

<b>Committee(s):</b> Resource Allocation Sub-Committee <b>for discussion</b> Communications and Corporation Affairs Sub-Committee <b>for information</b> Planning and Transportation Committee <b>for information</b>	<b>Dated:</b> 24 January 2024 28 February 2024  5 March 2024
<b>Subject:</b> Considerate Lighting Charter Operational Property Update	<b>Public</b>
<b>Which outcomes in the City Corporation’s Corporate Plan does this proposal aim to impact directly?</b>	1, 2, 5,11,12
<b>Does this proposal require extra revenue and/or capital spending?</b>	<b>No</b>
<b>If so, how much?</b>	<b>N/A</b>
<b>What is the source of Funding?</b>	<b>N/A</b>
<b>Has this Funding Source been agreed with the Chamberlain’s Department?</b>	<b>No</b>
<b>Report of: City Surveyor &amp; Executive Director for Environment</b>	<b>For Discussion</b>
<b>Report author:</b> Graeme Low – Head of Energy and Sustainability Rob McNicol – Assistant Director of Planning Policy and Strategy	

### Summary

The Lighting Supplementary Planning Document ('SPD') was adopted 24 October 2023, and this document includes a Considerate Lighting Charter ('Charter') which the City Corporation encourages those involved in lighting in the City, particularly the owners, managers and occupiers of existing buildings, to commit to.

The Charter is a voluntary commitment and includes nine actions for existing buildings to commit to ensure achieving the right light, in the right place at the right time in the City, and this includes turning lights off when not in use, particularly in internal commercial spaces outside of operational hours.

This paper includes a background to the Charter, implications for the relevant identified City buildings including a summary of potential costs, and a draft programme for interventions.

This paper seeks to inform Members of the likely steps needed for implementing the Charter in identified City of London Corporation operational buildings and the implications of the Charter to 'lead by example'.

### Recommendations

The Resource Allocation Sub Committee is asked to:

- Note the anticipated steps outlined in Appendix 3 for implementing the Charter for the relevant City of London Corporation operational buildings.

- Note the further work needed to confirm the full implications relating to the adoption of the Charter.
- Note the commitment to the production of a further paper setting out in more detail any funding request to initiate surveys and determine an accurate capital cost to implementation (aiming for Q1 24/25).
- Note the intention to continue to promote the Considerate Lighting Charter via existing channels to encourage adoption and sign up while the work to achieve compliance by the City Corporation is ongoing, and the intention to explore with stakeholders any potential barriers that are preventing them from signing up to the Charter; and the potential for future consideration of a wider publicity campaign.

## **Background**

1. In October 2023, the City of London Lighting Supplementary Planning Document (SPD) was adopted following approval by the Planning and Transportation Committee.
2. The Lighting SPD provides guidance for developers on lighting buildings and the spaces between them. It will help developers to meet the requirements of the Development Plan policies that relate to lighting. It covers the design, delivery, operation, and maintenance of artificial light within the City of London.
3. As part of the adopted SPD, a 'Considerate Lighting Charter' has also been included (appendix 1). The Charter gives an opportunity for building owners, managers and occupiers to make a strong commitment to manage their lighting systems in ways that make a positive contribution to the City of London.
4. For existing buildings where no new development is proposed, the City Corporation has no legal powers to enforce adherence with the Charter. Building owners, managers and occupiers would, however, incur reputational damage if they were to sign up to the Charter but not adhere to the commitments it contains. The Charter does not change, or in any way undermine, the City's Environmental Health function, which will continue to investigate complaints of intrusive light and take enforcement action where necessary.
5. The Charter includes nine commitments, both short and longer term, for existing building occupiers to 'achieve the right light, in the right place at the right time'. This is organised into three categories: 'Manage lighting well'; 'Review our lighting system'; and 'Minimise the impacts of our lighting'. The first action is to ensure lights are turned off when not in use including internal commercial spaces outside of operational hours, and for external lighting, which is required to be on, to comply with curfew times within the Lighting SPD. Curfew times range from 10pm to midnight depending on the area.

6. Signing up to the Charter is a good faith commitment to undertake a range of actions. It is not expected that signatories would have completed actions upon signing up to the Charter but signatories would be expected to regularly monitor and publish their progress against the actions they have committed to.
7. In January 2020, the City of London Corporation set out on a fast-paced, cross-City Corporation journey to develop an ambitious Climate Action Strategy (CAS). The Considerate Lighting Charter broadly aligns with the aims of the CAS and provides additional strategic support.

### **Current Position**

8. The consultation has been completed and a final version of the SPD was prepared and approved at the Planning and Transportation Committee on the 18 July 2023. A final version of the Considerate Lighting Charter has also been produced and was submitted for final approval alongside the SPD at the Planning and Transportation Committee in July 2023.
9. This report details the implications of the Charter on the Operational Portfolio, sets out recommended course of actions to reach compliance with estimated costs and associated timeframes.
10. Officers in the City Surveyor's department and the Environment department have reviewed the required options to calculate costs, savings, and paybacks. These calculations have used industry standard benchmark data (CIBSE Guide F) for lighting energy consumption in buildings and have been applied to provide best and likely costs for lighting upgrades. Estimated costs for specialist consultants to investigate areas such as biodiversity impacts, nighttime glare etc. have been included, which will be refined following the conclusion of site surveys.
11. Details of the actions needed to implement, and the implications of the Charter are highlighted in appendices 2 & 3. Whilst the information here is subject to change, it has been based upon an initial high level desktop appraisal of the Charter, utilising recognised benchmarks for cost and energy savings.
12. The programme to compliance with the Charter is highlighted within appendix 4 and suggest that compliance will be reached within the reasonable period suggested. Beginning in Q1 24/25 and completing in Q4 27/28.
13. The summary of potential costs and savings are highlighted in appendix 5, and range between £8.5m - £13.2m capital. These numbers are estimates at this stage, they could be revised downwards following surveys determining accurately what is needed in terms of investment. It is anticipated that any capital investment required could be largely covered by Climate Action Strategy (CAS) funding and Cyclical Works Programme (CWP) backlog funding but this is subject to confirmation following further survey work.

14. Removing buildings that are likely to be disposed, or developed, by 2028 reduces this capital range to £7m and £11m.
15. A high-level review of the CWP lighting projects that have capital committed and waiting to be drawn down and are due to be completed before 2027 identified a further reduction of £4.3m can be removed which reduces the range further to £2.7m and £6.7m capital.
16. A review of CAS lighting projects that have capital committed and waiting to be drawn down for completion before 2027 identified a further reduction of £2.3m to be removed which reduces the range further to £0.4m and £4.4m capital, prior to survey reports confirming the likely cost.
17. Following the initial review of relevant City of London Corporation buildings, the following are in scope for this paper are<sup>1</sup>:

Mayor's Court	Artizan Street Library and Comm.Centre
Central Criminal Court	Barbican Arts Centre
CoL Magistrates Court	Bishopsgate Police Station
Barbican Estate Office	Mansion House
21 New Street	Roman Bath House
Guildhall Complex	Portsoken Community & Health Centre
Walbrook Wharf	Portsoken Pavilion
Temple Bar & Paternoster Lodge	City Information Centre, St Paul's
The Monument	

### Next Steps

18. The next step is to collate a specification for lighting surveys to be undertaken at these sites, to determine compliance. In conjunction with the Chamberlain, the budget to undertake the work over and above CAS and CWP will be required (paragraph 20). Surveys will be required to identify biodiversity impacts and mitigation measures, levels of light spill, control and colour temperature of existing lighting, and costs associated with any interventions required to comply with the Charter. Officers plan to return to Committee to seek approval for future stages in Q1 2024.
19. Ultimately, responsibility for delivering the programme within their building will sit with the site owner or premise controller with City Surveyors facilitating these conversations.

### Promoting the Lighting Charter

20. The Policy and Resources Committee received a report in July 2023 setting out a proposal to undertake an extensive and targeted promotional campaign for the Considerate Lighting Charter, with funding from the Policy Initiatives Fund. This was, however, withdrawn as it was considered that the Charter had received sufficient interest in the property sector and through press coverage. There are also concerns that promoting the Charter without the City

<sup>1</sup> Excluded buildings are investment group properties, warehouses, schools, residential, open spaces, theatres, markets, sold buildings, out of Square Mile, public toilets, car parks, street lighting.

Corporation signing up to it could prevent any campaign from reaching its full potential without the Corporation's clear leadership on this issue. Since this time, the City Corporation's Planning Division have continued to promote the Charter through their liaison with property groups such as the City Property Association and the City's Business Improvement Districts, although to date there have been no signatories to the Charter. Adoption of the Charter by the City Corporation for its operational property is a crucial step to demonstrate to other property owners that the requirements of the Charter are ambitious but achievable.

21. Once the timeline for the City Corporation to sign up to the Charter for its operational property is agreed, the Environment Department will seek to establish from relevant stakeholders including building managers, occupiers and businesses some further insight into potential barriers that are preventing them from signing up to the Charter. Subject to understanding what actions could support increased sign up and what policy or operational barriers may need to be addressed to enable businesses to support this initiative, Corporation Communications & External Affairs will consider submitting a paper to the Policy and Initiatives Fund, with the aim to fund a strategic communications campaign to help drive increased sign up and promotion of the City of London's leading role in this area.

### **Corporate and Strategic Implications**

22. **Strategic implications:** The Lighting SPD and Considerate Lighting Charter is in line with the aims and objectives of the 'environmental, targeted action and working with others' elements of the emerging City of London Corporate Plan and People Strategy 2024-29. This SPD will support the delivery of the current 2018-2023 Corporate Plan by ensuring that land-use decisions fully incorporate measures to ensure people feel, and are, safe, people enjoy good health and wellbeing, our spaces are secure, resilient, and well-maintained through the planning system (Corporate Plan, Outcomes 1, 2, 5, 11 and 12).
23. **Financial implications:** The Considerate Lighting Charter includes recommendations, many of which constitute best practice for lighting. This will have an individual impact on future projects, for which these recommendations will serve as guidance. In many cases, the recommendations will result in a lower operational cost. There are no commitments to fund works as part of adopting the Considerate Lighting Charter.
24. **Resource implication:** The resource required to understand lack of take up of the charter will be covered by existing roles. Specialist survey work will require additional outsourced resource which will be managed with existing internal resource. However, these are limited resources and as a result, this presents a risk to the timely introduction of the Charter.
25. **Equalities implications:** The Lighting SPD, including the lighting charter, has been subject to an equality screening exercise, which concluded that it would not have any negative impacts on those who share a protected characteristic. Any decisions regarding the approach to lighting on City Corporation's

Operational Buildings will be subject to the City Corporation's Public Sector Equality Duty 2010 and appropriate equality impact assessment where necessary.

26. **Climate implications:** The Lighting SPD and Considerate Lighting Charter will complement the City Corporation's Climate Action Strategy.
27. **Legal implications:** The Lighting SPD has been developed in line with the statutory requirements of the Town and Country Planning (Local Planning) (England) Regulations 2012.
28. **Risk implications:** Failure to implement the Considerate Lighting Charter within the City Corporation's Operational Buildings will risk reputational damage and likely consequence that other organisations fail to adopt the Considerate Lighting Charter across the square mile.
29. **Security implications:** There are no security implications arising from this report. Additional lighting as part of security measures is considered carefully before being implemented, any reduction in external lighting must not compromise safety and security.

## Conclusion

30. This paper seeks to inform Members of the likely steps needed for implementing the Charter in identified City of London Corporation operational buildings and to the initial implications of the Charter to 'lead by example'.
31. City Surveyors will produce a paper and collaborate with other City of London Corporation departments to produce a future paper planned by Q1 24/25 requesting funding for the commissioned surveys and to implement any no cost measures as soon as possible. An update will be prepared for information for the Planning and Transportation Committee for the separate promotional activities for the Charter in due course.

## Appendices

- **Appendix 1** of this paper includes the adopted Charter within the Lighting SPD.
- **Appendix 2 and 3** includes the Charter requirements, impact, solutions, and implications.
- **Appendix 4** details a draft programme for works to relevant City buildings.
- **Appendix 5** outlines estimated costs for the identified works.

## Report author

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