



## The Palm Beach & Whale Beach Association Inc.

[www.pbwba.org.au](http://www.pbwba.org.au) | PO Box 2 Palm Beach NSW 2108

22 November 2020

The Team Leader

Environment and Climate Change Team

Northern Beaches Council

Council Chambers

Dee Why 2099

Dear Team Leader

### Urban Night Sky Membership Application

We appreciate the opportunity to put forward our views in relation to the Council's consideration of an application to the International Dark-Sky IDA (IDA) for Barrenjoey Headland and Governor Phillip Park. We should make the initial point that Barrenjoey Headland is not within the Council's jurisdiction and hence the Council cannot include this area in its application; we should also observe that the Headland is not eligible for inclusion because it is not accessible to the public at night – like most national parks, it closes to public access at dusk.

Dealing with the consideration of an application in relation to Governor Phillip Park, we put forward the following observations: -

- The material released to the public to guide its expression of support or otherwise does not contain any real information about the supposed benefits to the community from a successful application nor does it contain any guidance on the costs of the application. Given that this is being done to enhance the use of the park by a commercial organisation on four nights a year, it is difficult to see how the community will benefit in real terms. The costs will not be insignificant – the application requires considerable effort to complete and includes an audit of all light fixtures within the Park, including its manufacturer, its model number and its full technical specifications plus maps, disclosure of light levels in the surrounding area, a formal lighting management plan to be adopted by the Council, replacement of non-conforming lights and management by the Council of “glare or light trespass” from adjoining

premises and more. Effectively the specification of the lighting within the Park passes to the IDA. The cost of replacement of the existing lighting, which we understand the Council puts at \$70,000 just for light replacement, ought to be included in the information made available to the public to assist it to form its views. It is difficult on the face of the limited information provided to see any real benefit from the project to the community.

- The question needs to be put as to whether it is proper for the Council to incur such costs for the benefit of a commercial organisation which wants to use the Park on just four nights a year, without any reimbursement or return to the Council.
- There are several other commercial operations within the Park and there is no discussion of the impact the application will have on their operations which they will have to modify to meet the requirements of the IDA. They will be required to change the lighting of their premises, for example, and the application will affect the ability of the public to access those facilities. Will they be recompensed for the additional costs they will incur? Have they been consulted? Will the commercial operator of the urban night sky tours be able to alienate the Park from other users on the nights it operates?
- Given the recent spate of home invasions and burglaries in Palm Beach in recent weeks, we do not detect any appetite on the part of local residents to reduce lighting levels at night. Residents will certainly be concerned about the effects on security and safety of changes in the Park's lighting and any measures affecting the security lighting of their adjoining properties.
- There must be some doubt whether the Park meets the definition of "urban night sky place" in the IDA's guidelines. It is arguably not "an exceptional dark sky resource because of its situation on the edge of a built-up urban area. It is not clear that it is within the perimeter extending 50km beyond the edge of the continuously-built area of the municipality. Nor is it clear that the Park is a place "with an exceptional commitment to the ideals of dark sky conservation". Is the Council going to embark on a program to "encourage and involve elected officials, business leaders and residents in light control efforts and promote the ideals of the IDA?"

In summary, this Association does not believe that sufficient information has been made available to the public to enable it to provide advice to the Council. The Association remains to be convinced that there are any real benefits to the community of having Governor Phillip Park accepted by the IDA. At present, therefore, the Association does not favour the Council proceeding with an application to the IDA.

Yours truly

A/Prof Richard West AM

President

Palm Beach & Whale Beach Association