

**KEY ISSUE TWO: PUBLICLY ACCESSIBLE OPEN SPACE  
EXPLANATION OF NEIGHBOURHOOD PLAN PROVISIONS**

***Policy DM19 of the Maidstone Borough Local Plan sets standards for the provision of publicly accessible open space throughout the borough. Although this is not a strategic policy, the neighbourhood plan should demonstrate how it has had regard to Policy DM19 and how the public open space levels across all of the Strategic Housing Delivery Sites have been determined.***

The provisions for publicly accessible open space are set out in the Strategic Housing Delivery Site Policies. These provisions are derived from Maidstone Borough Local Plan (October 2017) Policy DM19. Policy DM19 sets out open space standards which the Council will seek to deliver as follows:

OPEN SPACE TYPE	STANDARD (ha/1000 population)	AMOUNT REQUIRED (ha)
Amenity green space	0.7	1.6
Outdoor plan for children and young people	0.25	0.6
Publicly accessible outdoor sports	1.6	3.8
Allotments and community gardens	0.2	0.5
Natural/semi-natural open space	6.5	15.5
<b><u>TOTAL</u></b>		<b><u>22.0</u></b>

The average household size used in the Plan and in the above table is 2.38 persons per dwelling. The provision of 1000 dwellings is therefore assumed to generate an additional population of 2,380. This is an average household size based on the average size of all the dwellings, to be provided in the Plan, including affordable housing. The theoretical total open space requirement derived from Policy DM19 is 22 hectares.

Based on its knowledge of Lenham, the Parish Council assumed that the levels of open space currently provided within the Parish were adequate to meet local needs. It was also assumed that when the 364 committed sites (see the Plan paragraph 11.1.4, page 30) were built and occupied the levels of new open space provided would equally result in a balance of provision.

The Parish Council was also aware that to ask the promoters of development sites to provide additional open space beyond the needs generated by the development itself might be regarded as not directly related to the needs arising from the development. Such a requirement might not therefore meet the tests for planning obligations that they should be limited only to requirements directly related to the needs generated by development proposals.

The levels of provision made within the Strategic Housing Delivery Sites were arrived at in discussion with the landowners/developers and taking into account the criteria set out in Policy DM19 and the supporting text.

A key consideration has been that because of the existence of significant areas of publicly accessible natural and semi-natural open space around Lenham village it was not necessary to meet the theoretical quantitative requirement for this typology in full in the Plan.

To meet the implied policy requirement of DM19 in full would have required the provision of 15.5 hectares of natural and semi-natural open space.

The Parish Council also had regard to Policy DM19(2)(ii) which allows for a reduction in the provision of open space on site in certain specified circumstances. The Parish Council considers that the distribution of open spaces shown in the Plan is appropriate having regard to Policy DM19 and the local circumstances of Lenham.

In determining open space requirements, the Parish Council was aware of the minimum size of facility specified in Policy DM19 (1)(i). The Parish Council was aware of the minimum size for a play area which is given in Policy DM19 as 0.25ha excluding a buffer zone. Based on its experience of children's play areas in Lenham, the Parish Council wished the Plan to make full provision for children's play areas within the scope of Policy DM19 including the stated minimum size of the facility.

Site 1 is to provide a play area of approximately 0.25ha. Sites 2, 4 and 5 are to provide 0.5ha of play area and public open amenity space. It is envisaged that part of this latter area could form a buffer for the play area as envisaged in DM19. Site 3 similarly provides a play area of 0.25ha and 0.25ha of amenity green space.

The South West of Lenham Village Extension (SHD Sites 2, 3 and 4) is well served by Kiln Wood which lies to the south and is well served by an existing public footpath.

Sites 2 and 3 are expected to provide a buffer of open space to the south. This is in accord with biodiversity objectives as described in paragraph 6.92 of MBLP (October 2017).

Site 5 is to provide a landscape wildlife corridor to the west of the site partly to respect the biodiversity value of Dickley Wood.

The Open space provision made in the Plan is as shown on Figure 6 (page 20) of the Lenham Masterplanning Report.

The Plan assumes a degree of flexibility between children's play and amenity green space. It is assumed that the amenity green spaces could form part of the buffer zone referred to in Policy DM19 1(i). The total provision in the Plan for children's play and amenity green space combined is 2.5 hectares. This may be compared to the combined theoretical requirement for these two typologies of amenity green space 1.6 hectares and outdoor play 0.6 hectares, a total of 2.2 hectares. Any marginal overprovision is considered acceptable, bearing in mind the Parish Council's preference to make full provision of space for children and young people.

The theoretical requirement for natural and semi-natural areas of open space is 15.5 hectares. Provision is made for 9.362 hectares within this typology. This is regarded as acceptable bearing in mind the ability for residents of the South West of Lenham Village Extension to access Kiln Wood via the public footpath.

The requirement for publicly accessible outdoor sports to serve the 1000 dwellings is 3.8 ha. The standard of 1.6 ha per 1000 population is the same as the Sports England standard in this regard. There is also a requirement to replace William Pitt Field (1.733 hectares). The total requirement in this typology is therefore 5.533 hectares.

Provision for outdoor sports is made as follows:

Site 1	3.633
Site 3	1.050
Site 5	1.050
<u>TOTAL</u>	<u>5.733</u>

There is therefore a marginal overprovision in this typology. This overprovision is considered acceptable across the Plan, bearing in mind the under-provision which is occurring in natural and semi-natural open space.

It is to be noted that the areas of outdoor sports are spread across 3 sites. One area of outdoor sport is provided in each of the 3 broad areas of Village Extension proposed in the Plan. This is considered to be an appropriate distribution to allow the sports areas to serve the area of new population in the Plan. The Plan does not have to specify the type of sport

to be played in each of these areas, nor indeed does it have to specify the layout of the pitches at this stage. This level of detail could be regarded as over-specific and be left to be determined at planning application stage.

The Lenham Masterplanning Report is dated 21<sup>st</sup> October 2019. As such, it pre-dates the Regulation 16 Consultation Submission Version which is dated November 2019. Indeed, much of the work in the Masterplanning Report is based on the September 2018 Regulation 14 Consultation Draft Plan which was the only finalised Plan available at the time when the Masterplanning Report was prepared. The Masterplanning Report makes reference to Policy GS2 for open space at the table on page 12, for example. Policy GS2 has been superceded by the publication of the November 2019 Submission Plan which now relies on the standards set in MBLP Policy DM19. It should be noted therefore that pages 14 to 19 of the Masterplanning Report have largely been superceded by the publication of the November 2019 Submission Version of the Plan.

Figure 6 (page 20) in the Masterplanning Report does, however, contain an accurate description of the open space provision made in the November 2019 Submission Draft Plan.

The Masterplan for Site 1 gives an indicative layout and distribution of open spaces. The Masterplan shows a layout for sports pitches within the area of Outdoor Sports. The layout of the sports pitches should be regarded as indicative at this stage and may vary depending on whether it is considered appropriate and possible to secure a footpath diversion at the more detailed design stage.

The Masterplan for Site 1 also shows housing close to the northern boundary. This boundary is also indicative at this stage. It may be possible to adjust the depth of the landscape buffer shown to the south-west of the housing to allow for a slightly reduced buffer to the south-west and slightly increased buffer to the north.

The Masterplan also shows two points of access to the Old Ashford Road to the north. This would be subject to approval by the Highway and Planning Authorities and may need to be reconsidered at the more detailed design stage.