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21<sup>st</sup> October 2024

Dear Helen

**RE: 24/1704/FUL for 2-6 London Road, Twickenham TW1 3RRT Daylight and Sunlight targets**

The BRE guidance provides recommendations on daylight and sunlight targets for new developments, referencing the standards in BS EN 17037. However, these targets are often challenging to achieve, particularly in urban environments and for building conversions.

The summary section of the BRE Guidelines emphasises that these recommendations are ‘**purely advisory**,’ and the numerical target values may be adjusted to suit the specific needs of the development and its location. For instance, the numerical targets are based on traditional low-density suburban housing, making it appropriate to apply more flexible targets when assessing modern dwellings in urban environments. Additionally, many conversions, particularly those under permitted development rights, face inherent constraints, such as fixed window positions, internal structural configurations, and building orientation. As such, determining what constitutes ‘adequate natural light’ requires professional judgment and flexibility.

The most significant updates in the guidance relate to the assessment of daylight and sunlight in new dwellings, in response to the 2018 edition of BS EN 17037. Notably, the average daylight factor (ADF) is no longer used as a standard measure. Instead, there are two assessment methods:

1. **Daylight Illuminance (sDA) Assessment:** This method measures the amount of light reaching a surface and assesses whether adequate light is achieved over a proportion of the space for at least half of the daylight hours. This is referred to as spatial daylight autonomy and involves climate-based daylight modelling, using local weather data to simulate natural lighting conditions throughout the year.
2. **Daylight Factor Assessment:** This alternative method uses a daylight factor based on a standard overcast sky and assesses whether the target is met over a portion of the space. While this method doesn’t vary by site location or orientation like the illuminance method, target values do vary by latitude.

Both methods are acceptable for assessments, though it is common for new-build developments to face challenges in meeting these standards. It is important to note that all rooms on the development meet the sDA assessment criteria.

Additionally, while we are not suggesting the removal of the trees outside the property, it is important to note that the shading from these trees, particularly for the lower-floor units, does affect the daylight performance, and so therefore they have been included in the model. Without the trees, these properties would perform better in terms of daylight access. However, this is beyond the control of the proposed conversion, as urban environments inherently present such constraints.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'N Sadler', with a long, sweeping horizontal stroke at the end.

Naomi Sadler  
**Director**

