DAYLIGHT & SUNLIGHT - INDEPENDENT REVIEW

relating to the proposed redevelopment at

GREAT ORMOND STREET HOSPITAL – CHILDRENS CANCER CENTRE (GOSHCCC) LONDON WC1

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1.0 EXECUTIVE SUMMARY

1.1 This report represents an independent review on the Daylight and Sunlight assessment report prepared by Avison Young (AY) dated 20th May 2022 (ref. S2 P01) and subsequent 2 No. statements both dated 14th October 2022, relating to the planning application 2022/2255/P which considers the development proposal at Great Ormond Street Hospital – Children Cancer Centre (GOSHCCC). We summarise our key comments as;

1.2 We have no significant adverse comments on the methodology utilised by Avison Young (AY) although to highlight, AY have also submitted review of the Average Daylight Factor (ADF) as 'supplementary analysis'; we consider review of ADF (which is now obsolete in reference to the latest BRE Guide 2022 / 3rd edition) has limited weight and thus we have not considered in detail but do provide summary comments only relating to ADF within paras. 3.139 & 3.140.

1.3 To highlight, the new BRE Guide (Site Layout Planning for Daylight and Sunlight – a Guide to Good Practice) has been revised with the 3rd edition released on 8th June 2022; there is no significant difference to the methodology utilised for review of the impact upon daylight and sunlight to neighbouring properties in consideration of this site and context. Whilst the AY submission is based upon the former 2011 edition (which is now withdrawn), which was the relevant edition at the time of the analysis and preparation of the AY report, if such analysis and findings where to be updated to the new BRE Guide 2022 edition, there would be effectively no change to the analysis submitted relating to the impact upon neighbouring properties. AY have also effectively confirmed the same within one of their subsequent statements dated 14th October 2022.

1.4 We consider the extent of neighbouring properties reviewed is appropriate. The immediate context of the surrounding neighbouring properties is primarily residential, plus of course, the medical and supporting facilities formed by the various existing GOSH buildings.

1.5 In terms of the impact of the proposal upon existing neighbouring properties, losses in daylight and sunlight have been considered. For daylight, this has been considered in reference to both the standard vertical sky component (VSC) and daylight distribution i.e. no sky line / NSL (where room layouts are known) as per the BRE Guide.

1.6 In consideration of the daylight analysis for all neighbouring properties for both VSC and NSL, we summarise the following;

1.7 It is apparent that for neighbouring residential property Nos. 27, 29, 31-33-35, 37-39, 41, 45, & 47 and to a slightly lesser extent for 49 Great Ormond Street, there are reductions in both daylight VSC and daylight distribution which can be considered 'major adverse', noticeable and would typically leave rooms gloomy with a greater reliance upon artificial lighting. Included in part of this adversity are circa 40 No. living room / studios (primarily rooms). If assessment were to be considered in reference to an 'Environmental Impact Assessment' (EIA), we would conclude overall 'major adverse impact' for these properties. Especially, for living / studios rooms, reductions (and indeed retained levels) are challenging to consider as 'acceptable'.

1.8 For any impacts to neighbouring residential at Spens House at Lamb's Conduit Street; 63 Lamb's Conduit Street and Nos. 19, 21, 55, 57, 59 & 61 Great Ormond Street, such reductions meet BRE Guide default target criteria and should be considered acceptable. In addition, for 51 Great Ormond Street, reductions are typically meeting BRE Guide default target criteria.

1.9 For the remainder of properties reviewed relating to Nos. 23, 25 Great Ormond Street and 29 and 30 Orde Hall Street, reductions generally do not meet BRE Guide default target typically for daylight VSC (and for No. 25 Great Ormond Street, also for daylight distribution). In terms of adversity, these could be considered to range more 'minor' or 'moderate' impact adversity in reference to EIA (worst affected, towards the upper end).

1.10 Given the aforementioned, even in consideration of such factors as an inner London urban context site, the significant clear benefits that a 'world-class' medical additional facility would bring, it will still be difficult for committee members to potentially consider the *'benefits outweigh the harm'*. In recognition of the importance of this proposal, the question arises as to whether there is an alternative design that can deliver such facilities but to mitigate some of the significant adverse impacts upon daylight to a significant number of neighbouring residential / dwelling properties by way of a refined / reduced massing; we understand that for the facilities to be provided, there is not really scope for such amendment.

1.11 For sunlight reductions, we conclude that impacts to sunlight to neighbouring properties meets BRE Guide default target criteria, but this is due to limited applicable sunlight review given that the orientation of the neighbouring windows opposite the proposal are typically 'north-facing', thus not appropriate for review given such orientation.

1.12 Finally, in terms of the provision of daylight and sunlight within the proposed development, this has not been reviewed. Ordinarily, hospitals could be considered to have a reasonable expectation of daylight and sunlight pending particular rooms uses / facilities. The applicant may wish to submit a statement relating to this.

2.0 INTRODUCTION TO REVIEW APPROACH

2.1 In reference to Camden's Planning Guidance (Amenity) and also (Design) 2021, the application is accompanied by a Daylight and Sunlight prepared by the applicant's consultant, Avison Young (AY). This provides an assessment of the potential impact of the development on daylight, sunlight and overshadowing to neighbouring residential properties based on the approach set out in the Building Research Establishment's (BRE) 'Site Layout Planning for Daylight and Sunlight: A Good Practice Guide'.

2.2 To highlight, the new BRE Guide (Site Layout Planning for Daylight and Sunlight – a Guide to Good Practice) has been revised with the 3rd edition released on 8th June 2022; there is no significant difference to the methodology utilised for review of the impact upon daylight and sunlight to neighbouring properties in consideration of this site and context. Whilst the Avison Young (AY) submission is based upon the former 2011 edition (which is now withdrawn), which was the relevant edition at the time of the analysis and preparation of the AY report, if such analysis and findings where to be updated to the new BRE Guide 2022 edition, there would be effectively no change to the analysis submitted relating to the impact upon neighbouring properties.

2.3 The BRE guidelines are not mandatory; they do however act as a guide to help understand the impact of a development upon neighbouring properties, while acknowledging that in some circumstances, such as that of a dense inner London urban environment, some impact may be unavoidable.

2.4 In accordance with the BRE Guide, as background, alternative target values can be set to those presented within the main body of the BRE Guide; such alternative target values may be more appropriate for a particular site context / a more appropriate bench line applicable. Such alternative target approaches are referenced within Appendix F of the BRE Guide and often sought for agreement with the local authority prior to submission if being utilised.

2.5 More commonly, the standard BRE Guide default target criteria is utilised but with appropriate judgement made in respect of departures to that target criteria; the BRE Guide supports a suitable and flexible approach is made for applicable site development and context.

2.6 This independent review is based upon consideration of the report and supporting analysis provided as part of the planning application with consideration in the first instance to the standard BRE Guide target criteria. As background, we have relied upon the analysis submitted by AY and have not undertaken any analysis review to verify although flagged any applicable queries on analysis if considered appropriate.

3.0 NEIGHBOURING PROPERTIES – IMPACT TO DAYLIGHT & SUNLIGHT

BACKGROUND TO ANALYSIS

3.1 The impact of the proposal upon loss of daylight to neighbouring properties is primarily considered in reference to vertical sky component (VSC) and daylight distribution (usually abbreviated to NSL / no sky line as this represents the point / the contour within the room which divides the room area into able and not able to receive direct skylight measured at the working plane, where room layouts are known, as per the BRE Guide). Given the significant importance of the scheme proposal and context, sole consideration to reductions in daylight (or sunlight) to neighbouring properties would not consider the broader consideration of overall impact examination towards 'acceptability' of the scheme in terms of impacts upon daylight and sunlight to neighbouring properties. Accordingly, we have considered it is appropriate that some consideration is also given to retained values of daylight (and sunlight as applicable) in the proposed scenario i.e. retained values with the proposed development insitu.

3.2 For background on daylight and sunlight analysis review, we provide the following definitions;

Daylight VSC : The Guide considers that in terms of vertical sky component (VSC), as a target value, if the VSC with the new development in place is both, less than 27% and less than 0.8 times its former value, occupants of the existing building will notice the reduction in the amount of skylight. The maximum VSC value obtainable at a flat window in a vertical wall is effectively 40%.

VSC represents a ratio of the part of illuminance at a point on a given vertical plane (usually the centre point of window on the window wall face), that would be received directly from an overcast sky (CIE standard overcast sky) to illuminance on a horizontal plane due to an unobstructed hemisphere of this sky. The VSC does not include reflected light, either from the ground or from other buildings.

Daylight Distribution : The Guide considers that in terms of daylight distribution, as a target value, if the daylight distribution with the new development in place is less than 0.8 times its former value, occupants of the existing building will notice the reduction in the amount of daylight distribution within the room.

3.3 The review has focused upon the conventional BRE Guide analysis of VSC and daylight distribution review. However, given that there are some properties with analysis results not meeting BRE Guide target criteria, the extent of 'adverse impact'

has also been categorised on the basis of Environmental Impact Assessment (EIA) consideration for reductions that exceed 20% / not meeting BRE Guide target criteria (i.e. adverse / noticeable effect). Consideration on some aspects of seeking to classify adversity is presented within Appendix H of the BRE Guide (2022). However, it is common for the industry to consider initial adversity in reference to the numerical loss only, broadly as follows; (albeit applicable subsequent interpretation on such initial numeric categorisation is usually then needed overall for appropriate judgement based upon EIA review of the greater definition within Appendix H of the BRE Guide)

Minor Adverse: Reductions in VSC or NSL of >20% to 30%;
Moderate Adverse: Reductions in VSC or NSL of >30% to 40; and
Major Adverse: Reductions in VSC or NSL of greater than 40%.

3.4 In terms of sunlight, losses are reviewed in respect of neighbouring habitable rooms with main emphasis upon living rooms (and conservatories if applicable). The BRE recommendation is that windows facing within 90° of South should have 25% of annual probable sunlight hours with 5% in the winter months (the latter from the autumn equinox to the spring equinox). Where reductions below the recommended levels are contemplated, these should be targeted so that the proposed value is 0.8 times former value or above (unless a reduction of sunlight received over the whole year is not greater than 4% of annual probable sunlight hours).

3.5 In addition, losses in sunlight to amenity area is also considered. The BRE Guide states that the garden (amenity space) of an existing property, it is recommended that for it to appear adequately sunlit throughout the year;

1) *at least half of a garden or amenity area should receive at least two hours of sunlight on 21st March.*
2) *If as a result of a new development an existing garden or amenity area does not meet the above, and the area which can receive two hours of sun on 21st March is less than 0.8 times its former value, then the loss of sunlight is likely to be noticeable. If a detailed calculation cannot be carried out, it is recommended that the centre of the area should receive at least two hours of sunlight on 21st March.*

3.6 There are many other considerations and analysis reviews in reference to the BRE Guide and with due consideration to other industry relevant guidelines, standards, planning appeal decisions etc which we will refer to if particularly applicable to do so.

Special Note:

3.7 It is recognised that the AY report has gone into some detail on the various policy and guidance context. For the sake of avoiding repetition, we concur with the references stated as within section 4. 'Policy and Guidance Context' within the AY report, excepting of course that the new BRE Guide has subsequently been revised (3rd edition / 2022). Extending the latter comment further, we consider review of ADF (which is now obsolete in reference to the latest BRE Guide 2022 / 3rd) has limited weight and thus we have not considered in detail but do provide summary comments only relating to ADF within paras. 3.139 & 3.140.

3.8 In consideration of policy and guidance, we obviously recognise the important of the facilities that this application proposal would provide although ultimately, whether the scheme is granted consented is vested with the planning committee or planning inspectorate, if at appeal.

NEIGHBOURING PROPERTIES FOR REVIEW

3.9 In terms of properties applicable for analysis these are summarised as;

Broadly north-east of site:
Spens House, Lamb's Conduit Street

Broadly south / south-east of site:
63 Lamb's Conduit Street
Nos. 19, 21, 23, 25 Great Ormond Street
30 Orde Hall Street

Broadly south / south-west of site:
29 Orde Hall Street
Nos. 27, 29, 31-35, 37-39, 41, 45, 47, 49, 51, 53, 55, 57, 59 & 61 Great Ormond Street

3.10 As background, No. 43 Great Ormond Street appears not to contain residential based upon initial Valuation Office Agency (VOA) council tax records and unless there is a particular need for natural light to this property (commercial properties ordinarily relying on artificial lighting), then we concur that this property need not be analysed.

3.11 We concur with the extent of neighbouring properties analysed.

NEIGHBOURING DAYLIGHT ANALYSIS REVIEW

3.12 In terms of daylight analysis, applicable reductions to habitable rooms for both VSC and NSL meets BRE Guide default target criteria for the following properties and therefore, not commented upon further in this review of daylight;

- Spens House, Lamb's Conduit Street
- 63 Lamb's Conduit Street
- Nos. 19, 21, 55, 57, 59 & 61 Great Ormond Street

3.13 As background, No. 21 Great Ormond Street is included within the category as whilst reductions for 2 No. isolated windows have reductions just slightly greater than a 20% reduction, the average VSC for the room would be applicable and, on that basis, such a reduction would then meet BRE Guide default target criteria.

3.14 In terms of the remaining properties, we now comment upon those neighbouring properties that would experience some reductions not meeting BRE Guide default target criteria for daylight;

GREAT ORMOND STREET

3.15 Nos. 23, 25 & 27 Great Ormond Street (No. 25 being a GOSH Charity property):

3.16 **Background:** These three properties are similar and room uses / layouts have generally been based upon a set of floor plans dated 1982 from the planning portal for No. 23, plans for No. 25 from GOSH (as a GOSH Charity property) and for No. 27 a set of floor plans dated 1990 from the planning portal.

3.17 From initial review of VOA council tax records, residential is indicated as follows;
No. 23 – 3 No. flats (at 1st, 2nd & 3rd floor).
No. 25 – 2 No. flats (at ground & 1st floor) plus 1 No. maisonette (arranged over 2nd & 3rd floor)
No. 27 – 4 No. flats (at ground, 1st, 2nd & 3rd floor).

3.18 For analysis, AY have also considered at ground floor flat at No. 23. It is not known whether there are dwellings / habitable rooms at basement level at No. 25 & 27 Great Ormond Street; should this be the case, AY has already undertaken analysis.

3.19 Typically, each flat has at least one habitable single-aspect room served by window(s) facing onto Great Ormond Street / facing the proposal. However, in most instances, the dwelling flat also has at least one further habitable room served by a window in the rear elevation which will not be affected by the proposed development.

3.20 Habitable rooms served by windows in the front elevation affected by the proposed scheme are predominantly living / studio rooms which in some instances have a separate kitchen room. The studio room could be considered as the room that an occupant is anticipated to spend most time serving a multi-living purpose (primary room).

3.21 **Daylight VSC:** In terms of impacts from the proposal upon daylight VSC to windows serving anticipated habitable rooms (including the addition of basement consideration to Nos. 25 & 27 Great Ormond Street), this is summarised in **Table 1.1** – Daylight VSC review Summary for Windows within the front elevation serving habitable rooms (average VSCs considered);

Table 1.1 – Daylight VSC review Summary for Windows within the front elevation serving habitable rooms (average VSCs considered)

Floor	Property No.	Window ref.	Existing VSC	Proposed VSC	% reduction
Basement	23	n/a			
Basement	25	W1&2 /40	16.6	10.8	35.3% - error?
Basement	27	W1&2 /50	4.5	4.3	Meets at 4.0%
Ground	23	W3&4 /30	19.4	13.7	29.3%
Ground	25	W2&3 /41	20.3	12.8	36.7%
Ground	27	W1&2 /51	20.7	12.0	42.4%
1st floor	23	W4,5,6&8 /31	20.3	16.0	21.5%
1st floor	25	W1,2&3 /42	23.1	15.2	34.2%
1st floor	27	W1,2&3 /52	23.7	13.7	42.0%
2nd floor	23	W4,5&6 /32	24.8	18.6	24.9%
2nd floor	25	W1,2&3 /43	25.4	17.7	30.6%
2nd floor	27	W1,2&3 /53	26.7	15.9	40.3%
3rd floor	23	W4,5&6 /33	27.2	20.8	23.6%
3rd floor	25	W1&2/ 44	28.4	19.8	30.4%
3rd floor	27	W1&2 /54	29.1	17.9	38.4%

3.22 From **Table 1.1** it can be concluded that for Nos. 23, 25 & 27 Great Ormond Street, with the exception of the front basement windows to No. 27, all reductions do not meet BRE Guide default target criteria / would be noticeable. Reductions in daylight VSC are 'minor adverse' to the windows at No. 23 Great Ormond Street, 'moderate adverse' to No. 25 Great Ormond Street and typically 'major adverse' to No. 27 Great Ormond Street. Thus, a worsening is evident / greater impact as we move from No. 23, then No. 25 and No.27 as travelling towards being more opposite the continuous broadly uniform proposal in terms of massing obstruction (Nos. 31-33-35 Great Ormond Street being broadly centrally opposite the proposal).

3.23 In terms of windows at basement level, given their context, daylight VSC is already significantly restricted by being opposite and in close proximity to the lightwell retaining wall to the pavement/road. In terms of VSC analysis for the basement at No. 25, this may be a potential analysis error as the presented VSC values appear too high (the

VSC values presented for the basement to neighbouring No. 27 being more the anticipated although noted the basement windows to No. 25 are positioned respectively slightly higher).

3.24 If a retained VSC level of 'mid-teens' is seen as a possible informal alternative target, in terms of retained VSC values, the majority would have levels above except typically retained levels at ground floor and basement levels.

3.25 Retained VSC values at ground floor are circa 13 (average ranging 12.0 to 13.7). Basement levels are significantly lower to No. 27 Great Ormond Street for existing and proposed scenario for the aforementioned reasons (as also stated, there may be a potential error in the analysis for VSC at basement level to neighbouring No. 25).

3.26 **Daylight Distribution:** For any applicable reductions to daylight distribution to habitable rooms within No. 23 Great Ormond Street, these meet BRE Guide default target criteria with the isolated exception of the ground floor front studio room with a reduction of 33.4% ('moderate adverse') reduction which would be noticeable.

3.27 For Nos. 25 & 27 Great Ormond Street, for rooms anticipated to be living / studios rooms, all of these do not meet BRE Guide default target criteria and these are summarised in **Table 1.2** – Daylight Distribution review Summary for living / studio rooms having reductions not meeting BRE - Nos 25 & 27 Great Ormond Street only.

Table 1.2 – Daylight Distribution review Summary for living / studio rooms having reductions not meeting BRE - **Nos 25 & 27 Great Ormond Street only**

Floor	Room refs.	Existing (%) NSL range	Proposed (%) NSL range	% reduction range
Anticipated living room / studio				
Basement	R1/40, R1/50	44.3 to 44.5	23.3 to 24.4	44.9% to 47.6%
Ground	R2/41, R1/51	63.5 to 65.8	37.9 to 39.8	37.3% to 42.4%
1st floor	R1/42, R/52	90.0 to 98.4	56.4 to 60.6	32.7% to 42.7%
2nd floor	R1/43, R5/53	94.7 to 97.9	51.9 to 64.7	31.6% to 47.0%
3rd floor	R1/54	76.6	29.6	61.4%

3.28 From **Table 1.2**, it can be seen that for 9 No. anticipated living / studio rooms, reductions in daylight distribution do not meet BRE Guide default target criteria / would be noticeable. Reductions could be considered 'major adverse' to 6 No. rooms and 'moderate adverse' to 3 No. rooms.

3.29 Retained levels of daylight distribution would be particularly low to 2 No. living / studio rooms at basement (circa 24% daylight distribution) and to a slight lesser extent to 2 No. living / studio rooms at ground floor (circa 38% daylight distribution). In addition, the retained daylight distribution level to the living / studio room at 3rd floor to No. 27 Great Ormond Street, is also particularly low at 29.6% daylight distribution (although this room has some degree of inherent sensitivity as served by one relatively small window; the other front window anticipated to be serving a kitchen area).

3.30 For the remaining 4 No. living / studio rooms, retained levels of daylight distribution would be greater than half the room area although reductions to existing values would still be noticeable.

3.31 In consideration of daylight distribution for other habitable room uses served by windows within the front elevation, there is one anticipated bedroom to No. 25 Great Ormond Street (room ref. R1/44 – 3rd floor) for which reductions meets BRE Guide default target criteria. There are also 2 No. kitchen areas / rooms analysed (at 2nd and 3rd floors) to No. 23 Great Ormond Street which have reductions meeting BRE Guide default target. Conversely, at 27 Great Ormond Street, there are 2 No. kitchen areas / rooms analysed (at 2nd and 3rd floors) which have reductions in daylight distribution not meeting BRE Guide default target (reductions of 47% and 61% respectively).

3.32 **No. 29 Great Ormond Street:**

3.33 **Background:** Consideration of room uses / layouts for this property have been on an assumed basis (no plans located).

3.34 From initial review of VOA council tax records, 5 No. flats appear indicated (at ground 1st, 2nd, 3rd & 4th floor).

3.35 For the purpose of analysis by AY, in respect of anticipated habitable rooms served by windows facing Great Ormond Street, it has been assumed that there is a single room at ground floor and then two rooms for each floor above; thus 9 No. assumed for analysis. From external appearance and arrangements of other properties, this is a reasonable assumption although there is the possibility that the ground floor room may well be two rooms as opposed to a single room (although given the context of the proposal, impacts to daylight would still be fairly uniform should this be the case, providing rooms are of a similar depth). The use of these rooms is unknown but based upon arrangements of other properties, the anticipation is that these are more likely to be living / studio rooms. The studio room could be considered as the room that an occupant is anticipated to spend most time serving a multi-living purpose.

3.36 Again, based upon consideration of other similar properties, we would anticipate that typically, each flat has at least one habitable single-aspect room served by window(s) facing onto Great Ormond Street / facing the proposal. However, in most instances, the flat is also anticipated to have at least one further habitable room served by a window in the rear elevation which will not be affected by the proposed development.

Daylight VSC: In terms of impacts from the proposal upon daylight VSC to windows serving anticipated habitable rooms (possible living / studio rooms), this is summarised in **Table 2.1** – Daylight VSC review Summary for Windows within the front elevation serving habitable rooms (average VSCs considered);

Table 2.1 - Daylight VSC review Summary for Windows within the front elevation serving habitable rooms (average VSCs considered)

Floor	Window ref.	Existing VSC	Proposed VSC	% reduction
Ground	W1,2&3 /80	22.6	9.3	59.0%
1st floor	W1,2,3&4 /81	25.7	10.7	58.4%
2nd floor	W1,2,3&4 /82	28.6	12.2	57.2%
3rd floor	W1,2,3&4 /83	30.8	14.0	54.6%
4th floor	W1&2 /84	32.9	16.8	48.8%

3.37 From **Table 2.1,** it is evident that all reductions do not meet BRE Guide default target criteria / would be noticeable. The results indicate 'major adverse' reductions to daylight VSC (which would be applicable to all 17 No. windows analysed assumed to serve 9 No. habitable rooms).

3.38 If a retained VSC level of 'mid-teens' is seen as a possible informal alternative target, in terms of retained VSC values, all would be below as retained excepting the top / 4th floor.

3.39 Retained VSC values at ground floor are just below a VSC of 10 and at 1st floor, just above thus significant impact, in particular. At 2nd floor, retained VSC values are still only circa 12 and at 3rd floor circa 14.

3.40 **Daylight Distribution:** For any applicable reductions to daylight distribution to habitable rooms within No. 29 Great Ormond Street, with rooms anticipated to be possibly living / studios rooms, all of these do not meet BRE Guide default target criteria and summarised in **Table 2.2** – Daylight Distribution review Summary for anticipated living / studio rooms having reductions not meeting BRE

Table 2.2 – Daylight Distribution review Summary for anticipated living / studio rooms having reductions not meeting BRE

Floor	Room refs.	Existing (%) NSL range	Proposed (%) NSL range	% reduction range
Anticipated living room / studio				
Ground	R2/80	79.0	32.0	59.2%
1st floor	R1/81, R2/81	72.5 to 74.3	20.3 to 21.0	71.0% to 72.6%
2nd floor	R1/82, R2/82	97.5 to 97.7	22.4 to 22.7	76.7% to 77.0%
3rd floor	R1/83, R2/83	98.7 to 98.9	27.3	72.3% to 72.5%
4th floor	R1/84, R2/84	96.8 to 97.0	38.2 to 38.4	60.4% to 60.6%

3.41 From the **Table 2.2**, it can be seen that for 9 No. habitable rooms (possibly living / studio rooms), reductions in daylight distribution do not meet BRE Guide default target criteria / would be noticeable. Reductions could be considered 'major adverse' to all 9 No. rooms.

3.42 Retained levels of daylight distribution would be particular low to 7 No. rooms (ranging just 20.3% to 32.0% daylight distribution); thus as an average, broadly just a quarter of the room having access to direct skylight at the working plane. Retained levels at 4th floor are circa 38% daylight distribution thus still considered low.

3.43 **No. 31, 33 & 35 Great Ormond Street:**

3.44 **Background:** Consideration of room uses / layouts for this property have been on an assumed basis (no plans located) although it is anticipated that the ground floor is commercial thus ordinarily excluded from review.

3.45 From initial review of VOA council tax records, 9 No. flats appear indicated (floor locations not highlighted).

3.46 For the purpose of analysis by AY, in respect of anticipated habitable rooms served by windows facing Great Ormond Street, it has been assumed that there are 16 No. rooms applicable for review ranging across 1st, 2nd , 3rd & 4th floor with rooms being served by two windows excepting the 4th floor with each room assumed to be served by a single dormer window. From external appearance and arrangements of other properties, this is a reasonable assumption. The use of these rooms is unknown but based upon arrangements of other properties, the anticipation is that these are more likely to be living / studio rooms. The studio room could be considered as the room that an occupant is anticipated to spend most time serving a multi-living purpose.

3.47 Again, based upon consideration of other similar properties, we would anticipate that typically, each flat has at least one habitable single-aspect room served by window(s) facing onto Great Ormond Street / facing the proposal. However, in most instances, the flat is also anticipated to have at least one further habitable room served by a window in the rear elevation which will not be affected by the proposed development.

3.48 **Daylight VSC:** In terms of impacts from the proposal upon daylight VSC to windows serving anticipated habitable rooms (anticipated a reasonable proportion of living / studio rooms), this is summarised in **Table 3.1** – Daylight VSC review Summary for Windows within the front elevation serving habitable rooms (average VSCs considered);

Table 3.1 - Daylight VSC review Summary for Windows within the front elevation serving habitable rooms (average VSCs considered)

Floor	Window ref.	Existing VSC	Proposed VSC	% reduction
1st floor	W5&6/81 & W1-6/91	26.2	10.5	60.0%
2nd floor	W5&6/82 & W1-6/92	29.0	12.0	58.6%
3rd floor	W5&6/83 & W1-6/93	31.3	13.8	55.9%
4th floor	W3/84 & W2-4/94	33.2	16.6	50.0%

3.49 From **Table 3.1,** it is evident that all reductions do not meet BRE Guide default target criteria / would be noticeable. The results indicate 'major adverse' reductions to daylight VSC (which would be applicable to all 28 No. windows applicable which has been assumed to serve 16 No. rooms).

3.50 If a retained VSC level of 'mid-teens' is seen as a possible informal alternative target, in terms of retained VSC values, all would be below as retained excepting the top / 4th floor.

3.51 Retained VSC values at 1st floor are to a VSC of circa 10 thus significant impact, in particular. At 2nd floor retained VSC values are still only circa 12 and at 3rd floor circa 14.

3.52 **Daylight Distribution:** For any applicable reductions to daylight distribution for habitable rooms (anticipated a reasonable proportion of living / studio rooms), all of these do not meet BRE Guide default target criteria and these are summarised in **Table 3.2** – Daylight Distribution review Summary for habitable rooms having reductions not meeting BRE.

Table 3.2 – Daylight Distribution review Summary for habitable rooms having reductions not meeting BRE

Floor	Room refs.	Existing (%) NSL range	Proposed (%) NSL range	% reduction range
Reasonable proportion anticipated living room / studio				
1st floor	R3/81, R1-3/91	76.8 to 82.3	19.1 to 19.6	74.8% to 76.3%
2nd floor	R3/82, R1-3/92	96.5 to 98.7	21.0 to 21.4	78.2% to 78.4%
3rd floor	R3/83, R1-3/93	98.3 to 98.7	24.7 to 27.5	72.1% to 74.9%
4th floor	R3/84, R1-3/94	96.9 to 98.5	38.2 to 40.5	58.9% to 60.6%

3.53 From the **Table 3.2**, it can be seen that for 16 No. habitable rooms (anticipated a reasonable proportion of living / studio rooms), reductions in daylight distribution do not meet BRE Guide default target criteria / would be noticeable. Reductions could be considered 'major adverse' to all 16 No. rooms.

3.54 Retained levels of daylight distribution would be particular low at 1st, 2nd and 3rd floor; 12 No. rooms assumed in total (ranging just 19.1% to 27.5% daylight distribution). Thus on average, broadly just a quarter of the room having access to direct skylight at the working plane. Retained levels at 4th floor are circa 40% daylight distribution thus still considered low.

3.55 **Nos. 37 & 39 Great Ormond Street:**

3.56 **Background:** Historic floor plans from LBC have been utilised for the room uses / layouts which present as 10 No. flats. From initial review of VOA council tax records, this also accords with 10 No. flats being indicated. AY have also undertaken an inspection of flat 8 (3rd floor) thus inconclusion of an updated statement dated 14.10.22.

3.57 Typically, each flat has one living / studio room and either a linked bedroom area (analysed separately) or actual separate bedroom area with each being single-aspect room(s) served by window(s) facing onto Great Ormond Street / facing the proposal. In addition, the flats also appear to have a separate rear kitchen/dining room served by a window in the rear elevation which will not be affected by the proposed development.

3.58 Thus, for the purpose of analysis, 10 No. living / studio rooms and 10 No. bedrooms have been analysed as being rooms served by windows in the front elevation affected by the proposed scheme. The living / studio room could be considered as the room that an occupant is anticipated to spend most time serving a multi-living purpose.

Daylight VSC: In terms of impacts from the proposal upon daylight VSC to windows serving anticipated habitable rooms is summarised in **Table 4.1** – Daylight VSC review Summary for Windows within the front elevation serving habitable rooms (average VSCs considered);

Table 4.1 - Daylight VSC review Summary for Windows within the front elevation serving habitable rooms (average VSCs considered)

Floor	Window ref.	Existing VSC	Proposed VSC	% reduction
Ground	W1,2,3&4 /101	22.4	9.0	59.9%
1st floor	W1,2,3&4 /102	25.3	10.1	60.0%
2nd floor	W1,2,3&4 /103	28.1	11.5	59.1%
3rd floor	W1,2,3&4 /104	30.4	13.1	56.9%
4th floor	W1,2,3&4 /105	32.0	15.2	52.6%

3.59 From **Table 4.1,** it is evident that all reductions do not meet BRE Guide default target criteria / would be noticeable. The results indicate 'major adverse' reductions to daylight VSC which would be applicable to all 20 No. windows which serve 10 No. living / studio rooms and 10 No. bedroom areas / bedrooms.

3.60 If a retained VSC level of 'mid-teens' is seen as a possible informal alternative target, in terms of retained VSC values, all would be below as retained excepting the top / 4th floor which is at the bottom end of the 'mid-teens' range.

3.61 Retained VSC values are very limited at the lower floors; a VSC of circa 9 at ground, circa 10 at 1st floor and circa.11.5 at 2nd floor thus significant impact, in particular. At 3rd floor retained VSC values are still only circa 13 and at 4th floor circa 15.

3.62 To highlight, given respective living rooms and bedrooms are adjacent at each floor, in terms of percentage reduction or retained levels, this would be applicable to either room use for the given floor level considered.

3.63 **Daylight Distribution:** For any applicable reductions to daylight distribution for rooms; 10 No. living rooms and 10 No. bedroom areas / bedrooms, all of these do not meet BRE Guide default target criteria and these are summarised in **Table 4.2** – Daylight Distribution review Summary for habitable rooms having reductions not meeting BRE.

Table 4.2 – Daylight Distribution review Summary for habitable rooms having reductions not meeting BRE

Floor	Room refs.	Existing (%) NSL range	Proposed (%) NSL range	% reduction range
Living / studio rooms				
Ground	R1/101 & R4/101	56.9 to 58.9	17.0 to 17.7	68.9% to 71.1%
1st floor	R1/102 & R4/102	58.5 to 71.8	15.3 to 16.2	73.8% to 77.4%
2nd floor	R1/103 & R4/103	87.2 to 95.7	18.0 to 18.3	79.4% to 80.9%
3rd floor	R1/104 & R4/104	93.4 to 95.7	19.3 to 21.9	77.1% to 79.4%
4th floor	R1/105 & R4/105	96.4 to 97.1	22.3 to 24.4	74.7% to 77.0%
Bedrooms / bedroom areas				
Ground	R2/101 & R3/101	63.7 to 65.5	18.3 to 18.4	71.2% to 71.8%
1st floor	R2/102 & R3/102	69.3 to 74.8	16.6 to 17.6	76.1% to 76.5%
2nd floor	R2/103 & R3/103	96.4 to 99.4	18.6 to 20.8	79.1% to 80.7%
3rd floor	R2/104 & R3/104	94.8 to 99.4	23.8 to 24.6	75.0% to 75.3%
4th floor	R2/105 & R3/105	97.9 to 99.8	circa 25.4	74.0% to 74.5%

3.64 From the **Table 4.2**, it can be seen that for the 10 No. living rooms and 10 No. bedrooms / bedroom areas, reductions in daylight distribution do not meet BRE Guide default target criteria / would be noticeable. Reductions could be considered 'major adverse' to all 20 No. rooms.

3.65 Retained levels of daylight distribution would be particular low to all 20 No. rooms (ranging just 15.3% to 25.4% daylight distribution); thus equal or typically less than a quarter of the room having access to direct skylight at the working plane for either living rooms or bedrooms.

3.66 **No. 41 Great Ormond Street (GOSH Charity property):**

3.67 **Background:** Consideration of room uses / layouts for this property are based upon a set of floor plans that AV have obtained from GOSH.

3.68 From initial review of VOA council tax records, 4 No. flats appear indicated (at ground 1st, 2nd & 3rd floor).

3.69 From the analysis by AY, for anticipated habitable rooms served by windows facing Great Ormond Street, each floor has a living rooms and in some instances, a separate kitchen area or at 3rd floor, a separate bedroom, also served by windows in the front elevation.

3.70 Thus, whilst AY confirm that each flat will have at least one habitable single-aspect room served by window(s) facing onto Great Ormond Street / facing the proposal, they also note the flats will have at least one further habitable room served by a window in the rear elevation which will not be affected by the proposed development.

3.71 **Daylight VSC:** In terms of impacts from the proposal upon daylight VSC to windows serving anticipated habitable rooms (primarily living / studio rooms), this is summarised in **Table 5.1** – Daylight VSC review Summary for Windows within the front elevation serving habitable rooms (average VSCs considered);

Table 5.1 - Daylight VSC review Summary for Windows within the front elevation serving habitable rooms (average VSCs considered)

Floor	Window ref.	Existing VSC	Proposed VSC	% reduction
Ground	W1&2 / 111	22.4	9.4	57.9%
1st floor	W1,2&3 /112	25.9	11.0	57.5%
2nd floor	W1,2&3 /113	29.1	12.8	56.0%
3rd floor	W3&4 /114	31.6	15.6	50.8%

3.72 From **Table 5.1,** it is evident that all reductions do not meet BRE Guide default target criteria / would be noticeable. The results indicate 'major adverse' reductions to daylight VSC (which would be to all 10 No. windows applicable which has been assumed to serve 7 No. rooms).

3.73 If a retained VSC level of 'mid-teens' is considered as a possible alternative target, in terms of retained VSC values, all would be below as retained excepting the top / 3rd floor which is at the lower end of 'mid-teens'.

3.74 Retained VSC values at ground floor are just below a VSC of 10 and at 1st floor, just above thus significant impact, in particular. At 2nd floor retained VSC values are still only slightly below circa 13 and at 3rd floor circa 15.5.

3.75 **Daylight Distribution:** For any applicable reductions to daylight distribution for rooms; 4 No. living rooms and 1 No. bedroom areas / bedrooms and also 2 No. kitchens, all of these do not meet BRE Guide default target criteria and these are summarised in **Table 5.2** – Daylight Distribution review Summary for habitable rooms having reductions not meeting BRE.

Table 5.2 – Daylight Distribution review Summary for habitable rooms having reductions not meeting BRE

Floor	Room refs.	Existing (%) NSL range	Proposed (%) NSL range	% reduction range
Ground	R1/111	70.5	24.5	65.3%
1st floor	R1/112, R2/112	98.8 to 99.0	29.5 to 30.8	68.9% to 70.2%
2nd floor	R1/113, R2/113	98.9 to 99.0	32.9 to 35.5	64.1% to 66.7%
3rd floor	R1/114, R2/114	90.9 to 94.3	31.8 to 34.7	61.8% to 66.2%

3.76 From the **Table 5.2**, it can be seen that for 7 No. habitable rooms (primarily living / studio rooms), reductions in daylight distribution do not meet BRE Guide default target criteria / would be noticeable. Reductions could be considered 'major adverse' to all 7 No. rooms.

3.77 Retained levels of daylight distribution would be particular low to all 7 No. rooms (ranging 24.5% to 35.5% daylight distribution); thus broadly ranging a quarter to a third of the room area having access to direct skylight at the working plane.

3.78 **No. 45 Great Ormond Street (GOSH Charity property):**

3.79 **Background:** Consideration of room uses / layouts for this property are based upon a set of floor plans that AV have obtained from GOSH.

3.80 From initial review of VOA council tax records, 3 No. flats appear indicated (at 1st, 2nd & 3rd floor). We understand from AY that ground and basement is utilised as office / meeting rooms and AY state that the majority of the property is used mostly for meetings.

3.81 From the analysis by AY, for anticipated habitable rooms, served by windows facing Great Ormond Street, each floor at 1st, 2nd and 3rd floor has a kitchen and at 1st and 2nd floor, there is a separate living room reviewed and at 3rd floor a separate bedroom, again all served by windows in the front elevation.

3.82 AY highlight that the plans indicate that the property is dual-aspect; whilst each flat has at least one habitable single-aspect room served by window(s) facing onto Great Ormond Street / facing the proposal the flats would also have at least one further habitable room served by a window in the rear elevation which will not be affected by the proposed development.

3.83 **Daylight VSC:** In terms of impacts from the proposal upon daylight VSC to windows serving anticipated habitable rooms (including living / studio rooms), this is summarised in **Table 6.1** – Daylight VSC review Summary for Windows within the front elevation serving habitable rooms (average VSCs considered);

Table 6.1 - Daylight VSC review Summary for Windows within the front elevation serving habitable rooms (average VSCs considered)

Floor	Window ref.	Existing VSC	Proposed VSC	% reduction
1st floor	W1,2&3 /122	24.4	12.0	50.8%
2nd floor	W1,2&3 /123	27.5	14.0	49.1%
3rd floor	W1&2 /124	29.9	16.8	43.7%

3.84 From **Table 6.1,** it is evident that all reductions do not meet BRE Guide default target criteria / would be noticeable. The results indicate 'major adverse' reductions to daylight VSC (which would be applicable to all 8 No. windows applicable which is understood to serve 6 No. rooms).

3.85 If a retained VSC level of 'mid-teens' is seen as a possible alternative target, in terms of retained VSC values, all would be below as retained excepting the top / 3rd floor.

3.86 Retained VSC values at 1st floor are a VSC of 12 and at 2nd floor circa 14. At 3rd floor retained VSC values are nearing a VSC of 17.

3.87 **Daylight Distribution:** For any applicable reductions to daylight distribution for rooms; 2 No. living rooms and 1 No. bedroom areas / bedrooms and also 3 No. kitchens, all of these do not meet BRE Guide default target criteria and these are summarised in **Table 6.2** – Daylight Distribution review Summary for habitable rooms having reductions not meeting BRE.

Table 6.2 – Daylight Distribution review Summary for habitable rooms having reductions not meeting BRE

Floor	Room refs.	Existing (%) NSL range	Proposed (%) NSL range	% reduction range
Anticipated living room / studio				
1st floor	R1/122	97.3	34.4	64.6%
2nd floor	R1/123	97.3	33.4	65.7%
Bedroom				
3rd floor	R1/124	60.6	24.0	60.5%
Kitchens				
1st floor	R2/122	97.8	44.9	54.1%
2nd floor	R2/123	97.3	44.5	54.2%
3rd floor	R2/124	90.8	46.5	48.8%

3.88 From the **Table 6.2**, it can be seen that for 7 No. habitable rooms (including 2 No. primarily living / studio rooms), reductions in daylight distribution do not meet BRE Guide default target criteria / would be noticeable. Reductions could be considered 'major adverse' to all 7 No. rooms.

3.89 Retained levels of daylight distribution would be particular low to 2 No. living rooms room with circa a third of the room having access to direct skylight at the working plane and this reduces to one quarter for the 1 No. bedroom although daylight distribution is recognised as less important to a bedroom. Retained levels to each of the kitchens at 1st, 2nd & 3rd floor is circa 45% daylight distribution, so just below half of the room having access to direct skylight at the working plane

3.90 **No. 47 Great Ormond Street:**

3.91 **Background:** Historic floor plans from LBC planning portal have been utilised for the room uses / layouts which present 3 No. flats.

3.92 From initial review of VOA council tax records, this also accords with 3 No. flats appearing indicated; a maisonette arranged over basement and ground floor and at 1st and 2nd floor each having a flat. It is not known whether the flat at 2nd floor is linked to anticipated bedrooms at 3rd floor / dormer level. AY have considered the potential of habitable rooms on all floors.

3.93 For analysis by AY, a single-aspect living / studio room has been assumed at ground, 1st and 2nd floor served by window(s) facing onto Great Ormond Street / facing the proposal. Equally, the bedrooms have been considered as single aspect at basement and 3rd floor. In addition, the flats also appear to have separate rear habitable room served by a window in the rear elevation which will not be affected by the proposed development.

3.94 Thus, for the purpose of analysis, 3 No. living / studio rooms and 3 No. bedrooms have been analysed as being rooms served by windows in the front elevation affected by the proposed scheme. The studio room could be considered as the room that an occupant is anticipated to spend most time serving a multi-living purpose.

3.95 **Daylight VSC:** In terms of impacts from the proposal upon daylight VSC to windows serving anticipated habitable rooms (including 3 No. living / studio rooms), this is summarised in **Table 7.1** – Daylight VSC review Summary for Windows within the front elevation serving habitable rooms (average VSCs considered);

Table 7.1 - Daylight VSC review Summary for Windows within the front elevation serving habitable rooms (average VSCs considered)

Floor	Window ref.	Existing VSC	Proposed VSC	% reduction
Basement	W1&W2 /130	5.3	5.3	meets
Ground	W2&3 /131	20.0	10.8	45.8%
1st floor	W1&2/ 132	23.1	12.6	45.3%
2nd floor	W1&2 /133	26.1	14.9	43.1%
3rd floor	W1&2 /134	28.8	17.6	38.9%

3.96 From **Table 7.1,** it is evident that all reductions, excepting a basement bedroom, do not meet BRE Guide default target / would be noticeable. For results not meeting default

target criteria, the results indicate 'major adverse' reductions to daylight at ground, 1st and 2nd floor (thus anticipated to be living / studio rooms) and at 3rd floor 'moderate' adverse.

3.97 If a retained VSC level of 'mid-teens' is seen as a possible informal alternative target, in terms of retained VSC values, all would be below as retained excepting the top / 3rd floor.

3.98 Retained VSC values are very limited at the lower floors being just a VSC value of circa 11 at ground, circa 12.5 at 1st floor and just below 15 at 2nd floor. At 3rd floor, retained VSC values are circa 17.5.

3.99 **Daylight Distribution:** For any applicable reductions to daylight distribution for rooms; 3 No. living / studio rooms and 3 No. bedrooms all of these do not meet BRE Guide default target criteria and these are summarised in **Table 7.2** – Daylight Distribution review Summary for habitable rooms having reductions not meeting BRE.

Table 7.2 – Daylight Distribution review Summary for habitable rooms having reductions not meeting BRE

Floor	Room refs.	Existing (%) NSL range	Proposed (%) NSL range	% reduction range
Living / studio rooms				
Ground	R1/131	97.8	44.8	54.1%
1st floor	R1/132	95.4	42.3	55.6%
2nd floor	R1/133	93.6	36.8	60.7%
Bedrooms				
Basement	R1/130	99.7	35.8	64.1%
3rd floor	R1/134 & R2/134	72.7 to 90.4	19.1 to 29.0	67.9% to 73.8%

3.100 From the **Table 7.2**, it can be seen that for the 3 No. living / studio rooms and 3 No. bedrooms, reductions in daylight distribution do not meet BRE Guide default target criteria / would be noticeable. Reductions could be considered 'major adverse' to all 6 No. habitable rooms.

3.101 Retained levels of daylight distribution would typically range 35% to 45% thus just over a third to approaching half of the room having access to direct skylight at the working plane. For 2 No. bedrooms at 3rd floor, these have below this range; 19% and 29% respectively.

3.102 **No. 49 Great Ormond Street:**

3.103 **Background:** Room uses / layouts utilised for analysis have been based upon inspection of the property by AY. It is understood that the property is a single dwelling.

3.104 Whilst this property has a number of single-aspect rooms served by window(s) facing onto Great Ormond Street / facing the proposal, the property also has a number of separate rear rooms served by windows in the rear elevation which will not be affected by the proposed development.

3.105 Thus for the purpose of review, AY have analysed 7 No. rooms (an office, music room, dining room and study and 3 No. being bedrooms) served by windows in the front elevation affected by the proposed scheme.

3.106 **Daylight VSC:** In terms of impacts from the proposal upon daylight VSC to windows considered this is summarised in **Table 8.1** – Daylight VSC review Summary for Windows within the front elevation serving primarily habitable rooms (average VSCs considered);

Table 8.1 - Daylight VSC review Summary for Windows within the front elevation serving primarily habitable rooms (average VSCs considered)

Floor	Window ref.	Existing VSC	Proposed VSC	% reduction
Basement	W1&W2 / 140	7.46	6.8	meets
Ground	W1,2,3 / 141*	18.6	11.4	38.7%
1st floor	W1,2&3 /142	21.1	13.5	36.2%
2nd floor	W1,2,3,4&5 /143	23.2	16.0	31.0%
3rd floor	W1&2 /144	26.5	19.4	27.0%

**W5 / 141 excluded from VSC table as exception being a rear elevation window*

3.107 From **Table 8.2,** it is evident that all reductions, excepting the basement windows, do not meet BRE Guide default target / would be noticeable. For results not meeting default target criteria, the results indicate these are typically 'moderate adverse' reductions to daylight VSC to ground, 1st & 2nd floor and 'minor adverse' to 3rd floor (as highlighted, basement windows meeting BRE target in terms of reduction).

3.108 If a retained VSC level of 'mid-teens' is seen as a possible informal alternative target (applicable when reductions are not meeting target), in terms of retained VSC values, ground and 1st floor would be below 'mid-teens' (circa 11.5 and 13.5 respectively) and above at 2nd floor a VSC of 16 and 3rd floor circa 19.5.

3.109 **Daylight Distribution:** For any applicable reductions to daylight distribution for the 7 No. rooms considered, all of these do not meet BRE Guide default target criteria and these are summarised in **Table 8.2** – Daylight Distribution review Summary for primarily habitable rooms having reductions not meeting BRE.

Table 8.2 – Daylight Distribution review Summary for primarily habitable rooms having reductions not meeting BRE

Floor	Room refs.	Existing % NSL	Proposed % NSL	% reduction
Room use as noted				
Basement	R1/140–office	71.2	29.4	58.8%
Ground	R1/141–music room	58.7	25.9	55.9%
1st floor	R1/142-dining	89.7	47.7	46.8%
2nd floor	R1/143-study	91.9	49.4	46.2%
Bedrooms				
2nd floor	R2/143	87.3	52.7	39.7%
3rd floor	R1/144	72.3	36.5	49.5%
3rd floor	R2/144	66.3	45.5	31.4%

3.110 From the **Table 8.2**, it is evident that all reductions, do not meet BRE Guide default target / would be noticeable. For results not meeting default target criteria, the results indicate these are typically 'major adverse' reductions excepting 2 No. bedrooms (2nd floor and 1 No. at 3rd floor).

3.111 Retained levels of daylight distribution would be particularly low to the basement and ground floor rooms analysed (between a quarter and a third of daylight distribution); other rooms are typically approaching half of the room having access to direct skylight at the working plane.

3.112 **No. 51 Great Ormond Street (GOSH Charity property):**

3.113 For applicable reductions in daylight VSC, these meet BRE Guide default target criteria (as background, reductions considered in respect of existing and proposed average VSC for a multi-window having windows of equal size).

3.114 For applicable reductions in daylight distribution, these meet BRE Guide default target criteria except in two isolated instances;

- 1st floor living / studio room (room ref. R1/151); existing daylight distribution of 82.4% reduced to 60.8% in the proposed scenario (thus 26.2% reduction).

- 2nd floor gallery room (room ref. R1/152); existing daylight distribution of 73.2% reduced to 56.6% in the proposed scenario (thus 22.8% reduction).

3.115 Thus, in summary, impacts to daylight meet BRE Guide default target criteria except in two isolated instances relating to daylight distribution which can be considered as 'minor adverse' reductions and ordinarily such isolated impacts would be considered acceptable for an urban context.

3.116 **ORDE HALL STREET**

3.117 **Nos. 29 & 30 Orde Hall Street:**

3.118 **Background:** These properties are respectively positioned at either side of the north end of Orde Hall Street where this abuts Great Ormond Street (No. 29 on the west side of Orde Hall Street and No. 30 on the east side). Thus, each property is effectively a corner property, whilst the main elevation faces onto Orde Hall Street, they also have a return elevation fronting onto Great Ormond Street.

3.119 Accordingly, it is evident that for those windows facing onto Great Ormond Street / facing the proposal, in most instances, such windows will also be served by a window(s) on the immediate returning main elevation facing on Orde Hall Street; thus dual-aspect comer rooms primarily exist for rooms with windows on the Great Ormond Street elevation.

3.120 Some limited floor plans have been located for No.30 Orde Hall Street for the basement and ground floor. These have assisted in inferring the upper floors (as well as from external observation); such considerations have also been utilised for assumptions on the arrangement within No. 29 Orde Hall Street given they are similar properties.

3.121 From initial review of VOA council tax records, residential is indicated as follows;
No. 29 – 3 No. flats – maisonette at lower ground (basement) and ground, 1st floor flat and maisonette at 2nd & 3rd floor.
No. 30 – 4 No. flats (at ground, 1st, 2nd & 3rd floor)

3.122 **Daylight VSC:** In terms of impacts from the proposal upon daylight VSC to windows serving anticipated habitable rooms, for these corner properties, it would be relevant to consider the average VSC on a per room basis given these rooms are anticipated to be dual-aspect and that the windows on both elevations are of similar size. VSC review is summarised in **Table 9.1** - Daylight VSC review Summary for Windows considered serving habitable rooms (average VSCs considered on a room basis);

Table 9.1 – Daylight VSC review Summary for Windows considered serving habitable rooms (average VSCs considered on a room basis);

Floor	Property No.	Window ref.	Existing VSC	Proposed VSC	% reduction
Basement	30	W1&2 /60	17.5	10.7	38.7%
Ground	29	W1&2 /71	20.6	13.1	36.4%
Ground	30	W1&2 /61	20.6	12.7	38.1%
1st floor	29	W2,3&4 /72	25.0	14.5	41.9%
1st floor	30	W1,2&3 /62	24.5	14.7	39.8%
2nd floor	29	W2,3&4 /73	28.8	17.5	39.1%
2nd floor	30	W1,2&3 /63	27.7	17.4	37.4%
3rd floor	29	W2,3&4 /74	31.8	20.4	36.0%
3rd floor	30	W1,2&3 /64	30.1	19.6	34.9%

No. 29 – basement room R1/170 excluded as meets VSC / possibly non-hab. bathroom

3.123 From **Table 9.1** it can be concluded that all reductions (based on an average per room) do not meet BRE Guide default target criteria / would be noticeable. There are typically 'moderate adverse' reductions to daylight VSC on this basis with an isolated room VSC for the 1st floor to No. 29 Orde Hall Street just falling into 'major adverse'.

3.124 If a retained VSC level of 'mid-teens' is seen as a possible informal alternative target, in terms of retained VSC room average values, these would be below at basement, ground and 1st floor and equal or slightly above at 2nd and 3rd floor.

3.125 Retained VSC values on a room average basis are at basement, just below 11, ground floor circa 13 and 1st floor just below 15. At 2nd floor retained room average VSCs are circa 17.5 and at 3rd floor circa 20.

3.126 **Daylight Distribution:** For any applicable reductions to daylight distribution to habitable rooms within respective properties at Nos. 29 & 30 Orde Hall Street, given the dual-aspect arrangement of the applicable rooms considered, reductions in daylight distribution, meets BRE Guide default target criteria with the isolated exception of the analysis presented for the room ref. R1/63 at 2nd floor within No. 30 Orde Hall Street which is presenting a 30.3% reduction. It would appear that there may be an error in the daylight distribution analysis presented for this particular room given the dual-aspect nature of the room and similarities to other rooms which are readily meeting BRE Guide default target criteria; it is suggested that AY should check the analysis results for this room and update as applicable.

3.127 SUMMARY ON DAYLIGHT

3.128 It can be summarised that for applicable reductions to both daylight VSC and daylight distribution, for Spens House at Lamb's Conduit Street, 63 Lamb's Conduit Street and Nos. 19, 21, 55, 57, 59 & 61 Great Ormond Street, such reductions meet BRE Guide default target criteria and should be considered acceptable. (As background, No. 21 Great Ormond Street is included within the category as whilst for reductions for 2 No. isolated windows have reductions just slightly greater that a 20% reduction, the average VSC for the room would be applicable and, on that basis, such a reduction would then meet BRE Guide default target criteria).

3.129 For property Nos. 51 Great Ormond Street, there are 2 No. isolated rooms having a 'minor adverse' reduction to daylight distribution. Whilst there is also 1 No. window with a slightly greater that 20% reduction for VSC, the average VSC for the room would be applicable and on that basis, such a reduction would then meet BRE Guide default target criteria. For these isolated departures to daylight distribution, for an urban context, this is often considered reasonable and acceptable.

3.130 For respective property Nos. 23 Great Ormond Street, 29 and 30 Orde Hall Street, reductions in daylight distribution could be considered meeting BRE Guide default target criteria except for a ground floor anticipated living/studio room within 23 Great Ormond Street (room ref. R3/30) which has a 'moderate adverse' reduction. For daylight VSC, reductions are typically 'minor adverse' to 23 Great Ormond Street or typically 'moderate adverse' for 29 and 30 Orde Hall Street. Whilst daylight VSC and daylight distribution are of equal importance, given the typical dual-aspect nature of the rooms within 29 and 30 Orde Hall Street, we consider that whilst the impacts are anticipated to be noticeable, such impacts, should not result in any major impacts for daylight provision to these rooms.

3.131 For property No. 25 Great Ormond Street, there are typically 'moderate adverse' reductions to both daylight VSC and daylight distribution. In consideration of retained values, VSC values are not below mid-teens and not below a daylight distribution of 60% of the room area having access to direct skylight with the exception of a ground floor and basement room considered and for which reductions are becoming more challenging to consider as 'acceptable'.

3.132 For remaining property numbers Nos. 27, 29, 31-33-35, 37-39, 41, 45, & 47 and to a slightly lesser extent for 49 Great Ormond Street, reductions in both daylight VSC and daylight distribution can be considered 'major adverse'. Reductions will be significant and noticeable. The majority of VSCs will be reduced to below mid-teens where

existing conditions typically ranged between a VSC of 20 to 30 so reductions of 50% are not uncommon and in some isolated instances reaching circa 60% reduction. The majority of daylight distribution will be reduced to below 30% daylight distribution where existing conditions typically ranged between a daylight distribution of high 70%, 80% and 90% so reductions of mid-50s% to mid-70s% are not uncommon and in some isolated instances reaching circa 80% reduction. Such impacts could be considered 'unacceptable', especially in consideration that in terms of room uses of particular importance, circa 40 No. living room/ studios would be affected.

3.133 Given the aforementioned, and in particular **para. 3.132** and a slightly lesser extent **para 3.131,** even in consideration of such factors as an inner London urban context site, the significant clear benefits that a 'world-class' medical additional facility would bring, it will still be difficult for committee members to potentially consider the *'benefits outweigh the harm'*.

3.134 Whilst, committee can only consider the scheme before them and no doubt fully recognised and supportive of the facilities that would be provided in terms of benefits (and indeed 'world-class' facilities), the question arises as to whether there is an alternative design that can deliver such facilities but to mitigate some of the significant adverse impacts upon daylight to a significant number of neighbouring residential / dwelling properties by way of a refined / reduced massing; we understand that for the facilities to be provided, there is not really scope for such amendment.

3.135 Even if considering potential 'alternative targeting' towards a retained daylight VSC of say 'mid-teens' for inner London (thus a VSC of 15 to 17.9), where reductions exceed BRE Guide default target criteria, circa over 75% of the 40 No. dwelling living / studio rooms highlighted as having major adverse reductions would **also** have a retained level of VSC below 'mid-teens' thus the majority not meeting this possible 'alternative criteria' consideration. In addition, there are also the separate significant major reductions in daylight distribution again, associated with these particular rooms / properties. There are no 'common' alternative targets for retained levels of daylight distribution where reductions do not meet BRE Guide default target criteria but clearly, as for adversity for VSC, these same dwellings will have significant impacts to daylight distribution and in most instances, with a retained daylight distribution well below 50% of the room area having the benefit of direct daylight at the working plane.

3.136 Habitable rooms with such significant impacts to VSC and / or daylight distribution will feel 'gloomy' with the change significantly noticed and have a need to rely more on artificial lighting. This being compared to existing levels of daylight which typically could be considered reasonable for an urban context.

3.137 As a background note, whilst VSC 'mid-teens' has become a more common reference for inner London redevelopment which has a significant impact to the daylight to neighbouring properties (having evolved from the Whitechapel Estate decision in 2018; appeal ref. APP/E5900/W/17/3171437 and Monmouth House prior to that), there have been more recent appeals which have sought slightly differing, more constrained views with consideration to two appeal cases namely, Woodlands Nursing Home, 1 Dugard Way (Elephant & Castle) – appeal ref. APP/N5660/W/20/3248960, and also 8 Albert Embankment (Lambeth) – appeal ref. APP/N5660/V/20/3254203. In summary, the Woodlands case considered an alternative VSC target of 18 for living rooms and 16 for living rooms (on interpretation, this would represent the top-end of 'mid-teens' for living rooms and mid-point for bedrooms). For 8 Albert Embankment, specific reference is made to harm to the living conditions of neighbouring residents from *reductions* in daylight (thus for consideration for larger reductions, not solely an alternative target for retained levels). In short, whilst an informal target of 'mid-teens' has some reference, suitable 'adaption' is also required for the given room uses and losses and overall context.

3.138 Supplementary Comments;

3.139 In terms of AY review and seeking to provide some justification to such significant impacts, we note that supplementary review of the Average Daylight Factor (ADF) review has also been submitted, even though for the worst affected properties we are still seeing circa 50-60% reductions in ADF and proposed retained values significantly below the target ADF for a given room use.

3.140 However, other then the aforementioned very broad observation, we do not consider ADF is an appropriate for neighbouring daylight review due to a number of factors. Such factors include that ADF review has never been encouraged for neighbouring review due to various limitations of not knowing exact inputting data for which the calculation relies upon e.g. exact room arrangement, finishes / reflectivity within the room, definitive use of the room etc. (VSC analysis does not require such details, although daylight distribution does still require some reasonable consideration on the room layout). The BRE Guide has always flagged that use of the ADF is not generally recommended as a neighbouring test due to various limitations, some of which we have already highlighted. However, notwithstanding this, 'ADF' is no longer a consideration for daylight review even within proposed new dwellings, since this methodology is now omitted from the new BRE Guide 2022 (3rd ed).

3.141 In also adding some further background to this summary, we also note that existing VSC levels have been mapped by AY to 5 No. residential sample areas within the

overall neighbourhood / context but of sufficient distance as not being affected by the proposed scheme.

3.142 The background to such a review is seeking to provide similar typologies within the area as having similar retained levels to those which would result from the proposed scheme for those properties applicable for review. Such consideration is usually for broad VSC review (as not knowing room layouts or uses when AY have examined such sites). There are limitations in obviously seeking to utilise such comparables and having considered the 5 No. sites submitted by AY, we do not consider these as typical comparable typologies with that of the properties opposite the proposal at Great Ormond Street.

3.143 For example, Site 1 (Bevan House, Boswell St) reviewed by AY, has a much narrower street arrangement then Great Ormond Street and not characteristic of Great Ormond Street. The sites are historic and for those properties mapped, typically do not have modern structures / obstruction opposite; thus seeking to map VSCs of the past for current modern comparison is not so relevant. In several instances, the building / obstruction opposite those properties mapped for VSC by AY could be considered an equitable obstruction / mirror development opposite, relevant to Site 1, Site 3 (Russell Court, Woburn Place) and also Site 5 (Witley Court, Coram Street) – the obstruction from this application proposal could not be considered equitable to the properties opposite on Great Ormond Street. Typologies established from a long time in the past are considered less relevant then from the modern / current.

3.144 CONCLUSION ON DAYLIGHT

3.145 It is apparent that for neighbouring residential property Nos. 27, 29, 31-33-35, 37-39, 41, 45, & 47 and to a slightly lesser extent for 49 Great Ormond Street, there are reductions in both daylight VSC and daylight distribution which can be considered 'major adverse', noticeable and would typically leave rooms gloomy with a greater reliance upon artificial lighting. Included in part of this adversity are circa 40 No. living room / studios (primarily rooms). If assessment were to be considered in reference to an 'Environmental Impact Assessment' (EIA), we would conclude overall 'major adverse impact' for these properties. Especially, for living / studios rooms, reductions (and indeed retained levels) are challenging to consider as 'acceptable'.

3.146 For any impacts to neighbouring residential at Spens House at Lamb's Conduit Street; 63 Lamb's Conduit Street and Nos. 19, 21, 55, 57, 59 & 61 Great Ormond Street, such reductions meet BRE Guide default target criteria and should be considered acceptable. In addition, for 51 Great Ormond Street, reductions are typically meeting BRE Guide default target criteria.

3.147 For the remainder of properties reviewed relating to Nos. 23, 25 Great Ormond Street and 29 and 30 Orde Hall Street, reductions generally do not meet BRE Guide default target typically for daylight VSC (and for No. 25 Great Ormond Street, also for daylight distribution). In terms of adversity, these could be considered to range more 'minor' or 'moderate' impact adversity in reference to EIA (worst affected, towards the upper end).

3.148 Given the aforementioned, even in consideration of such factors as an inner London urban context site, the significant clear benefits that a 'world-class' medical additional facility would bring, it will still be difficult for committee members to potentially consider the *'benefits outweigh the harm'*. In recognition of the importance of this proposal, the question arises as to whether there is an alternative design that can deliver such facilities but to mitigate some of the significant adverse impacts upon daylight to a significant number of neighbouring residential / dwelling properties by way of a refined / reduced massing; we understand that for the facilities to be provided, there is not really scope for such amendment.

3.149 **Other comments on Daylight:** Whilst not strictly 'neighbouring properties', it is evident that the proposal will have some impact upon the overall Great Osmond Street Hospital site, especially for those existing windows directly behind facing the proposal and in close proximity. Should daylight be considered important to any of these areas, daylight analysis review should be submitted.

3.150 **NEIGHBOURING SUNLIGHT ANALYSIS REVIEW**

3.151 **Sunlight – Impact upon neighbouring habitable rooms:** In reference to the BRE Guide, *…'it is suggested that all main living rooms of dwellings, and conservatories, should be checked if they have a window facing within 90° of south. Kitchens and bedrooms are less important, although care should be taken not to block too much sun'* (part extract from BRE Guide para. 3.2.3).

3.152 Given the context and orientation of neighbouring properties, for those windows serving habitable rooms facing the proposal on the opposite side of Great Ormond Street, such windows are ordinarily north-west facing and therefore not applicable for review, so we concur with AY, that the majority of properties need not be considered for sunlight review.

3.153 However, two exceptions to this are No. 30 Orde Hall Street with the main elevation facing south-west (and along with some dual-aspect rooms with windows facing the proposal, there will be some affect from the proposal), and the south-west elevation of Spens House.

3.154 It is noted that AY have presented analysis review of No. 30 Orde Hall Street but not for Spens House. Given the context and distance of Spens House from the proposal and minimal impact to daylight, it is anticipated that for any applicable reductions in sunlight to Spens House, these are anticipated to meet BRE Guide default target criteria but it would be useful if AY could sample a couple of 'worst case' window positions (these being at the upper floors as the application proposal then becoming visible).

3.155 For the analysis results presented for 30 Orde Hall Street, it is noted that all 'north-west' facing windows would have reductions in both Annual Probable Sunlight Hours (APSH) and winter hours as not meeting BRE Guide default target criteria. However, such windows would ordinarily not be considered (due to their orientation / not facing within 90° for south) but have been considered due to the likelihood that all of these rooms are dual-aspect with windows also facing on the Orde Hall Street elevation which is south-west facing and so have been captured within the analysis. Whilst there are clearly large reductions in APSH and winter hours to windows facing north-west, reductions for those windows facing south-west / Orde Hall Street elevation meet BRE Guide default target criteria. Given that the BRE Guide methodology for rooms served by more than one window also allows for overall sunlight analysis on a per room basis (subject to not simply adding analysis for all windows together) or to simply consider

the best sunlit window in each room case, it is evident that such impacts would meet BRE Guide default target criteria and should be considered acceptable.

3.156 **Sunlight – Impact upon neighbouring amenity**: Given the proposal and surrounding context orientation, we concur that any amenity areas to neighbouring properties need not be analysed.

3.157 Other comments on Sunlight: Whilst not strictly 'neighbouring properties', it is evident that the proposal will have some impact upon the overall Great Osmond Street Hospital site, especially for those windows directly facing the proposal (which are south-east facing and would be in close proximity) and for any amenity areas north in reasonable proximity of the proposal. Should sunlight be considered important to any of these areas, sunlight analysis review should be submitted. Equally, it is noted that there are photovoltaic (PV) panels on the southern roof pitch to the building immediately behind the proposal. We assume that either review or suitable alternative PV proposals have been considered but the applicant to advise if this is not the case.

4.0 NEW DEVELOPMENT - PROVISON OF DAYLIGHT & SUNLIGHT

4.1 The provision of daylight and sunlight within the proposed development has not been reviewed. Ordinarily, hospitals could be considered to have a reasonable expectation of daylight and sunlight pending particular rooms uses / facilities. The applicant may wish to submit a statement relating to this. Initial comments are that the availability of daylight and sunlight to windows within the elevation facing Great Ormond Street are anticipated to be reasonable although how that performs within a particular room will be dependent upon many analytical inputting factors such as room and window size and arrangement, glass transmission, reflectivity within the room, etc.

4.2 Perhaps of more concern, pending particular room uses / facilities is the expectation of any reasonable natural daylighting to windows serving rooms in the rear elevation as daylight will be limited for the lower floors (and sunlight effectively not applicable as this elevation is north-west facing / minimal sunlight provision).