

Committee(s): Port Health and Environmental Services Committee	Date(s): 11 March 2014	
Subject: Light Pollution in the City of London		Public
Report of: Town Clerk		For Decision
<u>SUMMARY</u>		
<p>Members will be aware that the issue of light pollution from office buildings has been raised by a number of city residents.</p> <p>This report aims to explain the legal position of the City of London Corporation with respect to taking action on this issue. Current and historic attempts to manage this problem are discussed and a suggestion with respect to raising awareness of this issue amongst commercial property owners is made.</p> <p>It is recommended that members</p> <ul style="list-style-type: none"> • Note the information contained in this report • Decide on whether further action is required 		

Background

1. Over the last decade, at meetings, in e-mails and in letters, a number of City residents have raised the issue of light pollution with both officers and members .
2. A common complaint has been that lights in commercial buildings are being left on throughout the night and shining directly into residents' flats.
3. The residents directly affected, and some others, have not just focussed on the inconvenience this causes them but have commented on the perceived waste of energy and associated carbon emissions.

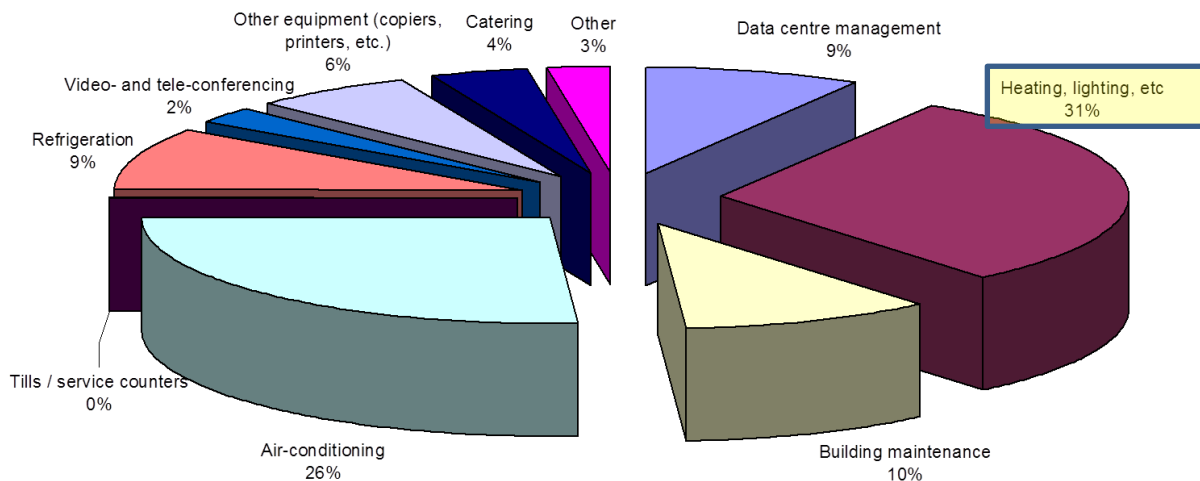
Light Pollution as statutory Nuisance- our powers to act.

4. In acting on complaints made by residents with respect to light pollution, whilst the Clean Neighbourhoods and Environment Act 2005 gives limited scope to allow the City to deal with some issues relating to light pollution, our enforcement powers are restricted to external lighting only.
5. Whilst residents affected could, in extreme cases, take civil action against the commercial property owners concerned, such action would be costly and likely to meet with very limited success- nuisance is difficult to prove, and the remedy- thicker curtains- is simple to apply.

Light Pollution as an Environmental Issue

6. In January 2009, the City of London Corporation published a report detailing the Carbon Footprint of the Square Mile. This determined that the City produces approximately 1.7 Million Tonnes of CO₂ per annum (excluding transport). Residents are only responsible for approximately 21,000 tonnes of this, or around 1.2% of the total emissions.
7. With respect to commercial emissions, figure 1 (below) shows that whilst lighting makes up less than a third of total energy used in the City's commercial buildings, this is still several hundred thousand tonnes of carbon per year.

Figure 1 Typical Energy Split in a City of London Commercial Building



Source: 2009 survey of approximately 1400 City Businesses

Action to Reduce Emissions

8. The City of London Corporation, encouraged by our constituents in the legal and insurance communities have been pro-active in tackling both the causes and effects of climate change. Over the years we have engaged both businesses and resident in programmes of activity to reduce or offset carbon emissions.
9. This has included-
 - Engagement with the financial services community, notably our support and encouragement of the carbon markets which has established the City as the global centre for carbon finance
 - Climate change adaptation, where we were the first UK local authority to develop a comprehensive climate change adaptation

strategy which details how we intend to minimise climate change risks to our services and infrastructure

- Energy efficiency, in addition to supporting one of London's most advanced CHP stations, in the mid 1990's we became the first large organisation to actively purchase renewable energy, whilst this is no longer an active programme, an extensive programme of energy management has substantially reduced the City Of London Corporation's carbon emissions.
 - Programmes to engage businesses and residents in reducing their environmental impacts, such as the City Climate Pledge (2008) Middlesex Green (2010) The Golden Lane Project (2011), as well as residents meetings and business "green days"
10. With respect to the lighting of landmark buildings, members will be aware that in recent years a major project has been undertaken to enhance the lighting of bridges and iconic structures such as St Paul's Cathedral. This has involved the replacement of traditional flood lighting with energy efficient LED lighting which enhances key architectural features.
 11. Whilst every effort is being made to reduce night time lighting at the Guildhall complex, the use of the Guildhall as an events venue limits what can be done. None the less the Energy Manager has been highly successful in reducing un-necessary energy use.
 12. However, despite our on-going efforts within the field of energy management, there has been no significant engagement with commercial property owners and occupiers on energy efficiency issues for several years, aside from annual engagement with WWF's "*Lights out London Campaign*" <http://earthhour.wwf.org.uk/> .

Barriers to Action on Light Pollution

13. In principle, the owners and occupiers of commercial buildings should be amenable to suggestions as to how they can reduce their energy use. As members are aware energy prices have risen considerably in the last few years, and major energy users face the additional burden of the CRC tax, which currently costs the City of London Corporation alone, £500,000 per annum.
14. In practice however, the reasons that commercial property owners and occupiers keep their building illuminated at night are complex and varied. Many businesses run 24 hour trading floors, or in the case of law firms, who by and large are very receptive to environmental issues, they have very late working hours. In other instances where buildings appear unoccupied there is a genuine need to keep lights on at night, because of security, or the need to keep stairwells lit.

- 15 Informal conversation with property developers and owners also reveals that there is low awareness of the issue of light pollution.
- 16 Even where building owners are willing to engage, the problem has proven difficult to solve in isolation, particularly in multi-let offices with a large number of agents taking part-responsibility for facilities management.

Conclusion

Whilst, light pollution is a recurrent theme within the City, the reality is that those who live in a twenty four hour metropolis cannot expect dark skies. This having been said, light pollution can be highly disruptive, impacting of sleep-patterns and quality of life.

Whilst the City of London Corporation cannot force building owners and occupiers to be good neighbour, the vast majority would wish to be so. To this end there are a number of options for talking this issue.

A low cost approach could be a letter from the City Property Advisory Team to building owners and occupiers in the neighbourhood of affected residents alerting building owners that there is a problem thus prompting engagement with the issue.

If members wished to be more proactive on the issue and develop a national leadership position, a programme could be developed which included the development of a “*good practice note*” that identifies the issues and what can be done about them through good management systems- Businesses / building owners could even be asked to sign up to a code of practice on lighting and energy use. Naturally, this would require a proper campaign through the various media available to us.

However, the latter approach would entail significant resources which the Sustainable Development Unit’s does not have. To this end, should member wish to pursue this line of enquiry a separate report will be submitted to your committee detailing potential options and their costs.

The City Surveyor and Department of the Built Environment were consulted in the preparation of this report.

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