

INTERNAL DAYLIGHT ASSESSMENT

**5-8A Whitehall Parade, London
Road, East Grinstead**

11TH April 2025

Prepared for Martell's of Sutton Ltd

Issue: IS01



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1. EXECUTIVE SUMMARY

MDX Surveyors have undertaken detailed technical internal Daylight assessment of the 'Proposed Development' designed by MADE Architects for 5-8A Whitehall Parade to confirm that the proposed residential units will receive adequate natural light within all rooms.

MDX have been instructed by Martell's of Sutton Ltd (The Applicant), to produce this Internal Daylight report for the site known as 5-8A Whitehall Parade, London Road, East Grinstead (hereafter known as the site).

The purpose of this report is to ascertain whether the proposed accommodation within the residential elements of the development will provide adequate natural daylight amenity to future residents and users.

The proposed development has been designed by MADE Architects and consists of '*Conversion of first floor from Use Class E to C3*, and the provision of five one-bedroom apartments.

MDX Surveyors have worked closely with MADE Architects, and the proposed development has gone through multiple design iterations and to maximise the daylight to the proposed residential units.

Overall, 7 (70%) out of all 10 proposed habitable rooms achieve the minimum levels of spatial Daylight Autonomy (sDA) targets discussed in Section 3 of this report.

The remaining three rooms are bedrooms that don't meet the sDA target, the BRE considers bedrooms to be '*less important*' than primary living spaces such as Living Kitchen Diners (LKD's), due to their primary use for sleeping. The LKD's in all proposed residential units meet the targets set out in Chapter 2 of this report.

The technical analysis of the proposed development demonstrates all the primary living spaces (LKD's) receive good levels of daylight amenity given their location, making the proposed units bright desirable places to live. It is therefore MDX's opinion that the requirement set out in Paragraph MA.2 (2) (f) of the General Permitted Development Order (GPDO) 2015 is met, and adequate natural light is available in all proposed residential units.

2. PLANNING POLICY AND METHODOLOGY

When seeking Prior Approval via Class MA (Commercial to Residential conversion) under the General Permitted Development Order (GPDO) 2015 (as amended), considerations relating to daylight fall under specific criteria that local planning authorities (LPAs) must consider. Key Element Relating to Daylight Under Class MA:

Article 3, Schedule 2, Part 3, Class MA - Prior Approval Considerations

Under Paragraph MA.2 (2) (f), the LPA must consider whether the residential use will provide adequate natural light in all habitable rooms.

The GPDO suggests that all proposed habitable rooms must have adequate light but does not give a clear indication of what is considered adequate.

National Planning Policy Framework (NPPF) December 2024

The National Planning Policy Framework (December 2023) paragraph 130c outlines that when considering applications for housing;

"local planning authorities should refuse applications which they consider fail to make efficient use of land, taking into account the policies in this Framework. In this context, when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards)."

This suggests that LPA's must take a flexible approach to applying policies or guidance relating to daylight and sunlight, when considering applications for housing. This does have the caveat that the resulting scheme should provide acceptable living standards.

Building Research Establishment (BRE) Guidelines

The BRE Guide "Site Layout Planning for Daylight and Sunlight" (2022) is a widely accepted reference for assessing daylight and sunlight.

When the BRE Guidelines (BR209) were updated in 2022, the assessment method for internal daylight analysis was updated to reflect BS EN 17037:2018, "Daylight in Buildings". This removed Average Daylight Factor as the primary assessment and replaced it with the Illuminance Method and the Daylight Factor Method.

Following a review of the European Standard by a dedicated commission of UK experts, the British Standard Institution concluded that the targets suggested "may not be achievable for some buildings, particularly dwellings". In particular, the UK committee believed this could be the case for "dwellings with basement rooms or those with significant external obstructions (for example, dwellings situated in a dense urban area or with tall trees outside), or for existing buildings being refurbished or converted into dwellings"

As a consequence, a UK National Annex was appended to BS EN 17037:2018 which suggested alternative targets, in line with those of the former BS8206-2:2008 and the previous (2011) BR209. These lower targets were then incorporated into the 2022 publication of BR209.

The illuminance method is Climate Based Daylight Modelling, and the daylight illuminance is predicted using sun and sky conditions based on the location of the site, the orientation and meteorological data.

The Spatial Daylight Autonomy (SDA) is an assessment of how often set points at the working plane within a room meet or exceed a target threshold to over 50% of the room area for more than half of the daylight hours in a year. The target lux is dependent on the use of the room. The BRE Guidelines suggest these target values are;

- 100 lux for bedrooms
- 150 lux for living rooms
- 200 lux for living/kitchen/diners, kitchens, and studios.

Paragraph 1.6 of the introduction to the BRE Guidelines states;

'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.'

It then goes on to say;

'In special circumstances the developer or planning authority may wish to use different target values. For example, in a historic city centre'

In town centre locations such as this, there is a higher demand for large, multi-use rooms in accordance with the requirements for modern living. These types of rooms, such as the LKDs proposed within this development, are by their very nature often deeper rooms. As a result, the accommodation is predominantly designed to harness daylight potential within the areas where it will be most actively enjoyed, with the reception or living room areas of the rooms being typically located adjacent to the windows. The kitchen areas, commonly located at the rear of these open plan living spaces, are designed with supplementary artificial task lighting to maximise lighting for carrying out intricate cooking tasks.

This can often make achieving the 200 Lux target for multi-use rooms which include a kitchen very challenging in town centre locations. Therefore, a target of 150 Lux has been applied for the LKD spaces as the BRE Guidelines state that the target for a living room could be used for a combined LKD if the kitchens are not treated as habitable spaces, as it may avoid small separate kitchens in a design. This is the industry standard in situations such as this.

3. CONCLUSIONS ON DAYLIGHT AMENITY

All proposed habitable rooms have been tested for spatial Daylight Autonomy (sDA) according to the targets set out in the UK National Annex of the BS EN 17037:2018, which sets illuminance targets (measured in lux) to be achieved for over 50% of the space for more than half of the daylight hours in the year.

Overall, seven (73.3%) out of the 10 habitable rooms across all plots within the Detailed Component achieve the minimum levels of spatial Daylight Autonomy (sDA) recommended within the UK National Annex for residential buildings. This figure considers 150 lux target for combined Living/Kitchen/Dining spaces (LKDs) as set out in Chapter 2 above.

The three rooms that don't meet the BRE targets are bedrooms which the BRE guidelines suggest;

'bedrooms should also be analysed although they are less important'

This is due to their primary use for sleeping. In all cases, whilst the bedroom falls short of the target, each dwelling has access to a well lit primary living space in the LKD.



Table 01 – Spatial Daylight Autonomy Analysis

In conclusion, the proposed development provides adequate daylight to the primary living spaces. Whilst a small number of bedrooms fall short of the BRE recommendations, the BRE considers these to be less important.

4. CONCLUSION

MDX Surveyors have undertaken a daylight amenity assessment in relation to the proposed change of use at 5-8A Whitehall Parade. The technical analysis has been undertaken in accordance with the BRE Guidelines, with reference to national, regional and local planning policy.

The Proposed Development has been sensitively designed through an iterative design process to maximise the daylight to the proposed residential units.

The technical analysis of the proposed development demonstrates all the primary living spaces (LKD's) receive excellent levels of daylight amenity, making the proposed units bright desirable places to live. It is therefore MDX's professional opinion that the development fulfils the requirement set out in Paragraph MA.2 (2) (f) of the General Permitted Development Order (GPDO) 2015, and adequate natural light is available in all proposed residential units.

Appendix 01 – Drawings



SOURCES OF INFORMATION:

3D MODEL
EXTRUDED OS MAP (BNG)
ASSUMED HEIGHTS

PROPOSED SCHEME DRAWINGS
IR02 - 2025.04.02 MADE ARCHITECTS LTD
RECEIVED 03.03.2025

ILLUMINANCE IN LUX



PROJECT:
5-8A WHITEHALL PARADE
EAST GRINSTEAD, RH19 1AP

TITLE:
PLAN VIEW
PROPOSED SCHEME INTERNAL TEST
SPATIAL DAYLIGHT AUTONOMY ANALYSIS

JOB NO:	RELEASE:	DRG NO:
.	01	01
DATE:	DRAWN:	SCALE:
APR 2025	CF-RG	200 @ A3



FIRST FLOOR

Appendix 02 – Internal Daylight Results

Project Name: Whitehall Parade
Project No.: MDX-005
Report Title: SDA BS En17037 Analysis - Proposed Scheme
Date of Analysis: 12/03/2025

								Criteria			
Floor Ref	Room Ref	Room Use	Room Area m2	Effective Area	Median Lux	Area Meeting Req Lux	% of Area Meeting Req Lux	Req Lux	Req % of Effective Area	Req % of Daylight Hours	Daylight Hours
5-8A Whitehall Parade											
F01	R1	LKD	27.42	20.85	401	20.85	100%	150	50%	50%	4380
	R2	Bedroom	15.75	10.95	541	10.95	100%	100	50%	50%	4380
	R3	Bedroom	15.28	10.23	472	10.23	100%	100	50%	50%	4380
	R4	LKD	24.93	19.17	408	19.17	100%	150	50%	50%	4380
	R5	LKD	37.94	28.90	206	17.81	62%	150	50%	50%	4380
	R6	Bedroom	17.32	12.62	47	1.59	13%	100	50%	50%	4380
	R7	Bedroom	13.82	9.72	86	3.93	40%	100	50%	50%	4380
	R8	LKD	21.01	15.58	197	10.05	65%	150	50%	50%	4380
	R9	LKD	21.43	15.96	199	10.37	65%	150	50%	50%	4380
	R10	Bedroom	13.42	9.23	79	3.18	34%	100	50%	50%	4380

Project Name: Whitehall Parade
Project No.: MDX-005
Report Title: Sunlight Exposure Analysis - Proposed Scheme
Date: 12/03/2025

Floor Ref	Room Ref	Room Attribute	Property Type	Room Use	Window Ref	Window Orientation	Proposed Sunlight Exposure (Hours)
5-8A Whitehall Parade							
F01	R1	Floorplans	Residential	LKD	W1	298°N	2.6
					W2	240°	4
					W3	183°	3.5
							4.2
F01	R2	Floorplans	Residential	Bedroom	W4	298°N	2.9
					W5	240°	4.1
					W6	183°	4.3
							4.6
F01	R3	Floorplans	Residential	Bedroom	W7	278°N	4.4
					W8	245°	6.1
					W9	214°	6.1
							6.1
F01	R4	Floorplans	Residential	LKD	W10	246°	3.5
					W11	246°	3.6
							3.6
F01	R5	Floorplans	Residential	LKD	W12	285°N	3.8
					W13	245°	5.8
					W14	213°	6
							6
F01	R6	Floorplans	Residential	Bedroom	W15	168°	0.5
							0.5
F01	R7	Floorplans	Residential	Bedroom	W16	168°	4
							4
F01	R8	Floorplans	Residential	LKD	W17	168°	7.1
							7.1
F01	R9	Floorplans	Residential	LKD	W18	168°	6.7
							6.7
F01	R10	Floorplans	Residential	Bedroom	W19	168°	4.8
							4.8