



Position
Statement

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Gedling Local Planning Document Examination

Position Statement on behalf of
Northern Trust Limited

Ref. 9151009
Matter 4: Green Belt

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Issue 4b: Removal of land from the Green Belt

Question 2 – Has the principle of removing land from the Green Belt already been established in the ACS?

- 1.1 Paragraph 111 of the Inspector's Report in to the examination of the ACS confirms her agreement that it was unlikely that the development requirements of the areas could be accommodated on areas of safeguarded land in Gedling and that 'exceptional circumstances' existed for the alteration of green belt boundaries. The Inspector confirms that this was on the basis that the Green Belt boundaries are drawn tightly around Nottingham and to promote development beyond the Green Belt's outer edge would be considered unsustainable.
- 1.2 Paragraph 3.2.10 of the supporting text to Policy 3 of the ACS also acknowledges the need for the release of land in the Green Belt to meet development needs.
- 1.3 Policy 3 of the ACS, which relates specifically to the Green Belt, confirms that whilst the principle of the Nottingham Derby Green Belt will be retained the Part 2 Local Plans for each authority will review Green Belt boundaries to meet the development land requirements of the ACS.
- 1.4 Therefore, the principle of removing land from the Green Belt is clearly established in the ACS.
- 1.5 Part 2 of Policy 3 states that, in reviewing the Green Belt boundaries to deliver the distribution of development in Policy 2, Part 2 Local Plans will use a sequential approach to guide site selection, as follows:
 - a. Firstly, land within the development boundaries of the main built up area of Nottingham, Key Settlements for growth, and other villages.
 - b. Secondly, other land not within the Green Belt (safeguarded land).
 - c. Thirdly, Green Belt land adjacent to the development boundaries of the main built up area of Nottingham, Key Settlements for growth, and other villages.
- 1.6 Part 3 of Policy 3 confirms that in reviewing Green Belt boundaries, consideration will be given to:
 - a. the statutory purposes of the Green Belt, in particular the need to maintain the openness and prevent coalescence between Nottingham, Derby and the other surrounding settlements;

- b. establishing a permanent boundary which allows for development in line with the settlement hierarchy and / or to meet local needs;
 - c. the appropriateness of defining safeguarded land to allow for longer term development needs; and
 - d. retaining or creating defensible boundaries.
- 1.7 This provides a considered framework for the release of land from the Green Belt to meet the Borough's development needs.

If so, does the Plan deviate from the principles set out in the ACS in this regard?

The Sequential Approach to Site Selection

- 1.8 As set out above, the ACS establishes a sequential approach to guide site selection and the review of Green Belt boundaries. This was supported by the Inspector during the examination of the ACS¹. The Inspector confirmed that non-Green Belt sites have first preference and that *"sites to be released from the Green Belt must have good sustainability credentials."*
- 1.9 In reviewing the Green Belt boundaries, adjoining the urban area, the Council has followed the sequential approach established by the ACS. This is recognised in the Council's Site Selection Document (May 2016) which confirms that, in accordance with Part 2 of Policy 3 of the ACS, preference was given to sites which are not located in the Green Belt.
- 1.10 Appendix A to the Council's Site Selection Document (May 2016), which relates to the assessment of reasonable alternatives in or adjoining the urban area, also confirms that the scale of development anticipated in the ACS (and any higher figure in the urban area) cannot be accommodated without Green Belt release. It notes that there are a number of 'non-Green Belt' sites in the urban area which will be allocated, where possible.
- 1.11 It only discounts reasonable alternative non-Green Belt sites in the development boundary of the main urban area, where:
- sites are below the 50 dwelling threshold established for allocation;
 - there is a lack of or uncertainty regarding availability for housing; and/or
 - sites are considered unsuitable due to a range of existing physical and policy constraints (e.g. heritage, flooding and loss of open space or employment land).

¹ Paragraph 118 of the Inspector's Report On The Aligned Core Strategies

1.12 It also considers the allocation of safeguarded land and only discounts safeguarded land in or adjoining the main urban area where sites:

- would not form a logical extension to the urban area or other settlements (i.e. are isolated and considered unsustainable);
- are considered unsuitable due to a range of existing physical and policy constraints (e.g. inadequate access, ecology and loss of open space or employment land); and/or
- are considered unavailable.

1.13 On the basis that insufficient non-Green Belt sites were identified as suitable for allocation in or adjoining the urban area a number of 'other reasonable alternative' sites in the Green Belt, adjoining the urban area, were considered for removal from the green belt and allocation for residential development.

Approach to Reviewing Green Belt Boundaries

1.14 In assessing and considering the relative merits of the reasonable alternative Green Belt sites in and adjoining the urban area, the Council had regard to each of the factors, identified for consideration by the ACS Policy 3, Part 3.

1.15 Therefore, the approach taken to removing land from the Green Belt, in the area adjoining the main urban area, in the LPD does not deviate from the principles set out in the ACS.

Linden Grove site (H4)

1.16 In proposing to release the Linden Grove site (H4) from the Green Belt, for residential development, the Council followed the sequential approach to site selection required by the ACS. In doing so, the Council also took into account the need to promote sustainable patterns of development in accordance with national policy², recognising that the site abuts and provides a logical extension to the urban area (immediately to the south and west), in the preferred location for growth and housing development in the Borough.

1.17 In selecting the Linden Grove site for release from the Green Belt the Council also had regard to the relevant considerations set out at Part 3 of Policy 3 of the ACS. Indeed the Site Selection Document (May 2016) confirms that the site:

- is bounded by the Colwick Loop Road and does not make a significant contribution to the purposes of the Green Belt;

² Paragraph 84 of the NPPF.

- scores 9/20 (joint 3rd lowest) in the Council's Green Belt Assessment (May 2016) in terms of its performance against the five purposes of the Green Belt;
- has strong defensible boundaries due to the A612 Colwick Loop Road;
- the site is not considered 'open countryside' and there would only be limited encroachment; and
- the site forms part of the wider setting of the listed Gedling House but its development would not impact on the historic character of a settlement.

1.18 Therefore, the approach taken to removing land from the Green Belt, in respect of the Linden Grove site (H4) specifically does not deviate from the principles set out in the ACS.

1.19 Further information in respect of the 'exceptional circumstances' for the release of the Linden Grove site (H4) from the Green Belt can be found in the Hearing Position Statement submitted in respect of **Matter 7: Issue 7c**.

GVA on behalf of Northern Trust