

The Lighthouse, Alexandra Ciardi House
[Lighting Assessment](#)

[Prepared for:](#) NHS England

[Date:](#) April 2022

TECHNICAL CONCEPTS

'Light intrusion'

This occurs as a result of light spill falling on to a receptor, generally onto a residential property window (hence the term 'light intrusion') but equally could be any light-sensitive human receptor. It is assessed in terms of the amount of light falling on a surface i.e. illuminance (E) and is measured in lux. Where the receptor is a residential window, the level of illuminance is measured in the vertical plane parallel with the window, to give the vertical illuminance (E_v – lux).

'Glare'

This is the degree of discomfort or disability of a particular light source when viewed against a darker background. It is assessed in terms of the intensity of the light i.e. viewed light source intensity (I) and is measured in candelas (cd). In the context of the lighting assessment for the Approved Development, the luminance of the background against which the intensity will be assessed is defined by means of the relevant ILP Environmental Zone.

'Sky-glow'

This is the diffuse luminance of the night sky. Although there is a naturally occurring glow to the night sky, artificial lighting can potentially dominate the level of 'sky-glow'. This occurs due to direct upward lighting and reflected lighting off ground surfaces, buildings etc. reflecting off gaseous molecules in the atmosphere resulting in luminosity of the night sky. The level of 'sky-glow' will vary depending on prevailing atmospheric conditions, particularly metrological conditions i.e. cloud cover and precipitation. There are various potential means of quantifying 'sky glow'; however, in the case of new exterior lighting installations, 'sky-glow' is addressed by means of limiting the upward lighting ratio (ULR) of the installation i.e. the ratio between useful light downwards and wasted light upwards towards the sky.

ILP Environmental Zone

ILP Guidance Note for the Reduction of Obtrusive Light, 2021 sets out a series of environmental zones for classifying lighting assessment study areas based on their surroundings type e.g. rural, suburban etc., and the lighting environment e.g. low district brightness, medium district brightness etc. Based on the surroundings type and lighting environment, an environmental zone can be selected, from Zone E0 to Zone E4. The obtrusive light limits associated with the relevant environmental zone(s) are then adopted for assessment purposes.

Lighting curfew

A lighting curfew is an agreed time, beyond which, a lighting installation is subject to more stringent environmental control, generally as agreed with the local planning authority (LPA). Such controls may take the form of switching the lighting installation off in its entirety, switching the lighting installation off in part, dimming the lighting installation, or the implementation of smart lighting controls. Irrespective of the adopted control measures, suitable control of obtrusive light for the pre-curfew scenario and the post-curfew scenario can generally be demonstrated by adhering to the ILP Guidance Note for the Reduction of Obtrusive Light, 2021. This national guidance document defines obtrusive light level limits separately for the pre-curfew scenario and the post-curfew scenario. Lighting curfews are generally best suited to facilities where a specific activity requiring artificial lighting ceases at a specific time e.g. a floodlit sports pitch, or a supermarket. However, in many cases, particularly 24-hour operations there is no clear change in activities requiring artificial lighting. In such cases, LPAs seldom impose a lighting curfew per se. However, for the sake of robustness in assessing obtrusive light, it is usual to adopt the ILP post-curfew obtrusive light criteria beyond a certain time. Where this time is not imposed by the LPA, 23:00 hours is generally adopted.

EXECUTIVE SUMMARY

Outline Scope

Strenger Ltd undertook a lighting assessment on a pro bono basis for NHS England for an exterior lighting installation associated with The Lighthouse, Alexandra Ciardi House, Greenland Place, London NW1 0ND (hereon in, 'the Proposed Development'). The Proposed Development comprises of the installation of new signage and a bespoke feature lantern. The assessment is required in order to quantify the impact of artificial light associated with the Proposed Development on its surroundings and has been produced in view of satisfying Camden Borough Council (in the capacity of local planning authority) with regard to lighting impact concerns.

Assessment

In order to assess the potential impacts associated with the lighting installation, the following has been undertaken:

- review of pertinent legislation, policy and guidance;
- review of the site and surrounding area using aerial photography and OS mapping;
- production of a scheme of lighting (Assessed Scheme of Lighting) suitable for environmental assessment;
- detailed 3D computational modelling of the Assessed Scheme of Lighting;
- calculation of 'light intrusion' (vertical illuminance) at residential receptors;
- calculation of 'glare' (viewed source intensity) at residential receptors;
- calculation of 'sky-glow' (upward light ratio);
- comparison of the obtrusive light levels with national guideline values;
- production of light spill contours;
- production of rendered imagery; and
- production of CAD drawings.

Conclusions

Based on the Assessed Scheme of Lighting, it has been demonstrated that the Proposed Development will be compliant with the residential receptor criteria as set out in the Institution of Lighting Professionals (ILP) (2021) Guidance Note for the Reduction of Obtrusive Light. Specifically, the Assessed Scheme of Lighting associated with the Proposed Development is compliant with the post-curfew obtrusive light criteria as set out for ILP Environmental Zone E4. Specifically, the adopted criteria are as follows:

- 'Light intrusion' limit of 5 lux (E_v - vertical illuminance)
- 'Glare' limit of 0.29d cd (I - source intensity)
- 'Sky-glow' limit of 15 % (upward light ratio)

Compliance has been achieved with the adoption of an environmentally sympathetic scheme of lighting having the following integral mitigation measures:

- the design of a bespoke lantern with minimal direct contribution to upward light;
- the design of a bespoke lantern which does not allow for the light sources to be directly viewable from residential receptors;
- the use of luminaires with optimal light distributions for their specific location and orientation;
- optimisation of the lantern mounting height;
- the adoption of the lowest intensity LED modules practicable; and
- minimising the task illuminance level.

1. LEGISLATION, POLICY, GUIDANCE & STANDARDS

Legislation

Clean Neighbourhoods and Environment Act (CNEA), 2005

- 1.1 Light pollution was introduced within the Clean Neighbourhoods and Environment Act 2005 ('CNEA 2005') as a form of statutory nuisance under the Environmental Protection Act 1990 (the 'EPA 1990') which was amended in 2006 to include the following nuisance definition:
- "(fb) artificial light emitted from premises so as to be prejudicial to health or nuisance;"*
- 1.2 Guidance produced in Sections 101 to 103 of the CNEA 2005 by the Department of Environment, Food and Rural Affairs (DEFRA) in April 2006 extends the duty on local authorities to ensure their areas are checked periodically for existing and potential sources of statutory nuisances including nuisances arising from artificial lighting. Local authorities must take reasonable steps to investigate complaints of such nuisances from artificial light. Once satisfied that a statutory nuisance exists or may occur or recur, local authorities must issue an abatement notice (in accordance with section 80(2) of the EPA 1990, requiring that the nuisance cease or be abated within a set timescale.
- 1.3 Although light was described as having the potential to cause statutory nuisance in the CNEA 2005, no prescriptive limits or rules were set for impact assessment purposes. The Guidance Notes for the Reduction of Obtrusive Light produced by the ILP has, therefore, been referred to for the purposes of this assessment.
- 1.4 Guidance produced by DEFRA, Statutory Nuisance from Insects & Artificial Light (2006) on s101 to s103 of the CNEA has also been referred to which places a duty on local authorities to ensure that their areas are checked periodically for existing and potential sources of statutory nuisances - including nuisances arising from artificial lighting. Local authorities must take reasonable steps to investigate complaints of such nuisances from artificial light. Once satisfied that a statutory nuisance exists or may occur or recur, local authorities must issue an abatement notice (in accordance with s80(2) of the EPA 1990), requiring that the nuisance cease or be abated within a set timescale.

National Planning Policy

National Planning Policy Framework (NPPF), 2021

- 1.5 The National Planning Policy Framework (NPPF) states that the purpose of the planning system is to contribute to the achievement of sustainable development and constitute the Government's view on what sustainable development in England means in practice for the planning system. A principal concept contained within the NPPF is the presumption in favour of sustainable development and with regard to artificial lighting, the NPPF states:
- 'Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should:*
- ... (c) limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.'*

International Guidance

Comission Internationale De L'Eclairage 150: Guide on the Limitation of the Effects of Obtrusive Light from Outdoor Lighting Installations, 2017 (CIE-150)

- 1.6 The purpose of CIE-150: Guide on the Limitation of the Effects of Obtrusive Light from Outdoor Lighting Installations, 2017 is to help formulate guidelines for assessing the environmental impacts of outdoor lighting and to give recommended limits for relevant lighting parameters to contain the obtrusive effects of outdoor lighting within tolerable levels. As the obtrusive effects of outdoor lighting are best controlled initially by appropriate design, the guidance given is primarily applicable to new installations; however, some advice is also provided on remedial measures which may be taken for existing installations. This Guide refers to the potentially adverse effects of outdoor lighting on both natural and man-made environments for people in most aspects of daily life, from residents, sightseers, transport users to environmentalists and astronomers.

Comission Internationale De L'Eclairage 126: Guidelines for Minimising Sky Glow, 1997 (CIE-126)

- 1.7 CIE-126: Guidelines for Minimising Sky Glow, 1997 gives general guidance for lighting designers and policy makers on the reduction of sky glow. The report gives recommendations about maximum permissible values for exterior lighting installations. These values are regarded as limiting values. Lighting designers should strive to meet the lowest criteria for the design. Practical implementation of the general guidance is left to national regulations.

National Guidance

Institute of Lighting Professionals (ILP) Guidance Note 01/21: The Reduction of Obtrusive Light, 2021

- 1.8 The ILP has proposed obtrusive lighting guidance and criteria for local authorities with a recommendation that these are incorporated at the local plan level. ILP Guidance Note 01/21 defines various forms of light pollution and describes a series of environmental zones. ILP Guidance Note 01/21 provides suitable criteria against which the effects of artificial lighting can be assessed.

Institute of Lighting Professionals (ILP) PLG 04 - Guidance on Undertaking Environmental Lighting Impact Assessments, 2013

- 1.9 The aim of the Guidance on Undertaking Environmental Lighting Impact Assessments (ILP PLG04:2013) is to outline good practice in lighting design and provide practical guidance on production and assessment of lighting impacts within new developments. The document was produced following the publication of the NPPF in April 2012 and the importance of lighting design being part of a planning application, this document aims to:
- provide an explanation of, and guidance on, the process for producing a lighting assessment;
 - prompt the lighting designer on important aspects of specific projects which should be used to remove or minimise potential environmental problems; and
 - look at the overall processes and evaluation procedures regarding lighting which are considered to be relevant.

2. CRITERIA

Residential

- 2.1 In the absence of statutory guidance, the ILP Guidance Note for the Reduction of Obtrusive Light, 2021 has been used as criteria against which to assess the effects of artificial lighting associated with the Approved Development on residential receptors; this is considered best practice.

ILP Environmental Zone Classification

- 2.2 The ILP has developed an Environmental Zone classification system for the categorisation of areas with regard to suitable obtrusive lighting limits. The Environmental Zone classifications are reproduced in (Table 2.1).

Zone	Surrounding	Lighting Environment	Examples
E0	Protected	Dark (SQM 20.5+)	Astronomical Observable dark skies, UNESCO starlight reserves, IDA dark sky places
E1	Natural	Dark (SQM 20 to 20.5)	Relatively uninhabited rural areas, National Parks, Areas of Outstanding Natural Beauty, IDA buffer zones etc.
E2	Rural	Low district brightness (SQM 15 to 20)	Sparsely inhabited rural areas, village or relatively dark outer suburban locations
E3	Suburban	Medium district brightness	Well inhabited rural and urban settlements, small town centres of suburban locations
E4	Urban	High district brightness	Town/city centres with high levels of night-time activity

ILP Environmental Zone Criteria

- 2.3 For each Environmental Zone, obtrusive light limits for exterior lighting installations have been determined. These are summarised in (Table 2.2 to Table 2.4) below and are intended to support decision makers in establishing whether artificial lighting is detrimental to local amenity or a potential statutory nuisance.

Application Conditions	Environmental Zone				
	E0	E1	E2	E3	E4
Pre-curfew	n/a	2	5	10	25
Post-curfew	n/a	< 0.1 *	1	2	5

* If the installation is for public (road) lighting then this may be up to 1 lux.

Table 2.3: ILP 'Glare' (source intensity) Limits I - cd						
Application Conditions	Luminaire group (projected area A_p in m^2)					
	$0 < A_p \leq 0.002$	$0.002 < A_p \leq 0.01$	$0.01 < A_p \leq 0.03$	$0.03 < A_p \leq 0.13$	$0.13 < A_p \leq 0.50$	$A_p > 0.50$
E0 Pre-curfew	0	0	0	0	0	0
E0 Post-curfew	0	0	0	0	0	0
E1 Pre-curfew	0.29 d	0.63 d	1.3 d	2.5 d	5.1 d	2,500
E1 Post-curfew	0	0	0	0	0	0
E2 Pre-curfew	0.57 d	1.3 d	2.5 d	5.0 d	10 d	7,500
E2 Post-curfew	0.29 d	0.63 d	1.3 d	2.5 d	5.1 d	500
E3 Pre-curfew	0.86 d	1.9 d	3.8 d	7.5 d	15 d	10,000
E3 Post-curfew	0.29 d	0.63 d	1.3 d	2.5 d	5.1 d	1,000
E4 Pre-curfew	1.4 d	3.1 d	6.3 d	13 d	26 d	25,000
E4 Post-curfew	0.29 d	0.63 d	1.3 d	2.5 d	5.1 d	2,500

1) d is the distance between the observer and the 'glare' source in metres

2) Upper limits for each zone shall be taken as those with column $A_p > 0.5$

Table 2.4: ILP 'Sky-glow' (upward light ratio) Limits ULR - %				
Environmental Zone				
E0	E1	E2	E3	E4
0	0	2.5	5	15

Determination of ILP Environmental Zone

2.4

The Proposed Development site and its immediate surroundings are within a 'high' brightness district. This is qualified by the 'sky-brightness' mapping as set out in Appendix A of this report, which indicates the highest 'sky-brightness' band. As the area character is urban and falls within a 'high' brightness district, it is considered that ILP Environmental Zone E4 would be the most appropriate classification for the purposes of this lighting assessment.

ILP Environmental Zone E4 Criteria

2.5 Based on ILP Environmental Zone E4, the obtrusive light limits for the Proposed Development affecting residential receptors are as follows:

- Pre-curfew 'light intrusion' limit of 25 lux (E_v - vertical illuminance)
- Post-curfew 'light intrusion' limit of 5 lux (E_v - vertical illuminance)
- Pre-curfew 'glare' limit # of 1.4d cd (I - source intensity)
- Post-curfew 'glare' limit # of 0.29d cd (I - source intensity)
- 'Sky-glow' limit of 15 % (upward light ratio)

'Glare' limit calculated based on projected area of $0 < A_p \leq 0.002$

Adopted criteria

2.6 In order to demonstrate that it would be possible to operate the lighting for amenity, safe passage and security purposes throughout the entire night-time period, only the post-curfew ILP criteria have been adopted for the purposes of this assessment. As such, the adopted criteria are as follows:

- 'Light intrusion' limit of 5 lux (E_v - vertical illuminance)
- 'Glare' limit of 0.29d cd (I - source intensity)
- 'Sky-glow' limit of 15 % (upward light ratio)

3. RECEPTORS

Residential

- 3.1 Within the context of this assessment, residential receptors are taken as those with the potential to be affected by obtrusive light associated with the Proposed Development. Key existing residential receptors which have the potential to be impacted by obtrusive light from the Proposed Development have been identified and adopted as receptor locations within this assessment. Residential receptors are positioned at local ground level +5.0 m, +8.0m and +12.0m. The assessed residential receptors are set out in Strenger drawing ref: SK-01 Residential Receptor Location Plan.

4. EXTERIOR LIGHTING

Overview

- 4.1 Artificial lighting will be required for amenity, safe passage and security purposes during periods of darkness. The associated potential obtrusive light effects towards surrounding light-sensitive receptors would be minimised through the controlled application of lighting in accordance with current best practice.

Assessed Scheme of Lighting

- 4.2 An indicative outline scheme of lighting (Assessed Scheme of Lighting) has been produced for the Proposed Development. The Assessed Scheme of Lighting does not consider emergency lighting or interior lighting. The Assessed Scheme of Lighting adopts LED luminaires; such technology offers significant energy savings and provide a high degree of optical control, thus minimising obtrusive light. With regard to this assessment, the luminaires - whilst specific, can be considered to be relatively generic; provided that sensible selection of another manufacturer's luminaires is made by a competent Lighting Engineer. The final selection of luminaires and their positioning shall be determined by the Responsible Lighting Engineer in order to meet the Proposed Development site final risk assessed lighting requirements; but bearing in mind any obtrusive lighting impact that the selection may have.
- 4.3 The details of the luminaires used in the Assessed Scheme of Lighting are set out in (Table 4.1) below. The Assessed Scheme of Lighting is set out in Strenger drawing ref: SK-03 Assessed Scheme of Lighting. The associated levels of light spill (MF=1) are set out in Strenger drawing ref: SK-03 REV_A Light Spill. Ingress protection, waterjet and physical impact shall be considered as part of the final lighting design. The drawing details the position, height and type of all assessed lighting.

Reference	No. off	Manufacturer	Details
LUM-A	1	Dialight	Vigilant LED Low Bay L(C,E,F,W)(D,U)-(L,Z)UN-(5,9)9x-xxx-xx
LUM-B	8	LED Linear	Hydralux Hydra W835 HD15 250 IP67



Figure 4.1: Dialight Vigilant LED Low Bay



Figure 4.2: LED Linear Hydralux Hydra

5. MODELLING

- 5.1 Light modelling was undertaken using industry-standard software capable of calculating artificial lighting scenes in exterior scenarios. The software incorporates recognised calculation methodologies and is commonly used for lighting assessment worldwide. An indicative scheme of lighting for the Proposed Development has been produced for the purposes of this assessment and has been inputted into the lighting model.
- 5.2 In order to represent a reasonable worst-case scenario for environmental assessment, the maintenance factor within the lighting model was set to 1.0, such that the scheme was assessed based on the full design lumen output, rather than the maintained minimum design lumen output.
- 5.3 The lighting model adopts a flat ground plane i.e. does not take account of changes in ground height. As such, the lighting model does not take into account significant intervening landform which would provide screening of the light sources. Furthermore, the lighting model does not take account of vegetation and off-site buildings. As such screening has not been accounted for, this can be considered to be a reasonably conservative assessment of obtrusive light.
- 5.4 Such as to provide an illustrative overview of the lighting model, ray-traced imagery of the rendered lighting model is appended to this report in Appendix B. As stated above, the lighting model does not take into account intervening landform, vegetation and off-site buildings. Accordingly, such entities do not feature within the appended imagery.

6. MITIGATION

6.1 The following mitigation measures are integral to good lighting design, and have therefore been included in the Assessed Scheme of Lighting as a matter of course:

- the design of a bespoke lantern with minimal direct contribution to upward light;
- the design of a bespoke lantern which does not allow for the light sources to be directly viewable from residential receptors;
- the use of luminaires with optimal light distributions for their specific location and orientation;
- optimisation of the lantern mounting height;
- the adoption of the lowest intensity LED modules practicable; and
- minimising the task illuminance level.

7. ASSESSMENT

Residential

'Light Intrusion' (vertical illuminance)

- 7.1 The levels of 'light intrusion' from the Assessed Scheme of Lighting associated with the Proposed Development have been predicted at residential receptors. The resultant levels of 'light intrusion' are set out in (Table 7.1) against the ILP post-curfew 'light intrusion' criterion for Environmental Zone E4. Each receptor has been assigned a PASS / FAIL outcome accordingly.

Table 7.1: 'Light Intrusion' Assessment			
Receptor	'Light Intrusion' Criterion - E _v (lux)	Predicted 'Light Intrusion' - E _v (lux)	Outcome
RES-01	5	0.05	PASS
RES-02	5	0.06	PASS
RES-03	5	0.06	PASS

- 7.2 As can be seen from (Table 7.1) above, the predicted levels of 'light intrusion' at residential receptors from the Assessed Scheme of Lighting associated with the Proposed Development are compliant with the ILP post-curfew 'light intrusion' criterion for Environmental Zone E4.

‘Glare’ (viewed source intensity)

7.3 The maximum levels of ‘glare’ from the Assessed Scheme of Lighting associated with the Proposed Development have been predicted at residential receptors. The resultant maximum levels of ‘glare’ are set out in (Table 7.2) against the ILP post-curfew ‘glare’ criterion for Environmental Zone E4. Each receptor has been assigned a PASS / FAIL outcome accordingly.

Table 7.2: ‘Glare’ Assessment			
Receptor	‘Glare Criterion - I (cd)	Predicted Maximum ‘Glare’ - I (cd)	Outcome
RES-01	9 (0.29d)	0	PASS
RES-02	9 (0.29d)	0	PASS
RES-03	9 (0.29d)	0	PASS

7.4 As can be seen from (Table 7.2) above, the predicted maximum levels of ‘glare’ at residential receptors from the Assessed Scheme of Lighting associated with the Proposed Development are compliant with the ILP post-curfew ‘glare’ criterion for Environmental Zone E4.

'Sky-glow' (upward light ratio)

- 7.5 The level of 'sky-glow' from the Assessed Scheme of Lighting associated with the Proposed Development has been predicted. The resultant level of 'sky-glow' is set out in (Table 7.3) against the ILP criterion for Environmental Zone E4. Each receptor has been assigned a PASS / FAIL outcome accordingly.

Table 7.3: 'Sky-glow' Assessment			
Receptor	'Sky-glow' Criterion (ULR %)	Predicted 'Sky-glow' (ULR %)	Outcome
Wider district	15	0.5	PASS

- 7.6 As can be seen from (Table 7.3) above, the predicted level of 'sky-glow' from the Assessed Scheme of Lighting associated with the Proposed Development is compliant with the ILP 'sky-glow' criterion for Environmental Zone E4.

8. CONCLUSIONS

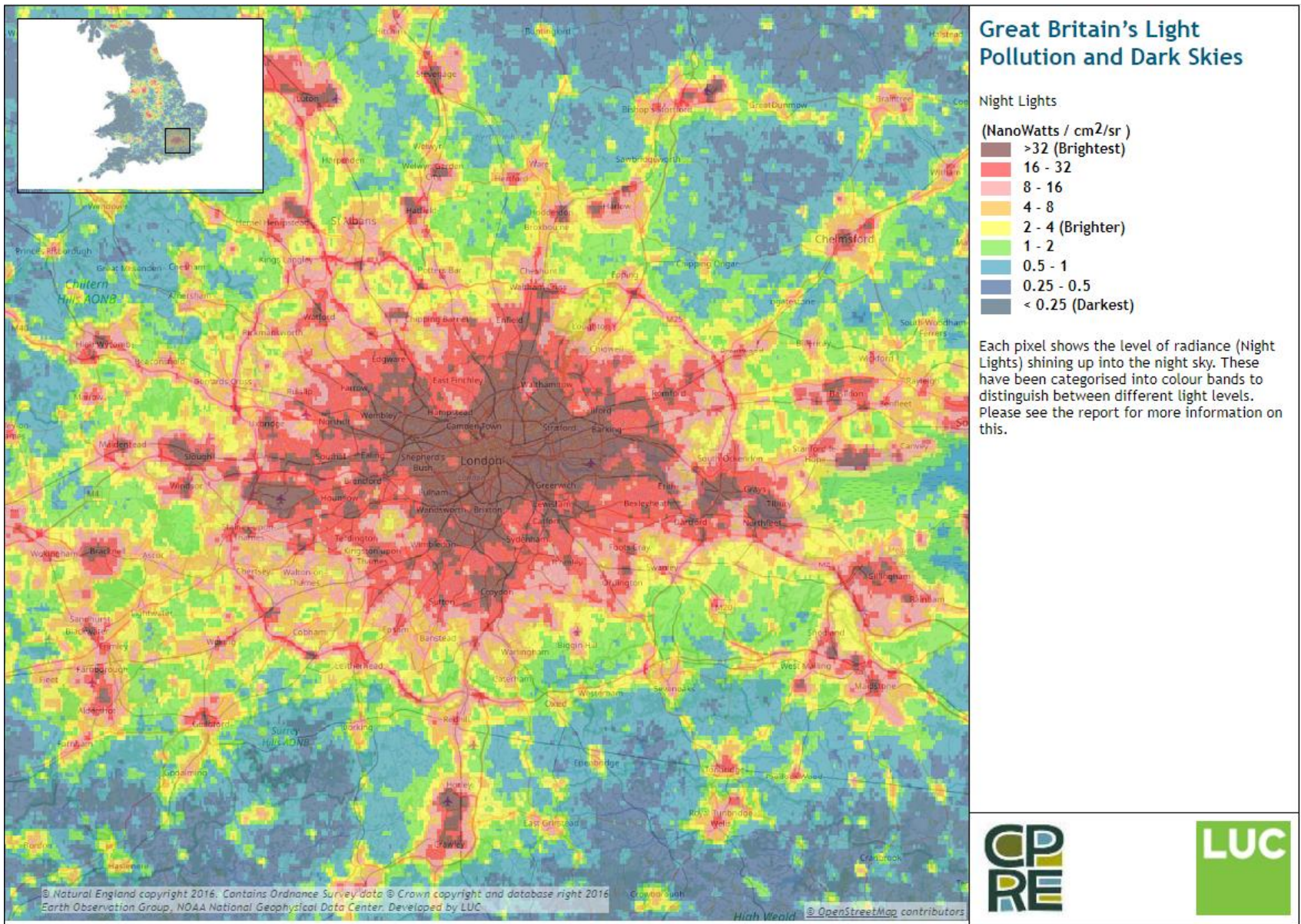
8.1 Based on the Assessed Scheme of Lighting, it has been demonstrated that the Proposed Development will be compliant with the residential receptor criteria as set out in the Institution of Lighting Professionals (ILP) (2021) Guidance Note for the Reduction of Obtrusive Light. Specifically, the Assessed Scheme of Lighting associated with the Proposed Development is compliant with the post-curfew obtrusive light criteria as set out for ILP Environmental Zone E4. Specifically, the adopted criteria are as follows:

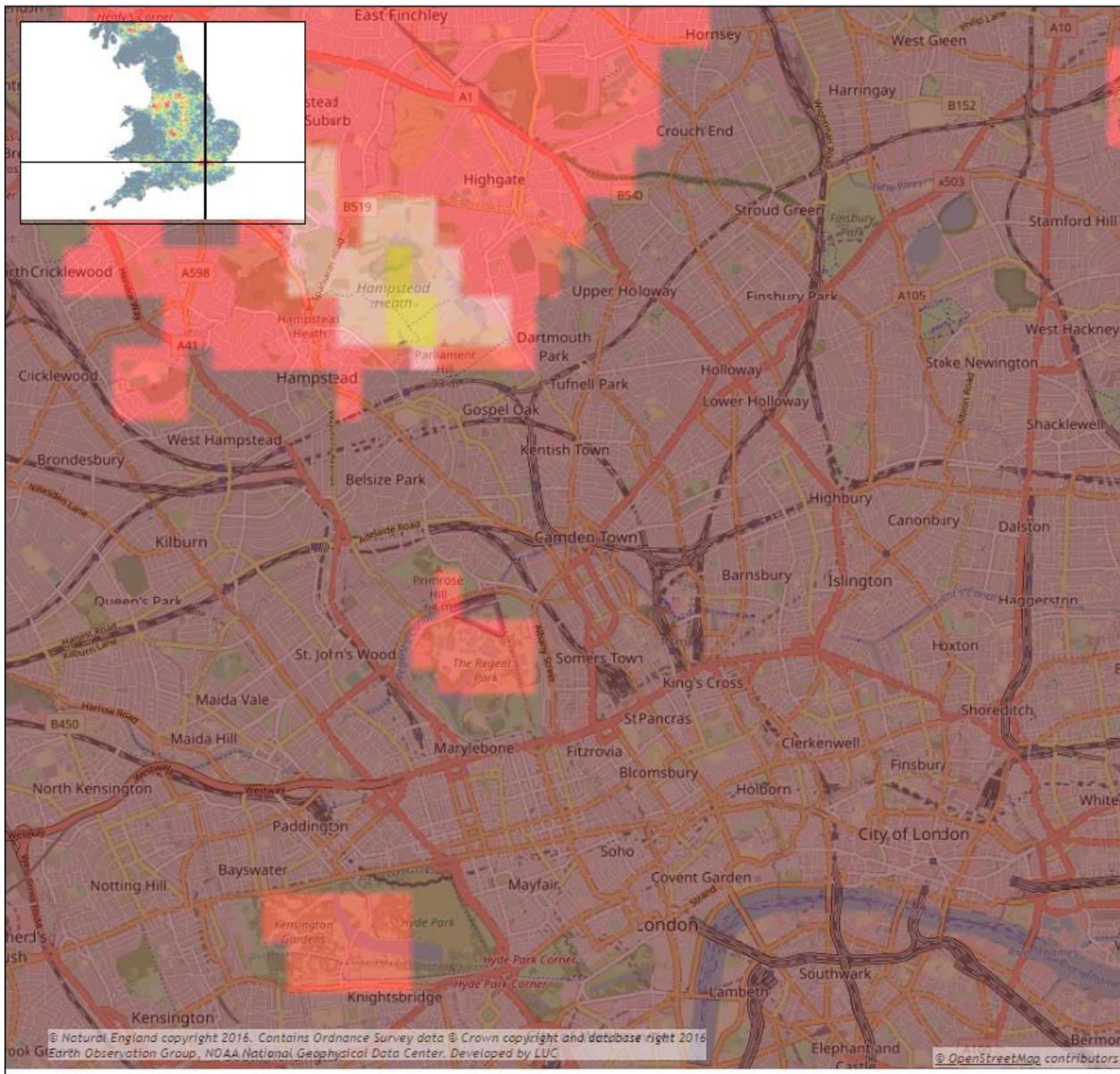
- 'Light intrusion' limit of 5 lux (E_v - vertical illuminance)
- 'Glare' limit of 0.29d cd (I - source intensity)
- 'Sky-glow' limit of 15 % (upward light ratio)

8.2 Compliance has been achieved with the adoption of an environmentally sympathetic scheme of lighting having the following integral mitigation measures:

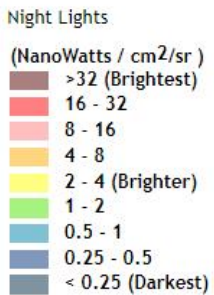
- the design of a bespoke lantern with minimal direct contribution to upward light;
- the design of a bespoke lantern which does not allow for the light sources to be directly viewable from residential receptors;
- the use of luminaires with optimal light distributions for their specific location and orientation;
- optimisation of the lantern mounting height;
- the adoption of the lowest intensity LED modules practicable; and
- minimising the task illuminance level.

Appendix A – CPRE ‘Sky-brightness’ Mapping





Great Britain's Light Pollution and Dark Skies

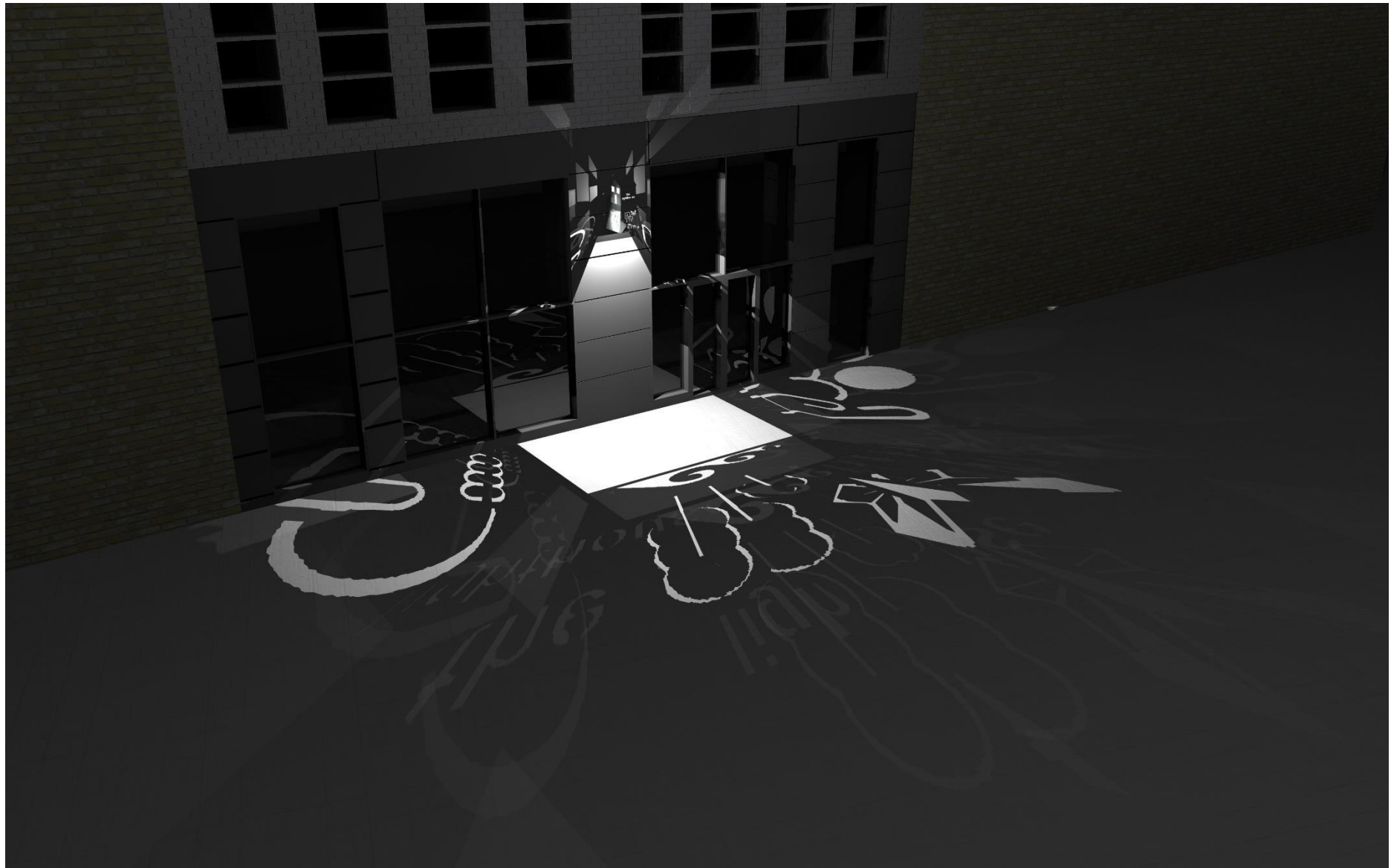


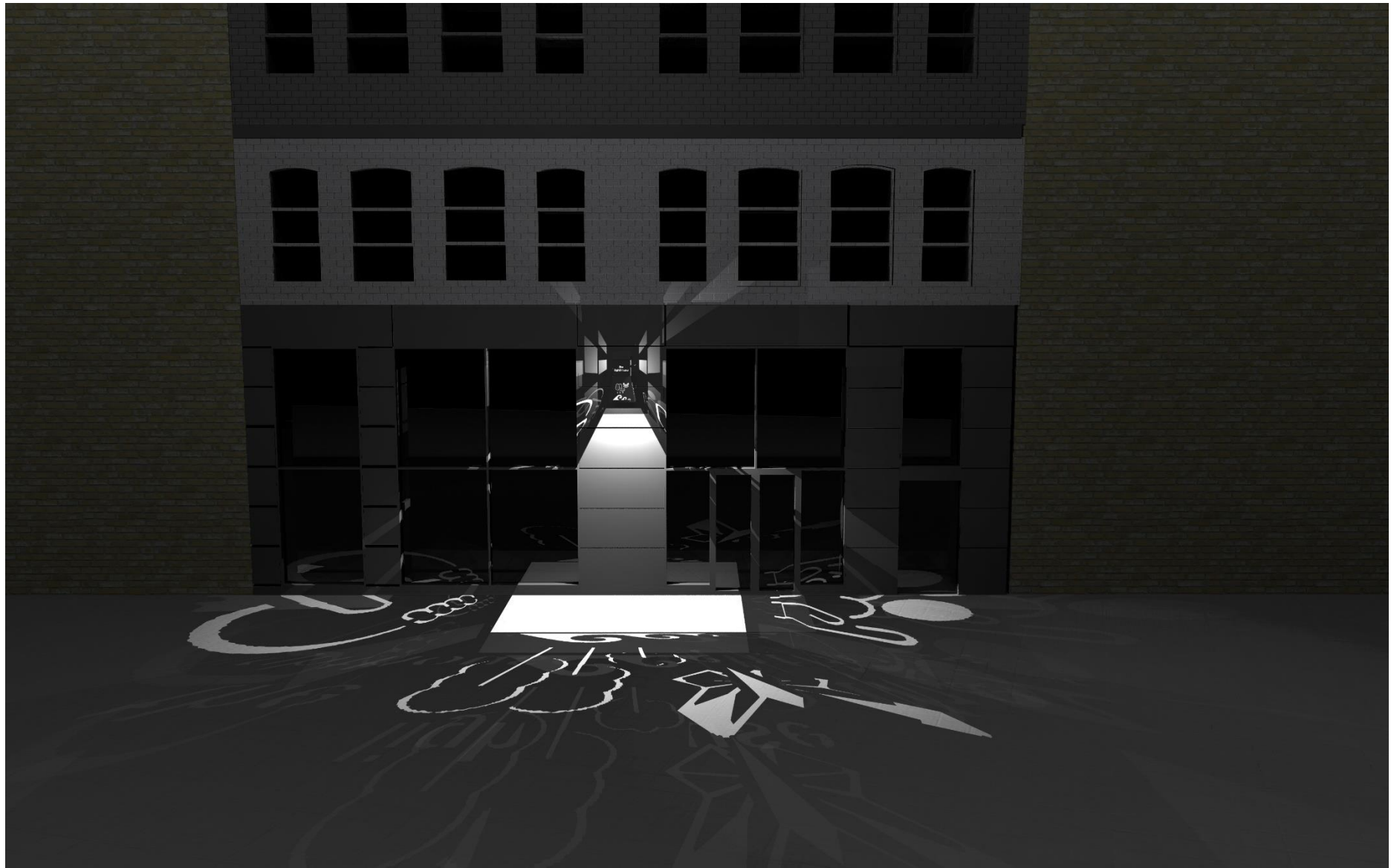
Each pixel shows the level of radiance (Night Lights) shining up into the night sky. These have been categorised into colour bands to distinguish between different light levels. Please see the report for more information on this.

© Natural England copyright 2016. Contains Ordnance Survey data © Crown copyright and database right 2016
 2004 GEarth Observation Group, NOAA National Geophysical Data Center. Developed by LUC
 © OpenStreetMap contributors



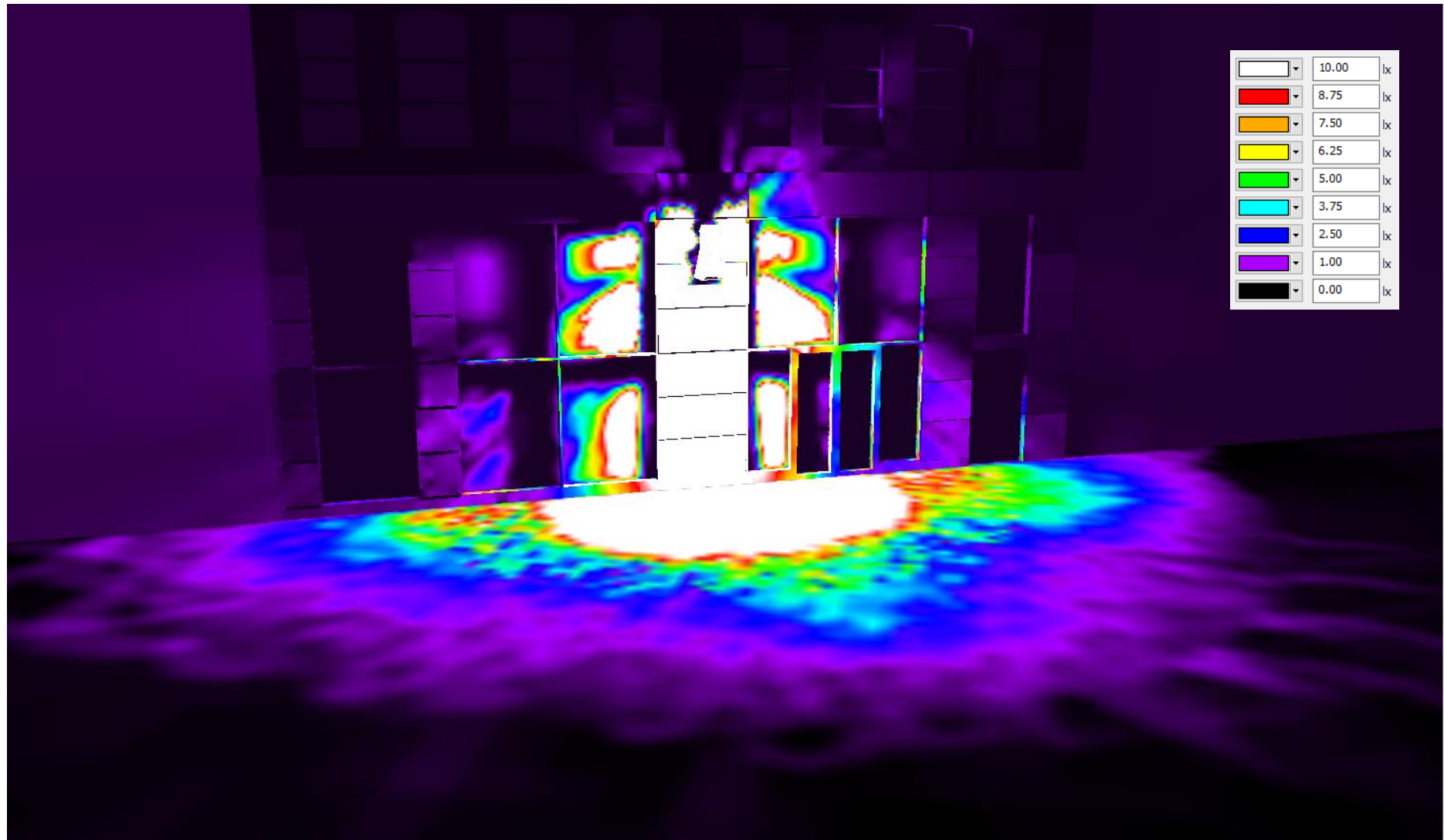
Appendix B - Lighting Model Ray-traced Imagery











Surface illuminance (lux) pseudo colour plot