

# **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 Orchard  
Close, Burton Joyce

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."<sup>1</sup>*

- 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

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<sup>1</sup> 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]

ACS<sup>2</sup>; 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 LPD<sup>3</sup> is consistent with those being undertaken by adjoining authorities, as described in the Greater Nottingham and Ashfield Green Belt Assessment Framework<sup>4</sup>.

- 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.

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

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

<sup>4</sup> 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 Plan<sup>5</sup>.
- 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.

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<sup>5</sup> 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.
- 1.19 However, Northern Trust maintains that an insufficient quantum of Safeguarded Land is proposed to be allocated within the LPD. In particular, Safeguarded Land to meet longer term development needs is only identified in three locations: at Top Wighay Farm, Hucknall; Oxtan Road / Flatts Lane, Calverton and Moor Road, Bestwood Village. Locating all of the Safeguarded Land in the Borough on just three sites is likely to compromise the opportunities for future needs within other parts of the Borough to be met.
- 1.20 In particular, no Safeguarded Land within the remaining Key Settlement for Growth (Ravenshead) or any of the Other Villages is proposed. This approach fails to recognise that housing needs in these locations will continue beyond the LPD plan period.
- 1.21 Allocating further Safeguarded Land would provide additional flexibility to ensure that minimum housing requirements can be met over the plan period, and provide sufficient confidence that Green Belt boundaries will not need to be reviewed again at the end of this plan period.
- 1.22 Northern Trust is promoting land at Orchard Close in Burton Joyce. The first phase of that site is proposed to be allocated for housing development in the LPD (ref. H21). Further land to the north and west is also available for housing development within the plan period of the LPD. However, as a minimum, it should be regarded as appropriate for designation as Safeguarded Land as a reflection of long term needs, and removed from the Green Belt. Further detail is provided in our Hearing Position Statement in relation to Matter 9.

### **Q5. What evidence is there to support the quantum of Safeguarded Land allocated in the Plan? [Policy LPD 16]**

- 1.23 GBC has failed to provide sufficient evidence to justify the quantum of Safeguarded Land that is proposed to be allocated within the LPD. In particular, no evidence has been provided to justify not allocating Safeguarded Land beyond Hucknall, Calverton and Bestwood Village.

**Q6. Is the distribution and amount of Safeguarded Land within the Borough appropriate? [Policy LPD 16]**

- 1.24 Northern Trust agrees that the principle of identifying areas of Safeguarded Land within the LPD is a sound approach. However, the distribution and amount of Safeguarded Land proposed will fail to ensure that the revised Green Belt boundaries have permanency beyond 2028.
- 1.25 In particular, the LPD only identifies areas of new Safeguarded Land to meet longer-term development needs at Hucknall, Calverton and Bestwood Village. No allowance for land to be safeguarded around the other Key Settlement for Growth (Ravenshead) or the Other Villages has been made. Such an approach is inconsistent and fails to acknowledge that needs within other areas of the Borough will continue to arise beyond 2028. As the Green Belt boundaries around those settlements are to remain tightly drawn, there is a risk that boundaries may need to be reviewed at the next Local Plan review, contrary to national planning policy.
- 1.26 Northern Trust maintains that further Safeguarded Land should be identified within the LPD, particularly within Ravenshead, Burton Joyce and Woodborough, as the remaining Key Settlement and the most sustainable 'Other Villages'.
- 1.27 Northern Trust considers that additional land at Orchard Close in Burton Joyce should be allocated for housing development in the LPD (see previous representations to Policy LPD68<sup>6</sup>). It has been demonstrated in previous representations that the site is suitable, available and deliverable in the short to medium term and is required to meet identified local needs in the settlement. However, as a minimum, it should be regarded as appropriate for designation as Safeguarded Land, as a reflection of long-term needs, and removed from the Green Belt.

**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]**

- 1.28 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.
- 1.29 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).

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<sup>6</sup> Comment ID: lpd\_pub\_b/207

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