

## Application Summary

Application Number: 25/14638/PINS

Address: Cotham School Cotham Lawn Road Bristol BS6 6DT

Proposal: Application for Planning permission for works to install 9 no. floodlight columns around the MUGA and AW pitches at Cotham School with associated planting and works.

[REDACTED]  
Name: Mr James Bibby  
[REDACTED]  
[REDACTED]

Dear Sir/Madam,

I am writing to object to the above planning application.

The application, while appearing small in itself, represents a cumulative increase in development in the area, encouraging and enabling increases in traffic, noise, lighting and impact on nature. The mitigation that has been included has two parts:

- Planting that was already part of a previous application (discharged in 19/00098/COND) and should have been maintained for 10 years – i.e. mitigation that was suitable for a development without lighting.
- Vague plans for inappropriate planting of excessively large evergreen trees on the boundary with no consideration of the impact of blocking natural daylight from residential properties.

As such, there is no suitable mitigation or conditions included for the increases in light pollution, amenity impact or impact on priority species identified in the area (bats).

Bristol's Development Framework Core Strategy states that one of its overarching objectives is "Reducing pollution throughout the city and improving air and water quality, noise and light pollution" (Issue 13 on Page 2). As submitted, the development increases light pollution, and there are no restrictions on times the lighting can be used. It should be restricted to only be periods when the pitches are in use, when ambient light levels require lighting, and curfewed to no more than (preferably less) than the existing pitch use (between the hours of 08:30hrs to 21:00hrs Monday to Friday, 09:00hrs to 17:00hrs Saturdays and not at all on Sundays and Bank Holidays). If the application is approved, I would like to see this time restriction as a permanent condition. This would be relevant under National and Local Planning Policy 7.1 NPPF Paragraph 198C which states that decisions should: "limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation". Conditioning the hours to the minimum possible would be relevant on both local amenity and nature conservation grounds.

The impact on the proposed planting scheme has not considered the overshadowing impact on the neighbouring properties. To mitigate light from floodlights it has been proposed to plant non-native evergreen trees that can grow over 20-30m on or near the boundary (holm oak (*quercus ilex*) and Monterey Pine (*pinus radiata*)), permanently blocking daylight to neighbouring properties. Tall trees block light for a distance multiple times their height, especially during winter periods when the sun is lower in the sky. The planting scheme needs to be revised so that if any screening trees are included they are significantly further from residential properties and

of a reasonable height. I have no objection to the native hedge, however I would like to see a condition that it is maintained for a further 10 years and that this is enforced. The school already has a planning condition to have planted this hedge and it should have been maintained as per the planning decision 19/00098/COND. This has been previously subject to an enforcement enquiry but there is still no hedge.

Bats and their habitats are protected under the Wildlife and Countryside Act 1981 and The Conservation of Habitats and Species Regulations 2017, any development that could adversely affect their foraging areas must be carefully scrutinised. It is unclear whether the included ecological appraisal adequately considered the impact. The playing fields represent one of few open greenspaces in the area and are clearly used for foraging and it is acknowledged that "Artificial light spill is known to have adverse impacts on bats and their prey" which is stated in the ecological appraisal. Also, the school installed 4 bat boxes as part of discharging a previous biodiversity action plan which were to be maintained for 10 years (19/00098/COND). There is no reference to the bat boxes in the bat survey submitted and these would be a potential roost in the near locality. It is important that this discrepancy is formally clarified to ensure that the planning authority can demonstrate that they have been presented with the correct and full information to be able to consider the impact on this priority species as required by law.

In summary, the school has presented a large number of complicated, confusing and contentious planning applications over the past 10 years, each incrementally increasing noise and light pollution and impacting biodiversity. This application represents a cumulative increase in development with associated amenity and nature conservation impacts with no suitable mitigations proposed. In light of the above, I urge the planning authority to reject the application based on:

- Evidence that the bat survey has omitted to survey or mention bat boxes on the property that have been built specifically for the purpose of providing roosts for bats
- Cumulative amenity impact has increased over the past 10 years and no mitigation for these impacts is included
- The applicants previous disregard for planning conditions leading to enforcement enquiries
- Inappropriate mitigations that will cause significant other harms to residents in the form of overshadowing if not reconsidered

Yours sincerely,

James Bibby