

[REDACTED]

From: Contact Centre (CRM) <contact@ribblevalley.gov.uk>
Sent: 29 August 2026 23:11
To: Planning
Subject: Planning Application Comments - 3/2026/0562 FS-Case-869505157

[REDACTED]

[REDACTED]

Lancashire

[REDACTED]

Planning Application Reference No.: 3/2026/0562

Address of Development: Blackburn Rovers Training Ground
Brockhall Village

Comments: We would like to object to the proposed development for the following reasons

1. Traffic levels

- It is inconceivable that the club states there will be no increase in traffic levels. Provision of flood-lighting and a covered seating area will mean more games and greater attendances. This will inevitably lead to more disruption to local residents

2. Proposed times of use

- The proposed times of use are excessive and unnecessary. If matches are to continue until 10pm there will be significant traffic through the village until late into the night. This will have an impact on the ability of residents to sleep with particular impact on any shift workers who may have to be getting up only a few hours later, with a potential impact on their overall well-being. It will also have a significant impact on any shift-workers who might be trying to sleep during the day. Similar projects at schools in the Ribble Valley have much tighter restrictions on hours of use

3. Parking

- I note the concerns raised by Highways and the response stating that the current parking will be adequate. This is not the case currently. It is not unusual for cars to be parked along the narrow access road (Franklin Hill) causing an obstruction to other cars or damage to the verges. At times the traffic extends further into the village, blocking driveways and obstructing resident journeys. This parking has also, in the past, delayed the passage of emergency vehicles in the village.
- It is inconceivable that the addition of a 500-seat stand will not lead to more traffic and exacerbation of the above issues

4. Air Pollution

- there will be an increase in traffic levels and a concurrent increase in pollution in the village. This may be mainly at weekends but for any weekday matches this will increase pollution exposure to the children at the local nursery, past which the traffic will all have to pass.

5. Noise pollution

- The increase in traffic (both during the construction and use phases) will lead to an increase in noise on the village. The nature of the road junctions mean that as cars pull away up a slight incline they have to increase engine revs considerably with an increased noise level.

6. Public safety

- the increase in traffic (particularly in evenings and hours of darkness) will pose a significant risk to

public safety. All of the traffic will have to pass the children's play area, immediately prior to which is a blind bend. Many children visit the play area on bikes/scooters and the increase in traffic, with drivers who do not know the area will pose an additional risk to the safety of these children.

- The road immediately approaching the proposed development is only just wide enough for two cars to pass safely. It is on a steep hill, with no street lighting and with no pavement. Many residents use this road as a dog-walking route. It also has a sharp blind bend and there have already been instances of pedestrians having to take emergency, evasive action to avoid being hit by cars.

- There is no street lighting on the above road, thus exacerbating the above mentioned risks to public safety

- spectators walking from the senior training facility to the proposed development will need to walk along the above road at a time of increased traffic.

7. Impact on wildlife

- I note the impact assessment stating there will be no impact on local wildlife. This is not true. The access roads to the development (Cherry Drive and Franklin Hill) are sites where the local badger population are regularly seen during dusk and night time hours. In the times where the football season is taking place these hours clash significantly with the times that badgers are active in the area; using the roads as paths between various wooded areas on the village and various sets. The failure to understand this is just one example of the lack of insight behind this application

8. Road use

- the access roads through the village are not designed to withstand the higher levels of traffic that will obviously accompany the development. I note that the applicant has stated that they do not expect any increase in attendances from around 160 per game. If that is the case why go to all the trouble and expense to build a 500 capacity facility? It suggests that the applicant has not undertaken a proper assessment or is being disingenuous

9. Construction traffic

- The construction of the development, should permission be granted, will require extensive construction including significant ground works including drainage. What assessment has been made about the amount of construction traffic that will be passing along roads that are not designed for such traffic and the risk to public safety as described above

Overall, this development would have a significant impact on a quiet residential area which has many children who are regularly out on bikes, scooters, playing ball games in the village as well as people walking (with or without dogs) around the village. Currently there is a noticeable impact of littering when big games occur with coffee cups and food wrappers discarded on the route from the coffee shop to the training ground. This will only increase as the footfall increases.

From the application it appears that the applicants have very limited insight into the impact upon the village and its residents. The inaccuracy of some of their statements underlines this impression as does the assertion that attendances at games is not expected to increase.

If it is absolutely vital to the existence of the academy and its retention of its current status then there is a much easier alternative at the front of village in Rover's other facility. This has much better access, better parking and would not incur any of the risks described. This facility was also the original site of the academy until Mark Hughes (as manager) decided that the first team should train there. It would seem that this is a much better solution for all concerned.

[REDACTED]

From: Contact Centre (CRM) <contact@ribblevalley.gov.uk>
Sent: 29 August 2026 16:27
To: Planning
Subject: Planning Application Comments - 3/2026/0562 FS-Case-869449362

[REDACTED]

[REDACTED]

Lancashire

[REDACTED]

Planning Application Reference No.: 3/2026/0562

Address of Development: Brockhall village

Comments: This is a private estate, should not be used for a 500 spectators stand. Parking & access into the estate

[REDACTED]

From: [REDACTED]
Sent: 02 September 2026 10:38
To: Planning
Subject: Re Application 3/2026/0562 Blackburn Rovers

⚠ External Email

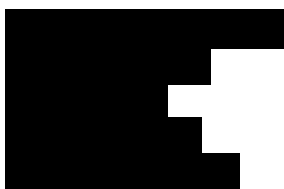
This email originated from outside Ribble Valley Borough Council. Do **NOT** click links or open attachments unless you recognize the sender and are sure the content within this email is safe.

Further to the above I we would like to object to this application, please consider the following points :

1. The planned use of floodlights at unsociable hours, will result in more noise and traffic.
2. As a [REDACTED] I have witnessed many drivers speeding while driving down to the Academy , resulting in me complaining to BRFC direct, this will only increase, with more traffic.
3. The application states only 160 on average attend the games at the academy , then why apply for 500 covered seating and standing areas?
4. The proposed "stands" are by admission basically containers - surely then a blot on the landscape ?
5. Parking: as stated above, [REDACTED] and we experience parking in front of out house at times during the season (based on the average of 160 attendees) - the current parking is NOT sufficient based on current attendances,
One of the reasons people park on Cherry Drive is that the access road to the academy is too narrow.
6. There is significant wildlife in the area, especially around the academy, deer, badgers etc , they use the track that runs around the academy as a corridor between their natural habitats , light pollution will affect the wildlife - councils have a responsibility to protect these natural corridors.
7. Why does this need to be built on the Academy land, when it would be better suited at the Senior training ground ?

Regards

[REDACTED]



7 September 2026

Lucy Walker
Case Officer, Planning Services
Ribble Valley Borough Council
Council Offices, Church View
Clitheroe
Lancashire BB7 2RA

By email: planning@ribblevalley.gov.uk
And via the online comments form

Dear Ms. Walker,

Re: Objection to Planning Application 3/2026/0562 - Blackburn Rovers Academy Training Ground, Brockhall Village - proposed floodlighting and new covered seating

We are writing jointly as [REDACTED], to formally object to the above application, including the amended lighting information submitted on 1 September 2026. Our property sits directly on the route used by traffic travelling to and from the training ground, and our household is materially affected by both the existing use of the site and, more significantly, by what is now proposed.

We note that the published consultation period formally expired on 24 August 2026. However, since amended documents and further third-party representations have continued to be added to the file as recently as 1 and 2 September, we ask that this letter also be accepted and taken fully into account before any decision is made, and that we be confirmed as consultees for the remainder of the process.

First, on consultation. We were not sent an individual notification letter for this application. We note from the Council's own published consultation record that three neighbouring properties on Franklin Hill - Millwood Manor, Braddyll House and Dinckley Brook Lodge, all sharing our postcode BB6 8HY - were formally notified and consulted from 3 August 2026. We were not. Given a development of this scale is generating impacts well beyond the site boundary - as the volume of third-party representations already on file demonstrates, several of them describing discovering the application only by chance, close to the deadline - we do not believe the consultation exercise has reached everyone materially affected, and we ask that this be recorded and corrected for any future stage of this application.

Second, on traffic, parking and highway safety. The training ground already generates noticeable traffic along Franklin Hill on match and training days, arriving and leaving in short, concentrated bursts. The proposed covered seating - more than three times the club's own stated current average

attendance of 161 - would materially increase both the volume and the concentration of that traffic. We note that Lancashire County Council's Highways response of 6 August 2026 raised no formal objection, but did so on the basis of a Travel Plan and evidence for the applicant's attendance figures which, as far as we are aware, have not yet been submitted or independently tested. We would also highlight that Franklin Hill and the estate roads within Brockhall Village are private and not maintained by the Council or Lancashire County Council; the existing road surface and security gate are already under strain from academy traffic, and any increase in evening fixtures would fall on residents, not the highway authority, to manage. Winter fixtures held in darkness present a particular risk: Franklin Hill has limited street lighting, no footpath, known blind spots, is regularly icy and unsafe in winter, and vehicles already fail to observe the village's 20mph limit. In our view this is a fundamental gap in the evidence base for the application, and a further reason it should be refused rather than approved on the strength of assurances that have not yet been tested.

Third, on light and noise. We want to be clear that noise and activity at the site during the working day, and on Saturday afternoons, is tolerable, and not something we have previously felt the need to raise with the Council. That changes fundamentally once floodlighting extends meaningful use of the site into the evening. Franklin Hill and the surrounding village are currently dark and quiet after dusk, and introducing floodlit fixtures and a substantially larger crowd in the evening would be a significant and permanent change to the character of the area. We have reviewed the amended Lighting Impact Report of 1 September 2026. Notwithstanding the amendment, it still specifies no defined curfew or operating hours - stating only that the system will comply with 'any planning curfew', without saying what that curfew should be - and it provides no upward light or sky-glow data, nor any means of monitoring or enforcing compliance once installed. The report also assesses the site against an E2/E3 environmental zone, which we do not believe reflects reality: this is open countryside on the edge of the Forest of Bowland National Landscape, and the Council's own 2015 refusal of a near-identical scheme at this site (ref. 3/2014/0931) recognised it as a dark, rural site overlooked by nearby housing, refused in part for exactly this harm to residential amenity. Nothing about the site or its surroundings has changed to justify a different outcome now. The lighting scheme has not been assessed against the correct, stricter environmental zone, and this alone is, in our view, a further reason the application should be refused as submitted rather than left to be resolved after permission has been granted.

Fourth, on ecology. The site and adjoining woodland are known to support bats, barn owls, deer, otters, badgers and hares. We are not aware that the submitted Biodiversity Net Gain report includes a dedicated assessment of the impact of floodlighting on these species, despite this being one of the three grounds on which the 2015 scheme at this site was refused. We ask that this gap be addressed before any decision is taken.

Fifth, and more broadly, we have a strategic concern about where this application leads. Blackburn Rovers have previously explored relocating senior academy operations to this junior site, with a view to freeing up the existing senior academy site for residential development. We do not believe that ambition has gone away. We are concerned that approving substantial floodlighting and covered seating at the junior site now would normalise a materially more intensive use of it, making it easier for the club to argue in future that further intensification, or an eventual relocation of senior operations here, represents no significant change from what already exists. We reject that premise entirely, and we would ask the Council to assess this application strictly on its own merits, resist any

suggestion that consent now should make a future, larger application easier to approve, and take into account the applicant's known ambitions for the wider estate when weighing cumulative impact and precedent.

We understand a detailed objection covering the relevant planning policy framework, and the deficiencies in the lighting, noise and transport information submitted with the application, has also been lodged today by [REDACTED]. We endorse and adopt the points made in that submission, and we ask that this letter be read alongside it rather than in place of it.

For the reasons set out above, we object to this application in full and respectfully ask the Council to refuse planning permission. That is our position. Only in the event the Council is nonetheless minded to grant permission, and entirely without prejudice to our objection, would we ask that consent be made subject to strict, enforceable conditions covering: a defined curfew restricting floodlit and covered-seating use to daytime hours only; a hard, monitored cap on spectator numbers; a fully tested Travel Plan and independently verified transport and parking strategy that prevents overspill parking and wear on Franklin Hill and other private estate roads; a light-spillage assessment against the correct, stricter Institute of Lighting Professionals environmental zone, including full sky-glow data; and a dedicated ecological assessment of the impact of floodlighting on protected species - each submitted and approved before any permission takes effect.

Yours sincerely,

A large black rectangular redaction box covering the signature and name of the sender.

[REDACTED]

From: Contact Centre (CRM) <contact@ribblevalley.gov.uk>
Sent: 07 September 2026 10:57
To: Planning
Subject: Planning Application Comments - 3/2026/0562 FS-Case-871775162

[REDACTED]

[REDACTED]

Lancashire

[REDACTED]

Planning Application Reference No.: 3/2026/0562

Address of Development: Blackburn Rovers Academy Training Ground, Brockhall Village

Comments: We are writing jointly as [REDACTED], to formally object to the above application, including the amended lighting information submitted on 1 September 2026. Our property sits directly on the route used by traffic travelling to and from the training ground, and our household is materially affected by both the existing use of the site and, more significantly, by what is now proposed.

We note that the published consultation period formally expired on 24 August 2026. However, since amended documents and further third-party representations have continued to be added to the file as recently as 1 and 2 September, we ask that this letter also be accepted and taken fully into account before any decision is made, and that we be confirmed as consultees for the remainder of the process.

First, on consultation. We were not sent an individual notification letter for this application. We note from the Council's own published consultation record that three neighbouring properties on Franklin Hill - Millwood Manor, Braddyll House and Dinckley Brook Lodge, all sharing our postcode BB6 8HY - were formally notified and consulted from 3 August 2026. We were not. Given a development of this scale is generating impacts well beyond the site boundary - as the volume of third-party representations already on file demonstrates, several of them describing discovering the application only by chance, close to the deadline - we do not believe the consultation exercise has reached everyone materially affected, and we ask that this be recorded and corrected for any future stage of this application.

Second, on traffic, parking and highway safety. The training ground already generates noticeable traffic along Franklin Hill on match and training days, arriving and leaving in short, concentrated bursts. The proposed covered seating - more than three times the club's own stated current average attendance of 161 - would materially increase both the volume and the concentration of that traffic. We note that Lancashire County Council's Highways response of 6 August 2026 raised no formal objection, but did so on the basis of a Travel Plan and evidence for the applicant's attendance figures which, as far as we are aware, have not yet been submitted or independently tested. We would also highlight that Franklin Hill and the estate roads within Brockhall Village are private and not maintained by the Council or Lancashire County Council; the existing road surface and security gate

are already under strain from academy traffic, and any increase in evening fixtures would fall on residents, not the highway authority, to manage. Winter fixtures held in darkness present a particular risk: Franklin Hill has limited street lighting, no footpath, known blind spots, is regularly icy and unsafe in winter, and vehicles already fail to observe the village's 20mph limit. In our view this is a fundamental gap in the evidence base for the application, and a further reason it should be refused rather than approved on the strength of assurances that have not yet been tested.

Third, on light and noise. We want to be clear that noise and activity at the site during the working day, and on Saturday afternoons, is tolerable, and not something we have previously felt the need to raise with the Council. That changes fundamentally once floodlighting extends meaningful use of the site into the evening. Franklin Hill and the surrounding village are currently dark and quiet after dusk, and introducing floodlit fixtures and a substantially larger crowd in the evening would be a significant and permanent change to the character of the area. We have reviewed the amended Lighting Impact Report of 1 September 2026. Notwithstanding the amendment, it still specifies no defined curfew or operating hours - stating only that the system will comply with 'any planning curfew', without saying what that curfew should be - and it provides no upward light or sky-glow data, nor any means of monitoring or enforcing compliance once installed. The report also assesses the site against an E2/E3 environmental zone, which we do not believe reflects reality: this is open countryside on the edge of the Forest of Bowland National Landscape, and the Council's own 2015 refusal of a near-identical scheme at this site (ref. 3/2014/0931) recognised it as a dark, rural site overlooked by nearby housing, refused in part for exactly this harm to residential amenity. Nothing about the site or its surroundings has changed to justify a different outcome now. The lighting scheme has not been assessed against the correct, stricter environmental zone, and this alone is, in our view, a further reason the application should be refused as submitted rather than left to be resolved after permission has been granted.

Fourth, on ecology. The site and adjoining woodland are known to support bats, barn owls, deer, otters, badgers and hares. We are not aware that the submitted Biodiversity Net Gain report includes a dedicated assessment of the impact of floodlighting on these species, despite this being one of the three grounds on which the 2015 scheme at this site was refused. We ask that this gap be addressed before any decision is taken.

Fifth, and more broadly, we have a strategic concern about where this application leads. Blackburn Rovers have previously explored relocating senior academy operations to this junior site, with a view to freeing up the existing senior academy site for residential development. We do not believe that ambition has gone away. We are concerned that approving substantial floodlighting and covered seating at the junior site now would normalise a materially more intensive use of it, making it easier for the club to argue in future that further intensification, or an eventual relocation of senior operations here, represents no significant change from what already exists. We reject that premise entirely, and we would ask the Council to assess this application strictly on its own merits, resist any suggestion that consent now should make a future, larger application easier to approve, and take into account the applicant's known ambitions for the wider estate when weighing cumulative impact and precedent.

We understand a detailed objection covering the relevant planning policy framework, and the deficiencies in the lighting, noise and transport information submitted with the application, has also been lodged today by [REDACTED]. We endorse and adopt the points made in that submission, and we ask that this letter be read alongside it rather than in place of it.

For the reasons set out above, we object to this application in full and respectfully ask the Council to refuse planning permission. That is our position. Only in the event the Council is nonetheless minded to grant permission, and entirely without prejudice to our objection, would we ask that consent be

made subject to strict, enforceable conditions covering: a defined curfew restricting floodlit and covered-seating use to daytime hours only; a hard, monitored cap on spectator numbers; a fully tested Travel Plan and independently verified transport and parking strategy that prevents overspill parking and wear on Franklin Hill and other private estate roads; a light-spillage assessment against the correct, stricter Institute of Lighting Professionals environmental zone, including full sky-glow data; and a dedicated ecological assessment of the impact of floodlighting on protected species - each submitted and approved before any permission takes effect.

Our Ref: HB/KN0102/26

07 September 2026

Lucy Walker
Planning
Ribble Valley Council
Council Offices
Church Walk
Clitheroe
BB7 2RA

via email

Dear Lucy,

**Objection to planning permission Ref. 3/2026/0562
Proposed Floodlighting and New Covered Seating
Blackburn Rovers Training Ground, Brockhall Village, Old Langho, BB6 8BA**

[REDACTED] to object to planning application Ref. 3/2026/0562 by Blackburn Rovers Football Club. The application relates to the training ground at the rear of Brockhall Village and proposes:

“Proposed floodlighting and new covered seating.”

Our client lives in close proximity of the site. As is explained below, his residential amenity will be detrimentally impacted by this scheme which is considered wholly unacceptable for its location.

Introduction

The application site is located on the northern edge of Brockhall Village and due to the site's characteristics and local topography it appears as part of the open countryside rather than part of Brockhall Village.

Brockhall Village is a predominantly residential area and whilst it contains a number of non-residential uses these are generally located on the periphery of the village or are low key uses compatible and in keeping with the character and quiet nature of the village.

For the reasons explained in this letter, the proposed development is considered to represent an inappropriate and unacceptable intensification of the use of the site and one that will not only be detrimental to residential amenity but will also fundamentally change the character of the site and its



[REDACTED]
[REDACTED]
[REDACTED]

compatibility with its surroundings. Approval of the development would also set an inappropriate and unacceptable precedent for further development at the site in the future.

The provision of floodlighting in this location and the introduction of covered spectator seating for 500 people would be entirely out of keeping and would give rise to unacceptable impacts in respect of residential amenity, light intrusion, traffic, parking and general disturbance.

Planning History

The site has a limited planning history, however some of its history is relevant to the Council's consideration of this application.

Of particular note and material to the Council's consideration of this planning application is application Ref. 3/2014/0931. This relates to the same parcel of land as the current application and sought planning permission for the following development

"Installation of no.8 x 15m high galvanised steel floodlighting columns to be installed around BRFC Academy Show Pitch. Each column to hold 4 x 2kw SMF/Champion Ultra Low Glare metal halide floodlight fittings with low brightness reflectors"

Planning permission was refused for the scheme in July 2015. Three reasons were given for the refusal of consent as follows:

1. *"The proposal, by virtue of light overspill and reflection from the floodlights would lead to increased visibility of the Training Ground in the local and wider landscape to the detriment of visual amenity. The proposal is therefore contrary to Policy DMG1 of the Ribble Valley Core Strategy (Adopted Version).*
2. *The proposal, by virtue of the intensification of use and erection of floodlights, would cause harm to the amenities of nearby residential properties due to associated noise and light spillage disturbance. The proposal is therefore contrary to Policy DMG1 of the Ribble Valley Core Strategy (Adopted Version).*
3. *The application presents insufficient information on bat population and ecology data to demonstrate that there would not be a detrimental impact on bat species and other species protected under the Wildlife and Countryside act 1981 (as amended) and under the Conservation (Natural Habitats and c) Regulations 1994 (The Habitats Regulations) and as such is contrary to key Statement EN4 and Policy DME3 of the Ribble Valley Core Strategy (Adopted Version)".*

The following points raised by the Council in their assessment of the scheme (as set out in the delegated officer report) are considered relevant and pertinent to this planning application:

- Environmental Health raised objection to the scheme.



As is explained below, the current application is even worse for adjacent neighbours than this historic proposal. Not only does the scheme propose floodlights similar to the 2014 refused scheme, but it also proposes the installation of 8 no spectator pods which will accommodate at least 500 spectators.

Whilst Blackburn Rovers assert that the provision of spectator seating is unlikely to result in more spectators beyond the current average of 161 and this is simply a requirement for them to retain their Category 1 Academy status, it is our client's experience that whatever development the applicant promotes it always has a much greater adverse impact than what the planning application submission suggests. One only need to look at the floodlights at the senior site for clear and unequivocal evidence of this.

It is also worth noting that the applicant sought pre-application advice in 2021 for a major redevelopment proposal at the site (RV/2021/ENQ/0010). The proposal was deemed wholly unacceptable due to the site's location in the open countryside.

Designations

On the Proposals Map accompanying the adopted Development Plan the application site is identified as lying outside of the defined settlement of Brockhall Village and thus in the '*Open Countryside*'.

The site also receives an '*Existing Open Space*' designation under Policy OS1 and is in a *Mineral Safeguarding Area*.

Whilst the site is not located within the Forest of Bowland National Landscape, it is in close proximity of it and is considered to be within its setting.

The scheme

The scheme comprises two principal elements. The erection of floodlights and the installation of 8 no. spectator pods.

With regard to the lighting, it is proposed to erect four no.16 metre high columns onto which will be installed 5 individual lights. The floodlights will provide full illumination of the entire pitch.

With regard to the spectator pods, 8 corrugated metal structures are proposed along the east side of the pitch. The Design and Access Statement indicates that the structures will provide seating for approximately 500 spectators, however in the absence of a plan and product data sheet which shows the internal layout of the structure this cannot be verified. This also means its design and capacity cannot be controlled. Furthermore, based on the illustrative image on the submitted plan it appears that the pods will have a capacity of greater than 500 spectators and that they will be moveable and could thus be moved around the application and wider site.

The application provides no information with regards car parking provision other than that there are 90 spaces at the site with additional overflow spaces at the Senior Training Centre. It should be noted that the senior site is at the opposite side of the village and also has limited provision. The submission



indicates that spectator will be transported by shuttle bus between the two sites, however not details are provided as to how this would work in practice. Furthermore, no details are presented to explain how overflow parking on residential streets will be prevented.

The application is supported by a Design and Access Statement, a Lighting Impact Report, an FRA and a BNG report. However, the application submission is missing a number of key documents, which makes it impossible for the Council and statutory consultees to properly and robustly assess the impacts of the scheme. These include the following:

- A Transport Statement which considers the traffic impact of the scheme and the impact of 500 vehicles moving through the village at the same time, together with consideration of car parking provision to meet the needs of 500 spectators.
- A Noise Impact Assessment which considers the impact of the inevitable additional noise that the development will create during the day and into the evening as a result of the introduction of floodlights and seating for 500+ spectators.
- An Ecology Assessment which considers the ecological impact of the development and proposed floodlighting. The lack of an Ecology Assessment was one of the reasons for the 2015 scheme being refused.

Planning Policy Context

Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that “*if regard is to be had to the development plan for the purposes of any determination to be made under the Planning Act, the determination must be made in accordance with the plan, unless material considerations indicate otherwise*”. Any issue that relates to the use and development of land is capable of being a material planning consideration, this includes government statements of planning policy.

The Development Plan for Ribble Valley comprises the adopted Core Strategy (2014) and the adopted Housing and Development DPD (2019).

The following policies from the Core Strategy are considered applicable to this proposal:

- Policy DS2 *Presumption in Favour of Sustainable Development* – rehearses national policy and requires development to accord with the Development Plan.
- Policy EN2 ‘*Landscape*’ – the landscape and character of the Forest of Bowland National Landscape will be protected, conserved and enhanced.
- Policy DMG1 *General Considerations* – requires development to meet a number of criteria with regards to design, access, amenity, environment and infrastructure, including the following:
 - Be of a high standard of design.



- Be sympathetic to existing and proposed land uses in terms of size, intensity and nature as well as scale, mass, style, features and building materials.
- Consider density and layout with particular emphasis on visual appearance and relationship with surroundings. Particular emphasis will be placed on visual appearance and the relationship to surroundings, including impact on landscape character as well as the effects of development on existing amenities.
- 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.
- Not adversely affect the amenities of the surrounding area.
- Consider environmental implications
- Policy DMG2 *Strategic Considerations* – within the open countryside development will be required to be in keeping with the character of the landscape and acknowledge the special qualities of the area by virtue of its size, design, use of materials, landscaping and siting. It goes on to state that protection and conservation of the National Landscape will be the most important consideration.
- DMG3 *Transport and Mobility* - states that the Council will assess proposals in the context of the development strategy but will also attach considerable weight to the availability and adequacy of public transport and associated infrastructure, including pedestrian and cycle infrastructure.
- DME3 *Site and Species Protection and Conservation* – states that development proposals that are likely to adversely affect listed sites and species will not be granted planning permission.

The NPPF (August 2026) is also a material consideration to which significant weight should be given in the decision-making process. The following policies are considered relevant to this application:

- Policy S3 '*Presumption in favour of sustainable development*' – requires the presumption in favour of sustainable development to be applied, which means outside of settlements Policy S5 should be applied and development approved where the proposal accords with both an up-to date development plan and decision-making policies in the Framework.
- Policy S5 '*Principle of development outside of settlements*' – Only certain forms of development should be approved outside of settlements. Whilst it includes development for outdoor sport this is only where the benefits of doing so would be substantially outweighed by any adverse effects, when assessed against the national decision-making policies in the Framework. The adverse effects will outweigh the benefits where there is a failure to comply with one of the



national decision-making policies which state development should be refused in specific circumstances.

- Policy DP3 '*Key principles for well-designed places*' development proposals should respond to their context, so that they integrate with and enhance their surroundings. Development that conflicts with this principle should be refused.
- Policy TR3 '*Locating development in sustainable locations*' – development that could generate a significant amount of movement in the context of the area within which it is situated, should be in locations that are sustainable. This means the location should limit the need to travel, particularly by car and offer a genuine choice of transport modes. The Connectivity Tool should be used to assess connectivity.
- TR6 '*Assessing transport impacts*' – development proposals that are likely to generate significant amounts of movement should be supported by a Transport Statement or Transport Assessment. Development proposals should be refused if they would have a severe adverse impact on the transport network or an unacceptable impact on highway safety.
- Policy P3 '*Living conditions and pollution*' – requires that development is appropriate for its location, taking into account the likely effects of pollution on health, living conditions and the natural environment. In assessing the potential effects of pollution, consideration should be given to the environment and pollution in the surrounding areas.

Within this context development is required to (b) not give rise to, or contribute to, unacceptable levels of noise or artificial light pollution; (d) not result in levels of noise exposure which would have a significant observed adverse effect and maintain the character of tranquil areas; and (e) limit any adverse impact from artificial light on local amenity, intrinsically dark landscapes and nature.

- Policy N2 '*Improving the natural environment*' – Requires development, to amongst other things, minimise any adverse impacts on biodiversity.
- Policy N4 '*Protected Landscapes*' – requires development within the setting of Protected Landscapes, which includes National Landscapes, to be sensitively located and designed to avoid or minimise adverse impacts on the Protected Landscape.

Objection

As is set out at the start of this letter, our client raises strong objection to the development and considers the proposal to erect floodlighting and 8 spectator pods on the application site to be inappropriate and unacceptable, out of character with the local area and detrimental to residential amenity. The reasons for this are explained in detail below.



Principle of Development

The development proposes the erection of a series of floodlights on 16 metre columns and 8 spectator pods capable of accommodating in excess of 500 people at any given time. The site is located directly adjacent to a residential area and in close proximity of residential properties. It is also within the open countryside and in the setting of the Forest of Bowland National Landscape. The type and form of development proposed is entirely out of keeping with its context and the character of the area and as a result is considered entirely inappropriate and unacceptable as a matter of principle, notwithstanding the current lawful use of the site.

Whilst Policy S5 of the NPPF supports development for outdoor sport in the open countryside, this is only in circumstances where the benefits of the development would outweigh the adverse impacts. In this case there are no benefits of the scheme but there are significant adverse impacts for both adjacent neighbours and the environment. Furthermore, the development very clearly conflicts with various national decision-making policies, which direct that planning permission should be refused, including Policy N4, P3, DP3, TR3 and TR4. The development also conflicts with Policy DMG1, DMG2 and EN2 of the Core Strategy.

It is also material to the Council's consideration of this planning application that planning permission has previously been refused for a similar scheme of flooding lighting at the site (Ref. 3/2014/0931). Nothing has changed at the site or in policy terms since this refusal and as such, there should be no reason why a different decision should be taken now to that taken in 2015.

The Council is however in a much better position to understand the likely impacts of the proposed floodlighting given that there is similar floodlighting in operation on the senior site. As the Council is very well aware, this lighting is highly intrusive and causes extensive spillage and sky glow. It is also highly visible from a range of local and most distant vantage points, including the A59. It clearly demonstrates that the proposed floodlighting is simply not acceptable as a matter of principle in this location.

Light Pollution

Notwithstanding the comments above with regard to the principle of floodlighting in this location, the lighting is also considered unacceptable on account of the light pollution and light spillage it will almost certainly cause. This is clear when one looks at the impact of the existing floodlight at the senior site which not only spills widely beyond the site boundaries, but also extensive upwards creating significant sky glow, which is visible a significant distance from the site.

Notwithstanding this fact, the submitted details are considered wholly inadequate and insufficient to enable a robust assessment of the impact of the proposed lighting. Furthermore, if approved with this level of information it would be impossible for the Council to control and thus prevent significant light pollution.



Whilst the application is supported by a document pertaining to be a Lighting Assessment, this does not contain a lighting assessment nor is there a proper light spillage plan. As a result, the Council is unable to carry out a robust assessment of the impact of the proposed lighting and spillage from it.

Done correctly, a light spillage plan would comprise full and complete details of lighting levels across the entire site and beyond the site boundary, including light contour plans. The lighting levels would then be cross referenced against the Institute of Lighting Professional Guidance Note 01/21 'The Reduction for Obtrusive Light'. It is our professional view that the site falls in Environmental Zone I and thus that very strict standards should apply both pre and post curfew.

Given local topography, in this case an assessment also needs to be provided of sky glow. For Environmental Zone I, the guidance states there should be 0% upward glow. Floodlighting at the senior site demonstrates the lighting is unlikely to comply with this requirement.

The report is also vague in respect of its operation. It states that the lighting system would be controlled by a "time clock or suitable control system", but it does not specify the proposed curfew, the number of days per week the lights would operate, or the precise times at which they would be switched on and off. These are critical matters for local residents and should not be left unresolved. Without clear restrictions on hours and frequency of use, the proposal creates an unacceptable risk of light pollution and harm to residential amenity.

Having regard to the above, it is our client's position that:

1. Floodlighting of the scale and type proposed in this location will inevitably given rise to unacceptable light pollution, both in terms of spillage beyond the site boundaries and upwards in the form of sky glow. What is currently a dark area in the open countryside will cease to be so.
2. The submitted information is woefully inadequate and insufficient for the Council and residents to understand the true impacts of the scheme.

The scheme is accordingly considered to conflict with Policy DMG1 and DMG2 of the Core Strategy and Policy DP3 and P3 of the NPPF.

Noise

The scheme proposes the provision of seating for in excess of 500 spectators on one part of the site. Furthermore, these spectators will be accommodated within structures where noise will reverberate. In a worse case the development could result in 500 + spectators shouting from within these structures.

The application is not supported by a Noise Impact Assessment and therefore no assessment has been provided of the additional noise that will be generated by the development or its impact on adjacent residential occupiers, which is considered likely to be significant. In order to ensure a robust



assessment of the noise impacts of the development, the applicant should be required to prepare and submit a robust Noise Impact Assessment.

The application states that average spectators' numbers are currently 161. However, the scheme delivers covered seating for 500+ spectators. The applicant asserts that the development will not result in additional spectators above and beyond those that currently attend and that this is merely a requirement of them maintaining their Category I Academy Status.

It is our client's firm view that the enhancement of facilities at the site will unquestionably increase its attractiveness and thus result in a significant intensification of the use as compared to the existing situation. This in turn will result in the site generating significant more noise for longer periods of time. Noise from the site will almost certainly extend later into the evening, particularly in winter months (as has been seen at the senior site) and will increase in volume as a result of greater numbers of players and spectators.

The applicant alleges there will not be a greater number of spectators. However, it is our client's view that this is unlikely to be the case based on past experience of other development. Furthermore, if planning permission were to be granted for the scheme, there is no mechanism for controlling the number of spectators at the site.

Furthermore, whilst the site could currently accommodate an unlimited number of people, the use is effectively self-regulating by virtue of the quality of existing facilities and the absence of floodlighting and seating. The idea that the scheme will not result in any additional spectators and/or an intensification of the use is both disingenuous and misleading.

Finally, no mention or consideration has been given to the traffic noise associated with 500+ cars moving into and out of the village and passing alongside residential properties at any one given time.

Having regard to the above, it is our client's position that:

1. The proposed development will give rise to an unacceptable increase in noise, particularly on weekend and in an evening, both at the site itself and as a result of vehicles moving in and out of the village.
2. The submitted information is woefully inadequate and insufficient for the Council and residents to understand the actual impacts of the scheme.

The scheme is accordingly considered to conflict with Policy DMG1 and DMG2 of the Core Strategy and Policy DP3 and P3 of the NPPF.

Traffic, Highways and Parking

The development will almost certainly result in a significant increase in traffic through Brockhall Village. This will take place on roads that are of substandard width and have not been designed to accommodate such high volumes of traffic. Such a level of traffic is considered unsafe and detrimental



to highway and pedestrian safety, particularly bearing in mind the potential for child playing and vehicles reversing off private drives and the fact that traffic has to pass the local park.

Given the unsuitability of roads to accommodate the scale and form of development proposed and the level of traffic generated by it, the applicant should be required to submit a Transport Statement, which includes a robust assessment of the impact of the development on the safety of roads within the village. The fact the roads within the village are not adopted is also not a reason for the Highway Authority to not consider the safety aspects of the scheme, which they seemingly have.

Notwithstanding the above, the site is also considered a totally unsuitable and unsustainable location for the type and form of development proposed.

Finally, our client is also concerned about the availability of car parking provision at the site and the high likelihood of spectators parking on residential roads in the vicinity of the site. There are also safety concerns about large number of vehicles manoeuvring and trying to find a place to park. By the applicant's own admission there are only 90 parking spaces at the site. This is woefully inadequate to cater for a development providing seating for 500+ spectators. Access to the site is also at the bottom of a steep hill on a blind bend where a public right of way crosses the road.

The applicant suggests that spectators will be shuttled back and forth from the senior site. However, no assessment is provided of the amount of car parking at the senior site, which is nowhere near 500 spaces. Furthermore, it is highly likely that games will be on going at the senior site at the same time such that the car parking will already be in use.

In short there is insufficient car parking provision to cater for the needs of the development which as a result will lead to spectators parking on residential streets detrimental to both highway safety and residential amenity.

Having regard to the above, it is our client's position that:

1. It is self-evident that this development is detrimental to highway safety within the village and that roads are not capable of accommodating the volume of traffic generated by the development;
2. The submission is inadequate in that no assessment has been provided of the traffic impact of the development and the ability of roads within the village to accommodate the traffic generated by the development in a manner that is safe and does not adversely impact residential amenity.
3. There is insufficient car parking on the site to meet the needs of the development and therefore it will inevitably give rise to parking on residential streets detrimental to highway safety and residential amenity.

The scheme is accordingly considered to conflict with Policy DMG1 and DMG3 of the Core Strategy and Policy TR3, TR6 and P3 of the NPPF.



Impact on residential amenity

Having regard to the information set out above, it is very clear that the proposed development will have a significant detrimental impact on the amenity of adjacent residential occupiers as well as occupants of the wider village.

Residential amenity will be detrimentally affected in a number of ways as summarised below:

1. As a result of increased noise from the development and noise an unsociable hours of the day and night.
2. The spillage of light and sky glow from the introduction of flood lights in an area designated open countryside and on the edge of the National Landscape that is currently dark. This is particularly problematic given residential properties sit above and overlook the site.
3. As a result of increased traffic passing on residential roads which have been designed to take low volumes of traffic. High volumes of traffic will also create increased noise and disturbance.
4. Over spill of parking onto residential streets as a result of insufficient suitably located car parking provision to serve the development.

The scheme is accordingly considered to conflict with Policy DMG1 of the Core Strategy and Policy P3 of the NPPF.

Visual Amenity

Not only are the floodlights considered detrimental to residential amenity, but by virtue of their scale and likely levels of light spillage and sky glow they are also considered detrimental to visual amenity. The floodlights will be highly visible from a range of vantage points, particularly given local topography and are likely to extended above existing boundary planting.

Planning permission was refused for floodlights at the site in 2015 on grounds of an adverse impact on visual amenity. Nothing has changed since then and so it follows that the current scheme must also be detrimental to visual amenity for the same reasons.

In this regard the scheme is considered to conflict with Policy DMG1 and DMG2 of the Core Strategy and Policy DP3 of the NPPF.

Adverse impact on the National Landscape

The site is located within the setting of the Forest of Bowland National Landscape. Planning policy requires development within its setting to be sensitively located and designed to avoid adverse impacts.

The floodlighting element of the scheme is not considered to be sensitively located and will unquestionably have an adverse impact on the setting of the National Landscape, including views into



and out of it, by reason of light spillage and sky glow. These impacts cannot be mitigated and as a result it must be concluded that the scheme is unacceptable in this regard.

The scheme is accordingly considered to conflict with Policy EN2 and DMG2 of the Core Strategy and Policy DP3 and N4 of the NPPF.

Ecology

Planning permission was refused for floodlights in 2015 due to no information being provided in respect of the impact of floodlights on ecology. The currently application remains deficient in this regard and fails to provide an assessment of the impact of the scheme on ecology. Given the open countryside location of the site and adjoining habitats this is considered essential and the application should not proceed to determination without this information.

The scheme is accordingly considered to conflict with Policy DME3 of the Core Strategy and Policy N2 of the NPPF.

Conclusion

In conclusion, having regard to information set out we respectfully request that planning permission for the development is refused on grounds of insufficient information; an unacceptable adverse impact on residential amenity by reason of excess noise and light spillage / pollution; a detrimental impact highway safety and lack of adequate car parking; an adverse impact on the setting of the Forest of Bowland National Landscape and an adverse impact on ecology.

In this regard the development is considered contrary to a range of policies within both the Core Strategy and NPPF.

If you have any queries or wish to discuss matters further, please do not hesitate to contact me.

Yours faithfully,

[Redacted signature block]

[Redacted name]



[Redacted footer text]

[REDACTED]

From: Contact Centre (CRM) <contact@ribblevalley.gov.uk>
Sent: 07 September 2026 18:01
To: Planning
Subject: Planning Application Comments - 3/2026/0562 FS-Case-871967282

[REDACTED]

[REDACTED]

Lancashire

[REDACTED]

Planning Application Reference No.: 3/2026/0562

Address of Development: Blackburn Rovers Academy Training Ground Brockhall Village Old Langho
Blackburn BB6 8BA

Comments: I wish to formally object to the proposed installation of floodlights and the provision of a football spectator stand with capacity for up to 500 people.

[REDACTED], I have serious concerns about the additional impact this development would have on traffic, parking, pedestrian safety, noise and the general quality of life for local residents.

Traffic and Road Safety

Traffic on Franklin Hill is already extremely problematic on match days. There are frequent instances of traffic becoming heavily congested, with vehicles backing up the hill and numerous near-misses and potentially dangerous situations occurring.

The existing level of traffic already creates a significant safety concern. Vehicles regularly park along residents' garden verges when parking becomes unavailable, resulting in damage to grass and residents' property.

The introduction of floodlit evening matches and a spectator stand accommodating up to 500 people is likely to significantly increase the number of vehicles travelling to the area and therefore exacerbate an already serious traffic problem.

I do not believe the existing road infrastructure is capable of safely accommodating this additional traffic, particularly during evening matches when visibility is already reduced.

Pedestrian Safety and Lack of Street Lighting

Franklin Hill is already hazardous for pedestrians after dark due to the absence of street lighting. If the proposal results in spectators parking at the Senior Training Ground, as has been suggested, this will inevitably lead to a significant increase in pedestrian footfall along Franklin Hill in the dark. This raises serious concerns about pedestrian safety, particularly given the existing traffic congestion, parked vehicles and lack of adequate lighting.

Simply directing spectators to alternative parking does not resolve the issue if those spectators then

have to walk up and down an unlit and already hazardous road.

Noise and Impact on Residents

As a [REDACTED], I already experience significant noise from football matches and activities at the Academy during the day. I accept that some of this activity takes place during normal working hours and, within reason, I have no objection to that.

However, the introduction of floodlights would fundamentally change the nature and duration of the activity.

There is a significant difference between accepting noise and activity during the daytime and being expected to tolerate the noise of evening and night-time matches, potentially involving up to 500 spectators, effectively in my own back garden.

The additional shouting, cheering, announcements, vehicle movements and general activity associated with a large spectator crowd would have a considerably greater impact on residents during the evening, when people reasonably expect their homes and gardens to be quieter.

Cumulative Impact

My concern is not simply with any one aspect of the proposal, but with its cumulative impact.

The combination of:

Increased traffic on an already congested and hazardous road;

Additional pressure on inadequate parking provision;

Vehicles parking on and damaging residents' garden verges;

Increased pedestrian movements along an unlit road;

Floodlighting and evening activity;

Noise from potentially 500 spectators; and

The extension of football activity into the evening and night-time;

would represent a substantial increase in the impact of the Academy's activities on the surrounding residential area.

I believe these matters require very careful consideration before any permission is granted.

The current situation on Franklin Hill already presents significant traffic and safety problems on match days. Increasing the capacity of the facility and introducing floodlit evening matches without adequately addressing these existing problems would, in my view, be unreasonable and would place an unacceptable additional burden on local residents.

For these reasons, I respectfully ask that the proposed floodlights and spectator stand be refused.