

Dear Sirs

Having reviewed the proposals in the latest consultation version of Pendle Local Plan I have the following comments to make:

The Colne Neighbourhood Plan was adopted in 2023 on the 28th of September. The new local plan ignores this democratically endorsed Neighbourhood plan by turning a blind eye to policy CNDP 10 and Plan CNDP 10/8.

This policy is set out below;

6.3.22 Policy CNDP10 identifies, following a review of existing information in the Local Plan, and seeks to protect the key sport and recreation facilities in the town. These include, in the main, the town's key outdoor sport and recreation facilities that support football, cricket, golf and other outdoor sports and the town's main indoor sport and recreation facility, the Leisure Centre. Policy CNDP10 consolidates the approach taken in the Pendle Core Strategy. For clarity, the corresponding site numbers in the Pendle Open Space Audit are shown against each site identified in the policy

6.3.23 By protecting, enhancing and supporting improvements to sport and recreation facilities Policy CNDP10 supports PLPCS Strategic Objective 9 that seeks to protect and improve such facilities, so as to improve health and well-being through the promotion of more active lifestyles.

6.3.24 The approach set out in Policy CNDP10 is in line with national planning policy in chapter 8 of NPPF, that, in particular, states: "Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
- b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
- c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use."

(NPPF, paragraph 99).

The criteria for removing these playing fields (points a,b and c, above) cannot be met and as such proposing them for building is against this recently adopted Neighbourhood Plan.

- a. Namely that no (published and above board) assessment has been undertaken which proves the land is surplus;
- b. The loss is replaced by better provision (there isn't any land available in the vicinity)
- c. It is not being proposed for alternative sports/recreational provision.

So the points in para 6.3.24 have not been met and I would suggest it's a high bar to do so.

I would place on record that there appears to be some willingness from the landowner to deliberately provide insufficient maintenance of this green space, contrary to their agreement in the S106 (which was part of the agreement to allow them to build on the site next door) which states they must undertake regular maintenance of the fields thereby allowing them to be well used.

The maintenance they should be undertaking is contained in section 5 of the 106 agreement and states treatment to the pitches should be kept in a proper and groundsman like manner to a playable standard and should included;

- 5.1 Cutting the grass to between 20-70mm
- 5.2 Tractor mounted spiking
- 5.3 Chain harrow spiking up and down
- 5.4 Applying herbicide
- 5.5 Applying sand (1 ton per week)
- 5.6 Fertiliser (spring and summer)
- 5.7 Line and mark
- 5.8 Over mark with dry powder
- 5.9 Erecting posts
- 5.10 End of season reinstatement.

Photo A was taken from Google Earth and it illustrates nicely one of the main drains on the playing field and its herringbone tributary drains. Photo B shows the corresponding area and the playing field's current status. The College has instructed that the land highlighted in red should now no longer be maintained and left to go wild. As there is a slight camber on the playing field, the water naturally flows into this highlighted area in high rainfall but as it is no longer maintained, i.e. not mowed, sanded etc, the water stands as it can not reach the drains. This is the same issue throughout the playing fields as the college instruction is to ignore maintenance on any area outside of the pitches. All these areas are left to go wild, therefore they are not sanded, mowed or maintained as the S106 states, hence in high rainfall, water pools on the pitches as lack of maintenance has reduced ground seepage to the drains.

Photo A



Photo B



Can we ask that the exact maintenance undertaken by the college is supplied as part of this process. I'm sure we can get verifiable evidence from an independent assessor that this work has not been carried out with the regularity intended and defined in this agreement. Failure to provide the correct accessible and well tended playing pitches could be interpreted as a deliberate ploy to render them as unfit and thereby try to establish they are surplus to requirements. This is NOT the case and if they were maintained to a fit standard they would be better used than they currently are.

In conclusion I object to the classification of the playing fields as building land in the new Local Plan for the reasons stated above. It is undemocratic following the adoption last year of the Neighbourhood plan and the S106 entered into by the landowner which is not being implemented. This is resulting in a 'not to disguised' cynical attempt to build on the land. This is the second time they have tried to do this and must be resisted as playing fields are a vital part of our heritage and future for the young people of Colne.

Kind Regards

JDCrossley

