

Independent Examination of the Gedling Local Plan Planning Document (Part 2 Local Plan)

Matter 4: Green Belt

Issue 4a Protection of the Green Belt (Question 1)

We have no comments to make on Policies LPD12-LPD 17, with the exception of Policy LPD16 Safeguarded Land (refer comments on 4c below)

Issue 4b Removal of land from the Green Belt (Questions 2 and 3)

The need to alter Green Belt boundaries can be traced back to the East Midland Regional Plan (now abolished) and also the ACS which concluded that the housing requirements can not be met from the reuse of previously used land in the built up areas. This conclusion has been reinforced by the SHLAA and also by migration trends which show out-migration from the built up area of Nottingham to towns and other settlements beyond the Green Belt. This trend is leading to increasing commuting distances and is resulting in an unsustainable pattern of development.

Over the years the authorities in South Nottinghamshire have commissioned a number of studies to underpin any amendments to Green Belt boundaries. The Green Belt Review (2006) identified the most important areas of Green belt (generally between Nottingham and Derby in Broxtowe Borough) and the least important areas of Green Belt having regard to the five purposes of the Green Belt (these included areas in Gedling to the north and east of the City) and also Rushcliffe (to the south). Subsequently the Appraisal of Sustainable Urban Extensions (2008) and Sustainable Locations for Growth Report (2010) assessed possible directions and locations for growth and looked at the implications for Green Belt policy, among other things. Subsequently the Borough Council has undertaken its own assessment to determine allocation sites and where boundaries should be amended. Taken together the results of these studies undertaken over an 10 year period provide a solid evidence base and have influenced the selection of allocation sites in Gedling, although there appear to be some notable exceptions, particular having regard to sites on the edge of the built up area of Nottingham.

Thus I am satisfied that the principle of removing land from the Green Belt has been met, and that the preparation of the Local Plan represents an appropriate mechanism for making amendments to the Green Belt.

Having regard to whether exceptional circumstances have been demonstrated to enable the removal of land from the Green Belt for it to be designated as Safeguarded Land in the Plan, I consider that such circumstances exist in Gedling, as follows:

- There will continue to be a high demand for new homes in Gedling having regard to demographic changes, the economic performance of the conurbation, and the need to ensure a sustainable pattern of development – following the decline of the coal industry and other traditional industries, Gedling has become a commuter area for those working in other parts of the conurbation;
- The SHLAA (and Urban Capacity Studies) shows that there is only limited capacity for housing on previously development/non-Green Belt sites within the built up area of Gedling without impacting on the quality of life in the urban area having regard to traffic, air quality, loss of open space, densification by building on gardens, further loss of employment sites etc.

- Most sites coming forward for development in the urban area are for less than 10 dwellings and do not meet the threshold for the provision of affordable housing;
- The need to ensure that Green Belt boundaries do not need to be altered at the end of the plan period (2028 is only 11 years away);
- Uncertainties and risks associated with developing some of the allocated sites, and the likelihood that some sites may not achieve their planned allocation target;
- Beyond the built up area boundary and the boundaries of Key Settlements, rural Gedling is entirely in the Green Belt – thus there is no alternative course of action for meeting the Borough’s development needs except through making amendments to the Green Belt boundary in the Local Plan.

Issue 4c Safeguarded Land (Questions 4-10)

I will rely primarily on the submission I made on Policy LPD 16 at the public consultation stage on the Submission Draft Local Plan Document.

In summary:

- Q4 – Yes, Safeguarded Land should be allocated. Indeed the NPPF at para 85 specifically requires ‘Safeguarded Land’ between the urban area and Green Belt to be identified;
- Q5 – The Plan does not contain any evidence to justify the amount of Safeguarded Land it has allocated. Whilst there are no guidelines in the NPPF regarding the amount of Safeguarded Land to allocate, a rule of thumb used at previous examinations has been to ensure a minimum of an additional 5 years supply is allocated as Safeguarded Land (for Gedling this would be $7250/17*5=2,132$ dwellings, equivalent to between 71 ha and 85 ha assuming average densities of 25-30 per ha on the net developable area). Whilst the LPD16 identifies 3 sites as Safeguarded Land with a total area of 85 ha (at the top end of the range), it appears that large parts of the Safeguarded Land at Calverton are not developable, and it is unlikely that all the land at Top Wighay Farm is developable.
- Q6 – The distribution of Safeguarded Land within the Borough is inappropriate as it does not satisfy the requirements of the NPPF (which states that safeguarded land should be between the urban area and the Green Belt, and also Policy 2 Spatial Strategy of the ACS which states that most development will be located in or adjoining the main built up area of Nottingham. None of the three Safeguarded Land sites meet this criteria. As a minimum requirement I would suggest that the distribution of safeguarded land ought to follow the overall distribution of development in the Local Plan with at least 60% on land adjoining the built up area and up to 40% at Key Settlements/Adjoining Hucknall.
- Q7 – In my opinion the allocation of Safeguarded Land at Bestwood Village is appropriate, assuming it is not required for development during the plan period. Of all the locations for new development beyond the edge of the built up area (including at Key Settlements and also at Top Wighay which is north of Hucknall), Bestwood is the most sustainable location for further development having regard to its proximity to Nottingham, its location along a multi-modal transport corridor, and the benefits which housing development can bring to ensure the regeneration of Bestwood.

- Q8 – I consider that the allocation of such a large area of land at Calverton as Safeguarded Land is inappropriate, particularly as large parts are unsuitable for development, and also because it can only be developed after the Park Road allocation has been built out. We have concerns that this allocation may not be fully developed during the plan period, and this may prevent this Safeguarded Land from coming forward for development.

- Q9 - I consider that the allocation of such a large area of land at Top Wighay as Safeguarded Land is inappropriate, particularly as there is still lots of uncertainty and risk surrounding the bringing forward of the Top Wighay allocation for development, despite reassurances from Gedling Borough Council and the County Council (3 years ago at the time of the Public Examination of the ACS).

- Q10 – There appears to be no requirement in the NPPF to identify Safeguarded Land which is protected from development and/or is not suitable and/or available for development.