

National Planning Policy Framework (NPPF) consultation: submission from the Royal Astronomical Society

With more than 3500 members ('Fellows'), the Royal Astronomical Society (RAS) is the leading UK body representing the interests of astronomers, space scientists and geophysicists.

A key concern of our Fellows is light pollution, which since 2005 has been defined as a 'statutory nuisance' and is covered to some extent by existing planning legislation. We therefore welcome the opportunity to contribute to the NPPF consultation and the reshaping of that legislation that will result.

In 2003 the House of Commons Science and Technology Select Committee held an inquiry into light pollution and covered the topic in great detail. In its submission, the Society argued for control of light pollution in order to protect and enhance the view of the night sky across the UK, bringing benefits not only to astronomy but to science education for people of all ages. In this consultation response we once again emphasise that if lighting is not controlled to ensure it is directed downwards, society pays twice, once for the wasted electricity and associated carbon emissions and once for the resulting light pollution.

In its report, the Committee accepted this view and set out further reasons for mitigating light pollution such as the ecological harm to wildlife. MPs agreed specific recommendations for both central and local government in the area of planning guidance, suggesting that local authorities be obliged to include lighting in their local development plans, that light should not normally be emitted above the horizontal and that astronomical observatories should be able to register for special protection. The report recommended that these measures could then be included in Planning Policy Guidance (PPG) statements.

In 2005 the new Planning Policy Statements (PPSs that replaced PPGs) included limited references to light pollution. 'PPS1: Delivering Sustainable Development' indicates that 'development policies should take account of environmental issues such as... light pollution'.

Appendix A of 'PPS23: Planning and Pollution Control' refers to the 'need to limit and where possible, reduce the impact of light pollution'. PPS23 also indicated that a further appendix dedicated to this light pollution would appear but to date this has not been the case, although it was promised in the Government response to the Select Committee report.

In short, the PPS framework remains weak and since its inception has not led to a serious improvement in light pollution. Evidence for this includes satellite images of the UK and surveys carried out by the Campaign for Rural England (CPRE) and the Campaign for Dark Skies (CfDS). Both of these show how the majority of the UK population suffer from a high level of light pollution and simply never enjoy a good view of the night sky above their heads.

Local authorities and local communities should be the key architects of the landscape they inhabit. As the new NPPF proposes a much more localist approach to planning, in that spirit we recommend that communities be empowered to more effectively control light pollution,

given its recognised status as a statutory nuisance, on broader environmental grounds and in order to protect views of the night sky as a key part of our natural heritage.

A shorter and less bureaucratic planning policy document should contain concise guidance on specific issues and we consider it appropriate that light pollution should fall within the proposed Framework.

In drawing up the new guidance, we therefore ask that Department of Communities and Local Government officials include the following points:

- All planning applications likely to include exterior lighting should be assessed for lighting by planning authorities
- When consent is granted for applications with exterior lighting, conditions connected with that lighting should be a standard requirement
- There should be a general presumption that light should not be emitted above the horizontal
- Best practice guidance should include using only the power consumption necessary to do the job, full cut off at zero tilt where possible and encouragement of timer and sensor controls so that lights are only on when needed
- All decorative floodlighting of buildings to require planning consent

References

House of Commons Science and Technology Select Committee: Seventh Report of Session 2002-3

<http://www.publications.parliament.uk/pa/cm200203/cmselect/cmsctech/747/74702.htm>

RAS written evidence for Select Committee report

http://www.ras.org.uk/images/stories/ras_pdfs/Consultations/Light%20Pollution.pdf

RAS oral evidence to Select Committee

http://www.ras.org.uk/images/stories/ras_pdfs/Consultations/Light%20Pollution%20-oral%20evidence.pdf

Government response to Select Committee report

<http://www.parliament.the-stationery-office.co.uk/pa/cm200304/cmselect/cmsctech/127/12704.htm>

Planning Policy Statement 1

<http://www.communities.gov.uk/documents/planningandbuilding/pdf/planningpolicystatement1.pdf>

Planning Policy Statement 23

<http://www.communities.gov.uk/documents/planningandbuilding/pdf/planningpolicystatement23.pdf>

CPRE and CfDS Lighting Nuisance Survey 2009/10

<http://www.cpre.org.uk/filegrab/cpre-and-cfds-lighting-nuisance-survey-2010-report.pdf?ref=4240>