AVISON YOUNG

Daylight and Sunlight Report

Great Ormond Street Hospital Children's Cancer Centre (GOSHCCC)

Contents

Appendices

Date: 27 July 2023 (Rev D)

For and on behalf of Avison Young (UK) Limited

1. Executive Summary

1.1 This daylight and sunlight report has been prepared on behalf of Great Ormond Street Hospital for Children NHS Foundation Trust (the "Applicant") in collaboration with the appointed design and build contractor John Sisk & Son (Holdings) Ltd to support a Section 73 Minor Material Amendment Planning Application for the redevelopment of the Great Ormond Street Hospital ("GOSH") also referred to as the "Proposed Development", to provide a new Children's Cancer Centre ("CCC").

1.2 The Site obtained a planning permission (the "consented scheme") on 17 April 2023 for the following:

'Redevelopment of the Great Ormond Street Hospital (GOSH) Frontage Building comprising demolition of the existing building, and erection of a replacement hospital building (Class C2) with a basement, landscaped amenity spaces at roof top and balcony and ground floor levels, plant equipment, cycle storage, refuse storage and other ancillary and associated works pursuant to the development.'

1.3 Following the grant of planning permission on 17 April 2023, the Applicant is proposing refinements to the consented scheme to improve it following design development. These changes include:

- Amendments to the West Core to include the northern part of the Paul O'Gorman building (PO'G).
- Provision of connection to the Paul O'Gorman building at each floor level.
- Proposed reduction in massing above main entrance at parapet level.
- Design refinement to the front entrance bay.
- Refinement to the internal north façade comprising upgraded façade treatment.

1.4 The approved Daylight and Sunlight Assessment assessed the scheme as submitted in May 2022. The plans were changed during the Council's determination of the planning application reducing the size of the east core and lessening the schemes effects on the LVMF. The Daylight and Sunlight Assessment was not reassessed as the impact on neighbours daylight (on some of the properties at the eastern end of Great Ormond Street) would have shown a very slight improvement.

1.5 The eastern core is now modelled at the consented size and the updated Daylight and Sunlight Report reflects this.

1.6 Therefore, this Report considers two scenarios, these are the following:

- The effect the latest scheme may have on the neighbouring residential properties (Scenario 1: existing vs proposed); and

- A consented v proposed scheme which assesses whether the latest scheme causes any additional effects in comparison to the recently consented May 2023 Scheme (Scenario 2: consented vs. proposed).

1.7 The daylight and sunlight assessments have been undertaken with regard to national, regional and local planning policy and, the advice and recommendations set out in the Building Research Establishment ("BRE") report entitled *'Site layout planning for daylight and sunlight: A guide to good practice* - 2022' ("BRE Guidelines").

1.8 Policy and guidance context is important in establishing acceptable levels of neighbouring daylight and sunlight. The appropriateness of the GOSH Site has therefore been considered against key documents. At government level, policy seeks to ensure that the planning system encourages more efficient use of land and avoids building low density in accessible urban locations. Local policy acknowledges that there are significant numbers of health institutions in Camden and that these contribute to the local and national economy by supporting enterprise, innovation and providing world class facilities. LBC acknowledge that in order for these institutions to meet changing standards and requirements and sustain their leading edge, there is often an ongoing need to update and modernise facilities and it is important this is realised in a way which balances the impact on neighbouring residential amenity.

1.9 In terms of guidance, the BRE Guidelines are not fixed standards and should be applied flexibly to take account of the specific circumstances of each case. The BRE advice given is not mandatory and 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 and in special circumstances the developer or planning authority may wish to use different target values.

1.10 In accordance with the BRE Guidelines, detailed daylight and sunlight assessments have been undertaken to quantify any alteration in light that may occur because of the Proposed Development, within existing residential habitable rooms and windows.

1.11 Assessments have therefore been carried out for neighbouring properties located on Powis Place, Great Ormond Street, Orde Hall Street and Lamb's Conduit Street.

1.12 As the Site is located within an 'Area of Intensification' and a dense urban environment, a detailed study has been undertaken with regard to the levels of daylight enjoyed in the area. Five existing nearby residential properties have been identified and individually assessed. Whilst it is acknowledged that there are a wide range of daylight values across the locality which are below and above those recommended by the BRE Guidelines, the study indicates that a retained level of daylight (Vertical Sky Component "VSC") c.10% is not uncommon at ground floor level, increasing to 12%-15% and above on the upper levels. These alternative daylight targets have been applied when considering the overall acceptability of the Proposed Development.

1.13 In the existing v proposed scenario (Scenario 1) technical analysis indicates that some of the neighbouring windows and rooms may experience noticeable daylight alterations, with reference to the standard BRE Guidelines tests of VSC and No Sky Line ("NSL"). Whilst the GOSHCCC may have a noticeable effect to many of the neighbouring

windows, they would continue to receive levels of daylight (VSC) which are broadly in line with the alternative target values set out within the report.

1.14 With regard to Scenario 2, Appendix F of the BRE Guidelines sets out alternative target values for assessing daylight and sunlight. Paragraph F2 states the following:

'Sometimes there may be an extant planning permission for a site but the developer wants to change the design. In assessing the loss of light to existing windows nearby, a local authority may allow the vertical sky component (VSC) and annual probable sunlight hours (APSH) for the permitted scheme to be used as alternative benchmarks'.

1.15 Therefore, in accordance with the BRE Guidelines, AY's Scenario 2 assessment focuses on any additional daylight alterations between the consented and proposed scheme. The results demonstrate that none of the neighbouring windows would experience a material additional reduction for VSC. There would be immaterial additional losses to some properties with a maximum additional reduction of 0.51% VSC.

1.16 Whilst the BRE Guidelines (Appendix F) does not mention including a comparison of NSL results to form part of the supplementary assessment, AY has cited the NSL results for completeness. The NSL results indicate that all properties would experience immaterial additional losses, except for two properties, where small additional reductions of up to 4.79% NSL would be recorded.

1.17 The alterations to the level of light which would be caused by the proposed scheme in comparison to the consented scheme would be very minor and should not be noticeable to the occupants; in AY's professional opinion.

1.18 In terms of sunlight, the vast majority of windows facing the Site are north-west facing and therefore are not considered relevant for assessment. A small minority of windows may experience a noticeable alteration in Scenario 1, but these are generally very minor in nature and the existing levels already fall short of the BRE Guidelines recommendations. For Scenario 2, there would be no material additional alterations beyond those set out as a result of Scenario 1.

1.19 With regard to overshadowing assessments, AY has reviewed the Site and consider that there are no public or private amenity spaces situated within the near vicinity to the Site to experience any material overshadowing effects. AY has therefore not undertaken any detailed overshadowing assessments for this Report.

2. Introduction

2.1 AY has been instructed to advise on daylight and sunlight matters in relation to a Section 73 Minor Material Amendment Planning Application for the redevelopment of the Great Ormond Street Hospital (illustrated at Figure 1 below), to provide a new Children's Cancer Centre (Figure 02 below). The GOSHCCC consented scheme is illustrated at Figure 03 below.

2.2 Improving outcomes for cancer is a major priority for the UK and paediatric cancer is assuming increasing importance. The proposed GOSHCCC would create a national resource for children with rare and difficult-to treat cancers. GOSH has a vision for the centre – to create facilities where our expert clinicians could improve outcomes for children through holistic, personalised and coordinated care across the child's entire cancer journey.

2.3 The GOSHCCC would be the physical embodiment of this aspiration and would provide inspiring and flexible spaces that can respond to the rapidly changing nature of cancer care and the research landscape, facilitating accelerated adoption of new innovations and models of care.

2.4 The scope of this report is to consider the potential daylight and sunlight effects that may occur to the relevant surrounding properties as a result of the Proposed Development.

2.5 The assessments have been undertaken with regard to national, regional and local planning policy and, the advice and recommendations set out in the BRE Guidelines.

2.6 The Site is located within the Holborn Intensification Area which is, according to the London Planning Data Map:

"Intensification Areas are built up areas with good existing or potential public transport links and can support redevelopment at higher than existing densities. They have significant capacity for new jobs and homes but at a level below that which can be achieved in the Opportunity Areas."

2.7 As the Site is located within an 'Area of Intensification' and a dense urban environment, a detailed study has been undertaken with regards to the levels of daylight enjoyed in the area. Five existing nearby residential properties have been identified and individually assessed. These alternative targets levels have therefore been used when considering the overall acceptability of the Proposed Development.

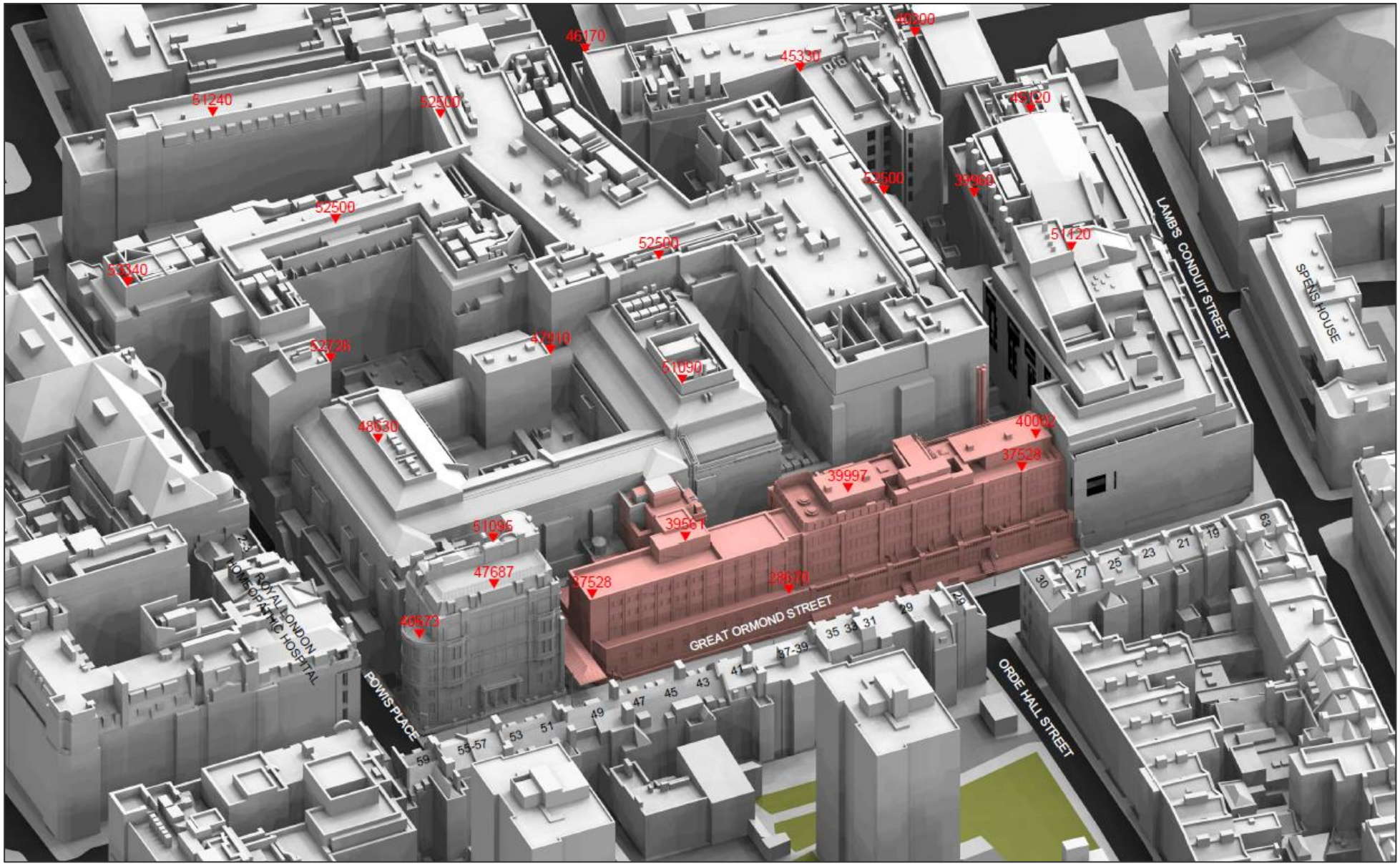


***Figure 1**- Existing Site shaded in red as represented within AY's 3D Model*

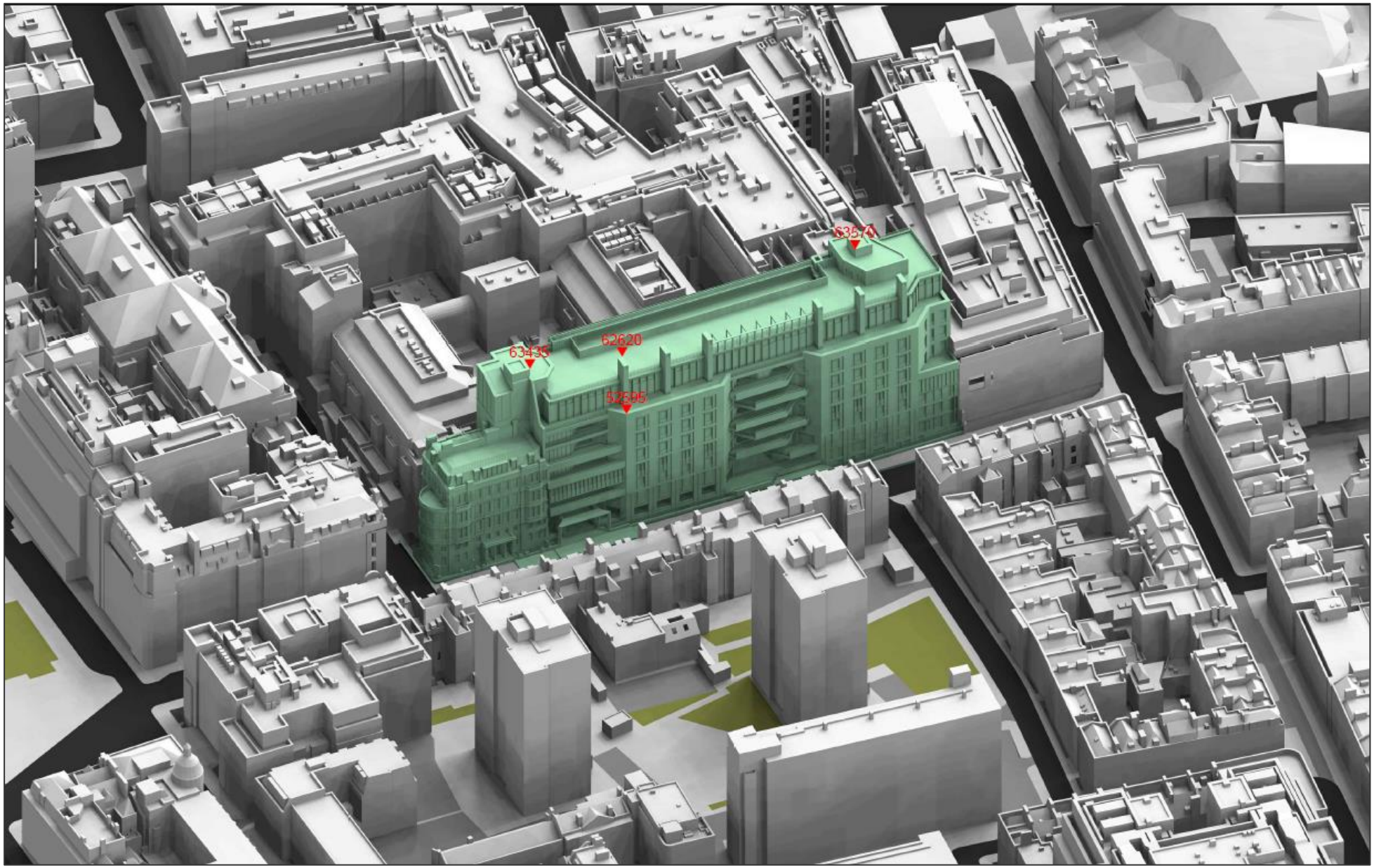


***Figure 2** - Proposed Development shaded in green as represented within AY's 3D Model*

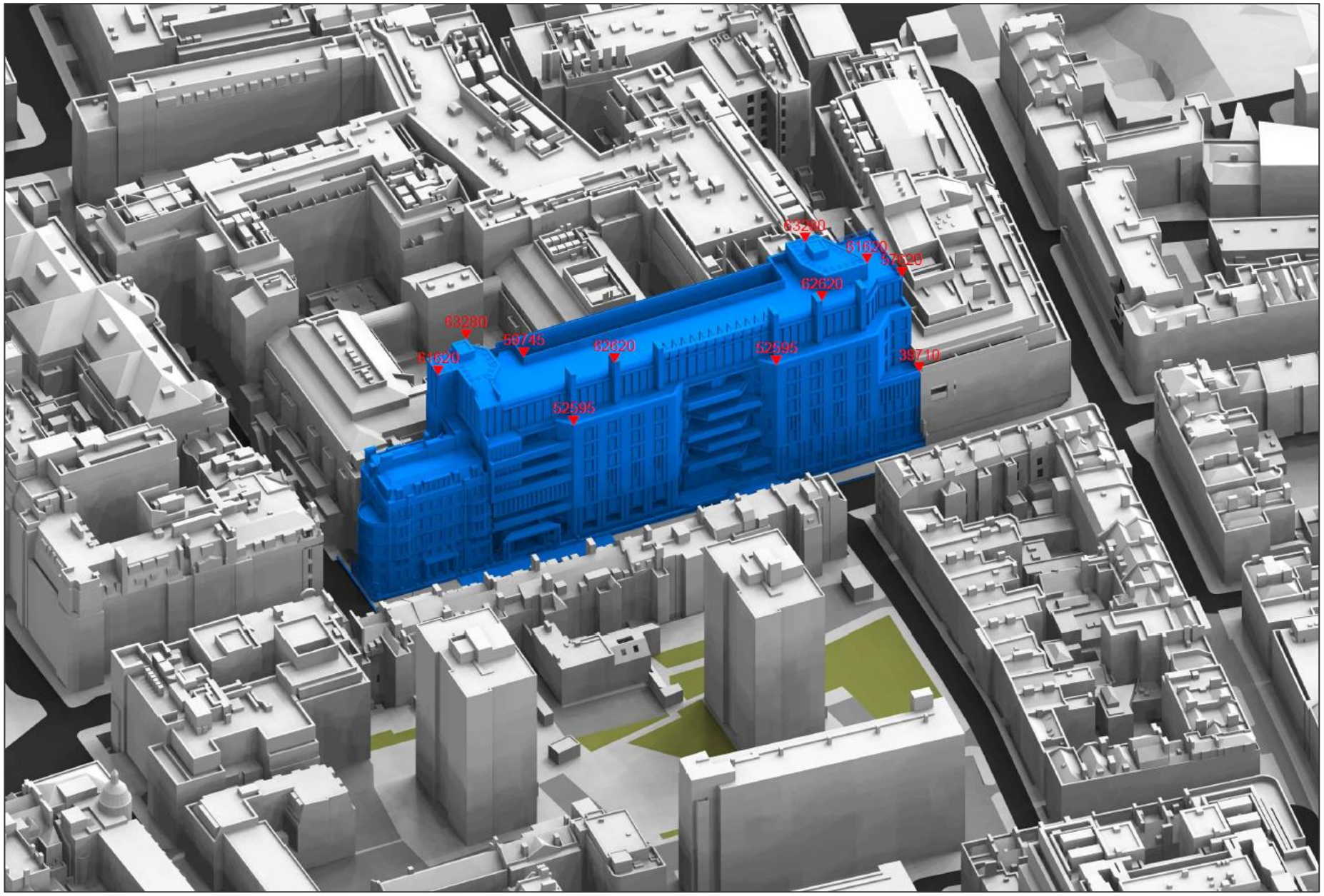


Figure 3 *- Consented Scheme GOSHCCC shaded in blue as represented within AY's 3D Model*

3. Sources of Information and Assumptions

3.1 In order to undertake the daylight and sunlight assessments, a 3D computer model of the existing Site, the Proposed Development, and the surrounding context has been used by AY. This is based upon the following sources of information:

- Google Map and Bing Map aerial and street view imagery.
- Surveys and 2D topographical survey of the Site and immediate surrounds.
- AccuCities 3D photogrammetry model of the Site and surrounding context.
- Site visits and photography undertaken by AY in April 2022 and May 2022.
- 3D model of the GOSHCCC received from BDP on 3 July 2023.
- LBC online planning portal.
- Floor plans for several neighbouring properties obtained from Great Ormond Street Hospital for Children NHS Foundation Trust.
- Full or partial floor plans for several neighbouring properties obtained from online/public records and internal visits, as identified in this report.

3.2 The scope of neighbouring properties considered has been determined as a reasonable zone which considers both the scale of the Proposed Development and the proximity of those properties which surround and face the Site.

3.3 Best estimates have been made as to the uses within the adjoining properties in terms of commercial and residential usage. These have been estimated from Valuation Office Agency council tax band searches, external observation from AY's site visits and online planning records where available.

3.4 AY has not sought access to neighbouring properties at this point, as is standard practice when assessing daylight and sunlight. However, the Applicant and their design team engaged with local residents as part of the pre-application process and during this consultation period some owners requested that internal surveys were carried out. AY carried out these internal measurements on 12th April 2022, 8th March 2023, and 16th March 2023. The information obtained has been incorporated into the AY's 3D model.

3.5 Where internal layouts have not been acquired, reasonable assumptions as to the internal layouts of the rooms behind the fenestration have been made. Unless the building form dictates otherwise, we have assumed a standard 4.2m deep room for residential properties. Internal layouts are only relevant for the NSL assessment. The primary daylight (VSC) and sunlight (Annual Probable Sunlight Hours ("APSH") assessments are calculated at the window face and therefore do not take into account the room layout.

3.6 Floor levels have been assumed for those adjoining properties. This dictates the level of the working plane which is relevant for the NSL assessment.

3.7 In relation to sunlight analysis, only windows facing within 90 degrees of due south have been considered for the neighbouring properties.

4. Policy and Guidance Context

4.1 Policy and guidance context is important in establishing acceptable levels of amenity. The appropriateness of the Proposed Development should be considered against the following key documents:

- National Planning Policy Framework, 2021.
- National Planning Practice Guidance, 2021.
- Housing SPG, 2016.
- London Plan, March 2021.
- Camden Local Plan, 2017.
- Camden Planning Guidance (Amenity), 2021.
- Camden Planning Guidance (Design), 2021.
- Camden Planning Guidance (Energy efficiency and adaptation), 2021;and
- BRE Guidelines, 2022.

National Planning Policy

National Planning Policy Framework (NPPF), as updated in 2022

4.2 The NPPF gives guidance at government level. It seeks to ensure that the planning system encourages more efficient use of land and avoids building low density homes in accessible urban locations. It promotes a flexible approach in adopting and applying policy and guidance that could inhibit these objectives. Chapter 11 of the NPPF "Making effective use of land" under the sub-heading "Achieving appropriate densities" specifically includes reference to daylight and sunlight at paragraph 125 which states:

…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)

National Planning Practice Guidance (NPPG), 2021

4.3 The NPPG is an online resource for planning practitioners. In respect to daylight and sunlight, the document titled 'Effective Use of Land' (published 2019) states at paragraph 007 (Reference ID 66-007-20190722):

"All developments should maintain acceptable living standards. What this means in practice, in relation to assessing appropriate levels of sunlight and daylight, will depend to some extent on the context for the development as well as its detailed design. For example, in areas of high-density historic buildings, or city centre locations where tall modern

buildings predominate, lower daylight and daylight and sunlight levels at some windows may be unavoidable if new developments are to be in keeping with the general form of their surroundings.

In such situations good design (such as giving careful consideration to a building's massing and layout of habitable rooms) will be necessary to help make the best use of the site and maintain acceptable living standards."

Regional Planning Policy

The London Plan, The Spatial Development Strategy for Greater London, 2021

4.4 The London Plan deals with issues of strategic importance to Greater London taking account of the principal purposes of the Greater London Authority which are promoting economic development, social development and environmental improvement over the next 20-25 years.

4.5 To create successful sustainable mixed-use places GG2 (Making the best use of land) encourages those involved in planning to proactively explore the potential to intensify the use of land to support additional homes and workspaces, promoting higher density development, particularly in locations that are well-connected to jobs, services, infrastructure and amenities by public transport.

4.6 Policy D6 (Housing Quality and Standards) states:

"The design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing and maximising the usability of outside amenity space."

4.7 Policy D3 (Optimising site capacity through the design-led approach) requires new developments to enhance the quality of local places by considering a number of criteria, which include density.

4.8 Policy D3 mentions that buildings and structures should deliver appropriate outlook, privacy and amenity, achieve indoor and outdoor environments that are comfortable and inviting for people to use and help prevent or mitigate the impacts of noise and poor air quality.

4.9 See below the guidance set out in the adopted Housing SPG, 2016, which forms part of the London Plan.

Housing SPG, 2016 (Part of the London Plan)

4.10 Whilst it is acknowledged that the Proposed Development is not a residential scheme, there are a number of principles from the Housing SPG that can be applied to this assessment, and these are detailed below.

4.11 Paragraph 1.3.45 states:

[…] requires new development to avoid causing 'unacceptable harm' to the amenity of surrounding land and buildings, particularly in relation to privacy and overshadowing and where tall buildings are proposed. An appropriate degree of flexibility needs to be applied when using BRE guidelines to assess the daylight and sunlight impacts of new development

on surrounding properties, as well as within new developments themselves. Guidelines should be applied sensitively to higher density development, especially in opportunity areas, town centres, large sites and accessible locations, where BRE advice suggests considering the use of alternative targets. This should take into account local circumstances; the need to optimise housing capacity; and scope for the character and form of an area to change over time.

4.12 Paragraph 1.3.46 states that:

The degree of harm on adjacent properties … should be assessed drawing on broadly comparable residential typologies within the area and of a similar nature across London. Decision makers should recognise that fully optimising housing potential on large sites may necessitate standards which depart from those presently experienced, but which still achieve satisfactory levels of residential amenity and avoid unacceptable harm.

Local Planning Policy

Camden Local Plan (2017)

4.13 The Council has adopted a number of planning documents that together form the development plan for Camden. The Camden Local Plan is the key strategic document in Camden's development plan. It sets out the vision for shaping the future of the Borough and contains policies for guiding planning decisions. The Local Plan was adopted by Council on 3 July 2017. It has replaced the Core Strategy and Camden Development Policies documents. It is now the basis for planning decisions and future development in Camden.

4.14 Policy A1 Managing the impact of development states:

The Council will seek to protect the quality of life of occupiers and neighbours. We will grant permission for development unless this causes unacceptable harm to amenity. We will:
a. seek to ensure that the amenity of communities, occupiers and neighbours is protected;

b. seek to ensure development contributes towards strong and successful communities by balancing the needs of development with the needs and characteristics of local areas and communities;

c. resist development that fails to adequately assess and address transport impacts affecting communities, occupiers, neighbours and the existing transport network; and

d. require mitigation measures where necessary.

The factors we will consider include:

e. visual privacy, outlook;

f. sunlight, daylight and overshadowing.

4.15 Protecting amenity, paragraph 6.3 states:

Protecting amenity is a key part of successfully managing Camden's growth and ensuring its benefits are properly harnessed. The Council will expect development to avoid harmful effects on the amenity of existing and future occupiers and nearby properties or, where this is not possible, to take appropriate measures to minimise potential negative impacts.

4.16 Sunlight, daylight and overshadowing, paragraph 6.5 states:

Loss of daylight and sunlight can be caused if spaces are overshadowed by development. To assess whether acceptable levels of daylight and sunlight are available to habitable, outdoor amenity and open spaces, the Council will take into account the most recent guidance published by the Building Research Establishment (currently the Building Research Establishment's Site Layout Planning for Daylight and Sunlight – A Guide to Good Practice 2011).

4.17 Policy C2 Community facilities states:

The Council will work with its partners to ensure that community facilities and services are developed and modernised to meet the changing needs of our community and reflect new approaches to the delivery of services.
The Council will:
a. seek planning obligations to secure new and improved community facilities and services to mitigate the impact of developments.
b. expect a developer proposing additional floorspace in community use, or a new community facility, to reach agreement with the Council on its continuing maintenance and other future funding requirements;
d. facilitate multi-purpose community facilities and the secure sharing or extended use of facilities that can be accessed by the wider community,
e. support the investment plans of educational, health, scientific and research bodies to expand and enhance their operations, taking into account the social and economic benefits they generate for Camden, London and the UK. In assessing proposals, the Council will also balance the impact proposals may have on residential amenity and transport infrastructure; benefit to the community, including protected groups, unless one of the following tests is met:
i. a replacement facility of a similar nature is provided that meets the needs of the local population or its current, or intended, users;
ii. the existing premises are no longer required or viable in their existing use and there is no alternative community use capable of meeting the needs of the local area.

4.18 Managing the concentration of community uses and addressing the needs of all sections of the community paragraph 4.32 states:

There are significant numbers of health, education, scientific and research facilities in Camden…. These institutions contribute to the local and national economy by supporting enterprise and innovation, the generation of jobs and the procurement of goods and services…. In order for these institutions and enterprises to meet changing standards and requirements and sustain their leading edge, there is often an ongoing need to update and modernise facilities. It is important this is realised in a way which balances the impact on residential amenity, local transport infrastructure and the character of the local area.

Guidance

Camden Planning Guidance (Amenity) 2021

4.19 The Council has prepared this guidance to support the policies in the Camden Local Plan 2017. It is a formal Supplementary Planning Document (SPD), which is therefore a "material consideration" in planning decisions. These documents were adopted on 15 January 2021.

4.20 Paragraph 3.1 states:

The Council aims to protect the quality of life of occupiers and neighbours through Local Plan policy A1 Managing the Impact of Development, which seeks to ensure that development does not cause unacceptable harm to amenity, including in terms of daylight and sunlight.

4.21 Flexible consideration of daylight and sunlight, paragraph 3.14 states,

The Council notes the intentions of the BRE document is to provide advice to developers and decision makers and therefore it should be regarded as a guide rather than policy.

4.22 Paragraph 3.15 states:

While we support the aims of the BRE methodology for assessing sunlight and daylight we will consider the outcomes of the assessments flexibility where appropriate, taking into account site specific circumstances and context.

4.23 Overshadowing, paragraph 7.19 states,

You should consider the design of your proposal carefully so that it does not block sunlight and overshadow windows or open spaces and gardens.

Camden Planning Guidance (Design) 2021

4.24 Extensions, paragraph 5.12 states:

Proposals should assess the impacts of the scheme from a design perspective and the contribution it makes to townscape character including:

- *the effects of the proposal on the amenity of adjacent residential properties with regard to daylight, sunlight, outlook, light pollution/spillage, privacy or the working conditions of occupants of adjacent non-residential buildings.*

Camden Planning Guidance (Energy efficiency and adaptation) 2021

4.25 Making the most of sunlight, paragraph 3.5 states:

Natural light makes buildings more attractive, pleasant, and energy efficient. Building layouts should be designed to maximise sunlight and daylight (below) while taking into account other factors such as overheating and privacy.

Building Research Establishment Guidelines: Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice, BR 209 2022 Edition.

4.26 The BRE Guidelines states that it provides:

advice on site layout planning to achieve good sunlighting and daylighting, both within buildings and in the open spaces between them.

[…] This report is a comprehensive revision of the 2011 edition of Site layout planning for daylight and sunlight: a guide to good practice. It is purely advisory and the numerical target values within it may be varied to meet the needs of the development and its location. Appendix F explains how this can be done in a logical way, while retaining consistency with the British Standard recommendations on interior daylighting.

[…] 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 (see Section 5). 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.

4.27 It is therefore important that the Guidelines are correctly interpreted at face value, by not applying a rigid interpretation of the baseline targets in the Guidelines as the set target criteria regardless of context when assessing new development in more urban locations or when assessing new housing schemes which may include areas with higher levels of density where lower levels of daylight are to be expected.

Daylight and Sunlight Assessment Methodology

4.28 When assessing any potential likely effects on the surrounding properties, the BRE Guidelines suggest that only those windows that have a 'reasonable expectation' of daylight or sunlight need to be assessed. In particular, the BRE Guidelines state at paragraph 2.2.2:

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. The guidelines may also be applied to any existing nondomestic building where the occupants have a reasonable expectation of daylight; this would normally include schools, hospitals, hotels and hostels, small workshops and some offices.

4.29 Commercial properties are generally not treated as having a reasonable expectation of daylight or sunlight. This is because they are usually designed to rely on electric lighting to provide sufficient light by which to work rather than natural daylight or sunlight. In addition to commercial buildings, windows to residential properties which serve non-habitable rooms, such as entrance ways, garages, bathrooms or store rooms, are also considered not to have a reasonable expectation of daylight or sunlight and are therefore not assessed.

4.30 It is also important to note that in urban locations, where townscape issues and urban design dictate the design considerations, a planning balance having regard to daylight and sunlight effects needs to be found. It is, therefore, sometimes necessary to apply the BRE Guidelines guideline criteria flexibly, having regard to a site's location and/or the density of development in the surrounding area.

4.31 There are two detailed methods for calculating daylight recommended in the BRE Guidelines: the VSC and NSL. For sunlight, the APSH method is also provided.

VSC

4.32 The VSC assessment measures the amount of skylight received on a vertical wall or window, following consideration of any visible obstructions e.g. other buildings and boundary walls. It is calculated from the centre of a window on the outside face. The maximum VSC value is almost 40% for a completely unobstructed vertical wall or window. One of the inevitable shortcomings of the VSC is that it does not take account of the size of the window or the size or use of the room served by the window.

NSL (also referred to as 'Daylight Distribution')

4.33 The BRE Guidelines advise that where room layouts are known, the effect on the daylight distribution can be calculated by plotting the NSL. In terms of the neighbouring receptors, it has not been possible to obtain room layouts for all the neighbouring properties and therefore layouts have been assumed where plans were not available.

4.34 The NSL assessment measures the distribution of daylight within a room at the horizontal 'working plane' i.e. desktop height (BRE Guidelines guidance suggests using a working plane height of 0.85m for residential properties). The NSL plots those areas of the working plane which receive direct sky light from those which cannot. This therefore represents those parts within the room where the sky can be seen through the window. This second methodology takes account of both the number and size of windows serving a room. It also takes account of the dimensions of the room and therefore, is most reliable when the actual internal layouts are known.

4.35 For the above daylight tests, the BRE Guidelines suggest that existing daylight may be noticeable/adversely affected if either: windows achieve a VSC below 27% and are reduced to less than 0.8 times their former value; or the existing levels of NSL within the rooms are reduced to less than 0.8 times their former values.

4.36 The VSC and NSL criteria should be applied flexibly and in view of the specific site constraints. For example, where existing light levels are low, even very small light losses can translate into large relative or 'percentage' alterations; however, the perceptible change in daylight may in reality be negligible to the occupants. Equally, where there are low levels of existing obstruction and planning aspirations for increased levels of development, greater effects on daylight and sunlight may be inevitable. This does not mean that retained light levels will necessarily be unacceptable, or out of character, with prevailing levels experienced around such development.

Sunlight (APSH)

4.37 For sunlight, the APSH test calculates the percentage of probable hours of sunlight received by a window or room over the course of a year. With regard to existing adjacent properties, 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.

4.38 The guide suggests that the sunlight to existing dwellings may be adversely affected if the APSH to main living rooms is less than 25% annually, or less than 5% during winter, and reduced to less than 0.8 times its former value; with a loss of sunlight over the whole year greater than 4% APSH in real terms.

5. Site Context

Existing Site Context

5.1 The existing Site 1950's Frontage Building on Great Ormond Street currently houses the outdated cancer accommodation and co-dependent facilities. Referring to Figure 1 above and the AOD heights on the drawing, it will be noted that the existing Site building is generally much lower than the more modern buildings across the wider GOSH estate. The image at Figure 4 below shows the Site (red 'H' marker) and the local context. This shows a variety of street typologies with taller buildings dotted across the area.

Figure 4 *- Site Context (Source: Google Maps)*

5.2 As referenced in the BRE Guidelines at paragraph 1.6, a higher degree of obstruction to neighbouring properties may be unavoidable if new developments are to match the heights of existing buildings. The Proposed Development heights are more reflective of those across the wider estate, which inevitably pose a higher degree of obstruction. In that context, coupled with the proximity of residential neighbouring properties to the Site, it is to be expected that some alterations in light will occur which fall short of the default criteria suggested in the BRE Guidelines. Therefore, strict application of the base guidance values would be unrealistic and could give rise to an inappropriate form of development in this context.

Reasonable Values of Daylight and Sunlight for the Site's Location and Context

5.3 The Site is located within the Holborn Intensification Area according to the London Planning Data Map. In urban locations such as this, where there is necessarily an expectation for higher densities, reductions of daylight and sunlight beyond the BRE Guidelines as a result of redevelopments, including the Proposed Development, are considered likely.

5.4 With the above in mind, the BRE guidelines suggest that it may not be appropriate to apply the general guidance to all development locations but set alternative target values based on the locality and proposed density of the Proposed Development. It is therefore considered appropriate to consider alternative target values based on the density of the local area.

5.5 Moreover, the BRE Guidelines should be applied sensitively to higher density development, especially in the context of larger urban sites, where the use of alternative targets is reasonable. This should take into account local circumstances; the need to provide important buildings, such as the Proposed Development, and scope for the character and form of an area to change over time.

5.6 To establish reasonable alternative target values for daylight (VSC) AY has considered the levels of daylight to five residential buildings in the local area, the locations of which have been numbered in Figure 5 below, to understand the levels of VSC they currently enjoy. AY has chosen these five properties as they are each understood to be of residential use fronting onto the street and positioned opposite a large building. The five properties/streets are:

- Site 1 - Bevan House, Boswell Street, WC1N 3BT
- Site 2 – Selwyn House, Guilford Street, WC1N 1DJ
- Site 3 – Russell Court, Woburn Place, London WC1H 0NL
- Site 4 - 51-57 Gower Street, London, WC1E 6HJ
- Site 5 - Witley Court, Coram Street, London, WC1N 1HD

5.7 The levels of VSC have been established through façade map studies. These use a topographical photogrammetry 3D model of the area and calculates the VSC to a 500mm grid placed across the vertical façades. The façades are coloured depending on the VSC result for each section of the grid.

5.8 For each of the façades to these residential buildings AY has considered at the frequency of the VSC values across all floors, as well as the averages across certain elevations. These have enabled AY to establish suitable comparable figures.

5.9 The results of the assessment are discussed below.

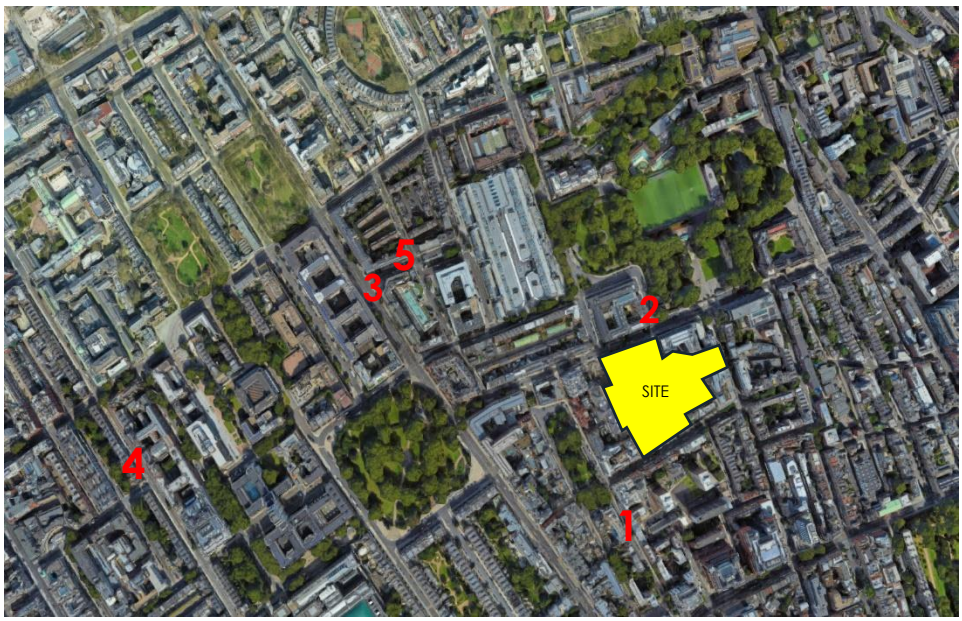


***Figure 5** – Image Showing the Locations of the Comparable Sites*

Site 1

5.10 Site 1, Bevan House, is located approximately of 160m to the south-east of the Site. The frequency of the retained VSC values to this property are shown below:

***Figure 6** – Site 1 Google Street view (bottom image) and Façade Map (top image)*

5.11 As can be seen in Figure 6 above, the VSC values for the facade is no more than c. 10% at ground, early and mid-teens at first and around late teens to early twenties at second floor level. Therefore, virtually all of the elevation assessed does not achieve the BRE Guidelines recommended 27% VSC. This is not surprising bearing in mind 27% VSC is predicated on a suburban model.

5.12 In the previously mentioned Whitechapel Estate appeal case, the VSC figures showed that a proportion of residual values in the mid-teens have been found acceptable in major developments across London. This echoed the Mayor's endorsement in the Inspectorate's appeal decision at Monmouth House, Islington (Planning Application Reference Number P2015/3136/FUL), that VSC values in the mid-teens are acceptable in an inner urban environment. However, as cited by the Inspector in the Whitechapel Appeal case, they also showed a smaller proportion in the bands below 15%. Such daylight levels have been accepted in many desirable central areas for well over a century. Site 1 and the remaining sites discussed below show that VSC values below 15% are common across denser parts of London.

Site 2

5.13 Selwyn House, Guilford Street is located to the north of the Proposed Development approximately 150m away. The frequency of the retained VSC values to this property for the ground, first and second floors are shown below:

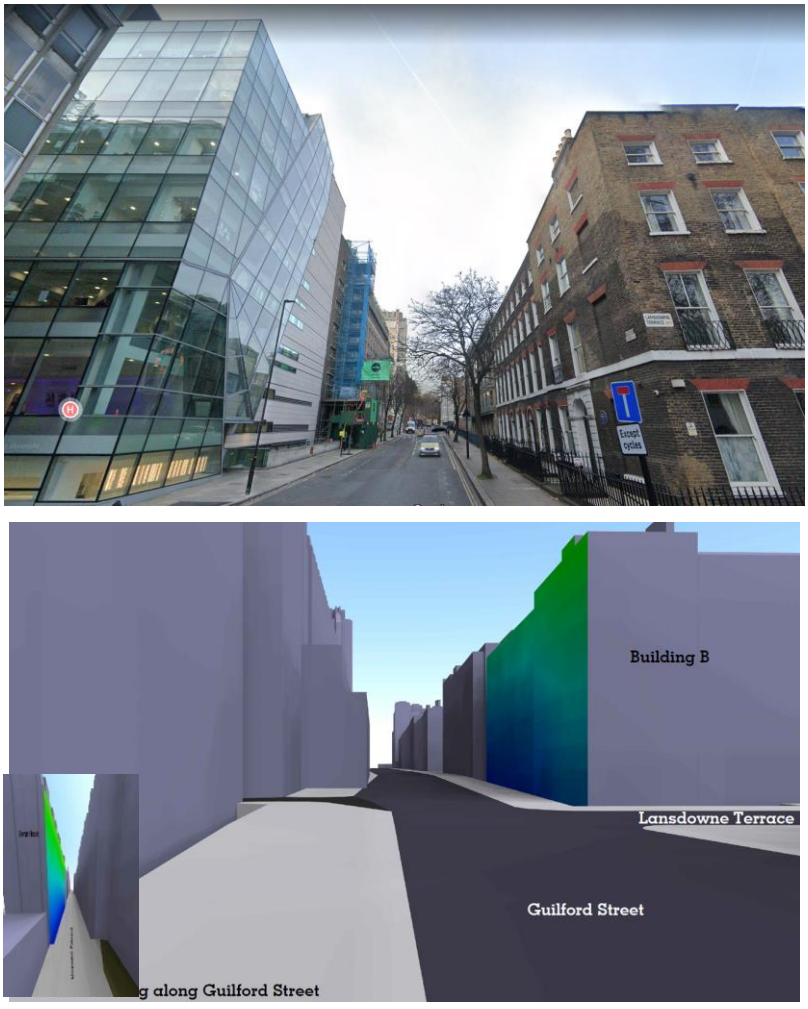


Figure 7 *– Site 2 Google Street view (top image) and Façade Map (bottom image)*

5.14 As can be seen in Figure 7, the VSC values for these facades are c. 10% at ground, slightly above this at first floor and around late teens to early twenties at second floor level.

Site 3

5.15 Russell Court, Woburn Place, London WC1H 0NL is located to the north-west of the Proposed Development approximately 375m away. The frequency of the retained VSC values to this property for the ground, first and second floors are shown below:

***Figure 8** – Site 2 Google Street view (top image) and Façade Map (bottom image)*

5.16 As can be seen in Figure 8, the VSC values for these facades are no more than c. 10% at ground, early to mid-teens at first and around late teens to early twenties at second floor level.

Site 4

5.17 51-57 Gower Street, London, WC1E 6HJ is located to the north-west of the Proposed Development approximately 750m away. The frequency of the retained VSC values to this property for the ground, first and second floors are shown below:

Figure 9 *– Site 2 Façade Map (top image) and Google Street view (bottom image)*

5.18 As can be seen in Figure 9, the VSC values for these facades are no more than c. 10% at ground, early to mid-teens at first and around late teens to early twenties at second floor level.

Site 5

5.19 Witley Court, Coram Street, London, WC1N 1HD is located to the north-west of the Proposed Development approximately 380m away. The frequency of the retained VSC values to this property for the ground, first and second floors are shown below:

Figure 10 *– Site 2 Google Street view (top image) Façade Map (bottom image)*

5.20 As can be seen in Figure 10 the VSC values for the facade are c. 10% for most of the ground, early to mid-teens at first and around late teens to early twenties at second floor level.

Summary

5.21 Whilst it is acknowledged that there will ultimately be a wide range of VSC's across the area, including some values which are in excess of the BRE Guidelines recommendations, a retained VSC of c. 10% at ground and first floor is not without precedent. Areas with this lower level of VSC continue to offer a desirable balance of amenity. Daylight is of course only one of the factors influencing people's enjoyment of where they live and should be considered alongside the range of other amenities such as; location, access to public transport, open space, shops and recreation facilities. This will assist in assessing the degree of weight that should be given to daylight relative to the site's context and access to other amenities in planning applications. This and the alternative VSC targets are therefore an important consideration of the acceptability of the Proposed Development.

5.22 It is possible, therefore, that notwithstanding that a development might result in a noticeable reduction in light, it may be possible to conclude that the impact would nonetheless be acceptable if, in an urban area like London, a proportion of retained daylight levels would be around 15% VSC and above on the upper floors and with a proportion in the bands below 15% VSC on the lower floors.

5.23 Ultimately, whether affected properties would be left with acceptable levels of daylight and in their neighbourhood context, having regard to all relevant planning policies and guidance, is a matter of judgement and opinion.

Neighbouring Properties

5.24 AY has undertaken due diligence to identify the location of potentially sensitive surrounding receptors based on site visits and online research via Valuation Office Agency searches.

5.25 The surrounding properties deemed relevant for assessment are listed below and identified in Figure 11 below.

- 19 Great Ormond Street
- 21 Great Ormond Street
- 23 Great Ormond Street
- 25 Great Ormond Street (GOSH Charity property)
- 27 Great Ormond Street
- 30 Orde Hall Street
- 29 Orde Hall Street
- 29 Great Ormond Street
- 31, 33 and 35 Great Ormond Street
- 37-39 Great Ormond Street
- 41 Great Ormond Street (GOSH Charity property)
- 45 Great Ormond Street (GOSH Charity property)
- 47 Great Ormond Street
- 49 Great Ormond Street
- 51 Great Ormond Street (GOSH Charity property)
- 53 Great Ormond Street
- 55-57 Great Ormond Street (GOSH Charity property)
- 59 Great Ormond Street
- 61 Great Ormond Street (GOSH Charity property)
- Spens House, 72-84 Lamb's Conduit Street

5.26 Some of the neighbouring properties (further detail in section 6 below) comprise design features, such as basement or small windows which limit the available daylight and sunlight and can therefore cause relative reductions in light to be amplified. A larger relative reduction in light may therefore be unavoidable, even if a modest obstruction opposite is proposed. In addition, some of the neighbouring rooms are relatively deep. The BRE Guidelines state that if an existing building contains rooms lit from one side only and deep, then a greater movement of the NSL may be unavoidable.

5.27 As set out in greater detail in section 6 below, based on the floor plans AY has obtained from various sources, some of the neighbouring properties are dual aspect and therefore receive light from front elevations facing the Site and rear elevations which face away from the Site. The rear elevations would not be affected by the Proposed Development, and this is an important mitigating factor.

5.28 In addition, the front elevations of the neighbouring properties on the other side of Great Ormond Street that directly face the Site are oriented north. The windows have therefore been scoped out of our assessment as per the BRE recommendations. The rear elevations face south and would not be affected by the Proposed Development.

5.29 In relation to the neighbouring properties owned by GOSH Charity, the majority of residential accommodation is offered to nursing staff on fixed terms of up to 2 years, while many are on 1-year terms. There are a couple of anomalies of staff who reside there on a permanent basis i.e., the Chaplain.

5.30 AY has considered these contextual matters as relevant factors when reviewing the effects of the Proposed Development.

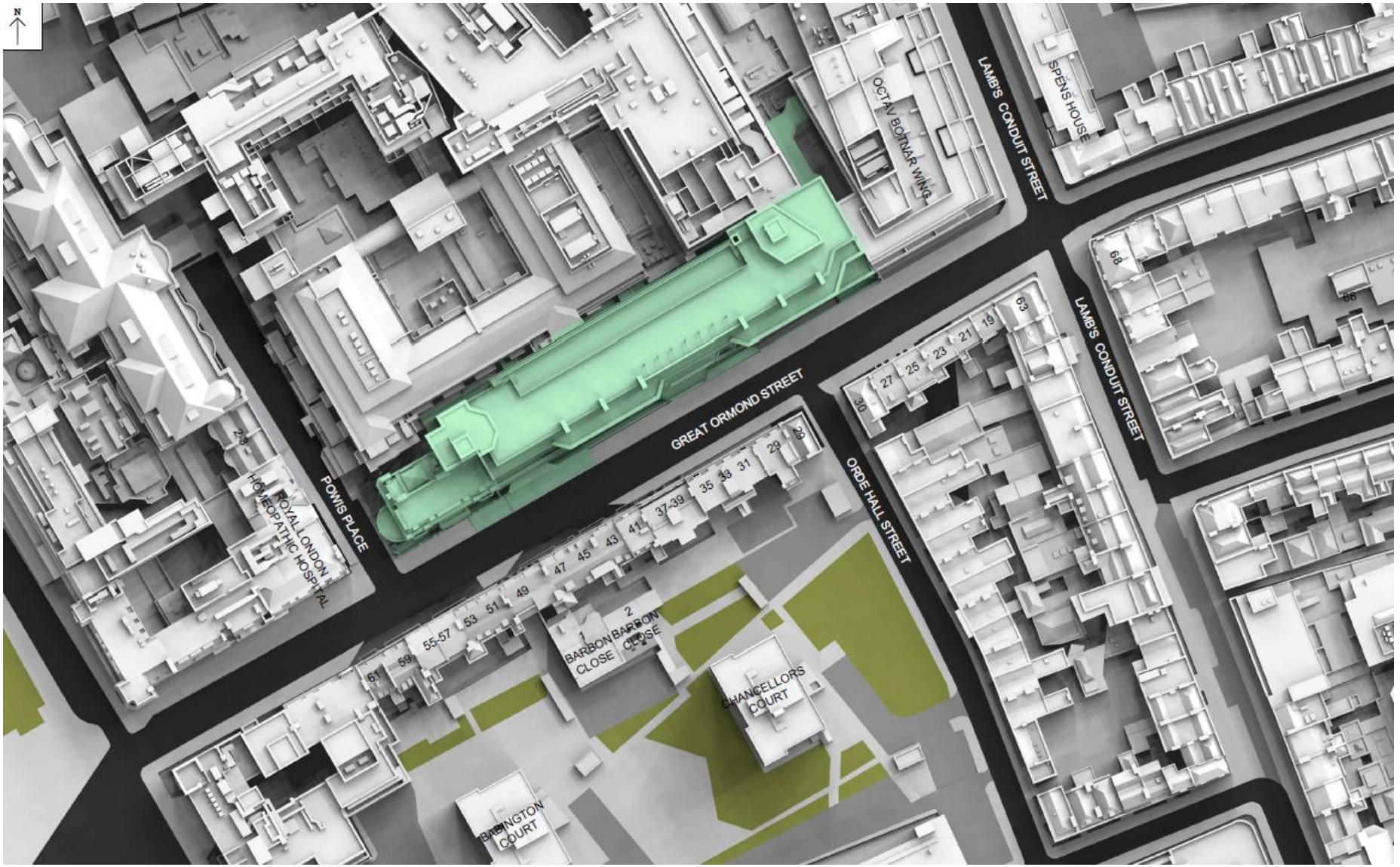


Figure 11 *– AY's 3D model showing the neighbouring properties relative to the Proposed GOSH Site in green*

6. Assessment Results

6.1 A full set of drawings illustrating the location of neighbouring properties and AY's understanding of the existing Site and Proposed Development conditions are attached at Appendix 1.

6.2 The assessment of technical analysis for Scenario 1 (existing vs proposed) is located at Appendix 2, whilst the Scenario 2 (consented vs proposed) results are located at Appendix 5.

6.3 With regard to Scenario 2, Appendix F of the BRE Guidelines sets out alternative target values for assessing daylight and sunlight. Paragraph F2 states the following:

'Sometimes there may be an extant planning permission for a site but the developer wants to change the design. In assessing the loss of light to existing windows nearby, a local authority may allow the vertical sky component (VSC) and annual probable sunlight hours (APSH) for the permitted scheme to be used as alternative benchmarks'.

6.4 Therefore, in accordance with the BRE Guidelines, AY's Scenario 2 assessment focuses on any additional daylight alterations between the consented and proposed scheme. The results demonstrate that none of the neighbouring windows would experience a material additional reduction for VSC. There would be immaterial additional losses to some properties with a maximum additional reduction of 0.51% VSC.

6.5 Whilst the BRE Guidelines (Appendix F) does not mention including a comparison of NSL results to form part of the supplementary assessment, AY have cited the NSL results for completeness. The NSL results indicate that all properties would experience immaterial additional losses, except for two properties (45 and 47 Great Ormond Street), where small additional reductions of up to 4.79% NSL are recorded.

6.6 Technical analysis has determined that the following neighbouring properties assessed (listed below and the locations of which are shown in Figure 11 and Appendix 2) would fully comply with the BRE Guidelines for daylight and sunlight thus experience a negligible impact as a result of the Proposed Development:

- 63 Lamb's Conduit Street.
- 19 Great Ormond Street.
- 53 Great Ormond Street.
- 55-57 Great Ormond Street.
- 59 Great Ormond Street.
- 61 Great Ormond Street.
- 2, 3 Powis Place (possibly comprises of residential accommodation); and

- Spens House, 72-82 Lamb's Conduit Street.

6.7 The remaining properties included within AY's assessment are discussed in further detail below:

21 Great Ormond Street

6.8 This mixed-use property (commercial at ground floor with residential above) is located to the south of the Site. The assessment is based on a set of floor plans dated 1982 obtained from LBC online planning portal.

6.9 The obtained floor plans show that this property is a dual aspect property which receives daylight from both the Site facing northern elevation and southern elevation which faces away from the Site.

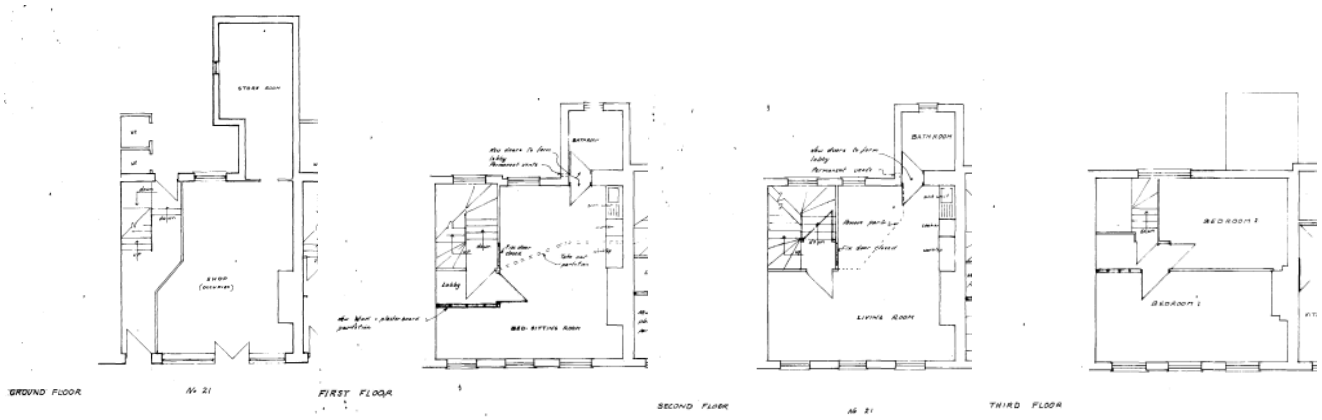


Figure 12 – Floor Plans for 21 Great Ormond Street

Daylight

Scenario 1

6.10 The VSC analysis shows that nine of 11 windows assessed would strictly adhere to the BRE Guidelines.

6.11 The two windows which experience a minor VSC alteration (<22%) are understood to serve two separate rooms, a bedsit at first floor labelled as R1/31 within AY's results and the living room on the second floor labelled R1/32.

6.12 Each of these rooms is understood to be served by three additional windows, two of which are Site-facing and the other window is facing away from the site on the southern elevation of the property.

6.13 The three additional windows to each of these rooms would all meet the BRE Guidelines criteria and all retain a VSC of at least 17% on the first floor; which is broadly in line with the alternative targets as set out in AY's comparable research set out in section 5 above, and a VSC of at least 20% on the second floor, which may be considered as a good level of VSC in an urban location.

6.14 The NSL analysis indicates that all rooms assessed would meet the BRE Guidelines.

Scenario 2

6.15 AY has run a supplementary analysis whereby the consented results are in the baseline. The additional analysis has been included to understand the difference in effects between the consented scheme and Proposed Development.

6.16 The scenario 2 results show that for VSC and NSL, the assessment results would remain consistent with those presented for the consented scheme.

Sunlight

6.17 The north-west facing windows are not oriented within ninety degrees due south and therefore are not considered relevant for assessment.

23 Great Ormond Street

6.18 This residential property is located to the south of the Site. The assessment is based on a set of floor plans dated 1982 obtained from LBC online planning portal.

6.19 The obtained floor plans show that this property is dual aspect and receives daylight from the front and rear elevations. Therefore, some rooms will be served by additional windows which face away from the Proposed Development thus would not be affected.

6.20 The property is comprised of four flats, one on each floor level with the kitchens and bed/sitting rooms facing towards the Proposed Development.

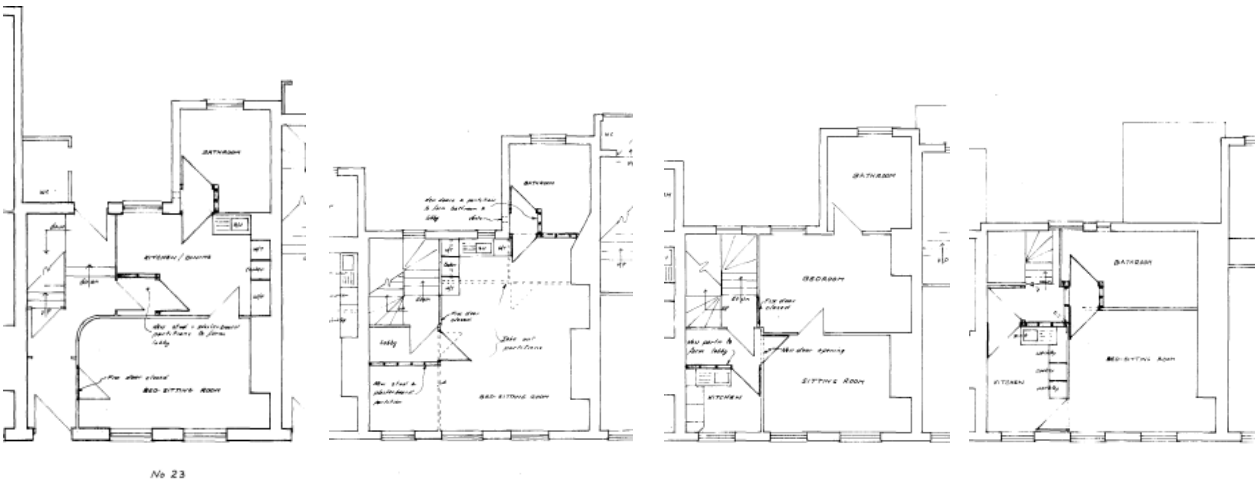


Figure 13 – Floor Plans for 23 Great Ormond Street

Daylight

Scenario 1

6.21 The VSC analysis shows that 11 of the Proposed Development facing windows would experience a VSC alteration beyond that recommended by the BRE guidelines.

6.22 The windows at ground floor which serve a bedsit would retain a VSC of at least 14% which is broadly in line with AY's alternative values.

6.23 The first-floor site-facing windows which again serve a bedsit (dual aspect), would retain a VSC of at least 16% which is in line with AY's alternative values.

6.24 The windows at second and third floor serve two small kitchens, a bedsit and a living room. Each of these windows would retain a VSC of at least 19% which may be considered acceptable for an urban location such as the site.

6.25 In addition to the above, all rooms except for the ground floor bedsit, would retain an NSL of 84% which exceeds the recommended criteria set out within the BRE Guidelines. The bedsit at ground floor will retain an NSL of 53%, which may be considered reasonable for an urban location such as the site.

6.26 Whilst there may be some percentage reductions compared to the baseline situation which would be beyond the BRE Guidelines, the overall effect when considering the retained daylight (VSC and NSL) values could be considered reasonable for the local context.

Scenario 2

6.27 In addition, AY has run a supplementary analysis whereby the consented results are in the baseline. The additional analysis has been included to understand the difference in effects between the consented scheme and proposed scheme.

6.28 The scenario 2 results show that for VSC and NSL, the assessment results would remain consistent with those presented for the consented scheme.

Sunlight

6.29 The north-west facing windows are not oriented within ninety degrees due south and therefore are not considered relevant for assessment.

25 Great Ormond Street (GOSH Charity property)

6.30 This residential property is located to the south of the Site. The assessment is based on a set of floor plans obtained from GOSH, as it owns the property.

6.31 The obtained floor plans show that this property is non-habitable at basement level, with residential uses at ground floor upwards. It is dual aspect and receives daylight from both the front and rear elevations.

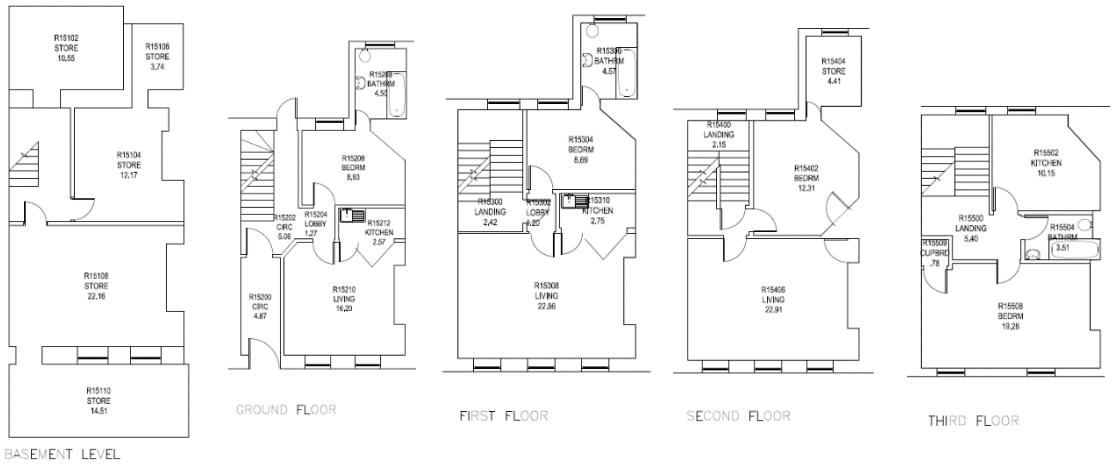


Figure 14 *– Floor Plans for 25 Great Ormond Street*

Daylight

Scenario 1

6.32 The VSC analysis shows that ten of the windows would experience a VSC alteration beyond the recommended target values set out within the BRE guidelines.

6.33 The Site-facing windows at ground floor, which we understand serve a studio, would retain a VSC of at least 13% and therefore would be broadly in-line with AY's alternative values set out in section 5 above.

6.34 The first-floor Site-facing windows which again serve a bedsit (dual aspect), would retain a VSC of at least 15% would be broadly in line with AY's alternative values.

6.35 The windows at second and third floor serve two small kitchens, a bedsit and a living room. Each of these windows would retain a VSC of at least 18% increasing up to 20% on the third floor, which may be considered to be a good level of daylight for an urban area.

6.36 The NSL analysis finds that one of the five rooms assessed, would meet the BRE Guidelines. The remaining four rooms would experience a reduction beyond the BRE guidelines, however, two would retain a NSL in excess of 50% which could be considered reasonable for the urban area.

6.37 The two rooms that do not receive a minimum of 50% NSL are located at basement and first floor level. Room R1/40 at basement level serves an unknown room usage and would receive 22% NSL in the proposed condition. The living room on the ground floor (R2/41) would experience a reduction beyond the BRE Guidelines at 38% and a retains an NSL to 39% of the room's area. It is therefore acknowledged that this room may not be able to see as much sky as received previously; however, as set out within the VSC analysis it would likely enjoy a level of daylight which is commensurate with the local area.

6.38 Whilst therefore there are some percentage reductions compared to the baseline situation which are beyond the BRE Guidelines, the overall effect when considering the retained daylight (VSC) values, could be considered reasonable for the local area.

Scenario 2

6.39 In addition, AY has run a supplementary analysis whereby the consented results are in the baseline. The additional analysis has been included to understand the difference in effects between the consented scheme and Proposed Development.

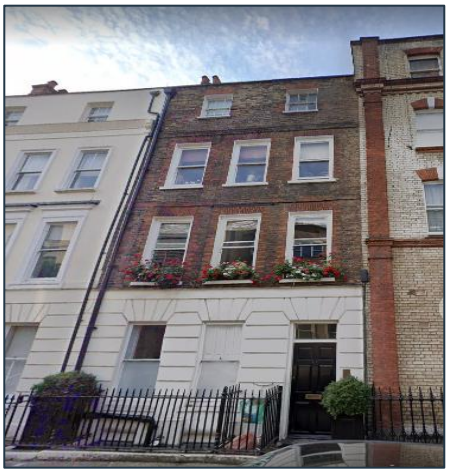
6.40 The scenario 2 results show that for VSC and NSL, the assessment results will remain consistent with those presented for the consented scheme.

Sunlight

6.41 The north-west facing windows are not oriented within ninety degrees due south and therefore are not considered relevant for assessment.

27 Great Ormond Street

6.42 This residential property is located to the south of the Proposed Development. The assessment is based on a set of floor plans dated 1990 obtained from LBC online planning portal.



6.43 The obtained floor plans show that this property is dual aspect and receives daylight from front and rear elevations.

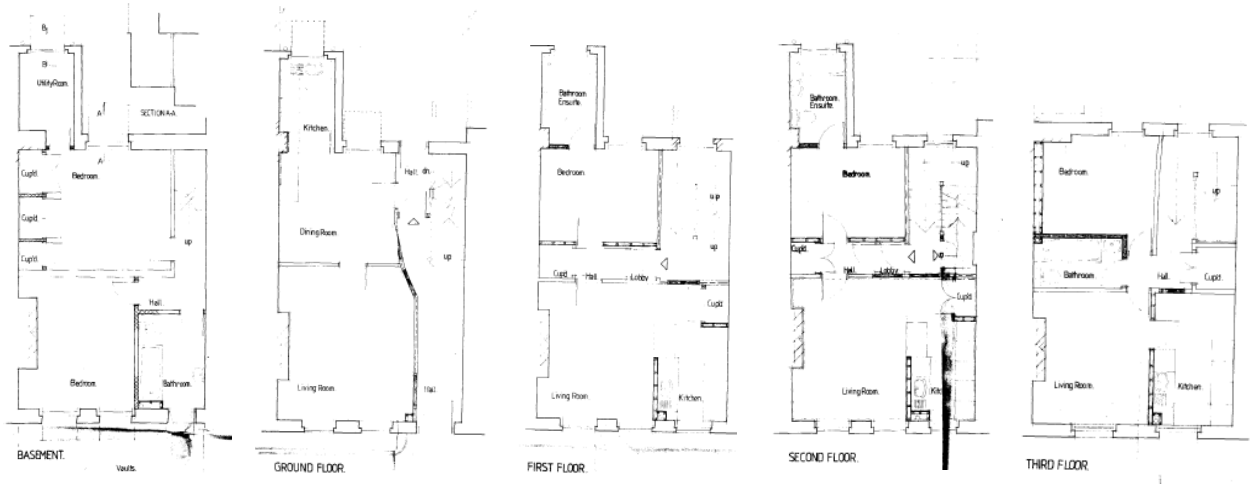


Figure 15 *– Floor Plans for 27 Great Ormond Street*

Daylight

Scenario 1

6.44 The VSC analysis shows that two of the site-facing windows which are located in the basement would surpass the BRE Guidelines criteria.

6.45 The remaining Site-facing windows would experience a VSC alteration beyond that recommended by the BRE Guidelines. However, when looking at the retained VSC values (c. 12% to 18% to the windows at each level) these would be broadly in line with the alterative VSC values set out in section 5 above.

6.46 The NSL analysis finds that none of the rooms would meet the BRE Guidelines. There is a relatively large alteration to these rooms (>40%).

6.47 With the exception of the already poorly lit basement, three rooms retain an NSL area in excess of 50%. The remaining three rooms are located on the ground and third floors, whereby a larger reduction in the amount of sky that can be viewed at working plane level can be seen. However, as discussed above, these rooms should continue to enjoy a level of daylight which is in line with other residential properties in this urban setting.

6.48 Whilst there are some percentage reductions compared to the baseline situation which are beyond the BRE Guidelines, the overall effect, when considering the retained daylight (VSC) values, could be considered acceptable for the local area.

Scenario 2

6.49 AY have run a supplementary analysis whereby the consented results are in the baseline. The additional analysis has been included to understand the difference in effects between the consented scheme and proposed scheme.

6.50 The scenario 2 results show that for VSC and NSL, the assessment results would remain consistent with those presented for the consented scheme.

Sunlight

6.51 The north-west facing windows are not oriented within ninety degrees due south and therefore are not considered relevant for assessment.

30 Orde Hall Street

6.52 This residential property is located to the south of the Site. The assessment is based assumed floor plan layouts, as AY have not been able to obtain any floor plans.

Daylight

Scenario 1

6.53 The VSC analysis shows that one of the Site-facing windows which is located on the third floor will satisfy the BRE Guidelines.

6.54 The remaining windows will experience a VSC alteration beyond that recommended by the BRE guidelines. However, when looking at the retained values of between 10% and 22% VSC, the windows at each level would broadly be in line with the alterative VSC values set out in section 5 above.

6.55 The NSL analysis finds that each of the five rooms assessed would meet the BRE Guidelines.

6.56 Whilst there are some percentage reductions compared to the baseline situation which are beyond the BRE Guidelines for VSC, the overall effect, when considering the retained daylight values, may be considered reasonable for an urban location such as the site.

Scenario 2

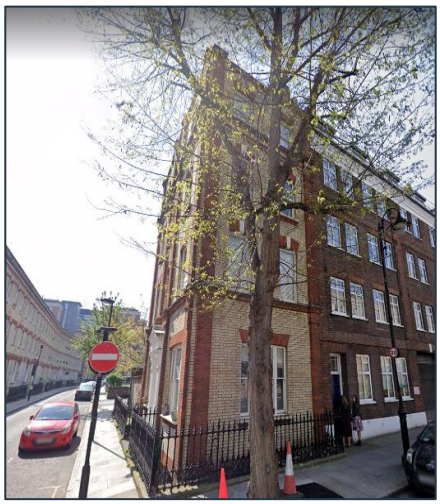
6.57 AY have run a supplementary analysis whereby the consented results are in the baseline. The additional analysis has been included to understand the difference in effects between the consented scheme and proposed scheme.

6.58 The scenario 2 results show that for VSC and NSL, the assessment results would remain consistent with those presented for the consented scheme.

Sunlight

6.59 The north-west facing windows are not oriented within ninety degrees due south and therefore are not considered relevant for assessment. The south-west facing windows are relevant for assessment and all of these meet the BRE Guidelines APSH and winter sunlight recommendations.

29 Orde Hall Street



6.60 This residential property is located to the south of the Site. The assessment is based assumed floor plan layouts, as AY has not been able to obtain any floor plans.

Daylight

Scenario 1

6.61 The VSC analysis shows that each of the Site facing rooms would have at least one window which would satisfy the BRE Guidelines reduction criteria (5 windows in total). It can therefore be concluded that whilst some of the secondary windows may experience some reductions beyond the BRE Guidelines, each of the rooms as a whole should continue to enjoy reasonable levels of daylight for an urban area.

6.62 The NSL analysis finds that all five rooms would meet the BRE Guidelines.

6.63 Whilst there are some percentage reductions compared to the baseline situation which are beyond the BRE Guidelines for VSC, the overall effect when considering the retained daylight values may be considered reasonable for an urban area.

Scenario 2

6.64 AY have run a supplementary analysis whereby the consented results are in the baseline. The additional analysis has been included to understand the difference in effects between the consented scheme and proposed scheme.

6.65 The scenario 2 results show that for VSC and NSL, the assessment results would remain consistent with those presented for the consented scheme.

6.66 **Sunlight**

6.67 The north-west facing windows are not oriented within ninety degrees due south and therefore are not considered relevant for assessment.

29 Great Ormond Street

6.68 This residential property is located to the south of the Site. AY attended this property on 16th March 2023 and measured the layouts of Flats 1, 2 and 5. It is understood that Flats 3 & 4 have the same layout as Flat 2. These layouts have therefore been adopted within our analysis.

Daylight

Scenario 1

6.69 The VSC analysis shows that none of the 17 windows tested would satisfy the BRE Guidelines. Of the windows which fall short, there is a relatively large alteration (>40%). Each of the ground floor windows retain at least 9% VSC, whilst the first floor and above retain between 10%-17% VSC. As shown within the comparable research in section 5, similar levels of VSC are not unusual in an urban context.

6.70 The NSL analysis finds that none of the nine rooms would meet the BRE Guidelines with a relatively large alteration (>40%) to all rooms. All rooms retain an NSL area of between 21%-50%. Therefore, partial views of the sky within all rooms would be maintained, albeit at level which is below the BRE Guidelines recommendations.

6.71 Whilst there are percentage reductions compared to the baseline situation which are beyond the BRE Guidelines, and which may be noticeable, this is not unusual in an urban location such as the site.

Scenario 2

6.72 AY have run a supplementary analysis whereby the consented results are in the baseline. The additional analysis has been included to understand the difference in effects between the consented scheme and proposed scheme.

6.73 The scenario 2 results show that for VSC and NSL, the assessment results would remain consistent with those presented for the consented scheme.

Sunlight

6.74 The north-west facing windows are not oriented within ninety degrees due south and therefore are not considered relevant for assessment.

31, 33 and 35 Great Ormond Street

6.75 This mixed-use property is located to the south of the Site. AY attended this property on 16th March 2023 and measured the layouts of the entire ground floor, Flat 2 on the first floor, Flat 4 on the second floor, Flat 7 on the third floor and Flat 9 on the fourth floor. It is understood that Flats 2,5 & 6 have the same layout as Flat 4 and Flat 8 has the same layout as Flat 9. These layouts have therefore been adopted within AY's assessment.

6.76 The ground floor windows are understood to serve an office for the landlord and have therefore been scoped out of the assessment.

Daylight

Scenario 1

6.77 The VSC analysis shows that none of the windows tested would satisfy the BRE Guidelines. Of these windows which fall short, there is a relatively large alteration (>40%). The windows retain between 11%-17% VSC, which is broadly comparable with the alterative VSC values set out in section 5 above.

6.78 The NSL analysis finds that none of the 20 rooms would meet the BRE Guidelines, with a relatively large alteration (>40%) to all rooms. The rooms retain an NSL area of 20%-45% and whilst this is below the BRE Guidelines recommendations (80%), partial direct views of the sky are maintained in all rooms.

6.79 Whilst there are percentage reductions compared to the baseline situation which are beyond the BRE Guidelines, and which may be noticeable, this is not unusual in an urban location such as the site.

Scenario 2

6.80 AY have run a supplementary analysis whereby the consented results are in the baseline. The additional analysis has been included to understand the difference in effects between the consented scheme and proposed scheme.

6.81 The scenario 2 results show that for VSC and NSL, the assessment results would remain consistent with those presented for the consented scheme.

Sunlight

6.82 The north-west facing windows are not oriented within ninety degrees due south and therefore are not considered relevant for assessment.

37-39 Great Ormond Street

6.83 This residential property is located to the south of the Site. AY attended this property on the 8 March and 16 March 2023 and measured the layouts for Flats 5, 7 and 8. The remaining layouts are based on a combination of a set of floor plans obtained from LBC and also the measured Site notes obtained.

6.84 The floor plans (shown in Figure 16 below) show that this property is dual aspect with flats facing the Site receiving light from the north and south elevations. The habitable rooms facing south would not be affected by the Proposed Development. The basement windows are assumed to serve non-habitable space.

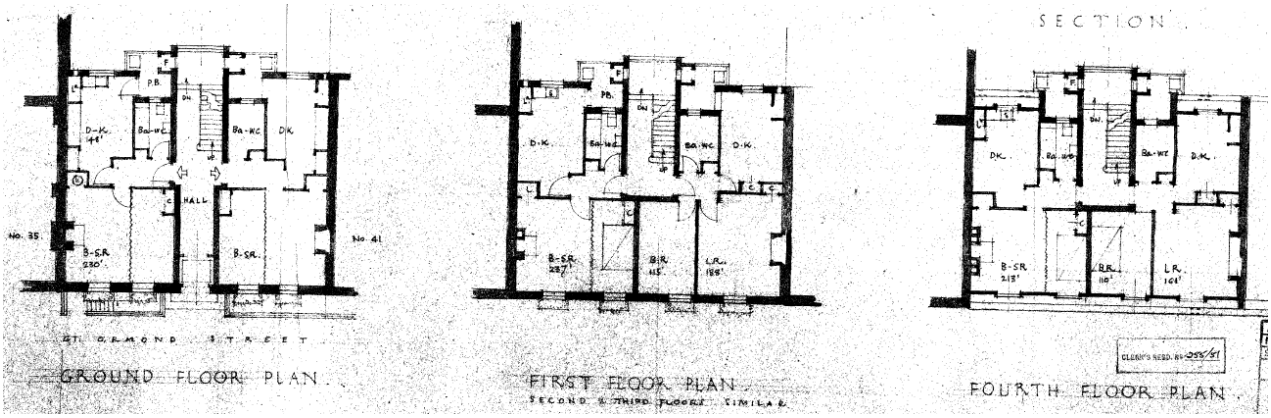


Figure 16 *– Floor Plans for 37-39 Great Ormond Street*

Daylight

Scenario 1

6.85 The VSC analysis shows that 20 of the 22 windows assessed would satisfy the BRE Guidelines. Of the two windows which fall short of the criteria, there is a relatively large alteration (>40%). The ground floor windows and above retain a VSC of c. 9%-16%, which is broadly comparable with the alterative VSC values set out in section 5 above.

6.86 The NSL analysis finds that none of the 22 rooms would meet the BRE Guidelines, with a relatively large alteration (>40%) to all rooms. The rooms retain an NSL area of between 10%-34% and whilst this is below the BRE Guidelines, direct views of the sky are maintained in all rooms.

6.87 Whilst there are percentage reductions compared to the baseline situation which are beyond the BRE Guidelines, and which may be noticeable, this is not unusual in an urban location such as the Site.

Scenario 2

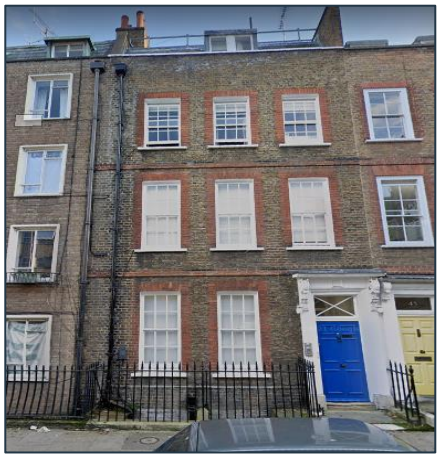
6.88 AY have run a supplementary analysis whereby the consented results are in the baseline. The additional analysis has been included to understand the difference in effects between the consented scheme and proposed scheme.

6.89 The scenario 2 results show that for VSC and NSL, the assessment results would remain consistent with those presented for the consented scheme.

Sunlight

6.90 The north-west facing windows are not oriented within ninety degrees due south and therefore are not considered relevant for assessment.

41 Great Ormond Street (GOSH Charity property)



6.91 This residential property is located to the south of the Site. The assessment is based on a set of floor plans obtained from GOSH.

6.92 The obtained floor plans show that this property is dual aspect and receives daylight from front and rear elevations.

Daylight

Scenario 1

6.93 The VSC analysis shows that two of 12 windows tested would satisfy the BRE Guidelines. Of the windows which fall short of the criteria, there is a relatively large alteration (>40%). The ground floor and above windows would retain a VSC of between 10%-16%.

6.94 The NSL analysis finds that none of the eight rooms, would meet the BRE Guidelines, with a relatively large alteration (>40%) to all rooms. The rooms retain an NSL area of between 20%-37% (with the basement and ground floor being non-compliant in the existing baseline condition) and therefore, direct views of the sky would be maintained to a degree in all rooms.

Whilst there are percentage reductions compared to the baseline situation which are beyond the BRE Guidelines, and which may be noticeable, this is not unusual in an urban location such as the site.

Scenario 2

6.95 AY have run a supplementary analysis whereby the consented results are in the baseline. The additional analysis has been included to understand the difference in effects between the consented scheme and proposed scheme.

6.96 The scenario 2 results show that for VSC and NSL, the assessment results would remain consistent with those presented for the consented scheme.

Sunlight

6.97 The north-west facing windows are not oriented within ninety degrees due south and therefore are not considered relevant for assessment.

45 Great Ormond Street (GOSH Charity property)

6.98 This mixed-use property is located to the south of the Site. The property has office/meeting rooms located at basement and ground floor levels. The residential accommodation is situated at first, second and third floor level. However, we understand the majority of the building is used mostly for meetings. AY's assessment is based on a set of floor plans obtained from GOSH.

6.99 The floor plans obtained show that this property is dual aspect and therefore receives daylight from front and rear elevations.

Daylight

Scenario 1

6.100 The VSC analysis shows that none of the eight windows tested would satisfy the BRE Guidelines, with a relatively large alteration (>40%) to all windows. The first, second and third floor windows retain between 12%-17% VSC, which is broadly comparable with the alterative VSC values set out in section 5 above and may not be unreasonable in an urban context.

6.101 The NSL analysis finds that none of the six rooms, would meet the BRE Guidelines, with a relatively large alteration (>40%) to all rooms. The rooms retain an NSL area of between 23%-43% and therefore, some direct views of the sky would be maintained albeit below the BRE Guidelines recommended target.

6.102 Whilst there are percentage reductions compared to the baseline situation which are beyond the BRE Guidelines, and which may be noticeable, this is not unusual in an urban location such as the site.

Scenario 2

6.103 AY have run a supplementary analysis whereby the consented results are in the baseline. The additional analysis has been included to understand the difference in effects between the consented scheme and proposed scheme.

6.104 The scenario 2 results show that for VSC, the assessment results would remain consistent with those presented for the consented scheme.

6.105 For NSL, three of the rooms assessed would experience an increased actual reduction of up to 4.79% NSL, which in AY's opinion, is a small additional change and is unlikely to be noticeable.

6.106 To conclude, there would be no additional material alteration for VSC and a small additional alteration for NSL. In addition, this property is one of the Charity owned properties and AY we understand that the majority of the building is used for meetings to take place.

Sunlight

6.107 The north-west facing windows are not oriented within ninety degrees due south and therefore are not considered relevant for assessment.

47 Great Ormond Street

6.108 This residential property is located to the south of the Site. The assessment is based on a set of floor plans obtained from online sources.

6.109 The obtained floor plans show that this property is dual aspect and receives daylight from front and rear elevations.

Daylight

Scenario 1

6.110 The VSC analysis shows that two of the ten windows assessed will satisfy the BRE Guidelines. Of the windows which fall short, there is a relatively large alteration in VSC (>40%). However, the ground floor and above will retain a VSC of between 11%-17%, which is broadly comparable with the alterative VSC values set out in section 5 above.

6.111 The NSL analysis finds that none of the six rooms would meet the BRE Guidelines. Of these rooms which fall short, each would retain an NSL area of between 18%-44% and therefore, direct views of the sky would be maintained albeit below the BRE Guidelines recommended target.

6.112 Whilst there are some percentage reductions compared to the baseline situation which are beyond the BRE Guidelines, and which may be noticeable, this is not unusual in an urban location such as the site.

Scenario 2

6.113 AY have run a supplementary analysis whereby the consented results are in the baseline. The additional analysis has been included to understand the difference in effects between the consented scheme and proposed scheme.

6.114 The scenario 2 results show that for VSC, the assessment results would remain consistent with those presented for the consented scheme.

6.115 For NSL, one of the rooms assessed (R2/134 which is a bedroom located on the third floor) would experience an increased actual reduction of up to 3.41% NSL, which in AY's opinion, is a small additional alteration.

6.116 To summarise, there would be no additional material alteration for VSC and a small additional alteration for NSL. Only one room will experience a material additional NSL reduction, whilst the remaining five rooms assessed would experience immaterial additional alterations.

6.117 **Sunlight**

6.118 The north-west facing windows are not oriented within ninety degrees due south and therefore are not considered relevant for assessment.

49 Great Ormond Street

6.119 This residential property is located to the south of the Site. The assessment is based on a set of floor plans that AY collected from a recent Site visit.

6.120 The floor plans obtained show identify that this property is dual aspect and therefore, receives daylight from the north and south elevations.

Daylight

Scenario 1

6.121 The VSC analysis shows that three of 16 windows assessed would satisfy the BRE Guidelines. Of the windows which fall short, each window would retain a VSC of 11%-19%, which is broadly comparable with the alterative VSC values set out in section 5 above.

6.122 The NSL analysis finds that one of seven rooms would meet the BRE Guidelines. Each room that does not meet the guidelines would retain an NSL area of between 26% - 53% and therefore, direct views of the sky would be partially maintained.

6.123 Whilst there are some percentage reductions compared to the baseline situation which are beyond the BRE Guidelines, and which may be noticeable, this is not unusual in an urban location such as the site.

Scenario 2

6.124 AY have run a supplementary analysis whereby the consented results are in the baseline. The additional analysis has been included to understand the difference in effects between the consented scheme and proposed scheme.

6.125 The scenario 2 results show that for VSC and NSL, the assessment results would remain consistent with those presented for the consented scheme.

Sunlight

6.126 The north-west facing windows are not oriented within ninety degrees due south and therefore are not considered relevant for assessment.

51 Great Ormond Street (GOSH Charity property)

6.127 This mixed-use property (office on basement and ground floor and residential above) is located to the south of the Site. The assessment is based on a set of floor plans obtained from GOSH.

6.128 The floor plans obtained show that this property is dual aspect and receives daylight from both the front and rear elevation.

Daylight

Scenario 1

6.129 The VSC analysis shows that four of the six windows tested would satisfy the BRE Guidelines, with a minor alteration to two windows (<23%) which in turn also retain a good VSC of 15% and 17% respectively.

6.130 The NSL analysis finds that two out of four rooms would meet the BRE Guidelines. The remaining two rooms experience a minor alteration (<27%). In addition, both retain a NSL to over 50% of the rooms area which is considered a reasonable level of daylight distribution for an urban area.

6.131 Whilst there are some percentage reductions compared to the baseline situation which are beyond the BRE Guidelines, the overall effect, when considering the retained daylight values, may be considered reasonable for the urban area.

Scenario 2

6.132 AY have run a supplementary analysis whereby the consented results are in the baseline. The additional analysis has been included to understand the difference in effects between the consented scheme and proposed scheme.

6.133 The scenario 2 results show that for VSC and NSL, the assessment results would remain consistent with those presented for the consented scheme.

Sunlight

6.134 The north-west facing windows are not oriented within ninety degrees due south and therefore are not considered relevant for assessment.

7. Conclusion

7.1 AY have been instructed by Great Ormond Street Hospital for Children NHS Foundation Trust in relation to a Section 73 Minor Material Amendment to the Planning Permission for the Proposed Development at Great Ormond Street Hospital.

7.2 Local policy acknowledges that health, scientific and research facilities in Camden contribute to the local and national economy by supporting enterprise and innovation, the generation of jobs and the procurement of goods and services. In addition, policy supports the investment plans of health, scientific and research bodies to expand and enhance their operations, taking into account the social and economic benefits they generate for Camden, London and the UK. In assessing acceptability, the Council would need to balance these benefits against the effects the Proposed Development may have on residential amenity.

7.3 A development that makes effective use of the Site would give rise to effects upon neighbouring light. In this context, the BRE Guidelines need to be considered with a due degree of flexibility. A flexible approach is always necessary in applying policies or guidance relating to daylight and sunlight where they would otherwise inhibit making efficient use of strategically important development sites, in this case a Children's Cancer Centre, creating a national and international resource for children with rare and difficult-to-treat cancers.

7.4 The existing Site building is generally much lower than the more modern buildings across the Great Ormond Street Hospital estate. The consented and Proposed Development heights are more in keeping with those across the wider estate, which inevitably pose a higher degree of obstruction. In that context, coupled with the proximity of residential neighbouring properties to the Site, it is to be expected that some alterations in daylight and sunlight would occur which fall short of the default criteria suggested in the BRE Guidelines. Therefore, strict application of the base guidance values would be unrealistic and could give rise to an inappropriate form of development in this context.

7.5 To establish a reasonable alternative target value for VSC, AY considered the levels of daylight to five residential buildings on streets in the local area, to understand the levels of VSC they currently enjoy. AY has chosen these properties as they are each understood to be of residential use fronting onto the street and positioned opposite relatively large buildings.

7.6 The results of these assessments showed that a retained VSC of at least c. 10% is not without precedent and areas with this lower level of VSC in London continue to offer a desirable balance of amenity. Indeed, daylight is only one of the factors influencing people's decision or enjoyment of where they live and should be considered alongside the range of other amenities such as location, access to public transport, open space, shops and recreation facilities. This would assist in assessing the degree of weight that should be given to daylight relative to the site's context and access to other amenities in planning applications. This and the alternative VSC targets are therefore an important consideration of the acceptability of the Proposed Development.

7.7 This report considers two scenarios; the effect the latest scheme may have on the neighbouring residential properties (Scenario 1: Existing vs Proposed), and, whether the latest scheme causes any significant additional effects in comparison to the recently consented April 2023 Scheme (Scenario 2: Consented vs. Proposed).

7.8 Technical analysis of the Proposed Development in Scenario 1 has confirmed that some of the neighbouring windows and rooms may experience noticeable/significant daylight alterations, with reference to the standard BRE Guidelines tests of VSC and NSL. Whilst the Proposed Development may have a noticeable effect to many of the neighbouring windows, they would continue to receive levels of daylight (VSC) which are broadly in line with the alternative target values set out within the report.

7.9 In terms of sunlight, the vast majority of windows facing the Site are north-west facing and are not oriented within ninety degrees due south, and therefore are not considered relevant for assessment. A small minority of windows may experience a noticeable alteration, nonetheless, these are generally minor in nature.

7.10 With regard to Scenario 2, each of the neighbouring windows and rooms would not experience an additional actual reduction of more than 0.51% for VSC and 4.79% for NSL. The differences caused by the Proposed Development in comparison to the Consented Scheme are therefore small and should be unnoticeable to the occupants. In terms of sunlight (APSH), the results are comparable with the Consented Scheme.

7.11 With regard to overshadowing assessments, there are no public or private amenity spaces situated within the near vicinity to the Site to experience any material overshadowing effects.

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