

Please find my comments on the proposed floodlit sports pitch at Connaught School. Whilst I welcome projects that improve recreational facilities in the Valley, I do have some concerns over the possible negative impact on the Blackwater Valley Strategic Gap of this particular proposal.

The Blackwater Valley Countryside Strategy contains the following policy on lighting as we are concerned with the continuing encroachment of light pollution.

***Policy 13. Artificial lighting will be kept to a minimum on facilities within the Valley. Lighting will not normally be provided on the Blackwater Valley Path.***

*Lights have an urbanising effect on the Valley environment and have been proven to have a detrimental effect on wildlife. Only lighting necessary for any essential night-time operations, safety or security should be provided. Lights should be aimed downwards, and be of the minimum power necessary to perform their role.*

*Lighting paths within the Valley may be considered in more urbanised areas where safety issues and public demand dictates. This should be of a low-level type, both in terms of output and physical height. Waist height, 'Bollard' type lights are a suitable option.*

I think 15m high floodlights, even when unlit, will be by their nature an urbanising intrusion into the strategic gap and here being so close to the river and the riverside footpath will have a strong negative impact on the landscape.

Another concern is the impact on nocturnal biodiversity and in particular bats that use the river corridor. The ecological survey has highlighted the importance of the river corridor, southern tree belt and Tongham Pool to bats. This value has long been known to the BVCP and we regular use Tongham Pool for educational bat walks. (Incidentally the ecological survey based on information from Hampshire did not identify that Tongham Pool, in Surrey, is a proposed SNCI).

The site options paper does not mention or take account of this issue. Not does the response from the Environment Agency which is solely concerned with flooding and I wonder if the ecological issues were raised with them.

The bat survey suggested a number of possible mitigation measures including limiting use of floodlights to Sept to May, man made barriers to prevent light pollution to the lake, use of low pressure lights and tree planting. Of these the

planning statement only mentions planting more trees & shrubs but gives no further details to quantify the effect this will have.

This application does not include a survey of current light condition but indicates that levels up to 25 lux are possible with 8m of the river bank and even up to 50lux with in the tree belt to the south, both of which areas are indicated as being high value to foraging and commuting bats and highly likely to contain bat roosts.

In a similar situation elsewhere in the Valley the Environment Agency requested the following condition.

*"There should be no light spill from external artificial lighting into the watercourse or adjacent river corridor habitat. A lighting survey shall be carried out to show that the lighting scheme for the development will not be greater than Lux level 0-2 in the buffer zone. The Environment Agency considers background levels to be a Lux level of 0-2. Artificial lighting should be directed away from the river corridor and focused with cowlings. If this cannot be achieved then the development should be moved back from the watercourse until the lighting levels within 8 metres of the top of bank of the river are maintained at background levels."*

I therefore request that a survey of current light conditions be carried out to enable the impact of the proposed lights be ascertained, and that the ecological advisors within the EA be consulted on this issue.

Given that the school grounds are adjacent to the Rushmoor BC owned Aldershot park, which already has floodlit pitches away from the ecologically sensitive zones has the option of converting one of these to an all weather surface been considered.

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