

[REDACTED]

From: [REDACTED]
Sent: 20 June 2026 14:22
To: Planning
Subject: 3/2026/0375 Playing Fields Edisford Road Clitheroe

⚠ External Email

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3/2026/0375
Playing Field Edisford Road Clitheroe BB7 3LA

[REDACTED]
[REDACTED]
20/6/26

I object to the above application on the grounds of the following Material Planning Considerations:

1.Scale appearance and design

The Design and Access Statement (Labosport Ltd) refers to a 91m x 55m pitches area with a 3m safety run off, a 2.5 m acoustic barrier or a 3.5 m acoustic barrier (if referee whistles are used as they would be in competitive fixtures, which the design will accommodate) to the southern perimeter.

This represents an incongruous development of inappropriate scale in a public open green space in close proximity to residential dwellings in a quiet semi-rural residential location.

It is not visually sympathetic to the character of the surrounding area and is over development. RVBC (Ribble Valley Borough Council) Local Plan DMG 1 refers.

2.Impact on local residents

2.1 Noise

The Noise Impact Assessment (NIA) Acoustic Consultants Ltd – page 33 states the hours of the proposed development as 9.00-22.00 Monday to Friday, 9.00 – 18.00 Saturday and Sunday. There is no mention of bank holidays.

However, the planning application states the hours of the proposed development as 8.00 – 22.00 Monday to Friday, 8.00 – 22.00 Saturday, 8.00 – 22.00 Sunday and bank holidays.

The Noise Impact Assessment (NIA) therefore fails to accurately and adequately address the scale of the proposed opening hours and the impact on residents and is fundamentally flawed and cannot be relied upon.

The authors of the Noise Impact Assessment (NIA) could have usefully measured the noise levels of the existing 3G provision at the Edisford Road Sports Complex which is 0.3 miles from residences in Fairfield Drive which would be additionally impacted by noise from the proposed site.

We can regularly hear noise from the existing 3G pitches in the garden in the summer months and inside our double-glazed house in winter, even over the traffic noise from the busy Edisford Road.

The appeal decision APP/D1780/W/18/3219336 dated 20/05/2019 of Planning Inspector M Bale regarding Itchen 6th Form College, Southampton is of relevance in this matter as the Planning Inspector concluded that a NIA assessment method may not give a true representation of noise disturbance.

The distinctive characteristics of the noise emitting from a sports pitch through intermittent short-term events such as shouting, the thud of footballs hitting perimeter fences are easily discernible against ambient noise.

The sounds associated with sporting activities of the proposed development in this application would be particularly intrusive to neighbouring residents. There would be noise from the thud of the ball hitting perimeter fences, shouting, swearing and noise from players, spectators, coaching staff and noise from referee whistles.

The proposed opening times of 14 hours per day, 7 days per week including bank holidays would allow intensive activity throughout the year and would generate more frequent noise. There will be additional noise from car engines, car doors slamming and shouting when groups of users are exiting the facility.

The proposed development is in close proximity to family-style housing with a number of young children who will be sleeping before 22.00. During the evening and weekends, hardworking local families look forward to quiet enjoyment in their homes and gardens and in the locality.

An increasing number of local residents' work shifts as part of their employment. Noise disturbance from the proposed development of up to 14 hours per day, 7 days per week and on bank holidays would cause an unacceptable level of noise impact for residents and would harm living conditions contrary to RVBC (Ribble Valley Borough Council) Local Plan DMG

2.2 Impact on local residents – Light

RVBC (Ribble Valley Borough Council) Local Plan DMG1 states that development should not adversely affect residential and visual amenities of the area.

The proposed development will include 6 x 15m high columned floodlights. The distance from my home in [REDACTED] to the Edisford Sports Complex is [REDACTED] miles as the crow flies. The flood lights from this site are visible from inside my property.

A further 3G development in closer proximity to the residential dwellings on [REDACTED] would cause further light pollution and would detrimentally impact the sleep of young children and shift workers on 7 days per week.

The uninterrupted views currently enjoyed by residents over one of the few remaining public open green spaces in Clitheroe would be impacted by the intrusive light columns.

3:Effect on Highway Safety and Parking

The Transport Assessment (page 21) refers to a parking survey. The parking survey was carried out on Saturday 31/01/26 from 8.00 – 18.00 and Sunday 01/02/26 from 8.00 – 18.00. It was confined to the car park on Edisford Road.

The parking survey hours differ substantially from the opening hours for the proposed development which are 8.00 – 22.00 on 7 days per week. No parking surveys were carried out during winter weekday evenings or winter weekend evenings.

The weather for 01/02/26 was wet and highly unsettled (source Met Office) which may have skewed the results of the parking survey as people would be more likely to remain at home.

The parking survey failed to address the increase in traffic to the area over the summer months when there are additional visitors to the river and park. There is a pump track planned for the area which will result in increased use of the car park.

The Traffic Assessment makes an optimistic assumption that drivers will pay to park. As residents are acutely aware, on Saturday mornings Edisford Road is congested with parked cars down the roadside nearest to the Edisford Sports Complex with cars parked as far as Lancaster Drive/Edisford Road and Lancaster Drive/Fairfield Drive junctions. Obviously, this is with a view to avoid parking charges.

Hard pressed working parents and other potential users of the proposed development will simply choose to park for free in residential streets in closer proximity to the venue. This will inconvenience local residents, block driveways, cause safety hazards for pedestrians and dog walkers, and prevent access for emergency vehicles to residential streets.

The Transport Assessment parking survey has fundamentally failed to address the hours of use of the proposed development and therefore the parking impact of the proposal and the effect on local residents –. RVBC (Ribble Valley Borough Council) DMG1 – Highways, Access, and Parking.

4.Effect on Ecology and Biodiversity

The Preliminary Ecological Appraisal states that their survey was carried out on 20/01/26. It acknowledges that the proposed development will cause destructions of resting places/damage to breeding places of a protected species (bats) within a 2km radius of the site.

Bats have been continually observed from May to September every year on the proposed development site by residents for nearly 20 years. All bats have some degree of sensitivity to artificial lighting which disturbs their navigation. 6 x 15m high column floodlights would represent navigation disturbance to bats on a major scale.

The season for bats is April to September, yet the survey was carried out on 21/01/26, and as a result there was no opportunity to use static bat detectors to inform the findings of the survey.

The season for nesting birds is March – September according to the RSPB (Royal Society for the Protection of Birds). The Preliminary Ecological Appraisal was carried out on 20/01/2026 and does not accurately reflect the site biodiversity.

I would draw attention to the Edisford Rewilding Scheme which . RVBC (Ribble Valley Borough Council) implemented as recently as August 2023 to “help restore biodiversity in the Ribble Valley

and reconnect residents with nature”. This proposed development would seem drastically at odds with the objectives of the rewilding scheme.

5. Impact on the Character of the Area

The proposed development would fundamentally transform the character of the area - a green, informal public open space regularly enjoyed by the community into a regulated, formal caged facility close to residential family dwellings. The visual impact is immense and permanent.

A pay to play pitch is an incongruous commercialisation of the site to the detrimental loss of the current grass roots ethos on the site. The existing grass pitches are regularly used by teams of children, young people and adults and informal teams without problem and no nuisance to residents has ever been caused according to local knowledge.

There are existing 3G facilities a mere 0.3 miles from the proposed site. No evidence has been submitted with the current application to demonstrate that the additional proposed facilities are needed in this particular location, and no information has been provided as to why this site has been identified as the preferred option when there are other potential sites in Clitheroe.

6. Environmental Concerns

The Design and Access Statement refers to synthetic turf being utilised in the proposed 3G pitches. Crumb rubber infill from old tyres is utilised in 3G artificial pitches. It is well documented that there are carcinogenic (having the potential to cause cancer) properties in this surface such as arsenic, benzene, and lead.

A Yale University Study dated 17/09/2024 [Human Exposure to Chemicals in Artificial Turf](#) identified 306 chemicals in rubber crumb, 197 of which are carcinogenic.

These components can be inhaled, swallowed and become embedded in cuts and grazes sustained from contact with the playing surface, and adhere to clothes and football boots, as well as the carbon black in the dust produced polluting the surrounding area.

A 2024 study [Crumb Rubber in Sports Pitches in Scotland: a Case Study: Can Continued Use Be Justified?](#) by Professor Andrew Watterson of Stirling University concluded that “as there are no safe levels for carcinogens” crumb rubber should be “phased out” and replaced by natural grass or materials such as cork.

The European Commission will ban the sale of intentionally added microplastics which includes rubber infill from October 2031, and this is also due to the environmental impact of microplastics in these surfaces getting into the ecosystem.

Sport England have published a Position Statement dated 30th June 2025 highlighting that the maintenance of 3G pitches after 2031 may be difficult. The AGP Framework report construction requirements included with the planning application refers to the pitch life of 8 years.

RVBC (Ribble Valley Borough Council) will cease to exist from 1st April 2028 and will not be responsible for the maintenance of the proposed pitches and the environmental impact in the long term.

The Sports England Position Statement refers to the replacement of these surfaces as being “very expensive”. It references a DEFRA report of May 2025 which reviewed emissions of “intentionally

added” microplastics in the UK and found that 3G pitches are the highest sources of these found in the environment.

The Position Statement refers to the fact that that there are currently no widely available alternatives to infill products which are suitable for all UK weather conditions.
For these reasons, the proposed development would have a significant detrimental long-term impact on the environment.

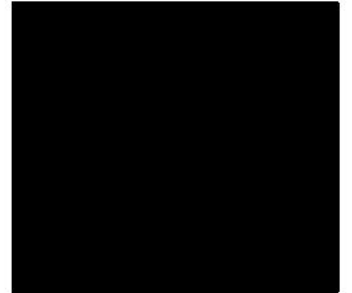
I would ask that the application is refused.

[REDACTED]

x2 same address

Head of Planning Services
Ribble Valley Borough Council
Council Offices
Church Walk
Clitheroe Lancashire
BB7 2RA

22 JUN 2026



Date: 12 June 2026

Re: Planning Application 3/2026/0375 – Proposed Synthetic Turf Pitch and Associated Works, Playing Field, Edisford Road, Clitheroe BB7 3LA

Formal Objection

Dear Sir/Madam,

I write to register my formal objection to the above planning application. Having thoroughly reviewed the submitted Application Form and Design and Access Statement (DAS), I wish to submit major technical grounds regarding the loss of public amenity, environmental disruption, and a lack of community safeguards.

I urge the Local Planning Authority to refuse this application based on the following material planning considerations:

1. Confirmed Loss of Public Open Space and Amenity

The applicant explicitly identifies the current use of the site on the formal Application Form as “*Public open space/playing fields.*” Concurrently, Section 3 of the DAS details the installation of “*4.5m high weldmesh perimeter fencing*” and lockable double-leaf gates.

By the applicant’s own admissions, this proposal constitutes a definitive loss of unrestricted public open space. It replaces a freely accessible, multi-use green area—highly valued by local residents for informal recreation—with a physically segregated, restricted-access facility. This directly violates local and national planning policies intended to protect open community spaces from exclusionary development.

2. Absence of a Binding Community Use Agreement (CUA)

The DAS explicitly relies on *Sport England Design Guidance* and references aspirations for *Football Foundation funding*. However, a fundamental prerequisite of Sport England policy when natural turf is lost is the provision of a legally binding Community Use Agreement (CUA).

No such agreement or draft framework has been provided within the application documents. Without a published CUA, the community is being asked to sacrifice a public asset with zero transparency or legal guarantee regarding pricing, community booking priority, or periods of free, unrestricted public access.

3. Unacceptable Impact of Floodlighting and Noise Pollution

The introduction of high-intensity floodlighting and the necessity of a physical “*acoustic barrier*” (as listed on the Application Form) proves that the operational reality of this site will cause severe detriment to the environmental amenity of neighbouring properties, including those on Fairfield Drive.

The application entirely lacks clarity over the proposed hours of operation. Extending intensive, floodlit use into the late evenings will cause intolerable light spill and noise disruption in a historically tranquil residential and recreational zone.

4. Visual Intrusion and Landscape Character

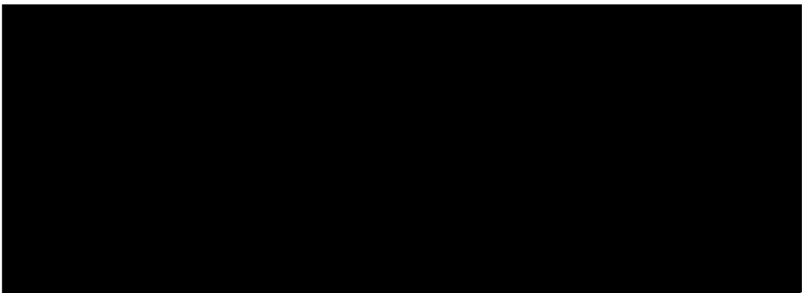
The sheer scale of the 4.5m fencing, structural acoustic barriers, toilet block, and storage containers represents a harsh industrialization of Edisford Playing Fields. This built development severely harms the open landscape character of the area, converting a natural green lung into a stark, commercial-style sports complex.

Conclusion

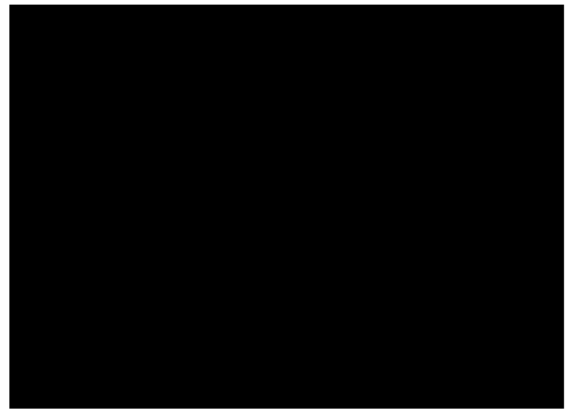
Because Ribble Valley Borough Council is acting as both the applicant and the determining authority, the highest standards of scrutiny must be applied. The application as submitted fails to protect the public’s right to free open space, fails to provide a Community Use Agreement, and introduces severe environmental disamenity to local residents.

I strongly request that this application be refused in its current form. I reserve the right to speak at the Planning and Development Committee meeting should this application proceed to that stage.

Without malice aforethought, ill will, vexation or frivolity,



Head of Planning Services
Ribble Valley Borough Council
Council Offices
Church Walk
Clitheroe Lancashire
BB7 2RA



Date: 12 June 2026

Re: Planning Application 3/2026/0375 – Proposed Synthetic Turf Pitch and Associated Works, Playing Field, Edisford Road, Clitheroe BB7 3LA

Formal Objection

Dear Sir/Madam,

I write to register my formal objection to the above planning application for the creation of a Synthetic Turf Pitch and associated works at Edisford Playing Field.

Having reviewed the documents currently available on the planning portal, I note that extensive technical information has been provided in relation to matters such as design, ecology, drainage, transport, lighting, noise, and biodiversity. However, the application fundamentally fails to provide any documentation explaining how the proposed facility will be operated, managed, and made available to the wider public once constructed.

I urge the Local Planning Authority to refuse this application based on the following material planning considerations and critical omissions:

1. Material Omission of a Community Use Agreement (CUA) and Access Policy

The application documents explain the physical development proposed but entirely fail to explain how access to the facility will be managed in practice. A fundamental prerequisite of local and national planning policy—particularly when converting natural grass playing fields—is a legally binding mechanism to safeguard public access.

The application is deficient as it completely lacks:

- Any Community Use Agreement (CUA) or draft Community Use Agreement.
- Any Community Access Plan or management, operational, and booking policies.
- Any Football Foundation funding agreement conditions or community access requirements associated with the project.
- Any Sport England consultation response addressing public protection.

Without these documents, the community is being asked to sacrifice a public asset with zero transparency or legal guarantee regarding pricing, user-group priority, or periods of free, unrestricted public access.

2. Unassessed and Definitively Detrimental Impact on Informal Recreation

The planning application lacks any assessment of the impact upon existing informal recreational use of the playing fields. Edisford Playing Field is a highly valued green asset currently available for free, unrestricted informal recreation.

Replacing this freely accessible area with a physically enclosed, managed facility introduces serious planning conflicts:

- The facility will inevitably restrict the public through a rigid booking system and charging structures.
- The application fails to demonstrate how the impact on existing informal users has been mitigated.
- No arrangements are proposed to ensure that the facility remains genuinely accessible to the wider community rather than exclusive, paying organizations.

3. Environmental Disamenity and Lack of Operational Clarity

Because the applicant has failed to provide operational management policies, residents are left with unacceptable ambiguity regarding the intensive use of high-intensity floodlighting and the associated noise pollution. Extending commercialized, floodlit sports use into late evening hours will cause significant environmental disamenity to neighboring properties on Fairfield Drive, which cannot be properly evaluated due to the applicant's omission of operational hours and management policies.

Conclusion

Given that the applicant is Ribble Valley Borough Council, the highest standards of scrutiny and transparency must be applied. The Council cannot validly grant itself planning permission when it has failed to provide the essential operational frameworks required to protect public amenity. The application as submitted fails to protect the public's right to free open space and introduces unmitigated environmental risks to local residents.

Please treat this letter as a formal objection to the application. I reserve the right to submit further comments and speak at the Planning and Development Committee meeting once the missing information listed above has been made available for public review.

Without malice aforethought, ill will, vexation or frivolity,

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