

Development Plans Team
Environment Department
City of London Corporation
Guildhall
London EC2P 2EJ

By email: PlanningPolicyConsultations@cityoflondon.gov.uk

17 February 2023

Dear Sir/Madam,

Re: Draft Lighting Supplementary Planning Document

I am writing on behalf of the City Property Association (CPA), the membership body for the owners, investors, professional advisors and developers of real estate in the City of London. You can view a list of the 160 member companies we represent [here](#).

The CPA welcomes the opportunity to comment on the City of London Corporation's draft Lighting Supplementary Planning Document ("Lighting SPD") (17/11/22). The CPA is **supportive of the overall objectives of the Lighting SPD**, and its measures, which seek to reduce energy consumption from commercial buildings.

Such measures will help to ensure the City becomes a world class sustainable hub for business and meet the City of London Corporation's commitment to achieving net zero by 2040. With buildings accounting for around 78% of greenhouse gas (GHG) emissions generated in the capital¹ and lighting accounting for 23% of operational emissions in commercial buildings according to the UK Green Building Council, it is clear that the use of light and the energy expended as a result has an essential role to play in decarbonising our commercial buildings and creating a more sustainable city for all. This is a key priority for many of our CPA members who are taking active steps to reduce the carbon footprint of their portfolios.

CPA also welcomes measures within the Lighting SPD which will reduce visual pollution and ensure that lighting in the City is used in a more impactful and energy-efficient way. This includes ensuring unnecessary lights are dimmed or switched off and lighting is time limited or better designed. Such measures can better showcase the City's public realm, unique landmarks, heritage and cultural assets and leisure and hospitality outlets at night-time. As well as making the City a more attractive place to visit after dark, effective but safe and sustainable lighting can help to drive the night-time economy, support the City Corporation's ambitious Destination City initiative and contribute to the overall economic growth of the City.

In this vein, we would recommend that the six Lighting Outcomes in the document should identify supporting economic growth and the night-time economy. This would reflect one of the three aims set out in the City's Lighting Strategy (2018) to "**support a thriving economy**". It would also align

¹ Retrofit First, Not Only: A focus on the retrofit and redevelopment of 20th century commercial buildings, 2022, p10, London Property Alliance

with the Mayor's vision for London to be a 24-Hour City, which is supported by London Plan Policy HC6 (Supporting the night-time economy) which states that boroughs should, where appropriate, promote the night-time economy, particularly in the CAZ and other areas. Such an approach would also support the Destination City initiative and ensure the competitiveness of the Square Mile.

We therefore suggest that an additional Lighting Outcome is added to p3 as follows:

- **"Sustainability and Climate Change;**
- **Support a Thriving Economy;**
- **Residential Amenity;**
- **Public realm;**
- **Architecture, heritage and public art;**
- **Safe and Inclusive Design;**
- **Temporary Lighting"**

In addition, while we are supportive of the objectives behind the 'Considerate Lighting Charter' set out in the Lighting SPD, which is focused on those that own and manage existing buildings in the City, we would encourage the City Corporation to work in partnership with other London boroughs and/or the GLA when developing and initiating this policy to harness expertise, pool resources and avoid a proliferation of different and competing charters across the capital. We are mindful that an additional layer of bureaucracy at such a local level could place an additional burden on businesses.

We would also encourage the City Corporation to review the level of information required in the early stages of the planning application process contained in the document. The planning process has become increasingly complex for planners and developers alike, with applications taking longer than ever to move through the system, deterring investment and slowing down economic growth.

Our detailed review and comments on the draft Lighting SPD have been prepared by Gerald Eve and Equation Lighting and can be found overleaf. Our comments have been informed by a technical review undertaken by Equation Lighting, who have also provided a detailed marked-up version of the Lighting SPD, enclosed at Appendix 2 and attached with this letter, along with a tabulated list of these comments provided at Appendix 1

We would welcome the opportunity to discuss the content of these representations further if helpful.

Yours faithfully,



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Application Requirements

Whilst the CPA agrees with the encouragement of lighting early in the scheme design process, the City of London Corporation must ensure that any SPD which comes forward is fair and reasonable in scope and does not place unnecessary burdens on developers which could slow the planning application process. The Lighting SPD must ensure that any technical matters are presented in a clear, unambiguous manner, which enables decision makers to fully understand the particular nuances which a lighting design scheme can present.

The draft Lighting SPD states in section 3.0 that all major developments should be accompanied by a Lighting Strategy at pre-application stage and a Lighting Strategy and Lighting Concept at application stage, with Technical Lighting Design details provided post-permission via condition. The CPA is concerned that the scope of information required at pre-application and application stages (referenced in Tables 1, 2 and 3) is significantly onerous and has the potential to cause delay to the planning application process and therefore the delivery of needed growth.

We appreciate the encouragement within the draft Lighting SPD that early consideration of lighting in scheme design can help incorporate clever design mechanisms which can, for example, reduce visual light spill and optimise efficient lighting. However, there must be a balance struck between encouraging early consideration of these matters and the commercial practicalities of how schemes are designed, and planning applications are submitted. It is important that technical lighting design is aligned with RIBA architectural design stages, and the Lighting SPD, as drafted, does not fully recognise the RIBA stages and guidance. We ask that the Lighting SPD takes a balanced and flexible approach to this important consideration.

Detailed technical design can only take place after the grant of planning permission, when the principles of a project have been secured and necessary funding obtained to move forward a project. The scope of information referenced in Tables 1, 2 and 3 broadly seems to reflect the RIBA architectural stages, but this is misaligned with the level of information a design team could realistically provide by reference to the RIBA guidance. The approach set out in these tables is too rigid and does not reflect how developers typically appoint and engage their consultant teams through the design process. We consider that the approach set out in Tables 1, 2 and 3 should be re-considered so that it effectively encourages early consideration in scheme principles, but not in a way which would unfairly delay or hinder the planning process or development.

We have set out below our comments on the requirements as follows overleaf:

Table 2: Lighting Strategy Submission Requirements (i.e. Pre-Application Stage)

Requirement	Description	CPA Comment
A. Vision	Illustrated and written description of the high-level creative approach for all external lighting and, where relevant, internal lighting.	<p>Appropriate for pre-application stage for external lighting in principle.</p> <p>Internal lighting is unlikely to be considered at this stage, which is often related to a tenant fit out, often under multiple party ownership. For the interior lighting to be considered at this stage, the architectural design would need to be sufficiently developed and a coordinated response between different scopes/consultants would be required. This is considered unrealistic, and we ask that the City reconsider the guidance in this section.</p>
B. Analysis	Assessment of issues including context, character, safety, security, legibility, accessibility, and sustainability.	At a high level this could be achievable, but there is a risk of design development between this stage and planning application stage which means assessments may have to be re-visited.
C. Approach	Illustrated and written description of the general lighting approach for all external lighting including street and amenity lighting, illuminated signage and media, building and landscape lighting and the illumination of art.	A general approach could be appropriate at pre-application stage but it is highly unlikely that the scheme parameters would be fixed to give a description of all external lighting e.g. signage/art would be unlikely to be considered at this stage. There is therefore considerable risk that any information provided becomes irrelevant and needs to be re-visited at a later stage.
D. Technical	Strategic diagrams showing proposed average levels of illuminance and uniformity requirements, colour temperature, and scale/ heights of fixtures.	<p>This level of detail is highly unlikely to be commissioned at pre-application stage.</p> <p>The architectural design needs to be sufficiently developed for any lighting design criteria to be of relevance. Normally technical</p>

		design is carried out at a later stage and subject to a planning condition to be discharged when sufficient technical details become available.
E. Residential Amenity	Details of the approach to the reduction of any impact created by the internal lighting related to obtrusive light, such as glare, excessive visual brightness, light spill, and light intrusion, detailing potential mitigation measures.	This could be considered at a high level, but it is highly unlikely that any interiors would be designed at pre-application stage. It is also unlikely that any developer would want to set strict specific requirements which may hinder lettings once the scheme had been built out.
F. Environmental Impact	Statements regarding proposed energy use, obtrusive light such as sky glow, glare, excessive visual brightness, light spill, and light nuisance and any potential impacts on local biodiversity should be included along with a commitment to long term maintenance, management, and the reduction in waste, embodied and operational carbon.	This assessment would not be able to be effectively carried out without detailed technical information, which is unlikely to be progressed at pre-application stage.

Table 3: Lighting Concept Submission Requirements (i.e. Planning Application Stage)

Requirement	Description	CPA Comment
A. Concept	Illustrated and written description of the detailed Lighting Concept for all external lighting including street and amenity lighting, illuminated signage and media, building and landscape, lighting and the illumination of art and, where relevant, internal lighting.	<p>Whilst a high-level concept could be appropriate at application stage, this should be high level only and rendered plans, sections, elevations may not be available as this level of detail is often commissioned post-permission, as per the RIBA guidance.</p> <p>Particularly in respect of interior lighting, again, this is highly unlikely to have been developed at planning application stage given that it often relies on tenant fit out and multiple parties/consultants which are</p>

		often appointed post the grant of planning permission.
B. Technical	Modelling of typical areas of public realm showing illuminance levels and uniformity and of any lighting to façades showing luminance levels.	At a high level this could be achievable in some instances where the relevant architectural and landscape information is available. This may not be possible in all instances. Modelling is typically carried out from Stage 3 onwards (usually post the grant of planning permission).

Internal Lighting

The draft Lighting SPD makes clear that the City Corporation expects internal lighting to be managed/minimised and strategies and methods put forward for how to achieve this. The CPA agrees with the driving ambitions set out to reduce energy consumption and to minimise light spill.

However, our concerns here again relate to timing and level of information required at pre-application/application stages. Internal lighting typically would only be commissioned post-permission once tenants have been identified. Developers are unlikely to (a) spend money commissioning detailed internal designs; and (b) want to set specific restrictions which could possibly threaten future lettings. Rather than requiring details of internal lighting at pre-application and application stages, we instead consider that it would be more appropriate to consider how these elements affect the external appearance of the building post-permission, at the pre-occupation stage (with an ability to acknowledge multi-let premises), with planning conditions drafted accordingly.

This is considered to be an appropriate approach given the commercial sensitives and particularly as internal works are typically beyond the control of planning.

Other Technical Points

In preparing these representations, we have been mindful of the industry’s current benchmark for best practice guidance – the Institution of Lighting Professionals (‘ILP’) guidance document GN01 2021- The Reduction of Obtrusive Light and PLG05 - The Brightness of Illuminated Advertisements, 2013.

Many of the points set out in part 5.0 of the Lighting SPD (Technical Requirements) appear to deviate from this guidance and in some instances, would be significantly more restrictive. We outline some examples as follows:

1. Tables 10 to 13 present challenges that seem possibly unachievable in practice and lack clarity, particularly as the proposals deviate from the ILP guidance.

2. Some of the parameters in section 5.0, if understood correctly, seem significantly more restrictive than the current ILP guidance, specifically on proposed district brightness tables and associated light spill from interior lighting and facade media screens. For example, some of the illuminance values expected are akin to those required in rural areas and/or National Parks (according to the ILP guidance).
3. There is a potential conflict between maximum allowable light spill values from building interiors (Table 10, 11) and the allowable light spill from illuminated signage (Table 12) which is significantly greater. This needs to be clarified.

Should the City Corporation consider additional requirements are necessary beyond the ILP guidance, we suggest that further guidance is provided in respect of proposed illuminance and uniformity levels in particular to help remove any ambiguity.

Whilst we appreciate the City Corporation’s intentions for the Lighting SPD is to protect amenity, again, this must be proportionate, reasonable and balanced. It is not considered necessary to place more significant restrictions than the ILP guidance which represents a widely adopted industry standard.

In respect of technical matters, generally the Lighting SPD needs to be presented in a clear unambiguous way with full attribution of all sources of information and methodology. This will help to limit ambiguity.

Appendix 1 – Tabulated List of Detailed Comments Provided by Equation Lighting Consultants Provided on the Marked Up Copy of the Lighting SPD

Number	Page no in Lighting SPD	Relevant section / paragraph in Lighting SPD	CPA Comment
1	P4	Introduction, para 1.8	We suggest that this paragraph acknowledge that this SPD is provided as guidance and in some instances, there may be justification for deviations from the requirements set out within the document.
2	P6	Planning Process, Concept Design/Notes	High level statements are normally included at application stage. The new guidance set out in this Draft SPD suggests bringing these elements forward to pre-application stage.
3	P7	Table 2	Please refer to comments added to CPA Representations document.
4	P8	Table 3	Please refer to comments added to CPA Representations document.
5	P9	Planning Process, B.	The requirement for exterior lighting efficacy is unclear throughout the document. It cites 70lm/ccw but unclear if

		Lighting Equipment Schedule/Description	average installation or minimum for all luminaires. Part L & BREEAM current calls for average, i.e. a more flexible approach.
6	P11	Lighting Guidance, Obtrusive Light 4.7(d.)	The Illustrations accompanying statement 4.7(d) risks being interpreted in a rigid manner and could have unintended implications on lighting design techniques. We suggest the text can expand further: "...where uplighting is deemed necessary within the proposed lighting scheme, the use of precise optics, antiglare treatment and commissioning strategy post-installation should be demonstrated in the details submitted with each planning application".
7	P12	Lighting Guidance, Biodiversity 4.8(d)	Paragraph 4.8(d) seems to divert from the language found within the City of London Lighting Strategy 2018. P24 Section 2.3/Layers of Light. "Landscape Lighting: greater provision of landscape lighting should be considered as part of improvements to the public realm. Considerations should also be given to landscaped areas where darkness should be retained such as parks and churchyards".
8	P18	Technical Requirements, Table 6/Efficiency of the luminaire/Requirement	The requirement for exterior lighting efficacy is unclear throughout the document. It cites 70lm/ccw but unclear if average installation or minimum for all luminaires. Part L & BREEAM current guidance calls for average, i.e. a more flexible approach. Building regulations Part L have different minimum efficacy requirements for different types of specialist lighting.
9	P19	Technical Requirements, Table 7/ Glare/Requirement	ILP guidance states this angle to be 70°. The requirement to reduce further to 45° may affect lower mounted lighting the most, and discourage the use of pedestrian friendly lighting.
10	P19	Technical Requirements, Table 7/Light spill/Requirement	Unclear what is considered amenity lighting.
11	P19	Technical Requirements, Table 7/Energy consumption	Internal lighting scope is frequently split between different consultants, it implies a coordinated response may be required.

		/Requirement	
12	P20	Technical Requirement, Fig 3	No area weighted values provided makes it difficult to compare but if it draws on ILP's parameters, these values correlate to ILP Zone 2 -after curfew value- which it is allocated to rural environments.
13	P21	Technical Requirement, Table 8	New proposed District Brightness Zones are a significant deviation from ILP's environmental zones classification.
14	P22	Technical Requirement, Fig 1.	It is unclear how does the proposed measuring method account for buildings of irregular facade geometry?
15	P22	Technical Requirement, Fig 1.	Clarification needed on rationale of 2m offset. It seems particularly onerous for commercial buildings to comply with this requirement, and it risks hindering activation of areas at Ground Floor level. Current best practice guidance proposes higher threshold values and crucially the measuring plane to be at the receptors' affected surface.
16	P22	Technical Requirement, Fig 2.	Unclear if the measuring plane is 2m wide from site boundary or it starts at 2m offset from site boundary. If the former, it seems particularly onerous for commercial buildings and for illuminated signs of up to 500cd/m2 to comply with.
17	P22	Technical Requirement, Table 10	Category DBZ1 (High District Brightness) is closer to ILP Environmental Zone 3 (Suburban Areas) than it is to Environmental Zone 4 (Urban)
18	P22	Technical Requirement, Table 11	Equal Horizontal and Vertical illuminance values could potentially be set for a clash with the sign luminance values in Table 12.
19	P22	Technical Requirement, Table 10 & 11	Clarify rationale behind the deviation from ILP's environmental zones and feasibility of restricting vertical illuminance values expected of Rural and/or National Parks. We suggest the inclusion of an appendix with methodology can help the understanding and application of these requirements.
20	P23	Technical Requirement, 5.13	1) This requirement has no mention of size of sign/screen which is of concern given that size is a critical factor of perceived brightness. 2) The values of table 12 are more onerous than the current ILP guidance PLG05 however the 'measuring

			<p>plane' suggests an average luminance value is to be taken which would provide a loophole for signs with significant variations in surface luminance i.e. digital media screens.</p> <p>3) There is no mention of daytime conditions and upper luminance values for signs/screens operating during daylight hours.</p>
21	P23	Technical Requirement, Fig 1	Unclear how an illuminated sign to 500cd/m2 (250cd/m2 post curfew) can meet the values required on Table 11 for horizontal luminance on a 2m measuring plane?
22	P23	Technical Requirement, Table 12	Values divert from ILP PLG05. Clarify rationale for deviation and how are values generally expected from rural areas to be met within CoL settings.
23	P24	Technical Requirement, Table 13/Operational times/Requirement	Setting dimming values prior to commissioning of installation seldom reflect the reality of brightness intended as luminaires dimming curves behave differently.
24	P26	Appendix A, Considerate Lighting Charter/Sustainable Lighting 12. Efficiency	Suggest the use of consistent language throughout the document to avoid ambiguity. Clarify if the metric applies as a minimum value for all exterior luminaires or if it relates to the average of the installation as per Part L guidance.
25	P30	Appendix C, Construction Lighting/Recommendations / Lighting curfew limits	Suggest the use of consistent language to remove ambiguity.

Appendix 2 – Marked Up Copy of the Lighting SPD with Detailed Comments Provided by Equation Lighting Consultant

[Attached to this letter]