



Wilpshire Wanderers Football Club

(Established 1997)
Promoting a Team Spirit



Laura Eastwood
Ribble Valley Borough Council

20 Aug 2020

Dear Laura

I understand that Langho Juniors have made an application for a full size 3G pitch and you are dealing with this application.

We would definitely support this application and be interested in exploring the usage of this potential facility for both training and matches. We have 23 squads ranging from U7s through to U16s playing on both Saturday and Sunday and feel there is definitely the need for another 3G facility in the Ribble Valley. Currently to have regular access to a 3G facility we must travel to Our Lady's and St John School in Blackburn.

We are therefore in full support of the application and looking forward to hearing how it progresses.

Yours Sincerely

A large black rectangular redaction box covering the signature of the Club Secretary.

Club Secretary

Club Chairman – Mr S.T. Frost

Laura Eastwood

From: [REDACTED]
Sent: 21 August 2020 17:20
To: Laura Eastwood
Subject: Fwd:

Dear Laura,

>

> My name is Neil Walsh and I am the lead coach for the u14s Hyndburn and Ribble Valley district football team.

>

> I am emailing you in connection with the above planning application for a new full size 3G football pitch at The Ridings in Langho. In my opinion the Ribble Valley has a huge shortage of full size 3G pitches, and we have been crying out for something like this for years. I am always struggling to hire quality pitches for my teams. Demand in the area for facilities like this way outstrips supply, and I would 100% hire and use this facility if it was available.

>

> I hope this goes ahead as it would be a massive step forward for football in the area, which obviously has a knock on positive effect to health and welfare of local children and youths.

>

> I wish Langho FC the best of luck with the application. Should you require any further information please do not hesitate contact me.

>

> Regards

>

> Neil Walsh

[REDACTED]

>

Laura Eastwood

From: [REDACTED]
Sent: 20 August 2020 14:08
To: Laura Eastwood
Cc: [REDACTED]
Subject: Planning ref number 3/2020/0315

Good afternoon Laura,

My name is Chris Hutchinson and I am the lead coach for the Hyndburn and Ribble Valley district football team at u13 level. I am also the coach for Great Harwood Rovers in the local leagues.

I am emailing you in connection with the above planning application for a new full size 3G football pitch at the Ryddings site in Langho. I just want to add (for what it's worth) my support to this application. Our area has a huge shortage of full size 3G pitches and we have been crying out for something like this for years. I am always struggling to hire quality pitches for my teams for games and training. If this goes ahead this would be perfect. As a local football coach I would 100% hire and use this facility if it was available.

I really do hope this goes ahead as it would be a massive step forward for grassroots football in the area which obviously has a knock on positive effect to health and welfare of local children and youths.

I wish Langho FC the best of luck with this application. A fantastic club run by wonderful volunteers.

If you need anything further from me please do not hesitate to give me a call or send me an email.

Regards

[REDACTED]
[REDACTED]
[REDACTED]

7

Laura Eastwood

From: [REDACTED]
Sent: 20 August 2020 11:18
To: Laura Eastwood
Cc: [REDACTED]
Subject: Planning Application 3/2020/0315 - Langho Football Club.

To whom it may concern

I am the league secretary for the Accrington & District Junior Football League.

Our league covers a 20-mile radius from Accrington Town Hall, we have over 200 teams, 3000 players that play in our league each season which runs from September to end of April.

On average we schedule across the season over 2000 games across 10 age groups from U7s to U16s. From November through to end of March we move majority of games onto 3G

Figures wise in 2018-2019 season we had 216 games cancelled on grass due to unplayable pitches from the rain or ice.

We played an average of around 1227 games on 3G pitches

In 2019-2020 season we had 147 games cancelled on grass due to unplayable pitches from the rain or ice.

This figure is lower due to us having more access to more 3G pitches than in previous seasons, and us also moving games onto 3G earlier due to the horrendous wet weather throughout the end of Sept and into October.

We played an average of around 1539 games on 3G which is an increase of 312 games.

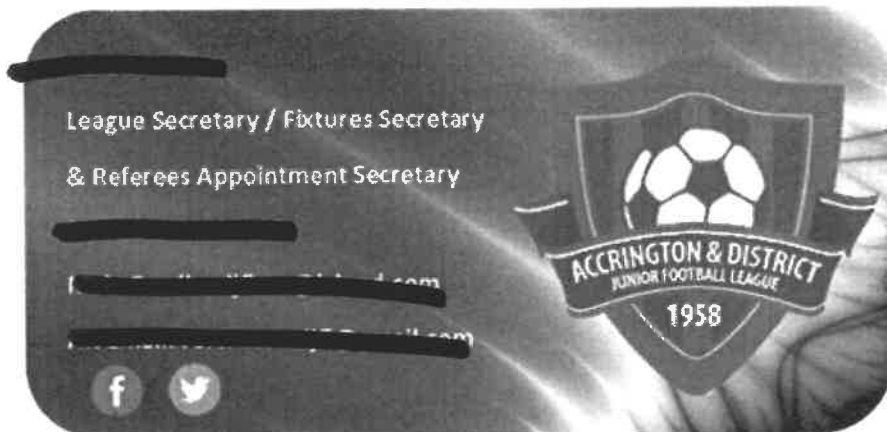
These figures show us the greater need for 3G pitches to allow games to be played, due to the poor condition of our local grass pitches which get no investment due to government cuts to our local borough councils.

If we did not have use of 3G pitches the number of games being cancelled due to unplayable grass pitches would easily triple each week.

As a league we are always on the lookout for more 3G pitches that could be available to us, as we feel it is important to keep the youth in our league playing as much as possible week in week out.

We would fully support any application for a new 3G pitch within our leagues district.

Regards



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This communication has originated from the ADJFL league secretary email service.



Creative Football
Witton Park Astro turf
Preston Old Road
Blackburn
BB2 2TP

REF 3/2020/0315 Langho 3G Pitch

Dear Laura,

We are a non-judgmental and fully inclusive charity based and working in East Lancashire. Promoting recovery, wellbeing and independence for men and woman.

We use the power of football to encourage all genders, age and backgrounds to engage with our projects. This helps adults to talk and we find it educates and gives an understanding into mental health illnesses.

We call this football therapy and this offers social inclusion, support, way back into competitive and grassroots football. Our sessions also offers new friendships and connections. We find it also improves people's confidence, self-esteem, and weight loss, physical and mental wellbeing.

Our sessions are fun, affordable, relaxed and are in very safe surroundings, with our volunteers receiving appropriate training.

We also offer support and offer courses such as FA LEVEL 1, FA refereeing, mental health first aid etc.

These projects have also done great work with the community and helped others who may not access our projects to get involved.

During lockdown we ran #ProjectBridge, where we asked adults and children to create colorful signs with positive words. We then collected them and with many volunteers we put them on motorway bridges to try and prevent potential jumpers.

Another project, we delivered 40 Easter eggs to vulnerable adults who may have been socially isolated during the pandemic.

Working with the Butlers Arms, Pleasington we helped them distribute over 100 Care parcels containing essential food supplies, books and activities packs for families in need.

This is more than a game, its more than football, we're a big family who encourage communities from different backgrounds to come together and help each other.

Having a venue in Langho would offer all of the above and much more than just football sessions to a rural local community. This would offer support for 52 weeks of the year as proven in Blackburn, Darwen and Chorley.

Please feel free to check out all of our work on social media and YouTube. We're currently in the middle of finalizing our website.

I will add links and videos for all of our umbrella projects - Blokes United, Girls United and the Social Inclusion Football League.

Yours Sincerely

Paul Davies, Paul Hardman and Wayne Beck

Creative Football, Blokes United, Girls United and Social Inclusion Football League

From: [REDACTED]
Sent: 01 July 2020 17:12
To: Planning
Subject: Re 3/2020/0315

EXTERNAL - This email originated from outside of Ribble Valley Borough Council . Do not click links or open attachments unless you recognize the sender and know the content is safe.

Planning officer Laura

This is confirmation that I object the proposal on the recreational land at Langho FC.

Under their lease it is not permitted and should stay as open recreational land as supply by the Petrie estate in years past.

Can you also look in the reason this areas was not developed when The Riding and The Dales was given permission for build as this area was not for any development as per Ribble Valley.

In 2012, planning application 3/2012/0225 Langho FC, build an outside all weather pitch, I did not object to this at the time as it was hidden by trees and there would be a small amount of noise and light pollution.

However, currently Langho FC do not look after this pitch ie:

Have not finished off the site from 3/2012/0225 ie pathways.

In this area alone, Rubbish is left constantly.

They play after 22.00 midweek

They attendees are noisy in the evening and disturb the area

The lights from this area alone shine cause light pollution in the winter evenings.

Dump rubbish in the trees

Some players are aggressive in their shouting whilst the matches play.

Langho FC Club generally do not look after the area or the residence and this will make it worse for all.

Parking: During busy times there is Double parking on the entrance to the Ridings and block Dewhurst Road area, this will not help with the additional parking as 6 pitches will bring more that the additional parking required within their plan. I have been blocked in on numerous occasions as they do not realise houses are down the lane.

The Football pitch is left with rubbish, plastic bottles etc., current it is very clean due to covid19. Not cleaned up or bins emptied.

There will be additional damage to trees that were already taken down on the application from 2012, hence affecting wildlife, not only through additional habitat being taken but by light and noise pollution.

There will be excess noise in the area and affect residence nearby.

The site of the proposal will be large and not in keeping with the area

Dewhurst Road, we have to fight for this to be maintained by the council and additional traffic will again cause issues to the road.

There is additional land near Northcote manor that Langho FC use and there is no residential estate there, this should be considered.

Locals will be pushed to walk elsewhere as this recreational area will now be a ¼ of the same amount of grass to walk, the only way to walk will be to go on the A59 walk down to green spaces, this is a dangerous road and recently an individual from the area was killed crossing.

Thank you for reading the above.

Kind regards

[REDACTED]

[REDACTED]

Dewhurst Road

Langho

Blackburn [REDACTED]

[REDACTED]

LE

From: [REDACTED]
Sent: 01 July 2020 21:04
To: Planning
Cc: [REDACTED]
Subject: Objection re Planning Application No 3/2020/0315

EXTERNAL - This email originated from outside of Ribble Valley Borough Council . Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Sir/Madam,

We write following receipt of your letter regarding the proposal to construct an all weather football pitch with boundary fencing and floodlights and an extension of the existing car park at Langho Sports & Social Club, Dewhurst Road, Langho, BB6 8AF.

We would like to notify you of our objection to this construction for the following reasons:

- Part of the access is not adopted by the council. This area is full of potholes and leads to the Conkers Children's nursery and the Sanctuary of Healing which leads to conflict between road users to the car park entrance. This is an unlit narrow road with no footpath and the increased traffic could lead to many potential accidents. Additional traffic to the proposed new construction would add to this and is not appropriate in a residential area.
- The increase in light and noise pollution caused by the proposed floodlights and perimeter fence is unacceptable in a residential area and would be particularly noticeable in this quiet rural setting with the proposed pitch open until 10pm.
- There is a potential for antisocial behaviour when groups leave the pitch and unacceptable noise levels.
- The proposed fencing would be a potential eyesore
- There would be a significant impact on biodiversity caused by the floodlights and fencing. This area is home to many species of wildlife, including bats, barn owls, hares and badgers.
- The area is not well served by public transport so would require use of private vehicles to roads which are not well maintained.
- The area suffers from poor drainage with significant flooding already being experienced on the A59. The proposed artificial pitch would make this problem considerably worse.
- There would be a negative impact on the visual appearance of the estate and the development is not sympathetic to the local area.
- Is there a need for the proposed facility given the recent developments at Roefield.
- The proposed development would lead to a reduction in green space and would have no benefit to the local community.

Yours faithfully

[REDACTED]

**8 The Rydings
Langho**


10 The Rydings

Langho

BB6 8BQ

30/06/2020

Laura Eastwood

Council Offices

Church Walk

Clitheroe

To Whom it may Concern,

In response to the letter that I recently received I am writing to raise an objection to the proposed development for Langho Sports & Social Club in Langho (ref: NC2/3/2020/0315). I have many questions and potential objections and would appreciate that the below is considered:

1. Noise pollution at anti-social hours

We live in a quiet cul-de-sac in what is relatively open countryside, which currently suffers no noise pollution in an evening. I have two very young children whose bedrooms face directly onto the access road and only junction to which the traffic would funnel through. Their bedrooms also look towards the proposed 3G pitch, and I am very concerned about the later opening times and increase traffic noise and general noise (whistles, shouting, banging of balls on the metal fences) that will result in this development. To have large groups of people coming and going every evening right through until 10pm will be very disruptive and 10pm is an unacceptable time. In a built up area, this wouldn't be a problem due to the general background noise of the surrounding area, but it is very quiet here, and sudden upticks in noise and traffic would have a significant impact and certainly disrupt sleep and wellbeing of my household and our neighbours.

I am also concerned that the busses seem to have an "unmarked" bus stop at the very bottom of our garden, and large groups of youths here would be very disruptive. I am not sure if this is formally a bus stop? (which is perhaps another question?).

2. Anti-social behaviour & Littering

We frequently suffer the loud anti-social noise from the club when they have DJ's performing late on a Saturday evening, but given this is only on a weekend therefore we accept this. The concern is that the increased usage of the pitch until late at night would lead to further antisocial behaviour and late-night gatherings. To have significant mid-week disturbance until late in the evening would just be unacceptable. We are unaware of any security currently set up in the area, including CCTV etc. Further to this, there is frequently broken glass, and rubbish

around the pitches and the club house, with limited to no responsibility for tidying up, and providing bins for this. To limit this littering, there would need to be a review of how the land is maintained and tidied up. Because residents walk on the pitches and use the area, many of us frequently collect rubbish and support with this, if this is no longer a public facility free for us to use, then I don't see that this would continue, therefore a review of maintenance would need to be done.

3. Increased traffic

Having two young children, I am very concerned about the increased traffic, and the only access to this development is on what currently appears to be an unadopted road at the very back of my house. People who currently come to watch the match frequently park on the roads around the pitch (which is a hazard), and with increased volumes of people attending, I can't see that there has been any review of the road infrastructure or the need for double yellow lines/speed bumps etc, to lessen the impact and address health and safety concerns?

4. Light pollution

Reading the planning I see that there is a proposal for multiple 15-meter flood lights to be erected. I am aware that there is already one 3g pitch with this lighting erected on the sight (although seems lower than 15meters?). The current pitch is not looking onto any houses, and is surrounded at all sides by woodland, to minimise the light pollution. Unfortunately, the new pitch is in open space, and would be glaring out towards all of the homes that face towards it. I therefore object that these lights must not be allowed on past a certain hour, as again this will cause a disturbance at night-time to my family and other residents. Further to this, when looking at google earth, I see that these new lights would in effect completely "trap" the nocturnal animals and wildlife that live in these trees, and they would have nothing but bright lights to fly into until 10pm. (see next point regarding wildlife).

5. Impact on wildlife/Biodiversity as a result of the light pollution

I frequently walk around the pitches and see bats, owls (I have seen a Barn Owl feeding on the field), and other birds on an evening across the pitches. We have bats nesting in our trees in our garden, and I am quite concerned that the erection of giant flood lights would obstruct their exit route from their nests to feed. Upon looking on google earth, it seems that the addition of the new lights would in effect completely "trap" the nocturnal animals and wildlife that live in the trees down Dewhurst Road and between the two pitches. They would have nothing but bright lights to fly into until 10pm (which I have read can trap them and result in significant damage and sometimes them abandoning their nests). I am not a wildlife expert, but strongly propose that a biodiversity survey should be performed to ensure that wildlife has been fully considered in this application. I would be very sad to learn that in an area such as this, which is a TPO area, and therefore clearly sustains a high volume and mix of wildlife would not need one.

6. Impact on drainage

Earlier this year there were major floods on the A59, and the A59 directly adjacent to the new proposed pitch was closed for a period due to flooding (this was on the local news). It is often

hazardous here as the water collects here, and it is an accident hot spot as a result. By removing the current drainage that the field currently provides, this would no doubt worsen the current situation. I also read that United Utilities have raised concern regarding drainage, so want to ensure that this is properly addressed.

7. Removal of access to what is currently a public place

For years this has been an open space, to which local people can walk and use responsibly. This would no longer be the case, and would be a sad loss to local people, who are landlocked by the A59.

8. Proposed Development not very accessible.

There have been other recent developments to provide this service in Clitheroe and areas where there are formal bus routes, and more locals to use the service. The Rydings is a very quiet residential area, with limited access points.

9. Ugly metal fences and Flood Lights.

Looking at the planning this is currently for a 6-foot solid metal green fence, with giant flood lights. Has anyone reviewed the aesthetics and whether this fits with this setting, given it is in a rural residential area? Planning permission is usually quite strict regarding the erection of fencing, and given the field has been openly accessible to the public for recreation, is this right that it can be closed off? Further to this, if the aim is to close the pitch to the public, then what use would a 6foot solid fence be? Surely this would encourage youths to break in. Also, there are horses in the field directly next to the pitch, surely the loud banging of balls against a metal fence will be quite scary for them along with the loud noise that the fence will create.

I thank you for taking the time to read my letter and look forward to learning more about this application. I support the club, but do not see why they need the pitches open until this time to enable Langho FC to train and play matches. I can only assume that this is required so that it becomes an enterprise to make the club profitable, which I do not believe this land was set aside to do.

Kind Regards,



LE

Sharon Craig

From: Lorraine j [REDACTED]
Sent: 01 July 2020 15:56
To: Planning
Subject: application 3/2012/0225

EXTERNAL - This email originated from outside of Ribble Valley Borough Council . Do not click links or open attachments unless you recognize the sender and know the content is safe.

RE Langho FC Club, Dewhurst Road., Langho, Blackburn. BB6 8AF

Previous Planning officer [REDACTED]

After looking at a new application I would like some confirmation that all areas within the application was satisfactorily completed: section 7, cut and below. There is no report on the planning from the Countryside officer to refer to to check what was agreed, I expect, as per your letter that the pedestrian path should lead totally around from T1 to T23.

This is not the case and would appreciate clarification of what was agreed separate to the decision letter.

The area around the area only has part paths and obstructions and otherwise is fully grassed and is not maintained. I also have concerns that the Club is not adhering to their lease and would appreciate you advising who I need to contact to discuss or email then I can ask them to discuss with the club. ie:

When not in covid19:

Namely: Rubbish not removed from this area after playing, as well as other areas within the LFC grounds.

Dumping: They dump all grass within the tree areas and do not maintain the trees, paths around or keep clean.

Noise: They constantly play (when they have been able to) after 22.00.

Parking: They obstruct the roads.

Look forward to hearing from you and Thank you for your help.

Kind regards

[REDACTED]
[REDACTED]
4 Langho Centre
Dewhurst Road
Langho
Blackburn. [REDACTED]

TEMPORARY ACCESS TRACK

The temporary maintenance access shall be constructed above existing ground level between trees T4 and T6, using load bearing ground plate type protection method on woodchip spread onto ground below plates. The details shall be submitted for approval in writing and shall be constructed, with out excavations, soil stripping or site grading under the supervision of a qualified arboriculturalist in liaison with the local authority's Countryside/ Tree Officer.

SERVICE TRENCH

The service trench shall be constructed between tree T1 and T23/G1 in accordance with Paragraph 11.3 of BS5837 Trees in Relation to Construction [Principles of avoiding root damage during construction] under the supervision of a qualified arboriculturalist in liaison with the local authority Countryside/Tree Officer. The details/method statement for this work shall be submitted to and approved by the local planning authority.

PERMANENT PEDESTRIAN PATH

On completion of the service trench the permanent pedestrian access path shall be constructed using a two dimensional grid/three dimensional load spreader and fill Geo-grid system, the details of which shall be submitted for approval and constructed under the supervision of a qualified arboriculturalist in liaison with the local authority Countryside /Tree Officer.

REASON: In order to prevent root damage and ground compaction near to trees protected by a tree preservation order, to ensure the long-term survival of trees under which an access road/path cannot be avoided.

In order to maintain an established healthy Rhizosphere thereby safeguarding the long-term survival of protected trees.

LE

From: [REDACTED]
Sent: 25 June 2020 16:53
To: Planning
Subject: PLANNING CONSULTATION 3/2020/0315 LANGHO SPORTS AND SOCIAL CLUB
DEWHURST ROAD LANGHO BB6 8AF

EXTERNAL - This email originated from outside of Ribble Valley Borough Council . Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Sir/Madam,

With regard to the above application, I think this would be an eyesore and totally unsuited to the area for the following reasons.

The erection of a 20 foot fence with 50 foot lights would dominate what is essentially a residential area. Noise from the existing all weather court can impact us on occasions so a full scale pitch would generate quite unacceptable noise.

Access from and egress to the A59 can be quite difficult as it is and the generation of more traffic without major modification of the junction would be dangerous. When games are in progress visitors park on the Rydings, despite requests to use the carpark, and cause considerable problems for residents; I have no reason to believe this would change for the better.

The planning statement says that surrounding trees will be protected but will be behind a twenty foot fence, in my opinion landscape features are, by definition, to be seen not concealed or obstructed.

I also note that that the site should remain a Community Public Open Space and fail to see how this condition could be reconciled with this plan.

I am sure you are aware that many of the points made in the Planning Statement could more easily be directed against this development and trust permission will be declined.

Yours sincerely,

[REDACTED]
34, The Rydings
Langho
[REDACTED]

Sent from Mail for Windows 10

From: G [REDACTED]
Sent: 25 June 2020 13:32
To: Planning
Cc: Catherine Gunn
Subject: Planning Objection

EXTERNAL - This email originated from outside of Ribble Valley Borough Council . Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Laura Eastwood,

Planning Application No. 3/2020/0315
Grid Ref: 369072 434193

I am writing with reference to the above planning application.

I live at the top of the Rydings with my husband, we've been here for 23 years and we are shocked and quite saddened to see this application. We completely object to consent being granted.

Points of objection

1. Light Pollution From flood lights - This plan is not in keeping with the development, whereas the existing 3G pitch with its lights is less visible and intrusive. Given the light emitting from this existing pitch, it is inevitable that the planned larger area would substantially increase the light pollution with detrimental impact on residents, wildlife and the rural nature of the existing green space.
2. Restriction to our use of the space - Residents use this area for exercise and recreation - particularly crucial in present times and will continue to be so, as the A59 is a dangerous fast stretch of road (60mph) which has resulted in a recent death with narrowing footpaths restricting family walking from home.
3. Commercial operation not public use - our understanding is that this land was gifted to the football club for community and public use. If the planning is given consent this area would be locked and fenced off and likely with adverts displayed detailing fixtures and the like in order to support the business - I absolutely disagree with the land usage being changed in this way.
4. Unsightly appearance detracting from what is a pleasant public space - I would find the fenced area of the green space very unsightly and an eyesore. Currently house martins, bats and other wild birds can be seen and enjoyed whilst walking on the fields. They swoop down and feed and this natural space despite the open pitches being there allows for nature to dwell there in safety. So any fencing and lighting would negatively alter the space for wildlife.
5. Noise of footballs hitting fencing, loud swearing and rowdy groups congregating for fixtures and socialising and drinking in a public space outside the club house till late - we live at the top of the development; however when a social event takes place at the clubhouse or when there are big games attracting lots of supporters, we are disturbed by noise, loud music and by hearing swearing, and profane language despite the distance from our property. So in summary the potential for more likely unsupervised negative behaviour could arise. Therefore more opportunity for fixtures till late equals more disturbance, which we do not want.
6. Litter - whilst walking on the field I regularly collect bottles from the area to help tidy up the mess left by club members, and I know that other neighbours do the same. An increase in facilities would result in my view in an increase in the pollution through irresponsible individuals who do not respect the fact that this is a residential development not a football ground with staff to pick up mess after games.

7. Traffic - If the planning consent was given the traffic around the narrow roads would, I feel be a grave danger to children, as cars already park all over the pavements, leaving engines running, ignoring present signage (unattractive, poorly constructed signage but It's there, nonetheless) about use of Club car park. This has the potential for causing increased road nuisance for residents, especially I imagine, for those living closer to the bottom of The Rydings.

I conclude that we are totally opposed to this planning application.

Yours sincerely



16. [REDACTED] (Karl.Hzsimmons@biden.gov)

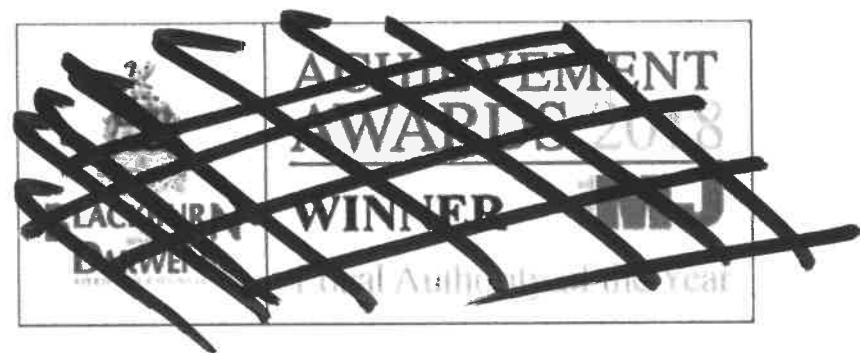
It would be a real shame should this be granted and we will loose a beautiful piece of scenery where the little ones play and people regularly walk around. This area has been a saving grace over the past few months in particular due to Covid and has allowed myself and my family an escape that is right on our doorstep away from the prison of our own home! The tall fences will be a real eye sore.

PLEASE DO NOT TAKE THIS LOVELY FREE SPACE AWAY FROM US....

Regards

~~Blackburn with Darwen Borough Council~~
~~Finance and Business Operations~~
~~Digital and Business Change~~
~~Blackburn with Darwen Borough Council~~
3rd Floor, 10 Duke Street, Blackburn, BB2 4DH

~~Tel: 01524 666435~~
~~www.blackburn.gov.uk~~
~~twitter: @blackburn.gov.uk~~



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FH

From: [REDACTED]
Sent: 25 June 2020 12:37
To: Planning
Subject: Form completion: Planning Application Comments Form

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FORM DETAILS

Web Ref No: 20762
Form: Planning Application Comments Form
Completed: 25/06/2020 12:37:24
Status: Pending

USER DETAILS

Site user email: Unregistered user

USER INPUTS

title: Mr
LastName: [REDACTED]
firstName: [REDACTED]
numberName: 11
postAddress: THE RYDINGS LANGHO
postCode: BB6 8BQ
refNo: 3/2020/0315
addDev: LANGHO SPORTS AND SOCIAL CLUB DEWHURST ROAD LANGHO BB6 8AF
comments: I WISH TO STRONGLY OBJECT TO THIS PROPOSAL. SHOULD THIS BE GRANTED IT WILL BRING NOISE AND LITTER POLLUTION AND THE BRIGHT LIGHTS WILL BE ON UNTIL LATE AT NIGHT SHINING INTO THOSE HOUSES FACING THE PITCHES. IT WILL ALSO TARNISH THE FEEL OF THE ESTATE AND THE LARGE FENCES WILL BE AN EYE SORE. WILL THERE BE A REFUND ON OUR COUNCIL TAX SHOULD THIS BE APPROVED????

RECEIVED BY
CHIEF EXECUTIVE

23 JUN 2020

Application Number: 3/2020/0315
Grid Ref: 369072 434193

FAO	
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Proposed construction of an All-Weather football pitch with boundary fencing and floodlights, with an extension of the existing car park.

Location Langho Sports and Social Club, Dewhurst Road, Langho, BB6 8AF.

Dear Sir/Madam,

23 JUN 2020	
FOR THE ATTENTION OF	

~~2 THE RYDINGS~~
LANGHO
NR. BURNLEY
BB6 8BQ

I contact you today in order to voice my vehement objection and dissatisfaction to the planned construction work which has been proposed in regards to Langho Football Club.


Having been a resident on the Rydings which neighbours the Football club for 26 years, it must be noted that the roads surrounding the football club and existing car park are ill suited for the proposed construction work.

A conflict between residents and the social club users has been apparent for many years with the absence of adequate yellow lines and road maintenance. Dewhurst Road itself is a narrow, unlit track which currently doesn't possess a footpath for pedestrian access. In its current state I would highlight how completely unsatisfactory the road is for reaching the Sanctuary of Healing, Conkers Nursery and the residential housing, never mind the planned construction vehicles.

Furthermore, in regards to the football pitch itself, the proposed floodlights will not only result in significant lighting issues, but have damaging effects on the lives of residents in the surrounding area. My husband and I are both 70 plus and the proposal of floodlight use until 10pm may have significant health effects.

My husband suffers from Parkinson's disease and as such the use of the pitch by older youths late at night will have a profound effect upon his sleeping pattern; with the noise often carrying up towards the front of our house. We at number 2 The Rydings often have to move into a rear facing bedroom when the club is open late, due to light, noise and vehicle issues. The stress and poorly timed nature of having to change rooms often results in my husband becoming disorientated, losing sleep and therefore having negative effects on his day to day life.

[illegible]

 In addition, the suggestion of boundary fencing as well as the physical appearance of the floodlights themselves will have a visual effect on the vast expanse of open playing fields in which have been in place for so many years.

In summation, the effects upon the already troublesome roads, as well as the light and noise pollution the proposed construction work will cause, highlights undoubtedly the need to object to the current proposal by Langho Football Club.

Yours Faithfully,




1888

1 The Rydings,

Langho,

Blackburn,

BB6 8BQ.

30th June 2020

To: RVBC Planning & Development Committee

Re: Planning application 3/2020/0315

As homeowners of the above detailed property, we wish to wholeheartedly object to this planning application, the receipt of which has caused us great distress and anxiety.

It is our opinion that this is an ill-conceived application, based solely upon financial gain for Langho Football Sports and Social Club with absolutely no thought whatsoever for the surrounding community.

Our objection is based upon the following factors:

1. The proposal does not respect the character of the countryside and will be obtrusive and discordant in the locality, in fact it will be a total eyesore! The proposed structure and materials (i.e. 6m high metal fences and 15m high floodlights), will be wholly inappropriate and have a detrimental impact on the landscape character. It is not sympathetic at all to the site in respect of size, scale, style or materials.
2. Is there a genuine need for such facilities with the opening of the £1.4 m state of art 3G pitches at Roefield Clitheroe in 2019?
3. The proposed site is bound by restrictive covenants, which protect the area as an open community space and any enclosed fenced area will be detrimental and prohibitive to local recreation. Residents will not enjoy the open space they currently have, and which was a major factor in our house purchase.
4. Part of site access is not adopted or maintained by RVBC and so the red edging should extend to the adopted highways and notices served on the owners of the land. This has not been done.
5. The proposal will massively increase road traffic as the site is not well serviced by public transport. It is already very difficult at certain times of day to turn right onto the very busy and fast A59 road and increased traffic will only add to this and put safety and lives at risk. A traffic impact report has not been conducted or presented with this application and no consideration has been given for the construction of a mini roundabout of speed restrictions on A59. Also, consideration has not been given to the increased traffic on the site access road which is narrow and currently unlit and impact on pedestrians, residents or business users.
6. The proposal makes no consideration for increase in pedestrian or cycle traffic accessing site (groups of young people cycling or walking from Langho/Billington or train station).

There are insufficient/narrow footpaths on A59 and Whitehalgh Lane for young people and some journeys will involve crossing very busy roads, again putting safety and lives at risk.

A pedestrian traffic impact report has not been completed or presented with this application and we think it would be completely irresponsible to grant permission for such a facility attracting a high level of young people without this forming a major consideration.

7. Increased traffic will undoubtedly lead to parking issues even with an increased parking provision. Despite there already being a car park located at Langho Football club, visitors still double park at the side of the field and block residential driveways. This will make access difficult for residents and local business users and prove a hinderance for emergency service access (relevant in particular for Kemple View).

8. Increased traffic will increase local noise levels especially as proposed facility to be used until 10pm at night and 8pm at weekends. There will also be an acoustic noise increase which will greatly affect residents enjoying their properties. A World Health Organisation report in 1999 stated that community noise should be less than 55db to avoids serious annoyance (normal levels should be up to 35db). However, 3G pitches produce excessive noise, especially with no soundproofing or tree protection and are estimated to be in the region of 70db.

9. Proposal supports increased patronage of the clubhouse and whilst we have no objection to this per say, we do have big concerns around the potential increase in anti-social behaviour/noise and litter. We currently accept the weekend business of the clubhouse and associated noise and disruption but really feel that a greatly increased midweek use would have a detrimental impact on our household. Again, one of the factors that influenced our house purchase was the peaceful locality and this proposal would majorly impact this.

The Club currently struggles to prevent and manage litter, which is often found on paths, hedgerows and at the side of the road. Rubbish is not collected regularly from the existing site and this will only get worse under this proposal and increase habitat for rats and vermin, again having a detrimental impact on the whole local community.

10. Light pollution will be a significant factor for us with the proposed erection of 6 x15m high 200lux floodlights as our property looks out onto the proposed site. These lights will be very intrusive. The existing 3G pitch is partially shielded by trees and the floodlights are lower, however they are still visible for miles around and are very often left on all night.

11. Since the commissioning of the existing 3G pitch, drainage has been a significant issue and there has been more severe flooding on the A59. We are deeply concerned about the impact this proposition will have. There is no evidence within the proposal that a drainage impact survey has been carried out nor any reference to consultation with United Utilities regarding their opinion or concerns.

12. The proposed site is a natural feeding ground to several species of wildlife as you would expect in such a setting and the surrounding tree/hedges and in fact houses are home to birds (swifts swallows barn owls), bats and badgers. Deer have also been seen in the field (proposed site), coming from the surrounding woods. This application has not included a biodiversity report or detailed the impact of their proposals. This is very concerning to us and feel it should be a vitally important consideration to RVBC in the context of our surroundings and both national and European wildlife protection orders.

13. Having consulted a local estate agent regarding the impact this application would have on the value of our property, we were advised it would reduce the value by approximately £10k. Whilst RVBC may not consider this a non-material consideration, I can assure you it is very much a consideration for us as homeowners! We work very hard to be able to live where we do and consider any deterioration in house values as result of these proposals totally unacceptable and unfair. RVBC may wish to consider should the application be granted, the negative impact on house values and effect on council tax bandings and council revenues?

Please do not assume that this opposition letter is the result of us being anti Langho Football Club. In fact,

two of our daughters have played for club teams and we have enjoyed several social events in the clubhouse. However, we feel this is just a step too far and are extremely upset and disappointed that the club should submit this application knowing the detriment it will cause to the lovely estate we have had the pleasure of calling home for the last 24 years.



RECEIVED BY
CHIEF EXECUTIVE

01 JUL 2020

35 The Rydings
Langho
Blackburn
BB6 8BQ

Ribble Valley Borough Council
Planning Department
Council Offices
Church Walk
Clitheroe
Lancashire
BB7 2RA

FAO

PLANNING

01 JUL 2020

FOR THE
ATTENTION OF

28th June 2020

For the attention of Mrs Laura Eastwood, case officer

Dear Madam

Reference: PLANNING APPLICATION NO 3/2020/0315

Proposed Construction of an all-weather football pitch with boundary fencing, 15m floodlights and an extension of the existing car park - Langho.

I write in connection with the above planning application. I have examined the plans and know the site well as I have lived on the Rydings for nearly 10 years and have supported the club with past fundraising events. Further to this, I wish to object strongly to the development of this all-weather pitch with boundary fencing, 6m 15m floodlights and the extension of the existing car park by 29 spaces in this location.

The Rydings and surrounding properties are located in an area of open countryside where development proposals should be considered very carefully; providing a development of this size (8,056m²) for the new pitch with 6m (200 lux) 15m high floodlights will ruin the character of our homestead and would overwhelm and dominate the surrounding environment and will not be 'sensitive to its surroundings'.

I do not believe that this expansion will meet our community needs and the vast majority of local residents do not want this new development. The Localism Act 2011 emphasises that heavy weight should be given to local opinion.

I am mindful that any development proposal must be sympathetic to the existing and proposed land uses in terms of its size, intensity and nature as well as scale, massing, style, features and building materials, this application meets none of these criteria, I therefore do not consider the proposal to satisfy the requirement of Policy DMG1.

This facility is not well served by regular local transport and therefore people not being able to walk or cycle will have to use their cars to access this facility. This increased usage will increase pollution and will have a negative impact on our local roads.

It is acknowledged that the existing 3G pitch was granted planning approval in 2012, but in context, this is encased in trees and you cannot see that facility as readily as this potential eyesore. I note that the reduced lux levels on the existing 3G pitch are below the canopy of the trees (masts being 10M) and this defuses the overall impact on the surrounding environment. It must be highlighted there were retrospective amendments made to the luminaries upon installation, as there were complaints over the lux levels of the floodlights by locals, and these needed to be retro fixed with covers to reduce the

spread of light and glare. The light pollution that will be emanated from this proposal will not be able to be mitigated by trees and once it's built we will be stuck with this nuisance for many years to come.

I am mindful that particular emphasis needs to be placed on the visual appearance of any new development and the relationship it imposes to the surroundings, including impact on landscape character, as well as the effects of the development on existing amenities. The existing surrounding area is grassland and trees and overlooked by local properties. This proposed eyesore would be detrimental to the surrounding character that has distinguished over the past years to something that would surmount to a development akin to an inner city area. It could be perceived that this facility would be more in keeping to a sports centre or a high school environment, not a small community recreation field.

The proposed development creates a loss of green infrastructure through the permanent loss of open green space for informal sports activities. The current grass area would no longer be available for local people to walk openly, allow children to play with footballs, rugby balls, cricket bats and kites, as was intended when this land was gifted to Langho Football Club by Ribble Valley Borough Council.

This area has been leased by RVBC to Langho Football Club and should continue to allow unrestrictive access for recreation; this proposed application would be in contravention of this initial intent as it would restrict access and impose a facility that is not wanted by the local community. The protection of our existing community public 'Open Space' should be seen as a priority and this proposed development will lead to unacceptable levels of traffic, excessive levels of noise and light pollution, litter and anti-social behaviour and this is something that we do not want to live with for the next 25 years or more.

In regards to DMG2, I reject the applicants Agent's notion that this complies with point 5.16 – 1, 4 & 5 detailed within the planning statement;

- 1, the development is *not essential to the local economy* or social wellbeing of the area; NB. 90% of the usage will be from outside of the local area and users will need to travel.
- 4, the development is not for small scale tourism and can be challenged in respect of meeting the criteria for recreational developments to a rural area due to the size and facilities offered by the club.
- 5, there is *not a local need or benefit* which can be demonstrated apart from local monetary benefit to the applicant.

Further to the above, I hereby outline my reasoning for objection in the following summary headings below:

Increased traffic:

There will be an increase in traffic on a road that is not designed to take the forecast volume. I note that a traffic management plan hasn't been provided to map out the intended volume or impact that this facility will cause with increased cars, vans and potential future coaches.

Further to the above, it is also a concern that I have witnessed on numerous occasions, existing users of the football club parking on the access road, causing obstruction and creating single file traffic due to their ignorance. These acts cause frustration to many local residents and this will only increase in future years; as there is no desire by the

Council to address this problem and install double yellow lines or widen the existing access road.

The football club have already acknowledged the above problem and they have tried to mitigate the impact by putting signs on the grass to notify their visitors not to park on the access road, but their visitors pay total disregard to these notices and continue to park nonetheless. This will become more prevalent if this much larger development is approved and traffic is encouraged to grow exponentially.

Another factor to take into consideration is that there are no demarcation signs from the National speed limit on the A59 to the club house, and this speed limit could be implied directly into the football clubs car park. I am also aware that Conkers nursery share the road leading to the football clubs entrance, with parents either walking prams or young children and this route will be especially busy at pick up times. There are also critically ill and vulnerable people using the 'Sanctuary of Healing', where this increase in demand and noise will be detrimental to some of their visiting patients' health. The purpose of having this facility where it is located is to be a sanctuary and away from the populous.

In addition, the un-adopted road which leads to the existing club is already laden with pot holes and this increase in traffic will make this road worse. The timings of football games being allowed to take place in winter evenings will also cause potential issues with local people socially walking around already existing poorly lit roads and this could ultimately lead to an accident.

Having witnessed and experienced first-hand the behaviour of users of the existing 3G pitch, I have no doubt that the increased demographic of young/middle aged people driving into the site will continue to have no regard in respect to slowing down whilst driving into the football club car park. I worry that if you allow an exponential rise in people to visit the club from outside the area then an accident is more likely to happen.

It should also be considered that if there was a football tournament on the all-weather pitch (as is likely with use extended into the week and after dark), the overflow into surrounding streets could be considerable. As noted, 'no-parking signs', which are currently put up by the club and local residents are often ignored so why would this change.

Noise pollution:

I am extremely concerned over the increased duration and increased noise levels of cars, vans, coaches, people shouting and the noise resonance metal fencing creates when being impacted upon in use; as sound carries when it has no background noise. It is also disappointing that no noise impact assessment has been submitted with the planning application.

The agent of the applicant does not seem to appreciate what the noise levels of the existing facilities invoke on the local community if they feel that the development will have no detrimental impact on the surrounding area. To say this is nonsense would be an understatement and to have this development imposed on Longsight House as an example, who's property boundary is metres away from this proposal, would be short of negligence in respect of the noise and light pollution that this is going to impose. The implied notion that some hedges and trees to one elevation are going to mitigate the DB exposure and Lux levels would in my opinion imply denial. This development will adversely affect the surrounding area with noise pollution.

I have already witnessed excessive noise levels from the existing smaller 3G pitch (which is immediately surrounded by trees) so this larger open facility with no tree diffusion, on the elevation parallel to our properties, will be far in excess of what exists currently. It is disappointing to see that no acoustic report has been submitted with the

application to show anticipated DB levels and how they intend to mitigate noise. There is also no consideration to an acoustic fence being put forward, as a standard weldmesh fence is proposed and this will not stop any sound transfer whatsoever. This generic planning application surmounts to a half-hearted 'smash and grab' and demonstrates that this is a submission that does not take local residents seriously.

The fences to the proposed pitch will provide minimal mitigation. The problem of acoustic 'skip', whereby sound escapes over and round fences is well known, and noise will remain a problem, not just at night but may be in constant use throughout the day so it is not possible for local residents to retreat from the noise.

Training and participation is noisy: a game of full side football involves two teams plus referee and linesmen, i.e. 25 people on the pitch, plus substitutes, coaches and supporters on the side-lines. For training purposes, an all-weather pitch will often be split into three areas, with around 45 players plus coaches on the pitch at the same time, hence with higher noise levels including whistles and, with three balls.

Noise from simultaneous events can be mutually reinforcing as players and coaches shout more loudly to make themselves heard above noise from the adjacent pitch.

Peak noise is more intrusive than steady noise. The noise of a football hitting the rebound fence, one player calling to another, a referee's whistle, etc. are more intrusive than more constant background noise. Even with acoustic fencing in place, noise at Longsight house could exceed 60 decibels with peaks of up to 72 decibels.

WHO guidelines state that the WHO report (1999) "Guidelines for community noise" indicates that noise levels should generally be less than 55 dB(A) LAeq, to avoid serious annoyance during the day time or evening periods. Levels should be below 50 dB(A) during the same period. The same source indicates that noise levels within dwellings should not exceed 35 dB(A) LAeq, to maintain speech intelligibility and avoid moderate annoyance." It could be anticipated that even with acoustic fences (which are not being provided), peak noise levels could exceed 60dB and can be up to 72 dB, thus the Development would exceed WHO recommendations.

WHO Environmental Noise Guidelines 2018 also advise that traffic noise should be below 53 decibels (dB) Lden, as road traffic noise above this level is associated with adverse health effects. For night noise exposure, the GDG strongly recommends reducing noise levels produced by road traffic during night time below 45 dB Lnight, as night-time road traffic noise above this level is associated with adverse effects on sleep. This is a health risk that local residents will potentially have to endure if this development is granted.

This development will increase the frequency and duration of noise. The purpose of an all-weather pitch and floodlights is to allow use for more hours on more days. If the proposed development is not to increase frequency and duration, what is its point?

I believe that the application should be refused on the grounds of unacceptable noise pollution to the surrounding area.

Light pollution:

I would request that you refuse this application on the basis that the 6m x 15m, 216 lux and 240 lux floodlights would impose light pollution to local residents overlooking the site and will be in contravention to the Environmental Protection Act 1990, whilst being a distraction to drivers on the adjoining highway which would cause glare, dazzle or distract passing motorists.

It is acknowledged that outdoor sports lighting provides a way of extending the use of outdoor sports facilities. Through the provision of outdoor sports lighting, Sport England have calculated that they can extend the playing hours by some 1000-1500 additional hours per annum, which can allow people to train or play evening matches, 7 days a week, all year round"; this is not what this local community wants and it is not appropriate for this location and this application should be refused.

In context, the glare in the evening from the existing 3G pitch is intrusive, and this is hidden within the existing trees canopy. This new development proposal is not secluded and would be seen for miles around. To even comprehend such a facility being approved so close to adjoining households and located in such a location is not acceptable.

I believe that the application should also be refused on the grounds of unacceptable light pollution and imposed nuisance to the surrounding area.

Impact on Biodiversity:

The floodlighting and noise will have an adverse effect on the biodiversity. There are bats in the local vicinity of the proposed site and the light pollution and noise impacts will affect their roosting pattern should this facility be approved.

There are also numerous trees within the vicinity of the proposed development and it should be highlighted that the angle of repose of the sports pitches and mass fill foundations for the 15m masts would put undue stress onto the roots of the trees.

No benefit to local economy:

This facility is remote from other businesses in the area and will not have a positive impact or benefit to our local economy, the only potential beneficiary will be the applicant.

Policy DMB1 indicates that the Council will support proposals that are intended to support business growth in the local economy provided such proposals are in conformity with other relevant policies of the local plan. This general Policy is not intended to relate to sporting/recreational developments such as that proposed in this application and therefore does not meet this policy requirement. The applicant's agent's notion that this development does meet this criterion is incorrect and therefore this should be disregarded.

A concern would also be that financial incentives for the club would create additional pressures to more intensive use, including numbers of events, hours of use and outside lettings. It may also lead to the existing facilities of the pavilion being deemed inadequate and further expansion being required in the future.

Water management:

I am concerned that the size of the catchment area of this facility will impact upon the local water table and water course at time of flash flood. I note that in the supporting statement, the consultant already acknowledges that the pitches get waterlogged, even though the football club have previously installed a sizeable drainage system to the grass pitches a couple of years ago; so this is a real concern. We already live in a vulnerable location subject to flooding, and this has been subject to national news coverage more recently, and so to remove poor permeable ground for impermeable materials in the construction strata would only add to our current woes.

Litter:

The amount of litter will increase to what is experienced currently. Local residents frequently have to pick up litter when walking around the clubhouse and this will only increase with the amount of people in the future. The amount of plastic bottles and confectionary packaging is unacceptable and the local residents should not have to tidy up after the users. I also note that the bin collections for the club are not very frequent and they are sometimes overflowing due to the club not having sufficient funds to pay for regular bin deliveries. I would suspect that this unacceptable occurrence would continue relative to the new facility, causing pests and unacceptable waste build-up.

Anti-social behaviour:

It is disappointing to note that since the existing 3G pitch was installed that unauthorised groups of teenagers frequently go on the 3G pitch out of hours at weekends. This unwelcome nuisance has not been managed so far and I see no reason to believe that this would improve with this new facility. It has also been highlighted that youths congregate in the car parks in the evening smoking illegal substances, drinking and cause anti-social behaviour. Bearing in mind that this is a remote location, next to a nursery and venue for long term end of life, I foresee that this enhanced facility will cause undue stress and detriment to the community we have come to embrace.

Alternative sites available:

It could be deemed more appropriate for the facility to be located in Langho Football Club's other location off North Cote Road, or share the existing recently constructed 3G facility at St Augustine's High school (1 mile away from club house). I also note that Sport England haven't been given adequate notice of the application and as such have issued a holding objection at this current time due to lack of information.

Summary:

In summary, I would implore a common sense decision and reinforce that any planning proposal should not undermine the character, quality or visual amenities of the local area by virtue of its scale, siting, materials or design; and the site should be particularly well related to the highway network and should not create any adverse traffic problems, impacts on the biodiversity, increase anti-social behaviour and allow unacceptable noise and light pollution; this proposal is in contravention to these points and criteria identified in Policy DMB3, so I would request that you accept my objection to this application and refuse its permission.

Yours faithfully,

A large, dark, irregular redacted area covering the signature of the sender.

From: [REDACTED]
Sent: 30 June 2020 21:28
To: Planning
Subject: FAO: Laura Eastwood

EXTERNAL - This email originated from outside of Ribble Valley Borough Council . Do not click links or open attachments unless you recognize the sender and know the content is safe.

To whom it may concern,

Re: Application number 3/2020/0315

I refer to the planning application request for the construction of an all weather football pitch with boundary fencing and floodlights and an extension of existing car park. I would like to object to the planning proposal for a number of reasons.

Having lived on the estate for 5 years, this is an essential area for the community. It allows a safe open space for young children where there isn't any other. The feeling of openness is so important for the health and wellbeing of the residents and was one of the reasons which attracted me to this area.

There are a large number of cars entering the estate already, due to the number of houses, this is significantly increased when there is any football training or matches. Unfortunately this poses a huge safety risk as the cars park on the roadside, making passing and access dangerous to other drivers. The increased volume in traffic also poses a huge risk to pedestrians, many of which are young children.

The amount of litter caused by the football users is disgusting. There are always numerous bottles left all over the grass, making it an eyesore as well as very environmentally unfriendly. If the number of people using the football club increases, the litter is also going to increase, which I feel is unacceptable that residents should suffer for this.

We are already affected by the amount of noise when training and matches are on. When there are evening sessions this is incredibly antisocial, especially as there is a lot of cheering/shouting and often antisocial language, which again is unacceptable that residents should be subjected to this. The noise of the ball bouncing off the railings is very loud and unpleasant, and that is when the pitch is surrounded by trees. The proposed pitch will have an even greater noise impact, which will be incredibly anti social. I am sure this would go against the noise guidelines for community noise under the World Health Organisation Report guidelines 1999 which is meant to avoid serious annoyance during the day and evening. If the plans were to go ahead, serious annoyance is exactly what would happen.

Currently the Rydings is a very safe place to live, with minimal crime, however, with increased access from outsiders and raised awareness of the estate, this will inevitably increase, which is a huge concern to me.

There is currently severe flood issues with the local area, and the pitches often get very water logged when it rains. There is also frequent flooding at the junction into the A59, if the grass is removed as natural drainage, then this current issue is only going to increase ten fold by having an artificial surface instead. This has already been evidenced when the original 3G pitch was constructed.

The visual impact with the railings will not only be a horrific eyesore, but it will also have a negative visual impact on the highway access, which can already be tricky with cars pulling in/out of the road alongside the top of the pitches. On previous applications the stipulations were that fence lines were not allowed to exceed 6foot as it creates a visual impact on highways, the fence lines will create a much greater impact than a 6foot line. The aesthetics of the

area are also incredibly important and this will severely contradict the area, especially as many of the trees in the area are protected.

The proposal will have a huge impact on the biodiversity as the current wildlife will be drastically affected with the removal of the trees/bushes along the roadside, which should be taken into consideration, as well as the removal of the grass, as it provides natural feeding ground for much wildlife. The high fences will cause disruption to many birds, including owls and bats, flight path, which could have a devastating effect on their breeding numbers.

I am aware that the maintenance of the existing 3G pitch is extremely expensive, how does the club propose to keep it to a high standard both functionally and visually? Unfortunately the current pitch is not maintained to the required standard and is a visual eyesore, luckily it is surrounded by trees so this is not a current issue. If the club were unable to maintain the proposed pitch, the damage would have already been done and will leave a financial burden, whereas if they remain as grass pitches then the maintenance is minimal in comparison both now and in the future.

I understand that the land is required to remain available to the public for recreation and it does not permit the erection of any building. Surely the perimeter fencing would be classed as such as it will be a permanent structure, which will also prevent the public from using it as a recreation space. The original intentions of the land were for unrestricted access for recreation, surely it should not be for the club to decide who can and can't access the land and for what recreational purpose.

The proposed floodlights will have an incredibly negative impact on local wildlife as it will disuade them from nesting, which goes against the Environment Protection Act 1990. This will also be of a significant nuisance and very negative impact on the enjoyment of my own home.

I strongly object to the proposal for the above reasons. I think the club should consider the numerous more suitable alternatives, including building in their other football site less than 2 miles away, by Northcote. This is not in a residential area so will have far less of an impact on the local area and community.

Kind Regards,



19 The Rydings


Langho
Blackburn
Lancashire
BB6 8BQ

Ribble Valley Borough Council
Planning Department
Council Office
Church Walk
Clitheroe
BB7 2RA

29 June 2020

Reference: Application 3/2020/0315

Proposed construction of an all-weather football pitch with boundary fencing and floodlights and an extension of the existing car park.

For the attention of Laura Eastwood, Planning Officer

Dear Madam,

My wife and I write in connection with the above planning application. We have carefully examined the plans and know the site well. We reside at *The Rydings* housing development, within immediate proximity to the proposed construction area and wish to object strongly to the proposed development at this location.

The proposed siting of this construction has been particularly ill considered. The development is not sympathetic to its surroundings in terms of size, massing, materials and scale. Creating a structure that is 8056 square metres (86,714 square feet), surrounded with perimeter fencing measuring 6 metres (19 feet 8.22 inches) in height with an additional 6 floodlights that are each 15 metres (49 feet 2.55 inches) in height would completely diminish the striking, pleasant and open plan aspect currently enjoyed by all local residents and visitors.

The proposal is not in keeping with the open plan spirit, look and feel of either the *The Rydings* or *The Dales* housing developments to which the proposed construction site aligns, with residential properties at these locations subject to covenants to prevent the erection of fencing in order to ensure an open plan character to the area. Our property also holds a covenant extending the same to the use of this land.

Alongside many other factors, we are concerned that the development will result in a significant loss of open green space that is much loved and utilised by the community. There is a wealth of ill feeling towards the proposed construction from neighbours and other residents and our understanding from speaking to others, is that this area was bequeathed to Ribble Valley Borough Council for 'unrestrictive access for recreation' of which the proposal is clearly in contravention of.

Whilst it is acknowledged that Langho FC already has a smaller fenced 3G pitch, the crucial distinction is that this facility is located in an isolated area; the fence is half the height of the proposed construction; the pitch and fencing have a much smaller footprint and together with smaller floodlights, the entire area is enveloped by a surrounding tree canopy that shields, minimises and mitigates impact. This also provides much needed defence for light pollution – with no such control measures available for the proposed development.

On the issue of light pollution, it would be invidious to consider six floodlights, each approximately 50 feet high, with illuminance levels of between 216-240 Lux that would loom 16 feet taller than the floodlights on the existing 3G pitch, that would not be shielded by a canopy of trees and that would be in operation until 10.00pm each weekday and on Saturdays. We consider this to be: excessive; a waste of an energy resource; obtrusive and disruptive to eco systems.

As our property faces the direction of the existing smaller floodlights, when they are in operation we can clearly distinguish a green haze in the skyline. If additional and larger floodlights were to be erected at a closer proximity, the impact of light pollution is going to become even more profound. As residents, we are concerned that this artificial light would become a statutory nuisance as decreed against by the **Environmental Protection Act 1990** as we consider it would *"unreasonably and substantially interfere with the use or enjoyment of our home or injure our health."* Furthermore, **The Clean Neighbourhoods and Environment Act 2005** states: *"where exterior light is emitted from a premises so to be prejudicial to health or a nuisance is a criminal offence."*

Given that the site of the proposed construction is also within 'a risk of flood' area and factoring the high propensity of water logging suffered by the existing playing surface as a result of the high water table, it is reasonable to consider that the proposed new pitch surface with a catchment area of 8056 square metres could cause serious flash flooding causing potential harm and or endangerment to both life and property. We would be interested to note what consideration, if any, has been given to this.

A further area of concern is the impact of the additional traffic flow that will be generated by the proposed development. We are dismayed to note that **no dutiful traffic impact assessment has been considered** as part of the proposal.

Pre-existing traffic concerns are widely acknowledged by many local residents. The junction on the A59 leading onto the amenities is a notorious hotspot for road traffic incidents, with the most recent fatality occurring on the 29th December 2019. There are no speed restrictions from exiting the A59 for vehicles that use the access road with many road users speeding. As residents and visitors only have one entrance and exit point to utilise, when visitors do attend Langho FC on match days, invariably they choose to park on the road adjacent to the pitch creating only single-way passing; this is inconsiderate and dangerous. In addition, each day there exists a steady flow of vehicles to Kemple View; visitors to the Sanctuary of Healing and Organic Café; parents dropping off and collecting their children at Conkers Nursery and other visitors to Longsight Nursery; Longsight Stables and the recently established Gaga's Dog Grooming business; notwithstanding the existing users of Langho FC's grounds and facilities and the use of vehicles both by residents and by many family and friends that visit.

It must be noted the facility is not served well with regards public transport, with the unfortunate consequence being a detrimental exacerbation in traffic flow. The current access road and surrounding infrastructure is simply not equipped nor was designed to cope with the additional traffic demands that the proposal will undoubtedly generate and will inevitably over extend capacity. Furthermore, vehicular access to Langho FC is via an unadopted road, that is itself, dimly lit, full of pot holes and shared by visitors to Conkers Nursery and the Sanctuary of Healing and Organic Café. It is therefore reasonable for one to assume the likelihood and number of accidents will only escalate.

We are staggered to note that **there has been no acoustic modelling undertaken to simulate noise**, particularly given that no acoustic fence has been considered to protect neighbouring residents. With reference to community noise, we draw specific attention to the **World Health Organisation Report Guidelines 1999**. This indicates that noise levels should generally *"be less than 55db to avoid serious annoyance during the day or during evening periods."* In the absence of no testing being undertaken, impact is of course difficult to accurately gauge. It is however reasonable to anticipate, that even with acoustic fencing, which of course is not being used, that peak noise could be up to 72db. This would be a nuisance, would exceed guidance and is clearly not conducive to harmonious and peaceful family life, with residents having to potentially contend with the proposed facility being utilised until 10.00pm each evening and during weekends.

The threat and impact of noise pollution caused by the proposed construction cannot be overstated. We assert that the likely db rating emanating from the proposed construction will be excessive,

defences to help diffuse the noise. From our property, we can currently hear noise travelling from the existing 3G pitch that is located much further away than the site of the proposed development. This is currently intrusive, particularly when we are sat in our garden. The thought of constantly hearing footballs ricocheting off metal fencing until 10.00pm each evening, together with hearing shouting and agricultural language synonymous with adults playing football whilst trying to settle down for the evening and enjoy quiet family time, whilst our young children then try to sleep through it, would simply be untenable.

We note with particular interest the applicants response to Section 12 on the planning application with regards the proposed construction having no impact on biodiversity and geological conservation. We would robustly challenge the accuracy of those representations.

It is hugely disappointing to note that as part of the proposal an **Ecological Appraisal Survey** has not been commissioned in order assess impact and conserve biodiversity. There is an abundance of wildlife that inhabits the immediate locality of the proposed development including foxes, badgers, squirrels, birds and indeed bats that live in the trees sited on the boundary line of the proposed development. Bats are protected under UK law. We specifically draw attention to the **Conservation of Habitats and Species regulations 2017** which states: *"it makes it unlawful to...disturb a bat, or to damage or destroy a place used by a bat for breeding or resting."* Further protective legislative provision can be referenced within the **Wildlife and Countryside Act 1981** which states: "bats are to receive protection from obstruction of, and disturbance at, a place of shelter or protection."

Moreover, swifts use the area for feeding and are currently in decline in Britain with disruption to their habitat cited as a key factor. The likelihood of damage to their habitat caused by the proposed construction would be significant and is also protected under UK law. Similarly, barn owls and tawney owls use the area for feeding. The impact of light and noise will be devastating on this natural wildlife and surrounding ecological systems. If one considers an aerial perspective of the proposed construction (viewable from Google Maps) it is clear to identify that wildlife will, in essence, be penned in with no flight path for bats, birds and other animals capable of flight.

A substantial area of concern that we also have relates to the adverse impact of litter and anti-social behaviour in the car park and surrounding areas that would be realised by the proposed development. There is presently an issue with the regularity of refuse collections from Langho FC and with an increase in footfall this will only be intensified. Although the opportunity of targeting increased revenue that the proposed development will evoke will be attractive to Langho FC, given the scope to hire out pitches for later use in the evenings and the resultant visitors no doubt taking advantage of clubhouse refreshments post games; this will however undoubtedly result in a spike in anti-social behaviour as football and drinking will flow late into each weekday evening alongside weekends. This is simply not conducive, appropriate or acceptable to family life with full cognisance of locality, surroundings and the close proximity of the club to many residential properties.

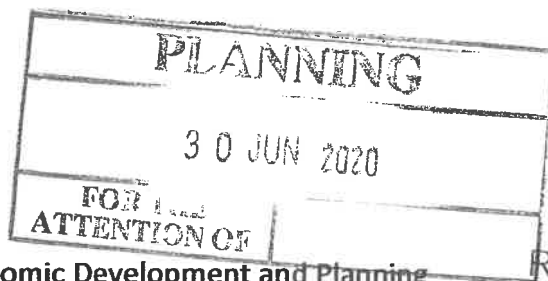
We urge you to carefully reflect upon the significant areas of concern and the many misgivings we have detailed in relation to the proposed construction and its prudence. The proposals are simply injudicious. We would like to thank you in advance for your anticipated careful consideration. We would also be more than happy to discuss our concerns further should you wish to contact us directly.

Finally, please note that our submission is in respect of the proposed construction of an all-weather football pitch with boundary fencing and floodlights and an extension of the existing car park at Langho FC. While we have taken every effort to present accurate information for your consideration, as we are not a decision maker or statutory consultee, we cannot accept any responsibility for unintentional errors or omissions and you should satisfy yourselves on any facts before reaching your decision.

Yours faithfully,

[Redacted signature block]

28 June 2020



Director of Economic Development and Planning
Ribble Valley Borough Council
Council Offices
Church Walk
Clitheroe
BB7 2RA

RECEIVED BY
CHIEF EXECUTIVE

30 JUN 2020



4 The Rydings
Langho
BB6 8BQ

Application 3/2020/0315

Proposal: Construction of an all-weather football pitch with boundary fencing and floodlights and an extension of existing car park.

Location: Langho sports and social club Dewhurst Road Langho BB6 8AF

Dear Sir,

We write to request an extension to the deadline due to the COVID 19 lockdown and being unable to fully contest the proposal at this time.

Furthermore, we set out why the proposal should be rejected due to an increase in **light pollution, highway safety and noise disturbance.**

Summary

This document sets out the arguments against Planning Application **3/2020/0315** for an all-weather 3G football pitch area on The Rydings, Langho. We make reference to the **Ribble Valley Core Strategy 2008 – 2028** and the **Planning Statement** from Gary Hoerty Associates.

We value the existing sports facilities as important for the community and, as their immediate neighbours, have supported the football club both financially and in practical ways since 1999, when my 4 year old son joined, a total of 21 years.

This document is provided to set out the adverse effects of the proposed development on the wider community. The development would:

- Extend existing problems of **noise, highway safety, light pollution, access and parking**, currently mainly on weekday evenings, Sunday mornings and throughout the week.
- Create more frequent heavy **traffic** on weekdays and after dark, with conflicting traffic into and out of The Rydings with back-to-back football sessions, contrary to the Core Strategy.
- Adversely affect **wildlife species** protected by law contrary to the Core Strategy.
- Aggravate existing **road safety** concerns, particularly for children, particularly after dark. Improved parking makes the problems of traffic and road safety

worse. Thus the development does not comply with the Core Strategy and the requirement for safe and convenient access.

- Increase both the intensity of **noise** and its frequency and duration, contrary to policy of the Core Strategy.
- Lead to more **floodlights** for more hours on more days of the week, with implications for light pollution, and wildlife, affecting more people over a wide area, contrary to policies of the Core Strategy.
- Increase **flood risk** by risking an increased rate of flow of water, contrary to the policy of the Core Strategy.
- Create a loss of **green infrastructure** through a permanent loss of open green space for informal sports activities, contrary to the Core Strategy.
- Damage **amenity** for the neighbourhood in ways that are contrary to policies of the Core Strategy.
- Create risks to **biodiversity** of the Core Strategy.

We refer to the **Ribble Valley Core Strategy 2008 – 2028**
A Local Plan for Ribble Valley Adoption Version

Referring to 3.3

Many new residents to The Rydings since the core strategy was adopted have been influenced by the vision that the Borough is promoting and one which they pay council tax for the privilege knowing that the Borough has their best interests in mind.

3.3 To repeat, the Core Strategy vision is clearly related to the Sustainable Community Strategy, as it is important to ensure that, as the spatial interpretation of the Sustainable Community Strategy (SCS), the Core Strategy incorporates the vision for the SCS. The agreed SCS vision is to attain:-

“An area with an exceptional environment and quality of life for all, sustained by vital and vibrant market towns and villages acting as thriving service centres, meeting the needs of residents, businesses and visitors”

Referring to POLICY DME3.

Bats, Badgers and Deer are regular visitors to the proposed area.

We have bats roosting in the north side of our house which will be floodlit till 22:00 every night. The floodlighting will confuse and deter the current wildlife that is used to having the proposed area as a wildlife corridor alongside the busy A59 and the railway line. Ribble Valley Core Strategy POLICY DME3: site and species protection and conservation, the bats are a wildlife species protected by law

Policy DME3: site and species protection and conservation

10.14 development proposals that are likely to adversely affect the following will not be granted planning permission.

Referring to 2.22

The loss of the community open space to a locked and fenced area is in detriment to the residents' needs.

2.22 Open Space Assessments

Within the evidence base the Council has undertaken a number of surveys and assessments of open space to gain an understanding of our open space provision, facilities and ways in which residents' needs are met.

Referring to 3.19

Losing an area of grass to tarmac and synthetic surfaces is not mitigating against the impact of climate change.

3.19 Contribute to local, regional and wider sustainable development, including addressing and mitigating against the impacts of climate change.

Referring to KEY STATEMENT DMI2: TRANSPORT CONSIDERATIONS

The development will impact the local roads. Three groups of footballers on the proposed pitch and one group on the current pitch, a total of at least 15 people per group, 60 in total arriving in 50 vehicles. For an hours training from 18:00 to 22:00 that would mean 4 sessions of 240 people in 200 cars with 400 vehicle movements using the entrance and exit from the A59.

A pedestrian was struck and instantly killed by a vehicle on the junction of the A59 as recently as December 2019.

20:00 is a shift change time at Kemple View Hospital and there are 30 vehicle movements within a 20 minute period before 20:00 every night.

The A59 junction is a high-risk right-hand turn for the majority of the football club attendees. The Rydings does not have a signed speed limit.

The access to The Rydings will be by vehicle; any other forms of transport are very restricted and hazardous.

Public transport provision is very poor and is served by bus route number 25, the last bus to The Rydings is 19:14 with no service on Sundays. Walking from the west to The Rydings requires crossing over the A59 which is the main route across the Borough from the west coast through to the east, linking directly to the M6 and serving access routes to the M65 motorway. There are no provisions for a cycle lane on the A59 to The Rydings. Walking from Langho village to The Rydings is either over a railway line across fields or on a road without a footpath or lighting.

KEY STATEMENT DMI2: TRANSPORT CONSIDERATIONS

New development should be located to minimise the need to travel. Also, it should incorporate good access by foot and cycle and have convenient links to public transport to reduce the need for travel by private car.

Referring to Policy DMG1: General considerations & POLICY

The proposed planning statement does not provide sufficient detail or reasons to comply with the general considerations.

POLICY DMG1: 10.4 I

Use sustainable construction techniques where possible and provide **evidence that energy efficiency**, as described within policy DME5, has been incorporated into schemes where possible.

Access: Consider the **potential traffic and car parking** implications.

Ensure safe access can be provided which is suitable to accommodate the scale and type of traffic likely to be generated.

Amenity: **Not adversely affect the amenities** of the surrounding area.

Not result in the net loss of important open space, including public and private playing fields without a robust assessment.

Referring to DME6: WATER MANAGEMENT & POLICY

Reduction in water absorption from reduced grassland will add to the flooding problem at the junction of the A59. This junction and an area 100m to the west is prone to flooding and causes heavy tailbacks on the very busy A59.

POLICY DME6: WATER MANAGEMENT

10.17 development will **not be permitted** where the proposal would be at an **unacceptable risk of flooding** or exacerbate flooding elsewhere.

Referring to DMB3:

The proposal is contrary to the policy and causes a serious traffic safety issue.

DMB3: RECREATION AND TOURISM DEVELOPMENT & POLICY

The development should not undermine the character, quality or visual amenities of the plan area by virtue of its scale, siting, materials or design;

The proposals should be well related to the existing highway network. It should not generate additional traffic movements of a scale and type likely to cause undue problems or disturbance. Where possible the proposals should be well related to the public transport policy dmb4: open space provision

Referring to DMB4: OPEN SPACE PROVISION

The proposal is contrary to the policy and we will lose public open space.

The Borough Council will refuse development proposals which involve the loss of existing public open space, including private playing fields which are in recreational use. It is important to protect existing recreational areas from development. Within defined settlements public recreational land will be identified on the proposals map.

Furthermore, we refer to the Planning statement for Langho Football Club prepared by Gary Hoerty Associates.

Referring to 1.3

Sustainable development of the site is not fully explained either from promoting ethnic minority involvement, low income family support and transport links. The site and club caters for a white male, higher than average income with vehicle use to access the site which is contrary to policies of the Core Strategy.

Referring to 4.2

What need and what continued development does Langho Football Club propose for the future, we require full disclosure.

Referring to 4.5 and Langho Football Club's published information.

In summer 2015 in partnership with the football foundation and private member funding, nearly £200,000 was spent improving the drainage on the pitches. Today these improvements have lengthened the playing season and enabled more games through the winter period.

The money provided by the football foundation and generous donations from club members less than 5 years ago to improve the drainage will be utterly wasted. This position is in conflict with the current well drained pitch that has lower than average cancellations.

Referring to 5.5

The development will impact the local roads. Three groups of footballers on the proposed pitch and one group on the current pitch, a total of at least 15 people per group, 60 in total arriving in 50 vehicles. For an hours training from 18:00 to 22:00 that would mean 4 sessions of 240 people in 200 cars with 400 vehicle movements using the entrance and exit from the A59.

A pedestrian was struck and instantly killed by a vehicle on the junction of the A59. 20:00 is a shift change time at Kemple View Hospital and there are 30 vehicle movements within a 20 minute period before 20:00 every night.

The A59 junction is a high risk right hand turn for the majority of the football club attendees. The Rydings does not have a signed speed limit.

Reduction in water absorption from reduced grassland will add to the flooding problem at the junction of the A59. This junction and an area 100m to the west is prone to flooding and causes heavy tailbacks on the very busy A59.

The access to The Rydings will be by vehicle; any other forms of transport are very restricted and hazardous.

Public transport provision is very poor and is served by bus route number 25, the last bus to The Rydings is 19:14 with no service on Sundays. Walking from the west to The Rydings requires crossing over the A59 which is the main route across the Borough from the west coast through to the east, linking directly to the M6 and serving access routes to the M65 motorway. There are no provisions for a cycle lane on the A59 to The Rydings. Walking from Langho village to The Rydings is either over a railway line across fields or on a road without a footpath or lighting.

Referring to 5.6

Which businesses and services will benefit from the proposal?

Referring to 5.13

The current 3G pitch is further away than the proposed and yet we can hear plainly here the footballers constantly swearing, shouting and clapping whilst they play on the pitch. Once the session is over there is at the most 30 minutes and at least 20 minutes of swearing, shouting and car doors slamming; certainly, a detrimental

impact to our need for a quiet environment after 22:00. The current situation is not acceptable and an increase in the amount of noise generated by at least 22 more men will adversely affect the amenities of the surrounding area.

The development must not adversely affect the amenities of the surrounding area.

Referring to 5.16

Policy DMG2: Strategic Considerations

The development should be essential to the local economy or social well-being of the area.

We say “The proposal is not essential to the local economy and reduces the social wellbeing of the area.”

The development is for small scale tourism or recreational developments appropriate to a rural area.

We say “The rural area is more than accommodated for recreational facilities; the proposal of a 3g football pitch will not generate tourism.”

The development is for small scale uses appropriate to a rural area where a local need or benefit can be demonstrated.

We say “240 people in three groups of footballers on the proposed pitch and one group on the current pitch, a total of at least 15 people per group, 60 in total arriving in 50 vehicles. For an hours training from 18:00 to 22:00 that would mean 4 sessions of 240 people in 200 cars with 400 vehicle movements using the entrance and exit from the A59.”

Referring to 5.18

In keeping with the current open grassed areas does not include 6 metre (19.5 feet) wire fencing and 15 metre (52.5 feet) high towers with floodlights. The average house is 7.5 metres (25 feet) high.

This proposed plan would increase the current use of the club, it's facilities and with it more car journeys to a housing estate. Currently the club has two senior men's and eighteen junior boys teams, a Ladies team and seven girls teams playing football across six different leagues in the region. Weekend football is played on both Saturday's and Sunday's with the Accrington and District Junior Football League also hiring the club's mini soccer 3G pitch for their development football games on a Saturday morning.

We conclude our objections by asking you to consider two points that are noteworthy. First, the volume of proposed users from outside The Rydings underlines the increase in traffic which the proposal would generate. Second, **based on letters of support and objection, opinion in The Rydings is running against the proposal. The Localism Act 2011 emphasises that heavy weight should to be given to the views of the people with a detailed understanding of the situation on the ground, i.e. the local people themselves.**

SCALE AND CHARACTER. The proposed development is unsuitable not because sport is out of place in The Rydings (far from it) but because its inherent scale outstrips the absorptive capacity of The Rydings in terms of access, parking and traffic, and hence of road safety, with particular concerns after dark, and hence is **contrary to policy of the Core Strategy**. A development involving 2 acres, fence, floodlights and considerable traffic flows cannot be described as small; and, mitigations are not a solution.

The development is inappropriate in a housing estate we urge that the proposal is rejected.

Yours faithfully,

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From: [REDACTED]
Sent: 29 June 2020 15:44
To: Planning
Subject: Form completion: Planning Application Comments Form

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FORM DETAILS

Web Ref No: 20842
Form: Planning Application Comments Form
Completed: 29/06/2020 15:44:18
Status: Pending

USER DETAILS

Site user email: [REDACTED]

USER INPUTS

title: [REDACTED]
LastName: [REDACTED]
firstName: [REDACTED]
numberName: 71
postAddress: The Rydings, Langho
postCode: BB6 8BQ
refNo: 3/2020/0315
addDev: Langho Sports & Social Club Dewhurst Rd Langho BB6 8AF

comments: I am concerned that the application states that there are no Biodiversity issues to be considered. The area is home to many different types of biodiversity, some may be protected and need conserving. Additional pressure by this development and the additional human activity (Noise, Light and Pollution) could adversely affect the biodiversity that is currently insitu within this immediate area and could displace or put it at permanent risk and harm. This could include bats, roosting birds, Greater Crested newts and orchids amongst others. For the applicant not to add this to its application would seem remiss within such a rural area in the Ribble Valley.

From: [REDACTED]
Sent: 29 June 2020 10:09
To: Planning
Subject: Form completion: Planning Application Comments Form

EXTERNAL - This email originated from outside of Ribble Valley Borough Council . Do not click links or open attachments unless you recognize the sender and know the content is safe.

FORM DETAILS

Web Ref No: 20819
Form: Planning Application Comments Form
Completed: 29/06/2020 10:08:46
Status: Pending

USER DETAILS

Site user email: [REDACTED]

USER INPUTS

title: [REDACTED]
LastName: [REDACTED]
firstName: [REDACTED]
numberName: 71
postAddress: The Rydings, Langho
postCode: BB6 8BQ
refNo: 3/2020/0315
addDev: Langho Sports & Social Club, Dewhurst Rd, Lango BB6 8AF

comments:

1. I am quite upset as we have 2 children that are Langho FC members and we are regulars to the social club, however as a neighbour there was no contact, discussion or consultation prior to the planning application going into the council. This has caused a dilemma as we are strong supporters of the club, however this planning request has been sent without the right diligence and politeness that we would expect from a community stakeholder. 2. There are schools and other clubs, including Blackburn Rovers training facility at Old Langho, with premium facilities in the locality. The club must start to engage with its neighbours more effectively to use the ample provision in the area and build those contact up. 3. The council has stated to the club, that they would prefer Langho FC to put the planning application in for the Rydings rather than the less populated land off Northcote Lane to increase the chances of success of the application appears to be loaded against Rydings residents. 4. With a borehole in existence for Northcote Manor and Langholm, plus the option of placing renewable energy within the Northcote Lane site, would have less environmental/community impact than on the Rydings. 5. The 6-metre-high fencing is too high and will detract from the green open space that is mentioned in the RVBC lease agreement re Public Open Space. The fencing will be ugly and will detract from the open nature of the current land. 6. The noise and light pollution will be considerable and would extend for much longer into an evening than it currently does. This is the noise from the balls hitting fences, additional traffic and voice noise. 7. In addition, there is now considerable rubbish left by the public visiting the club. This is not currently not dealt with effectively as the club cannot afford the RVBC waste charges. The impact of more visitors will compound this problem of litter impacting on the environment and biodiversity. 8.

Even though there is a car park at the club and a very large one at the side of the Wellness centre, this is very rarely at capacity. There is therefore ample parking capacity available, yet the public continue to park on the Rydings causing congestion. This congestion will become worse as there are no parking restrictions or any traffic calming from the A59. With young children on the estate this will mean that the congestion is potentially dangerous. 9. Part of the access to the club is unadopted land and poses a risk to people walking to the club as the paths are unlit and the road is in poor condition. This risk is amplified by the additional businesses that use the access including the Wellness Centre and Conkers Nursery. 10. There is ample wildlife within the Rydings including protected species such as bats and Greater Crested Newts, many of these bats and newts have since been displaced into the surrounding trees by the current 3G pitch. Placing a much larger, lit pitch will serve to move the bats on again meaning that the area will be poorer in its biodiversity.

From: [REDACTED]
Sent: 29 June 2020 16:16
To: Planning
Cc: Laura Eastwood
Subject: Objection to planning application 3/2020/0315. Langho Sports and Social Club
,Dewhurst Road BB6 8AF

EXTERNAL - This email originated from outside of Ribble Valley Borough Council . Do not click links or open attachments unless you recognize the sender and know the content is safe.

I wish to object to the above application for several reasons, listed below.

Having lived in the area since 1996 I find the idea of a massive 6 meter high fence with 6 15 meter floodlights unacceptable for the following reasons.

1) Part of the access road is not adopted and is now full of pot holes. The Red edge should be extended to the adopted highway and notices should be served on the owners of the land which I do not believe has been done. This would mean that insufficient notice has been served and it may we'll be difficult to ascertain who owns the access road.

2) The impact visually of this massive construction would be a detriment to all the residents of The Rydings and The Dales as we currently have open countryside which would be destroyed by this pitch. This point is acknowledged within the report from GHA but no reference is made to section 52 of the planning agreement dated 23 April 1990 which binds the land as a Community Open Space. This enclosed area would be locked and would therefore contravene this and the transfer deed dated 11 February 1994.

3) The light pollution we currently have from the small all weather pitch is also bad enough so to add in 6 floodlights at 15 meters will certainly impact on my quality of life as regardless of what is contained in the report from GHA I will see the lights and have that until 10/11 every night

4) in addition to light pollution there will also be an increase in noise pollution with additional cars until late, no doubt an increase in the vocal pollution with loud parties of players and also the noise of the football hitting the fence. We currently have that problem with the small pitch. I have done some quick research and would suggest that the decibel level of this for several hours each night would exceed normal house levels which is 35db.

5) taking account of my points 3 and 4 there will be a massive impact on local wildlife. I had to have a bat survey completed when I built an extension to my property (4 The Dales) but note that on section 12 of the application no bio-diversity survey has been completed. if this 3G pitch is constructed then it will impact the Swift population who use the field to feed. I understand that they are an endangered species as their population has dropped by 53% in the last 25 years due to habitat loss. In addition we do have bats that roost in the trees at the side of the proposed pitch who will also be impacted by the light and noise as well. I understand that that bats, birds and badgers are afforded protection under UK and European law. Before anything can be done surely RVBC are bound by Section 40 of the National Environment and Rural Communities Act and have a duty to preserve Biodiversity? If there has been no survey done then the council are not discharging their duties fully.

6) The report from GHA also makes use of the NPPF 2019 to support the case for this development and talks about building a strong competitive economy. However the NPPF2019 also talks about

Social Objectives (section 8b) with open spaces that reflect the current and future needs - which I would argue this application does not support. In addition section 8c talks about improving biodiversity and moving to a low carbon economy. Again I do not believe this to be the case as it will impact the current wild life and will actually increase carbon emissions given the need for more parking spaces so would wish to object on the applications failure to address these issues.

Furthermore the NPPF 2019 makes reference in section 16 To engagement between plan makers and communities which the Football club and its agents have failed to do.

7) GHA also state that the increase in people using the club will benefit local businesses which I think is disingenuous to say the least. Kemple View is a secure unit whose patients will normally walk to shops and will now run an increased risk due to additional traffic. They do not use the club. Conkers Nursery Will not benefit or use it and neither will the Customers of the Sanctuary so I cannot see any benefit to the local economy will derive from this facility.

In addition reference is made to RVBC core Strategy which again is selective in what it wants to say as it states the application complies with the relevant sections which is not the case, so would object on the grounds that the report is incomplete.

8) I also wish to raise the issue of drainage which United Utilities have raised in their response dated 29th June 2020. The A59 now floods regularly now so the impact of the 3G pitch will make this issue worse without appropriate drainage.

[REDACTED]

4 The Dales
Langho
Blackburn
BB6 8BW

[REDACTED]

[REDACTED]
51 The Rydings
Langho
Lancashire
BB6 8BQ

Ribble Valley Borough Council
Planning Department
Council Office
Church Walk
Clitheroe
BB7 2RA

FAO Laura Eastwood

25 June 2020

Dear Sirs

RE: Application 03/2020/0315

We are writing to lodge our strong objection against the planning application above being given consent on the following grounds:

1. Our property holds a covenant over the above mention land that restricts the use of this land for recreational purpose only.

Installing any type of fence around this property is going against the terms of this covenant and we have not given the Application consent to make these changes.

2. I am also very concerned about the effect on the biodiversity of the wildlife in this area. The planning application does not contain an **Ecological Appraisal Survey** as RVBC will be aware they are bound by legislation Section 40 **The National Environment and Rural Communities Act 2006** which states that *"every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity"*.

- a. **SWIFTS** use this field for feeding. As you should be aware Swifts are in decline in Britain, by 53% since 1995 as reported by the British Trust for Ornithology in 2019. Main reason being given is the loss of habitat. Swifts are fully protected under **UK and EC laws** making it illegal to kill, harm them, damage their nests or habitat. By installing a 6m (19.68ft) high fence completely enclosing this field will prevent the swifts fully using this field for feeding causing them loss of habitat.

- b. **BARN OWLS** also use this field for feeding, they are considered endangered due to environment changes and loss of food.

TAWNEY OWLS also use this field to feed.

- c. **BATS** live and feed around this field. Bats are protected under UK Law, the **Conservation of Habitats and Species regulations (2017)**, which states "it makes it unlawful to kill, capture, injure or take a wild bat, **to disturb a bat, or to damage or destroy a place used by a bat for breeding or resting (even if the bats are not there at the time)**. Also **Wildlife and Countryside Act 1981**, which states bats receive protection from obstruction of, and disturbance at, a place of shelter or protection.

The Applicant has stated on their application **NO** to question 12(a) Protected and priority species. The Applicant has failed to consider a Biodiversity Survey to consider the impact of 6m high fencing, noise intrusion til 10pm and 6 x 15m flood lights switched on til 10pm on the Swifts, bats and owls. Flood lighting, noise from players/supporters and ball hitting fence and traffic will have an impact.

- 3. I am extremely concerned about the level of noise we will be subjected to due to:

- a. **FENCING** being hit by balls etc. Players and supporters shouting etc until 10pm.

The current smaller pitch can be heard from our property and is intrusive when we are sat in our garden or have our windows open.

- b. **TRAFFIC** – increased volumes of traffic until 10pm.

- 4. We are also concerned about the increased levels of traffic entering / leaving The Dales. As a resident I have experienced a lot of near misses from traffic exiting The Dales. The road out of our estate to the A59 has a pinch point, with increased traffic this brings higher risks of accidents. This also includes injury to horses that use this road, children, walkers and dogs.

The road to the club car park is unmaintained and currently is very pot holed. Increased traffic could cause additional deterioration to this road and damage to cars visiting the Sanctuary or Conkers Nursery.

- 5. **LIGHTING** – my house faces the direction of this field and overlooks the roof the houses next to the field. The flood lights will cause light pollution. The current flood lights on the smaller pitch cause a green haze in the sky. The smaller pitch is a considerable distance from our home and still cause noise disturbance and light pollution.

As a resident we have concerns this artificial light could be classed as a statutory nuisance as covered by **The Environmental Protection Act 1990** because we believe it will unreasonably and substantially interfere with the use or enjoyment of our homes, or be likely to injure our

health. The **Clean Neighbourhoods and Environment Act 2005** also states "*where exterior light is emitted from a premises so to be prejudicial to health or a nuisance is a criminal offence*".

On all of the above grounds we feel that the planning application should be denied.

Yours sincerely

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]
Sent: 27 June 2020 14:30
To: Planning
Subject: Application No:3/2020/0315. Grid Ref: 369072434193. Langho Sports & Social Club, Dewhurst Road, Langho.BB6 8AF.

EXTERNAL - This email originated from outside of Ribble Valley Borough Council . Do not click links or open attachments unless you recognize the sender and know the content is safe.

June 27th 2020

[REDACTED]
16 The Rydings
Langho,
Blackburn
BB6 8BQ

Application Number 3/2020/0315.
Langho Sports and Social Club.
Dewhurst Road.
Langho.
BB6 8AF.

Dear Sir,

I would like to register my objection to the proceed construction of all weather pitches and carpark at Langho Football Club for the following reasons.

The location of the football club is an out of the way place which is difficult to access by public transport therefore the increase traffic for the users of the facility will greatly impact on the residents of The Rydings, Conkers Nursery and The sanctuary of Healing. The access to the carpark will party be along an unadopted road which is at present full of potholes and poorly maintained the increase in traffic will be detrimental to this road. I feel the increased to traffic along this narrow road will be hazardous to pedestrians.

The increased traffic will have a significant impact on the local residents causing mayhem at busy times.

The appearance of the prosed massive ugly fencing will impact on the visual appearance of the estate, at present we have a beautiful open field which forms a the entrance to the estate.

I feel that the flood lighting will impact biodiversity in the area as it likely the trees which surround the area are used as a foraging area for bats and owls. I also feel that the floodlighting will be very unpleasant visually.

Using the pitches until 10pm will create a great amount of noise to our peaceful area. There is also the possibility of anti social behaviour of youths congregating in the evenings.

My family has lived on The Rydings for over 20 years it is a peaceful and pleasant place to live, the beautiful field has been used by families over the years for many types of recreation. If the application is approved I feel it will be a tragic loss of a well used community space

Yours Faithfully

A black rectangular redaction mark covering the signature area.

20th July 2020

smith&love
PLANNING CONSULTANTS

Ms L Eastwood
Planning and Economic Development
Ribble Valley Borough Council
Council Offices, Church Walk
Clitheroe BB7 2RA

Our ref: METC100/01

By email only

Dear Madam,

APPLICATION 3/2020/0315 - CONSTRUCTION OF AN ALL-WEATHER FOOTBALL PITCH WITH BOUNDARY FENCING AND FLOODLIGHTS AND AN EXTENSION OF EXISTING CAR PARK, AT LANGHO FOOTBALL SPORTS AND SOCIAL CLUB, DEWHURST ROAD, LANGHO

OBJECTION ON BEHALF OF [REDACTED]

We are writing on behalf of our clients [REDACTED] of 4 The Rydings, Langho to register their strong objection to the above planning application as local residents.

We have reviewed the application documents and consider they do not provide sufficient evidence and supporting environmental and technical information to enable the local planning authority to undertake a full and robust assessment of the need for the proposed artificial grass pitch (AGP) and its operational effects on the local area. The planning application therefore fails to demonstrate that it accords with Policies DS1, DS2, DMG1 and DMB3 of the Ribble Valley Core Strategy and we consider that no material considerations exist which justify a departure from the development plan. Planning permission should therefore be refused in these circumstances on the following grounds;

- Failure to demonstrate an understanding of and compliance with Sport England policy and guidance and national planning policy to prevent the unjustified loss of playing fields;
- Failure to demonstrate why an AGP is needed and what net public benefit it will provide in the absence of a robust evidence base and current Playing Pitch Strategy for Ribble Valley;
- Failure to demonstrate why any need for an AGP must be met at the application site in the absence of an assessment of alternative options; and,
- Failure to demonstrate that the proposed AGP is compatible with adjacent housing and that its use will not have an unacceptable impact upon residents' amenity and quality of life.

We set out the detail of each of our grounds of objection below.

Failure to comply with Sport England Playing Field policy and national planning policy

In its capacity as a statutory consultee where development involving the loss of a natural turf playing field is proposed, Sport England has submitted a holding objection to the planning application. This is dated 15th June 2020 and explains that the proposed replacement of the natural turf pitch with an artificial surface pitch breaches Sport England's Playing Fields Policy (March 2018) and must satisfy the requirements of Exception 5 of the policy before it can be considered acceptable.

Exception 5 of the Sport England Playing Field Policy only applies where;

- *The proposed development is for an indoor or outdoor facility for sport, the provision of which would be of sufficient benefit to the development of sport as to outweigh the detriment caused by the loss, or prejudice to the use, of the area of playing field.*

The Sport England consultation response confirms that the planning application does not contain sufficient information and evidence of need to demonstrate that Exception 5 is met, and it sets out the scope and detailed specification of missing information which the applicant must provide.

The Sport England Playing Field Policy is incorporated into national planning policy at paragraph 97c of the NPPF 2019 which states;

- *Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:*
 - c) *the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.*

It is also reflected in the adopted development plan at Policy DMG1 of the Core Strategy:

- *In determining planning applications, all development must:*
 - 1) *Infrastructure: Not result in the net loss of important open space, including public and private playing fields without a robust assessment that the sites are surplus to need. In assessing this, regard must be had to the level of provision and standard of public open space in the area, the importance of playing fields and the need to protect school playing fields to meet future needs.*

In the absence of the essential supporting information and evidence of need which Sport England has requested, the planning application is unacceptable. Therefore, if all of the information is not provided to the satisfaction of Sport England within a reasonable timeframe, the local planning authority must refuse planning permission on the basis of the current holding objection and conflict with the development plan and national policy. We do not expect that the local planning authority will view the application favourably in these circumstances and officers will be aware that any recommendation to support the unjustified loss of the present playing field as a departure from national planning policy will require prior notification to the Secretary of State¹.

It is possible that the applicant and/or their agent may have disregarded these fundamental policy tests and failed to provide the information and evidence of need to address them, because the matter was not raised in connection with the previous planning permission (3/2012/0225) for the junior AGP at Langho FC which was granted subject to conditions on 22nd June 2012. This is because that AGP was created on an area of amenity grassland and did not replace a natural turf pitch, and therefore Sport England Playing Field Policy Exception 3 applied and Exception 5 was not engaged.² A comparison cannot therefore be drawn with, and no weight attached to, that planning permission and/or the existence of the junior AGP, as a precedent decision or material consideration in favour of the current planning application.

¹ as required by Paragraphs 3 and 7 of the Town and Country Planning (Consultation) (England) Direction 2009

² see Sport England consultation response to planning application 3/2012/0225 of 3rd May 2012

Failure to demonstrate why an AGP is needed and what net public benefit it will provide

The precise purpose of the proposed AGP is unclear. The Planning Statement explains (at paragraphs 4.2 and 5.10) it is needed for the 'club's continued development' and paragraph 4.5 says it will be a 'significant benefit to the club' due to 'being playable all year round and for longer hours due to floodlighting, and avoiding games being cancelled due to waterlogged pitches.' Paragraph 6.1 however states that the AGP will 'provide an excellent recreational facility for the young people and adults of Ribble Valley.' It is not clear whether the proposed AGP is therefore proposed primarily to meet Langho FC's own needs or to meet demand generated by other clubs' in Ribble Valley and be available for general community use as a 'pay and play facility' on a borough-wide basis. Sport England and the Football Foundation have asked these same questions in their objections.

The applicant has not submitted any supporting evidence and rationale of the type and quality necessary to promote an AGP proposal to Sport England, the Lancashire FA and Football Foundation and the Borough Council. There has been no engagement with these bodies until after the planning application was submitted and there has been no publicity, no community consultation and no pre-application planning enquiry. The absence of a 'back story' and the lack of a published 'vision' to engage and foster support for future development and growth, is unusual for a community sports club.

As the Sport England / Football Foundation objection explains, in the absence of an up-to-date adopted Playing Pitch Strategy for Ribble Valley which would document any qualitative or quantitative unmet demand for pitches at individual club level and/or on a Borough-wide basis which an AGP would address, the applicant has not provided a robust evidence base to substantiate a need for a AGP at Langho FC. This would typically involve;

- Activity and capacity analysis to demonstrate that the number and configuration of the pitches available to Langho FC at The Rydings and Northcote Road, is insufficient and/or inadequate to meet its teams' competitive match requirements and training needs. There is no evidence of quantified over-play / capacity deficiency presented and only passing reference is made to teams travelling off-site to use indoor training facilities. There is no qualifying evidence that the club requires additional pitch capacity / flexibility to meet its teams' match and training requirements;
- There is no information provided on the quality rating of the club's pitches and evidence to show that the scope to increase capacity per pitch has been investigated, for example, by considering improved drainage and better maintenance and/or additional floodlights to improve the spread of play and training across The Rydings and Northcote Road. The Football Foundation highlights that previous drainage improvements were jointly funded and carried out in 2015 to extend the season minimise the number of match cancellations, and no explanation is given why these improvements are no longer considered adequate;
- There is no analysis of the distribution and availability of AGPs in Ribble Valley and no analysis of demand from other clubs. The last evidence prepared by the Borough Council was the 'Open Space and Sport and Recreation Provision Topic Paper' of March 2016 which incorporated the findings of the in-house draft Ribble Valley Playing Pitch Audit of 2015. Since that time, planning permission (3/2018/0372) was granted on 3rd August 2018 for the new FIFA-accredited full size (11v11) and refurbished (7v7) floodlit AGPs at the Roefield Sports

Pitches at Edisford Road, Clitheroe. The planning application for these pitches and Borough Council committee reports explain that they are provided by Ribble Valley Community Sports Trust in partnership with the Borough Council and intended to benefit Clitheroe Wolves FC, other local football clubs and community organisations to hire for matches and training sessions. It is explained that the business case and community use agreement for the pitches was informed by discussions with local clubs and Lancashire leagues³ expressing an interest for their match fixtures and member clubs' requirements;

- There is also no scenario modeling (in the form of a pitch timetable) of the distribution of the club's match and training activity across its pitches to show what effect the proposed reconfiguration and introduction of a floodlit AGP will have to meet the club's needs.

Therefore, whilst the Football Foundation response refers to an anecdotal need for additional AGP provision in Ribble Valley, it is presently unclear what level of verified supply and unmet demand exists to meet the competition and training needs of Langho FC and other clubs.

It is also unclear how a proposed AGP will be funded by the club in terms of construction, management and a maintenance sinking fund. A business plan containing pricing policies and projected income based on utilisation / activity (hours) per year (club and non-club hire) is essential to demonstrate that the facility is financially viable and its operation can be sustained over the long term. This is a key part of the information required by Sport England and the Football Foundation.

Failure to demonstrate why any need for an AGP must be met at the application site in the absence of an assessment of alternative options

Notwithstanding our objection, and the Sport England / Football Foundation objection, on the ground that the club has not demonstrated an evidenced need for the proposed AGP such that the replacement of one (or more) of its grass pitches is justified, the planning application does not explain why the proposed pitch should be provided at The Rydings rather than Northcote Road.

The Planning Statement does not express a need or preference for the proposed AGP to be provided at The Rydings and the club would presumably be satisfied if a pitch was provided at Northcote Road. The statement clearly explains that the AGP is only proposed at The Rydings because this is the preferred location suggested by the Council's Sports Development Officer. The rationale for this is not explained and a personal preference is not a binding planning consideration in any event. Further information is therefore required to explain why an equivalent or smaller-sized AGP could not replace one or both of the natural turf pitches at Northcote Road to meet the club's needs.

Moreover, if the proposed AGP is proposed solely or primarily to meet Borough-wide demand (as a community pay and play facility) and its benefit in terms of meeting the club's needs is secondary, it must be asked whether a facility of that kind should be developed at Langho FC given its location in the countryside outside and remote from a Principal Settlement or Tier 1 village. An AGP of this type at Langho FC is contrary to the spatial development strategy for Ribble Valley set out in Policies DS1 and DMB3 of the Core Strategy, and the need to achieve sustainable development per Policy DS2.

³ East Lancashire, Accrington and District and Burnley Unity Football Leagues

Further consideration must be given to the locational-sustainability of the site and its level of accessibility by non-car modes at peak times when an AGP would be most used. There are two bus services (280 - Preston to Skipton and 25 - Blackburn to Clitheroe) which operate on the A59 passing the site but the 25 is a two hour service which does not operate on Sundays and stops at 7pm. The 280 is a one hour service Monday to Saturday and two hour on Sundays but it does not pass through many towns where local clubs and supporters are located. It is inevitable that the majority of trips to an AGP at the application site would therefore be car-based and which indicates (per application 3/2018/0372) that the proposed AGP should be directed to a much more accessible and sustainable location close to a centre of population in Ribble Valley. LCC as Local Highway Authority should also be re-consulted and asked specifically whether an AGP for Borough-wide match use and training can be supported at the site given its low accessibility score.

Failure to demonstrate that the proposed AGP is compatible with adjacent housing and that its use will not have an unacceptable impact upon residents' amenity and quality of life.

In addition to the above reasons why the planning application should not succeed, The Rydings is a wholly unsuitable environment for a full size, floodlit AGP given the close proximity of surrounding houses and due to the adverse impact its extended and intensified use will have upon local residents' amenities and quality of life compared to the levels of activity and hours of use associated with the current pitch.

The playing field formed part of the Langho Centre and was retained by s52⁴ agreement for community use by the Borough Council in parallel with the housing redevelopment in the early 1990s. Planning permission (3/1993/0469) was granted for a pavilion / clubhouse with changing rooms and car parking associated with the playing field in October 1993 and it has successfully co-existed and matured with the housing development as an integrated residential environment for over 25 years. There is a limit, therefore, as to how much external use and activity can and should be accommodated at the football club given its close proximity and physical relationship with the housing and its shared setting.

As Langho FC has grown and developed, its facilities and levels of activity have increased and residents already experience unwanted levels of noise, disturbance and nuisance. The proposed AGP has the potential to be a source of major new noise, light and general disturbance/nuisance to residents compared to the existing pitch, and which will be extended over a greater number of hours per day and week. Without any information provided in the planning application about how and who will use the AGP in terms of it meeting Langho FC and/or Borough-wide match, training and community needs (as a pay and play facility), the local planning authority must assess its effects on a worst-case basis.

The application contains very little information to demonstrate that the AGP will not have an unacceptable impact on our clients' and their neighbours' residential amenity and quality of life in terms of noise, lighting, car parking and general disturbance / nuisance. The Planning Statement (paragraph 5.13) states that in the applicant's opinion the AGP will 'have no detrimental impact on the occupiers of adjacent dwellings' but this is a wholly unqualified and meaningless statement without appropriate technical evidence. As a comparison, the application provides none of the technical and environmental information which accompanied the Roefield Sports Pitches planning application (3/2018/0372) and which provides the benchmark for the range and scope of information the local planning authority must be provided with to properly assess relevant technical and environmental considerations.

⁴ superseded by s106 of the Town and Country Planning Act 1990

We consider that the following information is essential;

- Traffic and car parking assessment

Because the level of utilisation and configuration/s of the AGP is not quantified in terms of how many matches could be played simultaneously at the club at peak times, and/or how much training activity could be accommodated in the evenings, and also allowing for teams using the Northcote Road pitches to return to the clubhouse at The Rydings to socialise after playing, it is not possible to confirm whether the proposed car parking capacity and overflow (assuming the Sanctuary of Healing will continue to allow the club to use of its car park and how this can be enforced e.g. s106 agreement) will be sufficient, and that there will not be overspill parking on adjacent residential roads, causing inconvenience to residents.

No weight can therefore be placed on paragraph 5.12 of the Planning Statement as it is not based on any technical assessment and is unqualified. Moreover, paragraph 5.14 acknowledges and highlights that the difference between the existing grass pitch and the AGP - in terms of greater use and longer hours - will be 'major'.

We recommend that LCC as Local Highway Authority should therefore be re-consulted to point this out and ask whether, if assessed on a worst-case basis, the proposed car park capacity is sufficient. We suspect that LCC has not raised an objection because it has assessed the AGP as a like-for-like basis with the existing pitch and without any increase in activity levels and change in use patterns and trip generation. Whilst the worst-case level of traffic generated by the AGP may not create traffic impacts in terms of A59 network and junction capacity, the issue to be considered is on-site traffic disturbance for local residents and car park management.

- Noise impact assessment

The planning application form provides no details of the proposed opening times for the AGP and indicates that hours of use are not relevant to its consideration. The Planning Statement (paragraph 5.14) indicates that a condition per that imposed on 3/2012/0225 will be acceptable to control the times when the floodlighting must be switched off. It is essential that information is provided on the proposed hours of use of the AGP (irrespective of floodlight times) in order to properly assess the planning application and its potential to affect residential amenity.

In addition, and compared to the Roefield Sports Pitches submission (3/2018/0372), the planning application does not include a noise impact assessment. This is essential given the close relationship between the proposed AGP and our clients' and surrounding houses. An assessment must use a recognised methodology and noise exposure standards relevant to noise generated by an AGP and consider necessary noise mitigation measures and a noise management plan.

- Floodlighting impact assessment

A floodlighting plan is included with the application which shows the plotted light spread / coverage but this is not accompanied by a written assessment report to confirm the methodology and calculations carried out, and the assumed operating conditions the

assessment is based on. Again, in contrast to the Roefield Sports Pitches planning application (3/2018/0372) a far greater degree of technical information and a floodlighting scheme design is required to ensure the effect of floodlighting on residential amenity is fully taken into account. This should be designed in accordance with the Institute of Lighting Professionals: Guidance Notes for the Reduction of Obtrusive Light GN01:2011 and include a full lighting assessment with lighting calculations, spillage / coverage plots and mitigation measures.

- Protected species assessment

Whilst not affecting residential amenity, we note that the planning application is entirely silent in relation to the impact of the AGP on local biodiversity. It is understood that bats are present at the site and use surrounding woodland and buildings as foraging and roosting habitats. It is widely known that high-intensity artificial lighting will diminish the suitability of habitats for use by bats, as well as other wildlife such as hedgehogs (a Priority Species) and birds.

No survey and assessment of the potential impacts to wildlife has been carried out to inform the planning application and its consideration by the local planning authority. This is essential as artificial lighting in the vicinity of a bat roost which causes disturbance and potential abandonment of the roost, or entombs bats within the roost, can constitute an offence both to a population and to individual bats. The Bat Conservation Trust advises that guidance it has developed to reduce the negative impacts of artificial lighting on bats should be used where bats may be adversely impacted, together with advice from suitably experienced ecological consultants working with project lighting designers.

The planning application cannot be properly considered without this list of technical and environmental information and must therefore be refused.

Summary

There is much that is wrong and deficient with this planning application. It is not supported by Sport England and the Football Foundation; it contains none of the essential evidence that is required to demonstrate how the Sport England Playing Field Policy and NPPF policy tests to prevent the unjustified loss of playing fields are met; and, it provides none on the technical and environmental information necessary to show that the AGP will not have an adverse impact upon the amenities of neighbouring residents and upon protected species and local wildlife. The application is consequently contrary to the adopted development plan and does not achieve sustainable development.

Planning permission must therefore be refused.

Yours sincerely

Smith & Love Planning Consultants



cc: Client