## **SSE Entreprise Lighting comments**

Page: <u>Chapter 3 Design</u> Section: <u>N/A</u>

With regards the Plan for London the document sets out a vision and is a great basis for ensuring the deveopment of the great city of London. However as lighting professionals myself and my colleagues at SSE Enterprise Lighting have some concerns that lighting has not been considered in enough detail in this plan. The points below demonstrate areas were we feel further discussion would give a greater benefit an ensure that London and Londoners get the world class lighting they deserve.

- The current draft makes no reference to meeting relevant standards, only appropriate lighting. We would recommend that a Plan for London document should guide the user to the relevant standards e.g. BS5489 etc. and make use of professional publication from relevant industry bodies such as the ILP and SLL.
- The document it stands makes no reference to using competent lighting designers. We would recomend that it advises using only trained and competent lighting designers throughout to ensure that the lighting is of the highest quality and minimises any possible negative impact.
- Section 3.1.5 asks for measures to design out crime but makes no reference to the Secured by Design guides that already offer great assistance in this area.
- Section 5.5.7 should make reference to ILP guidance and relevant Standards for sports lighting.
- In its current form the draft offers little to no guidance on offering London and it residents appropriate lighting. The current draft offers lip service to the subject of lighting, without assisting in creating a document that will guide you to the best solutions.
- No mention of safety of the actual lighting equipment is made.
- No mention of ensuring that the lighting meets with the requirements of the London Boroughs individual lighting specifications.
- No mention is made of lighting being considered early within the design process. This is essential as for example landscaping can have a massively negative impact on the quality of the lighting if poorly integrated with a lighting strategy.
- Whilst Section 3.9.7 requires energy efficiency for the external lighting of tall buildings it has not been addressed in the other sections were it is equally if not more important. It is of especially high importance for 3.1.5 and 3.7.10 as they are addressing public lighting and this will be most likely council owned therefore ensuring the costs to the taxpayer is minimal is of paramount importance,

- All lighting should be referenced against sustainability and energy efficiency and as such climate change and carbon reduction commitments.
- No reference has been made to minimising sky glow, light trespass or nuisance lighting.
- Whilst section 3.1.5 states that development should "contribute to a sense of safety" and lighting is an element of this. No mention is made to how this will be achieve or that the lighting itself must be designed in a way as to ensure public safety, e.g. not installed in such a way as to create a hazard.

Without addressing the matters above the document will not assist in delivering high quality lighting to the public of London. To ensure that the document is of the greatest use SSE Enterprise Lighting would be happy to act as a consultant in drafting sections pertaining to lighting.

Best regards,

James Duffin

Lighting Designer