

Joan Desmond
West Oxfordshire District Council
Elmfield
Witney
OX28 1PB



By email only to: Joan.Desmond@westoxon.gov.uk

18 June 2021

Dear Joan

APPLICATION NO: 21/02456/FUL

DESCRIPTION: Development works to create new sports facilities including new hockey field and playing field together with a new pavilion. Associated hard and soft landscaping works and provision of new vehicular access.

LOCATION: School, Kitebrook House, Little Compton, Oxfordshire GL56 ORP

Thank you for consulting the Cotswolds Conservation Board ('the Board') on the above planning application, which is for a proposed development within the Cotswolds National Landscape.

The Board recognises the importance of sports facilities at schools within the Cotswolds National Landscape, particularly with regards to the benefits that these facilities provide for improving the physical and mental health and well-being of the students. However, in a nationally important landscape such as the Cotswolds, these facilities should be provided in a way that is compatible with – and, ideally, positively contributes to – the purpose of conserving and enhancing the natural beauty of the area.

As outlined below, we are concerned that the proposed development is not compatible with this purpose and that it would, in fact, cause harm to the natural beauty of the area. For this reason we object to the proposed development and recommend that planning permission should be refused.

We are particularly concerned about the impact of the proposed development on the dark skies and historic environment of the Cotswolds National Landscape.

A key concern is the proposed floodlighting. The applicant asserts that the floodlighting would comply with the Institution of Lighting Professionals' obtrusive light limitations for exterior lighting in intrinsically dark landscapes, such as Areas of Outstanding Natural Beauty. However, they do not appear to demonstrate that this is the case. Indeed, their supporting evidence appears to contradict this assertion.

Failure to comply with these limitations would mean that the development could potentially result in adverse impacts on the dark skies of the Cotswolds National Landscape, which are one of the area's 'special qualities'. This could also result in adverse impacts on the two Dark Sky Discovery Sites that are located within the Cotswolds National Landscape, at Rollright Stones and Long Compton.

Even if the proposal does comply with these limitations, there would still be the issue of introducing lit elements into the intrinsically dark, night-time landscape. Given the height of the proposed floodlights, this new 'lit element' could potentially be seen as an incongruous feature up to

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The Cotswolds National Landscape is a designated
Area of Outstanding Natural Beauty (AONB),
managed and looked after by the Cotswolds
Conservation Board.

cotswoldsaonb.org.uk

Chairman:
Brendan McCarthy

Vice Chair:
Rebecca Charley

approximately 14km away to the east or west (i.e. the directions in which the floodlighting would be directed).

Our other key concern is the loss of the extensive and well preserved 'ridge and furrow', which would result from the proposed development. This ridge and furrow is another of the National Landscape's 'special qualities'.

The planning application fails to clearly articulate the need for the development (other than for the use of children at Kitebrook School) or the benefit that it would bring to the local community. In particular, there does not appear to be any justification for requiring use of the facilities (including the floodlighting) until 20:30 on weekdays and 18:30 on weekends. As such, we do not consider that the need for the proposed development outweighs the adverse impacts.

Even if further constraints were placed on the hours in which the floodlighting could be used, we would still be minded to object to the proposed development because of the impact on the ridge and furrow historic landscape.

Without prejudice, if West Oxfordshire District Council is minded to grant planning permission, we recommend that the hours in which the floodlighting is permitted to operate is limited to 18:00 hours on weekdays, with no floodlighting permitted at weekends.

Further, supporting information is provided in Appendices 1 and 2, below.

If you have any queries regarding this response, please do not hesitate to get in touch.

Yours sincerely,

A handwritten signature in black ink that reads "John Mills". The signature is written in a cursive style with a long, sweeping underline.

John Mills
Planning & Landscape Lead
john.mills@cotswoldsaonb.org.uk | 07808 391227

APPENDIX 1. SUPPORTING INFORMATION

Key Features / Characteristics

We acknowledge that the applicant's Planning Statement makes reference to the implications of the proposed development being within Cotswolds National Landscape. However, we are very disappointed that the applicant has not provided a more detailed Landscape & Visual Appraisal.

The Cotswolds AONB Landscape Character Assessment (LCA) identifies 19 different landscape character types (LCTs) within the National Landscape.¹ The site is located within LCT 17 (Pastoral Lowland Vale).

The site and its immediate locality reflect a number of the key features / characteristics of this LCT, including:

- productive and verdant landscape of lush improved and semi-improved pastures;
- the landscape's rural, agricultural character.

As it is a site in a nationally important landscape and is representative of the local landscape character, the landscape value is high.

The proposed development is not a characteristic feature of this LCT. As such, there would potentially be adverse effects on landscape character.

However, we acknowledge that the site forms part of the school complex and that it has visual connectivity with the school buildings, across what appears to be a playing field. We also note that there are existing outdoor sports facilities, including tennis courts. With this in mind, we consider that the susceptibility of the landscape to the proposed change is relatively low.

The high value of the landscape combined with this low susceptibility results in a medium, or moderate, sensitivity.

We consider that scale of change in the landscape is likely to be quite low, as is the geographical extent over which the landscape effect would be felt. Therefore, the overall significance of the landscape effects, with regards to the characteristic features of this LCT, is likely to be low / medium adverse.

It is important to note that this brief assessment just relates to the key features / characteristics of LCT 17. We have additional concerns relating to the adverse effects of the proposed development on dark skies and historic environment. These are addressed separately below. However, these adverse effects should be factored into the overall assessment of significance of landscape and visual effects.

Historic Environment

The applicant's Historic Environment Desk Based Assessment (HEDBA) states that '*there is a known archaeological interest within the Site in the form of extensive and well preserved medieval ridge and furrow and a possible field boundary*' which are associated with the Bookend Deserted Medieval Village (DMV) to the south.

¹ <https://www.cotswoldsaonb.org.uk/our-landscape/landscape-character-assessment/>

Ridge and furrow is one of the ‘special qualities’ of the Cotswolds National Landscape.² In other words, it is a key attribute on which the priorities for the area’s conservation, enhancement and management should be based. As such, any potential loss of ridge and furrow is a key consideration.

The fact that the ridge and furrow on the site is ‘*extensive and well preserved*’ makes it even more significant, as does its association with Bookend Deserted Medieval Village (DMV) to the south.

The HEDBA states that ‘*other than the visibly upstanding ridge and furrow and bank, there are no indications that, if present, the archaeological resource within the Site would be so complex, rare, and well preserved so as to elevate its significance and preclude development*’ (underlining added for emphasis). This indicates that the ridge and furrow and bank *does* elevate its significance and should potentially preclude development.

Dark Skies

The proposed development includes eight, 15m high floodlights, mounted with 20 luminaires, and 24 1m high bollard lights.

This lighting, particularly the proposed floodlighting, has the potential to cause light pollution and to introduce ‘lit elements’ into the intrinsically dark, night-time landscape of the Cotswolds National Landscape.

The fact that the site lies in a part of the Cotswolds National Landscape that has relatively low levels of light pollution makes this issue even more significant,³ as does the fact that the site lies within 5km of the only two Dark Sky Discovery Sites that are located within the National Landscape.⁴ Although these Dark Sky Discovery Sites might not have direct visual connectivity with the site, any sky glow from the proposed development could potentially diminish the night sky viewing experience at these sites.

The dark skies of the Cotswolds National Landscape are another of the area’s ‘special qualities’. As such, any potential adverse impacts on these dark skies is a key consideration. In recognition of this importance, Policy CE5 of the Cotswolds AONB Management Plan 2018-2023 states that ‘*proposals ... should have regard to these dark skies by seeking to (i) avoid and (ii) minimise light pollution*’.⁵

The issue of dark skies and artificial light is also addressed in the Board’s Position Statement on this topic.⁶ The Position Statement advocates the application of recognised standards, in particular the standards developed by the Institute of Lighting Professionals (ILP), which forms Appendix B of the Position Statement.⁷

The applicant’s Planning Statement refers to the ILP guidance and acknowledges that the site is within Environmental Zone E1, which is the relevant zone for Areas of Outstanding Natural Beauty such as the Cotswolds National Landscape. The Planning Statement infers that the proposed development

² Cotswolds Conservation Board (2018) *Cotswolds AONB Management Plan 2018-2023* ([link](#)). Chapter 2.

³ Cotswolds Conservation Board (2019) *Dark Skies & Artificial Light Position Statement*. Appendix A – Night Lights ([link](#)).

⁴ The Rollright Stones scheduled monument, near Chipping Norton, and Aunt Phoebe’s Recreation Ground, Long Compton.

⁵ Cotswolds Conservation Board (2018) *Cotswolds AONB Management Plan 2018-2023* ([link](#)). Policy CE5.

⁶ Cotswolds Conservation Board (2019) *Dark Skies & Artificial Light Position Statement* ([link](#)).

⁷ Cotswolds Conservation Board (2019) *Dark Skies & Artificial Light Position Statement*. Appendix B – Institution of Lighting Professionals – Guidance Notes for the Reduction of Obtrusive Light ([link](#)).

complies with the ILP's obtrusive light limitations for Environmental Zone E1. However, it does not appear to explicitly demonstrate that this is the case. For example, it does not appear to specify:

- The sky glow 'upward light ratio' (max. for E1 = 0%).
- Light intrusion into windows pre-curfew (max. for E1 = 2 lux).
- Luminaire intensity pre-curfew (max. for E1 = 2,500 candelas).
- Building luminance (max. pre-curfew = 0 candelas/m²).

The Planning Statement indicates that the three closest residential neighbours would experience 'glare' of 127-195 candelas. It doesn't specify the building luminance. However, given the stated glare of 127-195 candelas, it obviously doesn't comply with the ILP limitation of 0 candelas/m².

If the applicant can't explicitly demonstrate that the proposed development would comply with the ILP limitations then the development should not be permitted.

The applicant provides no justification of the lighting potentially being on until 20:30 on weekdays and 18:30 on weekends. Even if it is used for games after school lessons finish in the afternoon, the games would presumably finish by, say, 18:00 on weekends. Presumably, any weekend games could be played during hours of daylight. As such, there doesn't seem to be any justification for floodlighting after, say, 18:00 on weekdays or outside daylight hours at weekends. Therefore, even if the development does comply with the ILP guidance, the hours in which the floodlighting is permitted to operate should be reduced.

A separate, albeit related, issue is the introduction of lit elements into characteristically dark, night-time landscapes. This issue is not so much about light pollution, per se, but more about the extent to which a proposed development introduces new sources of light and the extent to which this lighting is noticeable, as an incongruous feature, at night-time, compared to the current baseline.

The Cotswolds AONB Landscape Strategy and Guidelines for LCT 17 identifies the introduction of lit elements into characteristically dark landscapes as a potential adverse landscape implication.⁸ As such, the introduction of lit elements into characteristically dark landscapes would not be consistent with the Landscape Strategy and Guidelines and, by extension, the policies of the Cotswolds AONB Management Plan 2018-2023.

Given that the floodlights would be 15m above ground level it is highly likely that they would feature as a new lit element across a substantial area, well beyond the area across which ground-level lighting would be seen. As well as affecting visual receptors within LCT 17, it could also potentially affect receptors in LCT 15 (Farmed Slopes) and LCT 7 (High Wold), for example, from elevated viewpoints on roads and in settlements to the east and south, including Chastleton.

The historic interest and character of the listed buildings in the immediate vicinity of the proposed development could also be adversely affected by the floodlighting.

Visual Impacts (during daytime)

We are very disappointed that the planning application has not provided a detailed Landscape & Visual Appraisal.

⁸ <https://www.cotswoldsaonb.org.uk/wp-content/uploads/2017/07/lct-17-pastoral-lowland-vale-june-2016.pdf>. Sections 17.2 and 17.8.

We acknowledge that there are few public rights of way (PROW) in the immediate vicinity of the site, especially one that are at an equivalent, or higher, elevation. However, there would potentially be interconnectivity between the proposed development and the footpath to the east, between Kitebrook and Salter's Well Farm (Warwickshire PROW Ref: 201/SS92k/1).

We also acknowledge that the site is relatively well screened from the A44 and from the minor road immediately to the west of the site.

The location where the (day time) visual impacts are likely to be most noticeable is along this minor road, between the southern edge of the site and Kitebrook-End Farm, over a distance of approximately 330m. This is because the site slopes in a southerly direction and the hedgerow along the southern boundary of the site is relatively low.

When viewed from this section of the minor road, the most visually intrusive elements of the proposed development, during daylight hours, are likely to be the floodlighting infrastructure, the pavilion and possibly any associated fencing.

Overall, there is likely to be a minor adverse visual effect (when the floodlighting is not in use).

Biodiversity

The planning application highlights the proposed 'Kitebrook native shrub planting' which would include the following species:



CORNUS SANGUINEA
(MID-WINTER FIRE
FLAMING DOGWOOD)



LIGUSTRUM VULGARE
(COMMON PRIVET)



PRUNUS SPINOSA
(BLACKTHORN / SLOE)



VIBURNUM OPULUS
(ROSEUM / SNOWBALL)

However it is worth noting that the Cornus and Viburnum species shown in the photographs are garden varieties, not natives. The proposed native shrub planting should use genuinely native species.

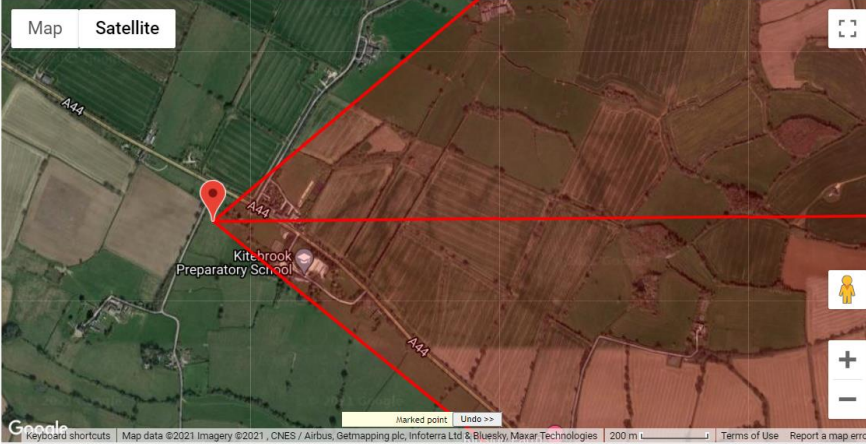
Need

The planning applications fails to clearly articulate the need for the development (other than for the use of children at Kitebrook School) or the benefit that it would bring to the local community, particularly with regards to the need for the facilities to be used in the evenings (during hours of darkness).

APPENDIX 2. DISTANCE FROM WHICH THE PROPOSED DEVELOPMENT COULD POTENTIALLY BE SEEN

The information presented below uses visual panorama software from the Ulrich Deuschle website (https://udeuschle.de/panoramas/makepanoramas_en.htm). This indicates that the floodlights, could, in theory, be seen up to approximately 14km away to the west or east.

View to the east



Map Satellite

Keyboard shortcuts | Map data ©2021 Imagery ©2021, CNES / Airbus, Getmapping plc, Infoterra Ltd & Bluesky, Maxar Technologies | 200 m | Terms of Use Report a map error

Second option: Select viewpoint from a list

Name of the summit ☐ begins with ☒ contains (* as wildcard)

View direction ☐ N ☐ NE ☐ E ☐ SE ☐ S ☐ SW ☐ W ☐ NW ☐ 360°

Third option: Set viewpoint data directly

Latitude (°): 51.98028 Longitude (°): -1.6496 Altitude (m): auto Camera height (m): 15 ☒ Look for summit point automatically

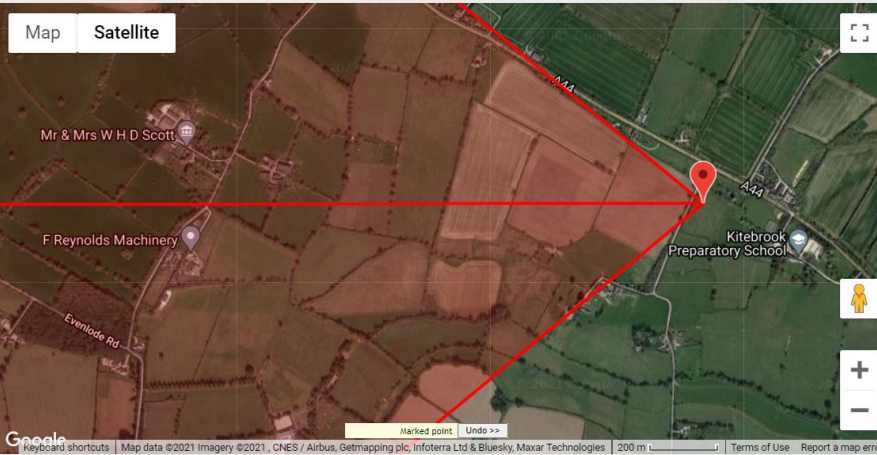
View direction (°): 89.5 Left edge (°): 50 Zoom factor: 1 Resolution (pix/deg): 20

Horizontal extension (°): 79 Right edge (°): 129

Preview:

Altitude: 148 m
Most distant point: 14 km

View to the west



Map Satellite

Keyboard shortcuts | Map data ©2021 Imagery ©2021, CNES / Airbus, Getmapping plc, Infoterra Ltd & Bluesky, Maxar Technologies | 200 m | Terms of Use Report a map error

Second option: Select viewpoint from a list

Name of the summit ☐ begins with ☒ contains (* as wildcard)

View direction ☐ N ☐ NE ☐ E ☐ SE ☐ S ☐ SW ☐ W ☐ NW ☐ 360°

Third option: Set viewpoint data directly

Latitude (°): 51.98022 Longitude (°): -1.64973 Altitude (m): auto Camera height (m): 15 ☒ Look for summit point automatically

View direction (°): 270 Left edge (°): 230.5 Zoom factor: 1 Resolution (pix/deg): 20

Horizontal extension (°): 79 Right edge (°): 309.5

Preview:

Altitude: 147 m
Most distant point: 13 km