

Gedling Local Planning Document (Part 2 Local Plan): Examination

Hearing Position Statement in relation to
Matter 4: Green Belt

Submitted on behalf of Northern Trust
Company Ltd (Representor Number:
9151009) in respect of Land at Flatts Lane,
Calverton

January 2017

Issue 4b: Removal of land from the Green Belt

Q2. Has the principle of removing land from the Green Belt already been established in the ACS? If so, does the Plan deviate from the principles set out in the ACS in this regard?

- 1.1 The Greater Nottingham Aligned Core Strategy (ACS) clearly establishes the principle of reviewing the boundaries of the Nottingham Derby Green Belt to inform the Part 2 Local Plans.
- 1.2 The boundaries of the Nottingham Derby Green Belt were first established through the Nottinghamshire Green Belt Local Plan in 1989 and have been subject to limited change over the last three decades. Existing Green Belt boundaries are drawn very tightly around the built-up areas, as identified in the ACS (Paragraph 3.3.1). As a result, there is limited scope for new housing delivery on sites beyond the Green Belt.
- 1.3 Whilst Policy 3 of the ACS seeks to retain the principle of the Nottingham Derby Green Belt, it also confirms that existing boundaries will be reviewed as part of 'Part 2 Local Plans' to ensure that the "*other development land requirements*" of the ACS can be met; particularly in respect of the strategic locations and the Key Settlements (such as Calverton) named in Policy 2.
- 1.4 Such an approach was informed by the evidence prepared by the Councils at that time, which demonstrated that there was insufficient land available within the existing urban area to meet identified development needs. As a result, the Examination in Public (EiP) Inspector to the ACS concluded that:

"In order to meet the housing requirement of 30,550 new homes and achieve sustainable growth with supporting infrastructure, jobs and services, I accept the Councils' judgment that future development will have to extend beyond Nottingham's main built up area..."

The Green Belt boundaries are drawn tightly around Nottingham, and to promote development beyond the Green Belt's outer edge would extend travel to work and for other purposes in an unsustainable fashion. Areas of safeguarded land exist in Gedling Borough, but these are unlikely to meet all the plan area's development requirements outside the main built up area. I agree with the Councils that the exceptional circumstances required for alterations to Green Belt boundaries exist."¹

- 1.5 As a result, the principle of removing land from the Green Belt has already been established in the ACS.
- 1.6 The approach that GBC has adopted when reviewing Green Belt boundaries is consistent with that set out within the Green Belt Background Paper prepared for the

¹ Paragraphs 110-111, Report on the Examination of the Greater Nottingham – Broxtowe Borough, Gedling Borough and Nottingham City – Aligned Core Strategies: Part 1 of the Local Plan (24 July 2014) [LPD/POL/07]

ACS²; which involved a strategic review as part of the ACS and a more detailed assessment in the LPD. The borough-level Green Belt Assessment that has been undertaken by GBC to inform the LPD³ is consistent with those being undertaken by adjoining authorities, as described in the Greater Nottingham and Ashfield Green Belt Assessment Framework⁴.

- 1.7 Gedling Borough Council's (GBC) approach to site selection within the Local Planning Document (LPD) is broadly consistent with the principles set out at Policy 3 of the ACS. In particular, GBC has sought to adopt a sequential approach to guide site selection, which favours land within the main built up area of Nottingham, Key Settlements for growth and other villages before other non-Green Belt (i.e. safeguarded land) and Green Belt land adjacent to existing settlement boundaries.
- 1.8 GBC has also given consideration to the principles set out at part 3 of Policy 3 when reviewing Green Belt boundaries. In particular, the Green Belt Assessment has given consideration to the statutory purposes of including land within the Green Belt and the achievement of retaining or creating defensible boundaries.
- 1.9 However, Northern Trust maintains that the Green Belt Assessment undertaken (and consequently the LPD) will fail to establish a permanent boundary which allows for development in line with the settlement hierarchy and / or to meet local needs or gives sufficient consideration to the appropriateness of defining safeguarded land to allow for longer term development needs. These points are discussed further in our response to Issue 4c below.

Q3. Have exceptional circumstances been demonstrated to enable the removal of land from the Green Belt in order that it be designated as Safeguarded Land in the Plan? [Policy LPD 16]

- 1.10 Gedling Borough Council (GBC) has provided sufficient evidence to demonstrate that 'exceptional circumstances' exist to enable the removal of land from the Green Belt in order for it to be designated as Safeguarded Land.
- 1.11 As highlighted in our response to Q2 above, the Inspector examining the ACS concluded that the 'exceptional circumstances' required for alterations to Green Belt boundaries had been demonstrated at the strategic level. As a result, Policy 3 of the ACS makes provision for more detailed reviews of Green Belt boundaries to be undertaken to inform Part 2 Local Plans.
- 1.12 More recent evidence undertaken by GBC continues to demonstrate that there is insufficient land available within the existing built-up area to meet the housing requirement set out at Policy 2 of the ACS. In the circumstances, Northern Trust maintains that 'exceptional circumstances' have been demonstrated to enable the removal of land from the Green Belt.

² Green Belt Review Background Paper (Broxtowe Borough Council, Gedling Borough Council and Nottingham City Council, June 2013)

³ Green Belt Assessment (Gedling Borough Council, July 2015) [LPD/GRE/02]

⁴ Greater Nottingham and Ashfield Green Belt Assessment Framework (Ashfield District Council, Nottingham City Council, Gedling Borough Council and Broxtowe Borough Council, February 2015) [LPD/GRE/01]

- 1.13 The principle of identifying Safeguarded Land within Local Plans is supported by national planning policy which encourages local planning authorities (LPAs) to have regard to the intended permanence of Green Belt boundaries in the long term, so that they are capable of enduring beyond the plan period” (Paragraph 83).
- 1.14 LPAs should also “*satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period*” and, where necessary, “*identify in their plans areas of ‘safeguarded land’ between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period*” (Paragraph 85).
- 1.15 Northern Trust agrees with GBC that the allocation of Safeguarded Land in Gedling Borough is necessary in order to, *inter alia*, provide a degree of permanence to the Green Belt boundaries and minimise the need for future reviews and to provide flexibility and allow for the non-delivery of allocated sites to be addressed without a fundamental review of the Local Plan⁵.
- 1.16 Northern Trust also agrees that there is insufficient land available within the existing urban area to enable development needs to be met.
- 1.17 As a result, the ‘exceptional circumstances’ required to enable the removal of land from the Green Belt, and the designation of Safeguarded Land, have been demonstrated.

⁵ Paragraph 2.2, Safeguarded Land (Gedling Borough Council, March 2016)
[LPD/GRE/04]

Issue 4c: Safeguarded Land

Q4. Should Safeguarded Land be allocated in the Plan? If so, has sufficient Safeguarded Land been allocated?

- 1.18 It is appropriate for the LPD to allocate Safeguarded Land in order to ensure that longer-term development needs beyond the plan period can be met. Such an approach is consistent with Paragraph 85 of the Framework and seeks to provide confidence that Green Belt boundaries will not need to be altered at the end of the development plan period.

Q8. Is the allocation of Safeguarded Land at Calverton appropriate? [Policy LPD 16]

- 1.19 The allocation of Safeguarded Land at Calverton is appropriate, if it is not to be allocated for development within the plan period.
- 1.20 Calverton is identified as a Key Settlement for Growth in the ACS alongside Bestwood Village and Ravenshead, reflecting its existing sustainability and ability to accommodate additional homes⁶. Indeed, the ACS acknowledges that “*Calverton has a good range of facilities compared to other similar sized settlement*”⁷. As a result, the majority (54%) of the 1,945 new homes required within the Key Settlements in the ACS is proposed to be located within Calverton (i.e. 1,055 dwellings).
- 1.21 GBC has demonstrated that Calverton is a sustainable location for housing growth over the plan period. However, as the existing Green Belt boundaries are drawn very tightly around the settlement, it is appropriate to consider the ability of Calverton to meet future development needs beyond this plan period (i.e. post-2028) whilst Green Belt boundaries are being reviewed. Such an approach is justified and appropriate and consistent with national policy (see response to Q4 above).
- 1.22 The LPD proposes to allocate c. 30.7 hectares of land to the north west of the existing settlement as Safeguarded Land (referred to as Land at Oxton Road / Flatts Lane). That proposed allocation includes land that is being promoted for development by Northern Trust.
- 1.23 Northern Trust agrees with GBC that the release of the Oxton Road / Flatts Lane site from the Green Belt is an appropriate and justified approach, which is consistent with numerous evidence base documents⁸. In particular, the Green Belt Assessment concluded that Green Belt land to the south and south east of Calverton is the most valuable, as it helps to protect the setting of the Calverton Conservation Area and maintain the ‘gap’ to Woodborough.

⁶ Paragraph 3.9, Housing Background Paper (Gedling Borough Council, May 2016) [LPD/BACK/01]

⁷ Paragraph 5.2, Local Planning Document Publication Draft (Part 2 Local Plan) (Gedling Borough Council, May 2016) [LPD/REG/02]

⁸ Including the Green Belt Assessment (Gedling Borough Council, July 2015) [LPD/GRE/02] and the Site Selection Document (Gedling Borough Council, May 2016) [LPD/GRO/05]

- 1.24 By contrast, areas of the Green Belt to the west of the settlement (including north west and south west) is *“less valuable as it is further from the Conservation Area and includes a significant amount of encroachment (associated with the former Calverton Colliery site)”*⁹.
- 1.25 Furthermore, the site has strong defensible boundaries and good connections with the existing settlement and its development would not result in any material reduction in a gap to another settlement. It also makes a minimal contribution to the five purposes of including land within the Green Belt, as set out within our previous representations.

Q10. Is it appropriate that some Safeguarded Land is protected from development as it is not suitable and/or available for development as suggested in proposed MM9? [Policy LPD 16]

- 1.26 The proposed modification to Policy LPD16 (MM9) is helpful in terms of clarifying the meaning and intention of the policy. However, further amendments are required to provide sufficient flexibility to enable areas of Safeguarded Land to come forward for development in the eventuality that the allocated sites do not come forward as anticipated and / or housing needs fail to be met. Such an approach would remain consistent with the objective of protecting Safeguarded Land to meet long-term development needs, whilst also ensuring that development needs within the current plan period can be met.
- 1.27 As currently drafted, the detailed wording of Policy LPD16 is inconsistent with the dual aims of Safeguarded Land identified by GBC (i.e. to meet long-term development needs and to provide ‘reserve sites’ that can be brought forward for development prior to 2028 should allocated sites fail to deliver).

⁹ Paragraph 5.7, Green Belt Assessment (Gedling Borough Council, July 2015) [LPD/GRE/02]

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