



**Development Control Committee B – 29 April 2015****Application No. 14/05030/F: Gloucestershire County Cricket Club Nevil Road Bristol BS7 9EJ****ADDENDUM REPORT****BACKGROUND**

Members will recall that this application was considered at the B Committee Meeting of 4<sup>th</sup> February 2015 when the resolution was to defer subject to a site visit and receipt of further information to consider alternative options.

Following the deferral, the applicant has submitted a report to review alternative design options and include details of a floodlight usage management plan. This new 'options report' is attached at Appendix 1, and the previous Committee report is attached at Appendix 2.

**OPTIONS REPORT**

The report sets out further details of the benefits of the proposed floodlights to Bristol and the Club's business case and reviews alternative design options. These include the number of proposed floodlights to be installed, types of floodlight design, cost and efficiency of various floodlighting schemes and their performance in order to meet the required England and Wales Cricket Board (ECB) and International Cricket Council (ICC) lighting standards.

**BENEFITS**

The key benefits of having the floodlights are listed as follows:

The economic impact – the City receives at least £1 million from each major international match hosted

Bristol would be able to host four Cricket World Cup matches in 2019, enhancing the City's profile and reflecting the multi-cultural nature of Bristol.

Having permanent floodlights also greatly improves the likelihood of the Club being granted international cricket more frequently.

The Club works with local charities and community groups including local schools, as well as supporting local clubs and institutions, all funded directly from the Club. To maintain the current level of funding the floodlights are required for the increased revenue they bring. Without the additional revenue it is uncertain whether the current level of community work can be sustained.

In addition to the economic, city profile and community benefits, the floodlights would allow for later start times, allowing more time for people to access the Ground especially after working hours. This supports one of the three dimensions to sustainable development identified in the National Planning Policy Framework, to perform a social role: *"Supporting strong, vibrant and healthy communities ... that support its health, social and cultural well-being"*.

**BUSINESS CASE**

The cost of the proposed solution is circa £1.1 million. The ECB has agreed to provide a fixed grant of £700,000 towards the cost, and the Club can secure the additional £400,000 if planning consent is secured on the strength of the potential revenue they would receive from the international matches and increased attendance for domestic T20 matches. The Club has no realistic additional funds available.

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The Club is primarily dependent on international cricket to trade a surplus. At least half of the planned international fixtures would be lost in the period 2015-2019 if the Club failed to secure permanent floodlighting.

The Club has one of the lowest cost bases in County Cricket and is good at controlling costs but with no cash reserves and circa £4m of debt to manage its sustainability and survival would be in doubt without regular international cricket and enhanced crowds for domestic matches. There is a possibility of a relocation should international cricket be lost or significantly reduced.

If floodlights are not installed Bristol would lose the 4 Cricket World Cup matches that have been awarded to the Club following a city-wide bid process which had support from the Mayor's office, the Bristol Sports commission, the City Director's office and a wide section of prominent educational, sporting and business establishments across the City. Bristol would also be unable to host any other ICC World tournament events to be staged in England and Wales, such as the Women's Cricket World Cup in 2017. This will lose important revenue and profile for the City and put the Club in financial jeopardy.

**PROPOSED SOLUTION**

The report details that the proposed solution follows a detailed review of all available options and consultation with technical specialists, Council officers and the local community both prior and post the deferral. Three separate light engineers have independently arrived at the same 6 pole solution as the optimum choice with the masts in the same positions and the same heights as that proposed. The ECB has advised that a 6 pole option is the optimum solution for the Ground and the ICC guidelines require a minimum of 6 poles in order to host ICC sanctioned competitive cricket matches, which includes the World Cup.

**THE FINAL PROPOSAL INCLUDES**

- 6 no 45m high floodlights
- A rounded head frame in place of the previous rectangular head frame following requests from local residents. (Amended plans showing this alteration are appended to this report.)

In addition there would be earlier programmed starts to T20 matches ensuring that all T20 competitive matches should be completed by 22:00 (21:15 is the scheduled finish time).

**ALTERNATIVE OPTIONS REVIEW****Option 1: Retractable Floodlights:**

These could be reduced to a minimum of no lower than 18 metres due to the size of the heads (8m width). This would reduce the visual impact on longer views but would increase the visual impact from shorter views, obviously including adjoining residents.

The diameter of the poles would increase from 1.2m to 2.0m and the foundations would have to be larger.

In terms of cost, halving the height essentially doubles the cost. The ECB would provide no additional funding so the Club would need to find an additional £1.3 million which it cannot afford. For reasons of cost and impact on nearby residents this option has been discounted.

**Option 2: Removable Head Frames:**

The process of removal and re-installation would be expensive and complicated. Each removal and re-installation would cost approximately £40,000, not including the cost of storage off-site. Due to

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additional wearing caused by the removal process, the Club would lose the manufacturer's warranty which also has cost implications. The life expectancy of the lights would also be reduced, requiring more frequent replacement, again at additional cost. The Club is forecasting an increase of c £40 a year in gate receipts relating to domestic T20 matches and this would be effectively negated. Given the costs and difficult practicalities involved this option has been discounted.

**Option 3: Four Floodlights in place of Six:**

This option would be an improvement for residents of Kennington Avenue in terms of visual amenity, however, it could increase light spill to the dwellings due to the increase in height and headframe required for the remaining lights. To meet the standards of the ECB the masts would have to increase in height by approximately 10m and the headframes would also be increased in size. This would have an increased impact on longer distance views to the Ground. The ICC does not accept the use of a 4 mast solution for their fixtures due to the compromised light efficiency and consequent failure to meet the required standards. This option has been discounted because it does not meet ICC guidelines and would have an increased visual impact on the City skyline.

In addition the ECB has stated that their recommendation would be to progress with a 6 mast solution on the basis that they could be physically accommodated within the constraints of the site, the playing area lighting quality would be far superior to that of a 4 mast solution, glare control and uniformity should be better, masts can be shorter and light spill reduced and better controlled. The ECB add that the 6 mast solution is the optimum one for the venue and is the only one the ECB would support at this time.

**Option 4: Four Retractable Floodlights:**

This would in part resolve the impact on the longer views when they are lowered, However, a 4 mast solution would not be supported by the ECB and is not acceptable for any ICC fixtures. In terms of cost, this would be similar to a 6 pole retractable scheme (see Option 1) due to the additional height and would not be commercially viable.

**Option 5: Retractable Floodlights and Removable Heads:**

For the reasons explained above this is not a feasible option.

**Option 6: Use of Eight Floodlights instead of Six:**

This would achieve the required light levels but would increase the visual impact due to additional clutter. Due to the size and constraints of the Ground the 8 poles could not be arranged in a sensible configuration.

**Option 7: Repositioning the Floodlights:**

Following advice, the proposed locations are the optimum solution in terms of minimising light spill and maximising efficiency, with the exception of mast P2 which has been relocated slightly further away from a nearby resident on Kennington Avenue. In terms of practicalities, cost and achieving the necessary lighting requirements, there is very limited scope to move the lights to reduce their impact.

**Option 8: Use of Temporary Floodlights:**

Although these have been used in previous years, the ECB have updated their requirements and now will not permit the use of temporary floodlights. The funding of the lights and granting of the games will only be provided on the basis that the floodlights are permanent.

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Option 9: Base Hinged Masts:

Base hinged masts are designed to fold over for short periods for maintenance or to avoid hurricane damage. For the majority of the year the masts must remain vertical. However, due to the constraints of the Ground the masts would not be able to fold in a satisfactory manner and would have to lie over the pitch, potentially damaging it and the lights, and preventing any use of the pitch during this time. For these reasons the option has been discounted.

Option 10: Lowering Head Frames:

The Club has reviewed the possibility of using lowering head frames via a winch type system. However, the number of bulbs required to meet ECB and ICC light level standards would result in head frames of such weight and size that lowering and raising them would be impossible. This design is only used for smaller and lighter head frames than those required for cricket.

## CONCLUSION

The report concludes that the evidence provided in terms of light spill, light efficiency, achieving the required lighting standards, short and long visual impacts and practical possibilities establish that the 6 pole option is the optimum solution. This is supported by the ECB and its independent lighting engineers.

In addition, Neil Johnson, an independent lighting consultant, was commissioned by the Club following recommendation from local residents. His review of the proposals confirmed that the design solution followed a rigorous investigation, proposed heights to provide optimum performance whilst minimising light spill, and used principles acknowledged as best practice by the lighting industry.

## FLOODLIGHT USAGE MANAGEMENT PLAN

This is a management plan detailing use of the floodlights in respect of times, frequency and maintenance as well as procedures to ensure ongoing communication with local residents.

The report states that the Plan is based on conditions recommended on the previous Committee report and following feedback from consultation with local residents.

## TIMES AND FREQUENCY OF USEAGE

The floodlights would only be used for competitive cricket matches on 15 occasions per year unless otherwise agreed with the Local Planning Authority (LPA).

The lights would not be used earlier than 10am and would be switched off as soon as practicable after a match, and no later than 11pm unless otherwise agreed in writing with the LPA.

At the end of play, the level of light will be reduced so that only 10% of the bulbs on each mast are used.

With the exception of televised matches, the lights shall be fully switched off within 30 minutes of the end of play and no later than 11:00pm.

Those matches that are televised would be subject to the same terms other than the 'reduced' lighting will be allowed at 50% through to 11pm from the end of play to allow for de-rigging of television equipment.

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The floodlights would be used for domestic and international Twenty20 (T20), 50 over matches (including World Cup matches) and as a 'top-up' for completing 4 day/test matches prior to 7pm if required.

The floodlights would be used at ECB light level requirements for all domestic matches and ECB sanctioned international matches. The floodlights will only be used at full capacity to ICC light level requirements for ICC sanctioned international matches, such as the World Cup.

Evening T20 Domestic Matches: The start time would be 6pm with a scheduled finish of 9:15pm. Play can be extended to 10pm in the event of rain.

Day/Night 50 Over Matches: The start time would be 2pm with a scheduled finish of 9:45pm. All matches would be concluded by 10pm.

4 Day Matches: The floodlights would only be used in a 'top-up' capacity for bad light when matches are close to a 'result' (i.e. not a draw) in their final day of play. The decision whether to use them would be taken by the umpires on the day and the lights switched off by 7pm.

These are the main points concerning the use of the lights. The report also includes details concerning maintenance, initial testing and checking.

#### CONSULTATION WITH LOCAL RESIDENTS

A small group of local residents who have expressed concerns have been directly consulted in the production of this Plan.

Notification: The Club will provide written information delivered to local residents prior to the end of March in any year indicating which matches will be played under floodlights and their start times. Details on whether the matches will be televised and whether the lighting will be to ECB or ICC requirements would also be provided.

This information would also be displayed on notice boards at either entrance to the Ground and placed on the Club's website.

For the knockout stages of tournaments the same provisions will be made to advise local residents not less than 48 hours in advance of a match.

A complaint procedure is also in place should any issues arise concerning use of the floodlights.

#### RESPONSE TO PUBLICITY AND CONSULTATION

Re-consultation letters were sent to local residents and businesses that surround the site on 24<sup>th</sup> March 2015 with an expiry date for receipt of comment of the 14<sup>th</sup> April 2015.

At the time of writing the report, 52 comments had been received; 20 objections and 32 in support.

#### PUBLIC CONSULTATION COMMENTS

Comments on the Alternative Options:

- The only option that will go some way to reducing their unsightly presence in this conservation area is to have them lowered each season. Bristol might break new ground in commissioning a new version of hinged lighting columns that would have paved the way for a new approach

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to such developments in sensitive and densely populated urban areas. [The use of base-hinged masts has been discounted as a viable solution in the Options Report.]

- Temporary options should be supported, as this will allow local people to have a good living environment, whilst allowing the cricket club to do what they need to show one international per year. [The use of temporary floodlights has been discounted as a viable solution in the Option Report.]
- GCCC appear to be relying heavily on the cost of alternatives as a reason for discounting them. Simply because a better alternative will cost more is not an appropriate reason for GCCC to reject it, particularly when these structures will become a permanent and prominent feature of the Bristol skyline. [See Key Issue 1.]
- GCCC should be granted planning permission for 4 not 6 floodlights. This appears to have been rejected on the basis that it is not recommended by the ECB/ICC. However, the key and historic international cricket grounds in the country are equipped with 4 lights (Lords, Old Trafford, Headingley and the Oval). [The appropriate solution for each ground is dependent on the characteristics of the individual site. A four mast solution would not meet ICC standards and would not be supported by the ECB at the Bristol Ground.]
- The club has dismissed removable lights on the permanent poles because of cost but the cost could be met through income generated from international matches.
- While I am encouraged that the Cricket Club sought advice from the alternative lighting supplier (Abacus) and an independent lighting engineer (Neil Johnson) I am concerned that their remit may have been to validate the previous proposals rather than to genuinely explore other options instead of permanent fixed masts.
- I remain unconvinced that the mast heads removed out of season, or base-hinging masts are non-viable options. If the application were refused or deferred again these would have to be fully explored.
- An alternative solution suggested by the residents group Howzat GCCC is based on a mast which hinges near its base to lie flat out of season. It is argued that there is no engineering reason why the masts could not be left in the horizontal position, provided they were supported at intervals along their length. The lighting arrays could then be covered to protect them during the winter. Whilst it may be that some masts would be easier to accommodate than others, with some minimal relocation, all could theoretically be lowered to lie in directions that still permit circulation and don't cover the playing surface. The Howzat GCCC group have also amended the Options Table from Appendix 8 of the Options Report.

[The applicants have submitted a detailed response to the suggested solution put forward by Howzat GCCC which also covers the inserted comments from Howzat CCC into the Options Table. The full submission from Howzat GCCC and the response from the applicant are shown at Appendix 3 of this report.]

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## COMMENTS MADE ON THE FLOODLIGHT USEAGE MANAGEMENT PLAN (FLUMP)

The FLUMP conditions should be amended to read as follows:

Any televised game should be concluded at 22:30 and concluded at 22:00 for non-televised fixtures.

- (a) With the exception of those areas designated for hospitality use, all public bars and catering outlets should close at the completion of play or 22:00, whichever is the later, (other than for the purpose of cleaning / maintenance) and that spectators (other than those in hospitality areas) will simultaneously be asked to leave the ground.
- (b) A Travel Plan should be presented at committee and should deter spectators from driving to the ground without a pre-agreed car parking permit or pass. In addition, all match day spectators (bar those with car parking adjacent to the Grace Gates) will be supplied with the postcode (for satnav or other use) for the entrance adjacent to College Mews at the Ashley Down Road entrance. [Traffic Management is not part of the FLUMP. However, a planning condition requiring an updated Traffic Management Plan is recommended.]
  - All lights should be permanently switched off by 22:30 to reduce the impact on the local community. - The lighting levels purported to be monitored again remains unclear and must be clarified for effective monitoring to take place.
  - Although there has been some progress towards clarity over the usage and operation of the floodlights in the production of the Floodlight Usage Management Plan (FLUMP), with some minor concessions over hours of operation, the investigation of options for mitigating the permanent daytime impact of the lighting masts and floodlight arrays has fallen well short of expectations. [The FLUMP is discussed in Key Issue 2]
  - I would like to see the club submit a plan which is not just the best option economically but more importantly an option which takes into account the concerns raised by the local community. The argument that the club has no money is weak and irrelevant to the planning submission. If this argument is valid then anyone could build anything. I would request these plans are rejected and that the club reviews alternative retractable lights similar to those used at Lords. [See Key Issue 1.]

## OBJECTIONS TO LIGHTSPILL / HARMFUL IMPACT TO RESIDENTIAL AMENITY

- Light pollution. The game should be played in daylight hours only.
- There are no further changes suggested to reduce light spillage to neighbouring properties so it is assumed it remains significantly above ECB recommendations, rendering local houses uninhabitable during floodlit matches. [Light levels would vary depending on whether the matches had to meet ECB or ICC standards.]
- The location of floodlight P2 cannot be moved further away from residential properties due to the impact on seating and yet no analysis of the loss of seating has been conducted. [The impact on amenity from the positioning of floodlights was assessed within Key Issue B of the previous Committee report – see Appendix 2.]



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- Compliance with the Floodlight Usage Management Plan (FLUMP) should be a condition of any planning consent to protect local residents. [It is recommended that the provisions of the FLUMP are included in the planning conditions.]
- Regardless of the change to the lighting heads there is still going to be shadow cast from the structures. [The impact of shadow cast by the floodlights was assessed in Key Issue B of the previous Committee report.]
- Concern about the possible reflection from the structures when the sun hits them at certain angles. There is already a problem from the sun reflecting off the flats at certain times of the year.
- The matter of light spillage has not been adequately addressed in the report. The impact of light spillage should be explored further. [The issue of light spillage was considered in Key Issue B of the previous Committee report for the proposed floodlighting design. The Options Report mentions that the four mast option would result in greater light spillage.]
- GCCC have failed to grasp that they are situated in an inner city urban area, completely surrounded by densely populated residential streets and a conservation area.
- The light spill to neighbouring properties is still not acceptable. While ICC lighting levels at the pitch are 20-30% higher than ECB standards, at some properties the light spill projected is 16 times the ECB recommendations. The estimates 320 lux level on neighbouring roads is equivalent to internal office light levels. This is unacceptably high and the club has not done enough to address this.

**OBJECTIONS TO THE VISUAL IMPACT OF THE PROPOSAL**

- Permanent floodlights will tower over the surrounding area and be an eyesore which will spoil the skyline. [The impact on visual amenity was considered in Key Issue C of the previous Committee report.]
- Floodlights will be unsightly and blight the residential neighbourhood.
- Erecting 6 enormous permanent metal structures in this area will be highly detrimental to the environment and is inappropriate in this urban setting.
- The skyline has already been negatively impacted by the addition of flats. The overall size and permanent nature of this development will worsen the impact.
- Floodlights will change the character of the area.
- The club maintains that retractable lights would have a greater visual impact from ground level, but the drawings provided do not offer an adequate visualisation of this, and do indicate where shade will fall on neighbouring properties from lighting of different heights; this prevents a fair comparison from being made.
- The Council's own Landscape Department says the proposed development will 'cause substantial harm to the Ashley Down Conservation Area and should be refused'.
- The computer generated images, as included with the new information, do not give an accurate impression of how the floodlights will impinge on the skyline. Although they are steel they will look dark silhouetted against the light sky.

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- The floodlights will lead to more activities in the area at night which means more people, more noise and more congestion. [Noise/Disturbance was considered in Key Issue B of the previous Committee report.]

**Traffic/Transport Issues**

- There should be more detail of robust traffic and crowd management measures to ensure the impact of crowd disturbance is minimised. [Transport implications were considered at Key Issue E of the previous Committee report.]
- GCC have continually stated that they have paid the Council for traffic control, but there is little evidence of this, as the operatives who are on control have no idea who is actually a resident/neighbour and consequently let anyone through who says they live in that particular road.
- There is no clear plan in place for reducing the impact of traffic/transport.

**Other Comments/Issues Raised**

- Most supporting comments posted are from individuals who live well outside the ward (and neighbourhood) or whom would not have to live or experience the ramifications of fixed 45m floodlights.
- The lights will consume large amounts of electricity at a time when we are seeking to reduce carbon emissions.
- It is acknowledged that GCCC has sought some alternatives to their floodlight plans, however, all new ideas seem to come with caveats that indicate an inevitable return to their original plans.
- It is important that there is a balanced relationship between GCCC and its immediate neighbours. If GCCC state economic challenges with other options then perhaps the wider issue is viability of its own business model and the restrictions to operate within inner city neighbourhood.
- Virtually nothing has changed from the previous application.
- The main reason put forward by GCCC for these floodlights is financial, which should not be relevant to planning decisions.
- At a time when Bristol has been awarded European Green Capital is this really the legacy the club wants to leave behind for 2015? Is this option really the best for the environment, landscape and local community? I believe that Bristol should be striving to set standards for other countries to follow not simply choosing the cheapest option to permanently scar our landscape.
- Much emphasis is placed on the economic benefits to the City of the club hosting floodlit international or T20 matches. Whilst there may well be an economic benefit, the extent of that benefit is not proven.

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## SUPPORT COMMENTS

## Benefits to Bristol/Wider Area

- Bristol has had a lack of top class sport for decades. If International cricket was prevented it would lead to a considerable loss of income to the city and a lost opportunity to highlight Bristol to the rest of the world.
- The additional events and fixtures made possible by their arrival of the floodlights can only add to the prestige, vibrancy and commercial success of the Club, the local area and the whole city.
- Bristol is the only place that anyone can hope to watch major international sport in the South West of England.
- Too often the Bristol area has been held back either through funding or planning objections, we are a big city and deserve the top sport and recreational facilities and functions that go with it, we've had a taste of International cricket and it's fantastic, let's make sure we keep it and move forward.

## Support from/for the Local Area

- As a resident in the flats at the County Ground I support the application. The use of the floodlights is only for a few occasions during the year and is important to maintain the vitality and offering of the County ground. It is important for the area and for the City that cricket is played there and the operation is commercially viable. The proposal will help with this and the impact locally will be minimal.
- I chose to live here knowing that a major ground was nearby, and wish to embrace a development that I feel will be beneficial to the area as a whole.
- We all choose to live near a sporting venue and must accept that as a result sometimes our private lives will be inconvenienced. That is not a valid reason to object to this proposal given the number of games that will be played at night is so low.
- Visitors are more likely to visit the wide range of shops, restaurants and pubs along Gloucester Road, thereby improving the local economy.
- The cricket club have made significant efforts in recent years with local businesses and schools. It would be a great shame if we were to lose the opportunity of hosting international sporting events in our own community.
- As someone growing-up in Horfield, I know that the opportunity to watch the best players perform in my own local area was a great inspiration and helped to encourage my participation in the game.
- Permanent lights would avoid the inconvenience to local traffic of having to bring temporary lights when a day/night fixture is scheduled.
- The floodlights would allow domestic cricket to start a little bit later in the evening, which would help ease traffic along the A38.
- Traffic congestion is as a result of residents owning too many cars. The flood lights will help the cricket club to spread this traffic congestion by starting games outside the 'rush hour'.

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- The possible disadvantages of the floodlights are minor compared with the advantages of having a major sporting facility in this part of Bristol.
- It is disappointing that a decision is still yet to be made. This is all too typical of a council that does not appear to understand the socio-economic benefits that professional sport can bring to a city.
- The latest additional information comparing the options for the floodlights make the case for approval very strong.
- People who buy houses next to railway lines, sports stadia, roads and the like should not be surprised when there are planning applications to invest in them and bring them up to current day standards.
- If the club does not get floodlights (and thus loses international cricket) the club will certainly sell the ground and move – if that happens the land will be developed for retail or residential use which will have a far greater impact on the local area than half a dozen games of night cricket.
- The new designs of the head frames are an improvement on the previous design, the traffic management plan will assist with the parking difficulties and planning should be approved. It would be wrong if this proposal is rejected on the basis of the very small number of residents.

**POLLUTION CONTROL**

Following the receipt of further information, the original comments remain valid however the suggested conditions should be amended as follows:

1. Prior to the first use of the floodlights for competitive cricket the lux levels, for both vertical and horizontal illuminance, shall be checked against those on the Predicted Overspill Footprint Drawings (140615H 26 November 2014 Vertical & Horizontal lux). Lux levels shall be checked at the boundary of the Gloucestershire County Cricket Club Ground and at any other reasonable location within 50 metres boundary of the Gloucestershire County Cricket Club Ground as requested by an authorised officer of Bristol City Council Pollution Control Team. For the avoidance of doubt, the floodlights shall only be checked between 10.00 hours and 23.00 hours.

If the lux levels are 5% above those on the Predicted Overspill Footprint Drawings then appropriate mitigation measures shall be carried out in agreement with an authorised officer of Bristol City Council Pollution Control Team.

2. The floodlights shall be used on no more than 15 days in any calendar year.

3. The floodlights shall not be used between 23.00 hours and 10.00 hours.

4. Apart from essential maintenance the floodlights shall only be used in connection with competitive cricket matches.

5. Floodlight Usage Management Plan

(i) The Floodlights shall only be used in accordance with the Floodlight Usage Management Plan submitted with the application. Any proposed amendments or revisions to The Floodlight Usage Management Plan shall be submitted to and approved in writing by the Local Planning Authority.

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[The original comments contained in the previous Committee report are as follows:

“It would be usual for the Environmental Protection Team to assess any application for external lighting in accordance with the guidance given in Obtrusive Light Limitations for Exterior Lighting Installations in table 2 of the Institute of Light Engineers Guidance Notes for the Reduction of Obtrusive Lighting, GN01:2011 (ILE Guidance). This document suggests maximum obtrusive light limitations for exterior lighting installations for different locations from protected dark areas to sub urban and urban surroundings and suggests light levels both before and after 23.00 hours. The most relevant measurement within the ILE guidance is the vertical illuminance in lux on windows. The ILE Guidance suggests a maximum level to avoid obtrusive light of 25 lux in an urban surrounding before 23.00. It must be noted that the ILE Guidance is intended to be used for lighting likely to be used every day as opposed to the lighting here which would only be used during the cricket season and for a restricted number of times. A higher level may be acceptable to local residents than the levels suggested within the ILE Guidance.

In addition to the ILE Guidance the England & Wales County Cricket Board (ECB) has also published Guidelines for Floodlighting of Cricket Pitches. Whilst this document is largely based on lighting levels for the field of play it does give in section 7 Environmental Analysis levels that in the absence of local guidelines, the following levels should be used for design – within 50 metres of the ground 40 lux maximum vertical and within 200 metres of the ground 20 lux maximum vertical.

The highest predicted light levels for the proposed floodlighting scheme will be at properties of Kennington Avenue (75-127), which back onto the north west side of the ground. The light levels at the rear facades of these houses is predicted to range from around 60 lux to 320 lux. The fronts of the houses on the opposite side of Kennington Avenue (66-122) range from about 32 lux to about 140 lux. Light levels then reducing the further you get from the ground. The predicted light levels from the floodlights at the majority of these properties is above the recommended levels from both the ILE and the ECB guidance documents.

Due to greater shielding from buildings the predicted light levels in Kennington Avenue are significantly lower with the highest predicted levels being at the front of the properties of Kennington Avenue which do not back on to the cricket ground. Here levels in the region of 50 to 60 lux are predicted. These levels are still above the recommended levels from both the ILE and the ECB guidance documents.

The predicted light levels for the floodlights submitted by the applicant show that at the nearest residential properties to the ground at Kennington Avenue and Lancashire Road that horizontal light levels will be above those recommended by the ECB for properties within 50 metres of the ground and at some properties of Kennington Avenue vertical light levels will be significantly above the levels recommended by the ECB. Vertical light levels at properties with 200 metres to the north west and south west of the ground will also be above the vertical light levels recommended by the ECB. The properties immediately to the north west of the site will be particularly well lit.

I understand from the applicant that the numbers and positioning of the floodlights is the most effective from the point of view of minimising the overspill of light from the floodlights to nearby residential properties. I also understand that there are a number of other cricket grounds in residential areas around the country where floodlights will be used.

Temporary floodlights, which would give a greater overspill of light than the proposed permanent lights, have previously been used at the ground without cause for significant complaints from local residents.

Whilst I feel it is inevitable that local residents properties, particularly those to the north west of the ground, will be lit by the lights the number of times that the lights will be used will be restricted and the lights will only be used during competitive cricket matches and switched off when cricket matches

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finish and no later than 23.00. The lights will only be used during the cricket season, generally April to September. Sunset in April and August is usually between 8 pm and 9.30 pm falling to 7 pm by the end of September. To try and put the level of predicted lighting in to some sort of context sunrise or sunset on a clear day is said to be around 400 lux, a winter's day, overcast sky 900 - 2,000 lux and a summer's day, clear sky up to 100,000 lux.

If this application is granted I feel that the use of conditions to control the use of the floodlights will be of utmost importance in order to try and minimise the effect of light from the floodlights on local residents. From documents submitted with the number of times the floodlights will be used varies from 10 to 20 matches per year. Looking at planning consents for floodlights at Sussex, Northants, Chelmsford and Leeds planning permissions have restricted the use of the floodlights to between 15 and 20 times per year with lights having to be switched off by between 23.00 and midnight.

I would therefore suggest the following conditions, or variances of, should the committee be minded to grant the application:

1. Within 1 month of the commencement of the authorised use hereby approved a report detailing the illuminance levels at neighbouring residential properties shall be submitted to and approved in writing by the Council. If the illuminance levels at neighbouring properties are above those predicted on the Predicted Overspill Footprint Drawings for both vertical and horizontal illuminance submitted with the application then a further report detailing mitigation measures shall be submitted to and approved in writing by the Local Planning Authority and the approved works shall then be completed in full within a month of the approval.

2. The floodlights shall be used on no more than 15 days in any calendar year.

3. The floodlights shall not be used between 23.00 hours and 10.00 hours.

4. Apart from essential maintenance the floodlights shall only be used in connection with competitive cricket matches.

5. Floodlight Usage Management Plan

No use of development shall take place until there has been submitted to and approved in writing, by the Council, a Floodlight Usage Management Plan. The plan shall set out details of:

When and what games the lights will be used for.

The times when the floodlights will be used.

When and how the lights will be turned down to a lower setting.

When and how the lights will be maintained and tested

How local residents will be notified as to when the lights will be used.”]

CITY DESIGN GROUP

The case for approving the floodlighting proposals is made within the supporting document entitled NPPF Heritage Statement, section 7 Impact Assessment notes that the key test of whether the proposed floodlights would have an adverse impact on the Conservation Area and the Listed buildings is thus to what extent they will affect the landmark qualities of the Listed buildings in the wider landscape, and to what extent any change to these qualities will harm or enhance the heritage significance of the Listed buildings and the conservation area.

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The argument given is that although from important viewpoints the floodlight masts appear above the listed buildings within the Ashley Down Conservation Area, substantial harm does not arise because the buildings remain in their prominent location; the floodlights serve to direct attention of viewers to them. The issue of less substantial harm caused is then measured against any benefits arising from the proposal. This cannot, however, be the case. If the prominence of the listed buildings is the one of the most important factors in the creation of the Ashley Down Conservation Area, the greater prominence given to the floodlights that rise above the buildings must reduce the significance of the latter by substituting their landmark role. The term prominence refers to a quality that cannot be relative in this context. There might be some merit in the argument that new structures could draw attention to existing buildings if they complimented them, but the floodlights are entirely alien in the context of the conservation area in both their design and material components. Additional information relating to the design of the mast heads which have been reduced in size result in a lessening of impact on local views, but the overriding conclusion from this assessment is that the harm caused to the conservation area by the development proposal is substantial.

In the apparent absence of any scope to reduce the height, location or numbers of the floodlight structures to lessen the effects of visual intrusion the application should be refused on the grounds of harm to the setting of the listed buildings within the conservation area.

[This issue was considered in Key Issue C of the previous Committee report.]

**KEY ISSUES****(A) HAS THE OPTIONS REPORT SUBMITTED FOLLOWING DEFERRAL ADEQUATELY JUSTIFIED THE PROPOSAL AS THE OPTIMUM SOLUTION?**

The report submitted has provided detail on the floodlighting options that could be considered and why they have been discounted. In the process, the proposed design has been amended so that the headframes are more rounded in shape and would appear less bulky as a result.

From the comments received, the option most favoured by local residents is a hinged-base mast system, with the masts lying flat during the close season. This option has been investigated and the advice received from light specialists Musco Lighting, an independent lighting consultant Neil Johnson, and Abacus Lighting (the hinged base masts designers) is that this is an unrealistic and impractical option for the Ground.

The proposed option of 6 static masts is supported by the 3 lighting specialists referred to above, together with the ECB.

It is considered that the Club have adequately justified that the proposal is the optimum floodlighting solution for the Ground.

**(B) ARE THE PROVISIONS OF THE FLOODLIGHT USAGE MANAGEMENT PLAN ACCEPTABLE?**

The draft FLUMP was discussed with local residents and amended to take account of their views. The contents have been assessed by Pollution Control and are considered acceptable. The provisions of the FLUMP are considered to set out an appropriate balance between the requirements of the Club and the amenity concerns of local residents.

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The evidence put forward has demonstrated that the floodlighting proposal being considered is the optimum solution for the Ground. The design has been improved which will be of benefit to short distance views.

It is acknowledged that the floodlights will have a harmful impact on residential amenity through light pollution, although the adoption of the FLUMP will serve to minimise this as much as is realistically possible. The floodlights would also visually harm both the immediate setting of the area and longer distance views of the site, including harm to the setting of the listed building.

However, this harm has to be weighed against the significant public benefits that would arise in terms of the cultural and economic significance of the Cricket Club through its ability to host international matches that would otherwise be played elsewhere. It is considered that this significance outweighs the harm caused by the proposal which is, accordingly, recommended for approval.

**RECOMMENDED GRANT subject to condition(s)****Time limit for commencement of development**

## 1. Full Planning Permission

The development hereby permitted shall begin before the expiration of three years from the date of this permission.

Reason: As required by Section 91 of the Town and Country Planning Act 1990, as amended by Section 51 of the Planning and Compulsory Purchase Act 2004.

**Pre commencement condition(s)**

## 2. Prior to the first use of the floodlights for competitive cricket the lux levels, for both vertical and horizontal illuminance, shall be checked against those on the Predicted Overspill Footprint Drawings (140615H 26 November 2014 Vertical and Horizontal lux). Lux levels shall be checked at the boundary of the Gloucestershire County Cricket Club Ground and at any other reasonable location within 50 metres of the boundary of the Gloucestershire County Cricket Club as requested by an authorised officer of Bristol City Council Pollution Control Team. For the avoidance of doubt, the floodlights shall only be checked between 10:00hours and 23:00 hours.

If the lux levels are 5% above those on the Predicted Overspill Footprint Drawings then appropriate mitigation measures shall be carried out in agreement with an authorised officer of Bristol City Pollution Control Team.

Reason: In the interests of protecting residential amenity.

## 3. The floodlights shall be used on no more than 15 days in any calendar year.

Reason: In the interests of protecting residential amenity.

## 4. Apart from essential maintenance the floodlights shall only be used in connection with competitive cricket matches.

Reason: In the interests of protecting residential amenity.



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5. Apart from essential maintenance, the floodlights shall only be used in connection with competitive cricket matches.

Reason: In the interests of protecting residential amenity.

6. Floodlight Usage Management Plan:

The floodlights shall only be used in accordance with the Floodlight Usage Management Plan submitted with the application. Any proposed amendments or revisions to the Floodlight Usage Management Plan shall be submitted to and approved in writing by the Local Planning Authority.

Reason: In the interest of protecting residential amenity.

7. Traffic Management Plan

An updated Traffic Management Plan including measures to reduce the on-street impact of spectator parking shall be submitted and approved in writing prior to the use being commenced.

Reason: In the interests of highway safety and residential amenity

**Pre occupation condition(s)**

8. Materials

Development shall be carried out in accordance with specified material - Steel ASTM A572 GR65; unless otherwise agreed in writing by the Local Planning Authority.

Reason: To ensure that the external appearance of the floodlights are satisfactory.

**List of approved plans**

9. List of approved plans and drawings

The development shall conform in all aspects with the plans and details shown in the application as listed below, unless variations are agreed by the Local Planning Authority in order to discharge other conditions attached to this decision.

140615PS Pole Configuration P2 & P5 (sheet 3 of 3), received 23 March 2015

140615PS Pole Configuration P1 & P6 (sheet 2 of 3), received 23 March 2015

140615PS Pole Configuration P3 & P4 (sheet 1 of 3), received 23 March 2015

(08)01 Site location plan, received 15 October 2014

(08)100 Site plan, permanent seating layout, received 15 October 2014

(08)101 Site plan, temporary seating layout, received 15 October 2014

Design and Access Statement, received 15 October 2014

Floodlight Guidelines, received 15 October 2014

Ecology and Protected Species Assessment, received 15 October 2014

Heritage Statement, received 15 October 2014

Planning Statement, received 15 October 2014

Statement of Community Involvement, received 15 October 2014

Sunlight Shadow Path Analysis, received 15 October 2014

Musco Lighting Assessment, received 31 October 2014

Musco Detailed Lighting Assessment Sheets (Pages 1 -32), received 31 October 2014

Horizontal Spill Document (Lighting), received 4 November 2014

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Spill Calculation Documents (Permanent, Horizontal, Vertical and Sky Glow), received 9 December 2014  
Sustainability Details, received 9 December 2014  
Lux Level Plan to Zero, received 15 December 2014  
Updated bat survey, received 15 December 2014

Reason: For the avoidance of doubt.

**Advices**

1. The development hereby approved is likely to impact on the highway network during its construction. The applicant is required to contact Highway Network Management to discuss any temporary traffic management measures required, such as footway, Public Right of Way or carriageway closures, or temporary parking restrictions. Please call 0117 9031212 or email [traffic@bristol.gov.uk](mailto:traffic@bristol.gov.uk) a minimum of eight weeks prior to any activity on site to enable Temporary Traffic Regulation Orders to be prepared and a programme of Temporary Traffic Management measures to be agreed.

**BACKGROUND PAPERS**

Transport Development Management	9 January 2015
Crime Reduction Unit	25 November 2014
Conservation Section	2 December 2014
Civil Aviation Authority	14 January 2014
National Air Traffic Services	8 December 2014
Nature Conservation Officer	15 December 2014
Landscape	9 April 2015