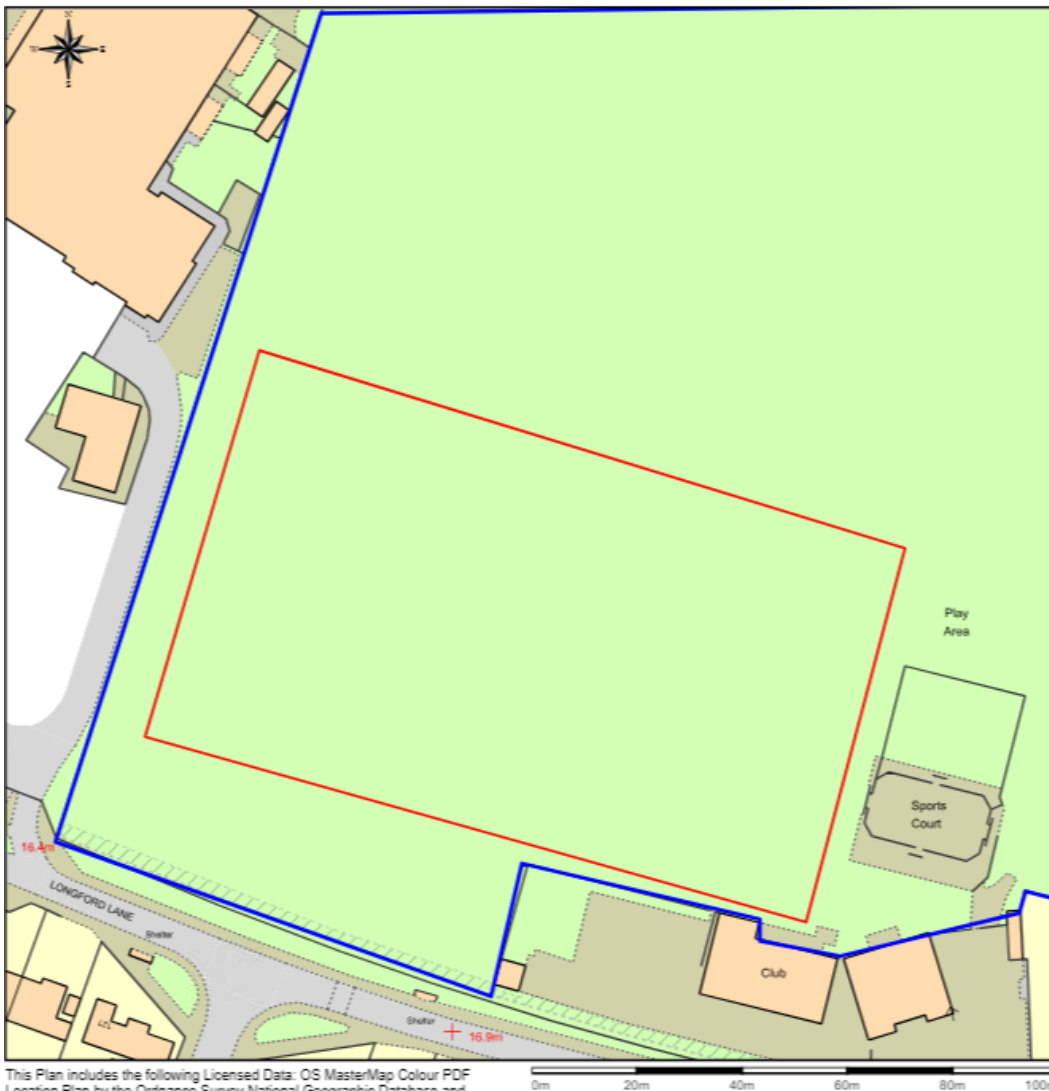


# GLOUCESTER CITY COUNCIL - DEVELOPMENT CONTROL

Committee: | Planning  
Date: | 03.09.2024  
Address/Location: | Longlevens Rugby Football Club Longford Lane Gloucester GL2 9EU  
Application No: | 23/00905/FUL  
Ward: | Longlevens  
Expiry Date: | 18.01.2024 (EOT agreed until 06.09.2024)  
Applicant: | Mr Richard Bennett  
Proposal: | Erection of 6x floodlighting columns and floodlights for the main pitch and training areas at Longlevens Rugby.  
Report by: | Craig Stock  
Appendices: | Case officer to attached key plans that illustrate the proposal, minimum requirement is site location and site layout plan

## Site Location Plan



## 1.0 REASON FOR REFERRAL TO COMMITTEE

The scheme of delegation within the Council's Constitution states that the Planning Committee will determine "*Applications submitted by or on behalf of the City Council, or for development on Council owned land or where the Council has a direct interest, except where no objections are received.*"

The application site is owned by Gloucester City Council and two objections have been received.

## 2.0 SITE DESCRIPTION AND PROPOSAL

- 2.1 The application site is comprised of a rugby pitch located within the south-western corner of the wider Longlevens Recreation Ground. The pitch is used by Longlevens Rugby Football Club, whose clubhouse and changing rooms lie just outside the application site.
- 2.2 Longlevens Recreation Ground is designated as a Playing Pitch within the Council's Playing Pitch Strategy 2015-2025, and also as Public Open Space within the Council's Open Space Strategy 2020-2025. Both documents are adopted as Supplementary Planning Documents.
- 2.3 This application proposes the erection of 6no floodlighting columns around the perimeter of the rugby pitch: one would be located on each corner, with another two at either end of the halfway line.
- 2.4 Each floodlighting column would be 15m in height, with the lights affixed to the top.
- 2.5 Floodlights 1 and 4 would be located on the two eastern corners of the pitch, and would each carry 2x Phillips Optivision Gen3.5 LED Floodlights. The block plan provided with the application indicates that these lights would be used solely to illuminate the interior of the rugby pitch, and would be oriented accordingly.
- 2.6 Floodlights 2 and 3 would be located on the southern end of the halfway line and at the south-west corner of the pitch respectively; they would both carry 3x Phillips Optivision Gen3.5 LED Floodlights. The block plan indicates that both would illuminate the area of the pitch. One of the lights atop each column would also be oriented to face southwards, so as to illuminate the area immediately to the south of the rugby pitch which is used by the Rugby Club as a training area.
- 2.7 Floodlights 5 and 6 would be located at the northern end of the halfway line and at the north-west corner of the pitch respectively; they would both carry 4x Phillips Optivision Gen3.5 LED Floodlights. The block plan indicates that both would illuminate the area of the pitch. Two of the lights atop each of these columns would be oriented northwards to illuminate the training pitch immediately north of the main rugby pitch.
- 2.8 The block plan showing this layout and orientation is appended to this report. Plans have also been submitted illustrating the anticipated light-spill from the floodlights; these are available on public access.
- 2.9 Supporting information submitted alongside the application confirms that the applicants intend to only operate the floodlights between the hours of 15:00-21:30 from Tuesday to Saturday.
- 2.10 A preliminary ecological assessment and bat activity survey have been submitted in support of the application. The evidence contained within these documents has informed the final

proposed lighting strategy.

### 3.0 RELEVANT PLANNING HISTORY

Application Number	Proposal	Decision	Decision Date
01/00720/FUL	Replacement of flat roof on part of club house with pitched roof and siting of portable changing rooms (for temporary period)	Grant subject to conditions	11.12.2001
03/00494/FUL	Extension and external alterations to sports and social club (replacement changing rooms and toilets facilities)	Grant subject to conditions	21.06.2003
97/00171/OUT	(Outline) Erection of single storey building to provide changing rooms.	GOP	10.06.1997
99/00001/FUL	Single storey extension at rear	Grant subject to conditions	19.04.1999
99/00102/FUL	Erection of changing rooms, showers and fitness room. Alterations to existing access and provision of additional car parking.	Grant subject to conditions	12.07.1999
04/01067/FUL	First floor extension to club house (changing rooms x 4, WC, gym and physio treatment room) and lobby entrance. Erection of storage building.	Grant subject to conditions	02.11.2004
20/00725/COU DA	Notification under GPDO Class DA: restaurants and cafes, drinking establishments and drinking establishments with expanded food provision to temporarily provide takeaway food	Permitted Development.	03.08.2020
20/01143/FUL	Addition of fencing around the rugby pitch	Grant for three years.	09.09.2021
21/00911/ADV	Attach advertising boards to the UPVC fence.	Grant for five years.	05.10.2023
22/00248/FUL	Proposed extension and alteration to clubhouse to include new gym, larger ground floor lounge bar, addition of balcony and bar area on the first floor, extension to existing store and extended car parking area.	Grant for three years.	03.11.2022

### 4.0 RELEVANT PLANNING HISTORY

4.1 The following planning guidance and policies are relevant to the consideration of this application:

#### 4.2 National guidance

National Planning Policy Framework (NPPF) and Planning Practice Guidance

#### 4.3 Development Plan

**Gloucester, Cheltenham and Tewkesbury Joint Core Strategy (Adopted 11 December 2017)**

Relevant policies include:

SD3 – Sustainable design and construction  
SD4 – Design requirements  
SD9 – Biodiversity and geodiversity  
SD14 – Health and environmental quality  
INF1 – Transport network  
INF3 – Green Infrastructure  
INF4 – Social and community Infrastructure

#### 4.4 **City of Gloucester Local Plan (Adopted 14 September 1983)**

The statutory Development Plan for Gloucester includes the partially saved 1983 City of Gloucester Local Plan. Paragraph 225 of the NPPF states that '*...due weight should be given to relevant policies in existing plans according to their degree of consistency with this framework (the closer the policies in the plan to the policies in the Framework, the greater the weight that may be given.*' The majority of the policies in the 1983 Local Plan are out-of-date and superseded by later planning policy including the NPPF and the Joint Core Strategy. None of the saved policies are relevant to the consideration of this application.

#### 4.5 **Gloucester City Plan**

The Gloucester City Plan ("City Plan", "GCP") delivers the JCS at the local level and provides policies addressing local issues and opportunities in the City. It was adopted on 26th January 2023 and forms the development plan alongside the JCS.

Relevant policies include:

C1 – Active design and accessibility  
E2 – Biodiversity and geodiversity  
E7 – Trees, woodlands and hedgerows  
E3 – Green/Blue Infrastructure  
F1 – Materials and finishes  
G1 – Sustainable transport and parking

#### 4.6 **Other Planning Policy Documents**

##### **Gloucester Local Plan, Second Stage Deposit 2002**

Regard is also had to the 2002 Revised Deposit Draft Local Plan. This has been subjected to two comprehensive periods of public and stakeholder consultation and adopted by the Council for development control purposes. While there are number of policies in the 2002 Plan which are considered to accord with the NPPF and have not been superseded by the JCS, none of these are considered to be relevant to the current application.

#### 4.7 **Supplementary Planning Guidance/Documents**

- Open Space Strategy 2020-2025
- Playing Pitch Strategy 2015-2025

All policies can be viewed at the relevant website address:- national policies:

<https://www.gov.uk/government/publications/national-planning-policy-framework--2>

Gloucester City policies:

<http://www.gloucester.gov.uk/resident/planning-and-building-control/planning-policy/Pages/current-planning-policy.aspx>

## 5.0 **CONSULTATIONS**

### 5.1 **Highway Authority – No Objection (07.12.2023)**

Based on the analysis of the information submitted, the Highway Authority concludes that there would not be an unacceptable impact upon Highway safety. There are no justifiable grounds on which an objection could be maintained.

## 5.2 Ecology Adviser

### Initial Response – more information required prior to determination (13.12.2023)

No ecology information has been submitted with this application. However, details on lighting have been provided and reviewed.

The proposed illumination hours have been confirmed as Tuesday to Saturday, 15:00-21:30. The lighting plan shows that 10 lux light levels would fall on the southern and western boundary habitats that could be used by bats. Bat roosts may be present in trees and foraging commuting habitat could be impacted by the addition of external lighting. It is important to gather information at site level to assess the potential impacts upon species due to Artificial Lighting at Night (ALAN).

In the first instance, light levels should be maintained or reduced – this is in line with the mitigation hierarchy where impacts are avoided in the first instance by being planned out. A scheme may then look at ecological betterment through a sensitive lighting design that minimises potential environmental impacts and maximises the potential of habitat and species enhancement work. As a last resort, where impacts cannot be avoided, mitigation and/or compensatory measures should be sought.

In this instance, impacts are likely to be low; however, work is required prior to determination in order to collect further information regarding baseline habitats and species, and where necessary to inform a suitable lighting mitigation plan. It is considered that a full Preliminary Ecological Appraisal is not required. The Ecological Adviser has recommended that the following items be provided:

An ecological walkover survey to confirm and include:

- Baseline habitats
- Opportunities and constraints
- Inform lighting plans and reduce proposed lighting on potentially important habitats or justify why proposed lighting is acceptable where proposed onsite lighting does not follow best practice guidance; and
- Identify mitigation/enhancement opportunities

A bat activity survey to be undertaken during the bat activity season (May-September), with results used to inform a suitable lighting mitigation plan.

- In first instance, to avoid delays the applicant should seek to demonstrate that there would be no light fall onto potentially important features that could be used by bats
- Any impacts identified should then be mitigated for
- The applicant should appoint an ecologist and lighting engineer to ensure the bats and artificial lighting guidance (08/23) are followed
- Without survey data it would have to be assumed that the boundary features could support important foraging and commuting routes for bats. Alternatively, the applicant may wish to wait and undertake the surveys to demonstrate that the boundary features are not used as important commuting/ foraging features.

In any case, the trees should be checked for roosting potential as the lighting plan currently indicates light spill onto trees/tree line up to 10 lux which is very high and would impact roosting bats as well as foraging and commuting bats.

### Second response – more information required prior to determination (04.04.2024)

A preliminary ecological appraisal was submitted for consideration. The Ecology Advisor made the following comments on this report:

- The report identifies that the site mainly comprises managed grassland for use as sports pitches, with a tree line present along the western boundary and a small, maintained hedge located adjacent to the club house. None of the trees were identified to have any evidence of bats but confirmation is required on whether the trees have suitable features to support bat roosts in line with BCT guidelines.
- While the report predominantly focuses on potential impacts to bats and nesting birds, impacts on other nocturnal animals have not been discussed. This should be added to the report, with any mitigation or precautionary measures provided.
- The report states that bats can adapt to changes in light levels and will probably avoid this area when the floodlights are on. This conflicts with, and would be an offence under, the Conservation of Habitats and Species Regulations 2017
- The lighting plan shows that 10lux light levels would fall on boundary habitats that could be used by bats – these light levels are far too high and should be reduced. Increases in artificial lighting in already artificially lit areas can also have a detrimental impact on bat commuting and foraging behaviours.
- It is important, therefore, to gather information at site level to assess impacts. As noted in the previous consultation response, the mitigation hierarchy needs to be followed in terms of preferably planning out impacts, providing betterment, minimising environmental impacts and maximising species and habitat protection, and, as a last resort where impacts cannot be avoided, mitigation and compensatory measures being sought.

The following are requirements prior to determination:

- Amendments to PEA to include protected species other than bats and birds (nocturnal animals like badgers, amphibians, hedgehogs)
- A bat activity survey undertaken by a suitably experienced ecologist. Following the results of the survey, mitigation and enhancement measures should be provided.
- A lighting strategy informed by the results of the bat activity survey.

### Third Response – No Objection subject to conditions (20.06.2024)

The bat survey received is considered acceptable.

The amended PEA did not find any evidence of other notable or protected species on site. The details received are considered acceptable.

The lighting plans have not been updated to reduce light levels falling on boundary habitats and potential foraging/commuting routes for bats along the southern and western boundary habitats, as was requested in the previous consultation response. However, given that the bat activity survey found only low levels of common pipistrelle bats at the site, this revised lighting strategy can be resolved as a pre-commencement condition.

Conditions are recommended for the submission and approval of this revised lighting strategy prior to determination, and to seek details and subsequent implementation of ecological enhancement measures on-site.

## Final Response – No Objection subject to conditions (24.07.2024)

The Council's Ecology advisor was reconsulted following submission of the requested lighting plan prior to determination, rather than at condition stage.

The submitted lighting strategy is acceptable. Conditions are recommended to ensure implementation in accordance with the approved strategy, and for ecological enhancement measures as was recommended previously.

### 5.3 **Environmental Health Advisor (Worcestershire Regulatory Services) – No Objection (08.12.2024)**

The submitted lighting assessment predicts that light spill and glare from the proposed floodlighting is compliant with the ILP guidance on obtrusive lighting.

## 6.0 **PUBLICITY AND REPRESENTATIONS**

6.1 83 neighbouring properties were notified for 21 days on 29.11.2023. Multiple site notices were displayed along Longford Lane and within the site itself, also on 29.11.2023.

6.2 2 letters of objection were received, raising the following issues:

- The Rugby Club have used portable floodlights on occasion. These were very bright and were facing directly towards residential properties on Longford Lane, causing disturbance and nuisance.
- Increase in light pollution to the residents of Whitebeam Close.
- The proposed illumination days/hours are excessive – further restrictions should be outlined as a constraint within any approval.
- Concerns that the proposed illumination is excessive – illumination levels are six times brighter than a road junction on the motorway and should be reduced to a level no greater than is required for sports to take place in the evening.
- Objection to the Longlevens Recreation Ground changing from an area of near darkness in the evenings to one that will be brightly illuminated.
- Suggestion that sensors are fitted such that the lights would only switch on as dusk approaches.
- Suggestion that illumination is restricted to only one or two evenings every week.
- Suggestion that the lights that would face northwards over the new training area (numbers 5 and 6) be on a separate electrical circuit so that they can be dimmer than the others, and switched off when not in use.
- Suggestion that the lights proposed to serve the pitch itself are dimmed in the periods before and after an evening game and are only at full brightness for the game itself.

6.3 The applicants subsequently submitted a written response to these objections. This was published on Public Access on 01.02.2024 and the two objectors were subsequently reconsulted.

6.4 One comment was received on 07.02.2024 – this neither objected nor expressed explicit support, but raised the following points:

- Welcomed the Applicants' response, including the additional information regarding lighting design, and confirmation that the floodlights would be dimmable and wired on separate circuits.
- Welcomed the Applicants' confirmation that an agreement had been reached with Milestone School for use of the floodlit pitches (*NB – such confirmation was provided by the Applicants and published on Public Access on 29.02.2024*)
- Suggestion that the Applicant provides a training and game schedule to justify the



- proposed illumination hours.
- Suggestion that a condition be attached to any approval to ensure the floodlights are only used to provide evening training facilities for Longlevens-based clubs and are solely for rugby games/training (ie no other sports or events)

6.5 The full content of all correspondence on this application can be viewed on:  
[www.gloucester.gov.uk/planning-development/planning-applications/search-planning-applications](http://www.gloucester.gov.uk/planning-development/planning-applications/search-planning-applications)

## 7.0 OFFICER OPINION

### 7.1 *Legislative background*

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires the Local Planning Authority to determine planning applications in accordance with the Development Plan, unless material considerations indicate otherwise.

7.2 Section 70(2) of the Town and Country Planning Act 1990 (as amended) states that in dealing with a planning application, the Local Planning Authority should have regard to the following:

- a) the provisions of the development plan, so far as material to the application;
- b) any local finance considerations, so far as material to the application; and
- c) any other material considerations.

7.3 The development plan consists of the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy (JCS), The Gloucester City Plan (GCP) and the partially saved 1983 City of Gloucester Local Plan. However, as outlined earlier, the 1983 Local Plan is considered to be out-of-date.

7.4 It is considered that the main issues with regards to this application are as follows:

- Principle
- Design, Layout and Landscaping
- Traffic and Transport
- Residential Amenity
- Ecology
- Economic Considerations

### 7.5 **Principle**

Gloucester City Plan Policy C3 sets out the LPA's approach to public open space, playing fields and sports facilities. Development proposals to enhance playing fields will be supported where they deliver the aims and recommendations of the Council's Open Space Strategy, Playing Pitch Strategy and Built Sports Facilities Strategy, or any future iterations. These supplementary documents lay out the evidenced needs of the local area and support the implementation of this policy. It is acknowledged that sports and recreational facilities bring people together and provide opportunities for social and physical activity, contributing to quality of life, health and well-being in the area.

- 7.6 Policy C3 of the Gloucester City Plan states that existing public open spaces, playing fields and built sports facilities will be protected from redevelopment to alternative uses, in whole or in part, unless *at least one* of a series of criteria are met. These criteria are as follows:
1. *For public open spaces, an assessment demonstrates the site is of low value and of poor quality, with no opportunities for improvement and is surplus in terms of all functions that open space can provide.*
  2. *For playing fields and sports facilities, an assessment demonstrates there is an excess of provision in the local area, there is no current or planned future demand for such provision, or that there would be no overall shortfall in provision.*

*If the criteria above cannot be met:*

3. *The open space, playing field or facility can be replaced by alternative provision of an equivalent or better quality and quantity in an accessible and appropriate location to the community where the loss would occur; or*
4. *The proposal is ancillary development that would enhance existing facilities and not reduce or prejudice its ongoing use; or*
5. *The proposal affects land that is not suitable, or is incapable, of forming an effective part of an open space, playing field or facility and its loss would not prejudice the ongoing use of the remainder of the site for that purpose.*

- 7.7 This application proposes to erect floodlights and so would not constitute a redevelopment (in whole or in part) to an alternative use; therefore, this policy is only tangentially relevant to the assessment of this application. It was not, therefore, considered necessary to seek consultee input from Sport England nor the Council's Public Spaces advisor.

In any case, the application is consistent with this policy in that it would not lead to any net loss of playing pitches or open space, and would provide amenities ancillary to and supportive of the existing sports facilities whilst not prejudicing its ongoing use.

- 7.8 The Council's Playing Pitch Strategy recommends that options are explored at Longlevens Recreation Ground to provide a dedicated floodlit training area to alleviate the use of the match pitches. This application would be in line with this recommendation.

- 7.9 Accordingly, the application is considered acceptable in principle subject to assessment against other policy objectives.

#### 7.10 **Design, Layout and Landscaping**

The NPPF (Par.135) states that new residential developments should be of high quality design, create attractive places to live, and respond to local character integrating into the local environment. Policy SD3 requires all developments to demonstrate how they contribute to the principles of sustainability, Policy SD4 sets out requirements for high quality design, Policy SD6 requires development to protect or enhance landscape character while Policy SD10 requires housing of an appropriate density, compatible with good design, the protection of heritage assets, local character and compatible with the road network.

- 7.11 The proposal would see the erection of 6no 15m tall floodlighting columns on the perimeter of the existing rugby pitch in the south-western corner of the wider Recreation Ground. Each column would be of metal construction and would carry either two, three or four lights affixed to the top.

- 7.12 The application is considered to be acceptable with regards to design, layout and landscaping. The columns would undoubtedly be a prominent feature by virtue of their height; however, any impacts upon the visual amenity of the vicinity would fall clearly below an adverse level.
- 7.13 The southernmost columns would be located approximately 28m from the boundary between the recreation ground and public footway and would be partially screened from view by a series of comparably tall trees. The westernmost columns would sit approximately 10m from the boundary with Milestone School and another 8-10m from the buildings within this complex. They would also be partially screened by tree cover along the boundary. The columns along the north of the pitch would be located within the interior of the recreation ground, while those along the east of the pitch would be situated in close proximity to the cluster of clubhouse buildings serving both the Rugby and Football Clubs. For the reasons outlined above, the proposed floodlights would not be unduly harmful to the visual amenity of the area.
- 7.14 The floodlights would constitute ancillary facilities supportive of the main use of the site as a playing pitch; justification has been provided for their necessity and this is in line with local Planning Policy, and so any minor harm brought upon the visual amenity of the area can be weighed against the public benefits of the application.
- 7.15 Accordingly, the application is considered to be acceptable with regards to design, layout and landscaping.
- 7.16 **Traffic and transport**  
The NPPF (Par.115) requires that development proposals provide for safe and suitable access for all and that development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe. Policy INF1 of the JCS requires safe and accessible connections to the transport network
- 7.17 The County Highways Authority were consulted on this application, principally in order to ascertain whether the floodlights would present any issues regarding Highway Safety resulting from illumination or glare. No objection was raised by the Highway Authority and therefore the application can be considered acceptable with regards to this policy area.
- 7.18 **Residential Amenity**  
Paragraph 135 (f) of the NPPF sets out that planning decisions should ensure that developments create places with a high standard of amenity for existing and future users. This is reflected in Policy SD14 of the JCS which requires that new development must cause no harm to local amenity including the amenity of neighbouring occupants.
- 7.19 A series of light-spill plans were submitted alongside this application, as well as technical information regarding the specific floodlight product proposed. The Applicant confirmed their intention to limit illumination hours to 15:00-21:30, Tuesday to Saturday.
- 7.20 Both of the originally submitted neighbour objections raised concern over the potential for adverse light pollution, glare and related disturbance as a result of the application. One of these comments raised these concerns in reference to the impacts upon Longford Lane, the other with reference to Whitebeam Close. The latter commenter also made a series of suggestions regarding further restricting illumination days/hours beyond those currently proposed, dimming the lights immediately before and after matches take place, setting lights 5 and 6 (both facing northwards) to a lower brightness and restricting their use to training sessions only.

- 7.21 The Council's environmental health consultee was notified upon validation of the application. They raised no objection to the proposals and noted that the submitted lighting assessment predicts that light spill and glare would be compliant with ILP (Institute of Lighting Professionals) guidance on obtrusive lighting. This would suggest that no residential properties stand to be unduly affected by adverse light pollution.
- 7.22 Regarding the particular concerns raised within the neighbour comments, the nearest residential property on *Longford Lane* (number 118) stands some 50m away from the proposed location of column 1 when measured to the property boundary, and over 70m away when measured up to the rear elevation of this dwelling itself. It should also be noted that the submitted block plan and light spill plans confirm that the lights atop column 1 would face towards the interior of the pitch, rather than eastwards towards these properties. Columns 2 and 3 would carry south-facing floodlights and these would face towards a series of properties on the southern side of Longford Lane (105-123 Longford Lane), but the front elevations of these dwellings would be some 65m away. The tree-line along the Recreation Ground's southern boundary would also shield these properties to a large extent.
- 7.23 Columns 5 and 6 would carry lights that face northwards towards *Whitebeam Close*, but these dwellings would be some 150m away. Given this, and in light of WRS' confirmation that the light-spill and glare would fall below an adverse level, it is considered that the application would not result in any adverse amenity impacts upon residents of either Longford Lane nor Whitebeam Close.
- 7.24 The Applicants' submitted a written response to the concerns raised in the neighbour comments which was subsequently published on Public Access (the objectors were both subsequently reconsulted). In this response, the Applicant confirmed that:
- The floodlights will be wired in a manner that enables the training and match fields to be illuminated separately to different levels.
  - Reducing illumination to only one or two nights per week would not be feasible given the Club's schedule of matches and training.
  - The Club intend to follow RFU guidelines on lighting – the training pitches will be lit to 100lux and the match pitch to 200lux.
  - The design, angle and orientation of the floodlights has been carefully designed to be compliant with ILP guidance. Further tests were carried out assessing the levels of glare, vertical illuminance and Upward Light Ratio at properties on Longford Lane and Whitebeam Close; these tests confirmed ILP compliance when measured at all properties.
- 7.25 One neighbour comment recommended that lower illumination levels for the training pitches be mandated by condition. The Applicants' confirmed their intention to illuminate the training pitches to lower levels as per RFU guidelines; however, WRS' response of no objection was submitted prior to this pledge being made formally. It is clear, therefore, that a separate condition mandating this would not be necessary in order to make the application acceptable, and so no such condition has been included in this recommendation. However, the published statement has been included within the list of approved documents in Condition 2, and so this would provide an element of control on this matter.
- 7.26 In light of the above, the application is considered acceptable with regards to residential amenity (subject to a condition restricting illumination to the aforementioned hours).

7.27 **Ecology and biodiversity**

Policy SD9 of the JCS provides that the biodiversity and geological resource of the JCS will be protected and enhanced. Policy E1 of the Gloucester City Plan states that developments should – where appropriate – provide net gains appropriate to the ecological network. It also states that any impacts upon the ecological network should be avoided where possible and otherwise satisfactorily mitigated.

7.28 The Council's external Ecology advisor was consulted upon validation of this application regarding the potential impacts of light-spill upon species and habitat within close proximity to the application site.

7.29 A comprehensive summary and timeline of consultation with the Ecology Advisor is provided in Section 5.2 of this report. In short, the first two Ecology responses recommended that the determination of the application be deferred pending the submission of specialist information regarding the habitats and species present at (and near to) the site. Particular attention was drawn by the Ecology advisor to the potential for bat roosts, foraging bats, bird nests and the presence of other nocturnal animals within the southern and western boundary habitats. Any bat survey would have to be carried out within the May-August season.

7.30 The applicants subsequently submitted a Preliminary Ecological Appraisal for consideration, followed by the results of a night-time bat activity survey. These documents established that there are a small number of Common Pipistrelle Bats commuting and foraging within the southern and western boundary habitats. A revised lighting strategy informed by the findings of these documents was later submitted – this strategy proposed reduced lux levels falling upon the boundary habitats as per the recommendation of the Ecology advisor. Two further responses were received from the Ecology consultee confirming that these documents are acceptable from an ecology standpoint.

7.31 The Ecology advisor recommended conditions to ensure the implementation of the revised lighting strategy, and to seek further ecological enhancements at the site.

7.32 It is considered that this second condition for ecological enhancements is not necessary to make the application acceptable; the implementation of the revised lighting strategy would ensure that the application results in no undue impacts upon protected habitats, nor any net loss in biodiversity. Therefore, subject to the implementation of the approved lighting strategy, the application is considered acceptable with regards to biodiversity and ecology.

7.33 **Economic considerations**

The construction phase would support employment opportunities and therefore the proposal would have some economic benefit. Further, paragraph 3.1.9 of the JCS identifies that it is important to ensure that sufficient housing is made available to support the delivery of employment and job growth, this adds some weight to the case for granting permission.

7.34 **Conclusion**

This application has been considered in the context of the policies and guidance referred to above. The proposal is consistent with those policies and guidance in terms of design, materials, highway safety implications, impact upon the amenity of any neighbours and the local area; the proposal is acceptable and accordingly it is recommended that planning permission be granted.

8.0 **RECOMMENDATION OF THE HEAD OF PLACE**

8.1 That planning permission is **GRANTED** subject to the following conditions:

## 8.2 **Condition 1**

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

### **Reason**

To comply with the requirements of Section 91 of the Town and Country Planning Act 1990 as amended by Section 51 of the Planning and Compulsory Purchase Act 2004.

## **Condition 2**

The development hereby permitted shall be carried out in accordance with the following approved documents except where these may be modified by any other conditions attached to this permission.

- Site Location Plan dated 04.11.2020 (received 10.11.2023)
- LRFC S1 – Export Longlevens RFC 200 Lux LED Horizontal Light Spillage Iso Contours (amended version dated 18.07.2024)
- LRFC S2 – Export Longlevens RFC 200 Lux LED Horizontal Light Spillage Results (amended version dated 18.07.2024)
- LRFC S3 – Longlevens RFC Existing Training + Street Lighting VS Proposed Floodlighting Spillage Results (dated 18.07.2024)
- *Longlevens RFC Spillage Impact Report LED Floodlighting* – report received 19.07.2024 written by Highlights Floodlighting LTD
- Optivision LED gen3.5 – Smart area and recreational sports lighting Product family leaflet (received 10.11.2023)
- Philips Optivision LED gen3.5 floodlighting system – data sheet (received 10.11.2023)
- Optivision LED floodlights – Understanding our louvres slideshow (dated August 2021, received 10.11.2023)
- LRFC E0 – Longlevens RFC Block Plan Elevations Layout for Columns 1-6 (dated and received 22.11.2023)
- LRFC E1 – Longlevens RFC Elevations for Columns 1+4 (dated and received 22.11.2023)
- CRFC E2 – Longlevens RFC Elevations for Columns 2+3 (dated 29.09.2021, received 22.11.2023)
- CRFC E3 – Longlevens RFC Elevations for Columns 5+6 (dated 29.09.2021, received 22.11.2023)
- *Applicant response to Neighbour comments* – as published on public access 01.02.2024
- Preliminary Ecological Appraisal June 2024 – prepared by Kenneth Coyne (received 25.06.2024)
- Bat Activity Survey May 2024 – prepared by Kenneth Coyne (received 20.05.2024)

### **Reason**

For the avoidance of doubt and in the interests of proper planning.

## **Condition 3**

The floodlights hereby permitted shall only be illuminated between the hours of 15:00 and 21:00, Tuesday to Saturday. No illumination shall take place outside of these hours.

### **Reason**

In the interest of the visual amenity of the area and to protect the amenities of nearby properties.

**Condition 4**

The floodlighting shall be installed and operated in accordance with the proposals and recommendations included within *Longlevens RFC Spillage Impact Report LED Floodlighting* (as received on 19.07.2024 written by Highlights Floodlighting LTD) and the associated plans (LRFC S1, LRFC S2 and LRFC S3). Lux levels generated by the floodlights shall not exceed the levels specified in these documents.

**Reason**

In order to protect nocturnal species and their habitats in accordance with Policy SD9 of the Joint Core Strategy and E1 of the Gloucester Plan.

**Person to Contact:** Craig Stock (396720)