

POSITION STATEMENT ON GREY BELT

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Introduction

1. The new NPPF published in December 2024 introduced the concept of grey belt. *“For the purposes of plan-making and decision-making, ‘Grey Belt’ is defined as land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143. ‘Grey Belt’ excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development”*
2. Updated Green Belt Planning Practice Guidance published on 27th February 2025 sets out
 - The considerations involved in assessing the contribution Green Belt land makes to Green Belt purposes, where relevant to identifying grey belt land;
 - The considerations involved in determining whether future release or development of Green Belt land would fundamentally undermine the remaining Green Belt in the plan area;
 - Guidance for considering proposals on potential grey belt land;
 - Guidance on identifying sustainable locations when considering the release or development of Green Belt land;
 - Updated guidance on how major housing development on land which is released from the Green Belt through plan making, or on sites in the Green Belt, should contribute to accessible green space;
 - Updated guidance on how to consider the potential impact of development on the openness of the Green Belt.
3. Ashfield, Broxtowe, Gedling, Newark and Sherwood, Nottingham City and Rushcliffe Councils are working jointly to prepare evidence to support their emerging Local Plans within their authorities. A [Green Belt Assessment Framework](#) is being prepared that will help inform part of that evidence base by providing a framework to enable each council to undertake a robust assessment of Green Belt boundaries within their area and ensure a common means of assessing the purposes of Green Belt as set out in the National Planning Policy Framework. If required, more detailed methodologies, informed by local circumstances, will be set out by each local authority in their Green Belt review documents. In particular, the Green Belt Assessment Framework will help the Councils reach a view on whether there are specific areas of land that could be considered for release from the Green Belt and also to identify grey belt.
4. At the national level, the approach to defining grey belt is anticipated to be clarified further through subsequent appeal decisions and case law. However, in the meantime, the purpose of this position statement is to set out how Gedling Borough Council will define key terms and phrases within the Green

Belt Planning Practice Guidance, in order that developers and landowners can clearly understand how these terms will be used in decision making. This position statement will be kept under review and will be updated as and when necessary.

5. This position note has been prepared by Gedling Borough Council in discussion with the other South Nottinghamshire authorities, who are considering whether they may wish to use the same definitions.

Definitions

6. The Green Belt guidance published on 27th February 2025 includes a number of terms which are important to define in order that the process of defining grey belt is clear and transparent.

Physical features

7. Physical features, as referred to in paragraph 005 of the Planning Practice Guidance on Green Belt (purpose A) comprise roads, railways, watercourses, tree belts, woodlands, ridgelines or field boundaries. This definition reflects the approach taken in the 2025 Green Belt Assessment Framework.

Large built up area

8. Large built up areas within Gedling Borough are defined as the Main Built up Area (see below) and Hucknall.

Towns

9. Towns are to be defined by each Council using the 2025 Green Belt Assessment Framework, but likely to include:-
 - The Main Built up Area (as identified in the Key Diagram in the Greater Nottingham Strategic Plan);
 - Settlements including but not restricted to Key Settlements and Named Settlements as defined in adopted and emerging local plans; and
 - Main Urban Areas (as defined in the Ashfield Local Plan).
10. For Gedling Borough Council the definition of Towns therefore includes:-
 - the Main Built up Area (i.e. Arnold and Carlton). The Main Built up Area is defined on the Key Diagram in the emerging Greater Nottingham Strategic Plan and will also be defined through the preparation of the Gedling Local Development Plan.
 - the sub regional centre of Hucknall
 - Bestwood Village
 - Burton Joyce
 - Calverton
 - Ravenshead.

11. The settlements are justified by the [Key Settlements Review \(September 2024\)](#) which recognises that Burton Joyce has a medium level accessibility to a range of services.

Historic town

12. It is considered that there are no historic towns within Gedling Borough.

Footnote 7

13. Paragraph 009 of the Planning Practice Guidance on Green Belt requires consideration to be given to whether the application of policies to areas and assets of particular importance identified in footnote 7 to the NPPF (other than Green Belt) provide a strong reason to restrict development. The areas and assets of importance listed in footnote 7 will be defined as follows

Areas/assets of importance	Definition
Sites of Special Scientific Interest	As designated by Natural England.
Local Green Space	Defined in local plans, neighbourhood plans and the Nottingham City Council Open Space Network.
Irreplaceable habitats	As defined in the glossary to the NPPF. Include ancient woodland, ancient and veteran trees. There are no blanket bogs, limestone pavements, sand dunes, salt marshes and lowland fens within Gedling Borough.
Designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 75);	Designated heritage assets defined by Historic England – includes listed buildings, scheduled monuments, registered historic parks and gardens, conservation areas. There are currently no non designated heritage assets of archaeological interest within Gedling Borough.
Areas at risk of flooding	Within flood zones 2 and 3

12. The implications of the possible potential Sherwood Forest Special Protection Areas (ppSPA) will also be considered in light of the Natural England advice note, as defined by the 400m buffer to the Natural England Indicative Bird Area. <https://www.mansfield.gov.uk/downloads/file/482/natural-england-s-advice-notes-on-the-sherwood-ppspa-2014>

Partially/largely enclosed

14. 'Partially enclosed' is defined as being enclosed on two sides and 'largely enclosed' is defined as being enclosed on three sides.

Visual separation

15. The loss of visual separation is considered in relation to whether there would be an impact on the views from the site/area being considered to the closest town, as well as on the views from the edge of the closest town to the site/area being considered.

Definition of 'adjacent or near to' and 'in reasonable proximity'

16. These two terms will both be assessed on their merits and will take account of physical features on the ground. Consideration will be given to the relationship with a large built up area and whether this is clearly visible from the site. Prominent landforms between a site and the large built up area are likely to prevent the site from being defined as 'adjacent or near to' or 'in reasonable proximity'.

Sustainable location

17. Paragraph 011 of the Planning Practice Guidance on Green Belt states that, "when making decisions regarding planning applications on grey belt land, authorities should ensure that the development would be in a sustainable location. For the purpose of these decisions, where grey belt land is not in a location that is or can be made sustainable, development on this land is inappropriate".
18. Planning Practice Guidance cross refers to paragraphs 110 and 115 the NPPF which recognises the need to minimise both the number and length of journeys needed for employment, shopping, leisure, education and other activities.
19. The adopted Gedling local plan (Aligned Core Strategy and Local Planning Document) and the emerging Greater Nottingham Strategic Plan and Gedling Local Development Plan define a settlement hierarchy to accommodate future

growth in order to achieve sustainable development. The hierarchy focuses on urban living through prioritising sites within and adjoining the main built-up area of Nottingham to make the most of existing infrastructure and reducing the need to travel.

20. For Gedling Borough Council, this results in the following hierarchy
 - In the Main Built up Area of Nottingham (i.e. Arnold and Carlton);
 - Adjoining the Main Built up Area of Nottingham (i.e. Arnold and Carlton); and
 - In or adjoining the Key Settlements of Bestwood Village, Calverton and Ravenshead.

21. The starting point for considering whether a site/area is in a sustainable location is the settlement hierarchy. Consideration will then be given to the numerical score given by the digital connectivity tool launched in July 2025 by the Department for Transport and MHCLG <https://www.gov.uk/guidance/connectivity-tool>. The tool considers Output Areas across England and Wales and provides a standard way to consider connectivity to education, leisure and community, health, shopping, residential and workplaces by four modes of transport – walking, cycling, public transport and driving.

22. Planning Practice Guidance states that whether locations are sustainable should be determined in light of local context and site or development-specific considerations. As such, it may be that for certain land uses a different definition is appropriate.