

Nicola Spencer

From: [REDACTED]
Sent: 21 May 2026 09:51
To: Neil Crowther
Subject: A/44/26/PL

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Dear Mr Crowther,

I write to raise a further observation regarding the completeness of the public file for application A/44/26/PL.

This is not an objection to the application. It is a technical observation regarding the information presently available to ADC, and one which appears capable of straightforward resolution by the applicant submitting the relevant missing documents.

The ecology response dated 5 May 2026 appears to address bird and bat box provision. As you are aware, I have already raised the apparent absence of any submitted lighting documentation. This includes the absence of a lighting design strategy for biodiversity, lux contour plan, luminaire specifications, and details of lighting controls, dimming or hours of operation.

In the absence of that information, it is unclear how ADC can be satisfied that the lighting implications of the development have been assessed against ILP/BCT Guidance Note 08/23, issued by the Institution of Lighting Professionals, of which I am a member, and the Bat Conservation Trust. A copy is available at https://linkprotect.cudasvc.com/url?a=https%3a%2f%2ftheilp.org.uk%2fresource%2fgn08-bats-and-artificial-lighting-pdf.html&c=E,1,Uulyw5S6ANGqOyMCcrO892xde5RZ-2sNn-ZFGQyZqYtkiZMt_WrxUN-s3qfxm8n8r8P0r9-A0pwJl43hAi2kmVwq-pDv2Ef20U_SXa-vtq2leoxhThxLZ80,&typo=1

In particular, paragraphs 3.10 to 3.13 of GN08/23 make clear that the effect of lighting on bats is site-specific; that ecological and lighting design advice should be sought at the outset where lighting is being considered; and that there are no generic lux level thresholds which remove the need for site-specific advice. The guidance also states that local authorities have a duty to ensure that impacts upon legally protected species are avoided, and that impacts upon bats are a material consideration in any planning permission.

Put simply, if ADC does not have a lighting plan or lighting design strategy before it, it is difficult to understand how it can presently conclude that the scheme follows the guidance in ILP GN08/23. The issue is not whether lighting impacts are incapable of being resolved. Rather, the concern is that, on the current public file, there does not appear to be sufficient information to demonstrate that they have been assessed.

Please could ADC therefore confirm whether a lighting plan, lux contour plan, luminaire specification, or lighting design strategy for biodiversity has been submitted but not yet published?

If no such document exists, please could ADC confirm whether the applicant will be asked to submit the relevant lighting information before the application is determined, so that the issue can be properly assessed rather than left unresolved or deferred.

Yours sincerely,

Dr Tym Huckin BSc(Hons) FIAP MBCS