**Bath Preservation Trust**

**19/01/2023**

**22/04720/FUL**

**Eastern Sports Field, Sports Training Village, University Of Bath Campus, Claverton Down, Bath, Bath And North East Somerset,**

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

*Objection*

The eastern sports field is located within the Bath World Heritage Site (WHS), the Cotswolds AONB, and the indicative landscape setting of the Bath conservation area. It is closely abutted along its east and south boundaries by the Bath & Bristol Green Belt. The Claverton Down University of Bath campus is located along the Bath skyline and consequently forms part of the landscape setting of Bath. The skyline is predominantly populated with trees, tree belts, and woodland forming Bath’s green, undeveloped setting, and constitutes the Green Setting Outstanding Universal Value (OUV) of the WHS. The university campus is positioned on the Cotswold plateau, on the ridge of Bath’s green ‘bowl’ overlooking the city, and forms part of the wooded backdrop to the south of the city, experienced in key southerly panoramas from viewpoints such as the Approach Golf Course and Alexandra Park.

The site is situated on the southern outer edge of the plateau. Here, the landscape qualities of the Cotswold AONB are characterised by the ‘High Wold Dip Slope’, comprising of the gently rolling landscapes that generally fall south-eastwards away from the areas of the High Wold plateau to where they merge into the Dip-Slope Lowlands landscape character type. The close proximity of Bath has had a profound influence, with the University of Bath campus exerting a strong suburbanising influence on the character of the local landscape (Cotswold ANOB Landscape Character Assessment).

Inappropriate development in the green setting of Bath has the potential to impact negatively on Bath’s rural context, important landscape views, the character and tranquillity of green spaces, the picturesque qualities that directly sustain Bath’s Landscape Setting OUV, and associated contributions to the health and welfare of residents. Development could also have an adverse impact on the identified ecological and biodiversity interest of the area, contrary to B&NES’ objectives for the Climate and Ecological Emergency.

This application proposes to upgrade the existing sports’ facilities to the east of the campus site with an artificial turf pitch and Multi-Use Games Area (MUGA), to include land re-profiling works and the installation of additional floodlighting beyond the currently illuminated extent of the ball courts (see 21/01862/FUL).

As part of the University of Bath’s 2021 masterplan report, the eastern playing fields are identified as an area of possible development for a new 3G pitch and training pitches/courts, with new student accommodation above along the eastern boundary. Local Policy SB19 has allocated this area for the provision of *“largely sport related development, pitches, tennis courts and a car park within the Cotswolds AONB where university related development is also acceptable in principle.”* However, development is also expected to account for a comprehensive assessment of potential impact on the Cotswolds AONB and the Bath and Bradford-on-Avon Bats SAC, and how negative effects would be moderated. In particular reference to the eastern playing fields, Policy SB19 sets out the following development principles: *“Further to the provisions for policy area (2) the design of development on the eastern playing fields should be landscape–led given its largely undeveloped nature and location within and potential to affect the qualities of wider AONB. Special attention should be paid to addressing general criteria (d) (f), and (j) and boundary treatments, paying particular regard to the impact of development on SAC bats and views from the wider Cotswold AONB.”*

Specific reference is made to the need to control lighting output in relation to landscape and ecology concerns in Policy SB19 (J): *“In all circumstances lighting shall be designed to minimise the amount of dusk to dawn illumination on the campus and light spill from the campus to moderate the impact of development on the AONB, the significance of the World Heritage Site and protected species (bats).”*

Previous mitigatory works have included the planting of extensive tree shelter belts around the site, to include retention and maintenance of pre-existing historic tree planting along The Avenue and woodland to the north, to limit the visual impact of high-density development in wider landscape views experienced from and across Bath. Tree screening to the north and west in particular also aims to conceal the built form of the campus from sensitive landscapes and landmarks such as Bathampton Down and Sham Castle. A large number of tree belts on the campus site are the subject of TPOs as of 2019 (see TPO 500/317).

BPT acknowledges the principle of the continued and improved provision of outdoors sports facilities on this site, in accordance with the 2021 masterplan report. Where development would continue to be of a low density and retain an open appearance and character, we consider that this could be a discreet addition to the AONB with very limited impact on its identified special qualities.

**However, we have strong concerns regarding the proposed height of the 18.3m floodlights to be installed as part of the playing field upgrade, and the associated perceived build-up of the site, visual intensification of use, and resulting impact on the Tranquillity, Dark Skies, and Biodiversity special qualities of the Cotswolds AONB.**

Proposed Lighting & Landscape Impact

It has already been observed in local guidance such as the Bath Heights Strategy that areas of development of increasing height on the university campus (eg. Wessex House) have already *“broken the continuity of the wooded skyline”* (Landscape Setting of Settlements (Policy NE2A) Placemaking Plan Evidence Base, 2015).

As such the impact of further development on landscape character of the WHS and AONB and wooded skyline and potential for cumulative harm is a more serious cause of concern.

The eastern edge of the site incorporates a publicly accessible bridleway which links up with the popular Bath Skyline walk to the south-east of Bath’s urban centre. As such, the university campus should also be considered in relation to how it is experienced in closer-range views by trail users as part of both the more distinctly agrarian, open landscape outside of the City, as well as its relationship with views out towards the WHS.

BPT has become increasingly concerned about the visual impact of the university campus on the landscape setting of the WHS, resulting from increased development, height and increasing intensity of lighting, resulting in light spill and sky glow along the skyline. We therefore take this opportunity to emphasise the need for careful consideration as to how the proposed addition of floodlights on the eastern playing field may contribute to the cumulative, adverse impact to landscape character and value, and the associated OUV of the WHS, contrary to Policy SB19 (C), (D), and (J). **When assessing the potential exacerbation of light spill, we refer to, and support, the comments submitted by the CPRE and the Cotswolds Conservation Board. We highlight the importance of consulting with key organisations and bodies early in the design process who will be best placed to offer further, informed guidance in relation to the impact of increased lighting on Bath’s special landscape qualities.**

It is indicated that the existing floodlights on the neighbouring western playing fields are 15.24m high in the proposed sections (previous application 21/01862/FUL gives their height at 15.2m). It is proposed that floodlights of a matching height would be used on the western extent of the current site (proposed training courts), but the height of the floodlights would increase drastically to 18.3m around the central artificial pitch. It is unclear as to how this increased height has been justified by evidence of need, where 15.24m floodlights are indicated to be used on neighbouring pitches of an approximately comparable scale.

We therefore emphasise our concerns regarding the addition of further floodlights of an increased height on this side of the university campus, which would be of increased visibility from the surrounding area such as the neighbouring Bushey Norwood site. This increase in height also does not account for the proposed, unspecified landscaping and land re-profiling works, where the proposed pitch would be further elevated in contrast with the adjoining land and tree coverage (see in particular Sections A & G). Further detail on the nature and extent of the proposed earthworks must be submitted to allow for a proper assessment of visual impact.

Furthermore, BPT questions the conclusions reached in the Lighting Impact Assessment (LIA) that the proposed development would *“result in a Neutral/Not Significant effect on the surrounding area and the identified receptors, and will not result in an increase in obtrusive light or significantly change night-time views within the AONB”*, based on the *“significant presence of [existing] artificial lighting.”* The impact of increased lighting on wider landscape views is dismissed as negligible in comparison with the effect of existing sports lighting which is excluded from the parameters of this application. However, this fails to account for the cumulative increase of illumination and light spill in mid- to long-range landscape views, and the permanent impact (described as such on p.25 of the LIA) to local landscape character, landscape features and local distinctiveness. As part of the LIA, BPT urges the express consideration of advice contained within CPRE’s Dark Skies and Artificial Light Position Statement.

It is further noted that neither the LIA or the LVA consider impact in relation to the OUV of the setting of the WHS, contrary to Policy SB19 (C): *“In all circumstances development will be assessed to determine the degree to which it affects the significance of the Bath World Heritage Site.”*

In accordance with Policy SB19 (D), *“visual impact must be moderated with a suitable design response including suitable (immediate and longer term) mitigation measures, including any opportunities to enhance the AONB. Impacts on the AONB will need to be evidenced in an LVIA, the scope of which should be set out in consultation with the LPA, Natural England and the Cotswold Conservation Board.”* There is no LVIA included as part of this application. The LVA must be expanded to an LVIA to accord with the requirements of Policy SB19, including the provision of verified views (photomontages or similar) of the proposal in winter-time conditions both in daylight and at dusk when the proposed lighting would be on, and a proportionate assessment of the impact on the identified special qualities of the AONB.

**We maintain the need for further, in-depth consideration as to the degree of impact that the addition of further floodlights on the plateau would have on the setting of the Conservation Area, the special qualities of the WHS Landscape Setting, and the landscape character of the Cotswolds AONB, and how or whether this would be appropriately mitigated.**

Proposed Fencing

Where a 4m timber fence (6m height total including mesh) is proposed to enclose the new artificial pitch, it is indicated that this would be to “reduce light spill and noise” (LVA, p.14). However, considering the 18.3m height of the proposed floodlights, it is unclear as to how the fencing would be an effective measure to mitigate the impact of visible lighting and associated light spill at this height. Existing examples of visible lighting are provided in the Lighting Impact Assessment, such as the floodlights visible over the top of the southern tree belt from the eastern car park (see Figure 6.15). We note that the application does not provide examples of night-time viewpoints from adjacent land such as Bushey Norwood where light spill has been insufficiently mitigated by the adjoining tree belt (this is particularly well-illustrated in the objection submitted by Linda and Isabelle Ficker, 22/12/2022). We therefore question whether the addition of a fence can be considered an adequate mitigation measure against further light spill in this area.

We have further concerns regarding the addition of a fence along the edge of the bridleway and the resulting detriment this would have on trail users by creating a narrow access ‘corridor’ along the edge of the field and restricting public visibility.

Where it is proposed to create a “living wall” across the eastern and southern sections of fencing to soften visual impact and enhance biodiversity, we emphasise the need to robustly build the ‘living’ element into the fence’s design and long-term maintenance, rather than indicating that a standard fence will be allowed to grow over.

Principle of an Artificial Pitch

We recognise that the proposed installation of a synthetic pitch would improve the durability of facilities and minimise maintenance, with the intention of providing a higher-quality sports facility for the local community. However, we highlight growing environmental and health concerns with synthetic pitches associated with the leaching of microplastics, and we question how compatible this would be with the site’s commitment to contribute positively to a campus wide strategy for green infrastructure, landscape, and ecology in accordance with Policy SB19. It further remains unclear as to how the proposed replacement of modified grassland, identified as being of low biodiversity value, with an artificial grass pitch of no biodiversity value, would factor into the overall biodiversity net gain calculations as provided. We trust this will be appropriately considered where relevant by the case officer and ecology officer.

Ecological Impacts and Mitigation

There are considerable ecological impacts associated with the proposals, notably relating to bats in the adjacent Bath and Bradford on Avon Bats Special Area of Conservation (SAC) with both Greater and Lesser Horseshoe Bats dependent upon the SAC and particularly susceptible to even low-level artificial lighting. In accordance with Policy SB19 (J), development is expected to appropriately account for and minimise the amount of *“dusk to dawn illumination on the campus and light spill from the campus”*; **we are not convinced that lighting has been designed to minimise illumination.**

With pole-top luminaire assemblies exceeding 18m, the height matches and exceeds that of adjacent tree canopies and is more than four times the height of the 4m tall acoustic fence. Scan average lux levels are recorded as 211.15 for the 3G pitch within the Training Village and reaching 336 for 04 MUGA 3. This more than doubles the level recommended for training fields and is therefore unnecessarily bright for its intended use.

Recognising that light fittings have been chosen to avoid light spill, the addition of significant new numbers of lights in a previously dark area will add to the overall brightening of the area. Despite assertions that lights will be turned off when not used, bats commute and forage from dusk onwards and will therefore experience disturbance. This site directly adjoins the SAC to the south eastern corner where existing artificially lit playing fields do not.

**The excessive height and number of floodlights would therefore result in additional light spill and increased cumulative luminosity, creating a significant intrusive disturbance to habitats.**

Conclusion

At this stage in the design process, BPT maintains strong concerns regarding the potential for ongoing, cumulative harm to the landscape setting OUV of the WHS and the appearance of the Cotswolds AONB, and potential adverse effect on an internationally protected species and its habitat, contrary to Policies B4, NE2, NE2A, and NE3. It has not yet been adequately demonstrated that development would contribute positively to a campus wide strategy for green infrastructure, landscape and ecology, or that lighting has been designed to minimise dusk to dawn illumination both on and from the campus, contrary to Policy SB19. Where proposals would result in an “unacceptable” level of illumination into the sky, open countryside, or urban areas, this would further be contrary to Policy D8.

**Due to the lack of further information currently submitted as part of this application, we therefore maintain our position with a holding objection and reserve the right to revise our position pending the assessment of further amended documents and drawings.**