

Camden Regeneration and Planning Department  
5 Pancras Square  
London  
N1C 4AG

FAO: Planning Officer Christopher Smith

22 January 2024



17 SLINGSBY PLACE  
LONDON | WC2E 9AB

Dear Sirs

**RE: PROPOSED REDEVELOPMENT OF 2 WATERHOUSE SQUARE, 140 HOLBORN, LONDON EC1N – DAYLIGHT AND SUNLIGHT ASSESSMENTS IN RELATION TO EVELYN'S BUILDINGS, 16 BROOKES MARKET (ALSO KNOWN AT THE LODGE AND OCCUPIED BY THE ST MUNGO'S HOMELESS CHARITY) APPLICATION REF: 2023/3419/P**

- 1.1. We are instructed by the applicant, the Prudential Assurance Company Limited, to advise on the potential daylight, sunlight and overshadowing impacts that may occur to the surrounding properties and amenity spaces as a result of the proposed redevelopment of 2 Waterhouse Square (the Proposed Development).
- 1.2. Further to our report dated 20 July 2023 and clarification letter dated 20 December 2023, we write to produce an addendum report providing further commentary and supporting information on the daylight and sunlight effects that may occur to The Lodge, 16 Brookes Market occupied by the St Mungo's Homeless Charity.
- 1.3. The daylight and sunlight impacts to The Lodge were considered in the submitted daylight and sunlight report dated 20 July 2023. Within this report the Lodge was referred to as Evelyn's Buildings, Brookes Market. Overall, the conclusions are that the impact on The Lodge will be very small and unnoticeable to the occupants, but further information is set out below.
- 1.4. The Lodge is located to the northwest corner of the Waterhouse Square. The location of the building is labelled No.8 on the plan below and street view image of the front elevation is given at Figure 2.



Figure 1: Site Plan Showing the location of The Lodge (No.8)



Figure 2: Street View of Front Elevation

- 1.5. The Lodge is understood to be occupied by St Mungo's Charity and provides circa 40 rooms for the homeless.
- 1.6. We have found partial floor plans for the building, which when coupled with our external observations indicated that there are communal areas such as offices and a dining room on the ground floor, a sitting room and some bedrooms on the first floor and further bedrooms on the second, third, fourth and fifth floors. Images of the floor plans found are given below.

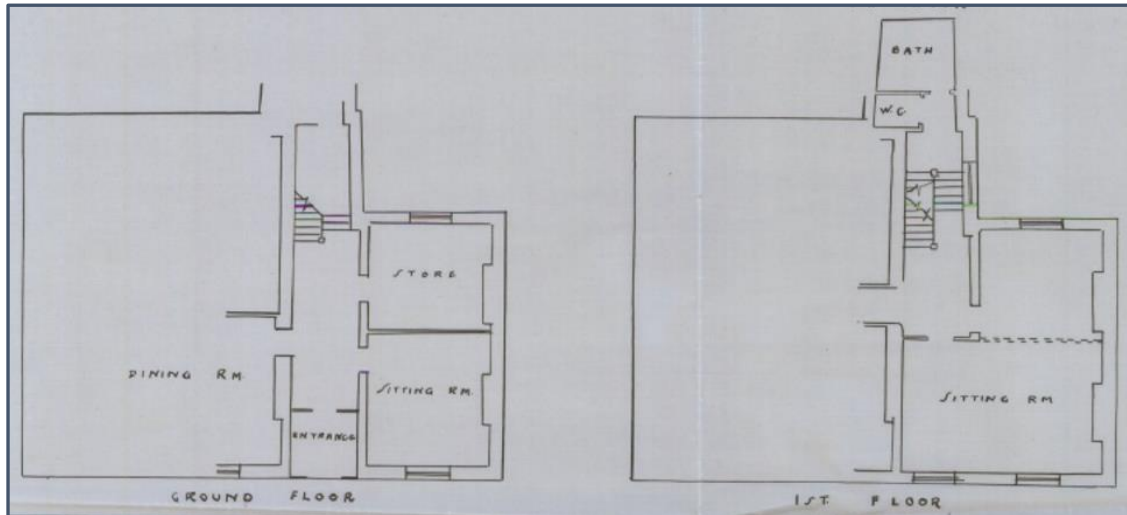


Figure 3: Partial Floor Plans for Ground and First Floors

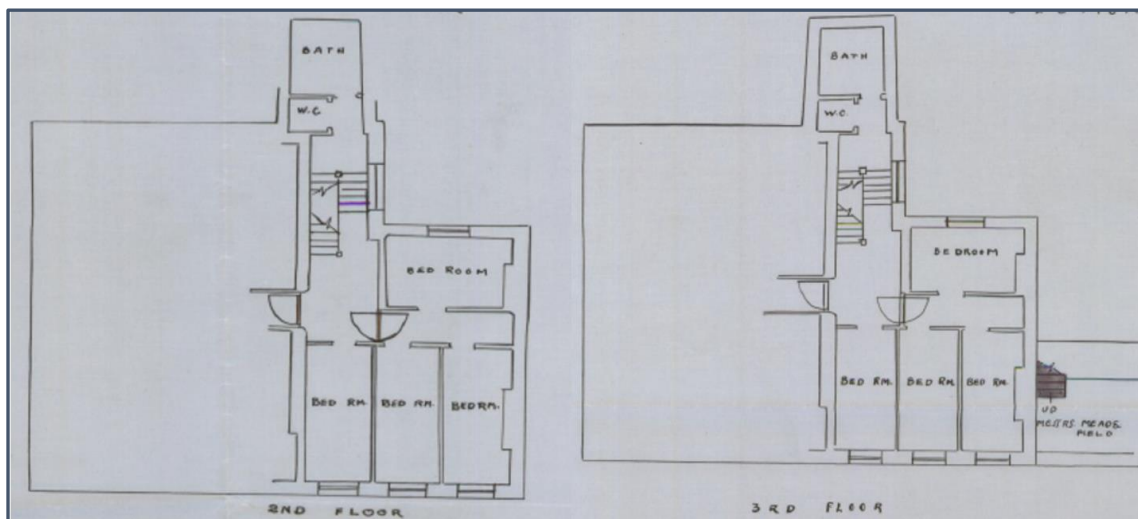


Figure 4: Partial Floor Plans for Second and Third Floors

- 1.7. Given the use of the property, and as the bedrooms are likely to be the only personal space the occupants have, the building is considered to be sensitive to any daylight and sunlight effects. We have therefore assessed The Lodge as if it was a residential building in accordance with the BRE guidelines and considered the impact on each bedroom as if it were a living room given the multiple occupancies of the building.

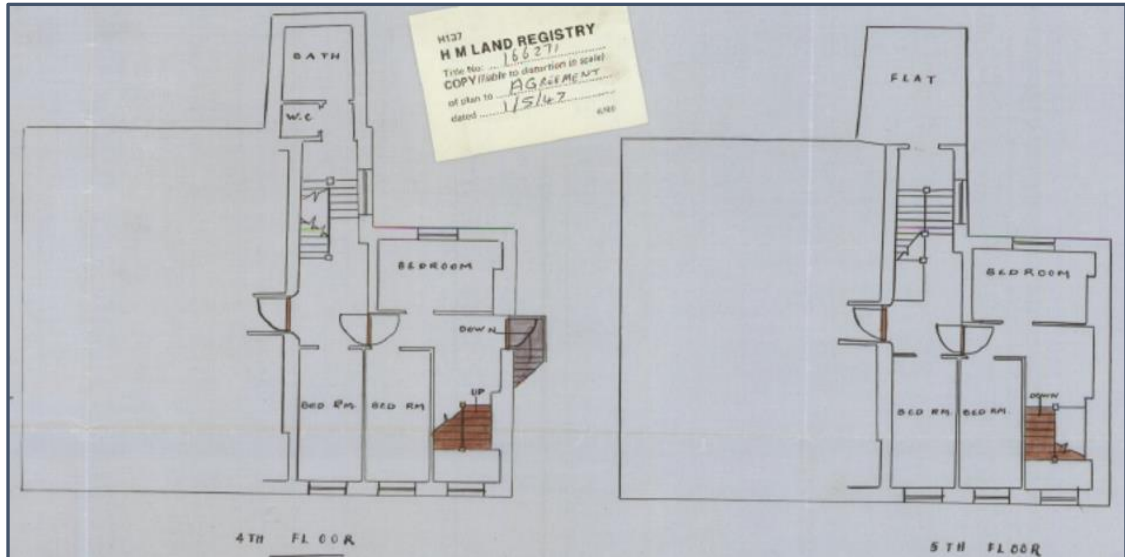


Figure 5: Partial Floor Plans for Fourth and Fifth Floors

- 1.8. Whilst it could be argued that the office areas on the ground floor (evident from external observation) do not need to be assessed, it is recognised that the plans show that the space could be a communal sitting room. All windows to the building have therefore been assessed except for those to the entrance hallway and the staircase windows on the 4th and 5th floors to the eastern side of the building. These windows are highlighted in red at Figure 3 below. This assessment scope is in accordance with the BRE guidelines.

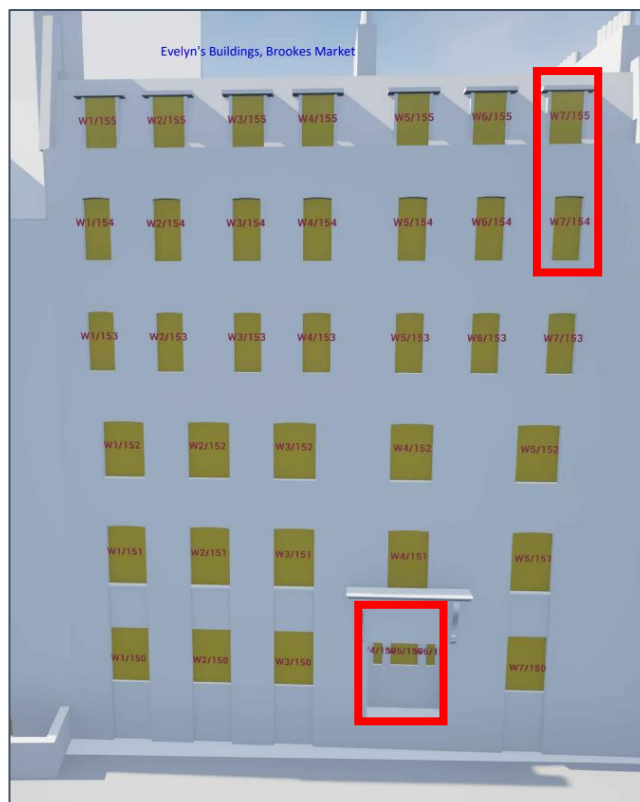


Figure 6: Front Elevation of The Lodge showing the windows in red that were excluded from the assessment as they are understood to serve non-habitable rooms.

## Daylight Assessment Results

- 1.9. In accordance with the BRE guidelines, two daylight tests have been run, the Vertical Sky Component (VSC) test and the No-Sky Line (NSL) test. The NSL test is often regarded as secondary to the VSC test as the NSL results can often be misleading as to the actual effect that may be experienced by an occupant.
- 1.10. The VSC test results show that the maximum percentage reduction as a result of the Proposed Development is 7.31%. As the BRE guidelines suggest that a percentage reduction of up to 20% is unlikely to be noticeable to the occupants, we can be confident to conclude that a percentage reduction of 7.31% or less will create an unnoticeable effect on the building's amenity. A copy of the VSC results is enclosed.
- 1.11. The second daylight test is known as the No-Sky Line (NSL) test. This test considers how the available daylight (measured at the window using the VSC tests) is likely to be distributed within the room. A copy of the NSL results in tabular form, and on plan, are enclosed.
- 1.12. The NSL results show that all rooms except for 7 bedrooms on the third floor (3 bedrooms) and fourth floors (4 bedrooms) will experience percentage reductions within the BRE guidelines. A summary of the NSL and VSC results for these 7 rooms, along the retained percentage NSL area and VSC is as follows:

Floor Level	Room Label	Room Use	% Loss of NSL	Retained NSL Area	% Loss of VSC	Retained VSC
Third	R2/153	BEDROOM	24.6	55%	6.49	26.93%
Third	R3/153	BEDROOM	24.9	55%	6.65	26.81%
Third	R4/153	BEDROOM	24.2	62%	6.71	26.68%
Fourth	R2/154	BEDROOM	28.8	67%	6.24	28.87%
Fourth	R3/154	BEDROOM	28.6	66%	6.44	28.76%
Fourth	R4/154	BEDROOM	20.3	75%	6.52	28.66%
Fourth	R5/154	BEDROOM	20.6	77%	6.54	28.60%

Figure 7: Summary of the No-Sky Line and Vertical Sky Component tests to the 7 rooms that experience reductions beyond the BRE guidelines.

- 1.13. As can be seen from the table above, the percentage reductions in NSL to the 7 rooms that experience reductions beyond the BRE guidelines are between 20.3% and 28.8%. As the results are within 30%, the significance of these effects (when considered in isolation) would be considered minor adverse. When considering if these minor adverse effects can be considered acceptable, consideration of the retained NSL values and the VSC results needs to be given before conclusions can be drawn.
- 1.14. The retained No-Sky Line levels are well above what is typically found across central London (which we consider to be around 50%). In addition, the NSL contour plots show that a good proportion of the room in front of the window will be able to continue to receive some direct daylight.
- 1.15. The VSC results show that the maximum percentage reduction to these 7 rooms is 6.71% which is well within the BRE guidelines recommendations. In addition, the retained levels of VSC are very close to, or above, 27% which is recommended in the BRE guidelines. These levels of

daylight are usually found in sub-urban areas and therefore considered a very good level of retained daylight for an urban area.

- 1.16. Overall, whilst the NSL results in isolation suggest that 7 rooms may experience a minor adverse effect, the overall effect to each room when considering the retained NSL levels and VSC results is not considered to be material.

### **Sunlight**

The sunlight tests show the effects are within the BRE guidelines criteria. The results also show that each room will retain a very good level of sunlight with the proposed development in place. For example, the lowest total retained sunlight result is 52% APSH (Annual Probable Sunlight Hours) which is more than double that recommended by the BRE guidelines (which is 25% APSH). A copy of the APSH results is enclosed.

### **Conclusions**

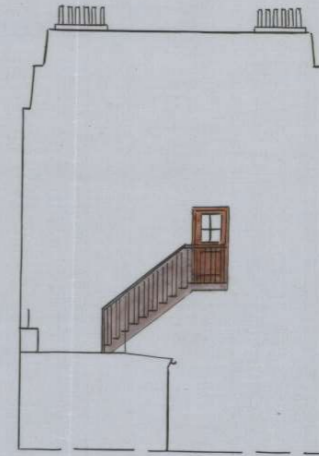
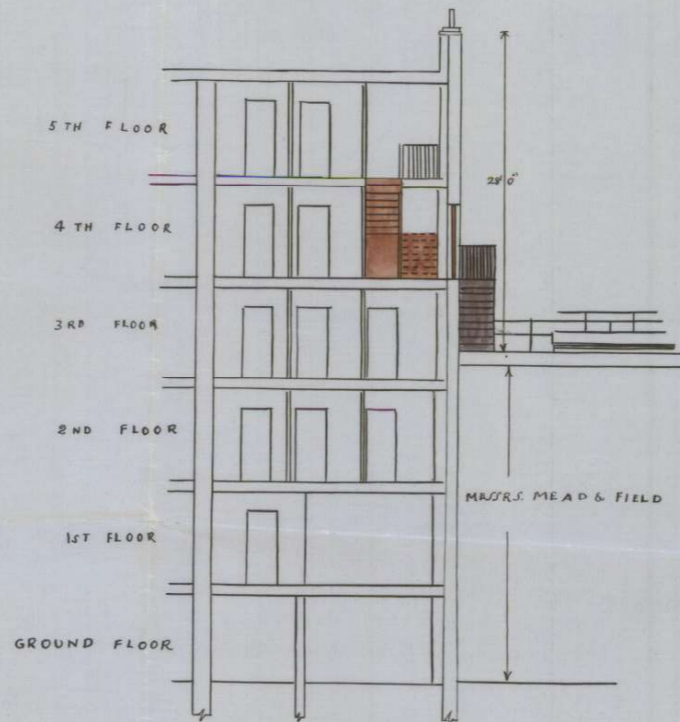
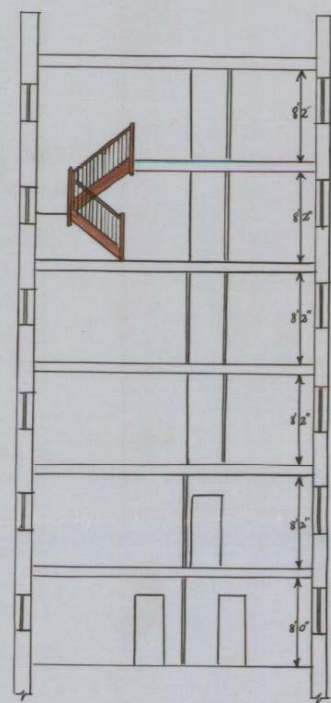
In conclusion and based on the calculations undertaken, we can conclude that the daylight and sunlight amenity impact on The Lodge will be very small and unnoticeable to the occupants.

Yours faithfully



Andrew Cartmell  
**Senior Director**

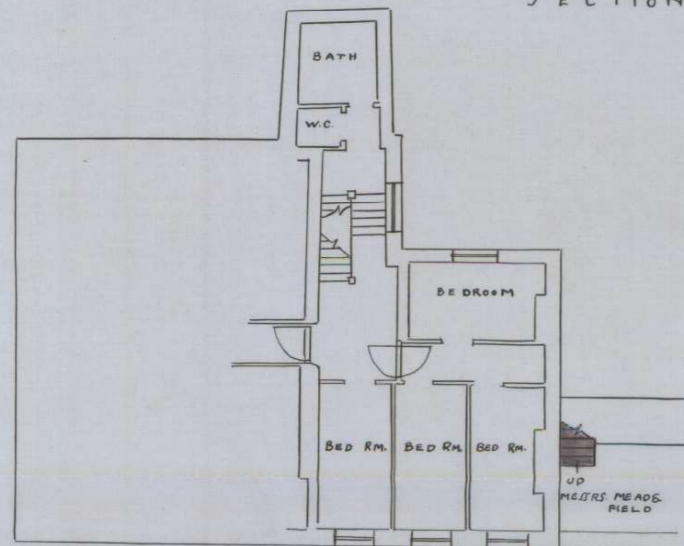
[a.cartmell@point2.co.uk](mailto:a.cartmell@point2.co.uk) 0771 943 6698



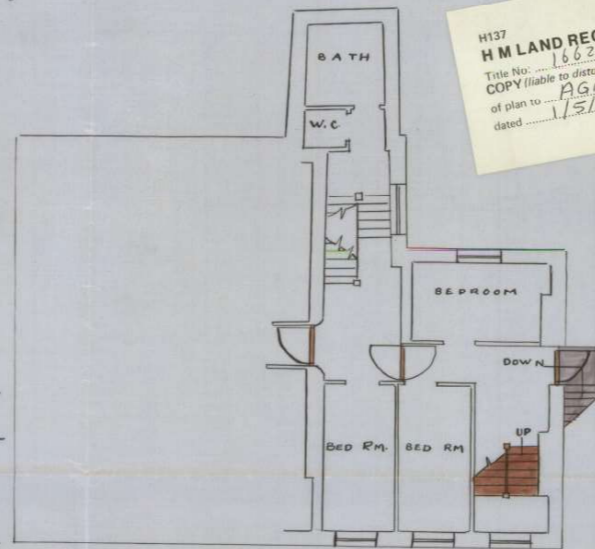
ELEVATION TO MESSRS MEAD & FIELD'S PREMISES

SECTION

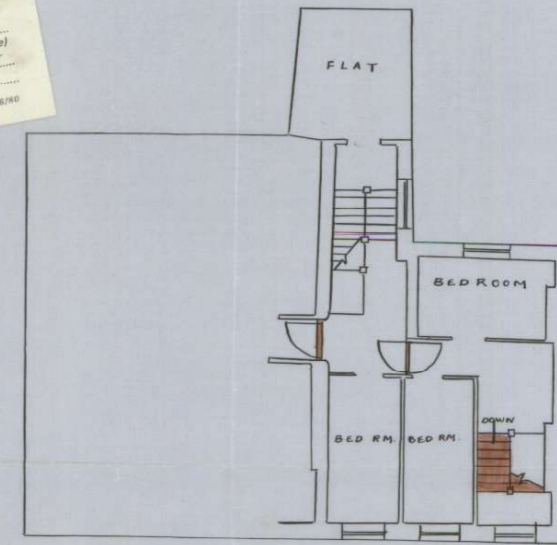
H137  
 H M LAND REGISTRY  
 Title No: 166271  
 COPY (liable to distortion in scale)  
 of plan to AG REEMAST  
 dated 1/5/47 6780



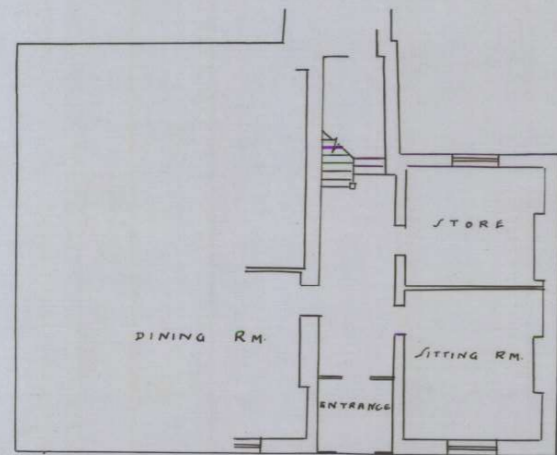
3RD FLOOR



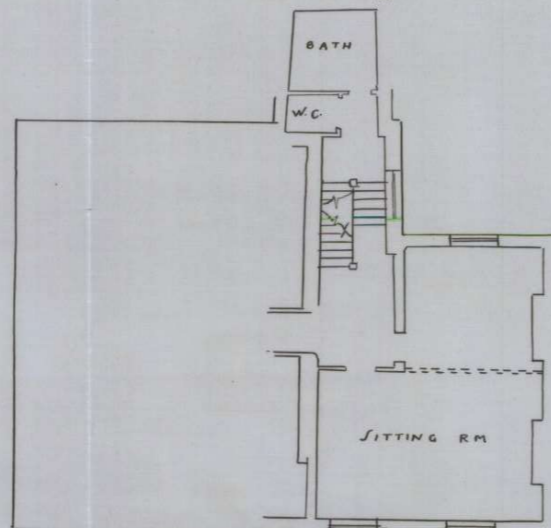
4TH FLOOR



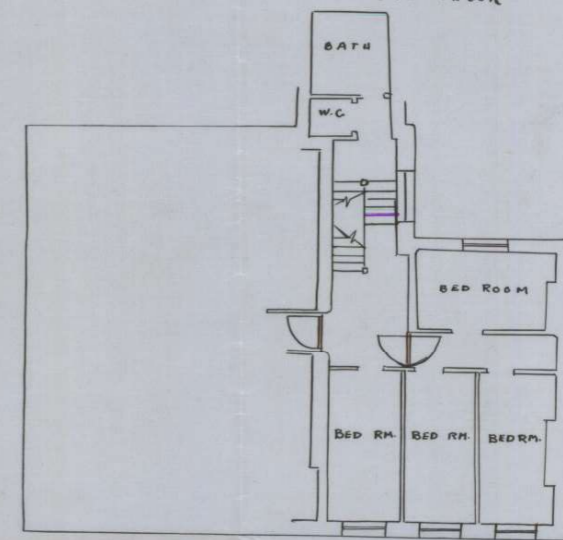
5TH FLOOR



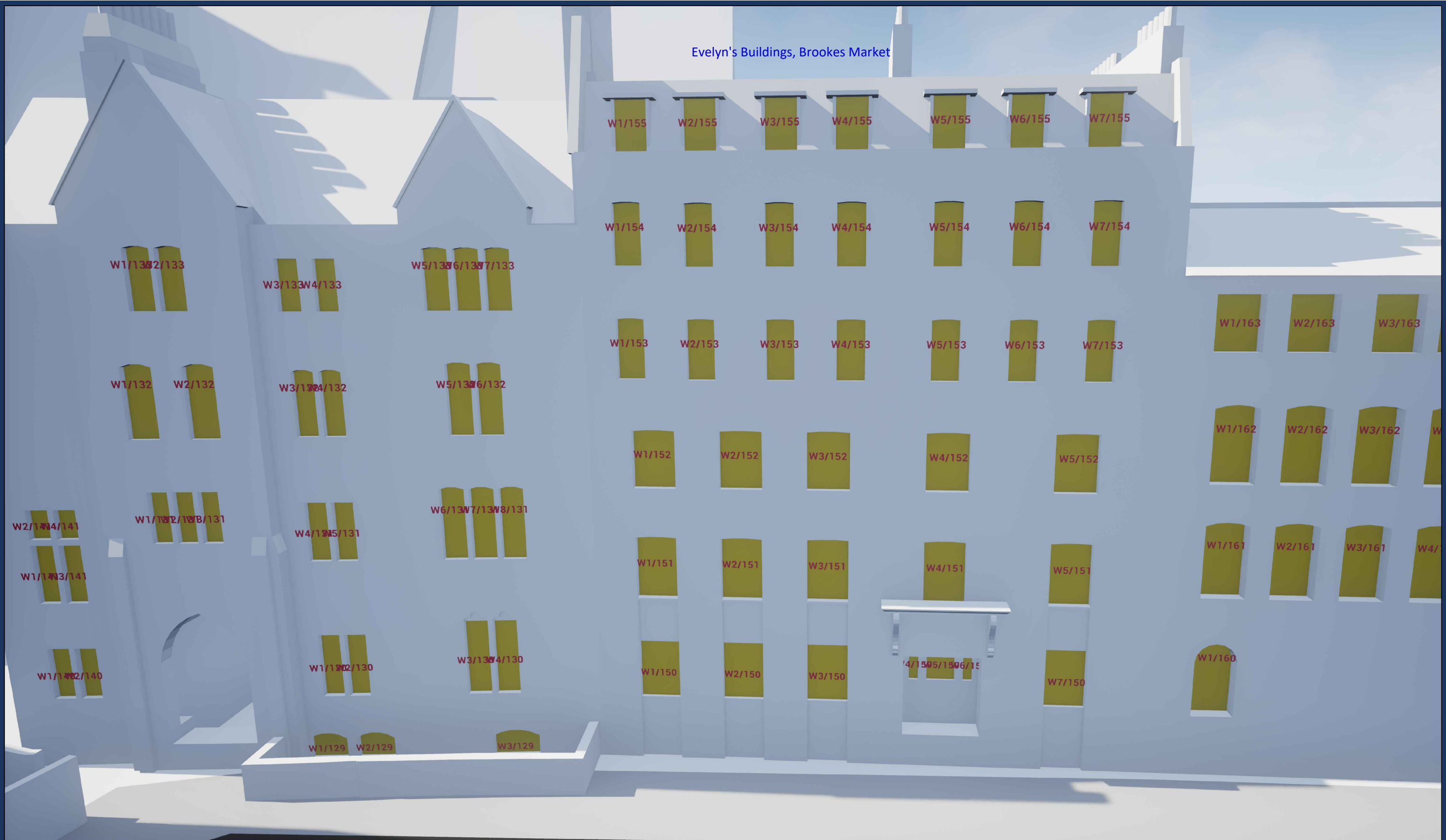
GROUND FLOOR



1ST FLOOR



2ND FLOOR



Sources: Poin2  
 Survey info (received (17-04-2023)  
 Waterhouse Square - ReCAP

Z-mapping Ltd  
 Indicative Site Model

Local Planning Authority  
 Various Surrounding Building Information

Orms Designers & Architects Ltd  
 3D Model Received 23-06-2023 (North)  
 WHS-ORM-2W-ZZ-DR-A-00006-P01-Proposed External Envelope Model  
 Is.dwg  
 3D Model Received 27-01-2023 (South)  
 No3 Waterhouse Square Model.dwg

Key:

Scheme Confirmed:

Date:

Project: Waterhouse Square

Drawn By:  
 MB

Scale:  
 nts @A3

Date:  
 Jun 2023

Title: Window Maps  
 Evelyn's Buildings, Brookes Market

Dwg No:  
**P3154/10/WM**

Rel:  
**9**





# DAYLIGHT Existing VS PROPOSED

2 WATERHOUSE SQUARE, HOLBORN BARS, LONDON  
SCHEME 23/06/2023 AND 27/01/2023

## DAYLIGHT

Room	Room Use	Window	Existing VSC	Proposed VSC	Loss	%Loss
Evelyn's Buildings, Brookes Market						
R1/150	SITTING_ROOM	W7/150	21.52	20.02	1.50	6.97
R3/150	DINNING_ROOM	W1/150	22.09	20.63	1.46	6.61
R3/150	DINNING_ROOM	W2/150	21.93	20.46	1.47	6.70
R3/150	DINNING_ROOM	W3/150	21.62	20.04	1.58	7.31
R1/151	BEDROOM	W1/151	24.35	22.76	1.59	6.53
R2/151	BEDROOM	W2/151	24.20	22.60	1.60	6.61
R3/151	BEDROOM	W3/151	24.17	22.47	1.70	7.03
R4/151	SITTING_ROOM	W4/151	24.06	22.36	1.70	7.07
R4/151	SITTING_ROOM	W5/151	23.97	22.32	1.65	6.88
R1/152	BEDROOM	W1/152	26.72	25.02	1.70	6.36
R2/152	BEDROOM	W2/152	26.56	24.83	1.73	6.51
R3/152	BEDROOM	W3/152	26.50	24.68	1.82	6.87
R4/152	BEDROOM	W4/152	26.37	24.54	1.83	6.94
R5/152	BEDROOM	W5/152	26.24	24.46	1.78	6.78
R1/153	BEDROOM	W1/153	29.03	27.25	1.78	6.13
R1/153	BEDROOM	W2/153	28.91	27.11	1.80	6.23
R2/153	BEDROOM	W3/153	28.80	26.93	1.87	6.49
R3/153	BEDROOM	W4/153	28.72	26.81	1.91	6.65
R4/153	BEDROOM	W5/153	28.60	26.68	1.92	6.71
R5/153	BEDROOM	W6/153	28.51	26.58	1.93	6.77
R5/153	BEDROOM	W7/153	28.36	26.45	1.91	6.73
R1/154	BEDROOM	W1/154	31.02	29.19	1.83	5.90
R1/154	BEDROOM	W2/154	30.89	29.02	1.87	6.05
R2/154	BEDROOM	W3/154	30.79	28.87	1.92	6.24
R3/154	BEDROOM	W4/154	30.74	28.76	1.98	6.44
R4/154	BEDROOM	W5/154	30.66	28.66	2.00	6.52





# DAYLIGHT Existing VS PROPOSED

2 WATERHOUSE SQUARE, HOLBORN BARS, LONDON  
SCHEME 23/06/2023 AND 27/01/2023

## DAYLIGHT

Room	Room Use	Window	Existing VSC	Proposed VSC	Loss	%Loss
R5/154	BEDROOM	W6/154	30.60	28.60	2.00	6.54
R1/155	BEDROOM	W1/155	32.88	31.09	1.79	5.44
R1/155	BEDROOM	W2/155	32.85	30.95	1.90	5.78
R2/155	BEDROOM	W3/155	32.77	30.86	1.91	5.83
R3/155	BEDROOM	W4/155	32.75	30.78	1.97	6.02
R4/155	BEDROOM	W5/155	32.65	30.69	1.96	6.00
R5/155	BEDROOM	W6/155	32.64	30.62	2.02	6.19



# NSL Existing VS PROPOSED

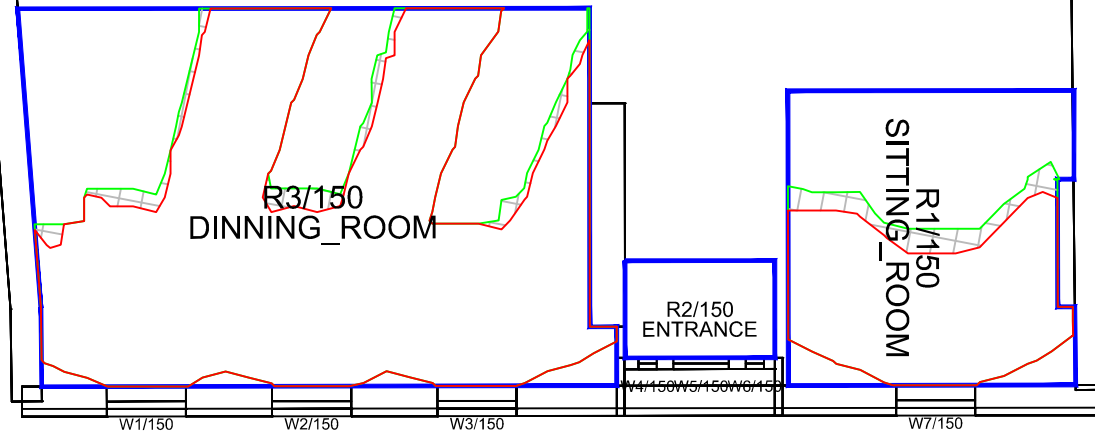
2 WATERHOUSE SQUARE, HOLBORN BARS, LONDON  
SCHEME 23/06/2023 AND 27/01/2023

## NSL

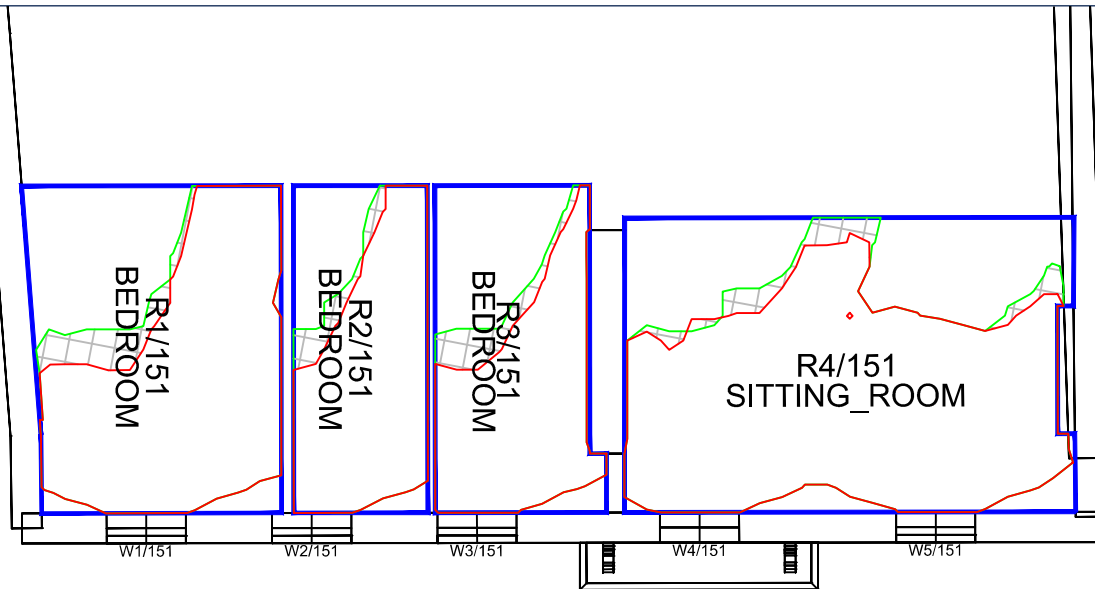
Room	Room Use	Whole Room sq ft	Existing sq ft	Proposed sq ft	Loss sq ft	%Loss
------	----------	------------------	----------------	----------------	------------	-------

### Evelyn's Buildings, Brookes Market

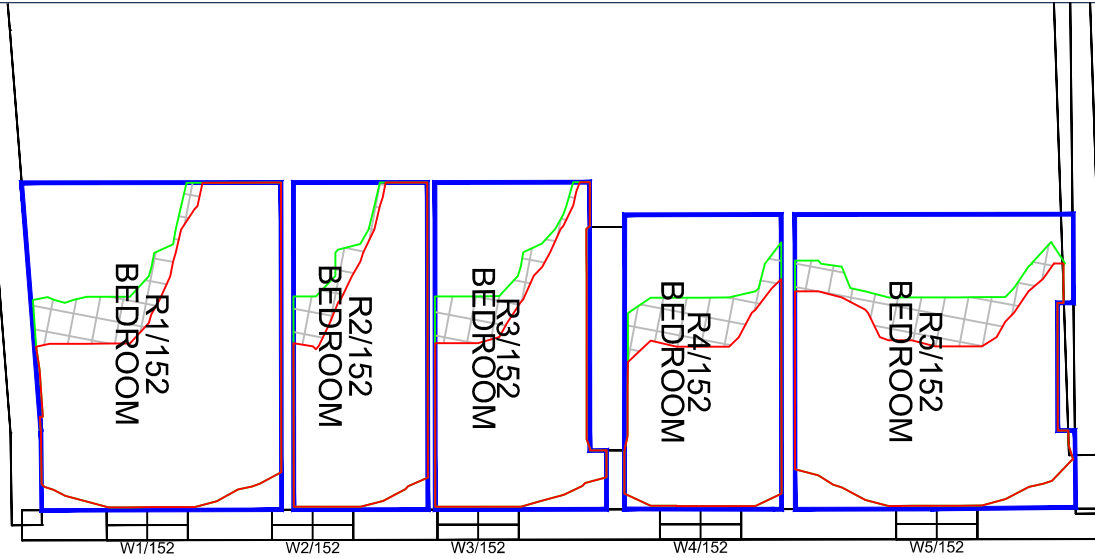
R1/150	SITTING_ROOM	154.7	85.0	74.5	10.5	12.4
R3/150	DINNING_ROOM	399.7	274.9	260.9	14.0	5.1
R1/151	BEDROOM	152.5	107.7	98.1	9.5	8.8
R2/151	BEDROOM	82.5	64.2	59.0	5.1	7.9
R3/151	BEDROOM	97.1	64.1	56.8	7.3	11.4
R4/151	SITTING_ROOM	245.3	170.3	161.3	9.0	5.3
R1/152	BEDROOM	152.5	116.6	103.4	13.2	11.3
R2/152	BEDROOM	82.5	67.2	60.9	6.2	9.2
R3/152	BEDROOM	97.1	69.8	60.4	9.3	13.3
R4/152	BEDROOM	86.9	61.6	49.3	12.3	20.0
R5/152	BEDROOM	150.6	106.1	88.6	17.4	16.4
R1/153	BEDROOM	152.5	131.0	116.8	14.1	10.8
R2/153	BEDROOM	82.5	60.5	45.7	14.9	24.6
R3/153	BEDROOM	97.1	71.0	53.3	17.7	24.9
R4/153	BEDROOM	86.9	70.8	53.6	17.1	24.2
R5/153	BEDROOM	150.6	134.1	117.9	16.1	12.0
R1/154	BEDROOM	152.5	147.5	126.5	21.0	14.2
R2/154	BEDROOM	82.5	77.9	55.6	22.4	28.8
R3/154	BEDROOM	97.1	90.2	64.4	25.8	28.6
R4/154	BEDROOM	86.9	81.3	64.8	16.5	20.3
R5/154	BEDROOM	71.7	69.0	54.9	14.2	20.6
R1/155	BEDROOM	138.7	136.9	130.2	6.7	4.9
R2/155	BEDROOM	74.9	73.4	60.3	13.1	17.8
R3/155	BEDROOM	87.3	83.9	69.9	14.0	16.7
R4/155	BEDROOM	78.0	75.2	70.3	5.0	6.6
R5/155	BEDROOM	64.3	63.2	58.8	4.4	7.0



GROUND FLOOR



FIRST FLOOR



SECOND FLOOR

Sources: Poin2  
Survey info (received (17-04-2023)  
Waterhouse Square - ReCAP

Z-mapping Ltd  
Indicative Site Model

Local Planning Authority  
Various Surrounding Building Information

Orms Designers & Architects Ltd  
3D Model Received 23-06-2023 (North)  
WHS-ORM-2W-ZZ-DR-A-00006-P01-Proposed External Envelope Model  
Is.dwg  
3D Model Received 27-01-2023 (South)  
No3 Waterhouse Square Model.dwg

- Key:
- Existing NSL Contour
  - Proposed NSL Contour
  - Region of Loss / Gain

Project: Waterhouse Square

Title: No Sky-Line Contours  
Evelyn's Buildings, Brookes Market

Scheme Confirmed:

Date:

Drawn By:  
IM

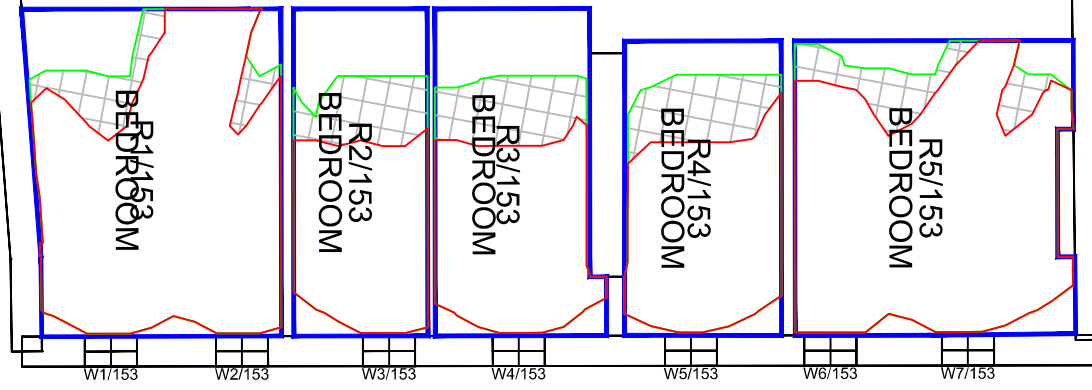
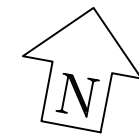
Scale:  
1:100 @A3

Date:  
Jan 2024

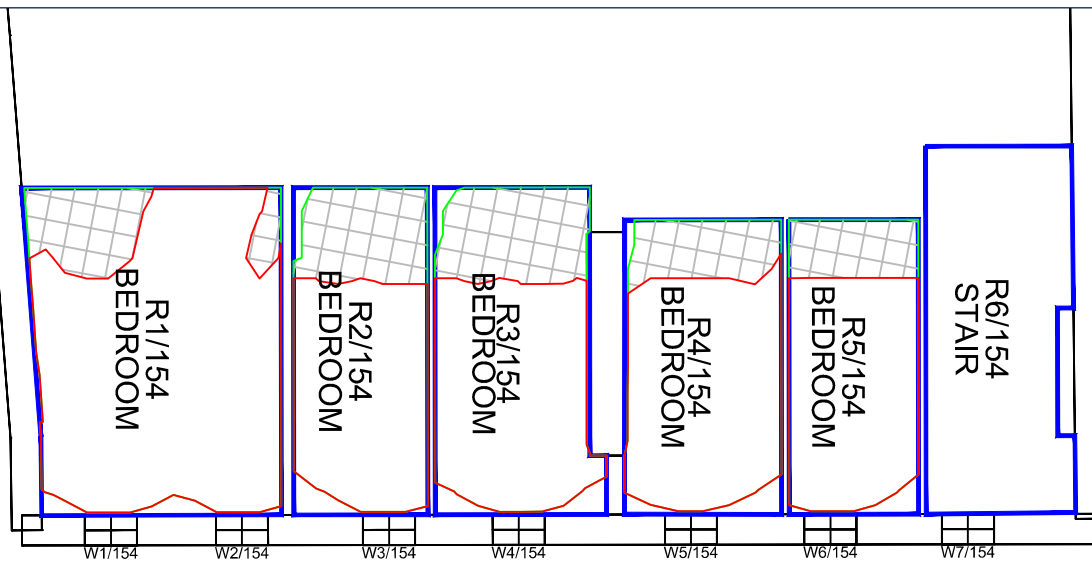
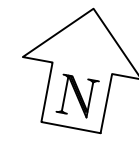
Dwg No:  
**P3154/NSL/14**

Rel:  
**16**

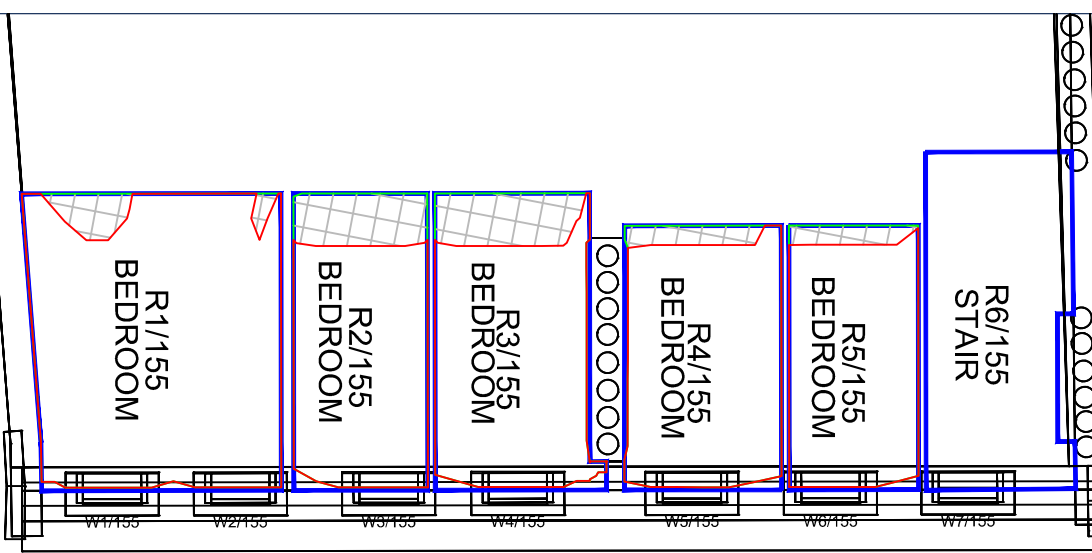
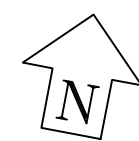




THIRD FLOOR



FOURTH FLOOR



FIFTH FLOOR

Sources: Poin2  
 Survey info (received 17-04-2023)  
 Waterhouse Square - ReCAP

Z-mapping Ltd  
 Indicative Site Model

Local Planning Authority  
 Various Surrounding Building Information

Orms Designers & Architects Ltd  
 3D Model Received 23-06-2023 (North)  
 WHS-ORM-2W-ZZ-DR-A-00006-P01-Proposed External Envelope Model  
 Is.dwg  
 3D Model Received 27-01-2023 (South)  
 No3 Waterhouse Square Model.dwg

Key:

- Existing NSL Contour
- Proposed NSL Contour
- Region of Loss / Gain

Project: Waterhouse Square

Title: No Sky-Line Contours  
 Evelyn's Buildings, Brookes Market

Scheme Confirmed:

Date:

Drawn By:  
 IM

Scale:  
 1:100 @A3

Date:  
 Jan 2024

Dwg No:  
**P3154/NSL/15**

Rel:  
**16**





# SUNLIGHT Existing VS PROPOSED

2 WATERHOUSE SQUARE, HOLBORN BARS, LONDON

SCHEME 23/06/2023 AND 27/01/2023

## APSH

Room	Window	Room Use	Window				Winter %Loss	Annual %Loss	Room				Winter %Loss	Annual %Loss
			Existing		Proposed				Existing		Proposed			
			Winter APSH	Annual APSH	Winter APSH	Annual APSH			Winter APSH	Annual APSH	Winter APSH	Annual APSH		

### Evelyn's Buildings, Brookes Market

R1/150	W7/150	SITTING_ROOM	5	56	2	52	60.0	7.1	5	56	2	52	60.0	7.1
R3/150	W1/150	DINNING_ROOM	6	57	5	55	16.7	3.5						
R3/150	W2/150	DINNING_ROOM	7	60	5	58	28.6	3.3						
R3/150	W3/150	DINNING_ROOM	7	63	4	60	42.9	4.8	9	65	7	63	22.2	3.1
R1/151	W1/151	BEDROOM	10	65	7	61	30.0	6.2	10	65	7	61	30.0	6.2
R2/151	W2/151	BEDROOM	8	65	7	64	12.5	1.5	8	65	7	64	12.5	1.5
R3/151	W3/151	BEDROOM	9	66	8	65	11.1	1.5	9	66	8	65	11.1	1.5
R4/151	W4/151	SITTING_ROOM	8	65	5	62	37.5	4.6						
R4/151	W5/151	SITTING_ROOM	10	67	6	63	40.0	6.0	10	67	6	63	40.0	6.0
R1/152	W1/152	BEDROOM	12	68	9	65	25.0	4.4	12	68	9	65	25.0	4.4
R2/152	W2/152	BEDROOM	12	69	10	67	16.7	2.9	12	69	10	67	16.7	2.9
R3/152	W3/152	BEDROOM	11	68	10	67	9.1	1.5	11	68	10	67	9.1	1.5



# SUNLIGHT Existing VS PROPOSED

2 WATERHOUSE SQUARE, HOLBORN BARS, LONDON

SCHEME 23/06/2023 AND 27/01/2023

## APSH

Room	Window	Room Use	Window				Winter %Loss	Annual %Loss	Room				Winter %Loss	Annual %Loss
			Existing		Proposed				Existing		Proposed			
			Winter APSH	Annual APSH	Winter APSH	Annual APSH			Winter APSH	Annual APSH	Winter APSH	Annual APSH		
R4/152	W4/152	BEDROOM	13	70	10	67	23.1	4.3	13	70	10	67	23.1	4.3
R5/152	W5/152	BEDROOM	14	72	9	67	35.7	6.9	14	72	9	67	35.7	6.9
R1/153	W1/153	BEDROOM	16	73	13	70	18.8	4.1						
R1/153	W2/153	BEDROOM	17	74	14	71	17.6	4.1	17	74	14	71	17.6	4.1
R2/153	W3/153	BEDROOM	16	73	14	71	12.5	2.7	16	73	14	71	12.5	2.7
R3/153	W4/153	BEDROOM	17	73	15	71	11.8	2.7	17	73	15	71	11.8	2.7
R4/153	W5/153	BEDROOM	16	71	15	70	6.3	1.4	16	71	15	70	6.3	1.4
R5/153	W6/153	BEDROOM	16	72	15	71	6.3	1.4						
R5/153	W7/153	BEDROOM	16	72	13	69	18.8	4.2	17	73	15	71	11.8	2.7
R1/154	W1/154	BEDROOM	20	77	17	74	15.0	3.9						
R1/154	W2/154	BEDROOM	21	78	16	73	23.8	6.4	21	78	17	74	19.0	5.1
R2/154	W3/154	BEDROOM	22	80	16	74	27.3	7.5	22	80	16	74	27.3	7.5
R3/154	W4/154	BEDROOM	22	80	18	76	18.2	5.0	22	80	18	76	18.2	5.0



# SUNLIGHT Existing VS PROPOSED

2 WATERHOUSE SQUARE, HOLBORN BARS, LONDON

SCHEME 23/06/2023 AND 27/01/2023

## APSH

Room	Window	Room Use	Window				Winter %Loss	Annual %Loss	Room				Winter %Loss	Annual %Loss
			Existing		Proposed				Existing		Proposed			
			Winter APSH	Annual APSH	Winter APSH	Annual APSH			Winter APSH	Annual APSH	Winter APSH	Annual APSH		
R4/154	W5/154	BEDROOM	22	80	18	76	18.2	5.0	22	80	18	76	18.2	5.0
R5/154	W6/154	BEDROOM	22	80	18	76	18.2	5.0	22	80	18	76	18.2	5.0
R1/155	W1/155	BEDROOM	24	81	19	76	20.8	6.2						
R1/155	W2/155	BEDROOM	24	82	21	79	12.5	3.7	25	83	21	79	16.0	4.8
R2/155	W3/155	BEDROOM	25	83	22	80	12.0	3.6	25	83	22	80	12.0	3.6
R3/155	W4/155	BEDROOM	25	83	21	79	16.0	4.8	25	83	21	79	16.0	4.8
R4/155	W5/155	BEDROOM	24	82	20	78	16.7	4.9	24	82	20	78	16.7	4.9
R5/155	W6/155	BEDROOM	24	82	18	76	25.0	7.3	24	82	18	76	25.0	7.3