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Sent: 27 September 2019 09:35
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Subject: Dark Sky comments

As promised yesterday;

Attached electronic version of the comments from the North Bovey Conservation group Dark Sky team.

Details of Devon Dark Skies event <https://www.naturaldevon.org.uk/devon-dark-skies-day>

Contact details for Jemima Unwin <https://www.ucl.ac.uk/bartlett/environmental-design/dr-jemima-unwin>

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Dr Hazel A Jones

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Comments and suggestions on Dartmoor Local plan (final draft)

North Bovey Conservation Group: Dark Skies team.
Hazel Jones, Laurence Shorthouse, John Weir.

General comments

The document is well-produced and readable. Sections well defined and Policy boxes easy to identify.

Readers should be made aware that this plan is one of a suite of documents which are mutually dependent and which need to have consistency throughout. All supporting documents should be fully referenced and hyperlinked to enable full understanding of the Plan.

We thought that what was stated in the text was not always adequately reflected in the Policies. This is critical to the credibility of the document as a whole. We found it strange that the Policies were not consistent throughout, in that what was declared as a policy in one section was not included in other sections despite being clearly applicable to all.

We felt that the Plan was rather too insular in approach, with few mentions especially in the policies of how the DNPA proposes to interact with adjacent authorities, especially those towns immediately outside the Park boundary, such as Okehampton, Bovey Tracey, Ivybridge and Tavistock. To be fit for purpose, the plan needs to be workable with their Neighbourhood and District Plans which should support of the National Park purposes. The onus is on the neighbouring authorities to contribute to these purposes

Implementation of the Plan requires some resource allocation (human and financial) plus in-house training. A section on this should be included in main body of the Plan

A section on monitoring should be included on the main body of the Plan. Monitoring will likely have implications for policy revision during the life-time of the Plan. There should be a clear strategy for policy revision and consultation in this event.

It is important to consider throughout, the *cumulative* effects of development, especially the lighting impact on dark skies.

As regards Dark Skies:

There needs to be consistency in the terminology for Dark Skies or Dark night-time skies or Dark night skies, or even dark-night skies.

The references to the importance of dark night skies need to be strengthened especially in the Policies. There should be a clear consistent Lighting policy which applies to business, industrial and residential. It is important to consider 'light spill' of which we could find no mention in the document. This should be added in.

Specific comments.

p14 Strategic policy 1.1(2) 'Special qualities' needs to be embedded in the policy not just the heading.

p15 1.1.8 Should include importance for health and wellbeing.

p16 1.1.8 Dark night(-time) skies should be a stand-alone 'special quality'
Final bullet point – add 'learning'

p18 Text should mention benefits of energy efficiency especially relating to Goal 8 in figure 1.2

p19 Strategic policy 1.2 (2) g) add dark night skies. Policies 1 & 2 have to be integrated as Policy 1 will not be effective unless Policy 1.2 is strengthened.

p20 Mention of surrounding conurbations should be included.

p24 The Strategic Policy must be linked to those of authorities outside the Park.
1.6.4 It is important to consider the *cumulative* effects of development, especially the lighting impact on dark skies.

p25 Term 'Special qualities' should be included
Include 'maintain and enhance wildlife habitats and corridors'

p26 1.6.6 bullet point 2 ?????
Policy 1.6. The *cumulative* impact on dark night skies.

p27 Where are the references to internal and external lighting. Major consideration should be given to 'light spill' from large windows/conservatories etc.

p28 1.7 What about amenity effect on **visitors**.
1.7.3 add intrusive lighting/light pollution.
Policy 1.8 add intrusive lighting/light pollution

p29 Impact of night-time lighting on human health

p31 para 2 add term 'special qualities'
Mention cumulative development.

p33 2.2.5 Minimise or eliminate 'light spill' in addition to external lighting restrictions. No development should be allowed that impacts on the Parks dark night skies.

p34 Where are the reference documents for this policy?

p35 2.3.3 should consider within as well as between corridors

p36 2.3.6 Bullet 5 nocturnal and **diurnal** fauna (again!)
2.3.9 protect roost links to the foraging areas.

p38 Should include section of support text for light and dark sky quality.

p40 Strategic policy 2.2 point 2 – excellent 'alone or in combination' should be considered in other policies.

p42 What offsets could you include for lighting?

p44 2.5.3 Add closer towns – Okehampton, Bovey Tracey, Tavistock, Ivybridge.
2.5.5 Add 'light spill' from windows conservatories etc. This is a major contributor to light pollution. (Check controls implemented in new development in Chudleigh)

p45 Policy 2.5. 1. Dark night skies are according to the header separate from tranquillity and therefore should be added here and not be *assumed* to be included.
Add 3.'The requirement on Neighbouring authorities not to impact the 'special qualities' of Dartmoor National park – including dark night skies will be monitored'.

p47 2.6.3 place **and time**

p48 2.6.11 reference and hyperlink to policies map missing (again)
It should be made clear that dark night skies constitute an important part of 'settings'

p52 Policy 2.7 point 1 'and setting'
Point 2ci 'its setting **and special qualities**'

p61 & 63 Developers and Highways should support DNPA policies

p69 A lighting management plan consistent with International Dark skies Association guidelines should be submitted for all developments. <https://www.darksky.org/wp-content/uploads/2018/12/IDSP-Guidelines-2018.pdf>

p78 Text and policy: Add "large scale fenestrations contribute to light pollution by 'light spill' and should be avoided".

p79 shows prime example of probability of light spill.

p84 Policy 3.10: No mention of 'special qualities' should be added

p87 Policy 3.12. Adverse impact on dark skies must be minimised (cf Chudleigh development)

p92 and 95 Requirement for Lighting management/development plan

p96 : Are there any implications of light pollution

p98 Signs should not be lit.

pp 99, 106, 109 Requirement for Lighting impact statement.
Are there implications of late night opening on external lighting and light spill?

p114 Policy 5.6 2b – love it!

p118 Policy 5.8 1b add dark night skies

P119 final bullet point – great.

p125 Policy 6.1 The **developer** must provide an impact statement. The onus is not on the DNPA.

p126 Policy 6.2. Excellent. These points should be included in other policies where relevant for sake of consistency.

p133 Policy 7.2 Clarify 'properly prepared'

p139 Data on map 7.3 eg where is the school? Orientation? Does arrow signify north? All maps when on line should be updated immediately as the information is made available by the OS.

p144 It seems likely that the prison will be closed within the tenure of the Plan. In which case considering the central location within the Park, policies need to be in place for the redevelopment, especially with regard to restrictions on lighting.

p169 Monitoring of night sky quality should be carried out. An annual survey and report should be a requirement. This would include data on the cumulative effects of developments within and adjacent to the Dartmoor National Park.