

Greater Nottingham and Ashfield Green Belt Assessment Framework

Summary of Consultation Comments



Nottingham
City Council



Broxtowe
Borough
COUNCIL

Name	Organisation	Specific Area (if blank covers whole area)	Summary	LPA Comments
National Consultation Bodies				
R Bust	Coal Authority		No specific comments - site specific assessments should include issues of mineral sterilisation & unstable land etc.	Noted
R Deeming	Natural England		Approach taken is appropriate to the aims and follows a logical methodology. Assessment should consider opportunities to link into GI & ecological networks. Landscape character could be considered when assessing value of the GB and reference should be made to the NCAs.	Noted. The issues relating to GI, ecology and landscape are not Green Belt matters, but will all be taken into account in the Councils Local Plans as part of the SA/ Landscape work.
C Searson	English Heritage		Assessment criteria in figure 1 should be amended to include " <i>both designated and non-designated heritage assets</i> " and to also include " <i>Scheduled Monuments</i> " in the list that follows. The significance of assets should also be considered as more than just a measure of distance from an asset and should relate to broad considerations and not simply visual impacts. Local conservation and archaeological expertise should be sought when undertaking assessments.	Agreed regarding the suggested additions to the text. When sites are assessed to take forward as potential allocations, more detailed conservation and archaeological expertise will be utilised at that stage.
S Chambers	Highways Agency		Welcomes overall approach which will ensure a robust assessment of GB. Agency welcomes that the assessment will seek to check unrestricted sprawl of large built-up areas which aligns with the Agency's preference for development to be concentrated in existing built-up areas with good access to public transport.	Noted
S Beard	Sport England		No comment	Noted
	Equality & Human Rights Commission		Do not have resources to respond to consultations (unless considered to raise issues of strategic importance). PSED is mechanism for LPAs to consider planning proposals on groups of different people.	Noted
A Bishop	Homes & Communities Agency		Welcomes joint approach as ensures consistency & have no specific comments to make.	Noted
Neighbouring District Councils				
H Fairfax	Bolsover District Council		No objections to the methodology.	
Councillors & Local Town/Parish Councils				
Cllr McCauley			Framework needs to consider Green Belt expansion	This could only be done in Ashfield as the other Councils have all of their rural areas in the Green Belt already. However, it is not the purpose of the Framework to consider GB expansion. Its purpose is to test existing Green Belt against the 5 purposes of Green Belt as set out in paragraph 80 of the National Planning Policy Framework.
Cllr J Booth		Brinsley (Broxtowe)	Local landscape and heritage needs to be taken into consideration, less sensitive GB sites should be released before sites surrounding Brinsley.	Heritage will be taken into account in line with the suggestions of English Heritage. Local landscape will be taken into account separately, and the Green Belt Framework will provide evidence for the least sensitive sites to be released for development wherever appropriate.

Brinsley Parish Council	Brinsley (Broxtowe)	Would prefer a more detailed site specific assessment be made at Stage 1, local knowledge should be key part of assessing worth of Green Belt. High level of subjective judgement is required in the review and gives opportunity for manipulation of methodology towards desired outcomes. Consultation not publicised widely enough.	The Green Belt assessment is a technical exercise, at this stage, undertaken by planning officers against an agreed criteria to ensure consistency across the area. The local community will be able to comment on the findings of the assessment once completed. For clarification the term 'local knowledge' will be amended to 'professional judgement'.
Trowell Parish Council	Trowell (Broxtowe)	GB should not be released for development. If GB has to be released for development the loss should be shared across the borough. Smaller developments would be more beneficial to the communities where development takes place as it allows for infrastructure to grow accordingly. Welcomes strategy to release brownfield for development.	The decision on distribution of development in broad terms has been taken in the ACS for the three councils with a Policy setting out the approach to the Green Belt. Ashfield are preparing a separate Local Plan
Woodborough Parish Council	Woodborough (Gedling)	General approach satisfactory, do not accept that GB surrounding their village requires review. Geo-environmental barriers and flooding should be included in the matrix - sites with medium risk of flooding should not be assessed further.	Woodborough is an area considered in Gedling's Part 2 Local Plan. The issues relating to Geo-environmental factors and flooding are not Green Belt matters, but will all be taken into account in the Councils Local Plans but as part of the SA/ Landscape work.
Linby Parish Council		Welcome common approach. Para 1.1 says LPAs will produce GB review docs, would like assurance that cross boundary impacts will be assessed. Require clarity regarding GB release document, is it the same doc. as GB review document or separate? Is there a mechanism for reviewing safeguarded land (with the view to return it to the GB) that is not required through the ACS for development?	Cross boundary impacts will be assessed. The Framework explains the approach to reviewing the Green Belt but decisions on sites to release and the review of safeguarded land will be considered and determined in the Council's Local Plans.
Local Interest Groups			

P Oiko	ACCESS	Ashfield	Disappointed that Ashfield is aligning itself with Broxtowe, Gedling & Nottingham rather than Newark & Sherwood & Mansfield & Ashfield, methodology bias towards GB release. GB should be extended to former position behind Forest Road Annesley Woodhouse. Noise issues related to development should be a consideration - 250m exclusion zones should be used to protect future residents from noise and allow business expansion. Natural environment aspects, mining, land slip and underground springs etc. should be incorporated into assessment methodology matrix. Access asks the councils to provide advance information on how it will engage the "local knowledge". Amend paragraph 5.5 to allow for the addition of an area for/ or from further assessment.	Joint work is consistent with all Council's Duty to co-operate. In relation to the Green Belt, it is good planning for Council's around Greater Nottingham to agree a common approach and all four councils will take their own individual decisions on Green Belt boundary changes in their Local Plans. Issues relating to green corridors, biodiversity, landscape and noise etc are not Green Belt matters but will be considered separately as part of the Local Plan process. The Green Belt assessment is a technical exercise, at this stage, undertaken by planning officers against an agreed criteria to ensure consistency across the area. The local community will be able to comment on the findings of the assessment once completed. For clarification the term 'local knowledge' will be amended to 'professional judgement'. Paragraph 5.7 of the Framework allows for the amendment of site boundaries following an on-site appraisal.
J Page	SABRHE	Brinsley (Broxtowe)	Want to ensure that the 'local knowledge' comes from the local people (review should set out who and how this will be collected - local Parish Councils are not enough) and not from the planners and councillors. Have a wildlife survey (available on request) which should inform the GB review. Review needs to define 'exceptional circumstances' - this cannot be need for more housing. Requests further details to be set out in the document to make clear what is happening, how it is being undertaken and definitions e.g. what is urban/rural.	The Green Belt assessment is a technical exercise, at this stage, undertaken by planning officers against an agreed criteria to ensure consistency across the area. The local community will be able to comment on the findings of the assessment once completed. For clarification the term 'local knowledge' will be amended to 'professional judgement'.
Developers/Landowners				
Barton Wilmore	Taylor Wimpey	East of Thoresby Avenue Kirkby-in-Ashfield (Ashfield)	Welcome fresh GB assessment framework being prepared. Site should be assessed as part of GB review and should be removed from the GB given that Derby Rd to East of site provides recognisable permanent boundary. Sustainable location, close proximity to Kirkby-in-Ashfield and forms part of urban area.	Noted and decisions on Green Belt boundary change will be taken later in Local Plans.
Barton Wilmore	Taylor Wimpey	South of Forest Road Annesley Woodhouse (Ashfield)	Welcome fresh GB assessment framework being prepared. Promoting specific site. 2002 LP considered site should not be included with the GB and no changes have taken place that would mean that the site should now be considered as positively contributing to the 5 purposes of the GB. ADC accept site as within urban area. Site should not be considered as part of the GB assessment.	Noted and decisions on Green Belt boundary change will be taken later in Local Plans.
I Glenn		Land adjacent to Watnall Road Hucknall & Long Lane Watnall	Requests both sites be included in GB review - assessed together the sites do not serve 4 of the 5 GB purposes. Development of sites would enable creation of open space and public access to ancient woodland. On-site flooding can be mitigated and would provide opportunities for habitat creation.	Noted and decisions on Green Belt boundary change will be taken later in Local Plans.

N Baseley	iba planning		Welcome, concise & helpful document and agree with general approach. Emphasises the importance of standardisation between assessments to ensure similar sites are not scored differently because of different officer judgements. Timescales for subsequent reviews set out in the document would be helpful. Would like to be directly consulted on each and every consultation stage.	Noted and timescales will be specified in each Council's LDS
Geoffrey Prince Associates Ltd	Langridge Homes Ltd	Land at Westhouse Farm, Bestwood Land off Longue Drive, Calverton Land off Hollinwood Lane, Calverton Land at Redhill, off Mansfield Road Land to South of Lambley Lane (Gedling)	Appears to be a repeat of work already undertaken and cannot understand why the LPAs are not progressing immediately to Publication Version of Part 2 LPs. This will lead to further delays to commitments made by the LPAs during the ACS examination to significantly boost the supply of land for housing delivery. Believe that the sites have been assessed through the ACS, SHLAA and other documents. Undertaken own assessment of sites and conclude that they should be removed from the GB.	Work is necessary and required under Policy 3 of the ACS as agreed by the ACS Inspector.
Phoenix Planning	R C Tuxford Exports Ltd.	Former Car Park, off North Green, Calverton (Gedling)	Concerned about 2 stage approach to reviewing sites and thinks a detailed assessment of all sites should be undertaken. Object to para 5.5 of review as defensible boundaries can be built into a housing scheme. A site should not have to have two boundaries adjoining an existing settlement to be considered suitable, visual connection and sense of visual enclosure should be a consideration in assessing urban sprawl. Precedence should be given to GB sites that currently contain inappropriate development. Landscape character and visual impact has limited reference. Site should be considered as urban land within the GB.	Two stage approach is endorsed in the ACS. Para 85 of NPPF refers to physical features. The initial assessment needs to recognise physical features that are already there. Two or more boundaries is a sensible starting point to assess urban sprawl (or lack of) and other judgments will also be made. Inappropriate development is to be considered in safeguarding the countryside from encroachment. Landscape issues will be addressed separately and decisions on boundary change will be taken in Local Plans. Quality of land (urban or otherwise) will be considered in Local Plans and is not a Green Belt matter.
Phoenix Planning	Gaintaime Ltd	Nottingham Road, Nuthall (Broxtowe)	Concerned about 2 stage approach to reviewing sites and thinks a detailed assessment of all sites should be undertaken. Object to para 5.5 of review because large sites should not be excluded from the assessment if there are smaller pockets within the site which may be suitable for release. Brinsley and Eastwood have areas that are historically sensitive (with relation to DH Lawrence) which should be protected.	Two stage approach is endorsed in the ACS. No change is needed to Para 5.5. If smaller areas can be released from the Green Belt without significant detriment to the purposes on including land in the Green Belt then this can still be done. Heritage issues will be addressed in line with the comments of English Heritage.

Phoenix Planning	Taylor Burrows Property	Wade Printers, Baker Road, Giltbrook (Broxtowe)	Concerned about 2 stage approach to reviewing sites and thinks a detailed assessment of all sites should be undertaken. Object to para 5.5 of review as defensible boundaries can be built into a housing scheme. A site should not have to have two boundaries adjoining an existing settlement to be considered suitable. Precedence should be given to GB sites that currently contain inappropriate development. Landscape character and visual impact has limited reference. Brinsley and Eastwood have areas that are historically sensitive (with relation to DH Lawrence) which should be protected. Site should be considered as urban land within the GB.	Two stage approach is endorsed in the ACS. Para 85 of NPPF refers to physical features. The initial assessment needs to recognise physical features that are already there. Two or more boundaries is a sensible starting point to assess urban sprawl (or lack of). Inappropriate development is to be considered in this framework. Landscape issues will be addressed separately and decisions on boundary change will be taken in Local Plans.
WYG	British Land PLC	Broxtowe Borough	Flawed framework because of 2 stage approach. It is inappropriate to dismiss broad areas at the initial stage that might contain smaller areas suitable for further assessment under stage 2. Stage 2 is flawed because there is the potential for LPAs to only review the GB of SHLAA sites thus focusing on final land use rather than an areas ability to meet GB purposes or accommodate any type of development. The GB review should endure across future plan periods, to only remove land from GB to accommodate the development needs of the ACS means that it will have to be reviewed again in the future - contrary to para 83 of the NPPF. It is inappropriate to dismiss broad areas because of lack of defensible boundary as this requires finer-grained assessment. It is also inappropriate to only compare SHLAA sites as this only serves the needs of housing development in the current plan period.	Two stage approach is endorsed in the ACS. No change is needed to Para 5.5. If smaller areas can be released from the Green Belt without significant detriment to the puposes of including land in the Green Belt then this can still be done. The review will inform Green Belt boundary change and also potentially for safeguarded land (to avoid the need for further reviews). This will be a decision to take in the Local Plan.
Iplan Solutions	Foulds Investment Ltd & Caunton Engineering Ltd		Assessment continually refers to need to accommodate large-scale residential development - concern that the need to identify land to fulfil employment purposes being overlooked. Sustainable development as set out in the NPPF incorporates economic growth. Because document will form part of the future evidence base it is important that it doesn't focus solely on residential development as this will introduce bias into the assessment. The assessment framework should specifically state that it's intended to encompass potential development requirements beyond the plan period and the GB review should be done in a manner which accommodates growth beyond 2028. Safeguarded land should be identified using extrapolated levels of growth on a pro-rata basis over the 15 period beyond 2028 - this builds in flexibility for development to be brought forward in advance of the completion of the next LP. It is important that over-emphasis is not placed on desk-based assessment work. Object to wording of footnote 2 - this should relate to all settlements and not just 'large built-up areas'. Assessment should be restricted to that as set out in 1st bullet point para 80 of NPPF. 'Rounding off' is subjective and should not be applied in a dogmatic manner. Emphasis should not be solely on PD land but should be weighted in favour of derelict land by comparison with other non-derelict sites. Object to assessment criteria that site should have to have 2 or more boundaries adjoining a settlement. Point accumulation from matrix lacks refinement. 3 tier comparative assessment criteria should be used for the 5th GB purpose - where positive emphasis is placed on PD land adjoining existing settlement boundary.	The Green Belt assessment framework will be used to inform decisions on amending Green Belt boundaries to accommodate all development requirements (not just housing). The review will inform Green Belt boundary change and also potentially for safeguarded land (to avoid the need for further reviews). This will be a decision to take in the Local Plans. Footnote 2 already relates to all settlements. Rounding off is a proper Green Belt matter to consider and although this does require a planning judgment to be made this will ultimately be considered by the Local Plan Inspector at examination. Emphasis on derelict land is not a factor that should be given significant weight in the Green Belt framework (quality of land is not a factor in its purpose in the Green Belt) but will be considered at the time of decisions on Green Belt boundary change. Two or more boundaries is a sensible criteria to assess urban sprawl. The assessment criteria strikes the appropriate balance between clarity and flexibility.

Planning and Design Group	J McCann (Nottm) Ltd	Land East of Field Farm (Broxtowe)	Welcome review but have concerns that a scoring system in isolation is potentially flawed. Inspectors report provides evidence supporting release of this land which should not be lost in scoring system. On-site assessment is essential and boundaries and constraints should be assessed in 3 dimensions (i.e. should not be constrained by SHLAA submissions or land ownerships) as sites in combination may be suitable or smaller parts of larger sites. Using field boundaries as a defensible boundary should be limited and bias should be given to hard to breach boundaries. Preference should be given to poor quality agricultural land and also previously developed land (*suggest text along these lines for inclusion in the assessment criteria). Suggest further subdivision within the matrix to show level of harm within criterion.	The assessment criteria strikes the appropriate balance between clarity and flexibility. The Green Belt assessment framework will be used to inform decisions on amending boundaries but is separate to SHLAA submissions. The level of containment by physical features is a factor to be taken into account in this framework. Poor quality agricultural land and previously developed land are not Green Belt matters but will be considered in the Local Plans.
Members of the Public				
N & B Judd		Clifton & surrounding area (Nottingham City)	Object to how consultation undertaken and considers it to be not legally compliant. Existing GB in Clifton & surrounding area not there to be diminished.	Consultation will be undertaken on the Plan. This is evidence to inform it.
J Potter		Clifton & surrounding area (Nottingham City)	<p>Members of the public should have received a direct consultation on the document.</p> <p>Concerns raised about Assessment Criteria</p> <ul style="list-style-type: none"> - "To assist safeguarding the countryside from encroachment" - current terminology distorts meaning away from protection - "Inappropriate development" may be as a result of poor planning decisions - "Urban fringe" unhelpful phrase, instead use interior Green Belt or interior countryside - "To preserve the setting and special character of historic towns" Mature Landscape Area designation or undesignated heritage assets - "... harm that may be caused ..." unhelpful phrasing <p>Concerns raised about the Assessment Matrix</p> <ul style="list-style-type: none"> - "Check the unrestricted sprawl of settlements" - the site may have other value - "Prevent neighbouring settlements from merging into one another" - historical perception on the gap could also be relevant. - "Assist in safeguarding the countryside from encroachment" and/or "Preserve the setting and special character of historic settlements" there is a duty to protect rural areas <p>Clifton Green Belt boundary to the east and south east is clearly bounded by Farnborough Road and Summerwood Lane.</p>	<ul style="list-style-type: none"> • Consultation will be undertaken on the Plan. This is evidence to inform it. • Relevant terminology used in the assessment criteria is taken from the National Planning Policy Framework, therefore it is appropriate to use. For example, the meaning of the wording "inappropriate development" is defined in the NPPF (as explained in the glossary in the document). • The comments on the assessment matrix on "other value" (eg landscape) will be covered by other assessments for example the Sustainability Appraisal. Other terminology is also taken directly from the NPPF. There is a legal duty to promote sustainable development rather than a duty to protect the Countryside. • The framework will be used to make assessment to the Green Belt around Clifton and will take account of defensible boundaries including main roads.