



18 June 2024

To: Environment and Sustainability Policy Branch Sunshine Coast Regional Council

By: email:

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cc: Dr David Moore

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Dear ELS team and David,

**RE: OSCAR response to Dark Sky Reserve proposed nomination (VERSION2)**

***NB. Please note that this is Version 2 of our submission of 16 June. We received some late information from our hinterland groups and consider it is important that it is included, so request that this becomes our submission.***

The Organisation Sunshine Coast Association of Residents Inc. (OSCAR) is pleased to endorse Council's desire to help protect our precious dark skies through its work with the community to establish a Dark Sky Reserve. Given this was only endorsed by Council in the Refreshed ELS in 2023, OSCAR congratulates the team on having the topic researched, the requirements for such protection and the community consultation undertaken within 12 months of the refreshed Strategy having been approved by Council.

The photo of the night sky in the hinterland taken by Dr Ken Wishaw on the "Have your Say" page for this Engagement, and photos throughout the commentary and Fact sheets says it all. Given the location and extent of the hinterland skies and our designation as a Biosphere, seeking such designation and protection is an obvious step.

One of the questions asked in the survey was: "what do you feel are the most important benefits of protecting the night sky?" Six options were identified and the respondent asked to rank them in order of importance, and with a 7<sup>th</sup> open for individual comment.

There is good argument, given the current and forecast population of the Sunshine Coast LGA that almost all are important and it is difficult to rank them. Ranking the list will obviously depend on the values of the responder. However, it is good to see that such a designation is consistent with related actions in all three Council Strategies - ELS, Community and Economic Development.

The survey also asked respondents to list in order of importance (to the respondent) of the following "tools". The list is as the writer ordered them in the survey, not as they were listed in the survey.

1. Lighting upgrades to dark sky friendly lights
2. Education and engagement
3. Removing some lighting in areas where it is not needed
4. Financial assistance to reduce light pollution
5. New Regulation

We include some comments in relation to these tools should the proposal be approved by Council and the designation be made by the Dark Sky International Board. However, we note that

**1. Lighting upgrades to dark sky friendly lights**

We encourage Council to take the lead in this area and to develop a plan and budget to undertake this task on all Council sites within the proposed Reserve area. Council should also continue to work

with TMR, the power and water utilities, other State agencies and USC to review their existing lighting and implement dark sky friendly lighting throughout the region.

## **2. Education and Engagement**

This must be a critical part of the process and education must be seen in a broad definition. In this context “Education” can occur within formal school and tertiary institutions and through curriculum-based studies, or can be undertaken in schools and education in an informal way, through photography, art, environment groups etc.

However such a concept in adult circles must be considered in a different manner in order for any process to be undertaken in a way suited to the participants’ learning and engagement preferred style. The “Extension Approach” for example as applied in Government Departments and Tertiary Institutions might be more suitable.

Similarly, engagement processes may also vary.

As there are currently no specific national lighting standards aimed at reducing light pollution generally and for light sensitive environments in particular, we suggest Council:

- extend its existing lighting policy to include specific references to the protecting Dark Sky Reserve values and other sensitive environments from light pollution
- develop light education material for use on its website and by its planning and development staff
- engage with electrical contractors, architects, building designers, building certifiers, major developers, the urban development institutes and property managers operating in the region on the need to reduce light pollution, and how to do that, including cost-effectiveness
- include references to the proposed Reserve declaration and protecting its values in the Local Plan Areas for the Blackall Range and Mary Valley in the Draft Planning Scheme submitted for public consultation. (If approved, the declaration will likely occur after the Scheme is processed in draft and final form, but it will be useful to flag proposal, the values, and the need to protect those values starting with the Draft Scheme consultation stage.)

In the documentation on the Council website relating to the Stages of the Designation process reference is made as follows.

*“12. What is the process of applying for a Dark Sky Reserve designation? There is a formal written application process for applying for a Dark Sky Reserve designation under the International Dark Sky Places Program. A comprehensive application includes: A lighting management plan and inventory Evidence of commitment and action to protecting the night sky and engaging with the community for a minimum of 12 months prior to submitting an application. Evidence of community support confirming long-term engagement and commitment towards the creation of the Dark Sky Place. ”*

We understand however that this project is essentially a community driven initiative with a great deal of work having been done voluntarily by Ken Wishart and the local astronomy group doing talks at community and environment groups events/meetings and that they have expressed interest in getting some media coverage. This has mainly been focussed on the proposed Reserve area in the hinterland. We note that OSCAR referenced this project in our submission to the second stage consultation of the ELS.

This is a great example of a local community recognising the significance of the impressive Dark Sky existing in its locality and promoting its recognition and protection through engagement with Council, State agencies, the community and business.

We congratulate Ken, other astronomers and Council on the extensive consultation, especially with the affected community in the proposed Reserve area.

### **3. Removing some lighting in areas where it is not needed.**

Although we agree in principle with this tool, we are concerned that careful consideration is given to security and safety concerns. Any such suggestions should preferably be identified by the community or responded to where suggested by Council bureaucracy. This comment is not intended to be critical of Council Officers as one can see the Headlines in the Media and in particular Social Media – *“Council turns the lights off or Council not worried about community safety!!”*

We suggest this topic should be redefined as Removing lighting where and when it is not needed. There may be potential improvement to public safety that can occur by removing lighting from some areas, relocating it to other areas, and installing movement sensitive lighting and time controlled lighting.

### **4. Financial assistance to reduce light pollution.**

This is an interesting concept and OSCAR does not need to tell Council that again the critics will be on social media about Council and “wasting money”. Suggestions for such an approach might be sourced from the community including for example surveys of residents in Divisions 5 and 10.

### **5. New Regulation**

This must be a “last resort” given the cost of living pressures many people on the SC are experiencing. Could Council consider new Regulations for new dwellings, significant renovations and new developments?

We know, however, that the proposed Reserve area will inevitably be subject to future light pollution issues that will potentially threaten the Dark Sky values - mainly because of planned development in and around Maleny and new development in the rural areas, including close to the hinterland National Parks and other areas of conservation value that are key elements of the Reserve proposal (e.g. new dwellings and secondary dwellings, cabins, farm stays, bush camping, wedding and restaurant facilities, rural industry developments).

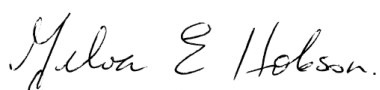
OSCAR suggests that Council should consider the need to include light pollution impact regulations, (e.g. code requirements for new development, major renovations and major extensions) applicable to the Reserve area in the new Planning Scheme or amendments to the Scheme once the declaration occurs. This will affect only the Blackall Range and Mary Valley Local Plan Areas in Divisions 5 and 10.

### **Conclusion**

OSCAR endorses the proposal and is happy to support Council in advancing this initiative. Being a little “cheeky”, we would like to see a similar initiative made in relation to lighting in coastal areas where turtle hatching occurs. In fact we would see it applied through the new Planning Scheme so that it cannot either be challenged in the court/tribunal or watered down by Council where a developer indicates he “can’t afford” the agreed lighting.

Thank you again for the opportunity to participate and we are happy to continue to be involved.

Yours sincerely



Melva Hobson PSM  
President  
OSCAR  
(Organisation Sunshine Coast Association of Residents)

