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Daylight and Sunlight Report
for the Proposed Development at
25 Old Gloucester Street, London, WC1N 4AF

Prepared for:	Box Associates
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Date:	18 September 2023
Job Reference:	2027/JN

CONTENTS PAGE

1. EXECUTIVE SUMMARY

1.1 Scope of Service

1.1.1 We have been instructed by Box Associates to consider the potential impact upon the amenity of the surrounding residential properties, which may arise from the proposed development at 25 Old Gloucester Street, London, WC1N 4AF. We have also been instructed to determine the potential daylighting availability of the proposed accommodation.

1.2 BRE Assessment Criteria

1.2.1 To ensure that this assessment has been appropriately considered, daylight and sunlight assessments have been undertaken in accordance with the Building Research Establishment Report 'Site Layout Planning for Daylight and Sunlight – A Guide to Good Practice' 2022 (the "BRE guide"). It is intended to be used with BS EN 17037, and its UK National Annex, which gives specific minimum recommendations for habitable rooms in dwellings in the United Kingdom.

1.2.2 The standards and tests applied within this assessment are briefly described in Section 3.

1.3 Daylight and Sunlight

1.3.1 Regarding the surrounding properties, the proposed development is in accordance with the BRE guidelines for daylight, sunlight, and overshadowing.

1.3.2 For the proposed accommodation, Box Associates have carefully considered this site and have incorporated elements within the designs to maximise ambient daylighting potential including multiple windows and light coloured internal finishes.

1.3.3 The proposed accommodation will therefore be compliant with BS EN 17037 and its UK National Annex.

1.4 Generally

1.4.1 When considering the numerical results, it is important to approach and interpret the BRE guidelines flexibly along with the following material mitigating factors:

*The BRE guidelines recognises that buildings located uncommonly close to the site boundary, as is the case here, may be considered as "bad" neighbours, taking more than their fair share of light. Accordingly, a greater reduction in daylight or sunlight may be unavoidable and so the local authority may wish to apply different target values.
*Kitchens and bedrooms are given less weighting than that of a living room.

2. INTRODUCTION

2.1 Scope of Service

2.1.1 We have been instructed by Box Associates to consider the potential impact upon the amenity of the surrounding residential properties, which may arise from the proposed development at 25 Old Gloucester Street, London, WC1N 4AF. We have also been instructed to determine the potential daylighting availability of the proposed accommodation.

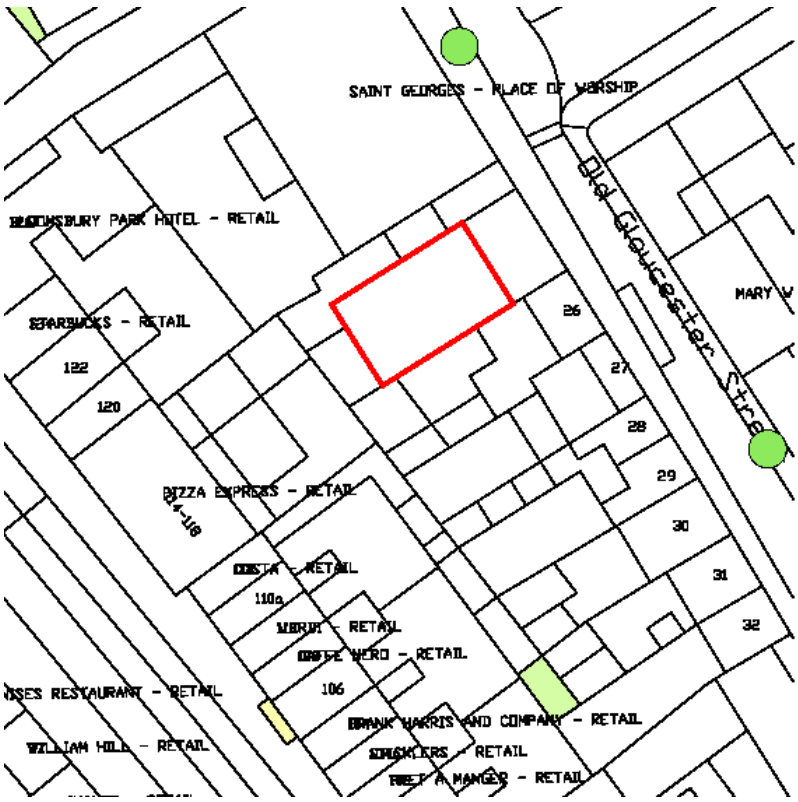
2.2 Assessment

2.2.1 To ensure that this assessment has been appropriately considered, daylight and sunlight assessments have been undertaken in accordance with the Building Research Establishment Report 'Site Layout Planning for Daylight and Sunlight – A Guide to Good Practice' 2022 (the "BRE guide"). It is intended to be used with BS EN 17037, and its UK National Annex, which gives specific minimum recommendations for habitable rooms in dwellings in the United Kingdom.

2.2.2 The standards and tests applied within this assessment are briefly described in Section 3.

2.2.3 The existing buildings adjacent to the site are shown on the Site Location Plan below.

Site Location Plan



2.2.4 The existing buildings adjacent to the site considered for this report are listed in the following table. Some of these buildings may not require a comprehensive assessment with the reasons for these findings given later in this report under section 3: Results and Consideration.

Adjacent Building Summary Table		
Name/Address of Building	**Assumed Use of Building**	**Position in Relation to the Proposed Development**
Bloomsbury Park Hotel	Commercial	West
Bloomsbury Thistle Hotel	Commercial	Northwest
Saint Georges	Community	North
26 Old Gloucester Street (including the rear building)	Commercial /Residential	South
Rear of 27 Old Gloucester Street	Commercial	South
Ormande Mansions	Commercial /Residential	South West
Russel Square Mansions	Residential	South West

2.3 Limitations

2.3.1 Our assessment is based on the proposed development drawings by ATP Associates.

2.3.2 Limited topographical survey information was provided in relation to the existing buildings on site and ground heights. Where buildings were not surveyed, the locations and heights were derived from site photographs and oblique aerial photography.

2.3.3 We refer you to the drawings which accompany this report for a list of the third party information relied upon which our 3D computer model and resultant analyses are based.

3. BRE CRITERIA AND MITIGATING FACTORS

3.1 BRE Daylight Criteria

3.1.1 The BRE guide target value for the Annual Probable Sunlight Hours (APSH) to a living room, is 25%, 5% of which should be enjoyed during the winter months. However, where the values are lower than this in the existing situation, the BRE allows a reduction of 20%, again, *subject to mitigating factors*.

3.1.2 The overshadowing assessment is undertaken on 21 March, the spring equinox. This assessment shows areas of a subject amenity area where less than 2 hours of sunlight will be available during the winter period, however, the subject area may still receive some sunlight during the summer. if an open amenity area, is more than 50% in shade for more than 2 hours in either existing or proposed situations, and is reduced by more than 20% of its existing value of a new development, then that loss is likely to be noticeable.

3.1.3 These criteria are, however, purely numerical guidelines. They can be misinterpreted as a hard and fast rule, which is of course an unsustainable argument at planning. A loss of greater than 20% implies that the loss may be noticeable by its occupants, but noticeable does not mean, significant or adverse, it just means that it needs to be considered in the broader context. Namely, is the development acceptable in respect of all the surrounding circumstances? This leads us on to the mitigating factors.

3.2 Mitigating Factors

3.2.1 As with all development sites, it would be helpful at this stage to outline the mitigating factors.

3.2.2 Mitigating factors are to be considered in conjunction with the numerical data, particularly with regards to the specific surrounding circumstances, to arrive at a more balanced view.

3.2.3 By balanced, it is meant that the two often conflicting material considerations at planning, to have amenity protected (neighbours) and to utilise adjacent land in a reasonable manner (developer), need to be considered fairly.

3.2.4 The BRE guidelines states at the beginning and throughout that it is "to be interpreted flexibly"; "not intended to constrain but help the designer"; and "not to be used as an instrument of planning policy".

3.2.5 The simplest way of approaching all the above is to keep in mind one basic question – "is it [the development] fair/balanced/acceptable in consideration of all the surrounding circumstances".

<u>Mitigating Factor #1</u>

3.2.6 The main mitigating factor is, that where buildings located uncommonly close to the site boundary, they may be considered as "bad" neighbours, taking more than their fair share of light. Accordingly, a greater reduction in daylight or sunlight may be unavoidable and so the local authority may wish to apply different target values.

Mitigating Factor #2

3.2.7 Where sites are undeveloped or are infill sites, again a higher degree of obstruction may be unavoidable leading to a higher frequency of non-compliance. So, for example, you have a gap in a line of terraced properties, or an existing street scape of 6-storey high buildings. Where a developer wishes to fill this gap, or indeed reinstate a previous building, it would certainly be acceptable in planning terms, irrespective of the potential effect on surrounding buildings.

Mitigating Factor #3

3.2.8 The BRE guidelines also recognises that where buildings match the height and proportions of existing surrounding buildings a higher degree of obstruction may be unavoidable, leading to a higher frequency of non-compliance.

Mitigating Factor #4

3.2.9 Additionally, kitchens and bedrooms are generally given less weighting than that of a principal room such as a living room.

4. RESULTS AND CONSIDERATION

4.1 Daylight and Sunlight

4.1.1 Detailed test results are shown in Appendix A.

4.2 Our Approach

4.2.1 We have assessed the surrounding residential buildings that are most likely to be affected by the proposed development. Other properties are either not residential, aligned at an oblique angle, or are considered to be too far away to be affected. They have therefore not been assessed.

4.2.2 We have also considered the windows and the rooms of each building listed. With some buildings, we generally obtain floor plans from the local authority planning portal, or sales brochures. Where building plans are not readily available, generally, we designate the windows and rooms as habitable within the BRE framework, unless there are obvious clues that would suggest otherwise.

4.2.3 Things such as opaque glazing, soil pipes, stairwells etc., suggest toilets, bathrooms, or circulation spaces, which in accordance with the BRE guidelines need not be assessed.

4.2.4 For habitable rooms, we look for paraphernalia in the windows, blinds, flue pipes, which might suggest a kitchen, smaller windows with net curtains which suggests bedrooms and say larger windows for living rooms etc.

4.3 Our 3D Model.

4.3.1 We have constructed our 3D model using the data provided by the survey and Box Associates' proposed planning drawings.

Existing Baseline

4.3.2 The existing baseline condition is the 2013 approved scheme ref: 2011/6097/P, which we understand has been implemented, see accompanying drawing 2027/DSO/01.

Proposed Development

4.3.3 The proposed development comprises a basement extension and the incorporation of residential accommodation to the main building fronting Gloucester Street at second and third floor levels, see accompanying drawing 2027/DSO/01.

4.3.4 In accordance with the BRE guidelines, circulation space, hallways, storerooms, toilets, and bathrooms, need not be assessed.

Surrounding Buildings

4.3.5 Because the new application does not include additional massing above ground, there will be no change in daylight and sunlight amenity to the surrounding buildings. This has been confirmed in the accompanying spreadsheets at Appendix A.

4.4 Proposed Accommodation

4.4.1 The proposed accommodation comprises 2 no. self-contained flats at second and third floor level, see accompanying drawings 2027/DSO/ 04.

4.4.2 For our 3D assessment model, we have modelled the proposed accommodation in detail, along with all the surrounding buildings in the immediate vicinity.

4.4.3 ATP Associates have carefully considered this site and have incorporated elements within the designs to maximise ambient daylighting potential. These include: -

- Multiple windows to rooms where appropriate
- Light coloured internal finishes

4.4.4 We have been supplied with technical specifications of those light coloured internal finishes. The floor will be similar to Kahr's Oak Bright, which comes with a high Light Reflectance Value (LRV) of 0.61, and a Benjamin Moore Chantilly Lace white paint, which comes with a LRV of 92.2.

4.4.5 The BRE guidelines, however, states at paragraph C24 –

"Where surface finishes have been specified or measured on site, they can be used in the calculations with appropriate factors for maintenance and furniture. To allow for these factors, maximum reflectances

for white painted surfaces in the calculations should not exceed 0.8 indoors … and maximum reflectances for light wood floors should not exceed 0.4."

4.4.6 We have therefore reduced the LRV of the internal surface finishes accordingly.

4.4.7 For the window glass, we use a generic glass transmission of 0.64, a value of 0.2 reflectance for the ground, and 0.2 for exterior obstructions.

4.4.8 Turning now to the Spatial Daylight Autonomy (SDA) assessment results: -

4.4.9 We undertook the Illuminance Method of assessment per the BS EN 17037, and its UK National Annex.

4.4.10 It states that illuminance recommendations of 100 lux in bedrooms, 150 lux in living rooms and 200 lux in kitchens/KLDs are the median illuminances, to be exceeded over at least 50% of the assessment points (assessment area) in the room for at least half of the daylight hours.

4.4.11 We now refer you to the accompanying drawings 2027/DSO/ 04 at Appendix B and the results table at Appendix C.

4.4.12 We found that the proposed accommodation to second and third floor levels achieved the required lux to between 71% and 100% of their areas (which is why it is illustrated as red) for at least half of the daylight hours in a typical year.

4.4.13 The proposed accommodation will therefore be compliant with BS EN 17037 and its UK National Annex.

5. CONCLUSION

5.1 Daylight and Sunlight

5.1.1 Regarding the surrounding properties, the proposed development is in accordance with the BRE guidelines for daylight, sunlight, and overshadowing.

5.1.2 For the proposed accommodation, Box Associates have carefully considered this site and have incorporated elements within the designs to maximise ambient daylighting potential including multiple windows and light coloured internal finishes.

5.1.3 The proposed accommodation will therefore be compliant with BS EN 17037 and its UK National Annex.

5.2 Generally

5.2.1 When considering the numerical results, it is important to approach and interpret the BRE guidelines flexibly along with the following material mitigating factors:

*The BRE guidelines recognises that buildings located uncommonly close to the site boundary, as is the case here, may be considered as "bad" neighbours, taking more than their fair share of light.

Accordingly, a greater reduction in daylight or sunlight may be unavoidable and so the local authority may wish to apply different target values.
*Kitchens and bedrooms are given less weighting than that of a living room.

Appendix A

Daylight/Sunlight Results

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Vertical Sky Component (VSC) Assessment/ Sunlight (APSH) Assessment

Floor Ref.	Room Ref.	Room Use.	Window Ref.	Scenario	VSC	Difference	Condtn	Available Sunlight Hours					
								Annual %	Diff %	Condtn	Winter %	Diff %	Condtn
26 Old Gloucester Street													
Ground	R1	Living room	W1	Existing	6.31	1.00	YES		*North	*North		*North	*North
				Proposed	6.31								
			W2	Existing	6.19	1.00	YES		*North	*North		*North	*North
				Proposed	6.19								
			W3	Existing	5.67	1.00	YES		*North	*North		*North	*North
				Proposed	5.67								
	R2	Living room	W5	Existing	8.69	1.00	YES	14.00	1.00	YES	0.00	1.00	YES
				Proposed	8.69			14.00			0.00		
	R3	Living room	W6	Existing	8.94	1.00	YES	11.00	1.00	YES	0.00	1.00	YES
				Proposed	8.94			11.00			0.00		
First	R1	Living room	W1	Existing	9.51	1.00	YES		*North	*North		*North	*North
				Proposed	9.51								
			W2	Existing	8.94	1.00	YES		*North	*North		*North	*North
				Proposed	8.94								
			W3	Existing	7.99	1.00	YES		*North	*North		*North	*North
				Proposed	7.99								
	R2	Living room	W5	Existing	12.14	1.00	YES	19.00	1.00	YES	2.00	1.00	YES
				Proposed	12.14			19.00			2.00		
	R3	Living room	W6	Existing	11.52	1.00	YES	12.00	1.00	YES	0.00	1.00	YES
				Proposed	11.52			12.00			0.00		
Second	R1	Living room	W1	Existing	14.31	1.00	YES		*North	*North		*North	*North
				Proposed	14.31								
			W2	Existing	13.53	1.00	YES		*North	*North		*North	*North
				Proposed	13.53								
			W3	Existing	11.96	1.00	YES		*North	*North		*North	*North
				Proposed	11.96								
	R2	Living room	W5	Existing	15.76	1.00	YES	22.00	1.00	YES	3.00	1.00	YES
				Proposed	15.76			22.00			3.00		
	R3	Living room	W6	Existing	15.27	1.00	YES	15.00	1.00	YES	2.00	1.00	YES
				Proposed	15.27			15.00			2.00		
Third	R2	Living room	W5	Existing	22.61	1.00	YES	35.00	1.00	YES	7.00	1.00	YES
				Proposed	22.61			35.00			7.00		
	R3	Living room	W6	Existing	22.22	1.00	YES	26.00	1.00	YES	3.00	1.00	YES
				Proposed	22.22			26.00			3.00		
Bloomsbury Park Hotel													
First	R1	Living room	W1	Existing	10.02	1.00	YES		*North	*North		*North	*North
				Proposed	10.02								
	R2	Living room	W2	Existing	8.44	1.00	YES		*North	*North		*North	*North
				Proposed	8.44								
			W3	Existing	7.17	1.00	YES		*North	*North		*North	*North
				Proposed	7.17								
Second	R1	Living room	W1	Existing	15.57	1.00	YES		*North	*North		*North	*North
				Proposed	15.57								
	R2	Living room	W2	Existing	12.86	1.00	YES		*North	*North		*North	*North
				Proposed	12.86								
			W3	Existing	10.54	1.00	YES		*North	*North		*North	*North
				Proposed	10.54								
Bloomsbury Thistle Hotel													

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Vertical Sky Component (VSC) Assessment/ Sunlight (APSH) Assessment

Floor Ref.	Room Ref.	Room Use.	Window Ref.	Scenario	VSC	Difference	Condtn	Available Sunlight Hours					
								Annual %	Diff %	Condtn	Winter %	Diff %	Condtn
Ground	R1	Unknown	W1	Existing	8.15	1.00	YES	15.00	1.00	YES	1.00	1.00	YES
				Proposed	8.15			15.00			1.00		
First	R1	Bedroom	W1	Existing	21.44	1.00	YES	50.00	1.00	YES	14.00	1.00	YES
				Proposed	21.44			50.00			14.00		
			W2	Existing	9.19	1.00	YES		*North	*North		*North	*North
				Proposed	9.19								
	R2	Bathroom	W3	Existing	10.96	1.00	YES	15.00	1.00	YES	6.00	1.00	YES
				Proposed	10.96			15.00			6.00		
Second	R1	Bedroom	W1	Existing	27.62	1.00	YES	63.00	1.00	YES	21.00	1.00	YES
				Proposed	27.62			63.00			21.00		
			W2	Existing	17.37	1.00	YES		*North	*North		*North	*North
				Proposed	17.37								
	R2	Bathroom	W3	Existing	18.01	1.00	YES	25.00	1.00	YES	9.00	1.00	YES
				Proposed	18.01			25.00			9.00		
Ormande Mansions													
First	R1	Bedroom	W1	Existing	2.45	1.00	YES		*North	*North		*North	*North
				Proposed	2.45								
			W2	Existing	1.76	1.00	YES		*North	*North		*North	*North
				Proposed	1.76								
	R2	Bedroom	W1	Existing	3.89	1.00	YES		*North	*North		*North	*North
				Proposed	3.89								
			W2	Existing	3.23	1.00	YES		*North	*North		*North	*North
				Proposed	3.23								
Rear of 27 Old Gloucester Street													
First	R2	Bedroom	W13	Existing	10.24	1.00	YES		*North	*North		*North	*North
				Proposed	10.24								
	R3	Bedroom	W14	Existing	8.70	1.00	YES		*North	*North		*North	*North
				Proposed	8.70								
Russel Square Mansions													
First	R1	Bedroom	W1	Existing	14.00	1.00	YES		*North	*North		*North	*North
				Proposed	14.00								
	R2	Bedroom	W2	Existing	19.03	1.00	YES		*North	*North		*North	*North
				Proposed	19.03								
	R4	Bedroom	W4	Existing	16.24	1.00	YES		*North	*North		*North	*North
				Proposed	16.24								
			W5	Existing	16.22	1.00	YES		*North	*North		*North	*North
				Proposed	16.22								
			W6	Existing	15.53	1.00	YES		*North	*North		*North	*North
				Proposed	15.53								
	R5	Bedroom	W7	Existing	13.64	1.00	YES		*North	*North		*North	*North
				Proposed	13.64								
Second	R1	Bedroom	W1	Existing	18.43	1.00	YES		*North	*North		*North	*North
				Proposed	18.43								
	R2	Office	W2	Existing	21.65	1.00	YES		*North	*North		*North	*North
				Proposed	21.65								
	R3	Bedroom	W3	Existing	23.17	1.00	YES		*North	*North		*North	*North
				Proposed	23.17								
	R4	Bedroom	W4	Existing	19.57	1.00	YES		*North	*North		*North	*North
				Proposed	19.57								

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Vertical Sky Component (VSC) Assessment/ Sunlight (APSH) Assessment

Floor Ref.	Room Ref.	Room Use.	Window Ref.	Scenario	VSC	Difference	Condtn	Available Sunlight Hours					
								Annual %	Diff %	Condtn	Winter %	Diff %	Condtn
			W5	Existing	19.38	1.00	YES		*North	*North		*North	*North
				Proposed	19.38								
			W6	Existing	18.47	1.00	YES		*North	*North		*North	*North
				Proposed	18.47								
	R5	Bedroom	W7	Existing	15.96	1.00	YES		*North	*North		*North	*North
				Proposed	15.96								
Saint Georges													
Ground	R1	Pastoral	W1	Existing	4.86	1.00	YES	11.00	1.00	YES	2.00	1.00	YES
				Proposed	4.86			11.00			2.00		

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Daylight Distribution (DD) Assessment

Floor Ref.	Room Ref.	Room Use	Property Type	Room Area	Lit Area Existing	Lit Area Proposed	Pr/Ex	Meets BRE Criteria
Bloomsbury Thistle Hotel								
Ground	R1	Unknown	Area m2	3.65	2.91	2.91		
			% of room		79.87%	79.87%	1.00	YES
First	R1	Bedroom	Area m2	14.13	12.56	12.56		
			% of room		88.88%	88.88%	1.00	YES
	R2	Bathroom	Area m2	3.55	3.15	3.15		
			% of room		88.76%	88.76%	1.00	YES
Second	R1	Bedroom	Area m2	14.13	13.50	13.50		
			% of room		95.53%	95.53%	1.00	YES
	R2	Bathroom	Area m2	3.55	3.43	3.43		
			% of room		96.64%	96.64%	1.00	YES
26 Old Gloucester Street								
Ground	R1	Living room	Area m2	31.66	4.74	4.74		
			% of room		14.97%	14.97%	1.00	YES
	R2	Living room	Area m2	12.35	6.18	6.18		
			% of room		50.07%	50.07%	1.00	YES
	R3	Living room	Area m2	8.93	6.25	6.25		
			% of room		70.02%	70.02%	1.00	YES
First	R1	Living room	Area m2	31.66	6.64	6.64		
			% of room		20.96%	20.96%	1.00	YES
	R2	Living room	Area m2	12.35	10.09	10.09		
			% of room		81.68%	81.68%	1.00	YES
	R3	Living room	Area m2	8.93	8.23	8.23		
			% of room		92.12%	92.12%	1.00	YES
Second	R1	Living room	Area m2	28.85	6.80	6.80		
			% of room		23.56%	23.56%	1.00	YES
	R2	Living room	Area m2	12.35	12.01	12.01		
			% of room		97.26%	97.26%	1.00	YES
	R3	Living room	Area m2	8.93	8.52	8.52		
			% of room		95.34%	95.34%	1.00	YES
Third	R2	Living room	Area m2	12.35	12.23	12.23		
			% of room		99.05%	99.05%	1.00	YES
	R3	Living room	Area m2	8.93	8.84	8.84		
			% of room		98.98%	98.98%	1.00	YES
Saint Georges								
Ground	R1	Pastoral	Area m2	29.86	26.30	26.30		
			% of room		88.08%	88.08%	1.00	YES
Ormande Mansions								

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Daylight Distribution (DD) Assessment

First	R1	Bedroom	Area m2	13.95	7.12	7.12		
			% of room		51.06%	51.06%	1.00	YES
	R2	Bedroom	Area m2	13.95	8.03	8.03		
			% of room		57.59%	57.59%	1.00	YES
Russel Square Mansions								
First	R1	Bedroom	Area m2	10.74	10.38	10.38		
			% of room		96.59%	96.59%	1.00	YES
	R2	Bedroom	Area m2	49.62	26.61	26.61		
			% of room		53.64%	53.64%	1.00	YES
	R4	Bedroom	Area m2	30.80	18.46	18.46		
			% of room		59.92%	59.92%	1.00	YES
	R5	Bedroom	Area m2	14.57	12.79	12.79		
			% of room		87.78%	87.78%	1.00	YES
Second	R1	Bedroom	Area m2	10.74	10.60	10.60		
			% of room		98.64%	98.64%	1.00	YES
	R2	Office	Area m2	6.36	6.36	6.36		
			% of room		100.00%	100.00%	1.00	YES
	R3	Bedroom	Area m2	10.15	10.14	10.14		
			% of room		99.96%	99.96%	1.00	YES
	R4	Bedroom	Area m2	30.80	22.20	22.20		
			% of room		72.07%	72.07%	1.00	YES
	R5	Bedroom	Area m2	14.57	13.68	13.68		
			% of room		93.90%	93.90%	1.00	YES
Bloomsbury Park Hotel								
First	R1	Living room	Area m2	16.55	4.70	4.70		
			% of room		28.40%	28.40%	1.00	YES
	R2	Living room	Area m2	20.04	6.64	6.64		
			% of room		33.12%	33.12%	1.00	YES
Second	R1	Living room	Area m2	16.55	10.29	10.29		
			% of room		62.21%	62.21%	1.00	YES
	R2	Living room	Area m2	20.04	13.30	13.30		
			% of room		66.34%	66.34%	1.00	YES
Rear of 27 Old Gloucester Street								
First	R2	Bedroom	Area m2	11.42	2.37	2.37		
			% of room		20.72%	20.72%	1.00	YES
	R3	Bedroom	Area m2	7.30	5.55	5.55		
			% of room		76.01%	76.01%	1.00	YES

Appendix B

Context Drawings

Appendix C

Proposed Accommodation Results

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Spatial Daylight Autonomy Assessment (BS_EN17037) - Illuminance Method

									Criteria				
Floor Ref	**Room Ref**	**Property Type**	**Room Use**	**Room Area m2**	**Effective Area**	**Median Lux**	**Area Meeting Req Lux**	**% of Area Meeting Req Lux**	**Req Lux**	**Req % of Effective Area**	**Req % of Daylight Hours**	**Daylight Hours**	**Meets Criteria**
Proposed Accommodation													
Second	R1	Residential	LKD	25.16	18.32	253	13.02	71%	200	50%	50%	4380	YES
	R2	Residential	Bedroom	10.87	6.50	389	6.50	100%	100	50%	50%	4380	YES
Third	R1	Residential	LKD	25.99	19.04	354	18.94	99%	200	50%	50%	4380	YES
	R2	Residential	Bedroom	11.82	7.30	374	7.30	100%	100	50%	50%	4380	YES