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By email only to: [Isabel\\_Daone@BATHNES.GOV.UK](mailto:Isabel_Daone@BATHNES.GOV.UK)

23 August 2022

Dear Isabel

**APPLICATION NO:** 21/01862/FUL

**DESCRIPTION:** Proposed refurbishment and replacement of existing floodlighting and columns

**LOCATION:** Ball Courts, Sports Training Village, University of Bath Campus, Claverton Down, Bath

Thank you for consulting the Cotswolds Conservation Board ('the Board') on the amended drawings / information relating to this proposed development, which would be located within the Cotswolds National Landscape.<sup>1</sup>

As you will be aware, we have previously objected to the proposed development in letters dated 4 June 2021 and 13 October 2021. In the letter dated 13 October 2021, we maintained our original objection to the planning application and recommend that planning permission should be refused unless:

- a) the current / proposed floodlighting of the 3G training strip (i.e., the east-facing floodlights / back-lights on columns P7 and P8) is removed; and
- b) a planning condition is imposed which states that none of the floodlighting is permitted to operate between 10pm and 8am.

The latest information that has been submitted by the applicant states that the revised scheme has removed the east facing back lights from columns P7, P8 & P9 over the 3G training strip. This addresses point (a).

The latest information also re-iterates that the proposals would comply with recommended obtrusive light limitations for AONBs (i.e., the 'Environmental Zone E1' classification), as set out in the 'Guidance Notes for the Reduction of Obtrusive Light' published by the Institution of Lighting Professionals. This addresses one of the issues that we raised in our original objection.

With regards point (b), we are aware that the applicant has indicated that they would like the curfew to run from 22:15 to 06:00. However, we consider that a curfew running from 22:00 to 07:30 would be more appropriate, in line with related planning applications (e.g., the curfew set for planning application 16/00185/FUL). It is worth noting that this curfew (22:00 to 07:30) was set '*In the interests of protecting the natural beauty of the Area of Outstanding Natural Beauty and protecting ecology in accordance with policies NE.2 and NE.11 of the Bath and North East Somerset Local Plan*'. The same justification would apply in this instance. It is also worth noting that this is a less restrictive curfew than we recommended in our previous response, which demonstrates some flexibility on our part.

#### **Cotswolds Conservation Board**

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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](http://cotswoldsaonb.org.uk)

*Chairman:*  
**Brendan McCarthy**  
*Vice Chair:*  
**Rebecca Charley**

Assuming that a planning condition is imposed, which states that none of the floodlighting is permitted to operate between 22:00 and 07:30 (or words to that effect), then **we would be willing to withdraw our objection to this planning application.**

However, this withdrawal is based on the assumption that planning permission was secured for the existing floodlights. We are aware that there is still currently some doubt as to whether that is the case. If planning permission was not secured, this would potentially alter our position in relation to this planning application. For example, if planning permission was not secured for the existing floodlights, then the current planning application should be assessed against a baseline in which there is no existing floodlighting for the hockey pitches. When compared against this baseline, the current proposal would increase, rather than decrease, levels of light pollution, which would be contrary to Policy CE4 of the Cotswolds AONB Management Plan.

If you have any queries regarding this consultation response, please do not hesitate to contact me.

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 that extends to the right.

John Mills

**Planning & Landscape Lead**

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**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.