FOX COURT, 14 GRAY'S INN ROAD LONDON, WC1X 8HN

DAYLIGHT, SUNLIGHT & SHADOW REPORT

DIRECTOR: BARRY HOOD
CLIENT: GENERAL PROJECTS
DATE: OCTOBER 2023
VERSION: V1
PROJECT: P3150

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Appendices

1 Executive Summary

1.1 This report relates to the effect of redeveloping the site at 14 Gray's Inn Road, London, WC1X 8HN ("the Site"). It specifically considers the effect of the September 2023 Buckley Gray Yeoman (BGY) Architects scheme ("the Proposed Scheme") upon the daylight and sunlight amenity of neighbouring residential properties in accordance with BRE Guidance, and the sunlight to surrounding amenity space.

1.2 There is full technical analysis contained herein, however in summary, 4 of the total 7 assessed neighbouring properties will fully satisfy BRE daylight and sunlight guidance. These being:

- 4-9 High Holborn,
- 30-32 Gray's Inn Road,
- 38 Gray's Inn Road
- 16 Brooke Street

1.3 Of the remaining 3 properties/group of properties:

i. 147-150 Holborn is located to the south of the site. This is a recently constructed part residential scheme built at close proximity to the site. Additionally, elements of the elevation which face the site contain recessed windows/balconies which inhibit sky visibility and therefore daylight in the existing situation. As a result, 24 out of 49 windows will satisfy BRE VSC daylight guidance, whilst 21 out of 26 rooms will meet BRE NSL daylight guidance (with the majority of NSL breaches only being fractionally above the 20% permitted BRE change). There are only 6 windows which face within 90 degrees of due south and are material for consideration and all are BRE compliant. The current building on the development site is constructed from brick which can a very limited ability to reflect light. Detailing a brighter, south facing, façade material on the proposed development has the effect of increasing brightness in the space between the site and the apartments within 147-150 Holborn. As a result, there is not expected to be a noticeable change to the light within this property.

ii. 24-28 Gray's Inn Road is located to the north of the site. It contains 20 windows which serve 20 bedrooms. The outlook from these rooms is currently blocked by a heavy external fire escape stair. This will be removed as part of the submission scheme and replaced with a repositioned external stair. As a result, 18 out of 20 windows will meet BRE VSC daylight guidance. 2 exceed guidance (22% & 38% change compared to a BRE permitted 20%) and 8 windows improve in some cases substantially (up to 131% increase). In terms of NSL daylight, 11 bedrooms will satisfy BRE guidance and 9 will exceed. There are no windows within 90 degrees of due south which are material for consideration in sunlight terms. There are alterations in the extent to which daylight can penetrate into some of the rooms, however there are largely BRE compliant and in some cases material improvements in the amount of light at the window face as a result of removing and relocating the fire escape stair.

iii. To the north of the site, there are a group of residential properties which form the Brookes Court Estate, which experience an isolated breach of BRE Guidance. All 136 windows within the estate will satisfy BRE VSC daylight guidance. 100 out of 101 rooms will satisfy BRE NSL daylight guidance. The exception being 1 kitchen which will have its NSL daylight altered by 31% compared to a BRE permitted 20%. The vast majority of windows and rooms throughout the estate will satisfy BRE daylight guidance. In terms of sunlight 94% of its total assessed rooms meeting BRE sunlight guidance. There are 3 rooms which exceed sunlight guidance, however retained sunlight levels are considered to be reasonable/good for the urban location.

1.4 There are 13 areas of outdoor amenity, both communal and private, which surround the Proposed Scheme. A technical assessment has been undertaken to assess the quantity of sunlight to these spaces, at several times of year, both before and after its construction. On the 21st of March, 3 of the total 13 amenity areas included for assessment will, after the proposed scheme is constructed, exceed BRE Guidance in that they are reduced by more than 20%. Of the 3 areas of amenity space, 1 is a communal area, and 2 are private front gardens. However, by the 21st of April the sunlight is largely restored or little changed from the former sunlight levels which would have been achieved prior to the scheme's construction. By the 21st of May almost all amenity spaces are unchanged from their current levels of sunlight exposure, or where there is modest change, it is to a BRE compliant degree. Any over-shadowing is therefore isolated in its location and short in its duration.

2 Methodology

2.1 To quantify the effects of the Proposed Scheme we have constructed a three-dimensional computer model of the site and relevant neighbouring properties. We have then undertaken technical analysis to measure the light received by neighbouring properties both before and after the Proposed Scheme is constructed.

2.2 In this instance, it has been possible to obtain and incorporate floor plans for many of the properties surrounding the Site. However, where floorplans were not readily available, our analysis model and, therefore, our analysis results have been based upon assumed room layouts and dimensions which have largely been informed by window location and external building form. Where no indicators of room depth were available a standard 4m depth has been used.

2.3 It is common practice to assess daylight and sunlight by reference to the guidelines set out in the 2022 Building Research Establishment (BRE) Report 'Site layout planning for daylight and sunlight - A guide to good practice' by Paul Littlefair (the 'BRE Guidelines'). This document is widely accepted by planning authorities as the means by which to consider the effect of development on the daylight and sunlight enjoyed by neighbouring buildings. It is also used to assess daylight and sunlight within new development.

2.4 The BRE Guidelines is a document that is applied across the country. Due to its national application, the framework for designers, practitioners, and planning officials to refer to is a 'one size fits all' approach to the assessment of daylight and sunlight. Theoretically, the methodology and subsequent technical specification offered by the BRE Guidelines is applicable to all manner of built environments, ranging from villages to dense city centres, to areas where significant regeneration is taking place. Notwithstanding the stark disparity between these environments, the suggested target daylight and sunlight values remain consistent despite a suburban setting having very little in common with inner urban locations.

2.5 The BRE Guidelines repeatedly emphasise to the user, whether that be designers, consultants or planning officials to apply the guidelines in a manner that is appropriate for a particular situation. For example, in the introductory summary it states:

"This guide as a comprehensive revision of the 2011 edition of site layout planning for daylight and sunlight. 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 lighting."

2.6 In Section 1: Introduction, at paragraph 1.6 it 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. Although it gives numerical guidelines, these should be interpreted flexibly since natural lighting is only one of the many factors in site layout design. In special circumstances the developer or planning authority may wish to use different target values. For example, in historic city centres 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."

2.7 In relation to the properties surrounding a site, usually the local planning authority will only be concerned with the impact to main habitable accommodation (i.e. living rooms, bedrooms and kitchens) within residential properties. Non-habitable rooms such as bathrooms and hallways have not been considered within this report.

2.8 To determine whether a neighbouring existing building may be adversely affected, the initial test provided by the BRE is to establish if any part of the proposal subtends an angle of more than 25˚ from the lowest window serving the existing building. If this is the case then there may be an adverse effect, and more detailed calculations are required to quantify the extent of any impact.

2.9 The BRE guidelines provide two principal measures of daylight for assessing the impact on properties neighbouring a site, namely Vertical Sky Component (VSC) and No-Sky Line (NSL).

2.10 In relation to sunlight, we examine the BRE Annual Probable Sunlight Hours (APSH); and in relation to sunlight amenity to gardens and amenity spaces, we apply the quantitative BRE overshadowing guidance.

2.11 These measures of daylight and sunlight are discussed in the following paragraphs :-

Diffuse Daylight

2.12 Vertical Sky Component (VSC) – VSC is a measure of the direct skylight reaching a point from an overcast sky. It is the ratio of the illuminance at a point on a given vertical plane to the illuminance at a point on a horizontal plane due to an unobstructed sky.

2.13 For existing buildings, the BRE guideline is based on the loss of VSC at a point at the centre of a window, on the outer plane of the wall.

2.14 The BRE guidelines state that if the VSC at the centre of a window is less than 27%, and it is less than 0.8 times its former value (i.e. the proportional reduction is greater than 20%), then the reduction in skylight will be noticeable, and the existing building may be adversely affected.

2.15 Where there are multiple windows serving a room, an overall VSC can be derived by weighting the VSC for each window in accordance with its window area. This method should not be used where the windows are more than 5m apart.

2.16 No-Sky Line (NSL) - NSL is a measure of the distribution of daylight within a room. It maps out the region within a room where light can penetrate directly from the sky, and therefore accounts for the size of and number of windows by simple geometry. It may be used where the room layouts are known.

2.17 The BRE suggest that the area of the working plane (set at 850mm above the floor) within a room that can receive direct skylight should not be reduced to less than 0.8 times its former value (i.e. the proportional reduction in area should not be greater than 20%).

2.18 It is notable that Appendix F does not recommend the use of NSL where alternative urban daylight targets are used: paragraph F6 says "In assessing the loss of light to an existing building, the VSC is generally recommended as the appropriate parameter to use. This is because the VSC depends only on obstruction and is therefore a measure of the daylit environment as a whole."

Sunlight

2.19 Annual Probable Sunlight Hours (APSH) - In relation to sunlight, the BRE recommends that the APSH received at a given window in the proposed case should be at least 25% of the total available, including at least 5% in winter.

2.20 Where the proposed values fall short of these, and the absolute loss is greater than 4%, then the proposed values should not be less than 0.8 times their previous value in each period (i.e. the proportional reductions should not be greater than 20%).

2.21 The BRE guidelines state that "...all main living rooms of dwellings, and conservatories, should be checked if they have a window facing within 90 degrees of due south. Kitchens and bedrooms are less important, although care should be taken not to block out too much sun. Normally loss of sunlight need not be analysed to kitchens and bedrooms….".

2.22 The APSH figures are calculated for each window, and where a room is served by more than one window the contribution of each is accounted for in the overall figures for the room. The acceptability criteria are applied to overall room-based figures.

Overshadowing

2.23 The BRE Guidelines acknowledge that sunlight in the space between buildings has an important effect on the overall appearance and ambience of a development. It states: *"…good site layout planning for daylight and sunlight should not limit itself to providing good natural light inside buildings. Sunlight in the spaces between and around buildings has an important effect on the overall appearance and ambience of a development."*

Sun on the Ground

2.24 The method for assessing sun on the ground is the 'sun-on-ground indicator'. The BRE Guidelines suggest that the Spring Equinox (March 21) is a suitable date for the assessment.

2.25 Using specialist software, the path of the sun is tracked to determine where the sun would reach the ground and where it would not. This assessment reviews the total percentage of an area that receives at least 2 hours of direct sunlight on the March 21.

2.26 The Guidelines suggest that for a garden or amenity area to appear adequately sunlit throughout the year, no more than half (50%) of the area should be prevented by buildings from receiving 2 hours of sunlight on the 21st of March.

2.27 Given that the outdoor open spaces are predominantly used during warmer months, it is useful to also consider the sunlight potential on other dates during the year.

3 Sources of Information

In the process of compiling this report, the following sources of information have been used:

Point 2 Surveyors
Point Cloud Survey
Site Photography

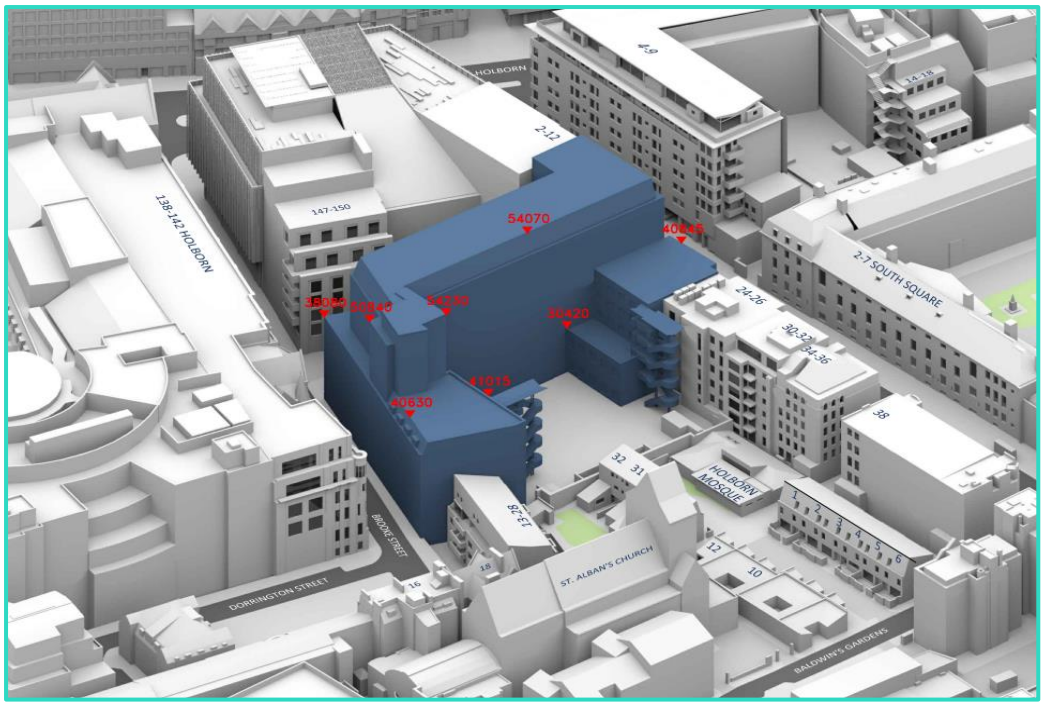
Buckley Gray Yeoman
Proposed Info (received 290923)
1195-BGY-XXX-0000-M3-A-21000_Envelope.rvt

Various Planning Sources
Floor Plans

Land Registry
Official copy entries in respect of all relevant neighbouring surrounding properties

4 The Site

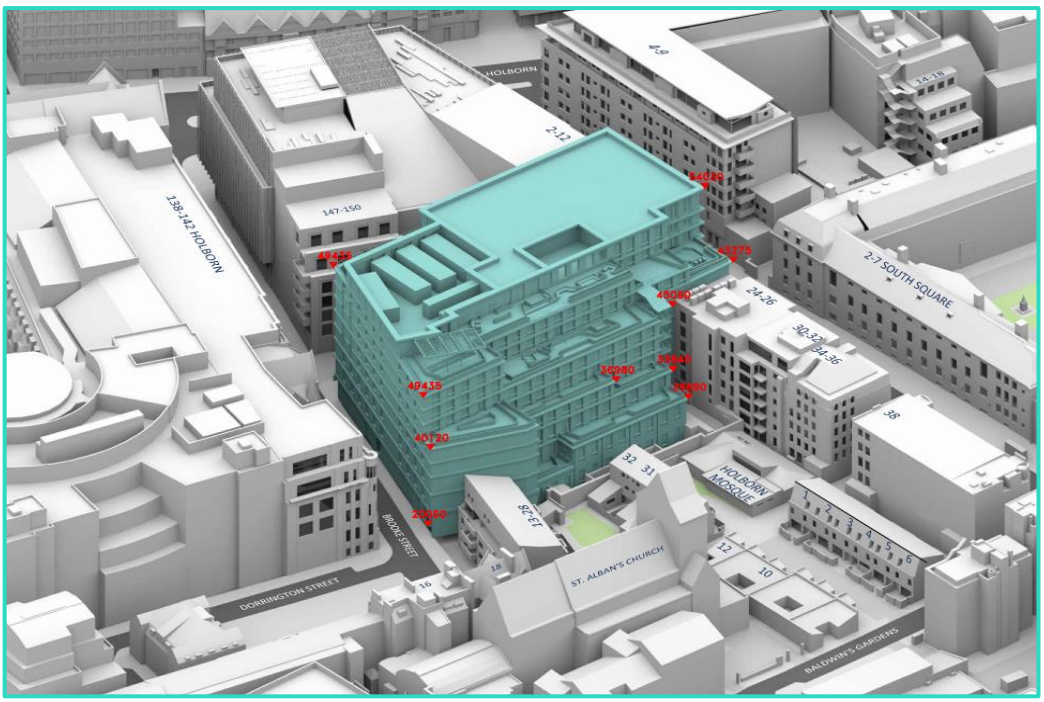
4.1 The site is located in Central London in the London Borough of Camden.



Drawing Number: P3150/03– 3D View - Existing Building within context

4.2 The site location and the existing building which occupies the site can be seen above and within drawings P3150/01-03 which can be found within Appendix A.

5 The Scheme



Drawing Number: P3150/24– 3D View – Proposed Scheme within context

5.1 The Proposed Scheme within context is illustrated above and in drawings P3150/22-24 located in Appendix A.

6 Scope of our Assessment

6.1 The neighbouring residential properties considered in our Daylight and Sunlight assessment are indicated on Plate 1 and listed below.

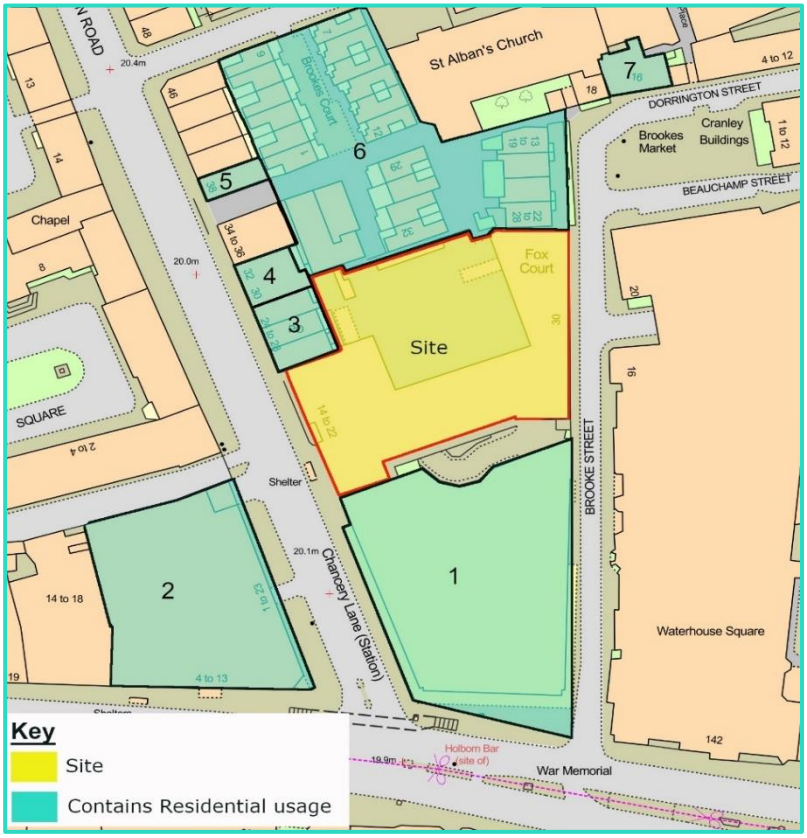


Plate 1 – Site Location Plan within Context

6.2 The following 7 properties have been assessed for daylight and sunlight due to their (partial or full) residential usage

- 147-150 Holborn (no. 1)
- 4-9 High Holborn (no. 2)
- 24-28 Gray's Inn Road (no. 3)
- 30-32 Gray's Inn Road (no. 4)
- 38 Gray's Inn Road (no. 5)
- Brookes Court Estate (no. 6)
- 16 Brooke Street (no. 7)

6.3 An assessment has also been undertaken to assess the quantity of sunlight to 13 areas of outdoor amenity surrounding the Proposed Scheme, before and after its construction. The location of these can be seen in plots P3150/TIS/01 and P3150/TIS/03 in Appendix E.

7 Effect upon Daylight and Sunlight Amenity within Neighbouring Properties

DAYLIGHT AND SUNLIGHT AMENITY WITHIN SURROUNDING RESIDENTIAL PROPERTIES

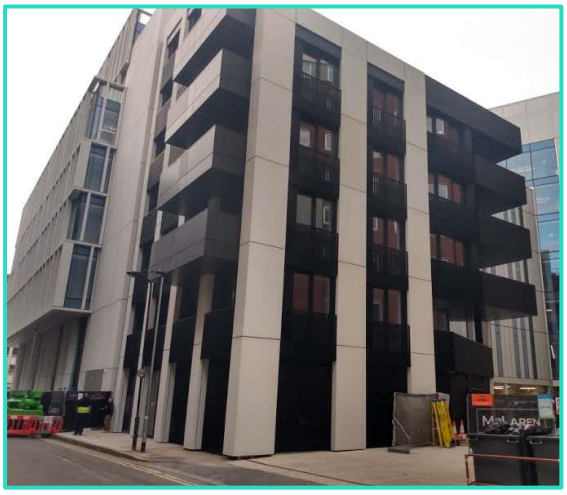
7.1 Detailed technical results for each window/room assessed can be found in Appendix B and C, and corresponding window maps can be found in Appendix D.

7.2 Technical analysis demonstrates that the Proposed Scheme will have a BRE compliant effect upon 4 of the 7 properties listed in the section above, these being: 4-9 High Holborn (2), 30-32 Gray's Inn Road (4), 38 Gray's Inn Road (5) and 16 Brooke Street (7). The effect of the Proposed Scheme will therefore not be noticeable to these properties in Daylight and Sunlight terms.

7.3 The effect upon the remaining 3 properties is more detailed in Daylight and Sunlight terms. A summary of each follows below.

7.4 For the purpose of this summary, reductions in daylight and sunlight between 20-30% are referred to as minor, 30-40% as moderate, and above 40% as material. We have used professional judgment to give an overall effect based upon absolute reduction, retained levels, room use and effect upon the property as a whole. For example, where a property experiences a moderate reduction in NSL and satisfies VSC, we have categorised the overall effect as minor. Likewise, where there is a moderate reduction in sunlight to bedrooms, which the BRE considers less important, we have categorised these as minor based upon room use.

147-150 Holborn (Property no. 1)



7.5 Located to the South of the Site, this modern property is understood to comprise a mix of residential accommodation and commercial space. Floorplans have been located on the Camden Planning Portal and integrated into our computer model to enhance accuracy.

Daylight

7.6 Of the 26 rooms served by 49 windows included for assessment, 7 rooms and corresponding windows (27%) are fully BRE compliant with regards to any alterations in VSC and NSL daylight. The effect to these rooms is considered to be negligible.

7.7 7 rooms and corresponding windows (27%) exceed BRE guidance, experiencing up to a 30% alteration in either NSL and/or VSC daylight. The effect upon these rooms is considered to be minor.

7.8 7 further rooms (27%) experience losses in VSC daylight of between 30-34%. Given that all these rooms are compliant with regards to NSL daylight (except for 2 which experience very minor percentage changes of 20.1% and 21.2%), and that many are served by at least 1 other BRE compliant window, the overall effect is again considered to be minor.

7.9 2 rooms (7.5%), R4/14 and R4/13, are each served by 2 windows, one of which is BRE compliant and the other of which is poorly lit to begin with and experiences an absolute change in VSC of no more than 0.56%. Given these small absolute changes and that each room is either fully compliant with regards to NSL daylight or experiences a minor change in NSL which is only just in excess of the recommended 20% maximum, the overall effect is again considered to be minor.

7.10 This leaves 3 rooms (11.5%), R3/12, R3/13 and R3/14, which experience larger alterations in either VSC and/or NSL daylight. However, VSC alterations where they exceed 40% are disproportionately exaggerated due to the low existing baseline level of light. All 3 rooms are served by at least one window which is located under an overhang and hence this, to some extent, is exacerbated by the building's own design constraints. Further, 2 of the 3 rooms are either NSL compliant or only just in excess of the recommended NSL change of 20%.

7.11 In summary there are breaches of VSC daylight to half the windows (25 out of 49) but only BRE NSL breaches to 5 out of 26 rooms. The degree to which the windows exceed guidance is detailed above and can be seen in the data in Appendix B.

7.12 To consider the brightness within the space between this building and the development site, for the benefit of both buildings, we have undertaken a comparison of the light levels which would be achieved within 147-150 Holborn adopting the BRE's climate-based modelling assessment (CBDM). This methodology incorporates seasonal and meteorological data, position of the sun and the reflectance properties of materials both within the affected rooms and surrounding buildings.

7.13 The proposed scheme has a south facing elevation which faces the residential rooms within 147-150 Holborn which are at close proximity and will benefit from reflected light. Technical analysis was undertaken in 3 scenarios: i) the existing light levels with the existing brick site building; ii) the light levels with the proposed scheme in situ but with a plain brick façade (which is not proposed); iii) the proposed scheme in situ but with a reflective (white) façade. The results are displayed in Lux levels, side by side, in drawings CBDM04, 05 and 06, located in Appendix C.

7.14 A comparison of the light levels illustrated on the left-hand side of the page (CBDM04, 05 and 06) with those on the right side of the page illustrate that the light levels within 147-150 Holborn would be barely affected at all with a more reflective, white (or similar) façade on the south facing elevation of the proposed scheme, and in fact some rooms would witness a small, albeit only technical improvement.

Sunlight

7.15 There are 6 rooms served by 19 windows facing within 90 degrees of due South which were included for sunlight assessment, and all fully meet BRE guidelines with regards to APSH methodology.

24-28 Gray's Inn Road (Property no. 3)

7.16 Located to the immediate West of the Site, this property is understood to be occupied on an Assured Shorthold Tenancy basis above ground floor level.

7.17 Floorplans have been located on the Camden Planning Portal and integrated into our computer model to enhance accuracy. All site facing rooms are bedrooms with the principle habitable living rooms over-looking Gray's Inn Road.

Daylight

7.18 Of the 20 rooms served by 20 windows included for assessment, 10 rooms and corresponding windows (50%) are fully BRE compliant with regards to any alterations in VSC and NSL daylight. The effect to these rooms is considered to be negligible.

7.19 3 further rooms and corresponding windows (15%) fall just short of the recommended guidelines, experiencing up to a 30% alteration in either NSL or VSC daylight. The effect to these rooms is considered to be minor.

7.20 6 further rooms (30%) are fully compliant with regards to VSC daylight (several of which see improvements) but which experience larger reductions in NSL daylight. The reason for this is because this property is currently blocked by a large external fire escape staircase in which there are gaps which enable some intermittent level of sky visibility to the rooms behind. In the proposed situation, the staircase has been removed and completely set back so that it is adjacent to the Proposed Scheme (see Images 02 and 03 below for a comparison). This allows for a lower but more uniform block of massing opposite, enabling more light to the window face but slightly less light to the working plane of the room behind. The overall effect would be moderate but the improvement in outlook would be significant.

7.21 This leaves 1 room (5%), on the top floor which previously looked over the top of the fire escape stair and experiences larger percentage change in both VSC and NSL daylight of up to 39.5%. The room does, however, retain 11.36% VSC.

Image 02: View from room R2/62 in the existing situation

Image 03: View from room R2/62 in the proposed situation

7.22 Overall, there will be either an improvement (and in some cases a significant improvement), or little change in brightness at the window face and therefore in the immediate area of the room adjacent, but for 9 rooms light will travel less deeply into the space. However, the occupants outlook from their bedrooms will also be materially improved by the relocation of the stairwell.

Sunlight

7.23 This property does not have any windows or rooms which face within 90 degrees of due South and hence is not relevant for APSH sunlight assessment.

7.24 The overall effect upon this property's daylight and sunlight amenity is considered to be moderate in respect of the usage of the impacted rooms.

Brookes Court Estate (No. 6)

Daylight

7.25 Located to the North of the Site, this 'property' comprises a Local Authority Housing Estate. Floorplans have been located on the Camden Planning Portal and integrated into our computer model to enhance accuracy.

7.26 The estate has a total of 101 rooms served by 136 windows included for assessment. Of these, 100 rooms and associated windows will be BRE compliant with regards to daylight amenity following construction of the Proposed Scheme.

7.27 The one remaining room (R5/130) is located within 31 Brookes Court and comprises a galley style kitchen. It is poorly lit in the existing scenario and is served by 3 windows, all of which are VSC daylight compliant. It experiences a breach of NSL guidance (31.2% compared to the recommended 20% maximum). Given that the room is not understood to comprise any dining space, it is arguable as to whether it could be considered habitable and thus relevant for assessment. However, it has been the subject of analysis for completeness.

Sunlight

7.28 There are 55 rooms served by 79 windows facing within 90 degrees of due South which were included for sunlight assessment, and all but 3 fully meet BRE guidelines with regards to APSH methodology.

7.29 The 3 remaining rooms (2 of which are understood to comprise bedrooms and the other of unknown usage) experience alterations of annual sunlight in excess of BRE guidance. Retained values sit at between 18% and 23% respectively compared to the recommended 25%, which is not unreasonable for a highly urban location, especially in respect of the bedroom usage.

7.30 The overall effect upon this property's daylight and sunlight amenity is considered to be minor.

Overshadowing

7.31 The BRE Guidelines acknowledge that sunlight in the space between buildings has an important effect on the overall appearance and ambience of a development. It states: "*…good site layout planning for daylight and sunlight should not limit itself to providing good natural light inside buildings. Sunlight in the spaces between and around buildings has an important effect on the overall appearance and ambience of a development*."

7.32 The Guidelines suggest that for a garden or amenity area to appear adequately sunlit throughout the year, no more than half (50%) of the area should be prevented by buildings from receiving 2 hours of sunlight on the 21st of March. If an area cannot meet the 50% sunlit criteria and is reduced by a further 20% of its former value then the loss of sunlight is likely to be noticeable. Technical analysis is undertaken without vegetation.

7.33 We have identified and analysed 13 individual private areas of outdoor amenity in this respect (comprising a mixture of courtyards/gardens/terraces). The location of these can be seen in time-in-sun plots P3150/TIS/01 and P3150/TIS/03, located in Appendix E.

7.34 Plots P3150/TIS/01 and P3150/TIS/03 break down the periods of sun exposure in a very granular way. The areas in dark blue receive no sunlight, the areas in pale blue or green receive some sunlight but which equates to less than 2 hours, whilst the areas in yellow receive at least 2 hours of sunlight throughout the day. The percentage indicates the area of amenity space that can achieve at least 2 hours of sunlight on the date indicated.

7.35 In order to provide a more complete picture of how much sunlight will be receivable to each space throughout the year, we have undertaken some supplementary analysis to show the time-in-sun during not only March but also the months of April, May and June.

7.36 On the 21st of March, 3 of the total 13 amenity areas included for assessment exceed BRE Guidance in that they are reduced by more than 20%.

7.37 2 of these areas comprise the front gardens of 30 and 31 Brookes Court, in which their sunlight is reduced from a modest amount (4% and 30%) receiving over 2 hours of sunlight to none of the space being able to receive more than 2 hours of sunlight. However, the gardens do retain sunlight for between 1 – 90 minutes on March 21st and therefore retain some sense of sunlight. However, both spaces are characterised by mature vegetation (which are omitted from technical analysis as per BRE) which would restrict sunlight in the existing situation in any event.

7.38 The final community amenity area receives at least 2 hours of sunlight to 78% of its total area in the existing situation and experiences a 65% alteration, taking it to 27% in the proposed condition. This space is characterised by the presence of 3 mature trees with wide canopies which will limit the penetration of sunlight in the existing situation.

7.39 By the 21st of April the sunlight is largely restored or little changed from the sunlight levels which would have been achieved prior to the scheme's construction. By the 21st of May almost all amenity spaces are unchanged from their current levels of sunlight exposure, or where there is modest change, it is to a BRE compliant degree.

8 Summary

8.1 When considering the effect of the Proposed Scheme upon the daylight and sunlight amenity within the 7 surrounding residential properties, 4 will fully satisfy BRE guidance. These being:

- 4-9 High Holborn (no. 2)
- 30-32 Gray's Inn Road (no. 4)
- 38 Gray's Inn Road (no. 5)
- 16 Brooke Street (no. 7)

8.2 Of the remaining 3 properties/group of properties:

i. 147-150 Holborn is located to the south of the site. This is a recently constructed part residential scheme built at close proximity to the site. Additionally, elements of the elevation which face the site contain recessed windows/balconies which inhibit sky visibility and therefore daylight in the existing situation. As a result, 24 out of 49 windows will satisfy BRE VSC daylight guidance, whilst 21 out of 26 rooms will meet BRE NSL daylight guidance (with the majority of NSL breaches only being fractionally above the 20% permitted BRE change). There are only 6 windows which face within 90 degrees of due south and are material for consideration and all are BRE compliant. The current building on the development site is constructed from brick which can a very limited ability to reflect light. Detailing a brighter, south facing, façade material on the proposed development has the effect of increasing brightness in the space between the site and the apartments within 147-150 Holborn. As a result, there is not expected to be a noticeable change to the light within this property.

ii. 24-28 Gray's Inn Road is located to the north of the site. It contains 20 windows which serve 20 bedrooms. The outlook from these rooms is currently blocked by a heavy external fire escape stair. This will be removed as part of the submission scheme and replaced with a repositioned external stair. As a result, 18 out of 20 windows will meet BRE VSC daylight guidance. 2 exceed guidance (22% & 38% change compared to a BRE permitted 20%) and 8 windows improve in some cases substantially (up to 131% increase). In terms of NSL daylight, 11 bedrooms will satisfy BRE guidance and 9 will exceed. There are no windows within 90 degrees of due south which are material for consideration in sunlight terms. There are alterations in the extent to which daylight can penetrate into some of the rooms, however there are largely BRE compliant and in some cases material improvements in the amount of light at the window face as a result of removing and relocating the fire escape stair.

iii. To the north of the site, there are a group of residential properties which form the Brookes Court Estate, which experience an isolated breach of BRE Guidance. All 136 windows within the estate will satisfy BRE VSC daylight guidance. 100 out of 101 rooms will satisfy BRE NSL daylight guidance. The exception being 1 kitchen which will have its NSL daylight altered by 31% compared to a BRE permitted 20%. The vast majority of windows and rooms throughout the estate will satisfy BRE daylight guidance. In terms of sunlight 94% of its total assessed rooms meeting BRE sunlight guidance. There are 3 rooms which exceed sunlight guidance, however retained sunlight levels are considered to be reasonable/good for the urban location.

8.3 There are 13 areas of outdoor amenity, both communal and private, which surround the Proposed Scheme. A technical assessment has been undertaken to assess the quantity of sunlight to these spaces, at several times of year, both before and after its construction. On the 21st of March, 3 of the total 13 amenity areas included for assessment exceed BRE Guidance in that they are reduced by more than 20%. Of the 3 areas of amenity space, 1 is a communal area, and 2 are private front gardens. However, by the 21st of April the sunlight is largely restored or little changed from the former sunlight levels which would have been achieved prior to the scheme's construction. By the 21st of May almost all amenity spaces are unchanged from their current levels of sunlight exposure, or where there is modest change, it is to a BRE compliant degree. Any over-shadowing is therefore isolated in its location and short in its duration.