



Dark Skies Position Statement

September 2023

Using this statement

The purpose of this statement is to provide Bath Preservation Trust with a consistent approach to achieving high standards of design and a sustainable future for Bath. The statement provides details of the best practice measures and objectives to conserve and enhance the dark night sky. It will provide guidance to BPT's Advocacy & Campaigns and Architecture Planning and Place Committees, staff, Trustees, advisors, and parish councils.

BPT is willing to work with Councils, community groups, specialist advisors and Historic England to achieve these objectives.

BPT encourages B&NES Council and others to make use of this Statement when dealing with matters concerning lighting within the City of Bath World Heritage Site (WHS) and its landscape setting, including the Cotswold National Landscape Area of Outstanding Natural Beauty (AONB), green infrastructure, rural conservation areas, Nature Reserves, Special Areas of Conservation, Priority Habitats, Ancient Woodland, Ecological Networks, SSSI and woodlands.

Introduction

In July 2020, B&NES Council declared an Ecological Emergency, recognising the severity of the degradation of the natural environment and loss of wildlife, and the urgency of action to protect and restore life sustaining nature. Tackling the Climate and Ecological Emergency is integral to the sustainable management of the City of Bath World Heritage Site where the natural environment *is* heritage.

The City of Bath World Heritage Site, its landscape setting and adjoining Cotswold National Landscape AONB derives its special qualities from the hidden nature of an inward facing city contained within the hollow of the hills, gentle rural undeveloped 'picturesque' landscape, visual harmony, tranquillity, dramatic views, and cultural heritage.

Much of the WHS landscape setting and AONB has extensive areas of naturally dark night skies. Dark skies are a special quality of the AONB that are important for landscape, the experience of heritage sites and monuments, wildlife, recreational enjoyment, and health and wellbeing.

The WHS setting and AONB is high quality landscape important for biodiversity. It includes a Special Area of Conservation for bats and a substantial part is identified as a Strategic Nature Area. There are a range of habitats including woodland, rivers, floodplains and pasture with opportunities for nature conservation.

Light pollution has the potential to erode and destroy this value.

Light pollution in Bath, the UK's only whole city and landscape World Heritage Site, and the surrounding AONB continues to get worse with the proliferation of blue rich spectrum, bright white LEDs and artificial lighting. Dusk until dawn illumination as well as unnecessary, excessive and over-bright external lighting and street lighting has potential to do great damage to wildlife. Blue-rich spectrum LEDs used in street lighting are a real problem for many species of insects, causing populations to crash and upsetting the natural balance of important ecosystems in our environment.

Increasing light spill and sky glow detracts from the special qualities of the World Heritage Site landscape setting and AONB at night and diminishes the human experience of dark skies.

DS1

It is, therefore considered appropriate that all artificial external lighting within the City of Bath World Heritage Site and its landscape setting within the adjoining AONB, should be dimmed, shielded and the minimum required.

To accord with this aim, no external lighting should be erected or installed in, or within the setting of the WHS and the AONB unless:

- a) They can be shown to be essential for security or safety, and the minimum necessary to achieve it;
- b) They are directed downwards and designed or shielded to prevent upward, sideways, and outward spillage;
- c) They give a light of colour and intensity are appropriate for the wider setting; default CCT (Correlated Colour Temperature) 2700k or lower using warm white or warmer colour tones, consistent with ILP GN08 on Bats and Artificial Lighting in the UK;
- d) They do not highlight a structure or feature that would have an adverse visual impact on the surrounding landscape; and
- e) They utilize the most energy and pollution-efficient equipment that is reasonably available;
- f) They accord with best practice guidance for AONBs, National Parks and Dark Skies reserves (see DS4k);
- g) They are the best options for wildlife e.g. bat friendly (see DS4k).

In order to meet these aims where existing lighting is identified as having an adverse effect on the special qualities of the World Heritage Site landscape setting and character of the AONB, BPT will encourage and facilitate the removal or modification of the lighting units.

Modifying and installing external lighting that meets the above criteria will help to ensure Bath's special character, natural environment and ecology will not be harmed by sky glow or intrusive light and achieve the aim of reducing light pollution to protect the environment and health.

DS2

It is considered appropriate that development proposals within the City of Bath World Heritage Site and its landscape setting within the adjoining AONB should be designed to minimise glare and light spill.

To accord with this aim, development proposals should not be supported or within the setting of the WHS and the AONB unless:

- a) The design and quantity of fenestration is carefully selected to minimise glare, light glow and spill;
- b) The design of roofscapes and roof terraces is carefully considered to avoid light spill, minimise external lighting and in accordance with DS1;
- c) Development and infrastructure projects are integrating positive interventions for wildlife as a matter of course, including bats and nesting birds, and are minimising any negative impacts on wildlife.

DS3

Overarching Principles

The long-term aspiration is that dark night sky within parts of City of Bath World Heritage Site landscape setting and AONB is sustained and enhanced, with fewer areas and sites being affected by light pollution.

BPT will advocate and campaign for measures to be taken to enhance the special qualities of the WHS landscape setting and character and tranquillity of the AONB by (i) removing and (ii) reducing existing sources of light pollution and other visual disturbance.

The relevant authorities, stakeholders, landowners, developers, businesses and residents must ensure that activities and proposals that effect, or have the potential to effect, dark skies character, cause light spill and or sky glow within the WHS and AONB:

- a) Give great weight to the conservation and enhancement of the special qualities of the WHS, its Landscape Setting and scenic beauty the AONB, specifically its dark skies character and tranquillity. In accordance with the NPPF para 176 (appendix 1);
- b) Accord with B&NES Local Plan, Core Strategy Policies, and relevant Placemaking Plan Policies specifically D8, B4, NE2, NE2A, NE3, NE4, NE5 and NE6;
- c) Consider and mitigate the potential impacts and cumulative impact of lighting on the wider landscape in mid to long range views;
- d) Consider and mitigate impact on local landscape character, local feature and local distinctives;
- e) Consider and accord with relevant Conservation Area Character Assessments, and the City of Bath WHS Landscape Setting SPD;
- f) Consider and accord with the Cotswold ANOB Dark Skies Position Statement and Cotswolds AONB Landscape Character Assessment and Landscape Strategy & Guidelines;
- g) Consider and accord with best practice advice for AONBs, National Parks and Dark Skies reserves;
- h) Accord with B&NES Council's Ecological Emergency Action Plan 2023-2030.

DS4

Dark Skies Campaigning Principles

BPT will advocate and campaign at national and local level for:

- a) Dark Sky city status for the City of Bath World Heritage Site, in conjunction with Dark Sky reserve status for the Cotswold National Landscape AONB;
- b) Specific reference to the control of obtrusive light in the National Planning Policy Framework;
- c) National regulations for exterior lighting;
- d) The removal of exemptions to give local authorities a more effective method of preventing nuisance lighting;
- e) Local Development Framework Policies which seek to protect and enhance dark skies character and encourage best practice artificial lighting;
- f) Conservation Area Character Assessments and management plans that include specific dark sky policies;
- g) Planning guidance/design guidance for lighting installations;
- h) Planning conditions related to external lighting, including curfew* hours;
- i) The dimming of all 4000k streetlights installed by B&NES Council and lobbying for the installation of Thorn Plurio Night-tune* when the lights come for renewal;
- j) Lighting strategies;
- k) The transfer responsibilities onto developers through the planning system;
- l) Bylaws which limit unnecessary lighting;
- i) The implementation of nature recovery actions set out in B&NES Council's Ecological Emergency Action Plan 2023-2030;
- m) Wildlife friendly street lighting inline with DS1 and best practice standards;
- n) 'Best practice' standards which include:
 - Minimised artificial lighting, e.g turning every other street lamp off, retaining those at junctions or in crime risk spots
 - Restrictions on further lighting unless a case is demonstrated otherwise
 - Principles like only maintaining lights at a junction, or for public safety
 - Use 2700k or lower using warm white or warmer colour tone
 - The installation of Thorn Plurio Night-tune* for any new lighting
 - Using cowls and directional beams to reduce light-spill
 - Curfew hours
 - Central zone dimming to start half an hour after hospitality closing time (except night clubs)
 - Amber and red-light options for sensitive wildlife areas such as bat corridors, insect rich areas and water courses
 - Evidence based approach for public information campaigns.

* Curfew: The time after which stricter requirements (for the control of obtrusive light) will apply; often a condition of use of lighting applied the local planning department. 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

*Thorn Plurio Night-tune: The Plurio NightTune lanterns are configured as standard to start the evening at 3000K but can be customised to start at 2700K. They then reduce lumen output and change colour temperature (CT) during the hours of darkness. These lanterns have been successfully trialled in the Lake District with a customised dimming/CT changing routine which starts at 2700K and drops to 2200K for most of the night. The Customisation of the LED Driver programme is carried out when the lanterns are manufactured.

Appendix 1

The significance of the AONB is set out in National Planning Policy Framework (NPPF 2021) para 176; 'Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues.' NPPF (2021) para 185 states; '185. Planning policies and decisions should also ensure that new development is appropriate for its location, taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should:

- i. mitigate and reduce to a minimum, potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life
- ii. identify and protect tranquil area which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason; and
- iii. limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.'

Further Best Practice Guidance and Information

The UK Dark Skies Partnership (UKDSP <https://ukdarkskies.org.uk/>) gives a list of guidance here:

<https://ukdarkskies.org.uk/good-lighting-practice>

Towards a Dark Sky Standard <https://www.southdowns.gov.uk/wp-content/uploads/2021/09/Towards-A-Dark-Sky-Standard-V1.1.pdf>

Southdowns Dark Skies Technical Advice Notes: <https://www.southdowns.gov.uk/planning-policy/supplementary-planning-documents/technical-advice-notes-tans/dark-skies-technical-advice-note-tan/>

UKDSP: Local Authorities, Communities and Dark Skies Toolkit

<https://www.southdowns.gov.uk/wp-content/uploads/2022/10/Local-Authorities-Communities-and-Dark-Skies-Toolkit-Oct-2022.pdf>

Blinded by the Light, Commission for Dark Skies https://britastro.org/dark-skies/pdfs/CfDS_booklet_Rev07.pdf

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Protecting the natural landscape and special qualities of the WHS and AONB is compatible with and directly supports BPT's commitment to design excellence and sustainable development and to advocate and campaign for a healthy environment; it supports the value of heritage and setting in protecting and revealing the significance of the World Heritage Site as contained in the Statement of Outstanding Universal Value, sense of place, healthy ecosystems, access to nature and the health and wellbeing of residents. This statement supports BPT's Strategy for Advocacy & Campaigns Design Excellence Objective 2 and Sustainability Objective 2.