Environmental Planning
Design & Management

Dominic Wall
Rider Levett Bucknall
2nd Floor,
60 New Broad Street,
London,
EC2M 1JJ

Our reference	10607 Primrose Hill Café
Date	08/02/2019

Dear Dominic,

RE: Primrose Hill Café - Application Ref: 2016/4762/P – Discharge of Condition 6

LUC was appointed in 2016 by Rider Levett Bucknall Ltd. on behalf of The Royal Parks to undertake an Ecological Appraisal (including bat surveys) of the Albert Terrace public toilets at Primrose Hill. LUC was then reappointed in 2018 to update bat surveys and support the above planning application. The surveys recorded that no bats were roosting in the building on any of the surveys. Overall, there were low levels of commuting and foraging activity recorded within and adjacent to the Site during the surveys. Species recorded flying in the vicinity of the site included Soprano Pipistrelle *Pipistrellus pygmaeus* and Common Pipistrelle *Pipistrellus pipistrellus.*

As part of the ecological appraisal and bat survey, recommendations were provided to inform a sensitive lighting scheme design in relation to bats. The application has been given full planning consent subject to planning conditions, including in relation to bats and lighting.

The purpose of this letter is to provide a commentary of the lighting scheme to support the discharge of Condition 6, which is worded as follows:

Prior to commencement of development, full details of a lighting plan or statement shall be submitted to and agreed in writing by the Local Authority. This shall include information about potential light spill on to buildings, trees, lines of vegetation and bat boxes. The lighting plan should demonstrate how it seeks to minimise impact on bats by maintaining dark areas and corridors along boundary features.

Reason: To limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation, in line with paragraph 125 of the National Planning Framework (2012) and in compliance with the Habitats Regulations and the Wildlife & Countryside Act 1981 (as amended).

Ecological Appraisal Lighting Recommendations[1]

The following design measures were recommended as part of the ecological appraisal report to minimise the potential for impacts to bats from lighting:

- Avoidance of lighting wherever possible, particularly in the vicinity of retained trees;
- Use of lighting columns at a height which will not result on light spill to the tree canopy, and strongly directional lighting with cowling, shields and/or hoods to direct lighting downwards and away from any trees;
- Use of LED lighting which does not emit UV (less attractive to flying insects);

[1] LUC (2018). Primrose Hill – New Catering Outlet, Updated Ecological Appraisal 2018. V2; p11 (4.11).

- Use of motion sensor lighting;
- Use of timers to restrict lighting to required periods; and
- Use of the lowest lux possible.

Summary of Lighting Scheme Proposals

The new development will be within the existing building footprint.

'ThorLUX Realta Micro' wall mounted lights are proposed to be positioned on the west, north and south sides of the building. To the west will be 5 lights, 1 to the north and 1 to the south. These lights are 6W LED luminaire controlled via adjacent combined photocell and PIR. The 'Realta Micro' model is directional downward facing, with LED characteristics of 4000°K, these are to be positioned above doorways/fire exits.

Along the east side of the building, there is proposed outdoor seating, with 4 lights positioned above the area. These lights are 'Clearvision Vespa', they are a recessed downlight with curved bezel, 4000°k, with setback LEDs allowing for lower glare. The lights are to be controlled via timeclock and local override switch (Casambi module).

Review of Lighting Scheme Proposals

The determination of whether the lighting proposals seek to minimise impact upon bats, is informed by the BCT's guidance on lighting[2].

The lights positioned externally are all LED lighting, with little to no UV components. The lighting on the north, south and west are to be connected to combined photocell and PIR motion sensors. The lighting in these locations are all downward facing, directional, and non-maintained, meaning that they will have minimal light spill and are only in use when triggered by the motion sensors. The neighbouring hedgerow immediately to the west of the building would also act as a screen to any potential light spill on the surrounding habitat. As a result the neighbouring tree canopies, which provide the most suitable areas of foraging and commuting habitat for bats in the vicinity, are considered unlikely to be subject to any unacceptable light spill due to the downward positioning of the lights and use of motion sensor triggers.

The lights on the east side, located within a proposed outdoor seating area, will be recessed with a curved bezel, reducing any potential light spill into the playground to the east. These lights will be controlled via a timeclock and local override switch, so the lights will not be continuously on. The outdoor seating and where the lights are attached will be covered by a shelter, so the light spill will be contained with a downward, directional manner and not spill onto neighbouring tree canopies.

The proposed lighting scheme has been designed to minimise the potential for lighting impacts on the surrounding habitats, and is considered unlikely to reduce the quality of the existing habitat for supporting bat foraging or movement. Particularly when the proposals are considered in light of the current baseline situation which includes motion triggered security lighting positioned on the buildings exterior. The proposed lighting is downward facing, directional, LED, and will be connected to either motion sensors or controls that allow timing settings and override functions to switch them off when not in use. Therefore minimising light spill onto tree canopies and hedgerows, these being ideal foraging and commuting habitat for bats.

[2] Bat Conservation Trust (2018). Bats and artificial lighting in the UK; Bats and the Built Environment series. *Institute of Lighting Professionals*. Guidance Note 08/18.

In summary, the lighting proposals would not be expected to impact upon bats.

Yours sincerely,

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