

Central Lancashire Green Belt and Other Open Land Designations Review

Sender

LUC

Recipient(s)

Central Lancashire Local Plan Team

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1 Introduction

In 2012, the three Central Lancashire local authorities (Preston City Council, South Ribble Borough Council and Chorley Council) published a Joint Core Strategy (JCS) designed to inform the strategic direction of each Council's more detailed Local Plans, all three of which were adopted two years later in 2015. A review of the adopted Joint Core Strategy and separate Local Plans began in 2018 and a decision was made to start work on the preparation of a new Joint Central Lancashire Local Plan. The new Central Lancashire Local Plan will update the strategic policy objectives in the adopted Core Strategy and consolidate and update the detailed non-strategic policies in the adopted Local Plans.

To inform the preparation of Joint Central Lancashire Local Plan, LUC has been commissioned to:

- undertake an independent assessment of the **strategic role and function of Central Lancashire's Green Belt**, the **valued characteristics of its landscapes** and the **setting of its settlements**, including **settlement gaps**.
- **review the scope and function of the policies** set out in each of the participating authority's existing Local Plans to inform the development of replacement policies for the Joint Plan that share a common approach and terminology.

The following draft assessments have been prepared:

- **A strategic Green Belt assessment** (this covers all of the existing Green Belt, safeguarded land and other areas designated as open countryside in Preston and Chorley).
- **An assessment of areas of separation in Preston** (areas of separation in South Ribble and Chorley were assessed as Green Belt).
- **A strategic-scale assessment of landscape value** (this covers all of Central Lancashire's open land).
- **A strategic-scale assessment of settlement settings** (this was applied to all settlements inset from the Green Belt and all settlements of a comparable size in countryside areas outside of the Green Belt).

Drawing on the findings of these assessments, this note provides a review of the potential policy options that the Central Lancashire Authorities may wish to consider for inclusion in the Joint Local Plan.

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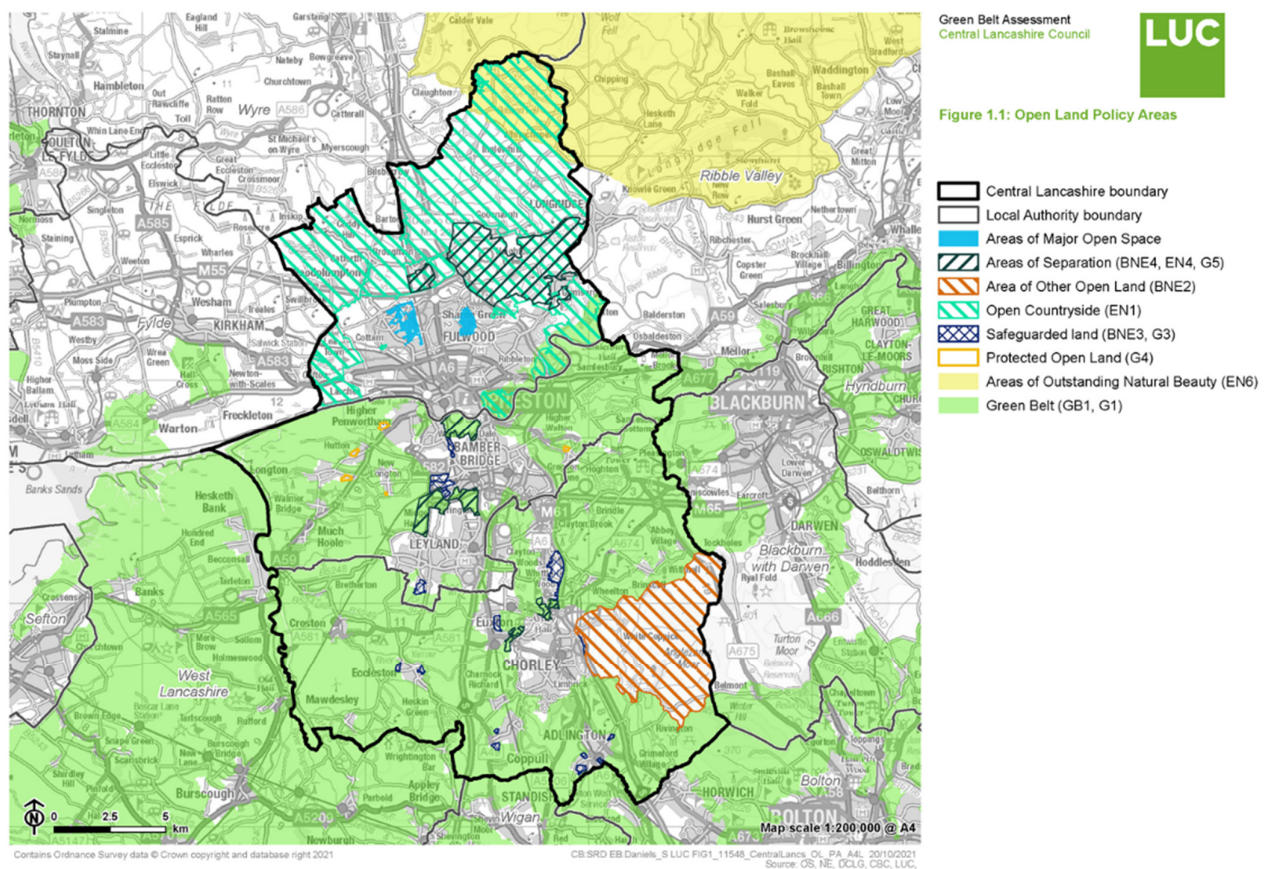
2. Summary of Existing Policies

The following open land policies are currently included in the existing local plans:

- Open Countryside (Preston, Chorley).
- Protected Open Land (South Ribble).
- Green Belt (all authorities).
- Safeguarded Land (South Ribble, Chorley).
- Areas of Separation (all authorities).
- Areas of Major Open Space (Preston).

These policies are summarised below and their extent is illustrated in **Figure 1.1**, but more detail on these individual policies is included in the Open Land Designations Study: Landscape Assessment Report and Green Belt Report.

Figure 1.1: Open Countryside / Protected Open Land Policies



At present there are three main policies within the existing Local Plans that are seeking to protect the open countryside from development. These include:

- **Preston City Local Plan (2015) Policy EN1 – Development in the Open Countryside.** This policy covers all unallocated land to the north and west of Preston. It partially overlaps with the Green Belt designation around the Ribble Valley. It is a spatial policy that restricts development within this area except for agriculture or forestry purposes, re-use of existing buildings and infilling within rural settlements. The policy is designed to deliver the spatial vision of the JCS as set out in JS1 to create sustainable patterns of development and minimise the scale of development at lower order locations. The policy does not require the decision maker to consider the landscape and visual impact of a proposal or exercise a judgement as to the influence development would have on the openness and or rural character of an area. This was confirmed in the Inspector's conclusions of the Goosnargh co-joined Inquiry.
- **South Ribble Local Plan Policy G4 – Protected Open Land.** In contrast to EN1, Policy G4 is applied to relatively small pockets of land adjacent to settlements that are inset from the Green Belt. A number of the sites that are now Protected Open Land (POL) were, in the previous South Ribble Local Plan, designated either as land safeguarded for future development or identified for local development needs. The implication is that many or all of these sites were originally excluded from the Green Belt, when the boundary was drawn in the 1990s, because it was considered that they might potentially be required to meet future development needs. The G4 policy supporting text indicates that the Council wished to protect these areas because 'there will be no strategic Green Belt review during the Plan period'. Unlike EN1, the wording of G4's supporting text indicates that the POL sites were valued for their role in relation to the adjacent settlements: in ensuring 'natural breaks in the built-up areas and settlements' and in fulfilling "a key role in the character, appearance and openness of these settlements". This is not however carried through to the policy text.
- **Chorley Local Plan (2015) Policy BNE2 – Development in the Area of Other Open Countryside.** In keeping with policies EN1 and G4, BNE2 indicates a blanket constraint from development that isn't for agriculture, forestry or other otherwise appropriate to a rural area. This clearly suggests a value relating to the landscape of the one, large area to which it applies: "the West Pennine Moors and the associated land to the east of the M61". The text indicates that its exclusion from the Green Belt is because of the unlikelihood of any merger with settlements farther to the east (presumably referring to the larger settlements of Darwen, Bolton or Blackburn, rather than intervening smaller villages), and goes on to refer to the West Pennine Moors as a 'special landscape'. Since the publication of the Local Plan much of the BNE2 area has been designated as a SSSI, but most of the BNE2 area excluded from this biodiversity designation (which constitutes an absolute constraint to built development) is the land closest to Chorley.

Green Belt

Two of the existing Local Plans include policies relating to Green Belt:

- **Preston City Local Plan (2015) Policy GB1 – Green Belt.**
- **South Ribble Local Plan (2015) Policy G1 – Green Belt.**

In both cases the policies repeat national Green Belt planning policy set out in the NPPF.

The Chorley Local Plan (2015) does not have a specific Green Belt policy but there are a number of references in other policies to national Green Belt policy.

Safeguarded Land

Both the South Ribble and Chorley Local Plans identify safeguarded land for future development:

- **South Ribble Local Plan (2015) Policy G3 – Safeguarded Land for Future Development**
- **Chorley Local Plan (2015) Policy BNE3 – Areas of Safeguarded Land for Future Development Needs**

The purpose of safeguarded land as set out in the NPPF is to meet longer-term development needs stretching beyond the plan period.

Areas of Separation

Areas of separation are identified as key policies within the Core Strategy and all three Local Plans as follows:

- **Central Lancashire Joint Core Strategy Policy 19 – Areas of Separation and Major Open Space** seeks to “protect the identity, local distinctiveness and green infrastructure of certain settlements and neighbourhoods by the designation of Areas of Separation and Major Open Space, to ensure that those places at greatest risk of merging are protected and environmental/ open space resources are safeguarded”. The policy identifies several Areas of Separation around northern settlements and within the Preston urban boundary (Preston), and between central and southern settlements (Chorley and South Ribble).
- **Preston Local Plan Policy EN4 – Areas of Separation** seeks to prevent “harm to the effectiveness of gaps between settlements and, in particular, the degree to which the development proposed would compromise the function of the Area of Separation in protecting the identity and distinctiveness of settlements”. Areas of Separation are identified between: Broughton and the Preston Urban Area; Goosnargh Whittingham and Grimsargh; and Grimsargh and the Preston Urban Area.
- **South Ribble Local Plan Policy G5 – Areas of Separation** seeks to prevent built-up areas from merging into one another and to protect the land within the boundary from inappropriate development. Three Areas of Separation are identified: between Bamber Bridge and Lostock Hall; between Walton-le-Dale and Penworthan; and between Farington, Lostock Hall and Penwortham.
- **Chorley Local Plan Policy BNE4 – Areas of Separation** seeks to protect built-up areas from merging into each other and maintain the openness of these areas of countryside by preventing inappropriate development. Two Areas of Separation are identified between Chorley and Euxton and between Chorley and Whittle-le-Woods.

Areas of Major Open Space

Preston Local Plan Policy EN5 – Areas of Major Open Space is primarily concerned with maintaining separation between urban neighbourhoods in Preston. It is applied to two areas - between Ingol/Tanterton and Greyfriars/Cadley; and between Sharoe Green and Fulwood. It seeks to prevent development within the Areas of Major Open Space unless certain criteria are met, including “... d) the proposal does not detrimentally affect the visual amenity, landscape amenity, landscape character or nature conservation value of the open space/Area of Major Open Space...”.

3. Potential Replacement Joint Plan Policy Options

Table 1.1 explores the policy options available to the Central Lancashire authorities and their relative positives and negatives in achieving the three authorities’ aim of protecting the open countryside from development. In summary, the policy options considered are:

- **Open Countryside** – whether the current open countryside policies are appropriate, and if so whether a rationalised policy should be purely spatial or should refer to landscape value and settlement identity and setting?
- **Green Belt** – whether there would be a case for any strategic changes to Green Belt, ie to create new Green Belt in areas currently subject to other open countryside designations eg in Preston? This note does not consider the release of land for development purposes, as this will be subject to further considerations beyond just Green Belt matters.
- **Area of separation** – whether a policy relating to settlement gaps should be retained and/or redefined?
- **Settlement setting** – whether a policy should be considered to protect land that contributes to settlement setting?
- **Landscape** – whether a policy should be considered to protect land that contributes to landscape quality?
- **Large open spaces in urban areas** – whether a policy should be included protecting large areas of open land within urban areas?

The policy options identified are not mutually exclusive as in some cases they have different objectives – ie protecting open land, protecting landscape quality and/or the setting of settlements etc. It is therefore likely that a combination of the potential policy options will be most appropriate for incorporation into the Joint Plan.

Table 1.1: Policy Option Evaluation

New policy option	Content and coverage	Existing policy	Pros (+) and cons (-)
Open Countryside Policy Options			
<p>1. Retention of current open countryside policy (EN1) that is purely spatial – ie no reference to landscape or other roles of open land.</p>	<ul style="list-style-type: none"> • Policy could include current coverage in Preston, except it shouldn't overlap with Green Belt designation ie no need to include area along Ribble Valley currently covered by both policies. • Potential inclusion of all, or part of BNE2 open land east of Chorley. 	<p>EN1</p>	<ul style="list-style-type: none"> + Continuity. + Including land in Chorley makes it less Preston-specific. + Will restrict development outside those areas allocated in the Local Plan and which aren't in the Green Belt. - Current policy isn't positively framed. May be challenged at examination. - May constrict growth more than is desirable. - Blanket protection doesn't reflect variations in the environmental value of land eg landscape quality. - Weaker protection than Green Belt, so danger that challenges will be directed to this area if Councils are unable to demonstrate a 5yr housing supply.
<p>2. Removal of current open countryside policy (EN1)</p>	<ul style="list-style-type: none"> • Policy could be removed in favour of more targeted policy alternatives outlined below. 	<p>EN1</p>	<ul style="list-style-type: none"> + Opportunity to clarify and reframe open countryside protection across three authority areas. + Increase protection of most sensitive/important locations. + Increase scope for growth in less valuable parts of open countryside. - Potentially less extensive local countryside protection – ie Council may want to define exceptions to the policy.

New policy option	Content and coverage	Existing policy	Pros (+) and cons (-)
Green Belt Policy Options			
1. Expansion of Green Belt policy	<ul style="list-style-type: none"> • Could extend Green Belt to include some or all land in Preston beyond motorways and Preston Western Distributor Road. • Could try to extend to include land in Chorley that isn't protected by absolute constraint (SSI). 	BNE3, G3	<p>+ Green Belt policy holds national significance and is strongly supported by the general public and their political representatives.</p> <p>+ LUC's analysis suggests that there are areas of land to north east of Preston that would contribute to the Green Belt purposes to a significant degree.</p> <p>+ Adding open countryside in EN1 and BNE2 would create consistency across Central Lancashire. GB study suggests that land in these areas would make a similar contribution to the GB as existing areas of GB.</p> <p>- Overly restrictive policy leaves vulnerability to planning approvals if 5yr land supply can't be demonstrated.</p> <p>- Once established, new Green Belt land is not invulnerable to inappropriate development or alterations to their boundaries to accommodate growth. The NPPF sets out 'very special' and 'exceptional' circumstances for development within Green Belts and Green Belt release, respectively. Therefore, the designation of a new Green Belt would not prevent development in the open countryside.</p> <p>- Difficulty in getting new GB designated. It would be difficult to justify a new GB as would need to demonstrate consistency of a Green Belt policy with strategic policies in adjoining authorities, the necessity for a Green Belt, why normal planning and development management policies would not be adequate and how the new Green Belt would meet the objectives of the NPPF.</p>

New policy option	Content and coverage	Existing policy	Pros (+) and cons (-)
			<p>- National Green Belt policy is often misinterpreted to be a landscape, greenfield and/or green infrastructure protection designation rather than a simple spatial planning policy. There are arguably more effective means of protecting and managing these other important environmental issues than Green Belt policy. For example, the NPPF does require local planning authorities to set out measures to enhance the beneficial uses of established Green Belt land, but the bar to demonstrate this is relatively low when compared to other more environmentally focused planning issues, such as the need to demonstrate biodiversity net gain, i.e. there are arguably more proactive and effective means of simultaneously protecting and enhancing the multiple functions of open countryside.</p>
Area of Separation Policy Options			
<p>1. Retention of a policy for settlement gaps</p>	<ul style="list-style-type: none"> • Could exclude gaps already protected by Green Belt. • Could be extended to incorporate other gaps which have been identified as being moderately fragile. • Could reference evidence base which identifies key elements/criteria for retaining gaps, rather than being prohibitive of any development that falls within a defined gap (so gaps can be drawn quite broadly). • Could define a single large area around Preston within which maintenance of settlement gaps is a consideration, rather than specific gaps. • Could extend policy to take into consideration value of land in providing a distinctive setting to a settlement. If also extended to include Green Belt land this would add weight to protection of fragile settlement gaps in South Ribble and Chorley beyond main urban area, 	<p>EN4, BNE4, G5</p>	<ul style="list-style-type: none"> + All 3 LPA's have an 'areas of separation' policy. + Areas of separation are relatively simple designations, which are easy for the general public and developers to understand and planners to implement, as long as the protected characteristics of each defined gap are clearly communicated in policy. - Currently identified gaps in South Ribble and Chorley are already protected by Green Belt designation. - Difficult to define precise gaps on a map. - Two gaps in Preston at present are quite disparate in terms of scale. - Proposed developments around Goosnargh not rejected on basis of impact on gap due to its size.

New policy option	Content and coverage	Existing policy	Pros (+) and cons (-)
	<p>which do not rate strongly for contribution to Green Belt purposes.</p>		<p>- Areas of separation policies are focused on protecting specific areas of open countryside in between neighbouring settlements, so large areas of open countryside that do not fall within strategic and/or fragile gaps between settlements would remain unprotected from encroachment by such policies.</p>
Settlement Setting Policy Options			
<p>1. Retention of a policy to protect land which contributes to settlement setting (G4 indicates that designated areas provide <i>"natural breaks in built-up areas and settlements"</i>, and perform <i>"a key role in the character, appearance and openness of these settlements"</i>)</p>	<ul style="list-style-type: none"> • Could develop policy that seeks to protect and enhance settlement setting. • Currently only designated in South Ribble but could be applied more generically to all settlements and use landscape evidence base to identify features/area that contribute to settlement character/setting. • LUC assessment doesn't indicate any particular value for the currently designated areas in G4, so hard to justify only designating these areas in South Ribble. Some were formerly safeguarded land. 	<p>G4</p>	<p>+ Would seek to protect setting of all settlements where there is appropriate justification.</p> <p>+ Could cover sensitive gaps between settlements, offering scope for consolidation with Areas of Separation Policies.</p> <p>- Settlement setting policies are focused on protecting specific areas of open countryside in setting of settlements, so large areas of open countryside that do not fall within strategic and/or fragile gaps between settlements would remain unprotected from encroachment by such policies.</p> <p>- Settlement setting policies would likely not prohibit development in the open countryside if such development could demonstrate minimal impacts on setting.</p>
Landscape Policy Options			
<p>1. New local landscape designation policy</p>	<ul style="list-style-type: none"> • Could include an area-based policy protecting areas of 'above ordinary landscape value' or similar, as identified in the LUC landscape assessment. 	<p>BNE2</p>	<p>+ Policy is supported in revised NPPF that states, at para 174, that policies should <i>"contribute to and enhance the natural and local environment by... protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan)"</i>.</p>

New policy option	Content and coverage	Existing policy	Pros (+) and cons (-)
			<ul style="list-style-type: none"> - Areas identified as 'above ordinary value' in LUC study are largely already protected by absolute constraints. - Landscape policies are focused on protecting specific areas of open countryside, so large areas of open countryside that do not fall within policy would remain unprotected from development – unless covered by other policies.
2. Criteria-based landscape policy	<ul style="list-style-type: none"> • Could include a criteria-based policy for protection of valued landscape qualities, ie to protect the 'key qualities', valued features and key characteristics listed for each LCA. This option could be linked to a separate landscape character policy and cross reference the landscape study prepared by LUC. • Policy could recognise the intrinsic character and beauty of the countryside and protect and enhance character with reference to the LCA and any further evidence base produced. 	Core Strategy Policy 21	<ul style="list-style-type: none"> + Would ensure that focus would be placed on protection of key landscape qualities rather than a blanket and undefined requirement to protect the landscape. - Landscape policies would not prohibit development in the open countryside if such development could demonstrate minimal impacts on landscape qualities. - Council officers would need to draw on findings of landscape assessment and understand the key landscape qualities and the extent to which a proposed development is likely to affect these. This may require a degree of landscape skills training.
Large Open Spaces in Urban Areas Policy Options			
1. Retention of policy protecting large open spaces within urban area	<ul style="list-style-type: none"> • Some parts of the Central Lancashire's urban area within South Ribble are largely contained offering some potential scope for the expansion of this designation. • South Ribble has a Green Corridor/ Wedge policy (G12) which is similar, and maybe appropriate to consider consolidation. 	EN5, G12	<ul style="list-style-type: none"> + Protects large relatively accessible open spaces which may be or could be valuable locations for leisure and recreation uses. + Covers areas too contained to treat as open countryside, so valid to have specific policy. - Only applied to 2 areas in Preston. - EN5 is wide-ranging policy which cites prevention of merger, landscape character, visual amenity, recreational

New policy option	Content and coverage	Existing policy	Pros (+) and cons (-)
			<p>and GI value. These purposes could be considered more widely applicable?</p> <ul style="list-style-type: none"> - Could consider alternative designation such as Local Green Space. - Cover discrete areas and would therefore not protect all greenfield land from development.

4. Policy Recommendations

The exceptional circumstances needed to justify the designation of a new Green Belt in Central Lancashire are extensive, and there is currently insufficient evidence to determine whether it would be possible for the following reasons:

- The sustainable scale and distribution of growth across Central Lancashire has yet to be agreed and justified.
- Alternative local policies have not been ruled out as unsustainable, or unreasonable in meeting Central Lancashire's policy objectives.
- The implications of Green Belt extensions on the cooperating authorities' immediate neighbours have not been explored.

It is therefore recommended that the Central Lancashire authorities pursue alternative local policy mechanisms for protecting the open countryside at this time:

1. It is recommended that open countryside policy EN1 is deleted in favour of relying on the Councils preferred spatial strategy to provide a simple blanket protection of the open countryside, assuming growth is focused with existing urban areas and specific allocated greenfield sites. Policy wording could be added to the spatial strategy to:
 - a. Clarify what types of development are appropriate in the countryside ie beyond the proposed areas of defined growth and the settlement limits. In particular the policy could consider the requirements for: affordable and specialist housing needs; rural land uses and employment opportunities and tourism and community infrastructure.
 - b. Integrate wider sustainability considerations and reference need for any development that does take place to be sustainable.
 - c. Mention any major barrier/ boundary features that should not be crossed – eg Preston not extending beyond M55, M6 and Preston Western Distributor Road.
2. It is recommended that the Councils' Area of Separation Policies (EN4, BNE4, G5) are consolidated and refined as follows:
 - a. Areas of separation in Green Belt removed, noting that national Green Belt policy adequately protects the open countryside in these locations.
 - b. Use LUC's settlement gap assessments to refine the extent of existing and designate new Areas of Separation in sensitive settlement gaps outside the Green Belt.
 - c. Each Area of Separation should be listed in the consolidated policy and their broad extent mapped in the accompanying policies map.
 - d. Each Area of Separation designation could list the key elements that contribute to the maintenance of the gap that are in need of protection (see LUC's settlement gap assessments), rather than being prohibitive of any development the falls within a defined gap (so gaps can be drawn quite broadly).
3. It is recommended that the Councils replace the only existing policy that makes reference to settlement setting, G4, with a new Settlement Setting Policy.
 - a. A criteria-based policy is recommended in preference to the definition of boundaries around specific settlements identified as having high-value settings. Development proposals would need to consider the key elements and areas that contribute to a settlement's setting (see LUC's settlement setting assessments).
 - b. Policy could refer to LUC study to identify any sensitivities to be considered in association with any settlement. Attentively, this could refer to more detailed landscape sensitivity assessments (if these are carried out).
4. It is recommended that the Councils consolidate and expand upon the existing Landscape Policies (CS13, CS21) with:
 - a. A criteria-based policy which makes it clear how landscape qualities should be considered in relation to new development – referring back to the LUC landscape value assessments for each LCA or sub-area or, if they are carried out, more detailed landscape sensitivity assessments.

- b. The Councils could also use LUC's landscape value assessments to designate areas of local landscape importance – ie areas of 'above ordinary value' such as within the Ribble Valley, Ribble Marshes and West Pennine Moors (as identified in the LUC landscape study). Each protected landscape could be listed in the policy and their broad extent mapped in the accompanying policies map. However, each designation could list the key elements that need protection (see LUC's landscape value assessments), rather than being prohibitive of any development the falls within sensitive landscapes. Depending on the likelihood of development demand in these areas, it may be felt that a criteria-based policy approach alone would be adequate and that a local landscape designation is not needed as they are already largely designated. For example, the West Pennine Moors and Ribble Marshes are already nearly entirely covered by SSSI, SPA/ Ramsar designations. The Lower Ribble Valley includes significant areas of Flood Zone 3b, although this does not cover the entirety of the area identified as of 'above ordinary value' in the LUC Landscape Study.
5. It is recommended that the Councils rationalise the Preston urban open space policy (E5) once development site options within urban areas have been thoroughly explored and preferred allocations have been identified to maximise development within urban areas in the Plan period. Once this exercise is complete, the remaining large open spaces could be protected from development. Consideration could also be given to promoting these locations for enhancement, encouraging access and investing in tree planting, leisure and recreation activities in close proximity to urban areas.