

Obtrusive Lighting – SPG responses

Respondent	Comment	Recommended Response	Officer Recommended Change
Coal Authority	Having reviewed the document I confirm that we have no specific comments to make at this stage	Comments noted	No change necessary at this point in time.
CLA	We seek clarification on BBNP implementation intent on application of this policy. We note with dismay that at para 1.3 a list is provided with a caveat for extension together with the generic use of the word “building” in Appendix 1. There is significant concern as to the application of this policy in agricultural and rural enterprise situations especially in the defined “core area”. Whilst farmers and land managers do not wish to devalue the dark skies reserve status, there are practical implications of personal health and safety in situations involving plant, machinery and livestock. Appendix 2 point 1 also raises concerns as to the prospect of vindictive behavior on the part of those who may wish to harm or prevent legitimate business activities. Rural communities and business cannot be sacrificed by the lack of illumination for the sake of urban centered star gazers. Full compliance with these requirements will add complexity and cost in all business models regardless of turnover or profitability therefore placing upland farming in particular at a further cost disadvantage.	<p>It is not the intention of this guidance to in any way prejudice the operation of a business or add undue costs to development schemes. The guidance seeks to draw applicant’s attention to the need to ensure schemes are designed to limit potential light pollution.</p> <p>The proposed guidance note sets out that where it can be demonstrated that the lighting is necessary in interest of public safety/proper functioning of a business that this will be taken into due consideration in the determination of the application.</p> <p>The statement of interested parties is designed to ensure that all known issues are considered from the outset. You will note that no one party is given precedence within any such a statement, it is simply a tool of assessment.</p>	No change necessary at this point in time.
Brecon Beacons Park Society	The document is a useful draft SPG which will form the basis for controlling light pollution in the Brecon Beacons National Park. In so doing it (in its final form) will help protect the quality of the night sky of the Brecon Beacons	Comments noted and welcomed	No change necessary at this point in time.

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	National Park and deliver other benefits to the wildlife and people of the park		
Brecon Beacons Park Society	The correct title of the status awarded to the BBNP by the International Dark Sky Association (IDA) is “international Dark Sky Reserve”	All references to be amended accordingly in the interest of clarity	Amend all references to stated ‘International Dark Sky Reserve’
Brecon Beacons Park Society	The term Core Area should be replaced by Core Zone throughout the document	All references to be amended accordingly in the interest of clarity	Amend all references from Core Area to Core Zone throughout document.
Brecon Beacons Park Society	<p>Although, quite correctly, much of the SPG is derived from the BBNP’s Lighting Management Plan (LMP) as submitted to the IDA some points have not been included</p> <p>In particular</p> <ul style="list-style-type: none"> - The zoning within the BB IDSR – Core Zone, Critical Buffer Zone, Buffer Zone (ie the rest of the BBNP), and External Zone (five miles outside the BBNP boundary) have not been explained nor have the different lighting constraints in these different zones, only the ILP E zones are referenced. - The BBNP’s LMP refines the LDP’s zones E0 and E1 and maps them to the IDSR’s zones. This is in line with the ILP Design Guidance which states that the limitations they recommend (ie the E zone limitations on external lights may be supplemented by LPA’s own planning guidance. The ILP recommendation that advice be taken from a professional lighting designer in this activity was also followed (by engaging consultants who are major contributors to the ILP’s own 	Comments are noted. Amendments should be made in the interest of clarity.	<p>Amend 3.2.3 as follows</p> <p>3.2.3 The International Dark Skies Reserve identifies 4 distinct regions within and around the National Park, each of which have different constraints on the levels of permanent illumination allowed as follows</p> <p>Core Zone – It is the aspiration that within this area that there will be no additional permeant illumination as a part of new development within this region.</p> <p>Critical Buffer Zone – It is the aspiration that there will be no lighting projected from the buffer zone into the core zone. Luminaires in the Critical Buffer Zones using lamps greater than 1000 lumens will be expected to be installed as fully shielded.</p> <p>Buffer Zone (remainder of NP area) All new lighting resulting from development within the Buffer zone will be encouraged to be designed and installed to provide lower glare or intensity values, where possible, than that recommended by the institute of Light Professionals for night time Environmental Zones</p> <p>External Zone – (outside the NP park area) The NPA will utilise the contents of this guidance note as supported by the BBNP</p>

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	standards and publications).		International Dark Sky Reserve Lighting Management Plan to provide the basis for discussion with neighboring LPAs on lessening development proposals potential for light pollution. 3.2.4 Of critical importance within this guidance note is the Core Zone. Within this area there is an expectation that there will be no additional permanent illumination installations as a result of new development
Brecon Beacons Park Society	The BBNP's LMP makes 10 statements which are its key aims. They are not fully covered in the draft SPG.	The SPG deals with the detail of implementation of policy 12. It is not per se a document to implement the Dark Skies Lighting Management Plan. This is a stand-alone document for the Authority, which is referenced within the Document. The elements which can be directly controlled through the planning system are covered fully within the text.	No change necessary at this point in time.
Brecon Beacons Park Society	2.1.1 inappropriate <i>or poorly installed</i> lighting equipment	In the interest of clarity the text should be amended as suggested	Amend 2.1.1 to stated inappropriate or poorly installed lighting equipment
Brecon Beacons Park Society	2.2 It is worth mentioning the benefits in terms of cost savings by local authorities, businesses and individual households through not generating unnecessary light, the benefit to the tourism industry of preserving and improving the quality of the night sky, and the importance of reducing the contribution to global warming due to generating the energy needed for unnecessary light.	In the interest of clarity the text should be amended as suggested	2.2.2 amended to state “There are many reasons why obtrusive light should be prevented for example, cost savings by local authorities, businesses and households through not generating unnecessary light; the benefit to the tourism industry through maintaining the National Park’s dark sky; and less carbon emissions from electricity need. However, the prime objective for adequate control in accordance with Local Development Plan Policy is to minimise the problem it creates for human beings, plants and animals

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Brecon Beacons Park Society	3.2.1 outstanding quality of night sky <i>and provide evidence that it is being protected</i>	In the interest of clarity the text should be amended as suggested.	thereby improving amenity and biodiversity” Amend para 3.2.1 as follows The International Dark Skies Reserve status is a prestigious award given to destinations that can prove that they have an outstanding quality of night sky and provide evidence that it is being protected.
Brecon Beacons Park Society	3.2.3 This is an appropriate point in the document to clarify that the IDSR is the whole of the BBNP and that there are various levels of expectation of and constraint on external lighting (refining the broad-brush E0 and E1 constraints) that apply depending on which IDSR Zone the development is located in.	In the interest of clarity the text should be amended as suggested.	3.2.3 The International Dark Skies Reserve identifies 4 distinct regions within and around the National Park, each of which have different constraints on the levels of permanent illumination allowed as follows Core Zone – It is the aspiration that within this area that there will be no additional permanent illumination as a part of new development within this region and that any necessary lighting will not be lit in a manner that increases upward light spill. Critical Buffer Zone – It is the aspiration that there will be no lighting projected from the buffer zone into the core zone. Luminaires in the Critical Buffer Zones using lamps greater than 1000 lumens will be expected to be installed as fully shielded. Buffer Zone (remainder of NP area) All new lighting resulting from development within the Buffer zone will be encouraged to be designed and installed to

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			<p>provide lower glare or intensity values, where possible, than that recommended by the institute of Light Professionals for night time Environmental Zones</p> <p>External Zone – (outside the NP park area) The NPA will utilise the contents of this guidance note as supported by the <i>BBNP International Dark Sky Reserve Lighting Management Plan</i> to provide the basis for discussion with neighboring LPAs on lessening development proposals potential for light pollution.</p> <p>3.2.4 Of importance within this guidance note is the Core Zone. Within this area there is an expectation that there will be no additional permanent illumination installations as a result of new development.</p> <p>3.2.5 For further information please refer to BBNP International Dark Sky Reserve Lighting Management Plan http://darksky.org/assets/Night_Sky_Conservation/BBNPA%20LMP%20complete.pdf</p>
Brecon Beacons Park Society	The statement “Within the core area there should be no permanent illumination installations as part of the new development will not be lit in a manner that increases upward light spill” in 3.2.3	See above	See above
Brecon Beacons Park Society	Page 7 it would be better to replace the diagram with the one (from either the LMP or the IDA Application document (Fig 2.9)) which	In the interest of clarity the map will be amended. After consulting the figure in the LMP it is considered that the NPA	Amend map on page 7 to show delineated core zone and critical buffer zones. Include legend.

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	indicates the boundaries of all the zones of the IDSR not just the Core Zone and the Buffer Zone.	reproduce a similar map clearly delineating the different zones.	
Brecon Beacons Park Society	4.1 This section is very useful for larger development e.g new builds one or more homes. However, clarification is required as to which constraints and elements of the design process (if any) apply to smaller developments. For instance 4.2.1 would apply to new security lighting at an existing property in the Core Zone (ie allowed only if not permanently on, is of an appropriate type, and is properly installed).	We understand that the objectives of the BBPS are to ensure that the recommendations of the LMP are upheld. This SPG is only able to relate those elements which come within the control of the planning system eg, new builds/change of use of land. If somebody wishes to put security lighting on an existing property, this would not require planning permission, and therefore is not subject to the requirements of this SPG. We appreciate the extent to which such lighting could impact on the IDA designation, we are without power to directly control this element. It is therefore suggested that the BBPS works with the Authority to develop a best practice note for information to householders as to what constitutes appropriate lighting.	Future project to develop best practice guidance relating to domestic lighting outside the planning system.
Brecon Beacons Park Society	The Scottish Executive's Guidance Note (sections 7 and 10) states that it does not cover domestic security lighting and refers readers to a DEFRA guide (which no longer seems to exist) For minor developments perhaps the SPG should have an additional Appendix based on the draft "Property Self-Audit Guidelines" in Appendix F of the BBNP LMP or refer to the UK Government's guide on security lighting "Getting Light Right" (https://www.gov.uk/government/publications/getting-light-right)	Please see above, domestic security lighting, does not of itself require planning permission. However it is acknowledged that some applicants may be considering placing outside lighting as part of their scheme and so would therefore benefit from the domestic guide. It would therefore be of benefit to provide the appropriate link.	Amend 4.2.2 as follows elements applicants are advised to consult Appendix 2 of this SPG and/or the Scottish Executive's good practice guidance (2007) Controlling Light Pollution and Reducing Lighting Energy Consumption or for domestic lighting https://www.gov.uk/government/publications/getting-light-right
Brecon	4.1.2 In the interest of precision it should be clarified that "permanent" means permanently lit	In the interest of clarity the text should be	Amend para 4.1.2 to state Within the core

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Beacons Park Society	rather than a non-temporary installation.	amended as suggested.	zone there should be no permanent illumination installations as part of new development (that is permanently lit, rather than permanently sited).
Brecon Beacons Park Society	4.1.3 Regardless of location, in designing	In the interest of clarity the text should be amended as suggested.	Amend 4.1.3 as follows Regardless of location, in designing a lighting
Brecon Beacons Park Society	4.2.3 Where external (<i>not permanently lit</i>) lighting is proposed	Whereas we understand why the BBPS feels that this element should be reinforced, it is for the lighting plan to justify the nature of the exterior lighting, including its degree of permanence.	No change necessary at this time.
Brecon Beacons Park Society	4.3.1 parenthesis relate to the essential steps Further guidance is given at Appendix 1 in Appendices 1 and 2	In the interest of clarity the text should be amended as suggested.	Amend 4.3.1 as follows . Please note the numbers given in parenthesis relate to the steps set out in figure 4.1 above. Further guidance is given at Appendices 1 and 2.
Brecon Beacons Park Society	(3) Why the particular emphasis on Policy 12 b) v) and vii) compared to the other elements of the policy?	The text relates to all seven sensitive receptors set out in Policy 12. This is essentially the purpose of the policy, to control impacts on these receptors. It is therefore considered that the text appropriately reflects the purpose of the policy.	No change necessary at this time.
Brecon Beacons Park Society	(7) It would be good to guide developers to where they can find the recommended lighting values for tasks.	Further guidance on this element from the BBPS would be appreciated	No change necessary at this time.
Brecon Beacons Park Society	(11) This section contains the first reference to the concept of a curfew time when constraints on lighting are tightened. It needs to be explained earlier.	In the interest of clarity the text should be amended as suggested.	Amend 3.2.4 to state The Lighting Management Plan also states that there will be a curfew in place. For the National Park 22:00 has been adopted as ‘exterior light curfew’ As such new development within the Core Zone will be expected to extinguish

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			or reduce the quantity of lighting unless there are previously agreed planning conditions which contain an earlier curfew time.
Brecon Beacons Park Society	Appendix 2 has a confusing title in the context of the SPG. It is adding detail to Lighting Plan section (4.3) so perhaps should be titled something like "Lighting Plan Contents". Appendix 2 also needs rewording to remove the original context of being embedded in the BBNP LMP (e.g. "this LMP should encourage ...).	In the interest of clarity the text should be amended as suggested.	Amend Appendix 2 as follows Appendix 2 Lighting Plan Contents NB this section is taken from the Brecon Beacons National Park Lighting Management Plan. The full text of which can be viewed at http://darksky.org/assets/Night_Sky_Conservation/BBNPA%20LMP%20complete.pdf
Brecon Beacons Park Society	Table 3.1 7. and various other sections of Appendix 2 contain reference numbers but the reference list from Appendix G of the BBNP LMP has not been included in the SPG.	In the interest of clarity the text should be amended as suggested.	Bibliography added to Appendix 2
Director of the Brecon Beacons Observatory at the NPVC - University of South Wales	I am writing in support of the main conclusions of the above document in my role as an officer of the Campaign for Dark Skies and as the Director of the Brecon Beacons Observatory at the NPVC	Comments noted and welcomed	No change necessary at this time.
Director of the Brecon Beacons Observatory at the NPVC - University of South	Although the document does go a long way toward limiting the growth of light pollution in the BBNP it still does not define acceptable limits for lighting in growth areas such a housing or industrial construction. This is a particular area where the BBNP can really make an effective contribution in implementing low power, low wattage and full cut-	Comments noted and welcomed	No change necessary at this time

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Wales	<p>off lighting controls to safeguard the dark sky reserve without impinging on lighting needs of such construction. Leaving it to constructors, DEFRA guidelines or to industrial users has proved generally ineffective in the past as such constructors simply refer to past types of lighting with minimal changes. This consultation provides an opportunity to implement within the planning of such construction, an active policy of reducing the light pollution and power requirements for existing and new buildings</p>		
Director of the Brecon Beacons Observatory at the NPVC - University of South Wales	<p>It is very noticeable from the NPVC how much light pollution a growing town like Brecon is now throwing up into the night sky. Any action that will have a positive impact on limiting the glare from street and industrial lighting will be warmly welcomed by those enjoying the dark sky reserve. In addition, such limitation will also fall within the promised lighting outline of the IDA bid that was accepted in 2013. A definitive move towards lighting control would set a very good environmental precedent and will save not just power generation costs but will provide a beneficial impact on wildlife and increase the enjoyment and potential activities of the BBNP for future generations</p>	<p>The SPG sets out the level of control that is possible within the current planning policy framework. This will be reviewed at the appropriate time as part of the LDP review. Until such a time, comments are noted.</p>	<p>No change necessary at this current time.</p>
NRW	<p>NRW welcomes this SPG, which recognises the problems that insensitive lighting can cause harm to biodiversity (e.g. bats) and advocates sensitive lighting schemes. In addition, we welcome and support the proposed Policy 12: Light Pollution, which gives specific consideration to bats.</p> <p>We recommend that means of avoiding or mitigating the impact on biodiversity should be clarified; e.g. encouragement to locate</p>	<p>Support noted. We recommend that this element be covered through an updated Biodiversity SPG.</p>	<p>To include detail on lighting impacts on Biodiversity in the updated Biodiversity SPG</p>

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	<p>development with significant lighting requirements away from sensitive areas such as hedgerows and woodland, or other landscape features which may act as wildlife corridors. We advise that a section should be included which lists the species likely to be affected by lighting, and the types of development to be located away from habitats supporting these species – or, if such detail is to be contained within another SPG document, there should be cross-reference.</p> <p>We also recommend that a title and a key/ legend are added to the Dark Skies Core Area map on page 7.</p>		
BBNP Agents Group	This guidance seems to be a complex and probably expensive procedure for developers within the countryside core area. Possibly it may be beneficial for the Authority to set up a workshop on this issue to promote its understanding and guide interested parties.	Comments are noted, we will endeavor arrange something suitable for agents if there is sufficient interest.	Place obtrusive lighting on future Agents Meeting Agenda and/or arrange opportunity for training (cost permitting)