
Nottingham City Council

Response to Matter 3

Green Belt



**Nottingham
City Council**

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Issue 1: Review of Green Belt boundaries

Q1. *Has the principle of reviewing the Green Belt been established in the ACS? If so, does the Plan accord with the principles set out in the ACS in this regard?*

3.1 Yes, the principle of removing land from the Green Belt was established in the ACS. The Inspector's report on the ACS ([LAPP-CROSS-02](#)) at para 118 states that "the ACS should give direction to Part 2 Local Plans to emphasise that non-Green Belt sites have first preference and that sites to be released from the Green Belt must have good sustainability credentials". Policy 3 was therefore amended to ensure a sequential approach be followed when Green Belt boundaries are reviewed in the Part 2 Local Plans and sites for development selected, giving maximum protection to Green Belt land. The adopted Policy 3 states;

"2. In reviewing 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."

3.2 The 2012 NPPF confirms the importance that Government attaches to Green Belt and stresses the fundamental aim of Green Belt policy of preventing urban sprawl by keeping land permanently open (Para 79 of the 2012 NPPF). The five purposes of Green Belt are recognised, and ACS ([LAPP-CROSS-01](#)) Policy 3 The Green Belt confirms that the principle of the Nottingham Derby Green Belt will be retained. The ACS also confirms that the Part 2 Local Plans will review the Green Belt boundary to meet their development land requirements. The review for Nottingham City is set out in the Green Belt Background Paper, January 2016 ([LAPP-CD-BACK-12](#)). The LAPP has been prepared to be consistent with the ACS in this matter.

3.3 The Nottingham Derby Green Belt is a long established policy tool and drawn very tightly around the built up areas of Greater Nottingham. When reviewing the Green Belt boundary, the original purposes of Green Belt as set out in the 2012 NPPF were a key consideration. Non Green Belt opportunities to expand existing settlements are extremely limited and therefore exceptional circumstances require the boundaries of the Green Belt to be reviewed in order to meet the development requirements of the ACS and LAPP.

3.4 Ashfield, Broxtowe, Gedling and Nottingham City Councils worked jointly to prepare evidence to support their emerging Local Plans. The Green Belt Background Paper, January 2016 ([LAPP-CD-BACK-12](#)) follows on from the agreed joint framework that the authorities produced to help inform part of that evidence base setting out a methodology for reviewing Green Belt boundaries. This was consulted upon in early 2015. Consultation of this document took place between 29 January 2016 and 11 March 2016.

3.5 The Government places particular importance on promoting sustainable patterns of development (2012 NPPF para 17) and a lower housing provision was not viewed to be sustainable when considering environmental, social and economic factors. It is

considered that the approach to the proposed distribution of growth is justified and consistent with sustainable development.

- 3.6 The Nottingham City Green Belt Review only recommends one significant area of land (PA59 former Fairham Comprehensive School) for release from the Green Belt within Nottingham City. Other areas of land for amendments have also been assessed, but it was concluded that there are no exceptional circumstances. The Green Belt Review was also used as an opportunity to correct minor cartographic errors from the existing Green Belt boundary particularly given the improvement in Geographic Information System data since the adoption of the 2005 Local Plan when the Green Belt boundary was last reviewed.

Q2. *Have exceptional circumstances been demonstrated to justify the alterations to the Green Belt proposed in the Plan?*

- 3.7 Yes, exceptional circumstances been demonstrated to justify the alterations to the Green Belt proposed in the LAPP. A two-stage approach was undertaken with the ACS providing direction to the LAPP and the emphasis that non-Green Belt sites have first preference and that sites to be released from the Green Belt should have good sustainability credentials.

- 3.8 Once established, the 2012 NPPF (para 83) identifies that Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. The Inspector's report on the ACS ([LAPP-CROSS-02](#)) confirmed at para 111.

"I agree with the Councils that the exceptional circumstances required for alterations to Green Belt boundaries exist."

- 3.9 The Green Belt Background Paper, January 2016 ([LAPP-CD-BACK-12](#)) used the methodology agreed with neighbouring authorities to review the Green Belt. The review has taken account of the 5 purposes of Green Belt as set out in Part 9 of the 2012 NPPF. The assessments have allowed a view to be taken on whether there are specific areas of land that should be considered for release from the Green Belt through the Part 2 Local Plan review. Any release of land from the Green Belt, needs to demonstrate exceptional circumstances as directed by the 2012 NPPF (para 83).

- 3.10 The 2018 NPPF sets out a new criteria to satisfy whether exceptional circumstances exist to allow Green Belt release to meet development needs. These include the assessment of all other reasonable options for meeting those identified needs as well as demonstrating whether the strategy makes as much use as possible of suitable brownfield sites and underutilised land; optimises the density of development; and is informed by a Statement of Common Ground with neighbouring authorities as to whether they could accommodate some of the identified need for development. This is set out in a revision to the former criteria used in the original Framework.

- 3.11 One site in Nottingham City is proposed for removal from the Green Belt by the LAPP as an allocation to assist in meeting the City's housing need, PA59 - Former Fairham Comprehensive School. This is a brownfield site adjacent to the built up area, capable of delivering defensible boundaries and where compensatory measures are proposed in terms of open space/nature conservation enhancements. The site is owned by the City Council, capable of supporting early housing delivery, and its nature lends itself to meeting the identified need for family housing. Further

information on this allocation in the context of Green Belt review is set out at pages 46 to 49 of the Green Belt Background Paper ([LAPP-CD-BACK-12](#)).

- 3.12 2018 NPPF sets out that where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport. In addition, national policy also states that when drawing new boundaries they should set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land. One major site proposed to be released from the Green Belt and allocated for development is PA59 former Fairham Comprehensive School. Not only is this land made up of a large parcel of brownfield land, the development principles emphasise the importance of sensitive design to minimise impacts, particularly at the boundaries of the site where enhanced planting should be provided to filter and soften views and to reinforce the Green Belt boundary. The development principles also set out that there are opportunities to the south and east of the site for provision of improved publicly accessible green space and biodiversity. Therefore through allocation development will ensure that a permanent new Green Belt boundary will be established along with compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.
- 3.13 Further changes to the Green Belt are proposed through the LAPP, but these are being implemented to correct previous drafting errors or to reflect actual development patterns or follow clearer defensible boundaries. All of these changes are minor, but the need to accurately reflect defensible Green Belt boundaries in the LAPP are considered to constitute exceptional circumstances, which are fully evidenced and justified in the Background Paper.
- 3.14 ACS Policy 2 (The Spatial Strategy) sets out a strategy of urban concentration and regeneration. This approach prioritises the reuse of previously developed (brownfield land). This strategic principle has been used in the allocation of LAPP sites and provides further exceptional circumstances for the allocation of PA59 which constitutes previously developed land.

Post Submission Changes as a Result of this Statement

- 3.15 No further Post Submission changes are being proposed.