

Our Ref: DMJ-WR05-12424B
Your Ref: **15/01171/FUL**

5th November 2015

For The Attention of Martin Chandler
Cheltenham Borough Council
Municipal Offices
Promenade
Cheltenham
Glos.

Dear Mr Chandler

Re: Cheltenham Ladies College Health & Fitness Centre - Sports Hall Extension and Floodlighting - Your Ref: 15/01171/FUL

I write in connection with the above referenced Planning Application. As you will be aware the application was deferred at our request pending consideration of late neighbour representations.

The college and their Design Team considered there was insufficient time to provide a full response prior to the October Planning Committee Meeting and thus to ensure that both local residents and Members are fully informed, the decision was taken to defer the application for determination at the Committee Meeting on 19th November.

The two primary matters upon which we considered further input was required may be summarised as follows:-

1. Whether the lighting lux levels proposed for the Astro pitch are appropriate having regard to the recommendations of the relevant sports Governing bodies, and whether the light source should be changed to LED light emitters.
2. Respond to neighbour's allegation that the Astro pitches (both non-lit and floodlit) are not currently used to full capacity

In response to the above I herewith submit two further documents, the first comprises of an updated Report from Neil Johnson, Sports Lighting Consultants Ltd, this provides further and fully explanation of the recommended lux level for the proposed floodlit pitch; and secondly a letter from Cheltenham Ladies' College further expanding upon the timetable and use of the Astro pitches and sports field as a whole.

In terms of commentary upon the attached I also offer the following additional comments:

The neighbour's Lighting Consultants Report criticised the lighting design on the basis that:-

1. The proposed lighting level proposed is excessive.
2. The design assumed a higher level of use class than actually required.
3. LED lights will provide a better lighting solution.

The Lighting Consultant has dealt with the majority of these points within the lighting design, however I would comment as follows:-

I have some sympathy with neighbouring residents in trying to ascertain from public information exactly what lighting level is appropriate for a given use. Indeed, the various guidance documents do lack consistency.

In our further research however, advice has been taken from the FIH (international Hockey Federation) requesting that they confirm which guide should be adopted in this instance. Their advice is clear, that whilst the FIH guidance is worldwide, floodlighting should be designed in accordance with the national body within each country.

The applicable national body in this location is England Hockey, for Class iii use 300 lux is recommended and it is this recommended lux level that the lighting design has been specified.

It is true that 300 lux falls below the required minimum illuminance level for tennis (LTA recommend 400 lux for playing area), however, CLC are content that for the tennis practice undertaken under floodlighting 300 lux will be adequate in this instance.

Notwithstanding all of the numerous comments made about the lux levels upon the playing surface, I submit that it is entirely open to the applicant to decide what lux level is appropriate for the activities undertaken. The appropriate planning consideration is **not** therefore the proposed lux level upon the playing surface; the correct planning consideration is the impact of the lighting

columns, the visual impact of floodlighting the pitch and the light spill beyond the site boundaries.

The neighbour's Lighting Consultant has not criticised the light spill levels and, as you will be aware, these are well within recommended maximum spill levels for a "rural" location. Indeed you will note within the Lighting Consultant's Report that the definition of the various environmental zones are included within Page 3 (Table 1).

Taking a precautionary approach, the lighting design has been based upon an E2 Rural Zone, i.e. village or relatively dark outer suburban location. In reality the zoning is closer to the Suburban E3 Zone, namely small town centres or suburban locations.

As stated however, we consider it is entirely appropriate to design to the lower luminance levels set out under Zone E2 and in this instance with the proposed lighting level set at English Hockey standards for class iii use (300 lux) the building luminance pre-curfew falls below the recommended 5 lux level required for an E2 zone.

Finally, in respect to lighting, the neighbour's Lighting Consultant has suggested that LED lighting would improve performance. This statement is inaccurate insofar as whilst acknowledging that LED lights may be switched on and off instantly and illuminance levels do not decay over time, the number of lights required is greater for the same level of pitch illuminance and the out-spill from LED lights is significantly higher than comparable metal halide lights.

The primary design driver in this instance has been to reduce light out-spill whilst achieving the required level of pitch luminance and in this respect the metal halide lamps with back shield allow for the lowest number of lamp fittings with the lowest light out-spill whilst achieving the required pitch illuminance.

Turning to the second issue, I attach further justification prepared by Cheltenham Ladies' College providing an explanation as to the needs and requirements of the College and details of the actual pitch usage.

The College has no wish or desire to waste money on facilities which are not required and I consider that the attached further representations clearly sets out why the additional floodlit pitch and sports hall are required. The attached CLC letter should obviously be read together with the CLC Justification Statement previously submitted.

It is understood that CBC are engaging an independent Lighting Consultant to review the College's Lighting Consultant's report and recommendation. CLC welcome an independent review of the lighting scheme.

If there are any other outstanding items upon which you consider further commentary or input is required then please do not hesitate to contact me.

Yours sincerely

For and on behalf of Evans Jones Ltd

A handwritten signature in black ink, appearing to read 'D Jones', with a stylized flourish underneath.

**D M Jones MRTPI MRICS
Chartered Town Planner
Chartered Surveyor
Direct Line 01242 531411**

Enc:

- Neil Johnson Lighting Design report SP1048/3 05/11/2015
- Cheltenham Ladies' College Letter 05/11/2015