



Isabel Daone
Planning Services
Bath & North East Somerset Council
Lewis House
Manvers Street
Bath
BA1 1JG

By email only to: isabel.daone@bathnes.gov.uk

18 May 2023

Dear Isabel,

APPLICATION NO: 22/04720/FUL

DESCRIPTION: Construction of a floodlit, recyclable all-weather turf pitch and Multi-Use Games Area (MUGA), and additional lighting to the existing training strip

LOCATION: Eastern Sports Field, Sports Training Village, University of Bath Campus, Claverton Down, Bath

Thank you for consulting the Cotswolds National Landscape Board¹ ('the Board') on the further information submitted by the applicant in support of this proposed development, which would be located within the Cotswolds National Landscape².

In the Board's previous responses to this application dated 19 January 2023 and 22 March 2023 we raised a holding objection and requested that the applicant submit further information to assist our assessment of any potential adverse impacts of the proposal on the natural beauty of the Cotswolds National Landscape.

We do not wish to repeat the content of these previous responses, so please consider this response in conjunction with our previous responses. For the reasons outlined in Annex 1 we do not agree with the applicant's arguments outlined in their Landscape and Visual Technical Note dated 25 April 2023 and our view remains that the current proposals would not conserve and enhance the landscape and scenic beauty of the National Landscape and, as such, would not be consistent with policies SB19 and NE2 of the BANES Local Plan 2011-2029, paragraph 176 of the NPPF and policy CE1 of the Cotswolds AONB Management Plan 2023-2025.

Therefore, we wish to **object** to this application and recommend that the applicant either revises their proposal, in particular to reduce the scale and visual impact of the solid timber fencing and the floodlights or withdraws the application.

Cotswolds Conservation Board

Cotswold Business Centre
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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

Please don't hesitate to contact me if you wish to discuss this response further.

Yours sincerely,

A handwritten signature in black ink, appearing to be 'S. Joyce', with a small dot at the end.

Simon Joyce

Planning Officer

simon.joyce@cotswoldsaonb.org.uk | 07808 391227

ANNEX 1. COTSWOLDS NATIONAL LANDSCAPE CONSULTATION RESPONSE IN RELATION TO PLANNING APPLICATION 22/04720/FUL

In the Board's previous responses to this application dated 19 January 2023 and 22 March 2023 we raised a holding objection to this application and recommended that the applicant considered revising their proposal, in particular to reduce the scale and visual impact of the solid timber fencing and the floodlights. We do not wish to repeat the content of these previous responses, so please consider this response in conjunction with our previous responses.

We also note the responses of the Council's Landscape Officer dated 3 February 2023 and 26 March 2023, who has also objected and recommended that the scheme be revised.

The applicant has subsequently submitted a further Landscape and Visual Technical Note and a covering letter, both dated 25 April 2023. Both documents seek to justify the current proposals rather than revise the scheme.

Landscape and Visual Impact

We do not agree with the suggestion within the letter that as effects on more distant receptors within the National Landscape may have been assessed as being lower than on close-range receptors, this means that the more significant effects at close range are not as important; all views need to be judged on their individual independent merits.

The Landscape and Visual Technical Note provides further information in Tables 1 and 2 which are welcomed given our previous comments. However, no meaningful definitions or criteria have been provided to show how the assessments for value, sensitivity and magnitude have been reached (i.e. what constitutes 'low', 'medium' or 'high'), which would be expected to accompany any such assessment and is common practice in LVIAs.

Notwithstanding, we note the updated assessment from immediate views from bridleway BC74/1 (viewpoints 2 and 3) however, for the reasons outlined in our response dated 22 March 2023, we still consider that an assessment of 'low/medium' sensitivity for receptors (walkers) and a 'low/medium' magnitude of change at construction and completion reducing to 'negligible/low' at 15 years resulting in a 'minor-moderate adverse' reducing to 'minor adverse' effect underestimates and seeks to downplay the impact of the proposal.

Whilst it is understood that the application is not subject to EIA, it is here that we disagree with the applicant and consider that the scheme's impact *would* be significant (i.e. *at least* a moderate significance of effect) as outlined in our response dated 22 March 2023. We also note the Council Landscape Officer's assessment that the scheme's adverse impacts would be significant.

Furthermore, whilst the context given by the applicant in their letter dated 25 April 2023 is understood, we do not agree that designing a scheme to be acceptable in the eyes of statutory ecological consultees provides justification to bring forward a scheme which in our view gives rise to adverse impacts upon the landscape and scenic beauty of the National Landscape.

In conclusion, we still consider that the proposal as currently submitted would not conserve and enhance the landscape and scenic beauty of the National Landscape and, as such, would not be consistent with policies SB19 and NE2, paragraph 176 of the NPPF and policy CE1 of the Cotswolds AONB Management Plan.

Other matters

Research indicates that light from the blue end of the spectrum, particularly from LED lighting, could have important adverse effects on fauna and flora, particularly insects. The collapse of insect numbers negatively affects the food chain and they are also essential for pollination.

Without prejudice, should the Council be minded to grant planning permission, we recommend that the lighting scheme reflects the advice contained within the most recent versions of guidance notes ILP GN01 (updated in 2021) and ILP GN08 (updated in 2018). The blue light spectral power of light sources should be closely reviewed and consideration given to the use of balanced spectrum LEDs and amber and red spectrum low energy lights.

NOTES:

- 1) Cotswolds National Landscape is the new name for the Cotswolds Areas of Outstanding Natural Beauty (AONB). The new name takes forward one of the proposals of the Government-commissioned 'Landscapes Review' to rename AONBs as 'National Landscapes'. This change reflects the national importance of AONBs and the fact that they are safeguarded, in the national interest, for nature, people, business and culture.
- 2) The name used for the organisation associated with the AONB designation is the Cotswolds National Landscape Board. At times this is abbreviated to National Landscape Board or The Board. The legal name of the organisation remains the Cotswolds Conservation Board but this name is no longer used in most circumstances.

