



(Sent by email & post)

15th May, 2013

Dear Mr Weatherhead,

Re: University of London Proposed Redevelopment of Garden Halls and Impact on Daylight and Sunlight Properties in Sandwich House, Sandwich Street

I would confirm that Anstey Horne were instructed by The Tenants Association for Sandwich House, Sinclair House and Thanet House to review the Daylight Sunlight and Overshadowing of report produced by GIA dated March 2013 in connection with the above.

As well as reviewing the relevant sections in the GIA report, I have also reviewed various TP Bennett drawings of the proposed development on Camden's planning website for the planning application 2013/1598/T.

GIA have undertaken sunlight and daylight testing in accordance with the recommendations of the BRE document "Site layout, planning for daylight and sunlight: A guide to good practice" Second Edition 2011 ("BRE Guide"). I have no comments on GIA's application of the BRE Guide.

Although Anstey Horne have not been instructed to undertake any checking of the technical work from which GIA's results have been generated, general visual checks of the assessment model illustrated in their report and spot checks of heights on their model against TP Bennett's drawings leads me to conclude that the overall level of accuracy of their modelling work is satisfactory. GIA have not inspected any of the rooms within the areas of Sandwich House and Thanet House they have tested, but have assumed a 14' room depth. The room layouts only effect the daylight distribution ("DD") results (please note that GIA also refer to this test as no skyline or NSL). Room layouts have no effect on vertical sky component (VSC) or annual problem sunlight hours (APSH) results, which are both taken at the window of the neighbouring property and which GIA have modelled from survey. I discuss the effect of the room layouts on the DD results in more detail below.

GIA's results for the two BRE daylight tests (VSC and DD) are consistent with what I would have expected to see given the significant additional massing the proposed development will impose on the currently vacant car park site towards the north end of Sandwich Street.

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There are no issues in Thanet House and the southernmost block of Sandwich House (76-93 Sandwich Street) which is situated opposite a substantial existing block on the University of London's site. The GIA results for the north block of Sandwich House (1-27 Sandwich Street) confirms almost all daylight results would meet the targets in the BRE Guide, but with two rooms with VSC and DD transgressions adjacent to 28-51 Sandwich Street at ground and first floor respectively.

As would be expected, the VSC and DD results which do not meet the targets in the BRE Guide are concentrated in 28-51 and 52-75 Sandwich Street, which will be most directly affected by the proposed building on the existing car park. VSC transgressions are limited to ground and first floor level and none of the windows tested would fall below 0.75 of their existing VSC value (compared to the BRE target of 0.8). However the DD results show far more extensive and serious reductions in existing values.

The BRE Guide says that diffuse daylighting to an existing building may be adversely affected if either the VSC is less than 27% and less than 0.8 times its former value or the area of the working plane in a room which can receive direct skylight is reduced to less than 0.8 times its former value (DD/NSL). The DD results show rooms falling below the recommendations of the BRE Guide from ground to second floor level to the block at 28-51 Sandwich Street and from ground to third floor level to the block at 52-75 Sandwich Street.

The commentary in GIA's report refers to eight rooms in 28-51 Sandwich Street and three in 52-75 Sandwich Street being more sensitive/susceptible to alterations in new massing on the car park, as these rooms would have both VSC and DD results that fall below the BRE criteria. This, however underestimates the impact the proposed development would have on properties on the opposite side of Sandwich Street as the BRE Guide says that diffuse daylighting may be adversely affected if either the VSC or the DD criteria are not met.

GIA's testing confirms thirty-eight rooms would not meet the DD criteria, including the eleven rooms highlighted by GIA which would not meet the VSC criteria either. Of the thirty-eight rooms, eleven would be left with between 0.7-0.79 times the former day lit area (compared to the BRE target of 0.8), ten would be left between 0.6 and 0.69, seven between 0.5 and 0.59, eight between 0.4 and 0.49 and two rooms (both at ground floor level to 52-75 directly opposite the car park) would be left with only 0.37 times their current day lit area.

Given the levels of these losses and the number of affected rooms, we do not agree with GIA's assessment that the impact of the proposed development on daylight to 28-51 Sandwich Street would be moderate and the impact on daylight to 52-75 Sandwich Street would be minor.

In generating their DD results, GIA have not inspected any of the properties in Sandwich Street internally, but state that they have based their assessment on a 14' room depth. I have inspected 53 and 71 Sandwich Street and can confirm that the main habitable rooms are 14' deep, although kitchens in the two flats are inspected were shallower. So some of the daylight distribution transgressions which GIA have reported would be less severe than predicted where they occur in shallower rooms, but at least half if not more the thirty-eight results which do not meet the recommendations of the BRE Guide accurately predict the impact of the proposed development as they are based on the correct room depth.

GIA quite rightly emphasised the fact that the BRE Guide itself states that its targets should be interpreted flexibly and cite the facts that daylight levels in the flats situated opposite the car park would not be dissimilar in the proposed conditions than those currently experienced by properties further south on Sandwich Street. That may be true, but that does not alter the fact that there will be a significant change in the daylight conditions to a large number of flats on Sandwich Street and consequent loss of amenity.

For sunlight, GIA report far few transgressions of the BRE Guidance. That is not to say that windows overlooking the site will not experience noticeable changes in the levels of sunlight that they currently receive across the course of the year, but the majority would still retain the suggested 25% total APSH with 5% available during the winter months as set out in the BRE Guide. Only a handful of windows would drop below these targets and retain less than 0.8 times their former value in either period.

I hope the above is of assistance.

