651CVLS-04-11.dwg

Received 07/10/2021.

4.3 PRP Architects

HTC Final Design Freeze Issue

Received 21/01/2026.

HTC-PRP-03-00-GA-A-20800 - Phase 3 -

Ground Floor - DRAFT.dwg

HTC-PRP-03-01-GA-A-20801 - Phase 3 -

Level 01 - DRAFT.dwg

HTC-PRP-03-02-GA-A-20802 - Phase 3 -

Level 02 - DRAFT.dwg

Received 23/01/2026.

3D model

HTC-PRP-3D Dwg 251208.dwg

Received 25/08/2025.

4.3.1 In order to produce the daylight and sunlight assessments in line with BRE guidance, we have applied a number of inputs to represent the physical nature of the proposed development and surrounding context. These inputs are:

4.4 Material reflectance values

Surface	Reflectance value
Interior walls	0.8
Interior ceilings	0.8
Floors	0.4
Exterior walls and obstructions	0.2
Exterior ground	0.2

Table 1 - Surface reflectance of construction materials

4.5 Glazing properties

4.5.1 We have assumed that the glazing used within the development will be standard clear double glazed with a low emissivity coating with a diffuse transmittance factor of 0.68. We have also applied a window framing factor, to account for the proportion of frame to glazing. We have quantified this by measuring areas for windows across the proposed development.

4.5.2 We have also applied a maintenance factor to the windows to account for the build-up of dirt. These are listed in the table below: -

Type of window	Maintenance Factor
Vertical, no overhang	0.92
Vertical, sheltered from the rain	0.76
Sloping rooflight	0.84
Horizontal rooflight	0.76

5 The Site and Proposal

5.1.1 The Hayes Town Centre Estate is centrally located in Hayes, adjacent to the Grand Union Canal. It benefits from excellent connectivity, being within walking distance of Hayes & Harlington Station, which offers direct connections to Central London and Heathrow via the Elizabeth Line. The approved redevelopment proposals include the demolition of the existing estate and the construction of approximately 500 new homes, alongside a new community Centre and associated landscaping.

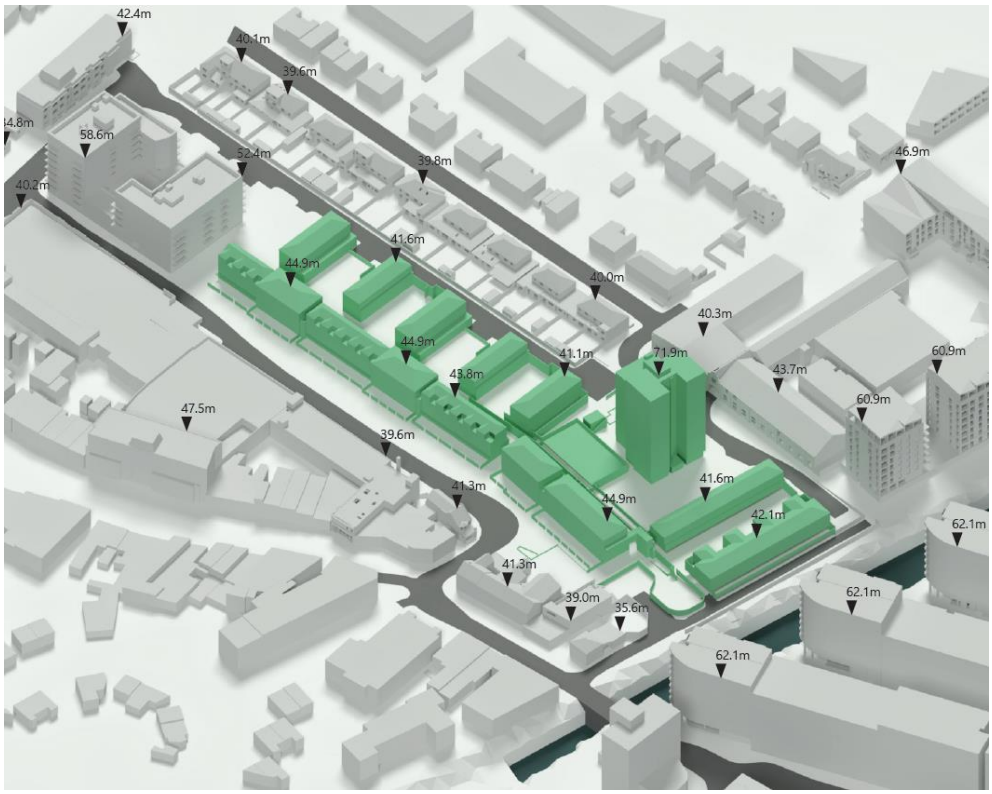

Image 1 - 3D view of the existing site within the surrounding context

5.1.2 The extant consent is a hybrid planning permission, with a detailed element (Phase 1) comprising 80 homes across two blocks (Blocks A and B) an outline element (Phase 2-5) with all matters reserved. Following the discharge of relevant planning conditions and the approval of previous amendment applications, Blocks A and B are currently under construction, with completion and handover anticipated in early 2026.

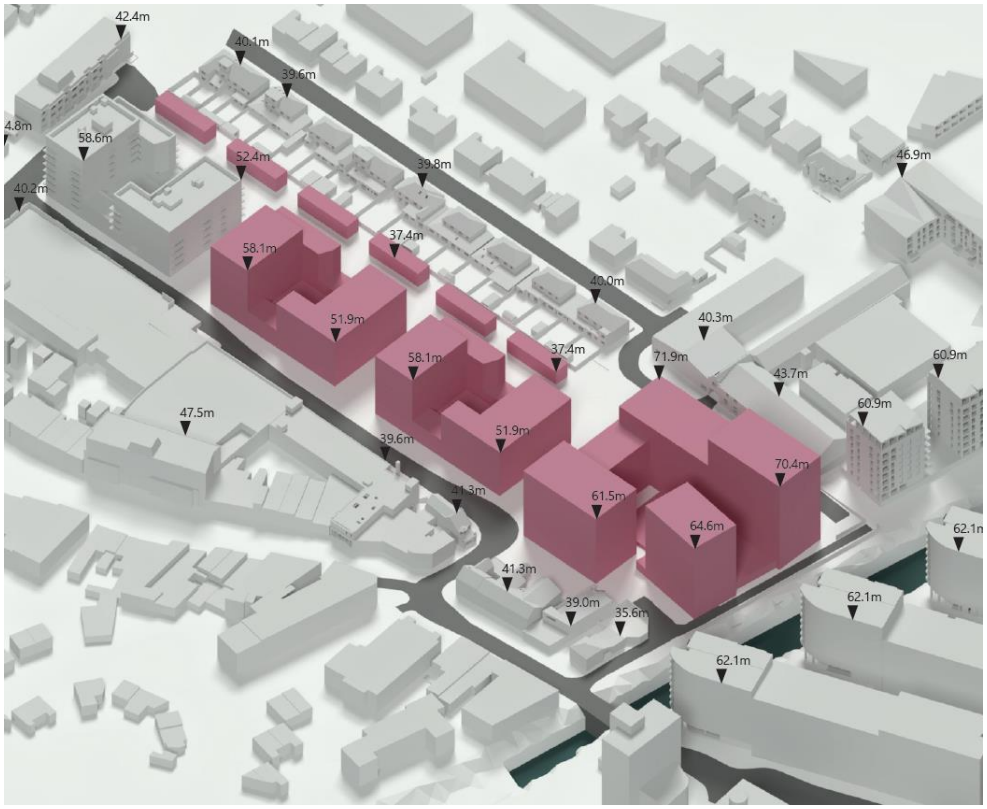

Image 2 - 3D view of the consented 2021 illustrative development and context

5.1.3 The submitted Section 73 application sought to revise specific conditions of the original planning consent (reference 76550/APP/2021/4499), including but not limited to conditions 3 (approved plans), 4 (approved documents), 5 (land use/quantum), 6 (housing mix), 7 (phasing plan), 9 (density), and 10 (building heights).

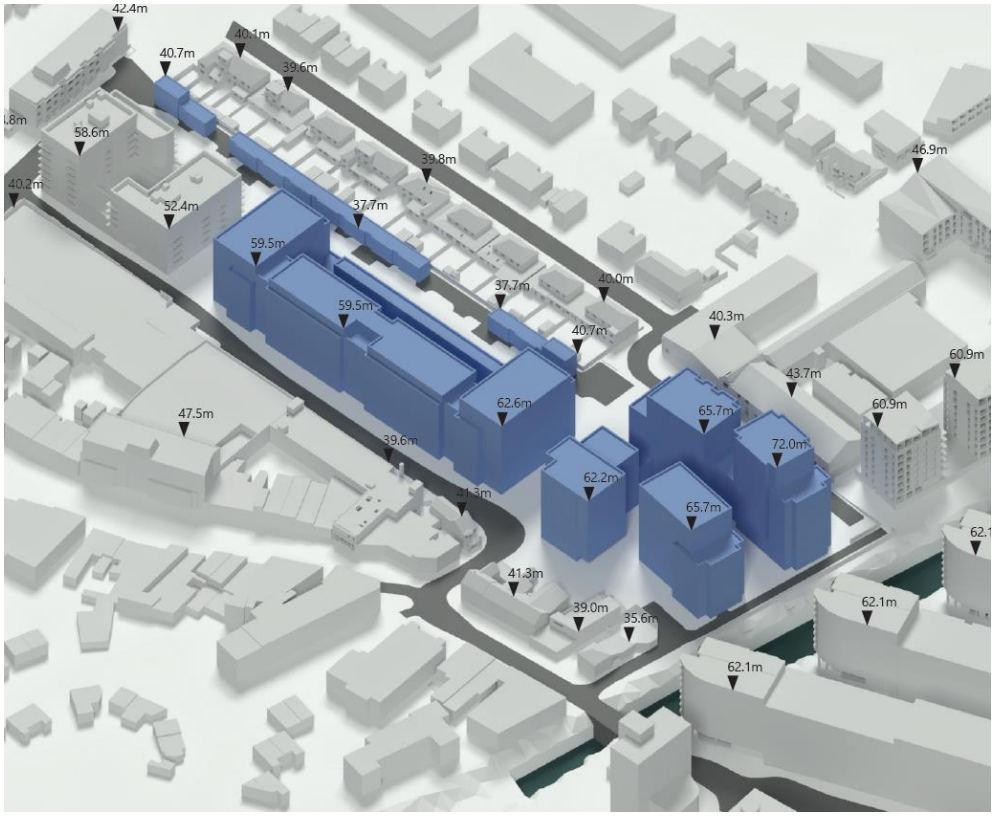

Image 3 - 3D view of the proposed 2025 S73 illustrative development and surrounding context

5.1.4 This Submission comprises of a Reserved Matters Application (Access, Appearance, Landscaping, Layout and Scale) pursuant to Condition 1 of Application ref: 76550/APP/2025/2864 (Outline permission (with all matters reserved) for residential floorspace (Class C3) including demolition of all existing buildings and structures; erection of new buildings; provision of a community centre (Use Class F2(b) floorspace); new pedestrian and vehicular access; associated amenity space, open space, landscaping; car and cycle parking spaces; plant, refuse storage, servicing area and other works incidental to the proposed development) for the erection of dwellings and community floorspace with associated landscaping and amenity space, parking, access and associated works. The proposed scheme is shown in the two images below both in the existing context and future cumulative scenario inclusive of phase 4 illustrative massing.

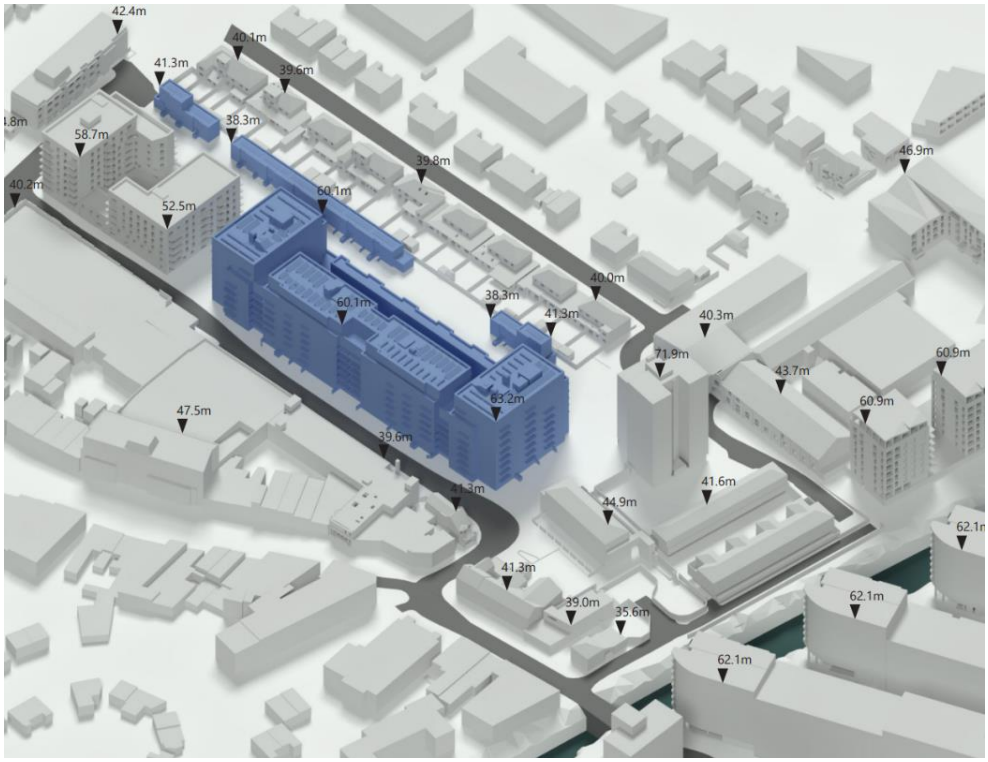

Image 4 - 3D view of the proposed 2025 RMA scheme (blue) and exisitng context

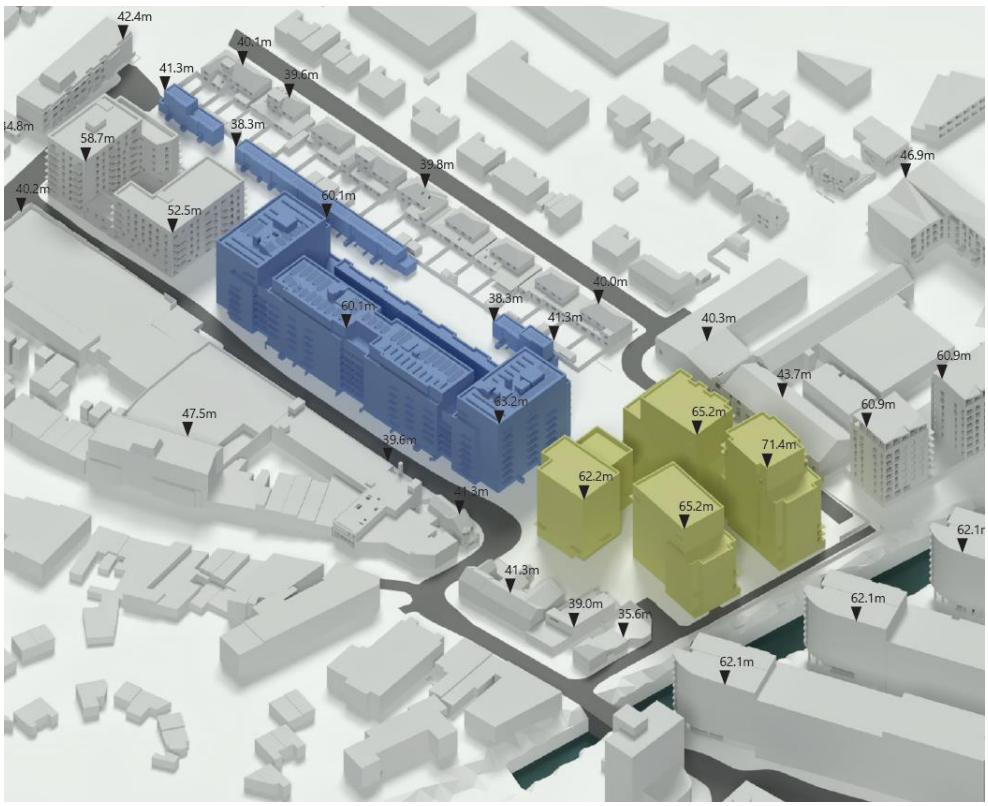

Image 5 - 3D view of the proposed 2025 RMA scheme (blue) and cumulative massing (yellow)

6 Assessment results

6.1 Daylight and sunlight to neighbouring buildings

6.1.1 Full results of the daylight and sunlight assessments are attached within Appendix 2. Drawings to show the existing and proposed buildings in the context of the neighbouring properties as well as window maps showing individual window references are attached within Appendix 1.

6.1.2 Our assessment has considered all of the closest neighbouring residential properties with windows overlooking the proposed development. These are shown on the following image: -

Image 6 - Plan of the existing site and the neighbouring properties considered for daylight and sunlight

18-22 Pump Lane	2-38 Little Road (evens)
Unit 8 Crauford Business Park	Navigation, Cardinal & Vantage Building
Brickfield Building B	81 Station Road, The Old Crown Pub
75 Station Road	63-73 Station Road (odds)
1A Crown Close	Phase 1a

6.1.3 The following assessments have considered the impacts of the proposed scheme compared to the impacts of the S73 illustrative masterplan scheme which was tested as part of the S73 application submission daylight report; thus, illustrating any positive or negative shifts in retained daylight/sunlight in accordance with Appendix F of the BRE guidelines. The impacts of this application are considered within the context of the cumulative development, including the potential impacts of phase 4 shown in yellow in image 4.

6.2 Phase 1a

Image 7 - Phase 1a

6.2.1 This 8-storey apartment building is located to the north of the site and forms part of the wider masterplan development and has been delivered as Phase 1A with the remaining phases forming the content of this report. As this part of the masterplan has been ostensibly built, we have considered the impacts to this building in

accordance with the BRE guidelines as normal.

6.2.2 We have modelled this building using the planning drawings submitted as part of the Phase A application.

Daylight

6.2.3 The results of the impacts of the RMA scheme indicate that the vast majority of the windows in this building will not be affected by the proposals due to their orientation facing predominantly east and west. Where reductions do occur, they are generally limited to reductions in VSC of 0.9% or less from the S73 illustrative masterplan scenario.

6.2.4 In terms of NSC changes between the scenarios are also limited with the majority of rooms experiencing no change between the S73 and detailed proposals. Where shifts in sky view do occur, they are limited to less than 1 sq. m. and thus entirely unnoticeable.

6.3 18-22 Pump Lane (Airlink Hotel)

Image 8 - Site photo of 18-22 Pump Lane. Front elevation

6.3.1 This 3-storey building is a hotel situated to the north of the site, approximately c.20m across Pump Lane.

6.3.2 We have used drawings obtained from the local planning authority (LPA Ref: 5505APP20151546) to inform our understanding of the internal arrangement within the hotel.

6.3.3 The BRE guidelines are principally intended for habitable rooms within adjoining dwellings. As this is a hotel and a commercial / transient use, a degree of flexibility should be applied when considering the amenity effects to this building.

6.3.4 As the BRE guidelines recommend that living rooms within adjoining dwellings are tested for sunlight effects, it has not been necessary to consider this property for sunlight impacts under the Annual Probable Sunlight Hours (APSH) criteria.

Daylight

6.3.5 The Vertical Sky Component (VSC) results show that the vast majority of the rooms will experience very little change in retained VSC when compared to the S73 illustrative masterplan scenario. Most rooms will retain absolute VSC levels equal to or in excess of the 27% BRE target and where reductions do occur, they are limited to 0.1% VSC and below and thus unnoticeable.

6.3.6 With respect to the No-Skyline (NSL), our results show no changes between the S73 illustrative masterplan scenario and RMA scenarios thus confirming the acceptability of the proposals with regards to daylight distribution.

6.4 2-38 (evens) Little Road

Image 9 - Google maps 3D aerial view of 2-38 Little Road

6.4.1 These semi-detached houses are located to the east of the proposed scheme and are arranged over two to three storeys. There are a number of windows across the rear elevations that overlook the development site to the west and specifically what will form the new terrace of houses on Austin Road.

6.4.2 Where planning drawings were available for the properties (at 8A, 12-18, 24, 30-32 & 38 Little Road) the internal configurations have been informed from the respective floorplans. For the remaining properties where planning information was limited, we have assumed the internal layouts from external inspection of the property.

6.4.3 The rear elevations of these neighbouring properties which face the scheme are not within 90º of north such that they are not relevant for sunlight assessment under the BRE guidelines. Our assessments are therefore limited to the potential daylighting effects to these properties as a result of the changes to the consent.

Daylight

6.4.4 Our VSC results for the proposed scheme demonstrate that the majority of windows along Little Road will continue to fully achieve the BRE recommendations for VSC. Where reductions between the S73 illustrative masterplan scenario and RMA scheme do occur, they are generally limited to 0.7% VSC or less with most windows retaining absolute VSC levels of 24% and above which in the context of urban regeneration is considered acceptable.

6.4.5 The No Skyline (NSL) analysis shows that the majority of habitable rooms experience little to no change in daylight distribution when comparing the S73 and RMA scenarios with several rooms experience positive shifts in daylight distribution.

6.5 Unit 8 Crauford Business Park

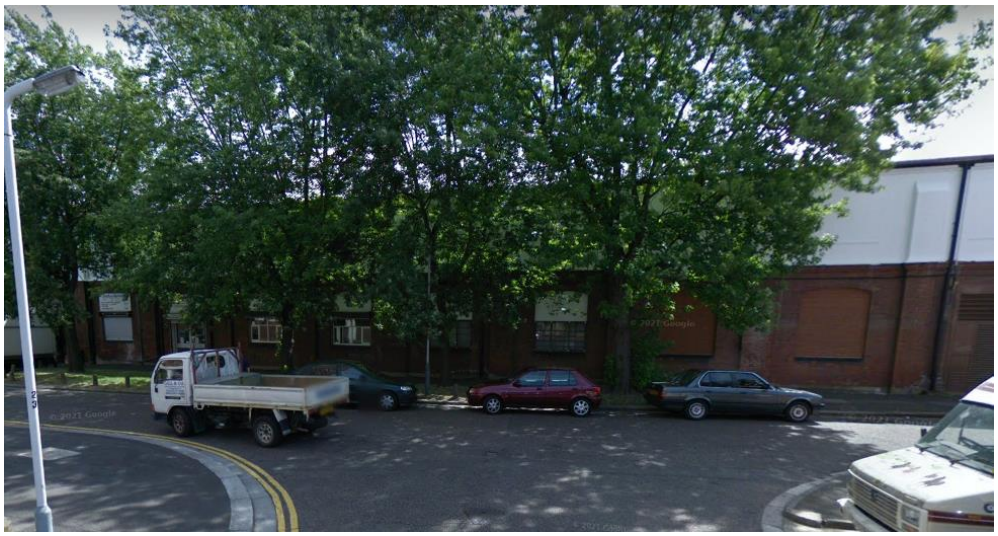

Image 10 - Unit 8 grade II listed façade, front elevation

6.5.1 Unit 8 Crauford Business Park is situated to the south-east of the site, across Silverdale Road. Whilst this neighbouring site is currently in commercial occupancy, the council have made us aware that this property may be developed to residential use in the future. As the front façade of the building is locally listed, this will likely be retained as part of any future development.

6.5.2 Whilst the current commercial / industrial use is not strictly relevant for daylight / sunlight assessment under the BRE guidelines, we have considered the potential daylight provision to future residential spaces using hypothetical single-aspect layouts at a depth of 4.27m. The width of the rooms has been informed by the position of the external columns and the neighbouring window apertures that overlook the Hayes Town Centre site.

6.5.3 In accordance with the previous daylight/sunlight report, our assessment also includes the potential daylight provision to the existing blocked up windows as requested by the Local Authority to understand the position if these areas were to be utilised as part of a future development.

6.5.4 As the locally listed façade overlooking the site is orientated to the northwest, these room are not considered relevant for sunlight testing under the Annual Probable Sunlight Hours (APSH) criteria. We have therefore focused on the daylight levels to these spaces.

Daylight

6.5.5 The previous report authored in 2021 applied the Average Daylight Factor (ADF) metric in analysing the hypothetical impacts to this property. Since the report was submitted the ADF metric is no longer considered as an appropriate criterion for

assessing light loss and no longer forms part of the BRE guidelines.

6.5.6 As outlined earlier in the report, Appendix F of the guidelines suggests that when comparing the impacts of an extant planning consent, it is appropriate to compare the VSC results of the S73 illustrative masterplan scenario and RMA scenarios in order to identify if the changes to the scheme result in negative or positive shifts in daylight. Whilst this building does not yet exist as residential accommodation, we have continued to apply the same assessment logic here.

6.5.7 Whilst the majority of the ground floor windows have been sealed, we have assessed these as open apertures as before. When compared to the S73 illustrative masterplan scenario 18 of the 21 'windows' assessed would enjoy greater levels of daylight than under the S73 scenario thus confirming the detailed design of the massing is having a positive influence on the daylight potential for this property. The remaining 3 windows experience no change between the two scenarios.

6.5.8 Given that the internal layouts we have modelled here are purely hypothetical it would not be appropriate to apply much credence to the NSC results. Notwithstanding, 16 of the 17 hypothetical rooms/spaces assessed in fact experience improvements in daylight distribution when comparing the S73 and RMA scenarios.

6.6 Navigation Building, Cardinal Building and Vantage Building

Image 11 - View of Navigation, Cardinal and Vantage Building from the site

6.6.1 These 3 residential apartment blocks are between 7 and 9-storeys in height and located to the south of the development site, approximately c.32m across the canal. The articulation of the buildings means that these neighbouring windows predominantly face to the north-east and south-west away from the site.

6.6.2 Whilst reasonably offset from the site, the design of this neighbouring elevation is somewhat 'self-limiting' with some windows overhung by balconies. Whilst these

balconies provide valuable private amenity space for the neighbouring residents, they do exacerbate daylight effects where they are reliant on low levels sky views.

6.6.3 We have used planning drawings (LPA Ref: 10057/APP/2005/1620) to inform our understanding of the internal arrangement across these residential buildings.

Daylight

6.6.4 Of the 180 windows assessed for VSC effects excluding the commercial and non-habitable rooms, all 180 will experience either no change when compared to the S73 illustrative masterplan scenario or improvements in daylight. Positive shifts confirm that the principles of the detailed design will result in improved daylight levels to all three apartment buildings.

Sunlight

6.6.5 In terms of direct sunlight, most of windows face north towards the site such that they are not relevant for assessment under the BRE guidelines. There are some windows marginally within 90° of south, though predominantly east facing, which will have oblique views of the scheme. These have therefore been considered for potential sun lighting effects.

6.6.6 Our APSH results show that all rooms will either experience improvements in APSH or see no change when compared to the S73 illustrative masterplan scenario where all of the relevant windows met the BRE targets.

6.7 Brickfields Building B

Image 12 - Consented development to the south east of the site along the canal

6.7.1 This neighbouring site is located to the south-east of the scheme, across Silverdale Road is currently occupied by industrial / commercial units. The site received planning consent in 2016 (planning ref: 71374/APP/2016/4027) for a residential-led development between four to 9-storeys in height known as Brickfields.

6.7.2 The western elevation of this proposed development has west facing windows looking towards the Hayes Town Centre site which have therefore been considered for daylight effects.

6.7.3 Where a new development is proposed but not yet built, the BRE suggest that the daylight illuminance is the appropriate assessment criteria as there are no occupants to experience a change in light levels.

6.7.4 During the design of these neighbouring apartments, the ADF test, which includes the assessment of reflected light, was used to establish whether a suitable amount of daylight would be provided and therefore is the appropriate measure to assess the future daylight provision with the Hayes Town Centre proposals in place.

6.7.5 As this consented elevation fronting Silverdale Road faces the scheme is orientated to the northwest, the neighbouring scheme is not relevant for sunlight assessment.

Daylight

6.7.6 Our daylight illuminance analysis of this consented scheme with the RMA scheme in place show that all of the consented habitable rooms of the Brickfields scheme overlooking the site would surpass the daylight illuminance recommendations of at least 150lux for a main living space and 100lux for a bedroom.

6.7.7 The assessments therefore demonstrate that the neighbouring scheme would maintain sufficient levels of daylight following delivery of the HTC RMA scheme.

6.8 81 Station Road – The Old Crown Pub

Image 13 - Site photo of the rear view of 81 Station Road

6.8.1 The Old Crown Pub is located at the south-west corner of the proposal fronting

Station Road. The pub itself occupies the ground level however there is one window at first level overlooking the site which is likely to be ancillary accommodation / bedroom space.

6.8.2 Information was limited for this building therefore have modelled the first level room from external inspection and assumed a room depth of 4.2m.

6.8.3 Although the window at first level is orientated within 90° of south and faces towards the scheme, the room is likely to serve a bedroom. As such, it is not relevant for sunlight assessment under the BRE criteria.

Daylight

6.8.4 The results of our VSC assessments show that the first level window will experience a marginal improvement in VSC when compared with the S73 illustrative masterplan scenario with a positive shift of 0.2% VSC alongside an increase in daylight distribution also.

6.9 75 Station Road

Image 14 - Site photos of the rear view of 75 Station Road

6.9.1 This two-storey property is currently mixed use, with retail across the ground floor and residential accommodation located at the first floor. From external inspection of the property, the nearest rooms with high level windows facing the site are likely to serve a bathroom and a dual aspect kitchen. There are 2 further windows set back at first level which serve circulation and dual aspect space lit by windows overlooking Station Road.

6.9.2 Non-habitable uses such as bathrooms and circulation spaces are not relevant for assessment under the BRE criteria therefore we have focussed on the effects to the dual aspect kitchen (R2) and the habitable space set back at the rear entrance terrace

(R3).

6.9.3 Given we were unable to confirm the use of Room 3 we have included this space within our consideration of potential sunlight effects.

Daylight

6.9.4 Based on the comparison against the S73 illustrative masterplan scenario, all of the habitable rooms in this property will experience positive shifts in retained VSC under the RMA proposals. The results indicate that daylight levels will improve by up to 0.2% VSC.

Sunlight

6.9.5 Based on the S73 illustrative masterplan scenario, our APSH results for First floor level R3 confirm no change between the two scenarios.

6.10 63-73 Station Road (odds)

Image 15 - Rear views of 63-73 Station Road

6.10.1 These mixed-use properties are located to the south-west corner of the site and are under commercial occupancy at the ground floor with residential accommodation located at the upper floors.

6.10.2 There are a number of windows to the rear elevations of these properties overlooking the site however we expect most of these to serve bedrooms or secondary /non-habitable spaces with the main living rooms overlooking Station Road.

6.10.3 We have based the internal modelling of no.71 on layouts obtained from the local planning authority (REF:75848/APP/2020/2745 and REF70288/APP/2015/1089) and assumed layouts have been applied in respect of the remaining residential spaces across 63-69 and 73-75.

6.10.4 As the main living rooms within these properties are likely to be positioned within the front elevations facing away from the scheme there will be no amenity impact to those spaces and no loss of sunlight to any relevant rooms.

Daylight

6.10.5 The VSC and NSL analysis for these properties shows that the changes incorporated to the detailed scheme result in a greater level of retained VSC to the majority of

windows serving these properties than under the S73 illustrative masterplan scenario. The refinement and improvements made to the articulation of the blocks in the southern element means that improvements of up to 0.1-0.2% VSC are being recorded.

6.10.6 In terms of NSC, positive changes in daylight distribution are also noted to affect the majority of the residential rooms which confirms the refinements to the S73 illustrative masterplan scenario will result in greater levels of retained daylight to these properties.

6.11 1A Crown Close

Image 16 - Eastern elevation of 1A Crown Close, side elevation

6.11.1 This property is located directly to the west of the proposal, on the eastern side of Crown Close and comprises a commercial unit at ground level and residential accommodation to the upper floors.

6.11.2 The principal windows to the property are located to the front, south facing, elevations however there are windows at ground and second floor overlooking the site to the east. From plans available from the Hillingdon planning portal, we understand that the second level room serves a kitchen and has therefore been considered for daylight effects. The ground level aperture is a delivery hatch to the rear of commercial unit at ground level and is not relevant for daylight / sunlight analysis under the BRE criteria.

Daylight

6.11.3 The VSC results based on the comparison between the S73 illustrative masterplan scenario and detailed schemes show a marginal reduction to the kitchen windows

although this is limited to just 0.7% VSC. Whilst these show that further daylight reductions could be likely, the proximity of these windows to the boundary does mean that a degree of change is inevitable. Notwithstanding this, each window will retain an absolute VSC of at least 17.9% which is consistent with levels found in urban development.

6.11.4 With regards to the NSL, all rooms, with the exception of the second-floor kitchen, record no noticeable shift in daylight penetration. The second level kitchen is a more secondary 'non-habitable' space such that the impact is considered to be acceptable particularly as the No-Skyline will continue to extend to over half of the room.

Sunlight

6.11.5 In respect of direct sunlight, there is 1 main living space at first level with a view of the scheme. We have therefore tested this space for sunlight effects due to its southerly orientation.

6.11.6 The results from our APSH assessments show that the main living space significantly exceeds the targets for sunlight receiving 66% for total annual sunlight levels and 16% for the winter months.

6.12 Phase 4 & Skeffington Court – Façade Analysis

6.12.1 This RMA application includes the detailed massing for phase 2&3 of the proposed Hayes Town Centre Estate Regeneration. Whilst Phase 4 will form part of a later application we have considered the potential impacts of the massing for phases 2&3 both on the remaining building, Skeffington Court, and on the site of phase 4 and the phase 4 massing itself.

6.12.2 As the detailed design of the phase 4 blocks is not yet fixed in terms of façade detail and internal room configurations. We have therefore undertaken a façade analysis to demonstrate the daylight potential for the future proposed accommodation within phase 4.

6.12.3 This façade study considers the VSC at points along the outline facades to understand the potential sky visibility in areas where the scheme windows and rooms are yet to be defined. This helps to ensure that good levels of amenity will be enjoyed within the proposed accommodation.

6.12.4 For these assessments we have considered the daylight potential using the S73 illustrative masterplan scenario for phase 4. Here we have considered the relationship between the southern most block of phase 3, Block F and the northern facades of phase 4 as shown in the image below.

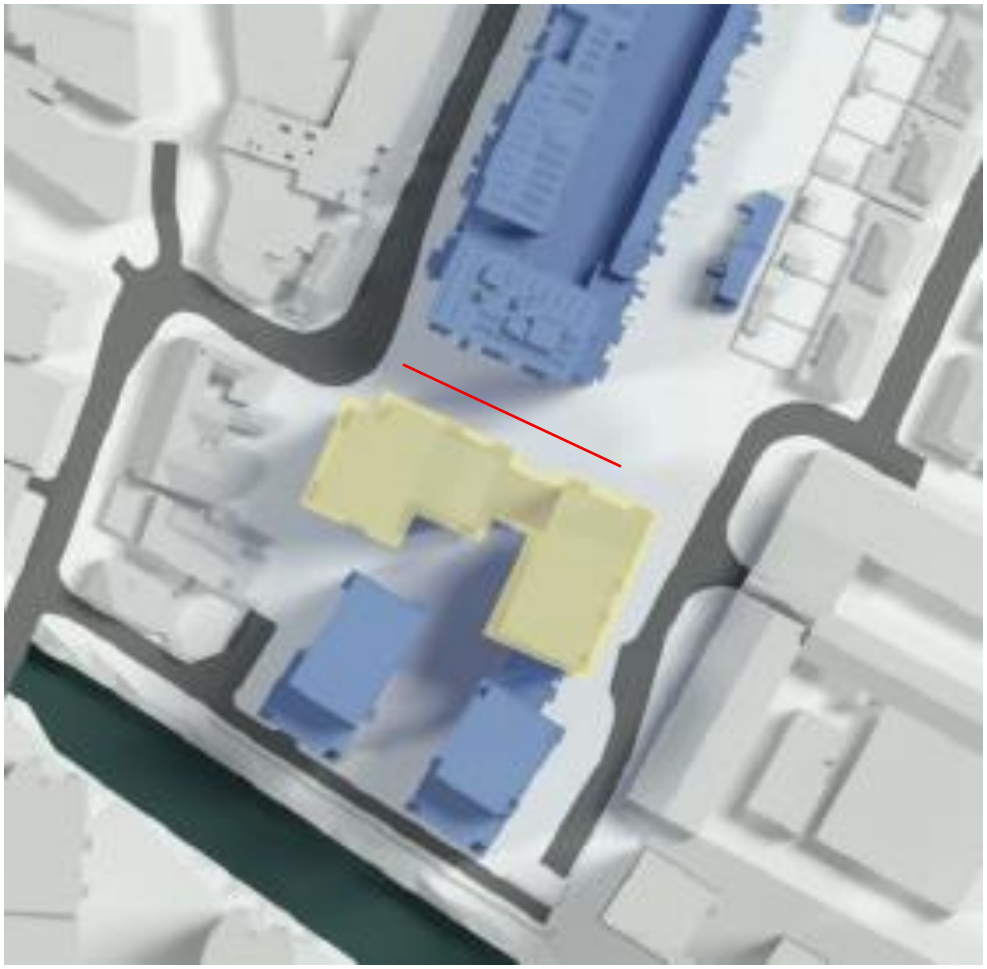

Image 17 - VSC Façade study location (plan) view

6.12.5 Our VSC façade study for phase 4 using the S73 illustrative masterplan massing illustrates that all of the north facing elevations will generally achieve or exceed 27% VSC such that the delivery of phase 2&3 would not significantly impact the future design of the units under the future phase 4 reserved matters application. Where prospective VSC levels fall below 27% they are isolated to the lowest floors facing onto the southern wing of Block F and will achieve VSC values of c.13.5% and above indicating that only a small number of windows would potentially experience lower levels of daylight.

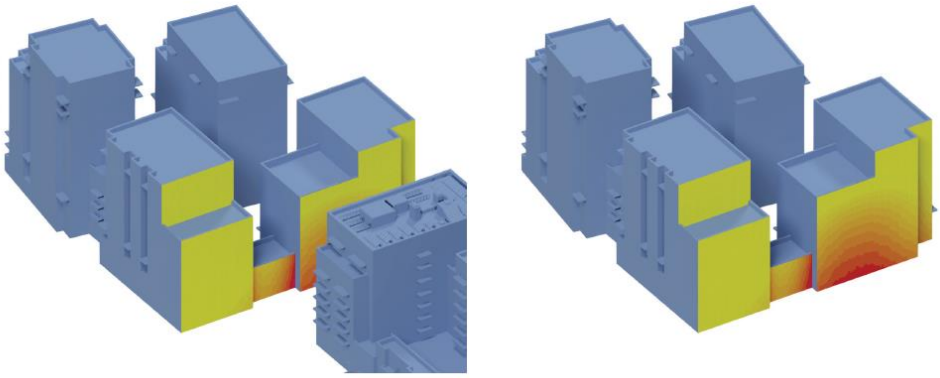

Image 18 - VSC façade study, phase 4, northern elevation

6.12.6 In multi-phase developments, buildings are often positioned in relatively close proximity as part of a coordinated urban design strategy. This relationship can reduce sky visibility when compared to isolated buildings; however, such effects are inherent to higher-density urban environments and do not in themselves indicate poor daylighting.

6.12.7 It is also relevant that each phase of a comprehensive development is designed with knowledge of the wider masterplan. The resulting inter-relationship between blocks is therefore intentional and balanced across the site

6.12.8 In addition to the potential impacts to phase 4, we have also considered potential daylight levels to the remaining part of the estate which will exist as an interim scenario between the delivery of phases 2&3 and phase 4. Skeffington House will remain at least temporarily adjacent to the southern wing of Block F. Whilst Skeffington House only has a limited number of windows in its northern elevation which are shown in the image below.

Image 19 - Skeffington House, northern elevation

6.12.9 The results of the VSC façade analysis show that Skeffington House will continue to comfortably exceed BRE daylighting targets following the delivery of phases 2&3. The assessment shows the whole of the northern façade achieving VSC values in excess of 27% such that the delivery of the RMA scheme will have no material impact on Skeffington House.

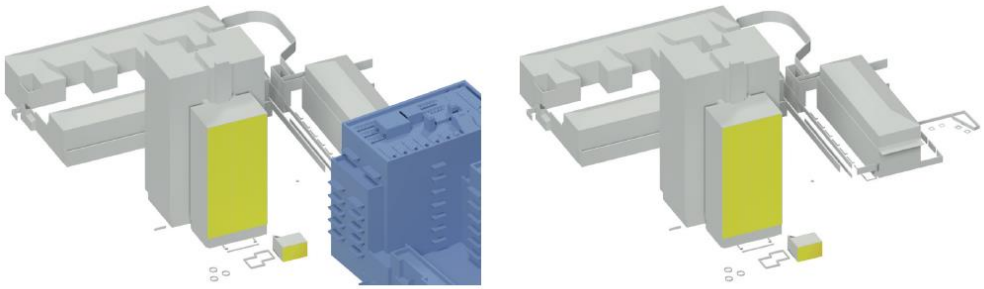

Image 20 - Skeffington House, VSC façade study following delivery of phase 2&3

6.13 Sunlight within the proposed gardens and amenity areas

6.13.1 The refinements to the massing to the scheme have resulted in updates to the landscape plan and refinements to the layout of the external amenity provisions. Accordingly, we have assessed the provision of sunlight to the proposed private amenity and shared communal areas using the BRE's two hours sun contour (sunlight amenity) assessment as before. This has considered the amenity areas and open spaces within the scheme in accordance with the landscape plans as shown in the image below.

6.13.2 The location of the amenity areas and extents have been carefully refined to optimise sunlight to the primary external spaces and moving the articulation and circulation areas to more shaded parts of the public realm. We have included the cumulative phase 4 massing in order to provide a holistic assessment of the amenity provision to understand potential impacts of the phase 4 massing located to the south.

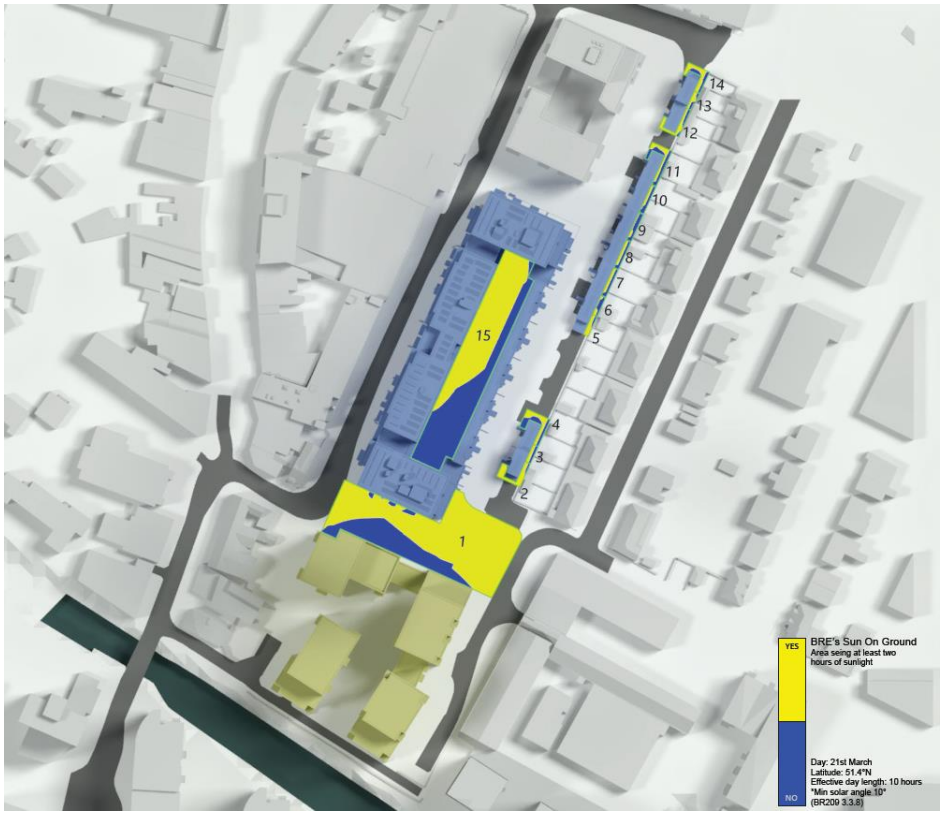

Image 21 - Sunlight amenity provision, March 21st

6.13.3 The results of this analysis are shown on our drawings within Appendix 5. Our sunlight amenity results show both of the communal amenity spaces within phases 2&3 will exceed the recommended 50% target. This assessment also considers the future impacts of phase 4 and confirms that the space between Block F and phase 4 (Area 1) will comfortably meet the BRE targets in future.

6.13.4 The improvements to the streetscape along Austin Road have led to some changes in the siting of the houses and gardens. Accordingly, we have updated the analysis of these to consider the sunlight to the private gardens serving these houses.

6.13.5 The result of this analysis is also included in drawing in the appendices indicates that of the 13 gardens assessed, 6 will exceed the 50% target, 4 will achieve at least 40% and above whilst just 3 will experience 2 hours of sunlight to less of the space.

6.13.6 However, the limitations that some of these garden's experience in respect of direct sun is primarily down the position of the existing rear wall and some outbuildings in the gardens serving the houses fronting onto Little Road. These external obstructions partially hinder sunlight to some of the gardens although the majority will still perform well.

6.13.7 Our sunlight exposure diagrams are useful in illustrating that the where the gardens do fall short of the target, o they are only marginally below the recommended 2-hour threshold with the majority of the areas achieving 1.6-2 hours of sunlight; shown graded orange to yellow in the image below. Given large areas are on the cusp of the 2-hour threshold, this is unlikely to significantly affect the quality of the space.

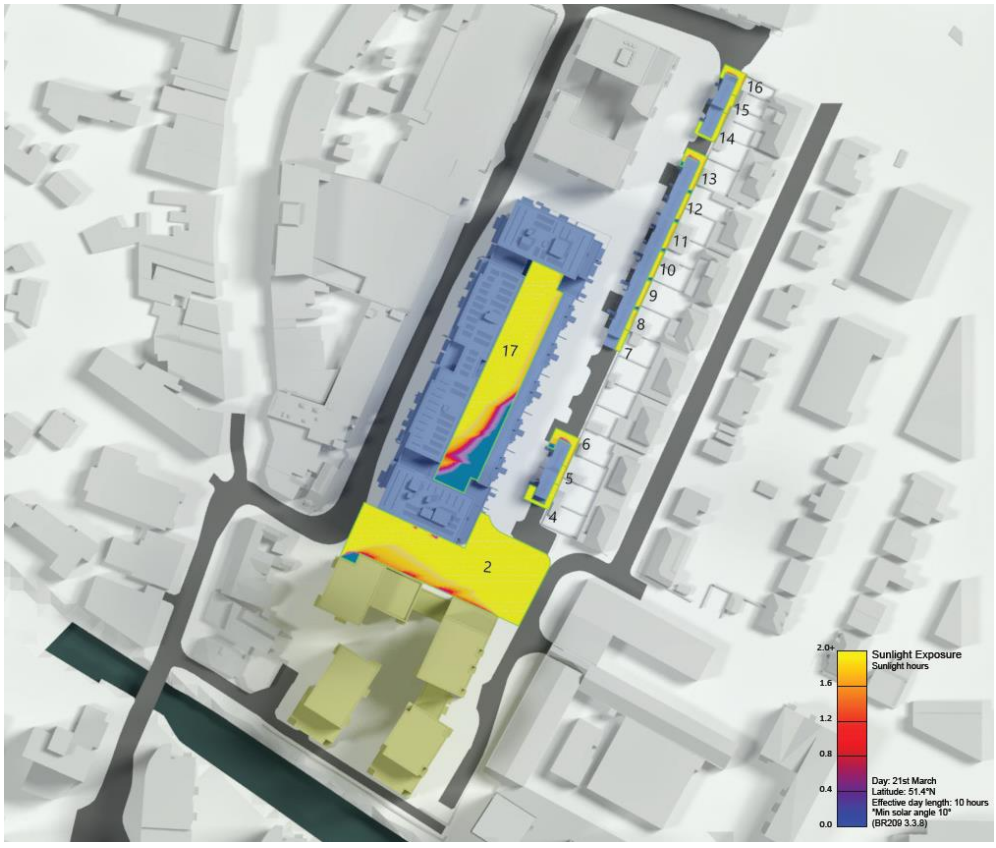

Image 22 - Sunlight exposure diagram on the 21st March

6.13.8 As part of the analysis, we have provided a supplementary assessment showing the relative sunlight to the amenity spaces on the 21st June which is the time when the spaces will invariably be used most. The amenity provision for 21st June is shown in the image below with the full results attached in Appendix 2.

6.13.9 The assessment confirms that all of the spaces achieve the relevant BRE targets on 21 June, which represents the period of highest sun position and peak seasonal use. This date is considered a critical point in the year, as external amenity spaces are

typically used most intensively during the summer months. The results therefore demonstrate that the gardens will retain good levels of sunlight at the time when this amenity is of greatest value to occupants.

Image 23 - Sunlight amenity provision, June 21st

6.13.10 Overall, whilst there will be deviations in terms of sunlight / overshadowing within the scheme, all of the amenity spaces within the proposed scheme enjoy sunlight levels close or equal to the BRE 2-hour target on the 21st March as shown in our sunlight exposure study.

6.13.11 Finally, all of the proposed amenity areas will enjoy more than 2 hours of direct sunlight on the 21st June during the summer when the spaces will most used.

6.13.12 The proposals demonstrate a clear commitment to achieving good levels of sunlight within the scheme, with testing confirming that key amenity areas benefit from direct sunlight for substantial parts of the day. This reinforces the overall quality and usability of the spaces and aligns with the aspirations of the BRE guidance.

6.14 Daylight and sunlight within the proposed new dwellings

6.14.1 We have undertaken an assessment of the internal amenity to the proposed units in line with the assessments set out in the 2022 BRE guideline document. The results of these assessments are attached within the appendix.

Daylight

Room	No. of rooms assessed	Rooms meeting target
Living Room	56	54
Kitchen	24	5
Bedroom	459	431
LKD	174	135
KD	31	25
Total	744	650 (87%)

Table 2 - Summary daylight results for proposed accommodation

6.14.2 The results of the internal daylight and sunlight analysis are detailed block by block below.

Block C

Room	No. of rooms assessed	Rooms meeting target
Bedroom	105	97
LKD	39	28
Living Room	14	14
KD	10	9
Kitchen	4	4
Total	172	152 (88%)

Table 3 - Block C summary results

Image 24 - Block C

6.14.3 152 of the 172 rooms in Block C will meet the relevant daylighting targets. The 8 bedrooms that do not meet the 100lux target are located at the northern end of Block C on ground and first floor and sit adjacent to, or beneath balconies serving the floors above. All 8 bedrooms achieve a lux value of at least 68lux which is not a significant deviation from the 100lux target.

6.14.4 The 11 LKDs that fall below the 150lux target are also located on the northern side of the building. Each of these living spaces are generously proportioned and situated beneath balconies which can inhibit the amount of light that can reach the rear of the room where the kitchens are located.

6.14.5 The single Kitchen/Diner that falls below the target is also located on the northern side of the building and set close to the balcony serving the appartement above. Whilst this space does fall short of the 150lux target it is linked to a very well-lit living room which achieves a lux value of 323 which confirms the positioning of the key living area has been prioritised.

6.14.6 As an informative assessment we have considered the daylight to these main living spaces with the kitchens notionally removed in order to demonstrate the amount of daylight the key living space would achieve without the kitchen element that would also benefit from additional task lighting.

6.14.7 The notional removal of the kitchen elements within the proposed LKDs demonstrates that the underlying daylight performance of the principal living areas is materially stronger than the aggregate figures suggest. When the kitchens are excluded, the assessment isolates the part of the room closest to the window and shows that this zone receives a high proportion of unobstructed daylight, with light penetrating more deeply into the space than the combined layout implies.

6.14.8 The results of this secondary analysis show a further five rooms would meet the 150lux target confirming that the majority of the key living areas (34/39) will in fact enjoy good levels of daylight. The remaining four LKDs which fall below the target would achieve a lux value of 101 or higher.

6.14.9 In terms of sunlight, 29 of the 54 units will meet the 1.5-hour sunlight target. Given the orientation of the site being partially north facing this is considered to be a good of compliance. Site geography and room distribution means that not every unit can be south facing and there are myriad factors to consider when planning layouts. Whilst not all of the units will have a south facing window the individual lux values confirm that daylight with Block C will be very good despite some units falling below the sunlight target.

Block C Duplexes

Room	No. of rooms assessed	Rooms meeting target
Bedroom	11	9
KD	2	1
LKD	1	0
Living Room	2	1
Total	16	11 (69%)

Table 4 - Block C Duplexes summary results

6.14.10 These three duplexes are located on the lower floors of Block C. Natural site constraints which are not unique to this scenario mean that inevitably the rooms on the lowest floors will be more constrained particularly when considering the impact that balconies and overhangs may have on the units below.

6.14.11 Despite some rooms falling below the targets the daylight levels are otherwise reasonably high given the constraints outlined above. The LKD which falls below the target achieves over 100lux which is considered a good level of daylight particularly at lower level. The living space at first floor level in DP3 (R4) achieves a lux value of 83 but faces towards the private amenity space within the courtyard which somewhat offsets this deviation due to the pleasant outlook. The two bedrooms which fall below the 100lux target achieve 37 and 70lux respectively whilst the remaining nine all well exceed the BRE target.

6.14.12 Where we have carried out the secondary 'kitchens off' analysis for these duplexes the results indicate that the previously failing LKD would meet the target which suggests that even with the presence of the balconies the primary living spaces in these room will achieve good levels of daylight.

6.14.13 In terms of sunlight, two of the three duplexes will meet the target. The single outlier is located on the northern side of the building and thus cannot reach the suggested target. As outlined above sunlight availability is just one of many site constraints that

must be balanced and invariably a small number of units will need to be located without a southerly facing window.

Block D

Room	No. of rooms assessed	Rooms meeting target
Bedroom	85	84
LKD	37	33
Kitchen	9	0
Living Room	9	9
Total	140	126 (90%)

Table 5 - Block D summary results

6.14.14

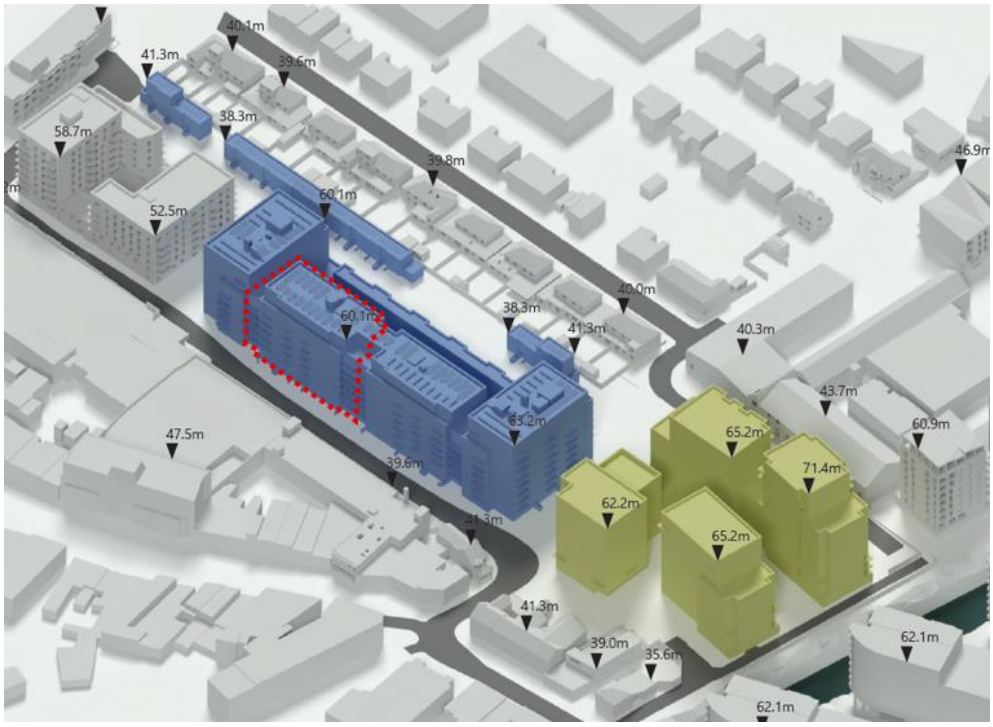

Image 25 - Block D

6.14.15 126 of the 140 rooms in Block D will meet the relevant daylighting targets. The single bedroom that does not meet the 100lux target achieves a lux value of 91lux which is not a significant deviation from the 100lux target.

6.14.16 The four LKDs that fall below the 150lux target are also located at ground, first and second floor level. Each of these living spaces are generously proportioned and located beneath a balcony which can inhibit the amount of light that can reach the rear of the room where the kitchens are located. Notwithstanding all four will achieve a lux value of 61lux or higher which suggests that despite their location in the lower part of the building, the internal daylight levels will otherwise be reasonable.

6.14.17 Where we have carried out the secondary 'kitchens off' analysis for Block D the results

indicate that one further LKD would meet the target which suggests that even with the presence of the balconies the primary living space in this room (R13 2nd Floor) will achieve good levels of daylight. The remaining three which fall below the target will achieve a lux value of at least 130 which is not significantly below the 150 lux target.

6.14.18 The proposed plans for Block D include a single stand alone kitchen on each floor located in the corner of the western side of the building which is set beneath a balcony. Whilst all 9 of these fall below the 200lux target they each achieve a respective lux values of at least 99 which suggests despite the deviations the actual 'real world' light levels will be reasonable, particularly higher up the building. The BRE guide does acknowledge that where kitchens may not be able to reach the target value, it is helpful if they are linked to a well-lit living space which is the case here with all adjoining living rooms from 1st floor and upwards meeting the required 150lux target.

6.14.19 In terms of sunlight, 42 of the 46 units in Block D will meet or exceed the sunlight target which is an excellent level of compliance. The results for this block confirm that layouts and window placement has been carefully considered alongside other site constraints to provide residents with excellent levels of amenity.

Block D Duplexes

Room	No. of rooms assessed	Rooms meeting target
Bedroom	5	4
LKD	2	0
Total	7	4 (57%)

Table 6 - Block D duplexes summary results

6.14.20 These two duplexes are located on the lower floors of Block D. Natural site constraints which are not unique to this scenario mean that inevitably the rooms on the lowest floors will be more constrained particularly when considering the impact that balconies and overhangs may have on the units below.

6.14.21 Despite some rooms falling below the targets the lux levels are otherwise reasonably good given the constraints outlined above. The two LKDs which fall below the target achieve 92 and 67lux respectively. Where we have assessed these LKDs without the kitchens the results indicate that the living areas would achieve much higher levels of daylight increasing to 212 and 141lux when the kitchen areas to the rear are removed.

6.14.22 In terms of sunlight, both duplexes will meet the target indicating the siting of these units has been carefully considered to optimise internal amenity.

Block E

Room	No. of rooms assessed	Rooms meeting target
Bedroom	90	89
LKD	43	37
Kitchen	9	0
Living Room	10	10
Total	152	137 (90%)

Table 7 - Block E summary results

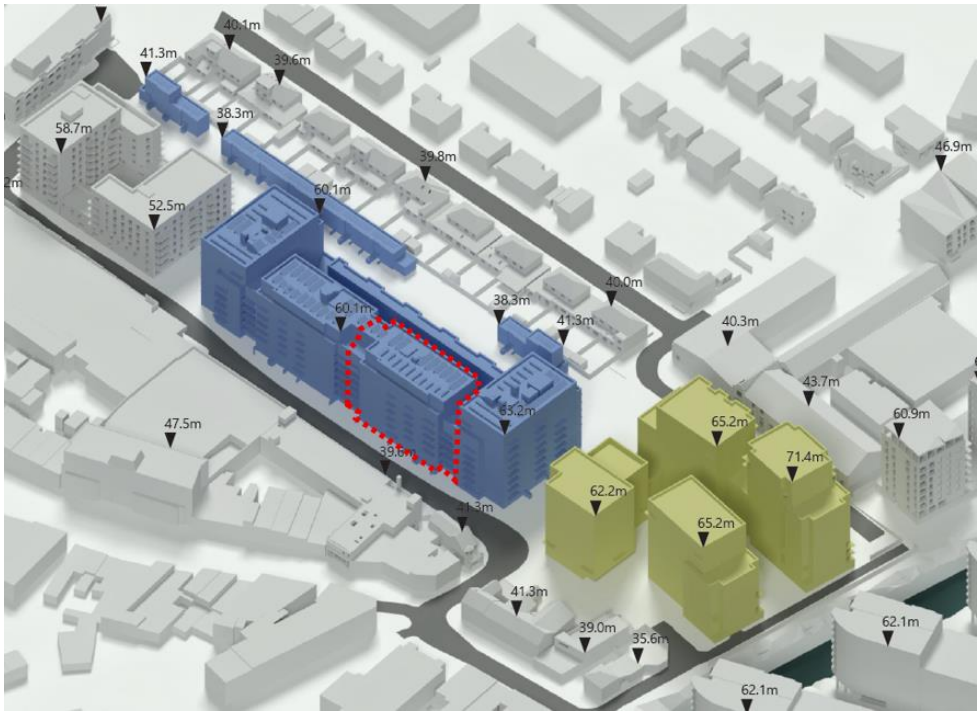

Image 26 - Block E

6.14.23 137 of the 152 rooms in Block E will meet the relevant daylighting targets. The single bedroom that does not meet the 100lux target achieves a lux value of 59lux and is located on the eastern side of the building at first floor level. This bedroom is set beneath a balcony serving the unit above which, whilst providing important private amenity space, will inhibit daylight to a certain extent to the window and room below.

6.14.24 The six LKDs that fall below the 150lux target are also located at ground, first and second floor level. As with the neighbour Block, Block D, each of these living spaces are generously proportioned and located beneath balconies which can inhibit the amount of light that can reach the rear of the room where the kitchens are located. Notwithstanding all four will achieve a lux value of 78lux or higher which suggests that despite their location in the lower part of the building, the internal daylight levels will otherwise be reasonable.

6.14.25 Where we have carried out the secondary 'kitchens off' analysis for Block E the results

indicate two further LKDs would meet the target with the remaining four achieving 98lux and above when the kitchen is notionally removed.

6.14.26 As with Block D, the proposed plans for Block E include a single stand alone kitchen on each floor located in the corner of the western side of the building which is set beneath a balcony. As is the case with Block D, whilst all nine of these fall below the 200lux target they each achieve a respective lux value of at least 99 which suggests despite the deviations the actual 'real world' light levels will be reasonable, particularly higher up the building.

6.14.27 The BRE guide does acknowledge that where kitchens may not be able to reach the target value, it is helpful if they are linked to a well-lit living space which is the case here with all adjoining living rooms from 1st floor and upwards meeting the required 150lux target.

6.14.28 In terms of sunlight, 44 of the 52 units in Block E will meet or exceed the sunlight target which is an excellent level of compliance. The results for this block confirm that layouts and window placement has been carefully considered alongside other site constraints to provide residents with excellent levels of amenity.

Block E Duplexes

Room	No. of rooms assessed	Rooms meeting target
Bedroom	5	5
LKD	2	0
Total	7	5 (57%)

Table 8 - Block E duplexes summary results

6.14.29 These two duplexes are located on the lower floors of Block E. Natural site constraints which are not unique to this scenario mean that inevitably the rooms on the lowest floors will be more constrained particularly when considering the impact that balconies and overhangs may have on the units below.

6.14.30 Despite some rooms falling below the targets the lux levels are otherwise reasonably good given the constraints outlined above. The two LKDs which fall below the target achieve 95 and 72lux respectively. Where we have assessed these LKDs without the kitchens the results indicate that the living areas would achieve much higher levels of daylight increasing to 216 and 145lux when the kitchen areas to the rear are removed. It is noted that all 5 of the bedrooms within these units will meet the 100lux target.

6.14.31 In terms of sunlight, both duplexes will meet the target indicating the siting of these units has been carefully considered to optimise internal amenity.

Block F

Room	No. of rooms assessed	Rooms meeting target
Bedroom	120	107
LKD	50	37
Kitchen	2	0
Living Room	9	9
KD	7	5
Total	188	158 (84%)

Table 9 - Block F summary results

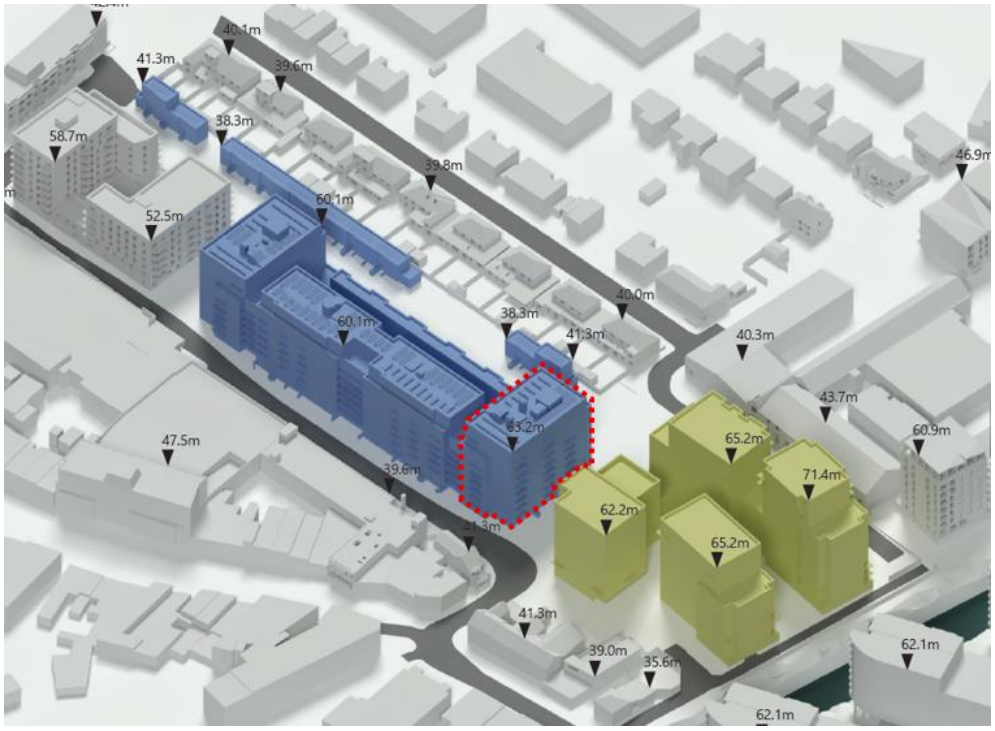

Image 27 - Block F

6.14.32 158 of the 188 rooms in Block F will meet the relevant daylighting targets. The 13 of the 120 bedrooms that fall below the targets are located between ground and third floor. Of these 13 bedrooms, 12 will achieve at least 70lux so not considered to be a significant deviation from the 100lux target. The remaining bedroom R12 at first floor level achieves 55lux which, considering its location within the building, would still be considered reasonable given the secondary nature of the room use.

6.14.33 The 13 LKDs that fall below the 150lux target are located between ground and fourth floor level. Seven of these achieve at least 100lux with the remaining six achieving 50lux or more. The majority of these rooms are located on the southern elevation of Block F and orientated towards the latter phases of the development. Where blocks within the site face one another, there is the potential for mutual shading. This is a typical outcome in well-planned residential developments and has been carefully

managed through building spacing, orientation and massing. Detailed testing confirms that the resulting daylight levels remain within accepted standards for new residential accommodation given the constraints. As with the neighbour blocks D and E, each of these living spaces are generously proportioned and the presence of the balconies can inhibit the amount of light that can reach the rear of the room where the kitchens are located.

6.14.34 Where we have carried out the secondary 'kitchens off' analysis for Block F the results indicate that a further eight LKDs would meet the target which suggests that even with the presence of the balconies the primary living spaces in these rooms will achieve good levels of daylight. The remaining five will all achieve 98lux and above when the kitchen is notionally removed from the assessment.

6.14.35 Within Block F there are two units on floors seven and eight which include separate kitchens and living rooms. Here the kitchens will fall below the 200lux target however will achieve 165 and 181lux respectively which is a very good level of daylight. As mentioned, the BRE guide does acknowledge that where kitchens could be susceptible to lower levels of daylight, they should be linked to well lit living spaces as is the case here with R18 at floors seven and eight well exceeding the 150lux target.

6.14.36 The principle is the same for the two KD's which fall below the targets located on the same floors. Here, the rooms (R1) achieve 137 and 127lux and are linked to dual aspect living spaces which achieve lux values in excess of 700lux.

6.14.37 In terms of sunlight, 49 of the 59 units in Block F will meet or exceed the sunlight target which is an excellent level of compliance and particularly when considering that the south facing façade is partially constrained by the proximity to the latter development phasing.

6.14.38 The results for this block confirm that layouts and window placement has been carefully considered alongside other site constraints to provide residents with excellent levels of amenity.

Block F Duplexes

Room	No. of rooms assessed	Rooms meeting target
Bedroom	8	6
KD	2	2
Living Room	2	1
Total	12	9 (75%)

Table 10 - Block F duplexes summary results

6.14.39 These two duplexes are located on the lower floors of Block F, one on each side of the building facing east and west. Natural site constraints which are not unique to this scenario mean that inevitably the rooms on the lowest floors will be more

constrained particularly when considering the impact that balconies and overhangs may have on the units below.

6.14.40 Despite some rooms falling below the targets the lux levels are otherwise reasonably good given the constraints outlined above. Six of the eight bedrooms will meet the targets with the two rooms falling below both located in the southwestern corner. achieving 81 and 52 lux respectively. The single living room which falls below the target serves the southeastern duplex and achieves 63lux and also benefits from access onto the private amenity space within the communal courtyard area.

6.14.41 In terms of sunlight, both duplexes will meet the target indicating the siting of these units has been carefully considered to optimise internal amenity.

Terraced Houses

Room	No. of rooms assessed	Rooms meeting target
Bedroom	30	30
KD	10	10
Living Room	10	10
Total	50	50 (100%)

Table 11 - Terraced houses, summary results

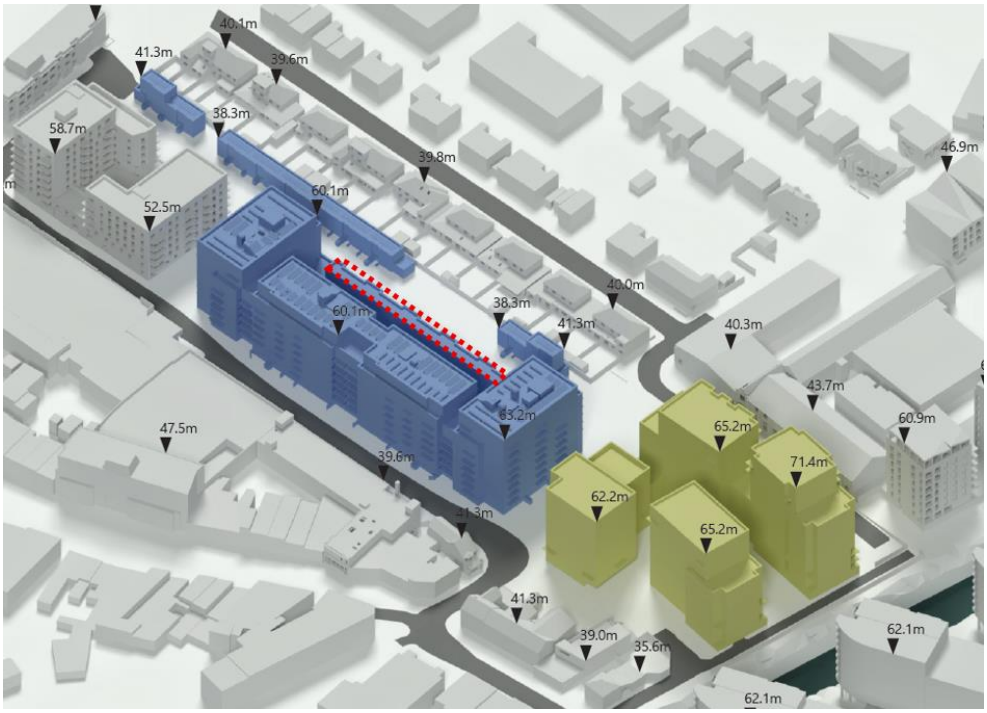

Image 28 - Terraced Houses

6.14.42 This row of terraced houses is located to the east of Block D & E. The living arrangements are split between a kitchen diner a separate living room alongside 3 bedrooms in each of the properties.

6.14.43 All of the rooms within these units will meet or exceed the respective BRE targets for daylight illuminance.

6.14.44 In terms of sunlight, every room within each of the houses will meet the sun lighting target indicating a very high level of internal compliance and amenity.

7 Conclusions

7.1.1 This practice has undertaken detailed assessments of the provision of daylight and sunlight within neighbouring residential properties, the overshadowing within the external amenity spaces, and the provision of daylight within the proposed scheme, in support of the Reserved Matters application for the Hayes Town Centre Estate regeneration.

7.1 Daylight and sunlight impacts to neighbours

7.1.1 The daylight and sunlight analysis for the proposed redevelopment of the Hayes Town Centre Estate has been undertaken in accordance with the methodologies set out in the Building Research Establishment (BRE) Guidelines. The assessment compares the proposed massing of the S73 illustrative masterplan alongside the RMA scheme for phases 2&3 and the cumulative impacts of the future phases in accordance with Appendix F of the BRE guidelines. As set out in the BRE guidelines the use of alternative daylight targets is recognised to ensure that proposed amenity levels are consistent with neighbouring developments within the area.

7.1.2 The results show that changes in Vertical Sky Component (VSC) are generally limited, with most windows and rooms experiencing negligible differences and mostly modest improvements in daylight availability.

7.1.3 Across the development, the retained VSC, No-Skyline (NSL), and Annual Probable Sunlight Hours (APSH) values indicate a broadly positive outcome, reflecting that the revised massing does not materially worsen daylight conditions when compared with the illustrative massing submitted with the S73 scheme.

7.1.4 Where small reductions are observed, these fall well within the parameters of acceptability for an urban location and represent a proportionate and reasonable trade-off necessary to enable efficient and balanced site development. The overall results confirm that the proposed design achieves an appropriate relationship with neighbouring properties and should therefore be regarded as compliant with the relevant daylight and sunlight guidance and acceptable in planning terms.

7.1.5 As part of the analysis, we have also considered the interim scenario of the delivery of phases 2&3 and retention of Skeffington House to the south of the proposals where phase 4 will eventually come forward. The VSC façade assessment confirms the north facing windows within Skeffington House will comfortably meet the BRE targets for VSC.

7.2 Overshadowing / sunlight within the proposed amenity areas

7.2.1 The assessment of sunlight (overshadowing) within the proposed areas of shared amenity space have shown that the key communal amenity spaces we have considered will receive more than two hours of sunlight on 21st March and thereby exceed the BRE targets.

7.2.2 Furthermore, our sunlight exposure diagrams on this date illustrate that large areas of these spaces will also enjoy very good levels of direct sun.

7.2.3 The scheme therefore demonstrates very good compliance with the BRE guidelines in respect of sunlight / overshadowing to the external spaces and will enjoy good levels of sunlight throughout the year. Sunlight levels will only increase to the areas during the summer months when the spaces are likely to be used the most and the BRE recognises that sunlight is most important to sitting out / play areas.

7.2.4 As set out in the BRE guidelines, daylight and sunlight availability are just one of the many important factors in site layout design such that flexibility is appropriate in the application of the guidance. This is echoed in the NPPF 2024 and the London Housing Supplementary Planning Guidance 2016 which makes it clear that the efficient use of sites, particularly for housing, should not be hampered by such technical constraints.

7.2.5 Overall, the principles of the RMA proposals are considered to respond well to the constraints of the site and is considered to demonstrate appropriate levels of sunlight amenity for its context whilst maintaining the appropriate level of density.

7.2.6 The proposals are therefore considered to continue to be in line with the aspirations of the BRE guidelines and relevant planning policy in respect of daylight and sunlight.

7.3 Internal daylight and sunlight within the proposed scheme

7.3.1 The proposed accommodation achieves a daylight compliance level of 87%, which represents a very strong level of compliance given the spatial and contextual constraints of the site. The proposed built form and separation distances inevitably place some pressure on daylight access, particularly to lower-level units and those facing onto the neighbouring blocks.

7.3.2 Despite these constraints, the majority of rooms comfortably meet the recommended targets, demonstrating that the massing and internal layouts have been carefully arranged to maximise available daylight wherever possible.

7.3.3 The scheme has been designed with a clear emphasis on creating well-lit, usable living spaces. Window positions, room depths and internal orientations have been refined to optimise daylight penetration into the primary living areas, ensuring that the accommodation feels bright and functional throughout the day. Where minor shortfalls occur, they are limited, proportionate and directly attributable to unavoidable urban constraints rather than design inefficiency.

7.3.4 The analysis shows that daylight has been prioritised to the primary living areas, with key living spaces positioned to maximise access to natural light. Where deeper plan living, kitchen and dining areas are proposed, kitchens are located to the rear and benefit from additional task lighting to support functionality and day-to-day use. The secondary analysis showing daylight levels with these kitchens notionally removed further supports this.

7.3.5 This level of compliance alongside delivering the required housing density reflects an effective balance between optimising the site and maintaining good residential quality. In a constrained urban location, full compliance is rarely achievable without compromising essential spatial efficiency or the wider policy objectives for housing delivery.

7.3.6 The proposals demonstrate that it is possible to accommodate the desired number of homes and still deliver a well-designed scheme. The resulting accommodation will offer appropriate daylight levels in line with planning expectations and contribute positively to the local housing mix.

7.3.7 As part of this analysis we have also considered future daylighting levels to phase 4. The purpose of this analysis to ensure that the location of the massing at the southern end of phases 2&3 (Block F) will not be detrimental to future daylighting levels within the northern facades of phase 4.

7.3.8 The results of this assessment confirms that expectant daylight levels within the northern part of phase 4 will remain generally above the 27% VSC target confirming that despite the relatively close relationship between Block F and phase 4, good daylight levels will deliverable. Deviations from potential internal daylighting targets will be entirely consistent with multi-phase, flatted developments and good levels of internal amenity will remain eminently achievable.

7.3.9 Overall, the proposals are considered to respond well to the constraints of the site and is considered to demonstrate appropriate levels of daylight / sunlight amenity for its context whilst delivering a high-quality living accommodation for the future residents.

7.3.10 The proposals are therefore considered to continue to be in line with the aspirations of the BRE guidelines and relevant planning policy in respect of daylight and sunlight amenity.

Appendix 1

Drawings of the existing, S73 illustrative masterplan, proposed and surrounding buildings

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NORTH

Key

- Existing Building
- Surrounding Context
- Proposed Development

Project: Hayes Town Central Estate

Title: Existing Condition Plan View

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- Proposed Development

Project: Hayes Town Central Estate

Title: Existing Condition 3D View

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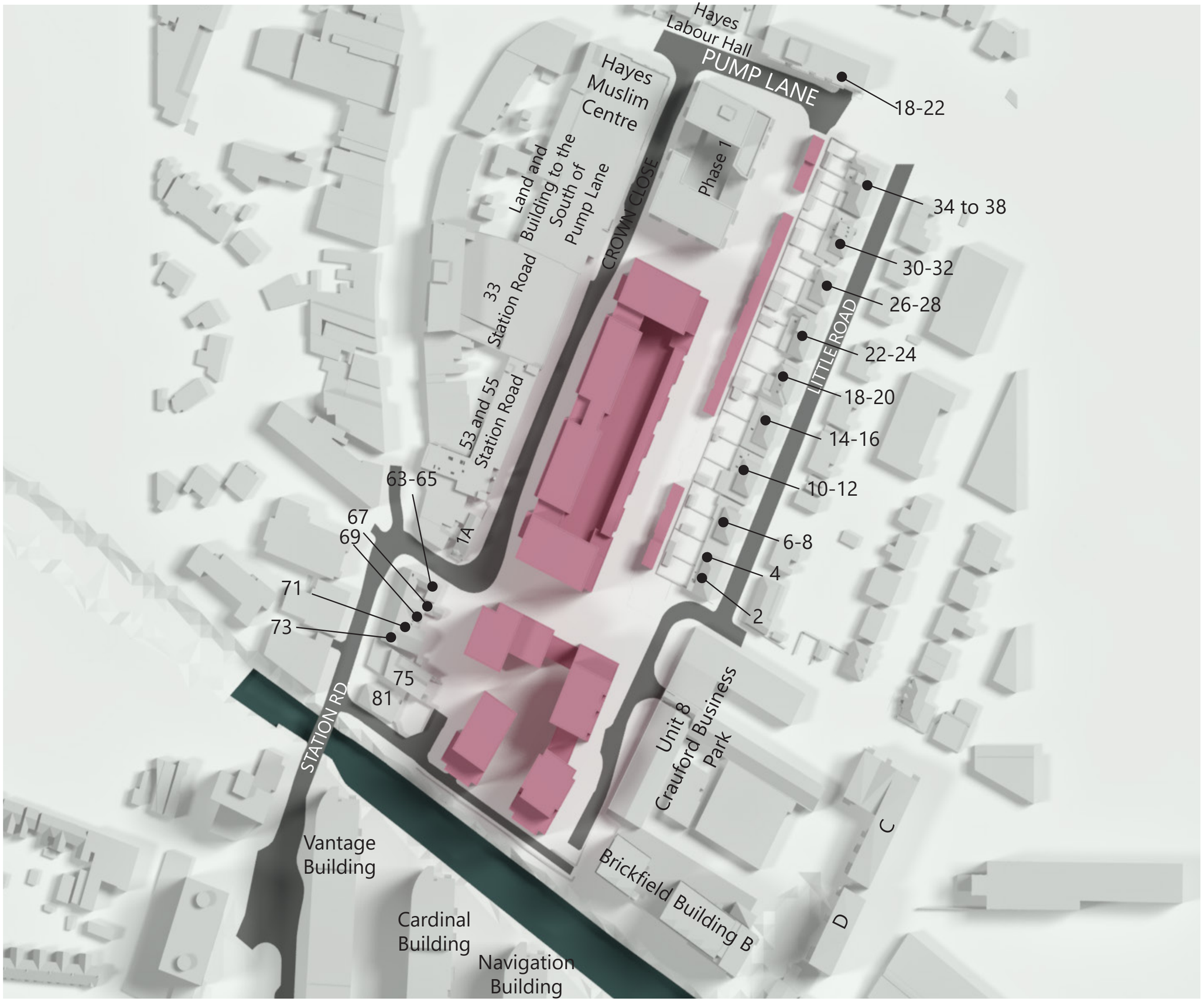

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- Consented Development
- Surrounding Context
- Proposed Development

Project: Hayes Town Central Estate

Title: Consented Scheme Plan View

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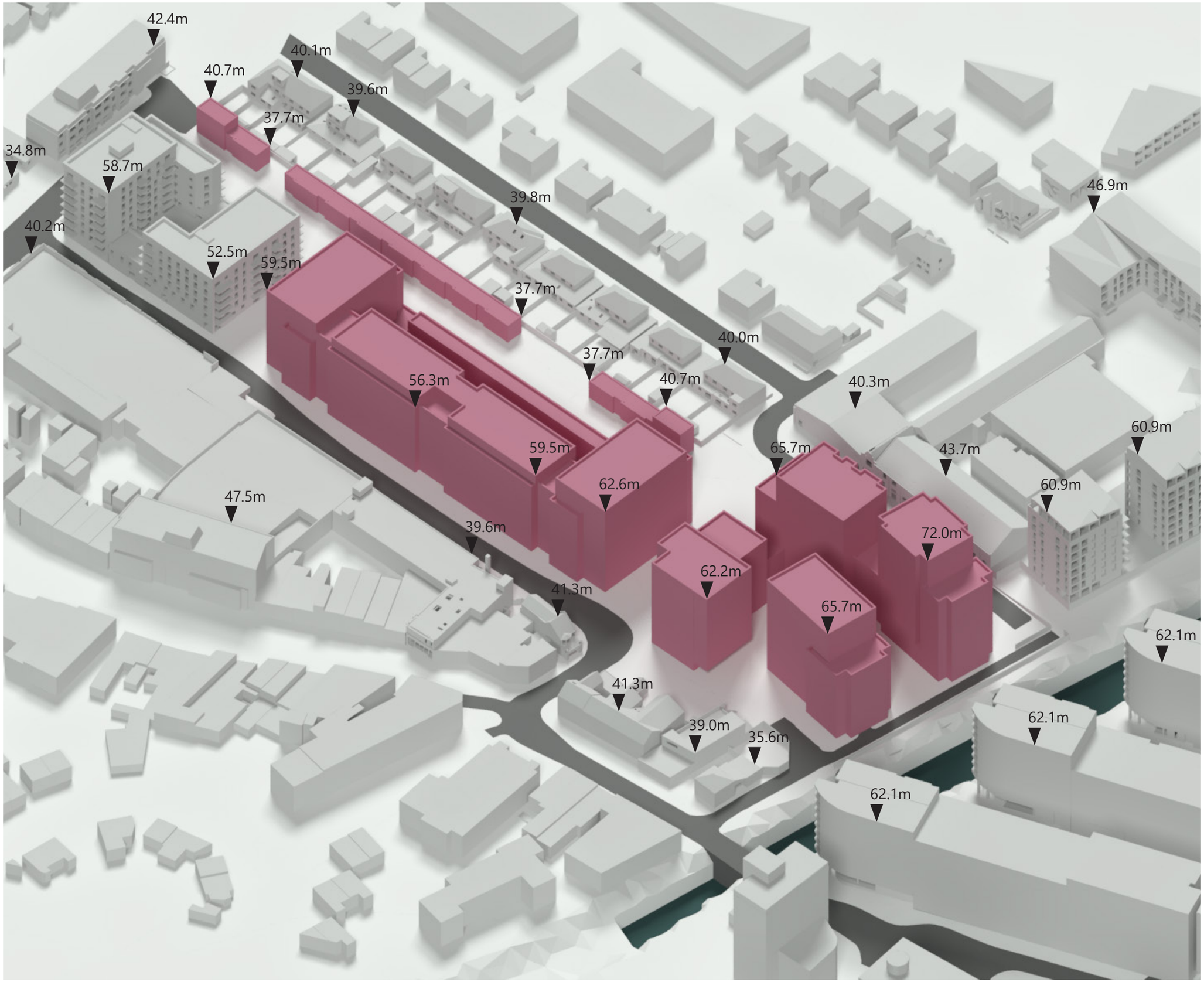

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- Surrounding Context
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Project: Hayes Town Central Estate

Title: Consented Scheme
3D View

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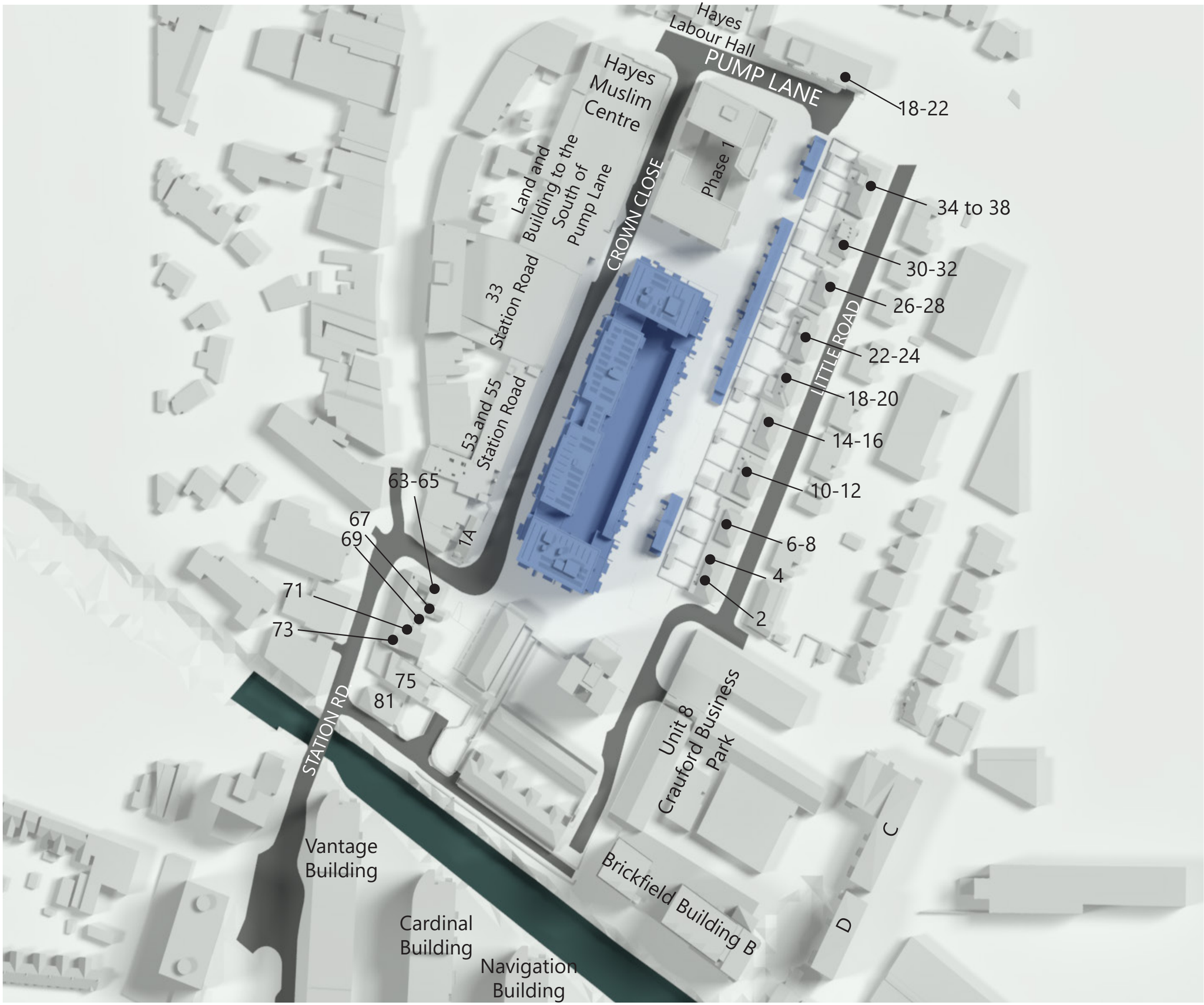

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Key

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- Surrounding Context
- Proposed Development

Project: Hayes Town Central Estate

Title: Proposed Development
RMA scheme
Plan View

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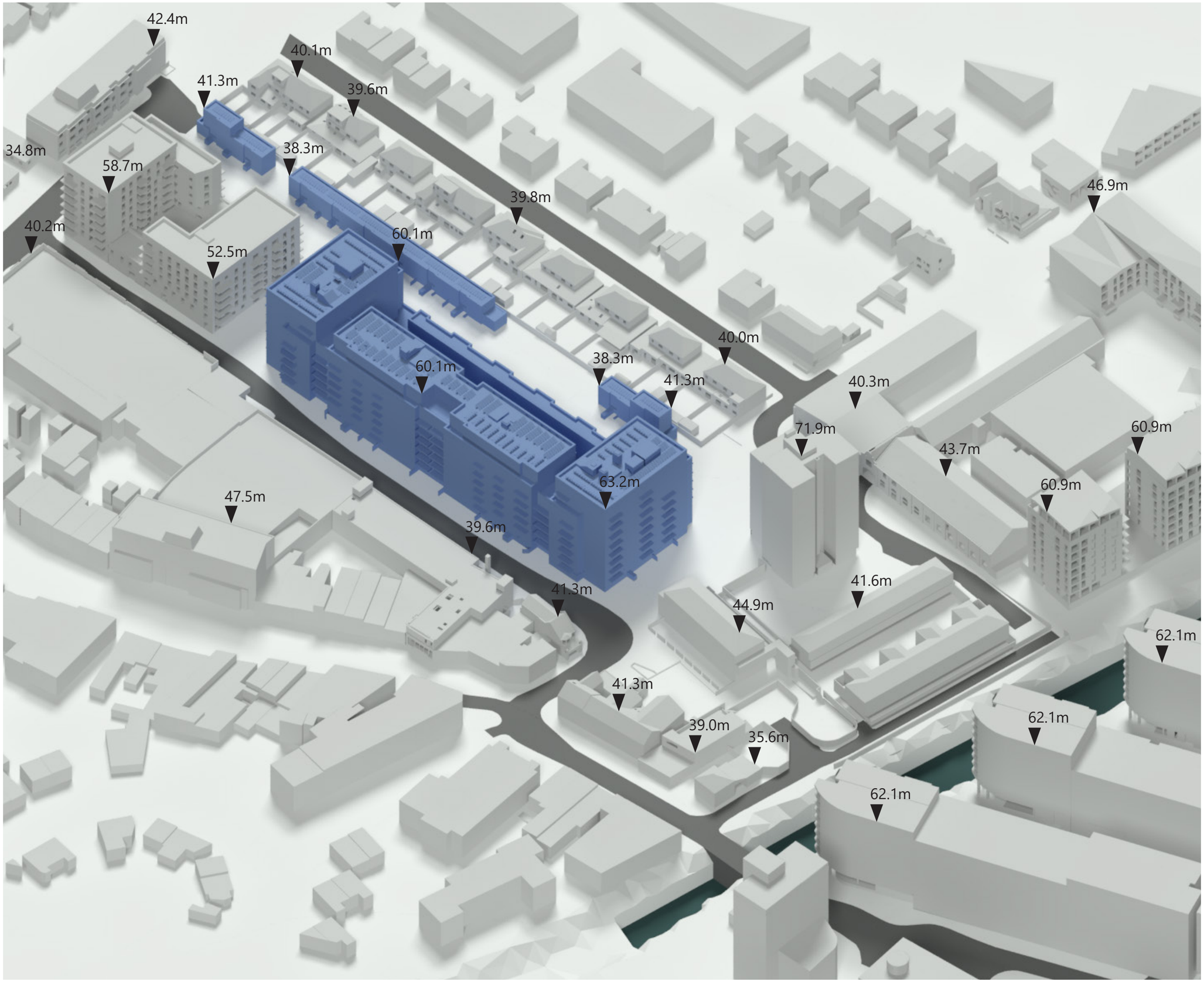

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Title: Proposed Development
RMA scheme
3D View

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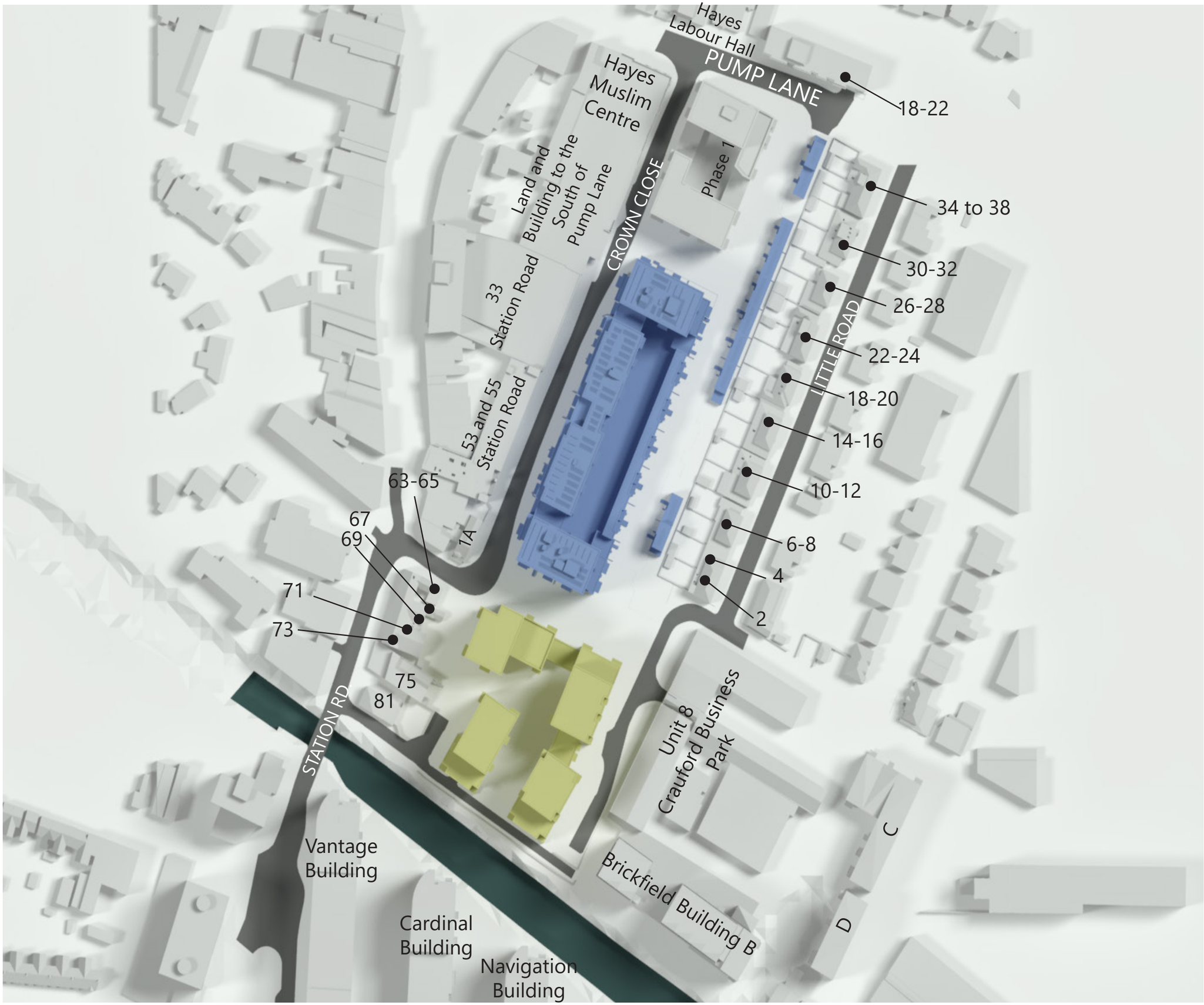

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NORTH

Key

- Cumulative Building
- Surrounding Context
- Proposed Development

Project: Hayes Town Central Estate

Title: Proposed Development Illustrative Scheme Plan View

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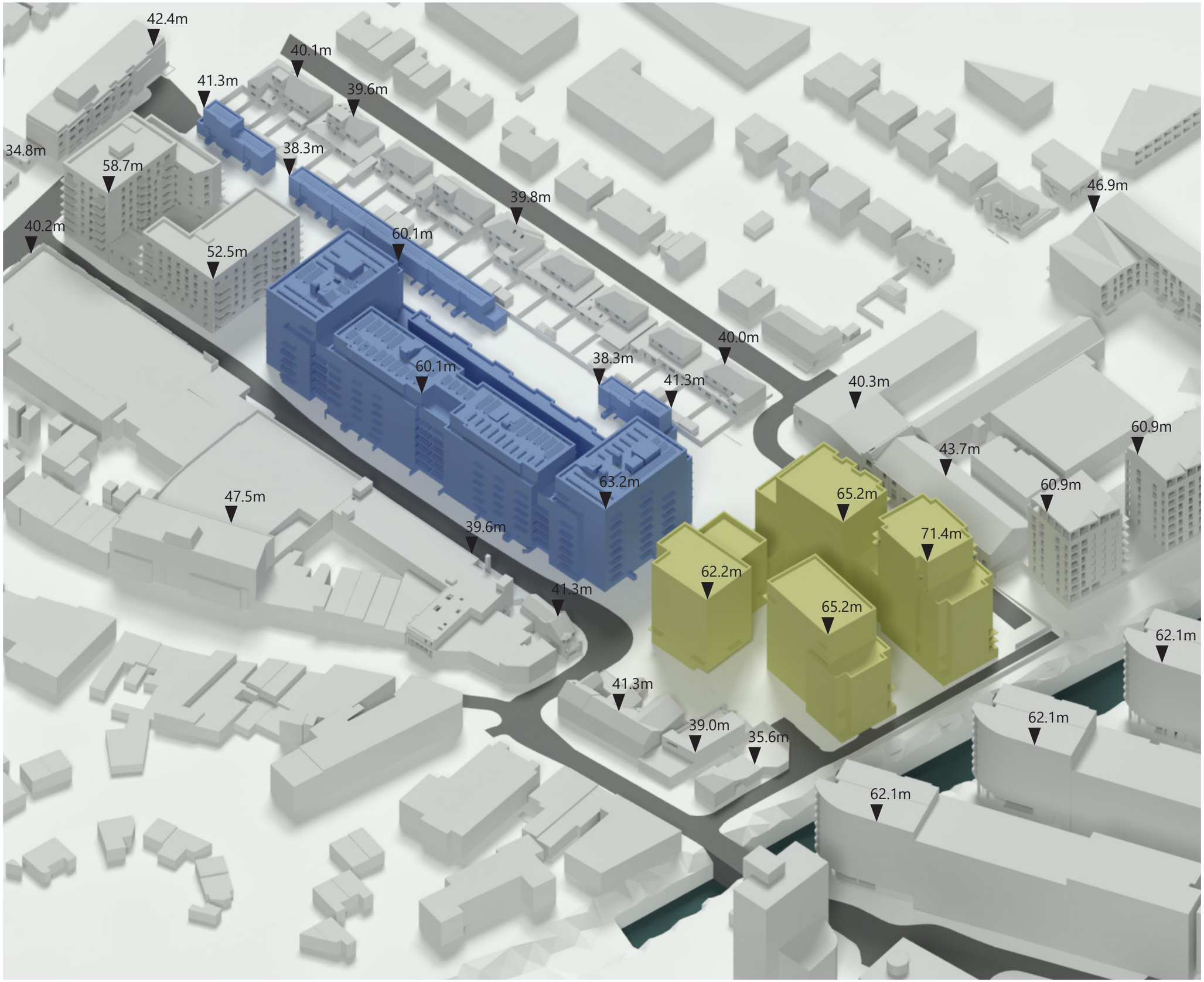

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Key
- Cumulative Building
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- Proposed Development

Project: Hayes Town Central Estate

Title: Proposed Development
Illustrative Scheme
3D View

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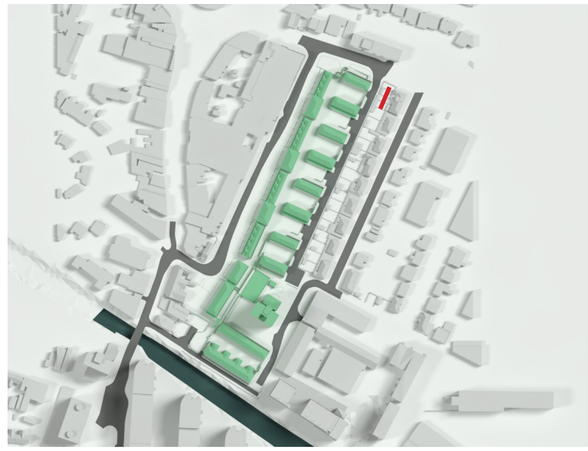

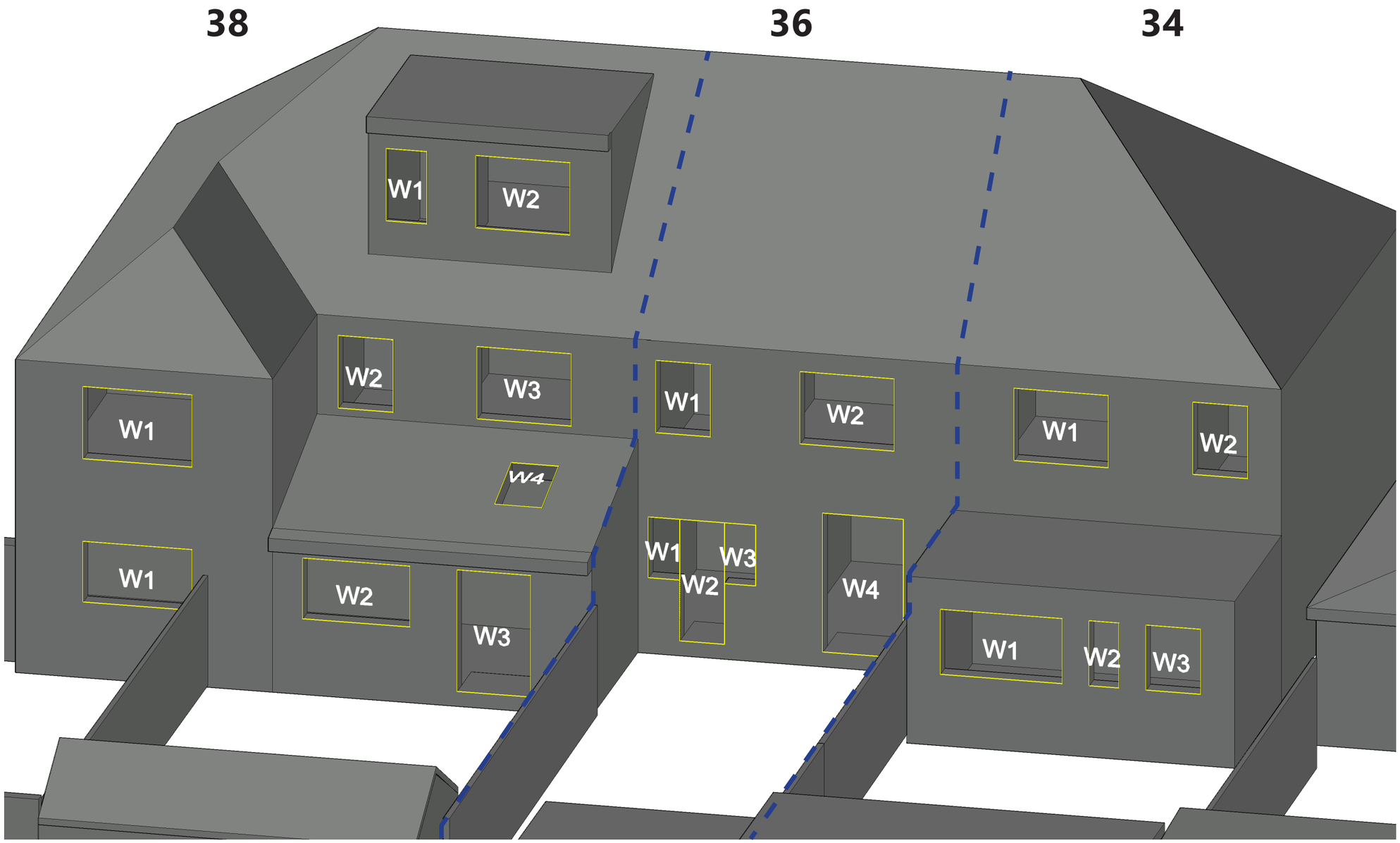

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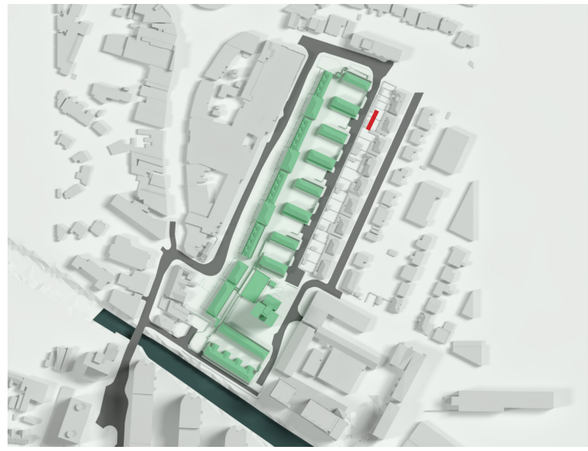

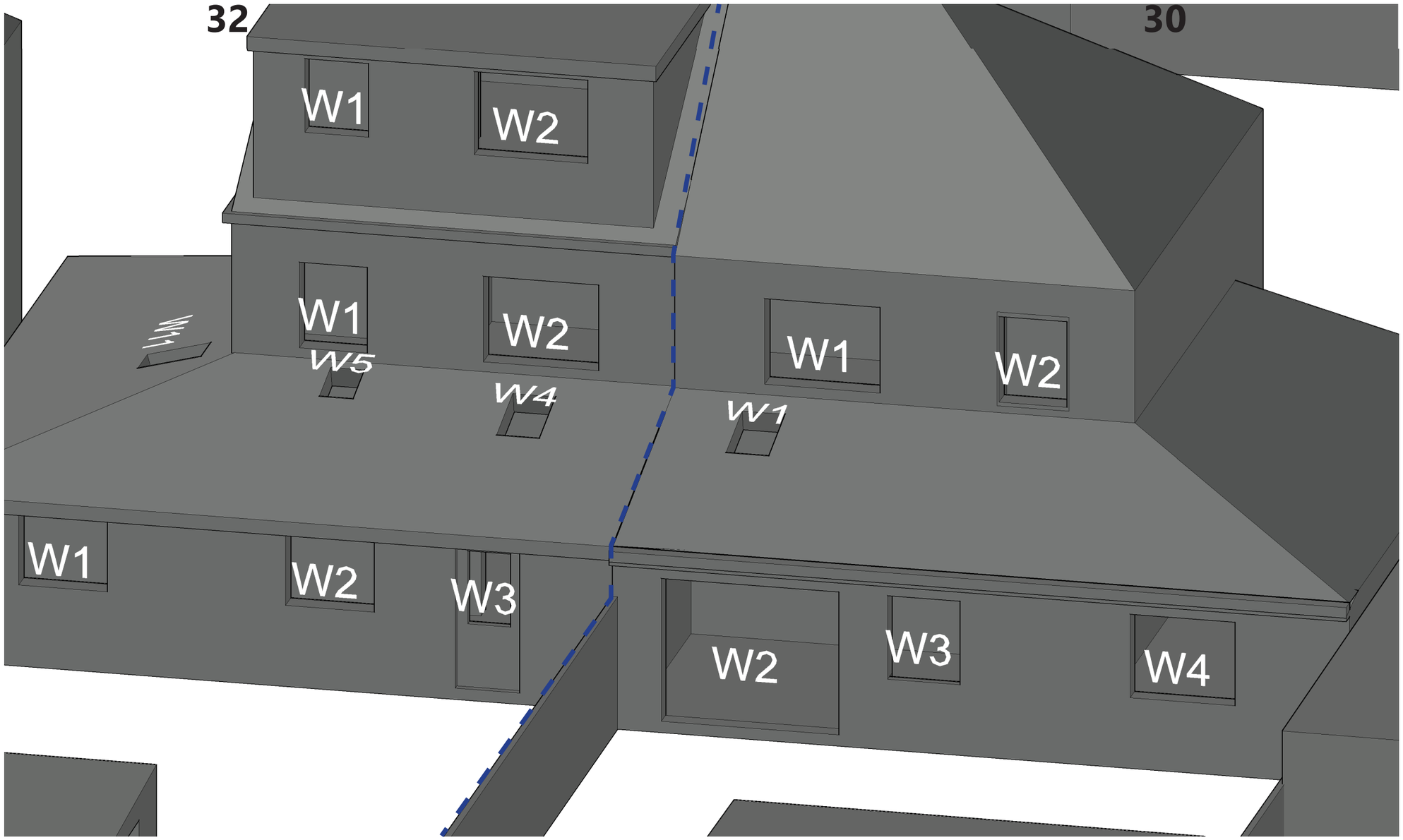

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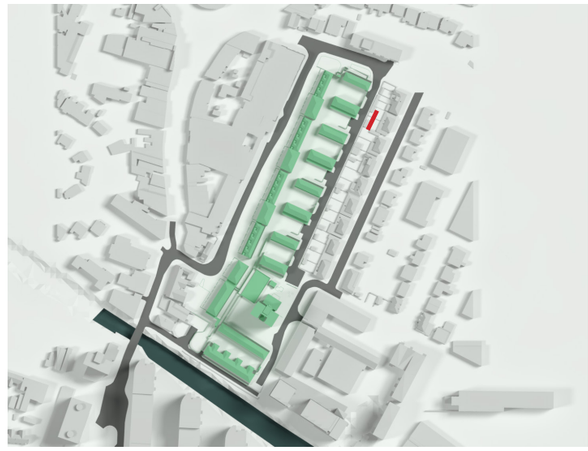

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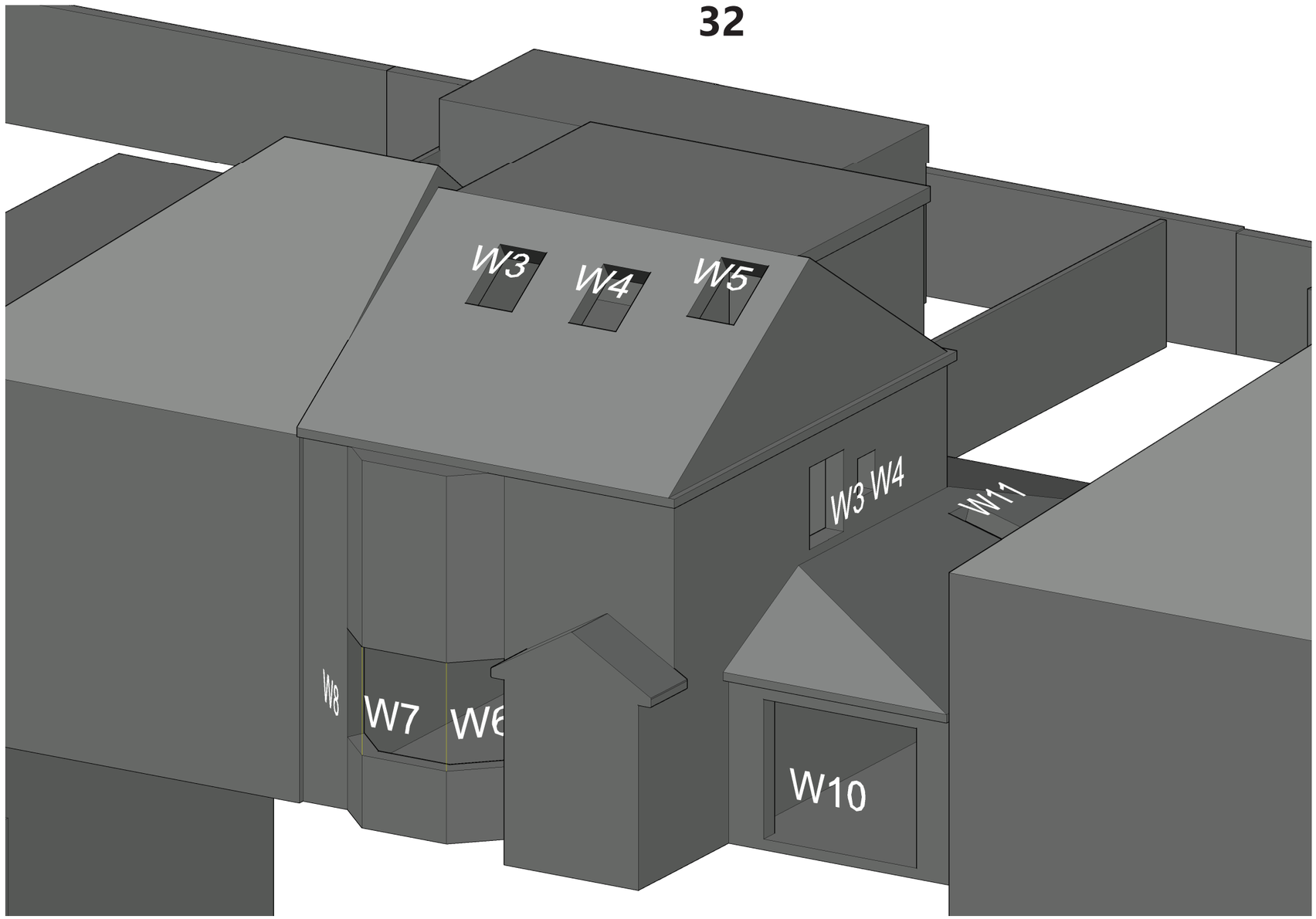

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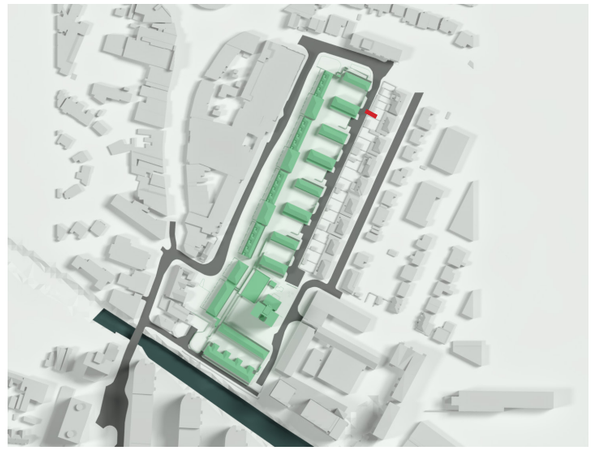

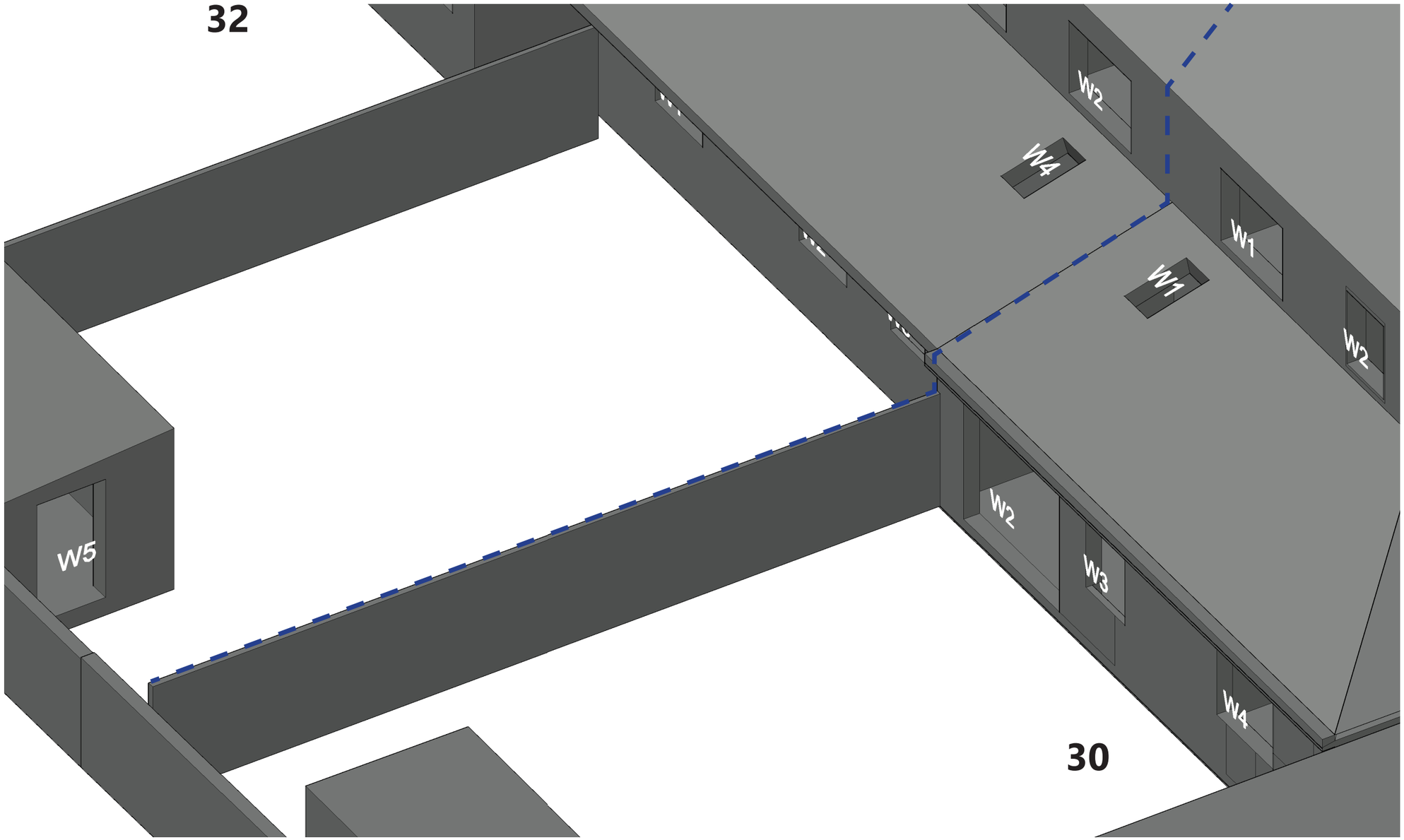

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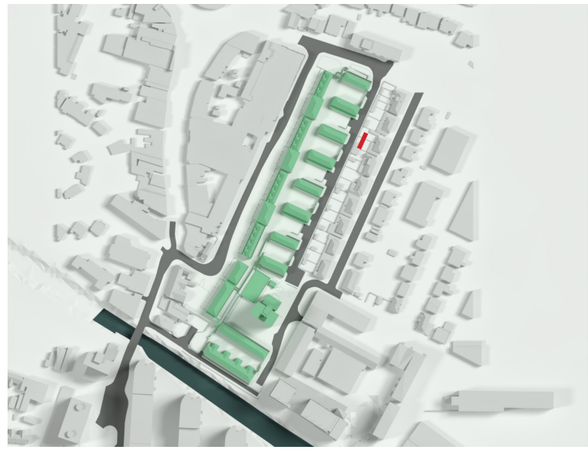

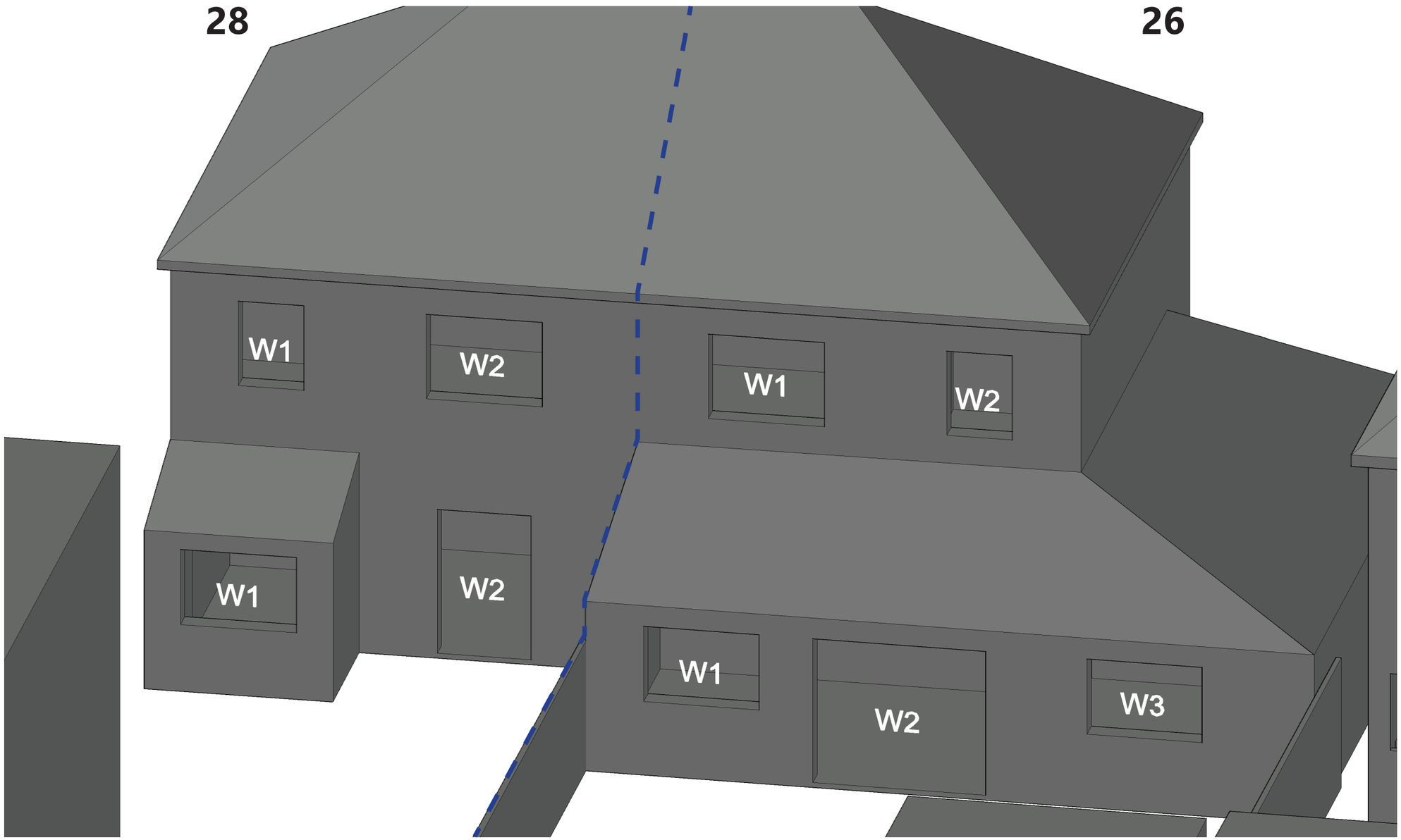

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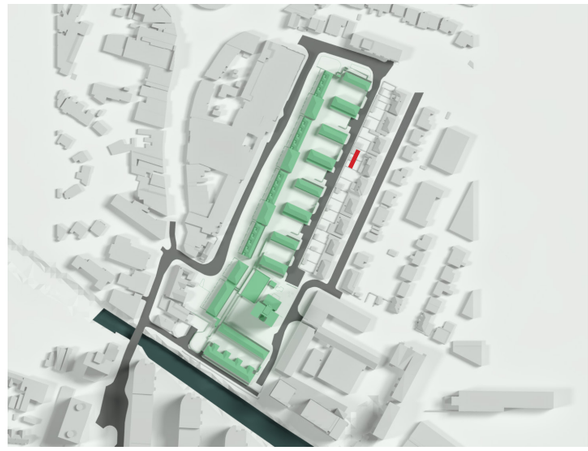

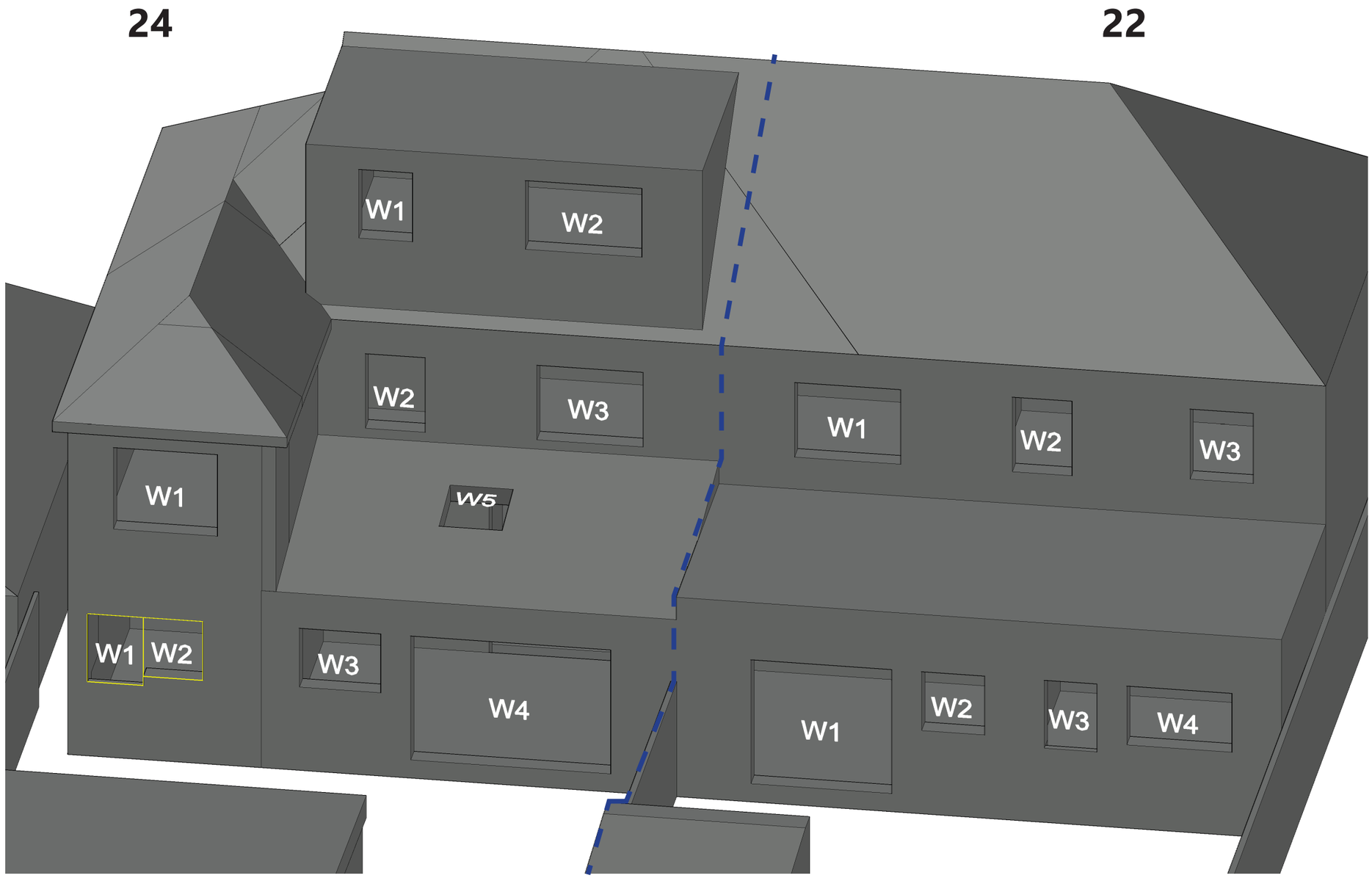

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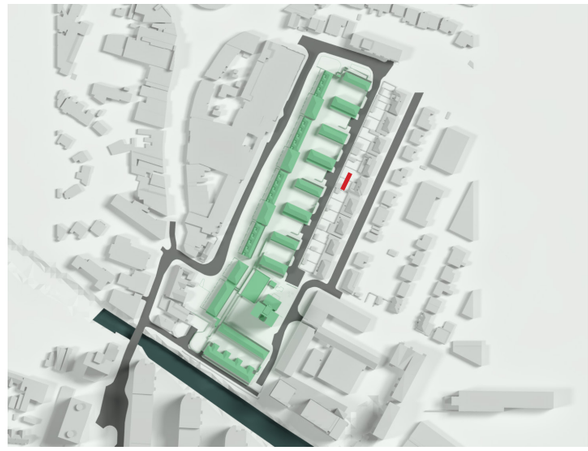

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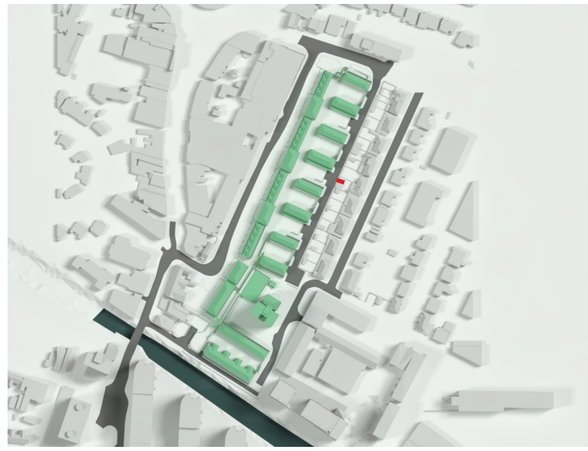

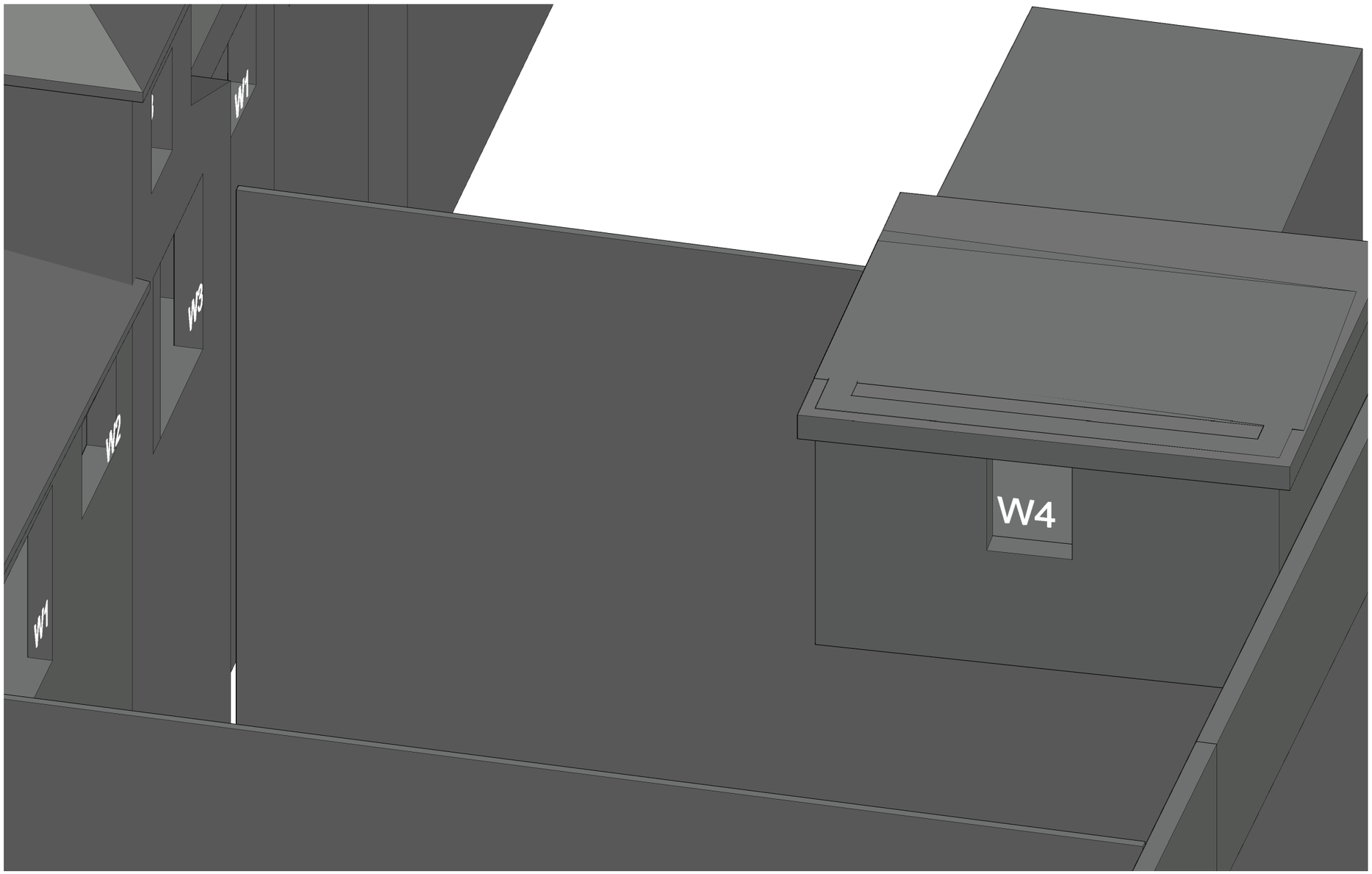

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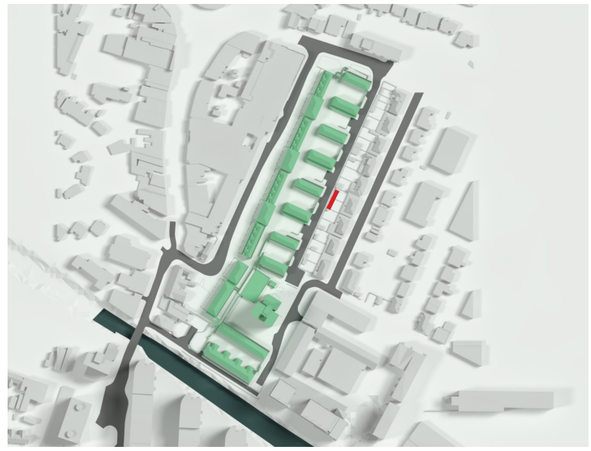

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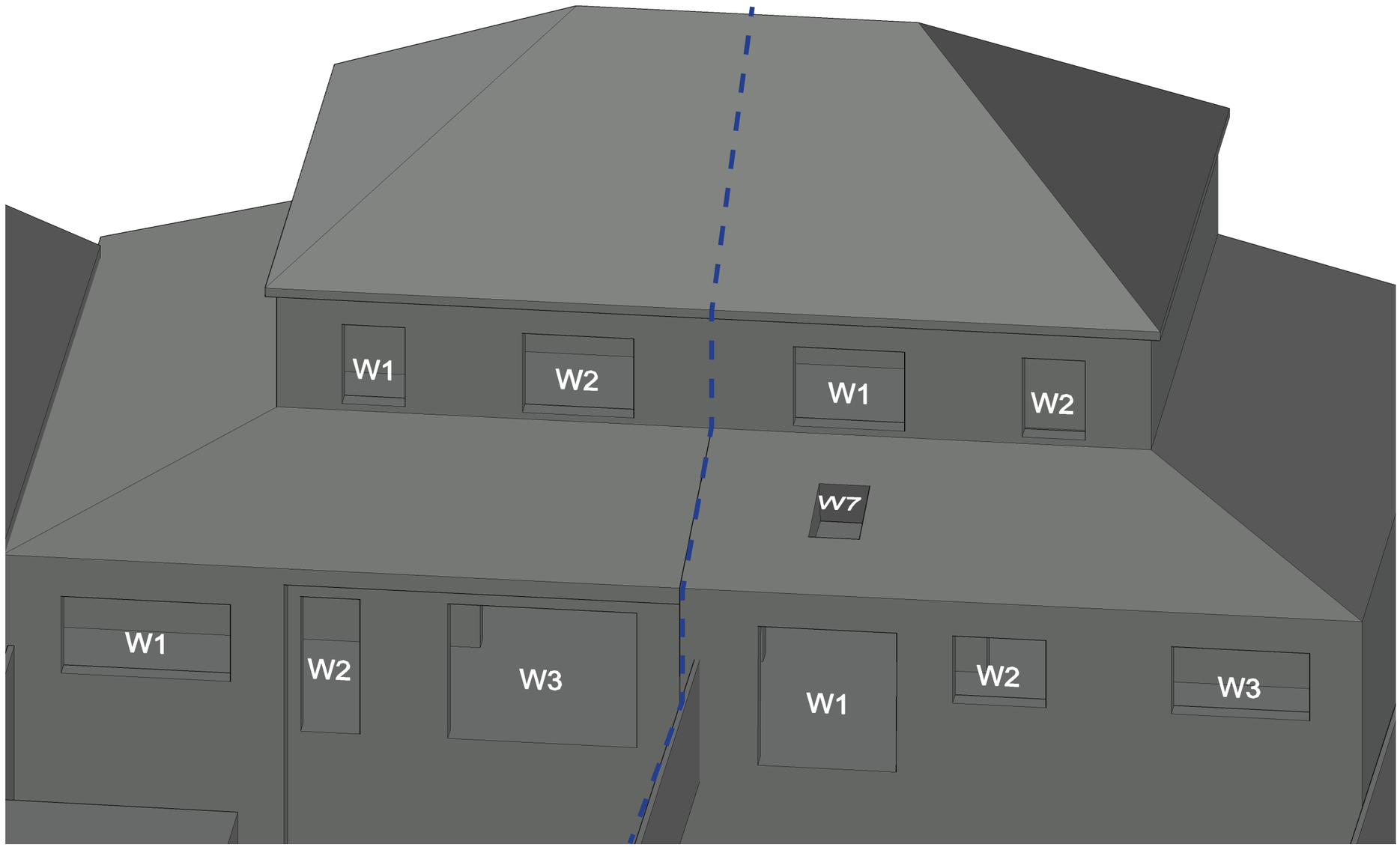

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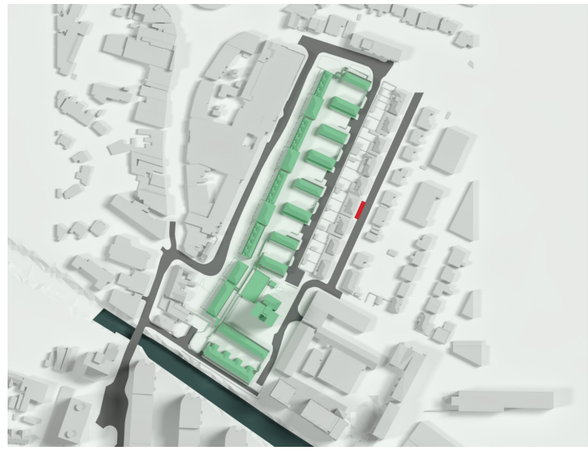

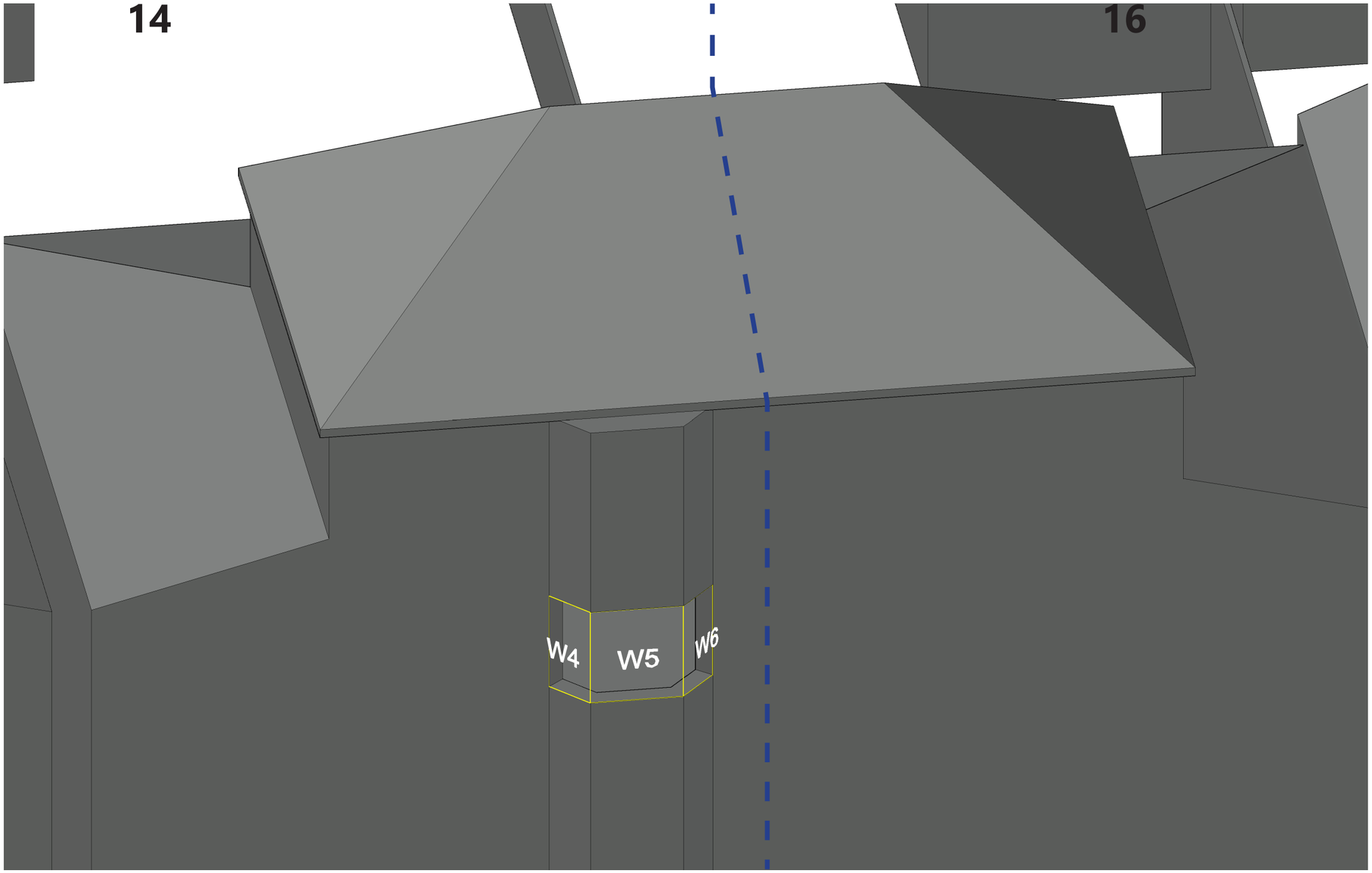

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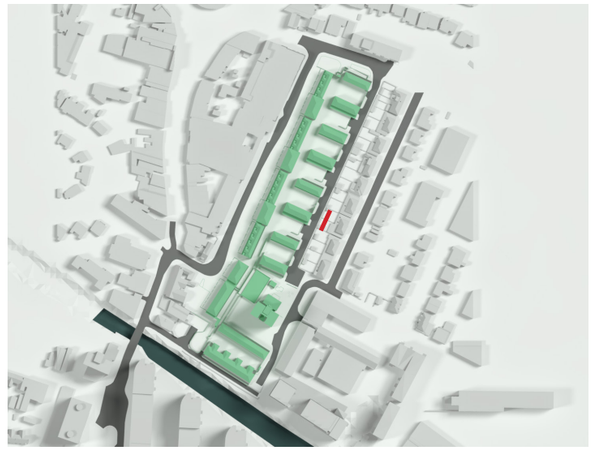

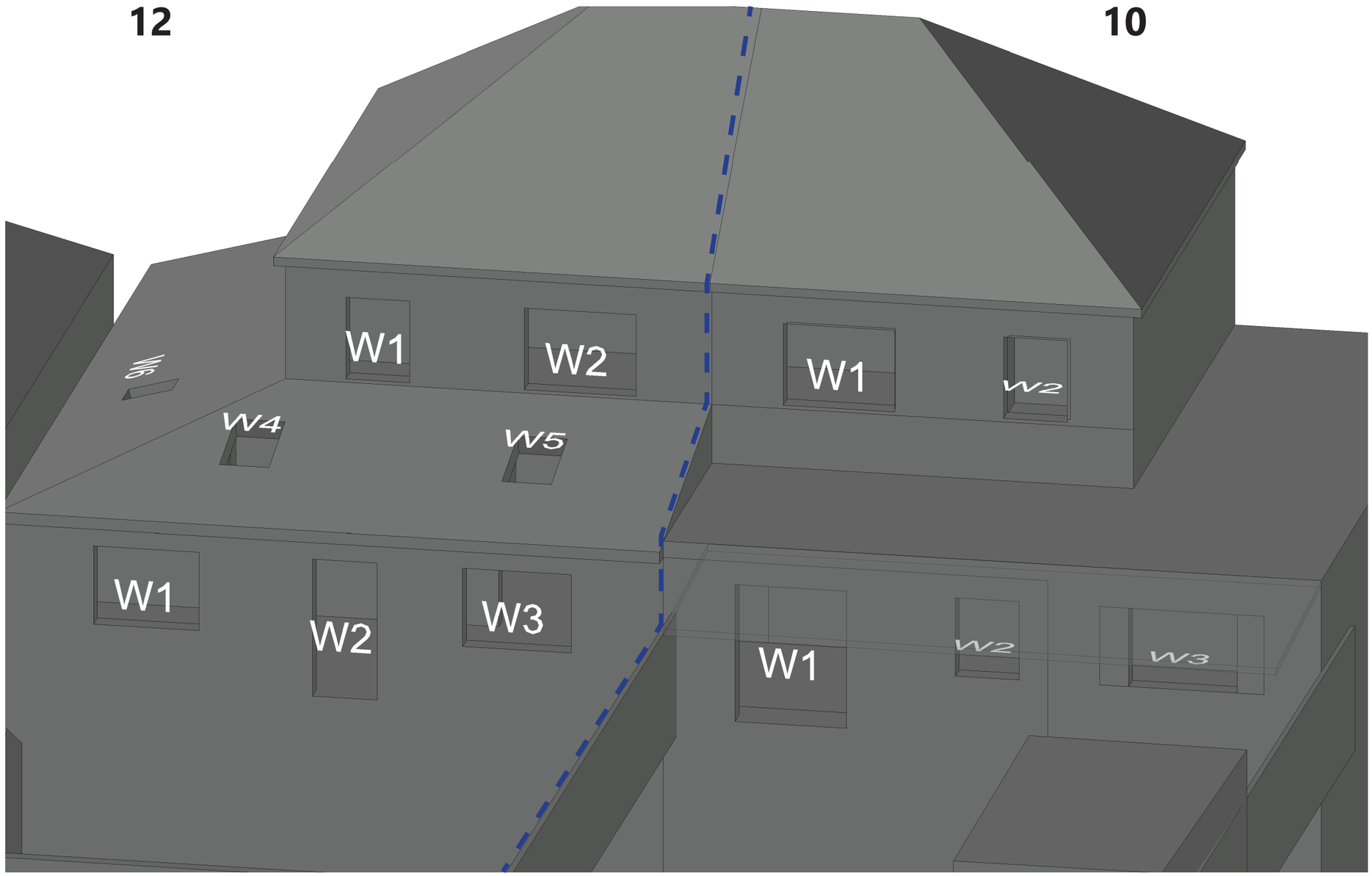

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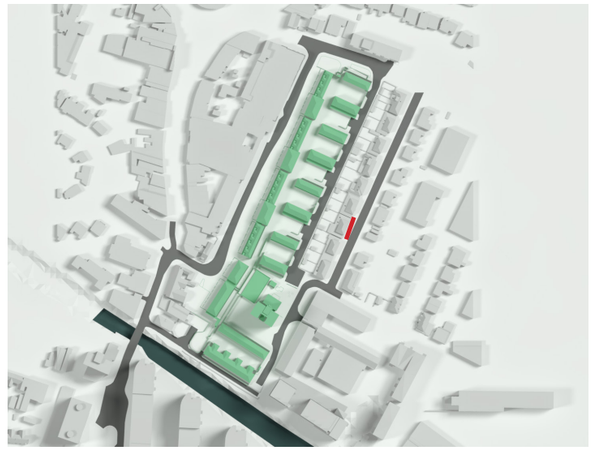

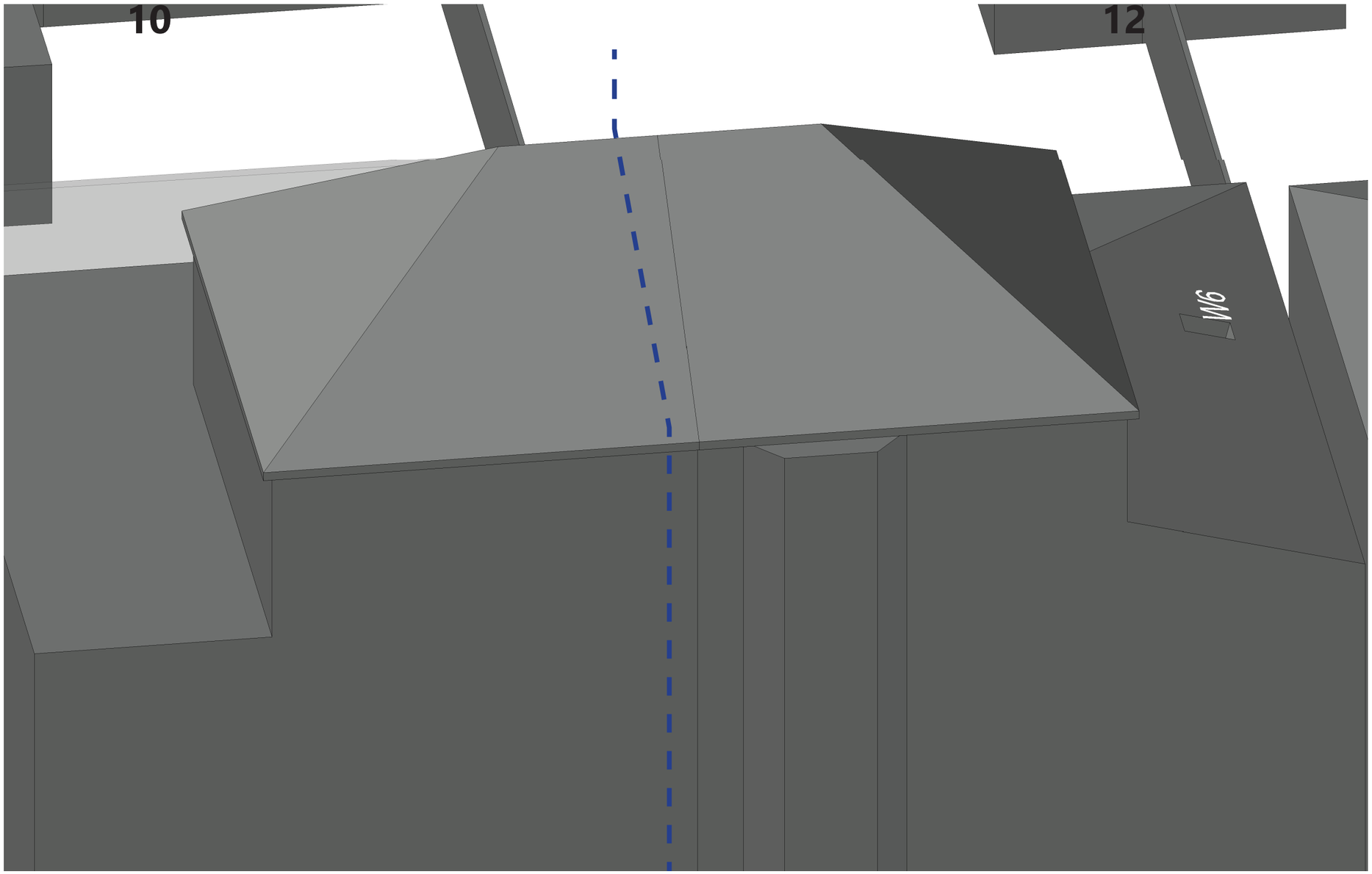

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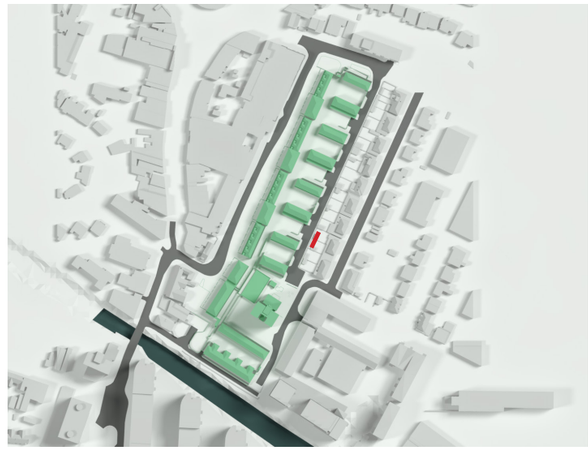

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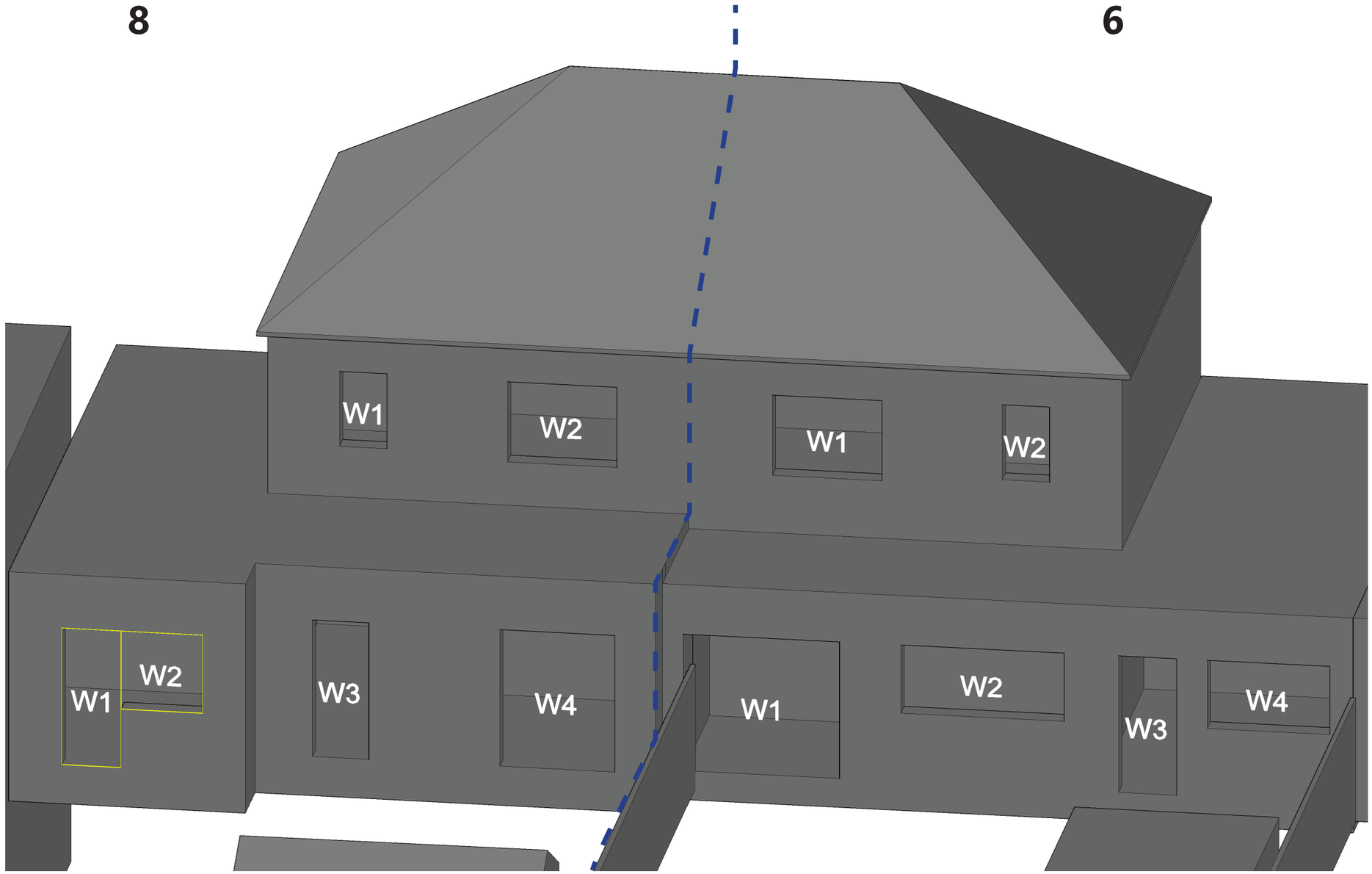

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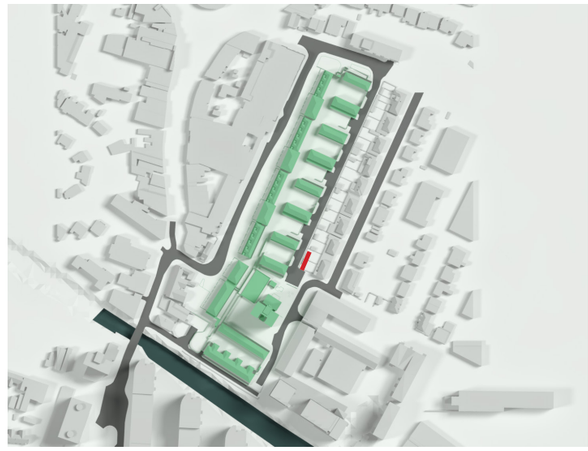

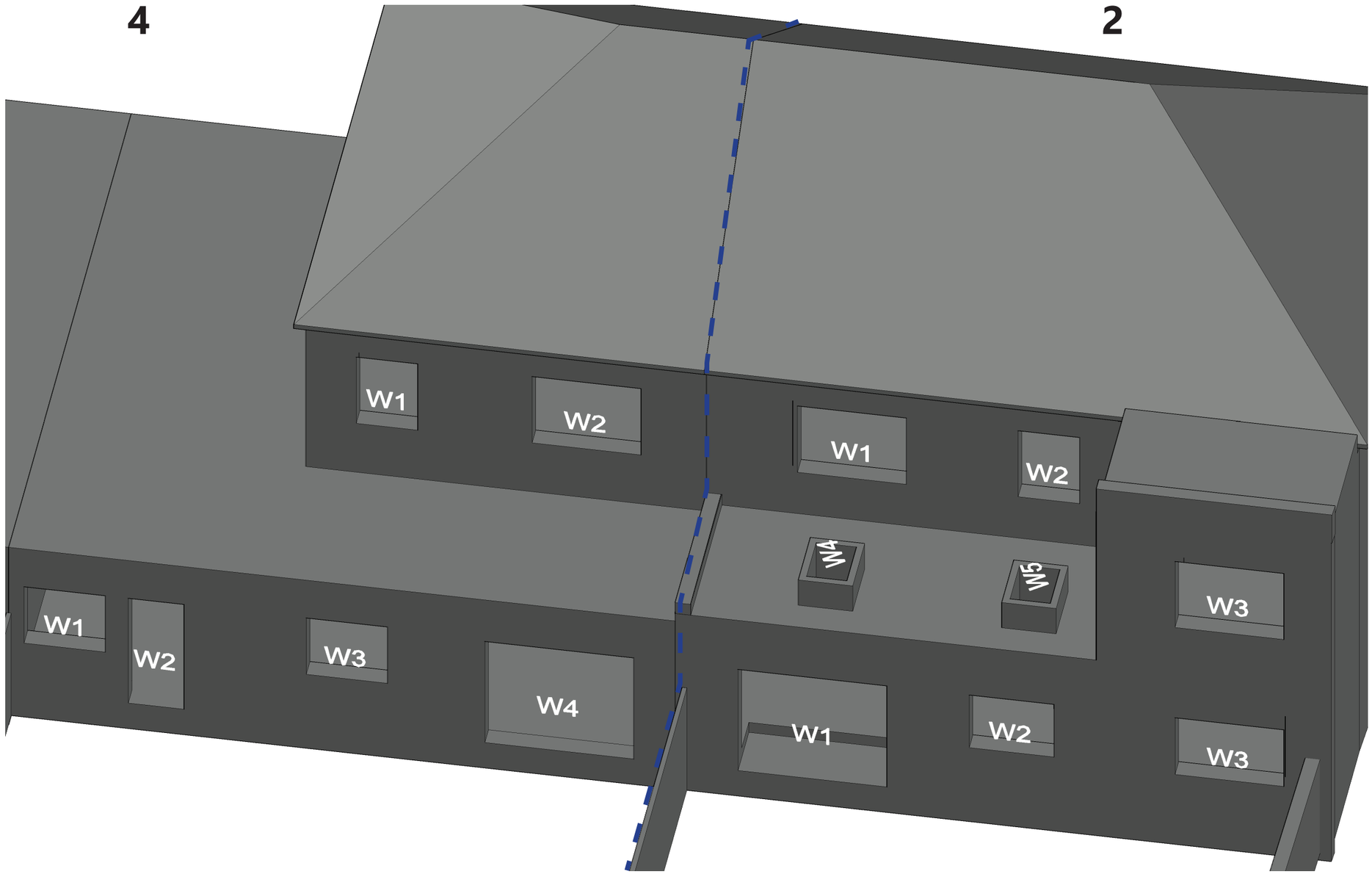

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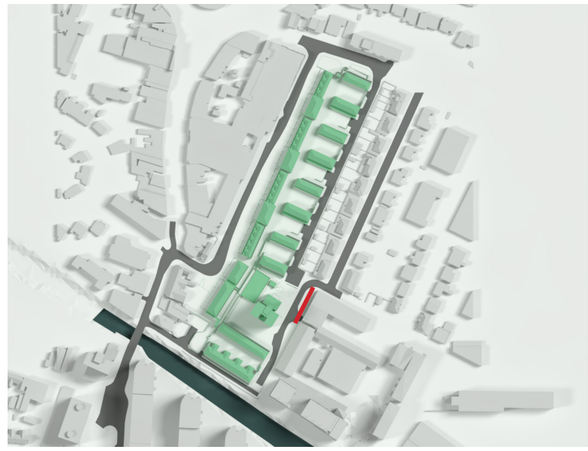

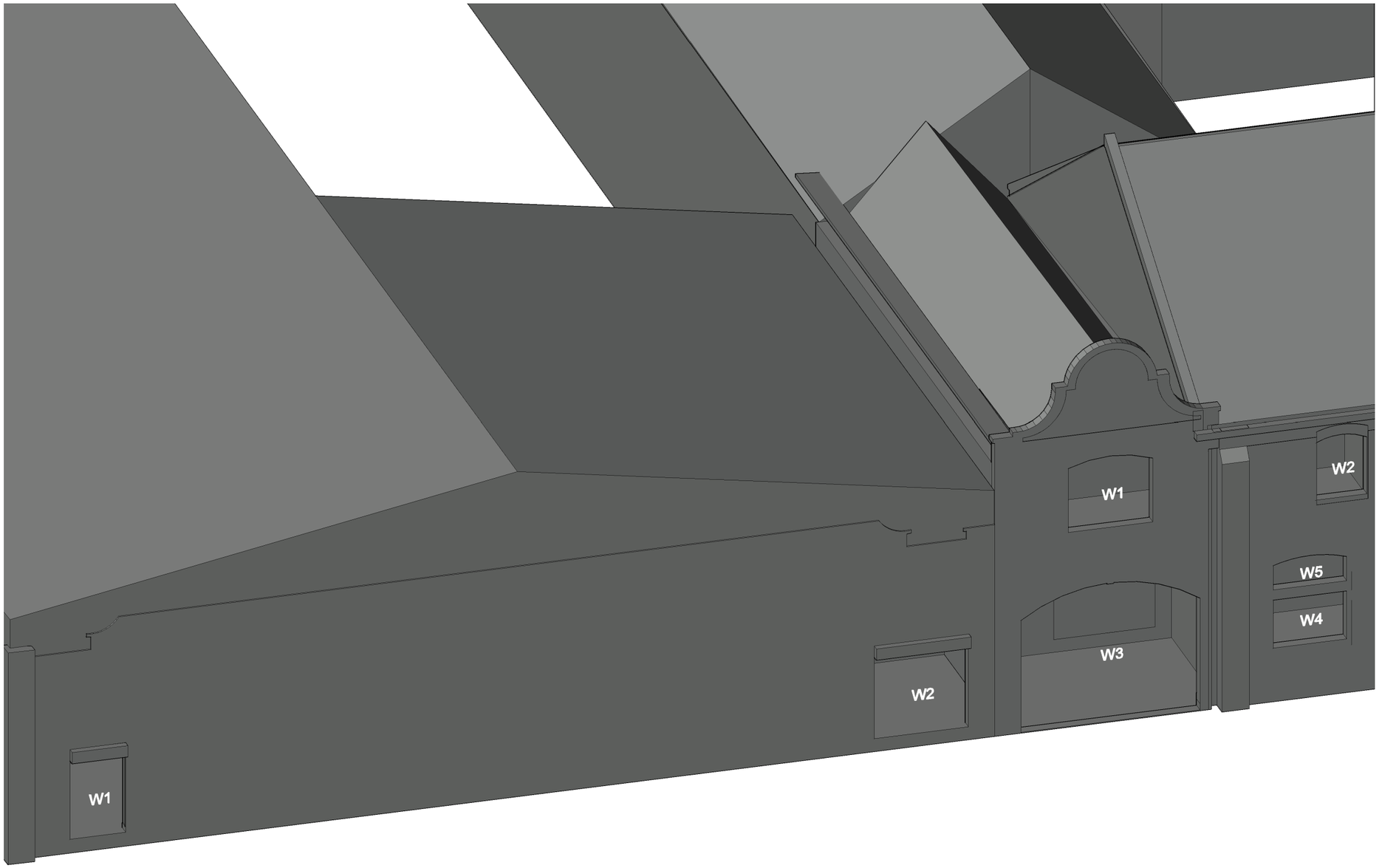

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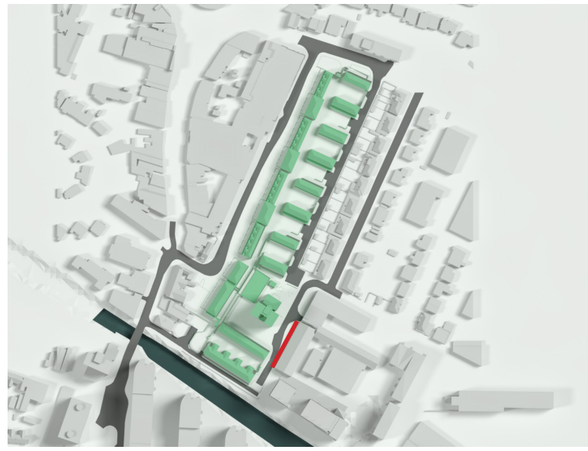

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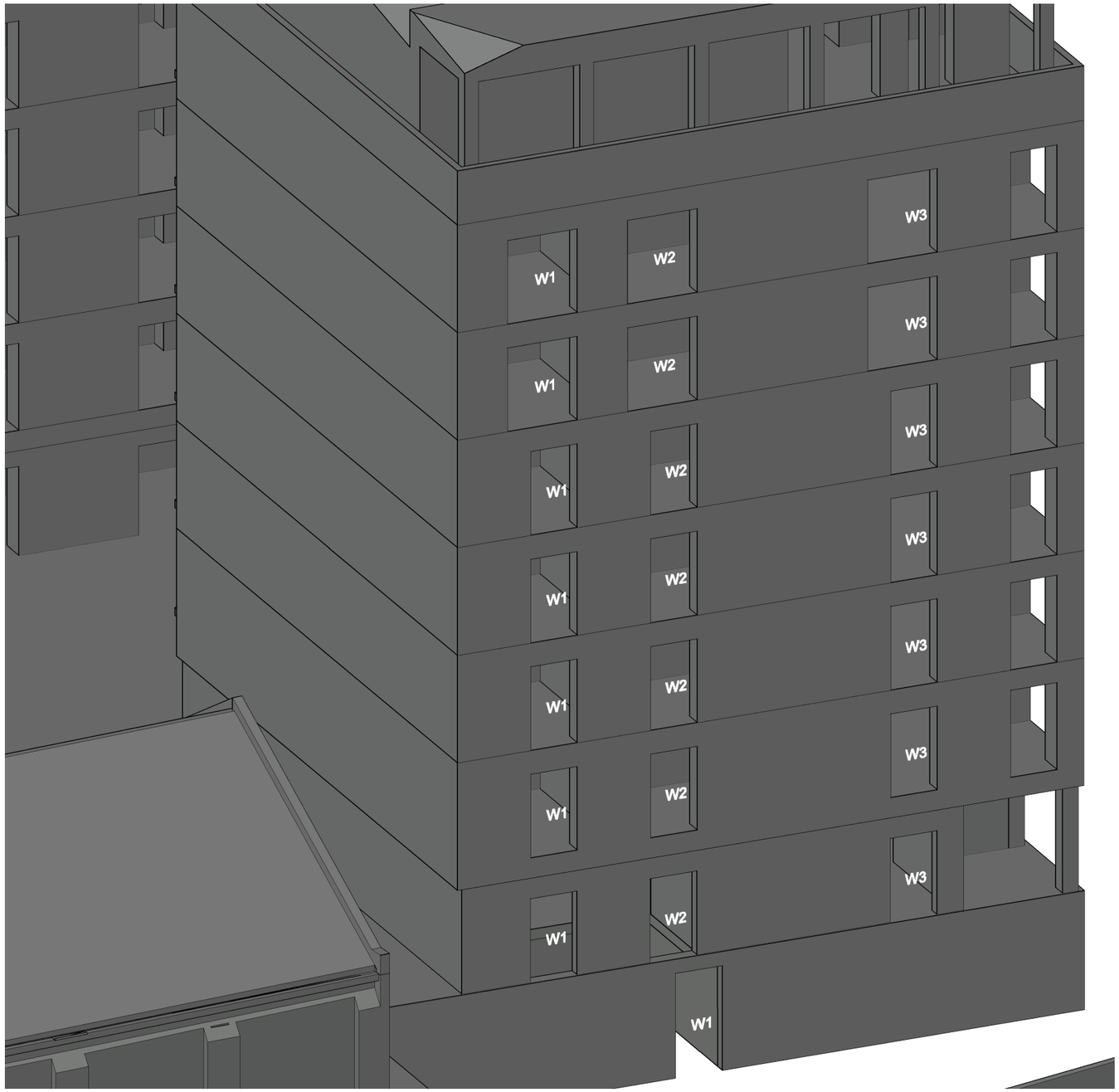

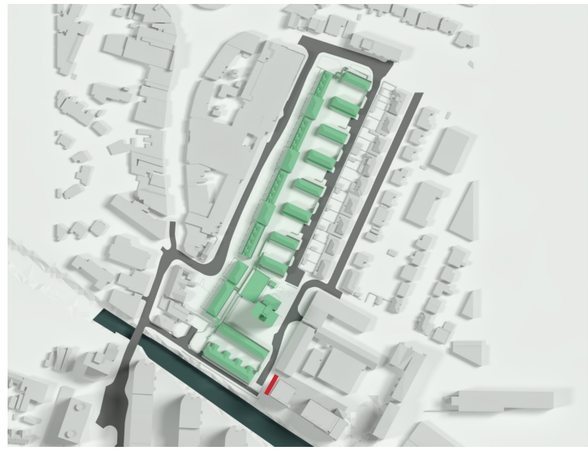

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Project: Hayes Town Central Estate
London

Title: Brickfield Building
Window Map

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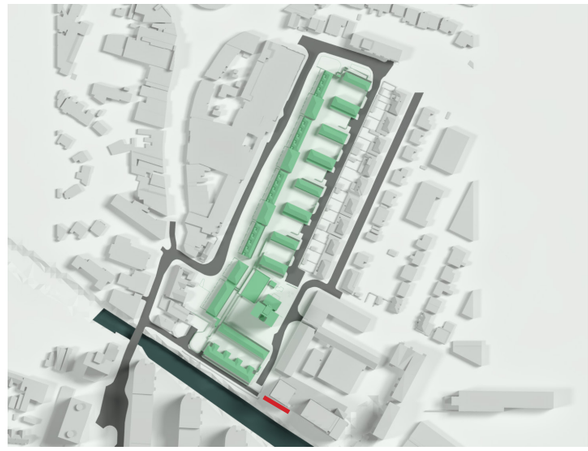

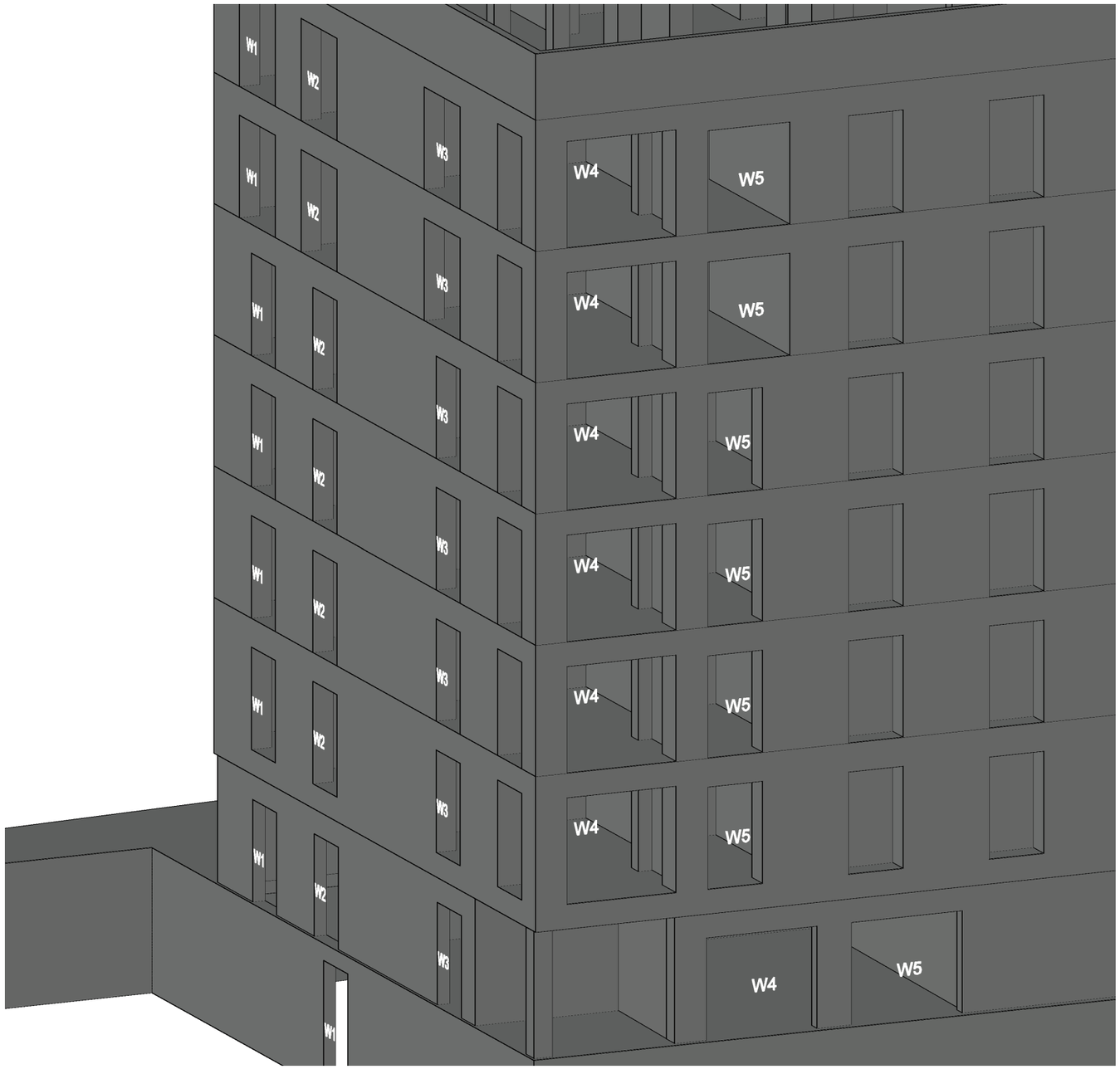

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Project: Hayes Town Central Estate
London

Title: Brickfield Building
Window Map

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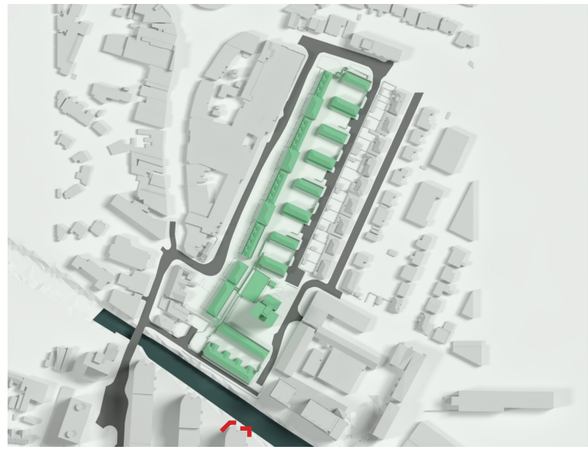

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Title	Navigation Building Window Map
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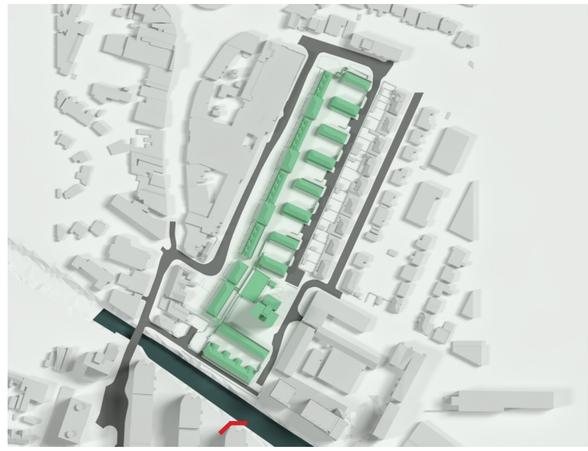

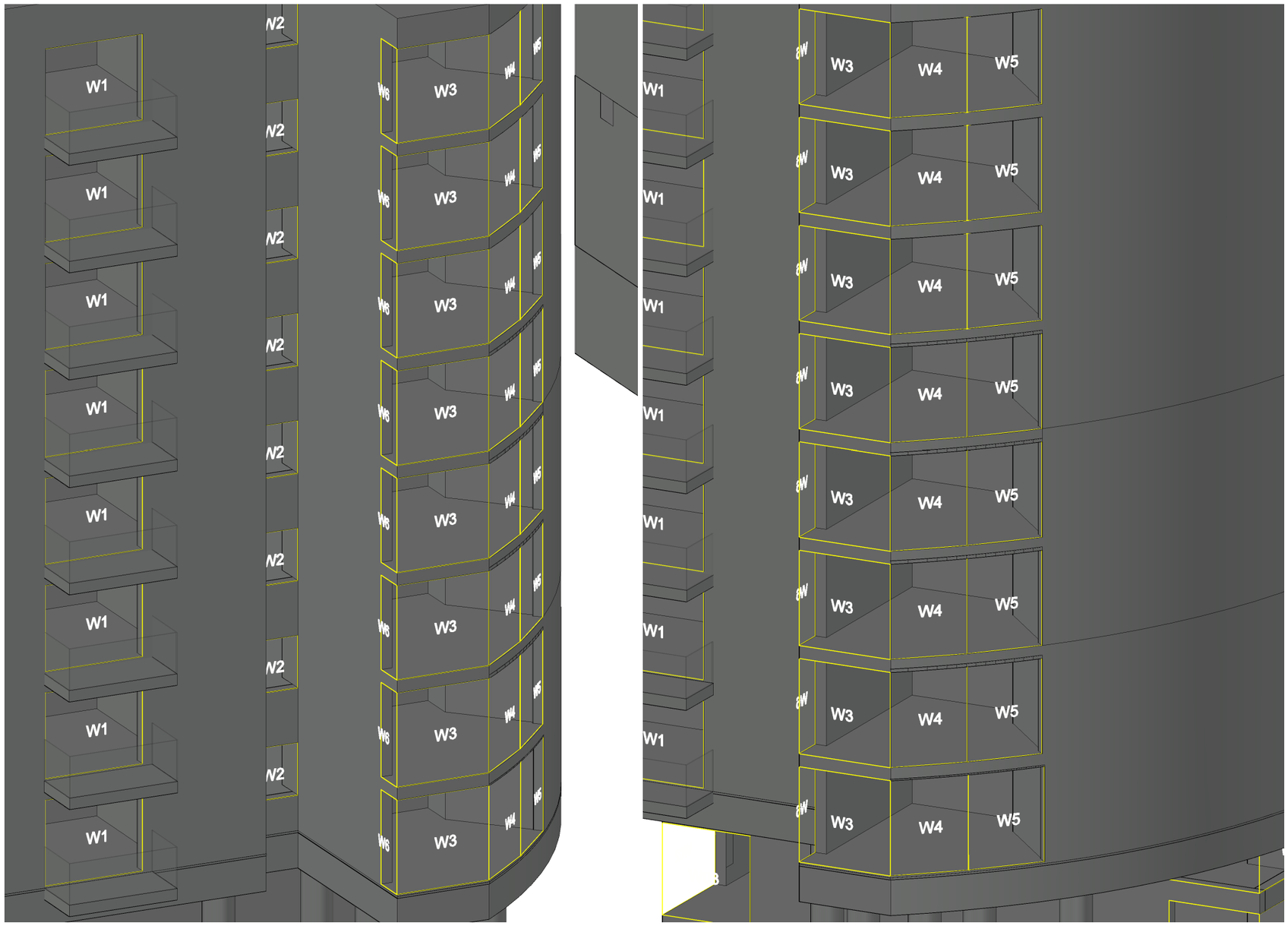

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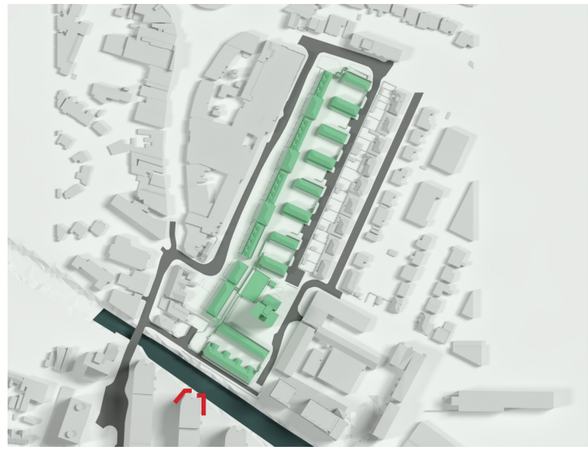

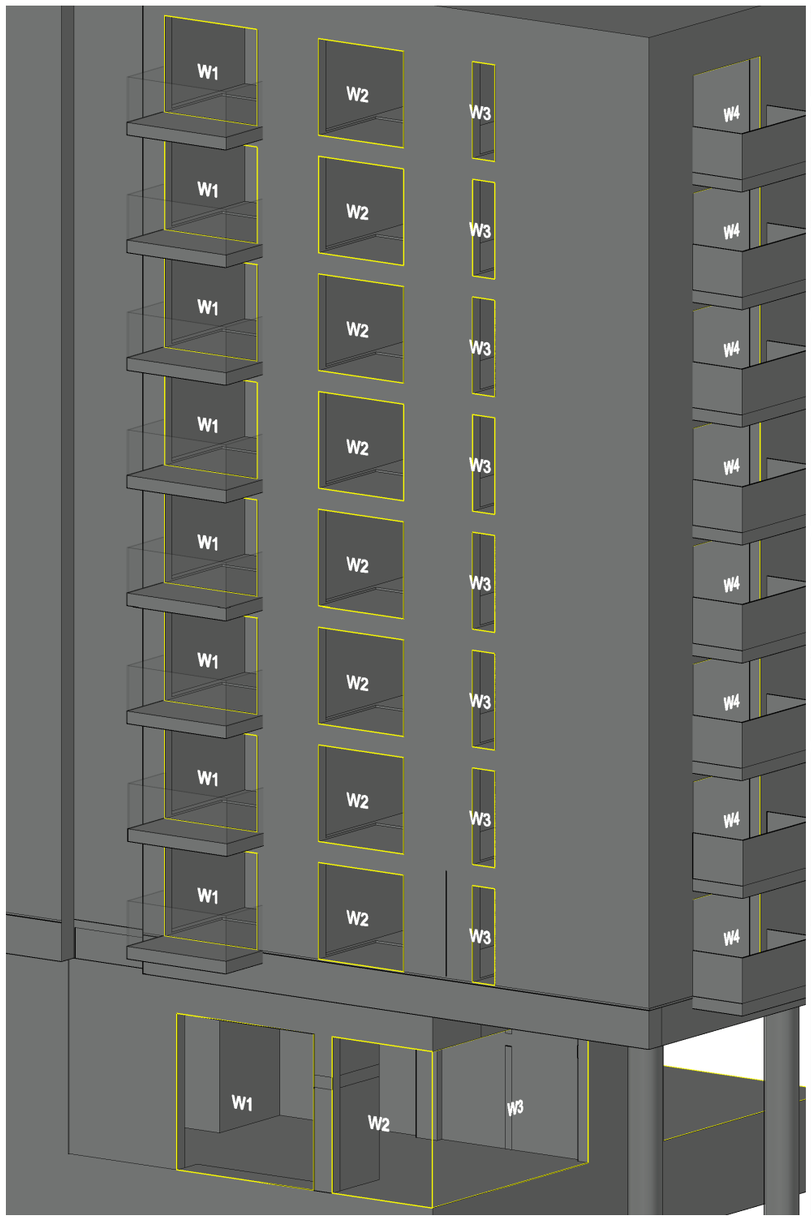

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Ordnance Survey

Project: Hayes Town Central Estate
London

Title: Cardinal Building
Window Map

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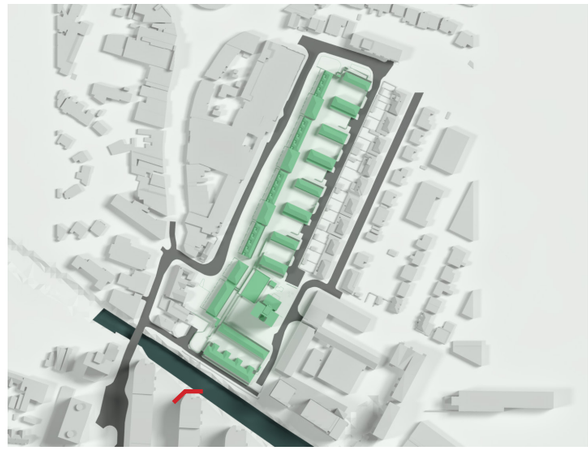

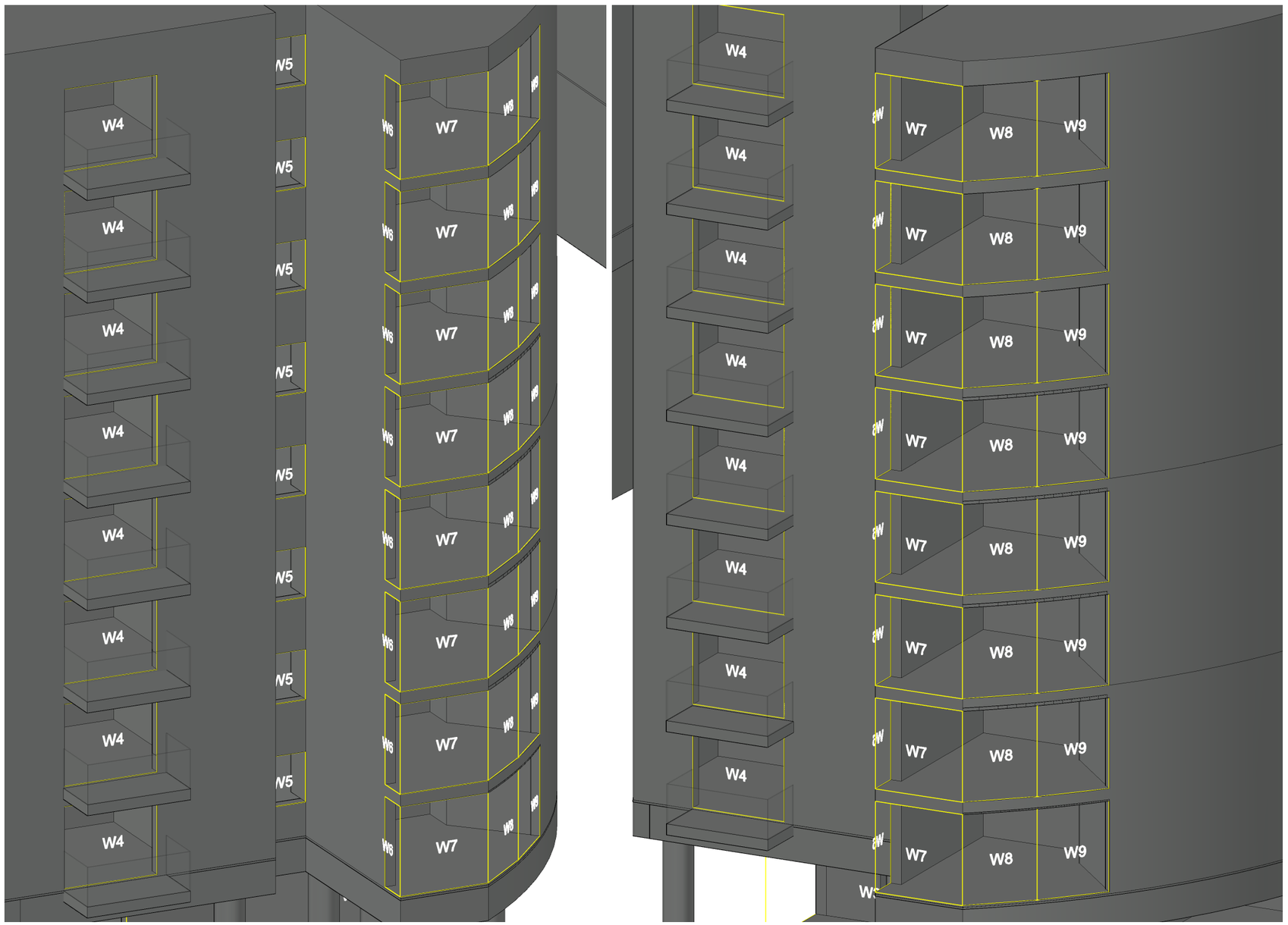

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Title	Cardinal Building Window Map
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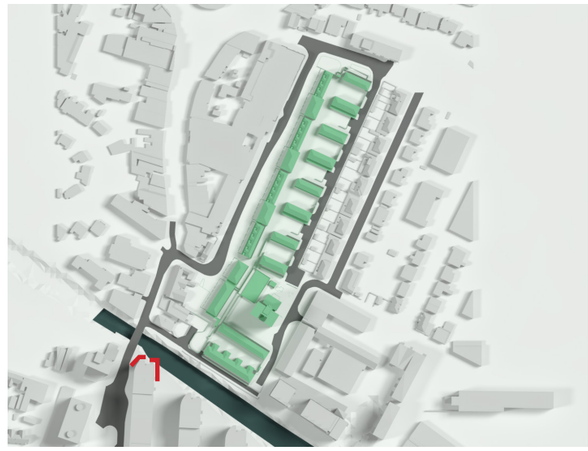

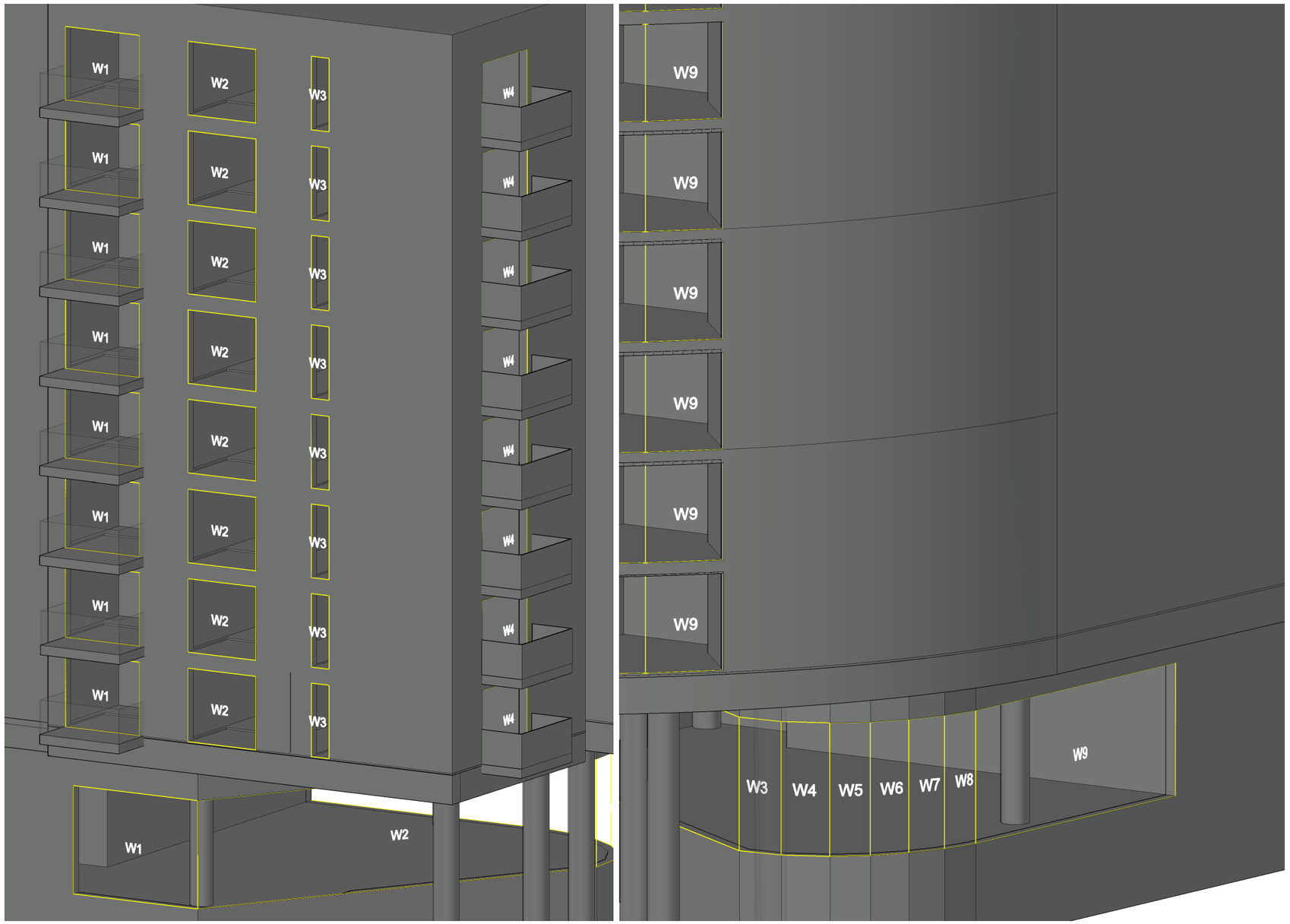

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Title	Vantage Building Window Map
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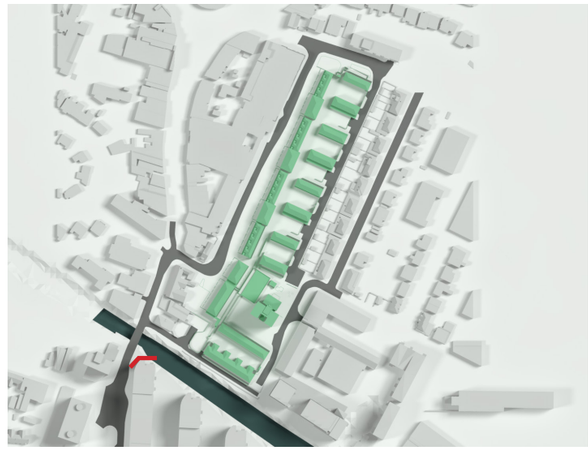

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Project	Hayes Town Central Estate London
Title	Vantage Building Window Map
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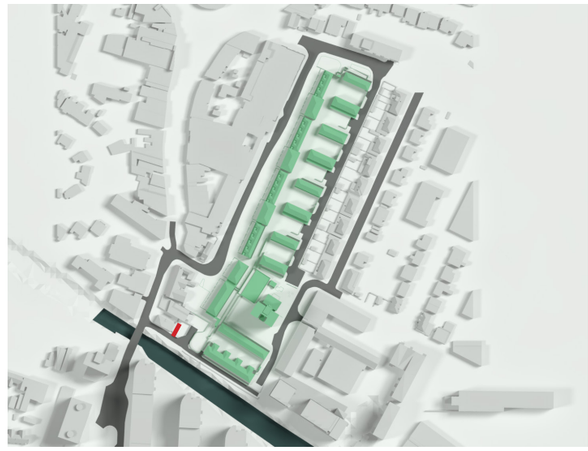

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Project: Hayes Town Central Estate
London

Title: 81 Station Road
Window Map

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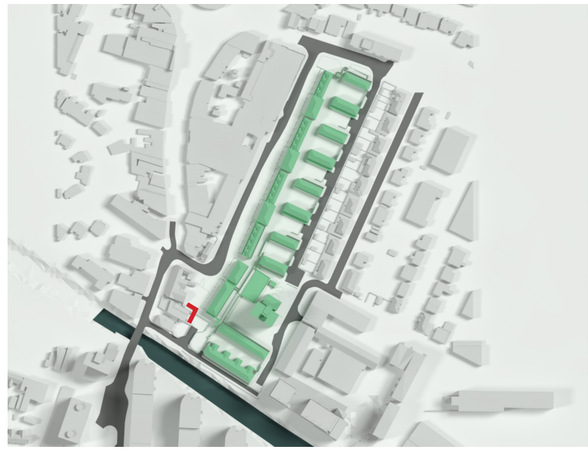

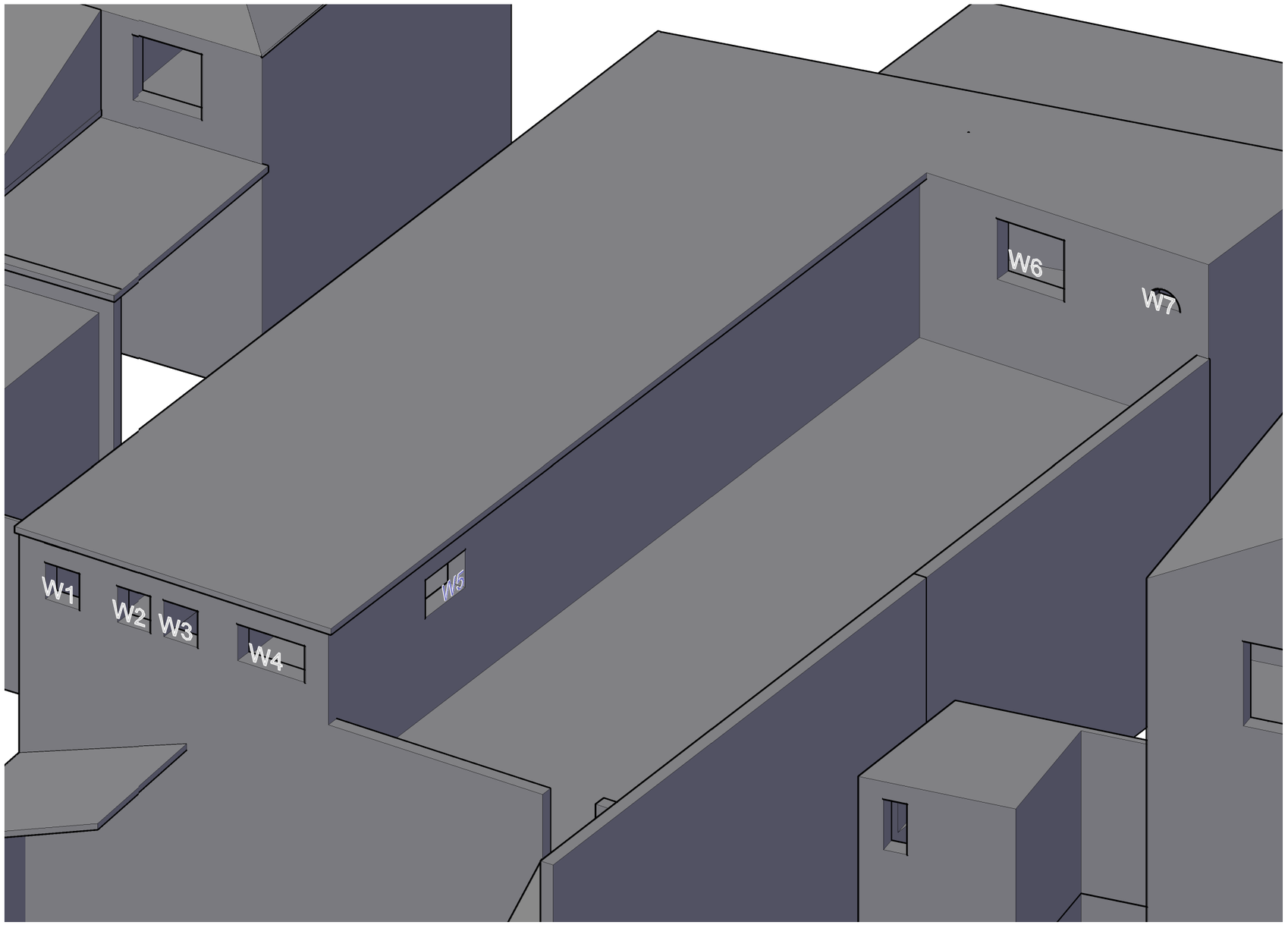

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Project	Hayes Town Central Estate London
Title	75 Station Road Window Map
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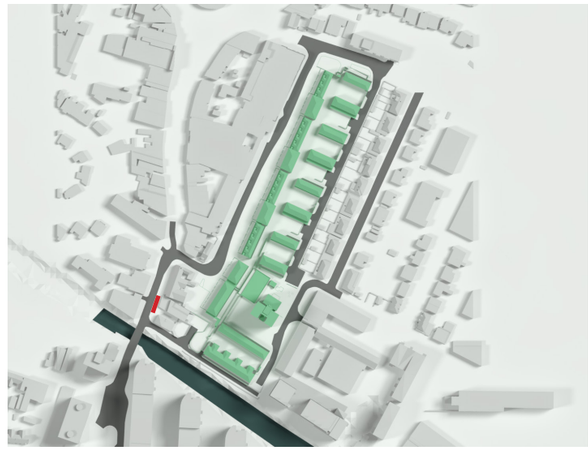

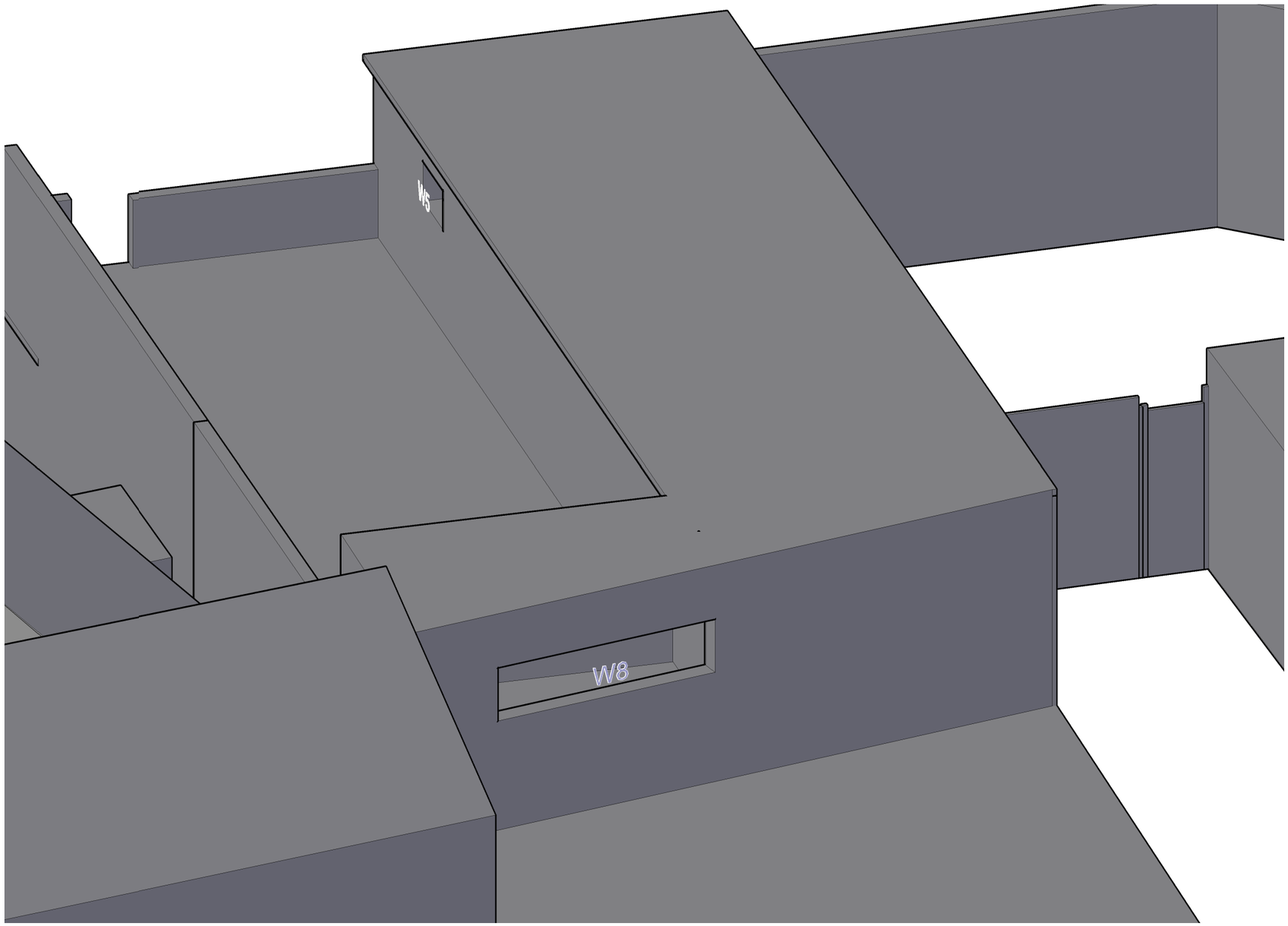

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Project: Hayes Town Central Estate
London

Title: 75 Station Road
Window Map

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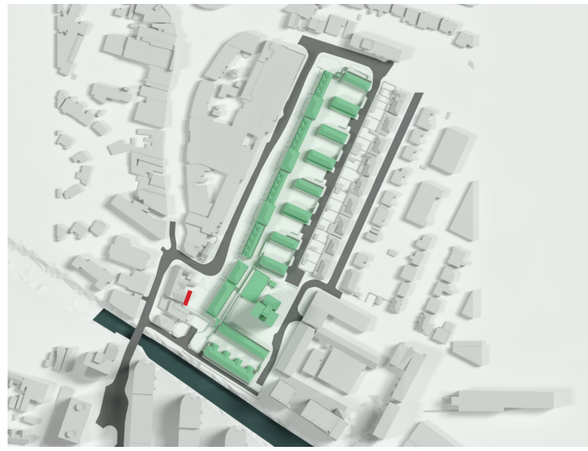

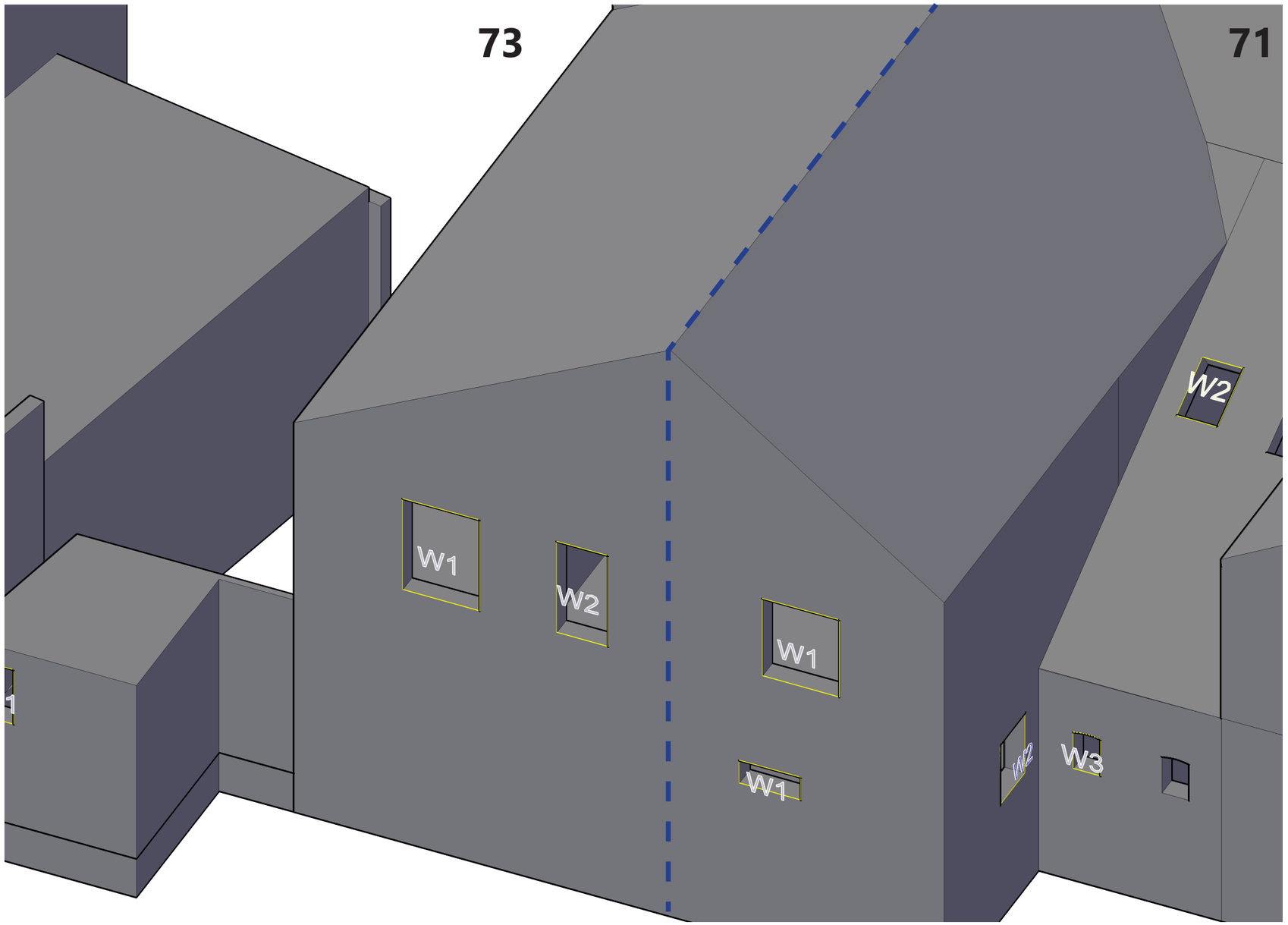

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Project	Hayes Town Central Estate London		
Title	73-71 Station Road Window Map		
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