



CIBSE/ILP EXTERNAL LIGHTING STATEMENT

Full planning application Part-retrospective change of use and conversion of the former offices to five self-contained flats, including internal alterations; formation of a front-to-rear access passage; installation of ramps and security gates; enlargement of the rear lightwell; remedial works to the flat roof; installation and replacement of windows and doors; erection of a Juliet balcony, boundary fencing and railings and gates to the front and rear lightwells; and provision of cycle and refuse storage.

Site	195 Parrock Street, Gravesend, Kent DA12 1EW
Application	Full planning application submitted at the Council's request
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Date	4 August 2026
Document status	Planning lighting screening statement - no external lighting scheme is proposed

EXECUTIVE CONCLUSION

No new external lighting, floodlighting, lighting columns or externally mounted luminaires form part of the full planning application. The basement lightwells are architectural daylight features, not lighting equipment.

The threshold in Gravesham Borough Council's Local List is therefore not engaged. There is no proposed equipment for a lighting layout, beam-orientation schedule, operating-hours assessment or lux-contour plan. The Council is requested to accept this statement for validation purposes and screen out a specialist Lighting Assessment.

1. Purpose and status of this statement

This statement responds to the request for a CIBSE-related Lighting Assessment. It identifies the scope of the full planning application, tests it against the trigger in Gravesham's Local List and explains why a specialist exterior-lighting assessment is not reasonably required where no external lighting is proposed.

No illuminance measurements, photometric calculations, glare assessment, modelling or lux-contour plotting have been undertaken. This is a planning screening and proportionality statement prepared by a Chartered Town Planner; it is not presented as a technical lighting design or as a specialist certification of numerical compliance with CIBSE or Institute of Lighting Professionals guidance.

2. Application and planning context

The site is a listed former bank building subsequently used as offices. The Council has requested a full planning application for its conversion to four self-contained flats and associated works. This statement forms part of that standalone application and assesses the development now proposed.

The development description and document schedule identify basement lightwells, alterations to openings, repair or replacement of windows, ramps, post boxes, cycle and bin storage, gates and railings. Neither the development description nor the submitted report and drawing schedule identifies an external lighting scheme, floodlighting, lighting columns, security lighting or new externally mounted luminaires. The applicant has confirmed that no outside lighting is proposed.

This statement relates solely to the Council-requested full planning application and to the plans and development description submitted with it.

3. Validation and guidance framework

3.1 Gravesham Local List

Gravesham's Local List states that a Lighting Assessment applies where external lighting or floodlighting is provided or made necessary by development in specified sensitive locations, including publicly accessible locations, the vicinity of residential property or listed buildings and sites adjacent to a public highway.

Where that threshold is engaged, the requested information includes the number, type, location, size, height, intensity and beam orientation of equipment; a lux-contour plan for outdoor floodlighting; mitigation equipment; operating hours; wildlife and night-sky effects; and effects on residential or other sensitive receptors. The list refers applicants to CIBSE and Institute of Lighting Professionals guidance and says that the assessment should be prepared by a lighting specialist.

3.2 Meaning of the CIBSE reference

The Local List does not prescribe a separate document formally entitled a 'CIBSE Statement'. CIBSE is identified as a source of technical guidance for the design and assessment of an exterior-lighting scheme. The prior question is therefore whether the application contains, or makes necessary, an external lighting proposal to which that guidance can be applied.

3.3 Proportionality of local information

Planning Practice Guidance requires a local information request for a particular application to be reasonable having regard to the nature and scale of the development and to concern a matter reasonably capable of being material to determination. A specialist assessment should not be commissioned merely because the site is listed, residential or beside a highway; there must first be an external lighting source or scheme requiring assessment.

4. Screening assessment

4.1 Proposed external lighting

No external luminaires, floodlights, lighting columns, bollard lights, illuminated signs or other artificial exterior-lighting equipment are proposed. No external lighting layout or equipment schedule exists because lighting is not part of the application. Existing public-highway lighting and any existing lighting outside the application proposals are not development for which permission is sought.

4.2 Whether lighting is made necessary

The application does not rely on new external lighting as mitigation, as a design feature or as a prerequisite for the acceptability of the conversion. The external access, storage and boundary details shown in the submission do not include new lighting equipment. On the submitted scheme, no external lighting is identified as being made necessary by the development for planning purposes.

4.3 Basement lightwells

The references to front and rear lightwells describe physical openings or recessed areas beside the basement windows. Their function is to admit natural daylight, provide separation from surrounding ground and facilitate the basement window arrangement. The term does not denote an artificial light source, luminaire or floodlighting installation.

4.4 Sensitive surroundings

The listed status of the building, nearby residential occupation and relationship with the public highway would be relevant receptors if an external lighting scheme were proposed. Those sensitivities do not themselves create a lighting impact. In the absence of a proposed source, there is no beam, spill, glare, sky glow, operating period or ecological pathway to assess.

4.5 Technical information

Because the application contains no external lighting scheme:

- there is no number, type, location, size, mounting height, intensity or beam orientation of proposed equipment to schedule;
- there are no proposed hours of external-lighting operation;
- there is no outdoor floodlighting for which lux contours or directional hoods can be specified;
- there is no proposed light spill, glare or upward light to test against environmental-zone limits; and
- there is no artificial-lighting effect on wildlife, residential receptors, heritage significance or appreciation of the night sky to model.

5. Proportionality

A specialist lighting assessment is an evidence-led appraisal of an identified scheme. Requiring photometric modelling for a zero-lighting proposal would require assumptions about equipment that is not proposed and could not inform the determination of the application before the Council.

The proportionate validation position is therefore:

- record expressly that no new external lighting or floodlighting forms part of the application;
- treat the Local List Lighting Assessment trigger as not applicable;
- avoid imposing technical performance claims on a scheme containing no lighting equipment; and
- consider any materially different future external-lighting proposal on its own details, including heritage and obtrusive-light effects where relevant.

6. Conclusion and requested approach

The full planning application proposes no outside lighting. The Gravesham Local List trigger for external lighting or floodlighting is consequently not engaged, and the CIBSE/ILP guidance referenced by the list has no proposed lighting installation to assess.

Gravesham Borough Council is respectfully requested to:

- accept this CIBSE/ILP External Lighting Screening and Proportionality Statement for validation purposes;
- confirm that a specialist Lighting Assessment, equipment schedule and lux-contour plan are not required for the full planning application; and
- if the Council considers external lighting to be made necessary, identify the particular proposed feature and planning effect relied upon so that any further information can be confined to that defined matter.

This conclusion is based on the express position that no external lighting is proposed. It should be revisited if the application is amended to introduce external luminaires, floodlighting or illuminated signage.

References

1. Gravesham Borough Council, [Local List of Validation Requirements](#), Lighting Assessment, pp.13-14.
2. Chartered Institution of Building Services Engineers, [Lighting Factfile 7: Design and assessment of exterior lighting schemes \(2019\)](#).
3. Institution of Lighting Professionals, [Guidance Note GN01: The Reduction of Obtrusive Light \(2021\)](#).
4. Planning Practice Guidance, [Making an application - local information requirements](#).