
Report To:	The Planning Board	Date:	4th March 2009
Report By:	Head of Planning and Housing	Report No:	08/0157/IC Plan 03/09
Contact Officer:	Jane Shields	Contact No:	01475 712423
Subject:	Erection of six lighting columns each carrying two 2KW metal halide floodlights at Birkmyre Park Playing Fields Knockbuckle Road Kilmacolm		

SITE DESCRIPTION

Birkmyre Park is located within an established residential area. Within the park Broomknowe Road separates the playing fields from the recreation ground. Within the playing fields there are two pitches, currently used for rugby.

PROPOSAL

It is proposed to erect six 12 metre high columns, each carrying two metal halide floodlights, on the second team pitch which lies close to Broomknowe Road. A metal control cubicle which would measure 750mm X 750mm X 350mm is also required. The applicant has stated that the primary users of the floodlights would be Birkmyre Rugby Club on Tuesday and Thursday evenings between 19.00 and 21.00 hours and on Saturday afternoons during the winter (no more than 5 times per year/finish before 1800 hours). St.Columba`s School will also use the facility for after school rugby coaching sessions up to 18.00 hours on weekdays. The applicant has also stated that the lights may be used by other groups that arrange lets with Inverclyde Leisure.

The original plans contained inaccuracies and revised plans were submitted to address the inaccuracies.

LOCAL PLAN POLICIES

Local Plan Policy LR1- Safeguarding Open Space

Inverclyde Council, as Planning Authority, will support, safeguard and where practicable, enhance:

- (a) areas identified as 'Open Space' on the Proposals Map;
- (b) other areas of open space of value in terms of their amenity to their surroundings and to the community and their function as wildlife corridors or wedges; and
- (c) where appropriate, encourage other relevant and compatible development for the purposes of leisure, recreation and sport.

Local Plan Policy LR3 - Provision of Recreation and Sports Facilities

Development of leisure, recreation and sports facilities within the built-up area will be assessed against the following criteria:

- (a) the potential detrimental impact upon neighbouring land uses and in particular, residential amenity in terms of excessive noise, overspill floodlighting, disturbance, traffic congestion and road safety and parking;
- (b) the potential impact on Inverclyde's heritage resource;
- (c) the potential impact upon the vitality and viability of an existing centre, where appropriate;
- (d) the application of the 'town centre sequential test'(*), where appropriate; and
- (e) other relevant Local Plan policies.

Local Plan Policy H1 - Safeguarding the Character and Amenity of Residential Areas

The character and amenity of existing residential areas, identified on the Proposals Map, will be safeguarded, and where practicable, enhanced. New residential development will be acceptable, in principle, subject to other relevant Local Plan policies.

PAN 82 Local Authority Interest Developments and Circular 5/07 Notification of Planning Applications require to be taken into consideration.

CONSULTATIONS

Head of Environmental Services – The lux values shown on the revised plans indicate an increased light level on the surrounding roads of a factor of 10 in some locations. The horizontal lux values are in excess of the recommended 5 lux for this type of environmental zone and it is expected that the vertical lux values would be greater. Baffles will be required on the floodlights to avoid lightspill outwith the playing area and to ensure compliance with Scottish Government guidance.

PUBLICITY

The application was advertised in the Paisley & Renfrew Gazette on 27th August 2008 as a Potential Bad Neighbour Development

SITE NOTICES

The nature of the proposal did not require a site notice.

PUBLIC PARTICIPATION

Six letters of representation have been received. Five of the letters contained objections whilst the representation from the Kilmacolm Civic Trust confirmed that they had no objections. The nature of the objections can be summarised as follows.

- 1.The proposed floodlights will shine through the windows of adjacent houses thereby causing nuisance.
- 2.The proposals will have a detrimental environmental effect on the park and the surrounding area.
3. The proposed floodlights will encourage rugby to be played more often than at present which would create more noise pollution.

4. The use of the floodlights should be restricted to no more than three evenings per week and no later than 9.30pm.
5. The proposed columns would represent an additional permanent visual disruption to the current appearance of Birkmyre Park during the hours of daylight.
6. The proposed floodlights will cause additional light pollution, increasing energy usage and probably disrupting the nocturnal activities of owls and bats.
7. There would be the possibility of 24 hour sports activities once the floodlights were erected, with the associated vehicle and people movements, which would change the character of the area during the hours of darkness.
8. If the proposals are approved this could create a precedent for further floodlighting of pitches within Birkmyre Park.
9. Greater use of the pitches will make the grass surface less pleasant for residents and visitors wishing to enjoy the park.
10. The columns could pose a safety hazard, for those erecting and maintaining them, those walking near them and those tempted to climb or vandalise them.
11. The proposed floodlights could present a safety hazard to pedestrian and vehicular traffic.

ASSESSMENT

The material considerations in the assessment of this application are the Development Plan, the consultations response, representations received and PAN 82 and Planning Circular 5/07.

The site is covered by Policies LR1. and LR3, with Policy H1 being relevant since the site is surrounded by residential properties.

Policy LR1 states that the Council will safeguard and where practicable enhance the areas identified as "Open Space" on the proposals map. It is also stated that the Council would wish to encourage and support the improvement and /or addition of new facilities where these would lead to an increase in the use of a formal open space such as a park, playing field or other maintained open space, and therefore protect its future. The proposals are therefore in accordance with LR1.

Policy LR3 states that the development of leisure, recreation and sports facilities within built up areas will be assessed against the potential detrimental impact upon neighbouring land uses and in particular, residential amenity in terms of excessive noise, overspill floodlighting, disturbance, traffic congestion and road safety and parking. Policy H1 requires safeguarding of the character and amenity of residential areas. Since the site comprises of public playing fields with residential properties across the road, an element of noise and disturbance associated with the use is to be expected. While the floodlights may lead to the use of the facility over a longer period, I note that the floodlighting is limited to 1 pitch. With regard to the possibility of overspill floodlighting, the Head of Environmental Services has recommended that baffles be fitted to the floodlights to ensure that lux levels do not exceed 5 lux within residential properties and to prevent glare to pedestrians and motorists. Furthermore, the Head of Environmental Services has expressed no concerns regarding either traffic congestion or parking. While I note the visual impact of the floodlights and recognise that the floodlighting columns will be visible to nearby residents during the daytime, they are a feature of most modern sporting facilities and it is need not be inappropriate to erect such structures within a public park. In summary, I consider the proposal complies with Local Plan policies LR3 and H1.

I have no reason to believe that the columns will pose a safety hazard as suggested by objectors. The site is part of a public park where there is activity already and on balance I must consider the community benefits of the proposals.

With regard to development in which planning authorities have an interest, Circular 5/07 advises that they should be referred to the Scottish Government in circumstances where the proposed development would be contrary to the development plan for the area or has been the subject of a substantial body of objections. PAN 82 provides guidance on what might constitute a substantial

body of objections. In this particular case I do not consider that a substantial body of objections has been received and conclude that the application does not require to be referred to the Scottish Government.

RECOMMENDATION

That the application be granted subject to conditions:

Conditions

1. That the development to which this permission relates must be begun within five years from the date of this permission.
2. That the lux levels shall not exceed 5 lux within residential properties, and prior to the floodlights hereby permitted being brought into use, they shall be fitted with baffles.
3. That the floodlights shall not be used on any day after 10.00pm.

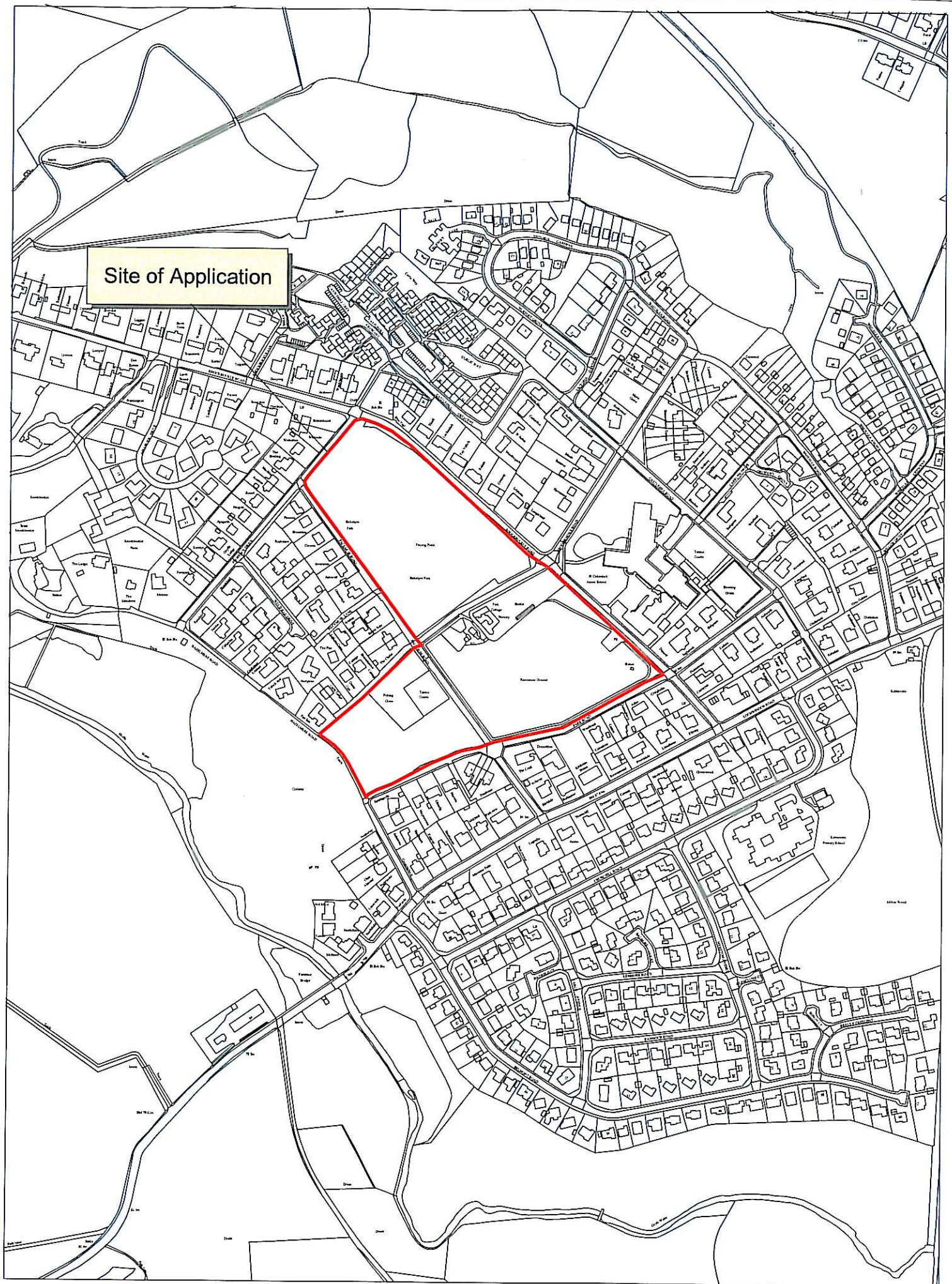
Reasons

1. To comply with Section 58 of the Town and Country Planning (Scotland) Act 1997.
2. In the interests of residential amenity and to prevent glare to drivers and pedestrians using adjacent roads.
3. In order to protect the amenity of adjacent residential properties.

F. K WILLIAMSON
Head of Planning and Housing

BACKGROUND PAPERS

1. Application Form.
2. Application Plans.
3. Representations received.
4. Consultation response.
5. Inverclyde Local Plan.
6. PAN82
7. Circular 5/07.



Site of Application



Date: 11:02:09

Drawn: IAC Drg. No. 08/0157/IC



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Inverclyde
council
planning and housing

KILMACOLM CIVIC TRUST
(Scottish Charity No SCO 32744)

11 FEB 2009

From: Mr RN Cameron

Kaladan
Lochwinnoch Road
Kilmacolm
PA13 4DY

4529
R

Mr FK Williamson
Head of Planning Services
Cathcart House
6 Cathcart Square
Greenock PA15 1LS

9th February 2009

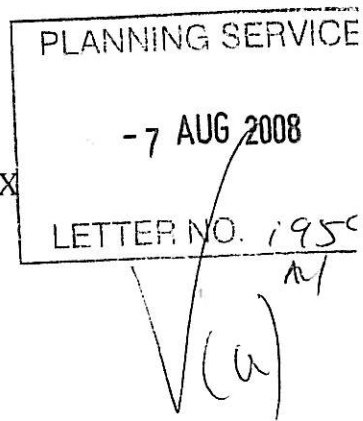
Dear Mr Williamson,

PLANNING APPLICATIONS: Period 16 Jan 09 - 09 Feb 2009

The executive committee met at 7.30 pm on Thursday 5th February 2009. In addition to other business we reviewed planning applications affecting Kilmacolm and its local area published by you and lodged at the Kilmacolm Library during the period 16/01/09 - 05/02/09. Our decisions are summarised in the table below:

08/00157/JC Ward: 1	<u>Rugby Pitch,</u> <u>Birkmyre Park,</u> <u>Kilmacolm</u> Floodlighting (amended plans).	<u>Comment.</u> No objection.
09/00012/JC Ward 1	<u>Plot 2, Avanel,</u> <u>Knockbuckle Road,</u> <u>Kilmacolm</u> Construction of 2 storey house with detached garage.	<u>Comment.</u> No objection in principle. However we are concerned that the detailed plan may include the installation of high powered external security lights at the front (east side) of the property, and all-night lights on the flanks of the driveway leading to the front door. We ask that you ensure that these do not have an adverse intrusive effect on the adjacent property known as "Torwood".
08/00019/LB Ward 1	<u>Listed School Building,</u> <u>New Community Centre</u> <u>Kilmacolm</u> Alterations to form Library and Commercial Area.	<u>Comment.</u> No objection in principle. However, the whole 'New Community Centre' project is going to cause considerable disruption to parking whilst construction is in progress. This and the effect that other projects in the centre of the village will have on parking need to be tackled in-the-round and not viewed in a piecemeal fashion. The Civic Trust is preparing a paper on the whole issue of parking and traffic flow within the town of Kilmacolm. We intend to present the paper to

P. E. G. Aldsworth
Fedala, Knockbuckle Road, Kilmacolm, Renfrewshire, PA13 4JX
Telephone 01505 872191



Inverclyde Council,
Head of Planning, Housing and Transportation,
Cathcart House,
6 Cathcart Square,
Greenock,
PA15 1LS.

Ref: Birkmyre Rugby Club Floodlighting

6th August 2008

Dear Sir,

I wish to register my objection to the proposed erection of floodlights in Birkmyre Park. The park is a village amenity for the benefit of all. Organised sport is permitted and indeed should be encouraged but without detriment to other users. Nor should anything be done that would damage the park and its value to the village.

Implementation of the proposal would have a detrimental environmental impact on the park and the surrounding area. It would also have adverse safety and amenity implications.

The application appears to be misleading in that it refers to the erection of six floodlights. Close study of the Abacus drawing attached to the application reveals that twelve floodlights, totalling 24kW, mounted on six masts is intended. There is also mention of spot lamp replacement in the key and it is unclear whether this refers to replacement of individual floodlamps or spotlamps. If it refers to spotlamps they are not shown on the plan or mentioned in the application.

1. Environment

a. Light emanating from the floodlights cannot be prevented from affecting a large area outwith the confines of the park. The glow from temporary floods, used for the last few seasons during training sessions, has been visible from a considerable distance and at certain places the lights are visible on main roads (e.g Port Glasgow Road). No objection was raised to the temporary lighting as training facilities were poor due to the very poor state into which facilities in the vicinity had been allowed to fall.

b. The extent and levels of lighting predicted are far in excess of that which would be required for normal training purposes. This would indicate that the intention is to be able to play matches under floodlighting. This would increase the level of noise pollution, caused by players, spectators and traffic, to the detriment of resident's comfort and well being.

c. As the masts will be approximately 30 metres from the front windows of my, and my neighbour's homes, and 2 metres above floor level, there would be unwanted and unnecessary light pollution affecting our homes.

d. In view of the ongoing debate concerning climate change and energy saving this

installation would constitute an unnecessary increase in energy consumption.

- e. The use of floodlights could adversely affect nocturnal wildlife.

2. Safety

- a. The erection of the masts and control gear would introduce a safety hazard for other park users especially children.

- b. The intensity of the light could present a safety hazard to pedestrian and vehicular traffic and access to nearby properties. Difficulty was experienced from the temporary lights used in previous seasons.

3. Amenity

The park provides a safe environment for children to play and enjoy outdoor activities.

By erecting masts in the park its value and use to other villagers and groups would be diminished, if not eliminated. As is normal in a village the activities are subject to changes in the ages and enthusiasms of residents. This normal fluctuation led to a period, a few seasons ago, when little or no rugby was played. At other times there have been periods when football, hockey, cricket and lacrosse have been played. Currently there appears to be a resurgence of football. Other sports, games and activities may well develop in the future and masts mounted in the middle of the field could prevent them.

With the opening of the fitness facilities the need for open training in the park should be greatly reduced, if not eliminated. The amount of lighting proposed is far greater than the temporary system used previously.

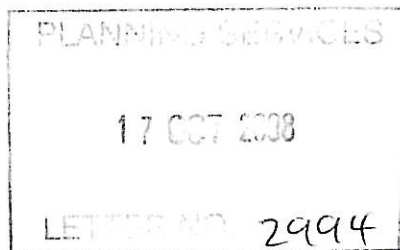
The rugby club is not, and cannot be, the sole user of the park. Other sports and activities have taken place over many years without the need for floodlighting. If the availability of floodlighting for training is essential for the continued functioning of the rugby club alternative measures should be found which have a much less damaging effect on the park and the environment.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'P. E. G. Aldsworth', written over a horizontal line.

P. E. G. Aldsworth

Inverclyde Council
Head of Planning
Housing and Transportation
Cathcart House
6 Cathcart Square
Greenock
PA15 1LS



Mr David McLeod
Oronsay
Knockbuckle Road
Kilmacolm
Renfrewshire
PA13 4JX

14th October 2008

**re: Application 08/0157/IC
Birkmyre Rugby Club - Erection of Floodlighting
Planning Objection**

Dear Sir/Ms,

I write to express my concern and to raise an objection to the proposed development at Birkmyre Park involving the floodlighting of a rugby pitch.

I have broken my observations and objection into sections for clarity:

1. Current Usage

For information, the playing fields concerned with this application are currently used as follows:

- 1.1. The rugby pitch in question is in use during school hours on weekdays by Saint Columba's School of Knockbuckle Road, Kilmacolm.
- 1.2. The rugby pitch is used during evening hours on two weekdays per week as a training ground by Birkmyre Rugby Club. To facilitate this, the club uses temporary floodlights mounted in trees at the South East edge of the playing fields to illuminate approximately half the width of the second team pitch as marked in the applicant's Site Plan.
- 1.3. Both rugby pitches are used during daytime hours on weekends for match play by Birkmyre Rugby Club. The club has a significant following of supporters who turn out to view their matches and cheer on their team. There being no formal parking for supporters and to avoid obstructing Knockbuckle and Pacemuir Roads, both home and visiting team spectators park on the verges at the boundary of the playing fields on these roads. Although these verges appear as pavements on the Site Plan, the sides nearest the playing fields are simple grass verges.

I view the current use, with limited evening activity, as being in balance with and consistent with the rural and residential village setting, and in keeping with the close proximity of neighbouring domestic properties. The limited range of the existing temporary floodlights concentrates evening use in the South Eastern end of the park where participants are furthest from neighbouring properties. With rugby being a vocal and boisterous sport, this concentration of participants away from neighbouring properties keeps noise nuisance to a minimum on otherwise quiet evenings. Also, there are no supporters present during current evening use.

2. Ongoing Use

This section describes the uses that a floodlit rugby pitch could be put to and discusses the potential conflict that these uses could bring to neighbouring properties with particular reference to increased intensity of use and noise disruption.

2.1. Absence of Control

As I understand the planning system, if the application is granted as presented, neighbouring properties and the Council will have little or no control over the ongoing use of the floodlit facilities. Whilst a curfew may be imposed as a planning restriction, perhaps at 9 or 10pm each evening, there can be no restriction on the intensity of use that the playing field could be put to in those evenings. The applicant could choose to use the facility, or permit its use by others, until curfew as many as five or even seven evenings per week without concern for the disruption that such use could cause to close neighbours.

2.2. Practice Play Location

The current lighting situation has proved adequate for training purposes for many years yet the applicant is now seeking to floodlight the entire pitch. The lighting of the South East half of the second team pitch has concentrated practice play in this area which is furthest from neighbouring properties and minimises noise disruption to their occupants. By floodlighting the whole pitch we can expect the full area of the pitch used for practice which would bring players far closer to neighbouring properties than before. This would increase noise disruption to the occupants of those properties on otherwise quiet rural evenings. Please note that although the lighting masts themselves are some forty five metres from neighbouring properties the edge of the field of play, and hence the source of noise and disruption, is much closer at only some twenty two metres from neighbouring properties.

2.3. Evening Play Matches

It is not necessary to have the full pitch floodlit for training purposes but it would certainly be required if the club wished to expand their use of the facilities to include evening time playing of match fixtures. The applicant may deny that such use is intended but if planning is granted then there would be no obstacle to evening match play on as many evenings per week as they choose. Evening match play would bring much additional traffic in the form of spectators to an area which currently enjoys quiet rural evenings. Additional traffic brings additional spectator parking which experience tells us will be on grass verges not designed for this purpose. Damage to verges by traffic movement is likely. Also, rugby supporters are both vocal and boisterous, and adding spectators to evening sessions would dramatically increase the noise levels experienced by the near neighbours of these facilities during normally quiet rural evenings.

2.4. Third Party Use

A floodlit rugby pitch may well be hired out for evening use to third parties from neighbouring villages or towns where such facilities are lacking. Such intensive use would raise the same problems as described for Evening Match Play above but at a higher level still due to increased frequency of use.

The uses described above, that a floodlit pitch may be put to, demonstrate an intensity of use that is many times greater than the facilities are currently put to. In my opinion, the potential increased frequency and intensity of use combined with an increase in the noise disruption likely to occur during evening use of a floodlit facility is inconsistent with the rural location and the proximity of neighbouring properties.

3. Light Pollution

The applicant has provided a plot of light distribution at various points and distances from the proposed lighting masts. This provides a contour map of light levels but does not show where these light levels are in relation to neighbouring properties. In view of the importance of seeing the light distribution as it relates to the site, I have combined images supplied by the applicant to show a light level contour map over the whole site. This is attached as Figure 1: Overlay of Applicant's Light Level Distribution over the Detailed Site Map. The information contained in this plot is entirely based on the information provided by the applicant and the accuracy of scaling of the two plots is ensured by matching and superimposing the positions of the lighting masts. Observations based on this plot are shown below:

3.1. Extent of Lighting

From the combined lighting plot and site plan, figure 1 attached, it is clear that the area affected by the floodlighting is huge. When in use, the light will dominate the environment of the park from end to end, it will overspill onto adjacent roadways and gardens, and will shine directly into the windows of a number of neighbouring properties.

3.2. Lighting Nuisance

The Institution of Lighting Engineers issues guidelines for the design of lighting installations to reduce the likelihood of Lighting Nuisance^[1]. For village and quiet urban locations such as Kilmacolm, the Institute recommends a light level limit of 5 Lux be applied when assessing light pollution on neighbouring properties.

The combined lighting plot and site plan, figure 1 attached, shows contour lines of 50, 25, 10, 5 and 2 Lux. Only the outermost contour, with a value of 2 Lux, is below the lighting nuisance limit. The plot shows a nuisance level of light encroaching on a number of neighbouring properties and in the case of the property Bright Side at the South West corner of the playing field the level is between 10 and 25 Lux which is between 2 and 5 times the nuisance limit for light trespass.

The degree by which the lights dominate the environment of the park and the surrounding properties suggests that this development is not in keeping with the quiet rural environment of this part of the village. Added to this, the appearance of light levels exceeding statutory nuisance levels on adjoining properties suggest that this is an inappropriate development.

4. Other Nuisances

As briefly touched on in other sections above, Birkmyre Park is located in a quiet rural environment without any formal arrangements for parking and with surrounding soft verges of grass. The likely increase of evening use of the facilities caused by floodlighting and the likely increase in the number of spectators is likely to stretch local parking provision and lead to damage of the soft roadside verges through inappropriate parking.

5. Conclusions

The current usage of the rugby facilities at Birkmyre Park is in balance with the quiet rural setting in which they reside.

The proposed floodlighting development opens the door to an uncontrolled and unprecedented increase in the level of late evening use of the facilities with attendant noisy disruption that may well occur as late as 10pm at night and on as many as 7 days per week.


Such a potential night-time usage level is inconsistent with the quiet residential location in which this park resides.

The design of the floodlighting system is such that it will dominate an area far outside the boundary of the playing field and imposes light levels on neighbouring property well in excess of that required to constitute a statutory nuisance.

Such a dominant and non-compliant lighting system is inconsistent with the rural and residential location in which this park resides.

In view of these problems with the proposed development, discussed in detail above, I ask that you recommend refusal of planning permission for the development.

Yours faithfully,

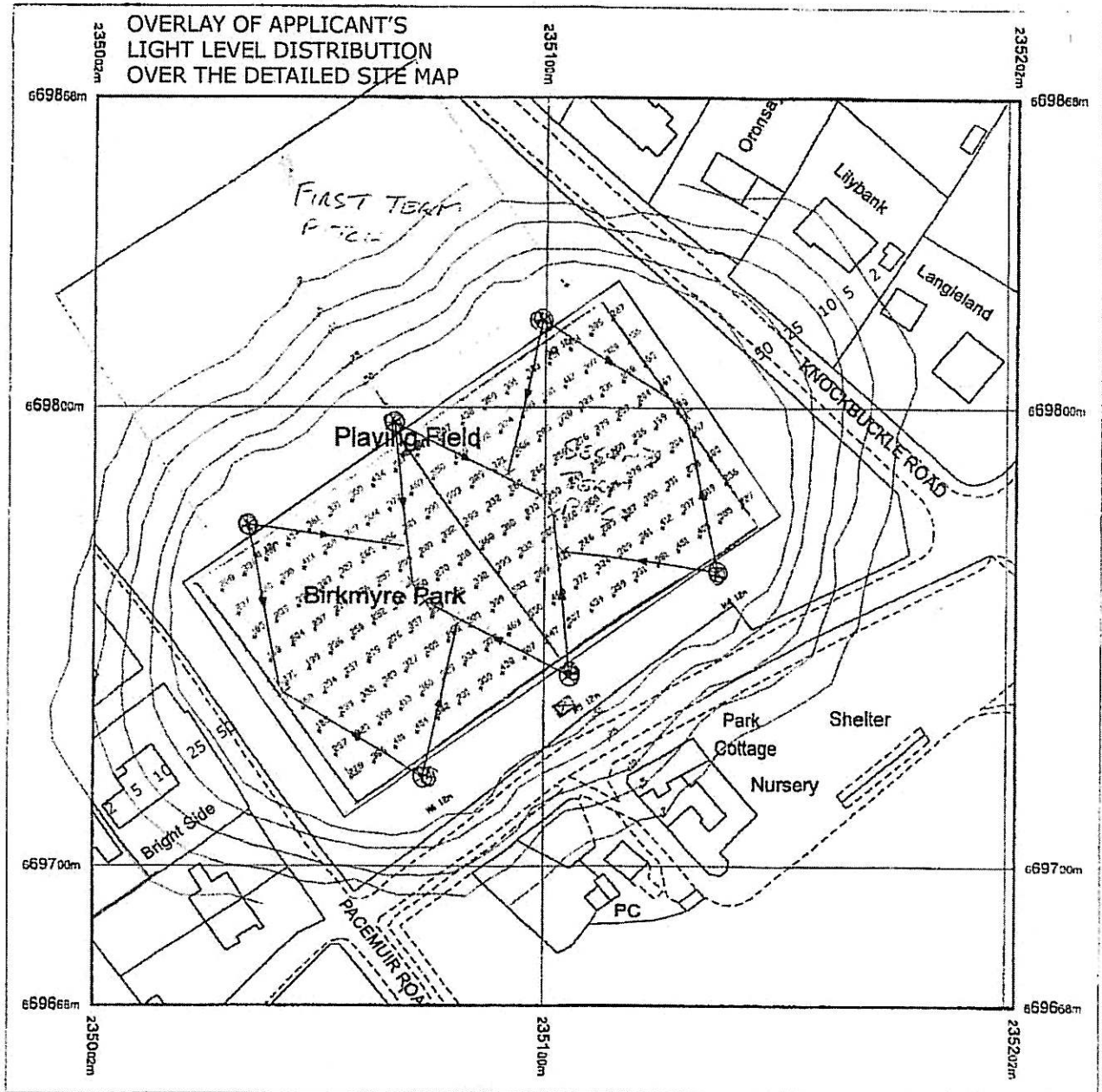


David McLeod

Refs:

- [1] The Institution of Lighting Engineers: Guidance Notes for the Reduction of Obtrusive Light (from <http://www.ile.org.uk>)

Figure 1:



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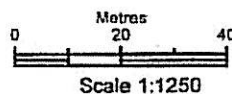
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Legend

⊗ 12M LIGHTING MAST

☒ CONTROL CUBICLE
1200 x 1200 x 600

1438

08/0157/11C

please acknowledge ✓

Jane Shields

From: George Borland [george@georgeb.dialstart.net]
Sent: 09 September 2008 15:28
To: Jane Shields
Subject: Application by Birkmyre Rugby Club to erect 6 high masts carrying 12 floodlights at Birkmyre Park

Dear Mrs Shields

I refer to my telephone conversation last Friday with your colleague, Mr Martin, regarding the proposal by Birkmyre Rugby Club to erect 6No 12m (40 feet) high masts to carry 12 high powered floodlights in Birkmyre Park, presumably for use in the darker evenings.

Whilst I do not want to discourage rugby being played here, I feel a bit concerned that the bright lights may become an annoyance and I would put forward the following points for consideration:

- 1 - Our bedrooms are at the front of the house overlooking the rugby fields. The proposed lights will shine into our windows and the windows of neighbouring houses.
- 2 - The new lights will encourage rugby to be played more often than at present and will exacerbate the above.

In view of the foregoing I would be grateful if the following conditions, which I think are not unreasonable, could be applied in the event that permission is to be granted:

- (a) The lights should be used on not more than three evenings per week;
- (b) The lights should be extinguished not later than 9.30pm.

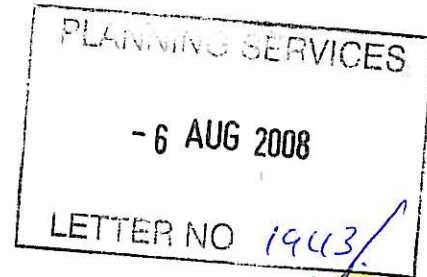
Yours sincerely

G M Borland
Ashcroft
Pacemuir Road
Kilmacolm
PA13 4JJ

Tel: 01505 874144

✓ (u)

Stellenbosch
Florence Drive
Kilmacolm
Renfrewshire
PA13 4JL
Tel: 01505 872038



Inverclyde Council
Head of Planning, Housing and Transportation
Cathcart House
6 Cathcart Square
Greenock
PA15 1LS

3 August 2008

Dear Sir or Madam, **Re Proposed erection of six floodlights at Knockbuckle Road, Kilmacolm by Birkmyre Rugby Club**

With reference to the above proposed development, I have received a "notice for Service by Applicant on Neighbouring Parties" dated 24 July 2008 and wish to make the following representations within the 14 days generously permitted:-

1. This proposed erection of 6x12 metre high lighting masts would represent an additional permanent visual disruption to the current appearance of Birkmyre Park during daylight hours.
2. Once erected, and if used, they will have a detrimental effect on the night-time environment of Birkmyre Park by causing additional light pollution, increasing energy usage and probably disrupting the nocturnal activities of owls and bats, which can be clearly heard, if not seen, during hours of darkness.
3. Once erected, there would be the possibility of 24 hour sports activities, associated vehicle and people movements, which would change very significantly the character and the calm which has been the tradition during hours of darkness.
4. If approved this could be used as a precedent for further floodlighting of pitches on Birkmyre Park
5. Greater use of the pitches will inevitably make the grass surface less pleasant for residents and visitors wishing to enjoy the park as well as current rugby players.
6. Finally the masts themselves could be a safety hazard, both for those erecting and maintaining them, those walking near them (especially in the dark) and those tempted to climb and/or vandalise them.

Yours sincerely

Elizabeth M Foster

Elizabeth M. Foster

Stellenbosch
Florence Drive
Kilmacolm
Renfrewshire
PA13 4JL
Tel: 01505 872038

PLANNING SERVICES

- 6 AUG 2008

LETTER NO. 19/L/L


Inverclyde Council
Head of Planning, Housing and Transportation
Cathcart House
6 Cathcart Square
Greenock
PA15 1LS
3 August 2008

Dear Sir or Madam, **Re Proposed erection of six floodlights at Knockbuckle Road, Kilmacolm by Birkmyre Rugby Club**

With reference to the above proposed development, I have received a "notice for Service by Applicant on Neighbouring Parties" dated 24 July 2008 and wish to make the following representations within the 14 days generously permitted:-

1. This proposed erection of 6x150 metre high masts would represent an additional permanent visual disruption to the current appearance of Birkmyre Park during daylight hours.
2. Once erected, and if used, they will have a detrimental effect on the night-time environment of Birkmyre Park by causing additional light pollution, increasing energy usage and probably disrupting the nocturnal activities of owls and bats, which can be clearly heard, if not seen, during hours of darkness.
3. Once erected, there would be the possibility of 24 hour sports activities, associated vehicle and people movements, which would change very significantly the character and the calm which has been the tradition during hours of darkness.
4. If approved this could be used as a precedent for further floodlighting of pitches on Birkmyre Park
5. Greater use of the pitches will inevitably make the grass surface less pleasant for residents and visitors wishing to enjoy the park as well as current rugby players.
6. Finally the masts themselves could be a safety hazard, both for those erecting and maintaining them, those walking near them (especially in the dark) and those tempted to climb and/or vandalise them.

Yours sincerely


Geoffrey A. Foster