

# Central Lancashire Local Plan Publication (Regulation 19) Draft

## Representation on behalf of Northern Trust Land Ltd Policy HS5 Open Space and Playing Pitch Requirements in New Housing Developments

- 1.1. De Pol Associates are retained by Northern Trust Land Ltd to submit representations to the Publication (Regulation 19) draft of the Central Lancashire Local Plan 2023-2041 (CLLP). This representation relates to Policy HS5 'Open Space and Playing Pitch Requirements in New Housing Developments'.
- 1.2. The policy states that all major new residential developments must make provision for open space in accordance with standards set out in the table within the policy. However, it is unclear as to where these standards have come from and they are not justified in the policy, which is especially relevant given that the table sets completely different standards for each Borough.
- 1.3. By way of example, with regards to natural and semi-natural greenspace the policy requires major development in Preston to provide 2.21ha per 1,000 head of population, but in South Ribble it is 1.8ha and in Chorley it is 6.51ha. The CLLP evidence base includes the Central Lancashire Open Space Assessment Report dated February 2019 includes reference to Fields In Trust (FIT) providing a national guideline of 1.8ha of natural and semi-natural greenspace per 1,000 head of population. There is no explanation in the policy as to why major development in Preston and Chorley should be required to deliver more than this national guideline, or why major development in Chorley should have to deliver over 3 times the amount of natural and semi-natural open space than major development in South Ribble and just under 3 times the amount in Preston.
- 1.4. It appears that these standards are simply based on existing levels of open space in each borough. In this respect the Lancashire Open Space Assessment Report identifies the levels of provision in the three boroughs for the open space typologies together with the FIT national

benchmark. Table 1 below compares these with what is proposed in policy HS5. It is evident that the open space requirements in policy HS1 are therefore simply based on existing levels of provision rather than national benchmarks or any assessment of actual need.

Table 1: Open Space Provision and requirement

Open Space typology	Hectares per 1,000 population						
	National Benchmark	Current provision			Policy HS5 Requirement		
		Preston	South Ribble	Chorley	Preston	South Ribble	Chorley
Parks & Gardens	0.8	1.81	0.76	1.72	1.73	0.76	1.67
Natural and semi-natural green space	1.8	2.31	1.81	6.42	2.21	1.8	6.51
Amenity green space	0.6	0.49	1.31	0.85	0.47	1.29	0.86

- 1.5. NPPF23 paragraph 102 requires planning policies to be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate.
- 1.6. Taking natural and semi-natural (N&SN) greenspace as an example, given that Chorley has 3.6 times the amount of N&SN greenspace than the national benchmark and the amount of N&SN greenspace in South Ribble, on what grounds is it necessary and justified to expect major development in Chorley to deliver 3.6 times the amount of N&SN greenspace than the same development in South Ribble.
- 1.7. This policy is considered unsound as contrary to NPPF23 it is not based on robust and up-to-date assessments of the need for open space, with the evidence base appearing to be 6 years old. Furthermore, it is not justified for reasons highlighted above.