

THE LONDON BOROUGH OF SOUTHWARK

**TOWN AND COUNTRY PLANNING ACT 1990
AND ACQUISITION OF LAND ACT 1981**

Revised Inquiry into

**THE LONDON BOROUGH OF SOUTHWARK
(AYLESBURY ESTATE SITES 1B-1C)**

COMPULSORY PURCHASE ORDER 2014

PINS REFERENCE: NPCU/CPO/A5840/74092

**Proof of Evidence of
Peter Raynham
For the Aylesbury Leaseholders Group**

12 December 2017

Introduction

1. I am a Senior Lecturer at the Institute for Environmental Engineering at University College London where I teach on the MSc in Light and Lighting. I have been working in the area of lighting since 1976, with experience in 2 major lighting companies before joining the university in 1976.
2. As someone interested in the area of light and lighting I have become involved in professional associations and a number of industry guides and standards. Perhaps most relevant to this statement is that I chaired the technical panel that wrote the BS8206-2: 2008 Lighting for buildings – Part 2: Code of practice for daylighting. It should be noted that most of the guidance documents published by other bodies such as BRE follow the same principles as BS 8206-2 and have the same recommended thresholds for daylight.
3. I was asked by a colleague who knew of my expertise in this area to review the potential daylight issues associated with the Aylesbury development. Given the time available I have not studied and modelled the detailed structures of the proposed buildings to assess at first hand the daylight quality of the site. I have instead read through the documentation associated with the previous application and compared the analysis of daylight with the analysis provided for the current proposal.
4. This statement references the following documents:
 - **[CD63]** Planning report for the consented FDS scheme dated 23 April 2015

- **[CD50]** Inspector's Report to the Secretary of State for Communities and Local Government by Lesley Coffey 29/01/2016
- **[CD51]** SoS Decision Letter, from National Planning Casework Unit, Department for Communities and Local Government, 16/09/2016
- **[CD78]** WSP Supporting statement (17/AP/3885), October 2017
- **[PR1]** GL Hearn Supporting Addendum (17/AP/3885), October 2017

5. My key finding is that in the previous proposal daylight and sunlight was inadequate in several places on the proposed development and that this problem contributed to the rejection of the scheme. These issues are still a problem in the revised proposal.

6. In the initial proposal's planning report for the consented scheme **[CD63]**, there were a number of sections that discussed daylight availability in various parts of the proposed development. Paragraphs 134 to 139 discuss daylight in dwellings and paragraphs 157 to 162 are about sun light availability in amenity spaces.

7. In paragraph 135 of the planning report **[CD63]** there is a table (table 27) that lists the number of rooms in each block that meet the daylight factor recommendations of BS 8026-2. This table reveals that overall 19% of rooms (484 out of 2529) do not have sufficient day light. In paragraph 137 it mentions that there are some particular problems in some extra care units. These people who may not get out very often have greater need for daylight in particular to ensure they can maintain circadian entrainment.

This is covered in BS 8206-2 section 3.2.1 the critical text is:
“Therefore, it is important that occupants of buildings, particularly those of limited mobility in, for example, hospitals and nursing homes, and people who might be unable to go outside much, are given access to high levels of daylight, particularly in the mornings, to assist the entrainment of circadian rhythms. Therefore, buildings used by such people should have spaces with high levels of daylight, such as conservatories, which are readily accessible to them.” It appears that in this area, the developer had tried to increase the provision of daylight in a limited area accessible to the occupants but this has come at the expense of daylight in other areas of the units.

8. In paragraph 159 of the planning report **[CD63]** it is reported that the solar penetration to the courtyards of blocks 1 and 6 is below that recommended in BRE guidance. In paragraph 161, it is further reported that 26 garden spaces do not achieve the recommended amount of solar penetration. Whilst the BRE guidance on solar penetration is based on a simplistic assessment method, it does provide a good rule of thumb for guidance. The developer could have gone on to do a more detailed assessment of total probable sunlight hours in the areas, however, they chose not to.
9. The planning inspector rejected the previous scheme. In sections 368 to 370 of her report **[CD50]** she discusses the problems with daylight and sunlight in the proposed development. Thus, it is a reasonable inference that the fact that daylight and sunlight provision did not meet the values set out in a range of guidance documents was one of the factors that lead to the decision to

reject the application.

10. The proposal was also considered by the Secretary of State (SOS) who confirmed its rejection. In the SOS letter **[CD51]** rejecting the proposal the issue of poor daylight was also mentioned in section 15. This again suggests that daylight issues contributed to the rejection of the original scheme.
11. In the revised proposal, a supporting statement **[CD78]** addresses the issues of daylight and sunlight. The information is in section 4.3 and its subsections. It is clear that the developer has commissioned a detailed analysis of the proposal and the following sections of this statement address some of the points mentioned in the supporting statement.
12. In section 4.3.1 of the supporting statement **[CD78]** it reviews changes to the proposed development that might impact daylight on the site and comes to the conclusion that the design changes will have no real impact on daylight. This part supporting statement is in fact a summary of Chapter 4 of the Supporting Statement Addendum **[PR1]**.
13. In section 4.3.1 of the supporting statement, it states that as there has been no material change to the shape of the blocks there will be no change to the sun light penetration. Thus all of the potential problems discussed in section 7 of this statement will remain.

14. Also in section 4.3.1, it states that 80% of rooms meet the daylight factor guidance. This implies that 20% (559 of 3347) of rooms do not meet the guidance. As the assessment process appears to have been more rigorous in the revised application and the study also reports that 25% of rooms do not have an adequate view of the sky. This lack of sky view indicates that the back of some rooms will be quite dark. From this information it is hard to say that the daylight conditions have got worse as the more rigorous analysis carried out on the revised proposal may have found some problems that were not discovered in the first analysis. However, it is clear that there has been no real improvement in the availability of daylight and sunlight in the revised proposal.