

MEMORANDUM



From: Rebecca Pomeroy
Public Protection Service Manager

To: Shawn Fleet
Planning Control Manager

Our Ref:

Your Ref: P/2022/0548

Date: 23-08-22

Town and Country Planning Act 1990

Town and Country Planning (General Development Procedure) Order 1996

Re: P/2022/0548, The Racecourse, Mold Road, Wrexham, LL11 2AH

Erection of freestanding and stand mounted floodlights (and associated work)

Further to receipt of the Technical Note: Response to Flood Light Planning Queries, Project No: 162001248 Date 20-07-22. I make the following comments:

- 1) The technical note discusses the potential impact from light spill on surrounding buildings and whereas it does estimate a reduction on the majority of receptors, with the exception of the halls of residence at Glyndwr University where no reduction is modelled. The report does caveat these assumptions by stating:

... however there is no guarantee to the aiming of the luminaires that are inoperable are consistent with the luminaires operational at the time of survey. This could potentially lead to higher than double spillage in certain locations

- 2) The Institute of Light Professionals has published GN01/21 The Reduction of Obtrusive Light. This guide categorises various locations for assessment purposes (table 2) with the most applicable to the Racecourse area being:

Zone	Surrounding	Lighting Environment	Examples
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

The above table suggests E3 is the most applicable.

For E3 categorisation the following light levels are recommended for the control of obtrusive light (Table 3):

Pre-curfew 10 Lux
Post-curfew 2 Lux

The guide makes the following comment about curfew:

Depending upon application curfew times often commence between 21:00 to 23:00 and may run until 07:00. However, exact curfew hours should be carefully applied to ensure the reduction of obtrusive light is prioritised within the immediate environment and towards sensitive human as well as fauna and flora receptors.

- 3) The technical note models the Lux levels in the vertical plane to be in excess of both the pre and post-curfew recommendations at all of the modelled locations and by a significant margin in two residential cases.
- 4) It is accepted that the proposed new lights will likely result in an improvement (based on modelled uncertainty as discussed in point 1 above). It is also acknowledged that there are no records of complaints of light nuisance from residents living nearby (both in houses and the student halls). However, given the above it cannot be ruled out that the proposals in this planning application have the potential to cause light nuisance.
- 5) The technical note discusses that mitigation will be achieved by:
 - a) Fixing the angles of the LED's to prevent drift during bulb replacement, in effect preventing potentially altering the light spill pattern.
 - b) Reducing the overall time the LEDs will be lit as they will achieve the required brightness in a shorter time frame than the existing bulb system.
- 6) The mitigation would not, however, alter the brightness levels expected at the properties discussed in the technical note, which as has been commented is expected to be in excess of those likely to result in obtrusive light.
- 7) Given the complexities associated with this, I recommend that the opinion of a professional light engineer be sought to advise the Economy and Planning Department on the suitability and potential issues associated with this planning application.

p.p.



Rebecca Pomeroy
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