



· INSTITUTE · OF · HISTORIC ·  
BUILDING · CONSERVATION

*Making Heritage Work*

Artificial Light Exemptions  
Noise and Nuisance Team  
Defra  
Area 5A Ergon House  
Nobel House  
17 Smith Square  
London  
SW1P

James Caird  
Consultant Consultations Co-ordinator  
IHBC Business Office  
Jubilee House  
High Street  
Tisbury  
Wiltshire  
SP3 6HA

17 February 2012

Tel (01584) 876141  
Web site [www.ihbc.org.uk](http://www.ihbc.org.uk)  
E-mail [consultations@ihbc.org.uk](mailto:consultations@ihbc.org.uk)

Dear Sirs

**ARTIFICIAL LIGHT STATUTORY NUISANCE – CONTINUED UTILITY OF THE  
CURRENT EXEMPTIONS FOR CERTAIN PREMISES**

The Institute of Historic Building Conservation (IHBC) is the professional body of the United Kingdom representing conservation specialists and historic environment practitioners in the public and private sectors. The Institute exists to establish the highest standards of conservation practice, to support the effective protection and enhancement of the historic environment, and to promote heritage-led regeneration and access to the historic environment for all.

Thank you for inviting us to participate in this consultation.

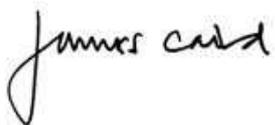
The Institute favours the removal of the exemption for as many of the exempted categories as possible. Premises of the exempted categories are often located in or near conservation areas or in the setting of listed buildings. Some even occupy or utilize listed buildings. There has been a general trend, over many years, for lighting schemes in such locations to be sensitively designed and operated and we believe that the current proposals will help to continue this trend.

We have no doubt that some operators will argue that removal of the exemption will create an undue burden for them. In response we suggest that:

- Almost all of industry is not exempted and manages to cope with the Statutory provisions without much difficulty.
- Modern light fittings that will constitute “best practicable means” generally have low pollution and low energy characteristics, making them a beneficial investment as well as improving neighbourliness.
- If Defra feels that it is merited, a delayed implementation date could allow those who feel they are adversely affected to budget for and install compliant installations and procedures.

We hope these comments are helpful.

Yours faithfully

A handwritten signature in black ink that reads "James Caird". The signature is written in a cursive style with a large initial 'J'.

James Caird  
Consultant Consultations Co-ordinator