

Comments Template

Title of theme that you are commenting on														
Proposed lighting Foxbridge Golf Course development														
Brief summary														
<ul style="list-style-type: none"> • The application does not provide sufficient details for the proposed lighting, despite plentiful inclusion of general guidelines. • Instead, the provision of such details is deferred to a later stage, and subject to change as the project progresses. • Large areas of the site are unaccounted for in terms of any proposed lighting. • The environmental zone of the site and surrounding area will be downgraded from E1 to E2. • The Site is in the setting of the South Downs National Park, and is part of the buffer region which contributed to the park being awarded Dark Sky Reserve status. • The application attempts to blur the impact of the development by suggesting no ‘overall’ change to the environmental zone across an arbitrarily large (78 km²) study area. 														
Detailed comments/areas requiring further information / questions to raise with CDC planning officer – to include document and page references if appropriate. Please draw out specific questions/queries to be drawn to the full Council and planning officer’s attention.														
References														
<table border="1"> <thead> <tr> <th>Ref-ID</th> <th>Title</th> <th>Organisation</th> <th>Document ID</th> <th>Web Reference</th> </tr> </thead> <tbody> <tr> <td>REF-1</td> <td>Light Pollution</td> <td>Environmental Protection UK</td> <td></td> <td>Link</td> </tr> </tbody> </table>					Ref-ID	Title	Organisation	Document ID	Web Reference	REF-1	Light Pollution	Environmental Protection UK		Link
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REF-1	Light Pollution	Environmental Protection UK		Link										
Document: <i>External Lighting Statement</i>														
<p>This document provides a good introduction to the subject of lighting a new development, but defers the provision of any details to subsequent submissions by the developer. This limited remit is first indicated in the <i>Scope</i> section:</p> <p><i>“It should be noted that the luminaires included in this report may not be the final selection of fittings. The information contained within this report does not constitute any lighting design for the proposed development.”</i></p> <p>and then in the <i>Design Brief</i>:</p> <p><i>“The luminaire types referenced above are typical and not final and are subject to future design development.”</i></p> <p>In particular, there is only one reference to illumination levels (see comments on Design Brief section, below), leaving large areas of the site unaccounted for. While the absence of such information may be intentional and meant to indicate no illumination where none is mentioned, it nonetheless introduces a significant level of ambiguity into the plan.</p>														

Therefore, without the provision of further information (e.g. an Isolux Plan), the following areas are considered not to be illuminated:

- Tennis courts (or petting zoo?)
- Five-a-side football pitches
- Car park.

With the exception of the *Application Area* section, which itself adds nothing on the subject of lighting, the document represents an off-the-shelf template whose only tailoring seems to be the address of the site and the name of the Local Planning Authority.

Section: Executive Summary (page 5)

The document's finding that there will be "little or no impact from the proposed external lighting" is at odds with the Landscape and Visual Impact Assessment (LVIA), which predicts a degradation of the environmental zone across the entire site.

Section: Design Brief (page 5)

An average of 10 lux for pedestrian routes is inappropriate, regardless of the environmental zone the site is eventually deemed to be. The target illumination level for such thoroughfares should be a *maximum* of 5 lux [REF-1, page 3].

The advice that "*a lighting designer is appointed at the next project stages [sic]*" should have been given prior to submission of the application. As a result, the document lacks the level of detail necessary for a proposed development in a light-sensitive area.

Document: Ecological Appraisal

Whilst this document provides further guidance on lighting (esp. page 88), it still lacks the necessary specifics to allow for a conclusive assessment of the intended lighting strategy.

Section 4.2: Avoidance/Precautionary Measures (pages 28/29)

Not being security lighting, the illumination of the pedestrian routes is recommended to be kept to the "minimum feasible level". This further questions the 10 lux target cited in the External Lighting Statement for these thoroughfares.

Document: Landscape and Visual Impact Assessment

Section: Effects to the Character of the Night Sky (pages 23/24)

Paras 10.47 – 10.49: The document acknowledges that the loss in sky quality caused by the development would result in the site losing its E1 environmental zone status. It then attempts to reconcile this by suggesting that, in the context of Ifold and Costrong, the overall E1/E2 zone across the study area would remain unchanged. This rationale is at the root of how the dark skies in the UK have been eroded; death by a thousand cuts. It should also not be forgotten that the study area in question is 10km in diameter (para 3.5). On such arbitrarily large scales, it is indeed unlikely that the 'overall' environmental zone would have changed. But this *smoothing out* of the development's impact belies the truly detrimental effect that it will have in the region surrounding the site.

The site is within the setting of the South Downs National Park (SDNP) and is part of the buffer region which contributed to the park being awarded Dark Sky Reserve status. The awarding body – the International Dark-sky Association – recognise this in their summary of the SDNP:

“The Park’s efforts in seeking Dark Sky Reserve status have helped establish it as an important bulwark against the creeping advance of the furthest-outlying London suburbs”.

Section: National Planning Guidance (page 24)

Para 10.58: The extent of the resulting light pollution of the development is greater than that being stated. Unlike glare and light-trespass, which can more easily be mitigated and possibly even contained, the effect of sky-glow reaches far beyond the boundary of the site. This is also why, in para 10.48, it is misplaced to suggest the increase in sky glow would be ‘localised’.