## **Nottingham City Council**



Additional Response to Matter 3: Green Belt in Response to Inspector's Question

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#### 1 Introduction

1.1 The Inspector has made the following request of the Council:

'I would be grateful if you would inform the Council that at the session on Matter 3 Green Belt I will wish to explore the exceptional circumstances to justify the alterations to the Green Belt proposed in the Plan, both in relation to the site PA59 which is proposed to be released from the Green Belt and allocated for development and the other various proposed changes which it suggests are minor and are being sought to correct previous drafting errors, to reflect actual development patterns or to reflect defensible Green Belt boundaries.

With regard to the proposed 'minor' changes I will wish to go through each of these and seek an explanation from the Council.

It would therefore be helpful if the Council would provide either a short note before the hearing session explaining the rationale for each of the proposed 'minor' changes or be prepared to go through each of them at the hearing session.'

1.2 This short note is the Council's response to this request.

#### 2 Exceptional Circumstances

- 2.1 The starting point for explaining EC for the Green Belt review undertaken as part of the preparation of the LAPP is the NPPF (2012 version in this case). The NPPF states that:
  - '83. Local Planning Authorities with Green Belts in their areas should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.
  - 84. When drawing up or reviewing Green Belt boundaries Local Planning Authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary.' [Emphasis added].

- 2.2 'Exceptional circumstances' remains undefined. The NPPF entrusts decision-makers with reaching sound planning judgments on whether exceptionality exists in the circumstances of the individual case. (Mr Justice Jay, Calverton Parish Council vs Nottingham City Council, Broxtowe Borough Council and Gedling Borough Council [2015] EWHC 1078 (Admin)).
- 2.3 ACS Policy 3 covers the Green Belt. Save for the 'Strategic Allocations' already considered by the ACS (not relevant to Nottingham), the policy states that the detailed review of Green Belt boundaries, to the extent necessary to deliver the distributions in Policy 2, will be undertaken in Part 2 Local Plans. A sequential approach (introduced by way of Main Modification 18) will then be deployed, as set out in Policy 3 section 2, whilst Policy 3 section 3 lists the matters that such a review should give consideration to, in particular to the Green Belt's statutory purposes.
- 2.4 The Inspector's report into the ACS states (<u>LAPP-CROSS-07 Nottingham Local Plan 2005 Inspectors Report, 2005</u>):-
  - '111. The NPPF continues the well-established planning policy of protecting Green Belt land. 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. <u>I agree with the Councils that the exceptional circumstances required for alterations to Green Belt boundaries exist.</u>' (Emphasis added).

#### 3 LAPP Green Belt Review

3.1 In accordance with the ACS, a review of the Green Belt boundaries was undertaken (Green Belt Background Paper, January 2016 LAPP-CD-BACK-12). This looked at all of the Green Belt within the City's area, on a methodology agreed with Ashfield, Broxtowe and Gedling Borough Councils (LAPP-ENVIRO-22), who undertook a similar exercise. In Appendix 2 is a summary of the consultation comments received. Within the Inspector's Report (para 67) for the recent examination into the Gedling Borough Local Planning Document (Part 2 Local Plan) examination she concluded that.

'I am satisfied that the approach set out in the Green Belt Assessment Framework, and subsequently used in the Council's Green Belt Assessment, accords with the sequential approach to guide site selection and those matters to be considered when reviewing Green Belt boundaries set out in ACS Policy 3. As such, it does not deviate from the principles set out in the ACS in this regard.'

- 3.2 The primary purpose of this review was to meet ACS Policy 3 Section 2, to deliver the distribution of development in Policy 2 of the ACS. In undertaking this review, in accordance with ACS Policy 3 section 3, regard was had to the statutory purposes of the Green Belt, including retaining or creating defensible boundaries, as stated by paragraph 83 of the 2012 NPPF.
- 3.3 The outcome of this review concluded one major amendment to the Green Belt was appropriate to accommodate development in Nottingham City's Green Belt (Site Allocation for PA59), together with a number of minor or moderate amendments to the detailed boundaries (set out in <a href="Green Belt Background Paper">Green Belt Background Paper</a>, January 2016 LAPP-CD-BACK-12 but also repeated in Appendix 1).
- 3.4 An explanation to each change to the Green Belt is shown in the table at Appendix 1 of this note. The table includes a summary of what, in the City Council's planning judgment, the exceptional circumstances are for each minor or moderate change. The exceptional circumstances for the one major amendment to accommodate PA59 are set out at section 5 below.

#### 4 Minor or Moderate Amendments

- 4.1 The amendments comprise almost entirely of minor or moderate amendments to the detailed boundaries, which are to correct previous drafting inaccuracies (the original boundaries date back to the Green Belt Plan adopted in 1989, which pre-dated accurate GIS mapping techniques), reflect more recent development patterns, and ensure that boundaries coincide with defensible boundaries. The difference between minor and moderate changes is a judgement based on the extent of Green Belt affected, and does not reflect any consideration of suitability for development.
- 4.2 The City Council's planning judgment in these cases is that the advance in mapping technology, the need to reflect more recent development patterns and the desire for the Green Belt boundaries to have defensible and logical boundaries (particularly across adjoining local authority boundaries so far as practical) are the exceptional circumstances required by paragraph 83 of the NPPF. The degree of exceptionality suits the circumstances of each of these cases, particularly in the light of NPPF para 85 which states that local planning authorities should define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.
- 4.3 Where there are obvious issues the Council considers it needs to act to protect and promote the integrity of Green Belt. However, when addressing these previous drafting errors to the Green Belt, considering actual development patterns or reflecting defensible Green Belt boundaries, the principle has been to limit change to the Green Belt boundary. In circumstances where it is considered appropriate to make changes, the most

defensible boundary has been chosen using a hierarchy of suitable boundaries. The highest of these is main roads, railway lines, rivers or canals, then more minor roads, hedge lines and then built form of buildings or public footpaths/cycle paths. Unless ensuring consistency with adjoining Council's Green Belt, urban form has been excluded from the Green Belt, so where for example a road/traffic island etc was washed over by the Green Belt previously, the Green Belt boundary has been pulled back to exclude this form of development (for example see map change 3B02 on page 149 of Green Belt Background Paper, January 2016 LAPP-CD-BACK-12).

- 4.4 The comprehensive re-assessments of the Green Belt used Ordnance Survey maps, topographical maps, aerial photographs, and site visits to help inform professional judgement.
- 4.5 The amount of change to the Green Belt is relatively low in comparison to the amount of Green Belt within Nottingham City's administrative boundary. In area, 5.94 hectares are proposed to be added to the Green Belt and 16.55 hectares proposed to be removed leaving a net change of –10.62 hectares. If the major amendment for PA59 (7.49 hectares) is removed, the net change in the Green Belt for the minor/moderate changes is only 3.13 hectares which equates to only 0.42% of the original 2005 Green Belt boundary.
- 5 Major Amendment, PA59 Farnborough Road, Former Comprehensive School
- 5.1 The assessment of this site is at page 46-50 of <u>LAPP-CD-BACK-12 Green Belt Background Paper</u>, <u>January 2016</u>. Since the preparation of the Background Paper, the school buildings have been demolished, due to vandalism and anti social behaviour.
- 5.2 Paragraph 6.40 of the Background Paper reports the exceptional circumstances identified at the time of ACS preparation for removing this site from the Green Belt as being 'the lack of sufficient urban sites to meet this need (each Councils SHLAA), and that meeting this need in the distribution proposed by the Councils amounts to sustainable development as reported in the [ACS] SA.' Identifying exceptional circumstances at a strategic level still requires exceptional circumstances to be considered on a site by site basis, and the Green Belt Background Paper (paragraphs 6.40 to 6.43) and Appendix A to the Council's Statement in Response to the Inspector's MIQs. Matter 4, Issue 8 (Site Allocations) paragraphs to 4.449 to 4.453 explain why this site has been identified for removal. Paragraphs 6.44 and 6.45 of the LAPP-CD-BACK-12 Green Belt Background Paper, January 2016 explain how any impact on the Green Belt is limited by this allocation.
- 5.3 2012 NPPF paragraph 84 charges local authorities with taking account of the need to promote sustainable patterns of development. The ACS considered

the consequences for sustainable development of channelling development towards urban areas within (inside) the Green Belt boundary, and concluded that a strategy of urban concentration and regeneration was the most sustainable strategy.

- In addition to this, the site is a brownfield site, and the 2012 NPPF states that the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development is not inappropriate development. Whilst not an exceptional circumstance in itself, and not part of the original justification for exceptional circumstances, paragraph 138 of the 2018 NPPF also supports this approach. It states 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.' See also paragraph 3.12 of the Council's Statement in Response to the Inspectors MIQs (Matter 3).
- 5.5 Although it is acknowledged that the City Council's housing supply has improved during the LAPP preparation period, and now includes an appropriate buffer to account for non delivery, it is the City Council's view that exceptional circumstances still exist for the removal of this site form the Green Belt. This is for two reasons. Firstly because the buffer is just that, a quantity of housing over and above the minimum requirements of the City, to ensure that at least the minimum housing provision is delivered. Secondly, the site is part of a range and choice of sites, it is owned by the City Council and therefore housing delivery is more certain, and it is also a site capable of accommodating family housing, to support the identified need for this type of housing.
- 5.6 New boundaries are proposed as part of the removal of this site form the Green Belt, which reflect the risk of flooding of part of the land (outside the allocation), and the development of the site will have regard to the intended permanence of the boundaries, so that they will be capable of enduring beyond the plan period.

#### 6 Conclusion

6.1 The City Council believes it has reached justified sound planning judgments on whether exceptionality exists in each of the individual circumstances of the amendments proposed to the Green Belt by the LAPP.

### Appendix 1: Exceptional Circumstances for Changes to the Nottingham City Green Belt Boundary

Set out below are the exceptional circumstances the Council considers for each minor & moderate change to the Nottingham City Green Belt Boundary. The 'Area', 'Broad Green Belt Area', 'Map' and page number referred to in the table below are from <u>LAPP-CD-BACK-12 Green Belt Background Paper</u>, January 2016.

				Level of	
Area	Broad Green Belt Area	Мар	Page	change	Exceptional Circumstances
	Bulwell Hall Park and Nottingham				Minor change - to follow more defensible boundary and improve
North	Golf Club	1A01	80	Minor	accuracy (to follow footpath)
					Minor change - to follow more defensible boundary and improve
	Bulwell Hall Park and Nottingham				accuracy (remove end of Lawton Drive/footpath from Green
North	Golf Club	1A02	81	Minor	Belt)
	Bulwell Hall Park and Nottingham				Minor change - to follow more defensible boundary and improve
North	Golf Club	1A03	82	Minor	accuracy (removing footpath from Green Belt)
	Bulwell Hall Park and Nottingham				Minor change - to follow more defensible boundary and improve
North	Golf Club	1A04	83	Minor	accuracy (removing footpath from Green Belt)
					Minor change - to follow more defensible boundary and improve
	Bulwell Hall Park and Nottingham				accuracy (remove footpath from Green Belt and follow curtilage
North	Golf Club	1A05	84	Minor	of building and boundary of the park)
					Minor change - to follow more defensible boundary and improve
	Bulwell Hall Park and Nottingham				accuracy (remove footpath from Green Belt and follow curtilage
North	Golf Club	1A06	85	Minor	of building and boundary of the park)
	Bulwell Hall Park and Nottingham				Minor change - to follow more defensible boundary and improve
North	Golf Club	1A07	86	Minor	accuracy (follow boundary of the park)
	Bulwell Hall Park and Nottingham				Minor change - to follow more defensible boundary and improve
North	Golf Club	1A08	87	Minor	accuracy (follow boundary of the park)
	Bulwell Hall Park and Nottingham				Minor change - to follow more defensible boundary and improve
North	Golf Club	1A09	88	Minor	accuracy (follow boundary of the park)
	Bulwell Hall Park and Nottingham				Minor change - to follow more defensible boundary and improve
North	Golf Club	1A10	89	Minor	accuracy (follow boundary of the park)
	Bulwell Hall Park and Nottingham				Minor change - to follow more defensible boundary and improve
North	Golf Club	1A11	90	Minor	accuracy (follow boundary of the park)

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<b>A</b>	B 10 B 14			Level of	5
Area	Broad Green Belt Area	Мар	Page	change	Exceptional Circumstances
	Land to Mast of Calledo Mast Drive				Minor change - to follow more defensible boundary and improve
North	Land to West of Seller's Wood Drive	1001	01	Minor	accuracy (extend Green Belt to edge of Seller's Wood Drive
North	West	1B01	91	Minor	West)
	Land to West of Seller's Wood Drive				Minor change - to follow more defensible boundary and improve
North	West	1B02	92	Minor	accuracy (extend Green Belt to edge of Seller's Wood Drive West and remove Green Belt from Wood Link)
NOILII	West	1002	92	IVIII IOI	Minor change - to follow more defensible boundary and improve
	Land to West of Seller's Wood Drive				accuracy (extend Green Belt to edge of Seller's Wood Drive
North	West	1B03	93	Minor	West and remove Green Belt from Wood Link)
1401111	VVCSt	1000	33	IVIIIIOI	Minor change - to follow more defensible boundary and improve
					accuracy (remove Green Belt from Wood Link and extend
	Land to West of Seller's Wood Drive				Green Belt to follow urban boundary rather than the
North	West	1B04	94	Minor	administrative boundary)
		1201			Minor change - to follow more defensible boundary and improve
	Land to West of Seller's Wood Drive				accuracy (extend Green Belt to follow urban boundary rather
North	West	1B05	95	Minor	than the administrative boundary)
					Minor change - to follow more defensible boundary and improve
	Land to West of Seller's Wood Drive				accuracy (extend Green Belt to follow urban boundary rather
North	West	1B06	96	Minor	than the administrative boundary).
					Minor change - to follow more defensible boundary and improve
	Land to West of Seller's Wood Drive				accuracy (extend Green Belt to follow urban boundary rather
North	West	1B07	97	Minor	than the administrative boundary).
					Moderate change - to correct error in the 2005 Green Belt
	Land around Nottingham Business				boundary (remove Woodhouse Way and follow more defensible
West	Park	2A01	99	Moderate	boundary/built form around the business park)
	l				Moderate change - to correct error in the 2005 Green Belt
101	Land around Nottingham Business	0.4.00	400		boundary (follow more defensible boundary/built form around
West	Park	2A02	100	Moderate	the business park)
\\/a - 1	Land around Nottingham Business	0.4.00	404	NIA ala arra	No change
West	Park	2A03	101	No change	No change
	Lond around Nottice to and Decision				Minor change - to correct error in the 2005 Green Belt boundary
Moot	Land around Nottingham Business	2404	100	Minor	(follow more defensible boundary/built form around the business
West	Park	2A04	102	Minor	park)

				Level of	
Area	Broad Green Belt Area	Мар	Page	change	Exceptional Circumstances
West	Land around Nottingham Business Park	2A05	103	Minor	Minor change - to correct error in the 2005 Green Belt boundary (follow more defensible boundary/built form around the business park)
West	Land around Nottingham Business Park	2A06	104	Minor	Minor change - to correct error in the 2005 Green Belt boundary (follow more defensible boundary/built form around the business park)
West	Land West of Bilborough Road	2B01	105	No change	No change
West	Land West of Bilborough Road	2B02	106	No change	No change
West	Land West of Bilborough Road	2B03	107	No change	No change
South	Land North-west of Clifton	3A07	109	Moderate	Moderate change - follow more defensible boundary/built form (Green Belt amended to reflect built form of Lark Hill Retirement Village)
South	Land North-west of Clifton	3A09	110	Moderate	Moderate change - follow more defensible boundary/built form (Green Belt amended to reflect built form of Lark Hill Retirement Village and exclude Barton Lane from the Green Belt following realignment of A453)
South	Land North-west of Clifton	3A10	111	Moderate	Moderate change - follow more defensible boundary/built form (exclude Barton Lane from the Green Belt including following realignment of A453)
South	Land North-west of Clifton	3A11	112	Minor	Minor change - to follow more defensible boundary and improve accuracy (exclude Barton Lane from the Green Belt following realignment of A453)
South	Land North-west of Clifton	3A12	113	Moderate	Moderate change - follow more defensible boundary/built form (exclude Barton Lane from the Green Belt following realignment of A453)
South	Land North-west of Clifton	3A13	114	Minor	Minor change - to follow more defensible boundary and improve accuracy (follow rear boundaries)
South	Land North-west of Clifton	3A14	115	Minor	Minor change - to follow more defensible boundary and improve accuracy (follow rear boundaries)
South	Land North-west of Clifton	3A15	116	Minor	Minor change - to follow more defensible boundary and improve accuracy (follow rear boundaries)

	B 10 B 14		_	Level of	
Area	Broad Green Belt Area	Мар	Page	change	Exceptional Circumstances
0	Land Nambassat of Olitica	0.440	447	N 41:	Minor change - to follow more defensible boundary and improve
South	Land North-west of Clifton	3A16	117	Minor	accuracy (follow rear boundaries)
0	Land Nambassat of Olitica	0.4.7	440	N 41:	Minor change - to follow more defensible boundary and improve
South	Land North-west of Clifton	3A17	118	Minor	accuracy (follow rear boundaries)
0 11		0.440	440		Minor change - to follow more defensible boundary and improve
South	Land North-west of Clifton	3A18	119	Minor	accuracy (follow rear boundaries)
0 11		0.4.0	400		Minor change - to follow more defensible boundary and improve
South	Land North-west of Clifton	3A19	120	Minor	accuracy (follow rear boundaries and edge of woodland)
				l	Minor change - to follow more defensible boundary and improve
South	Land North-west of Clifton	3A20	121	Minor	accuracy (follow rear boundaries and edge of woodland)
					Minor change - to follow more defensible boundary and improve
South	Land North-west of Clifton	3A21	122	Minor	accuracy (follow rear boundaries)
					Minor change - to follow more defensible boundary and improve
South	Land North-west of Clifton	3A22	123	Minor	accuracy (follow rear boundaries)
					Minor change - to follow more defensible boundary and improve
South	Land North-west of Clifton	3A23	124	Minor	accuracy (follow rear boundaries)
					Minor change - to follow more defensible boundary and improve
South	Land North-west of Clifton	3A24	125	Minor	accuracy (follow rear boundaries)
					Minor change - to follow more defensible boundary and improve
South	Land North-west of Clifton	3A25	126	Minor	accuracy (follow rear boundaries)
					Minor change - to follow more defensible boundary and improve
South	Land North-west of Clifton	3A26	127	Minor	accuracy (follow rear boundaries)
					Minor change - to follow more defensible boundary and improve
South	Land North-west of Clifton	3A27	128	Minor	accuracy (follow rear boundaries)
					Minor change - to follow more defensible boundary and improve
South	Land North-west of Clifton	3A28	129	Minor	accuracy (follow rear boundaries)
					Minor change - to follow more defensible boundary and improve
South	Land North-west of Clifton	3A29	130	Minor	accuracy (follow rear boundaries)
					Minor change - to follow more defensible boundary and improve
South	Land North-west of Clifton	3A30	131	Minor	accuracy (follow rear boundaries)
		5. 100			
Courth	Land North west of Clifton	2 4 24	122	Minor	Minor change - to follow more defensible boundary and improve
South	Land North-west of Clifton	3A31	132	Minor	accuracy (follow rear boundaries)

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Area	Broad Green Belt Area	Мар	Page	change	Exceptional Circumstances
					Minor change - to follow more defensible boundary and improve
0 11-	Level Newth week of Olitica	0.4.00	400	N 41:	accuracy (follow canal and be consistent with neighbouring
South	Land North-west of Clifton	3A32	133	Minor	Broxtowe's Green Belt)
					Minor change - to follow more defensible boundary and improve
Courth	Land North west of Clifton	2422	101	Minor	accuracy (follow canal and be consistent with neighbouring
South	Land North-west of Clifton	3A33	134	Minor	Broxtowe's Green Belt)
					Minor change - to follow more defensible boundary and improve
South	Land North-west of Clifton	3A34	135	Minor	accuracy (follow canal and new road access to Boots off Thane Road)
South	Land North-West of Children	3/134	133	IVIII IOI	Minor change - to follow more defensible boundary and improve
					accuracy (follow canal and new road access to Boots off Thane
South	Land North-west of Clifton	3A35	136	Minor	Road)
Oodiii	Land North-West of Olliton	37.00	130	IVIIIIOI	Minor change - to follow more defensible boundary and improve
South	Land North-west of Clifton	3A36	137	Minor	accuracy (extend Green Belt up to Thane Road)
Count	Edita Hotel Wood of Cilitari	07100	107	TVIII TO	Minor change - to follow more defensible boundary and improve
South	Land North-west of Clifton	3A37	138	Minor	accuracy (extend Green Belt up to Thane Road)
					Minor change - to follow more defensible boundary and improve
South	Land North-west of Clifton	3A38	139	Minor	accuracy (extend Green Belt up to Thane Road)
					Minor change - to follow more defensible boundary and improve
South	Land North-west of Clifton	3A39	140	Minor	accuracy (extend Green Belt up to Thane Road)
					Minor change - to follow more defensible boundary and improve
South	Land North-west of Clifton	3A40	141	Minor	accuracy (extend Green Belt up to Thane Road)
					Minor change - to follow more defensible boundary and improve
					accuracy (extend Green Belt up to Thane Road and remove
South	Land North-west of Clifton	3A41	142	Minor	Green Belt to follow Cycle path)
					Minor change - to follow more defensible boundary and improve
South	Land North-west of Clifton	3A42	143	Minor	accuracy (remove Green Belt to follow Cycle path)
	1				Minor change - to follow more defensible boundary and improve
South	Land North-west of Clifton	3A43	144	Minor	accuracy (remove Green Belt to follow Cycle path/bridge)
					Minor change - to follow more defensible boundary and improve
South	Land North-west of Clifton	3A44	145	Minor	accuracy (remove Green Belt to follow Cycle path/bridge)

Area   Broad Green Belt Area   Map   Page   change   Exceptional Circumstances   Minor change - to follow more defensible boundary and improve accuracy (remove Green Belt to follow Cycle path/bridge and Clifton Lane)   Minor change - to follow more defensible boundary and improve accuracy (remove Green Belt to follow Clifton Lane)   Minor change - to follow more defensible boundary and improve accuracy (remove Green Belt to follow Clifton Lane)   Minor change - to follow more defensible boundary and improve accuracy (remove Green Belt to follow Clifton Lane)   Minor change - to follow more defensible boundary and improve accuracy (remove Green Belt to follow Clifton Lane)   Minor change - to follow more defensible boundary and improve accuracy (remove Green Belt to follow Clifton Lane)   Minor change - to follow more defensible boundary and improve accuracy (remove Green Belt to A453 traffic island)   Minor change - to follow more defensible boundary and improve accuracy (remove Green Belt to A453 traffic island)   Minor change - to follow more defensible boundary and improve accuracy (remove Green Belt to A453 traffic island)   Minor change - to follow more defensible boundary and improve accuracy (remove Green Belt to follow Westerfield Way) and Brookthorpe Way)   Minor change - to follow more defensible boundary and improve accuracy (remove Green Belt to follow wash of the provious accuracy (remove Green Belt to follow Prookthorpe Way)   Minor change - to follow more defensible boundary and improve accuracy (remove Green Belt to follow Prookthorpe Way)   Minor change - to follow more defensible boundary and improve accuracy (remove Green Belt to follow Prookthorpe Way)   Minor change - to follow more defensible boundary and improve accuracy (remove Green Belt to follow Prookthorpe Way)   Minor change - to follow more defensible boundary and improve accuracy (remove Green Belt to follow boundary and improve accuracy (remove Green Belt to follow boundary and improve accuracy (remove Green Belt to follow boun					Level of	
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					-	
						accuracy (extend Green Belt to follow boundary of rear gardens
South Land East of Clifton 3B11 158 Minor and exclude Clifton Lane)	South	Land East of Clifton	3B11	158	Minor	

_			_	Level of	
Area	Broad Green Belt Area	Мар	Page	change	Exceptional Circumstances
					Minor change - to follow more defensible boundary and improve
South	Land East of Clifton	3B12	159	Minor	accuracy (extend Green Belt to follow rear boundaries)
					Minor change - to follow more defensible boundary and improve
					accuracy (amend Green Belt to follow rear boundaries and
South	Land East of Clifton	3B13	160	Minor	exclude built form at the end of Hyde Close)
					Minor change - to follow more defensible boundary and improve
					accuracy (amend Green Belt to follow rear boundaries and
South	Land East of Clifton	3B14	161	Minor	exclude built form including the end of Hyde Close)
					Minor change - to follow more defensible boundary and improve
South	Land East of Clifton	3B15	162	Minor	accuracy (amend Green Belt to follow rear boundaries)
					Minor change - to follow more defensible boundary and improve
South	Land East of Clifton	3B16	163	Minor	accuracy (amend Green Belt to follow rear boundaries)
					Minor change - to follow more defensible boundary and improve
South	Land East of Clifton	3B17	164	Minor	accuracy (amend Green Belt to follow rear boundaries)
					Minor change - to follow more defensible boundary and improve
South	Land East of Clifton	3B18	165	Minor	accuracy (amend Green Belt to follow Farnborough Road)
					Minor change - to follow more defensible boundary and improve
South	Land East of Clifton	3B19	166	Minor	accuracy (amend Green Belt to follow Farnborough Road)
					Minor change - to follow more defensible boundary and improve
South	Land East of Clifton	3B20	167	Minor	accuracy (amend Green Belt to follow Farnborough Road)
					Minor change - to follow more defensible boundary and improve
South	Land East of Clifton	3B21	168	Minor	accuracy (amend Green Belt to follow Farnborough Road)
					Minor change - to follow more defensible boundary and improve
South	Land East of Clifton	3B22	169	Minor	accuracy (amend Green Belt to follow Farnborough Road)
					Minor change - to follow more defensible boundary and improve
					accuracy (amend Green Belt to follow Farnborough Road and
South	Land East of Clifton	3B23	170	Minor	exclude traffic island)
					Minor change - to follow more defensible boundary and improve
South	Land East of Clifton	3B24	171	Minor	accuracy (amend Green Belt to follow Farnborough Road)
					Major change - to exclude PA59 from the Green Belt (see
South	Land East of Clifton	3B25	172	Major	separate explanation)

				Level of	
Area	Broad Green Belt Area	Мар	Page	change	Exceptional Circumstances
					Major change - to exclude PA59 from the Green Belt (see
South	Land East of Clifton	3B26	173	Major	separate explanation)
					Major change - to exclude PA59 from the Green Belt (see
South	Land East of Clifton	3B27	174	Major	separate explanation)
				-	Major change - to exclude PA59 from the Green Belt (see
South	Land East of Clifton	3B28	175	Major	separate explanation)
				•	Major change - to exclude PA59 from the Green Belt (see
South	Land East of Clifton	3B29	176	Major	separate explanation)
				,	Major change - to exclude PA59 from the Green Belt (see
South	Land East of Clifton	3B30	177	Major	separate explanation)
				-	Major change - to exclude PA59 from the Green Belt (see
South	Land East of Clifton	3B31	178	Major	separate explanation)
				-	Major change - to exclude PA59 from the Green Belt (see
South	Land East of Clifton	3B32	179	Major	separate explanation)
				-	Major change - to exclude PA59 from the Green Belt (see
South	Land East of Clifton	3B33	180	Major	separate explanation)
					Major change - to exclude PA59 from the Green Belt (see
South	Land East of Clifton	3B33	181	Major	separate explanation)
					Minor change - to follow more defensible boundary and improve
					accuracy (extend Green Belt to follow built form and rear
East	Colwick Woods	4A01	183	Minor	gardens)
					Minor change - to follow more defensible boundary and improve
					accuracy (extend Green Belt to follow built form and rear
East	Colwick Woods	4A02	184	Minor	gardens)
					Minor change - to follow more defensible boundary and improve
East	Colwick Woods	4A03	185	Minor	accuracy (exclude railway from the Green Belt)
					Minor change - to follow more defensible boundary and improve
					accuracy (extend Green Belt to follow built form and rear
East	Colwick Woods	4A04	186	Minor	gardens)
					Minor change - to follow more defensible boundary and improve
					accuracy (extend Green Belt to follow built form and rear
East	Colwick Woods	4A05	187	Minor	gardens)

				Level of	
Area	Broad Green Belt Area	Мар	Page	change	Exceptional Circumstances
					Minor change - to follow more defensible boundary and improve
					accuracy (exclude railway from the Green Belt and built form of
East	Colwick Woods	4A06	188	Minor	PA40)
East	Colwick Woods	4A07	189	Minor	No change
					Minor change - to follow more defensible boundary and improve
East	Colwick Woods	4A08	190	Minor	accuracy (amend Green Belt to follow rear boundaries)
					Minor change - to follow more defensible boundary and improve
East	Colwick Woods	4A09	191	Minor	accuracy (amend Green Belt to follow rear boundaries)
				1	Minor change - to follow more defensible boundary and improve
East	Colwick Woods	4A10	192	Minor	accuracy (amend Green Belt to follow rear boundaries)
		4044	400		Minor change - to follow more defensible boundary and improve
East	Colwick Woods	4A11	193	Minor	accuracy (amend Green Belt to follow Greenwood Road)
<b></b> 4	Calvials Manda	4440	404	Minan	Minor change - to follow more defensible boundary and improve
East	Colwick Woods	4A12	194	Minor	accuracy (amend Green Belt to follow Greenwood Road)
					Minor change - to follow more defensible boundary and improve
East	Colwick Woods	4A13	195	Minor	accuracy (amend Green Belt to follow Greenwood Road and footpath)
Lasi	Colwick Woods	4/13	193	IVIII IOI	Minor change - to follow more defensible boundary and improve
East	Colwick Woods	4A14	196	Minor	accuracy (amend Green Belt to footpath)
Laot	Colwick Wedge	17311	100	10111101	Minor change - to follow more defensible boundary and improve
East	Colwick Woods	4A15	197	Minor	accuracy (amend Green Belt to footpath and built form)
					Minor change - to follow more defensible boundary and improve
					accuracy (amend Green Belt to footpath and built form as well
East	Colwick Woods	4A16	198	Minor	as excluding Colwick Road and Sewage Valve Compound)
					Minor change - to follow more defensible boundary and improve
					accuracy (amend Green Belt to footpath and built form as well
East	Colwick Woods	4A17	199	Minor	as excluding Colwick Road and Crossing Cottage)
					Minor change - to follow more defensible boundary and improve
					accuracy (remove Green Belt and align along edge of the
East	Colwick Woods	4A18	200	Minor	railway line)

				Level of	
Area	Broad Green Belt Area	Map	Page	change	Exceptional Circumstances
					Minor change - to follow more defensible boundary and improve accuracy (remove Green Belt and align along edge of the
East	Colwick Woods	4A19	201	Minor	railway line)
					Minor change - to follow more defensible boundary and improve
East	Colwick Woods	4A20	202	Minor	accuracy (remove Green Belt and align along edge of the railway line and follow footpath)
					Minor change - to follow more defensible boundary and improve accuracy (amend Green Belt to follow more defensible
East	Colwick Park/ Racecouse	4B01	203	Minor	boundaries around the racecourse)
East	Colwick Park/ Racecouse	4B02	204	Minor	No change
					Minor change - to follow more defensible boundary and improve accuracy (amend Green Belt to follow more defensible
East	Colwick Park/ Racecouse	4B03	205	Minor	boundaries around the racecourse)
East	Colwick Park/ Racecouse	4B04	206	No change	No change
					Minor change - to follow more defensible boundary and improve accuracy (amend Green Belt to follow more defensible
East	Colwick Park/ Racecouse	4B05	207	No change	boundaries around the racecourse)
East	Colwick Park/ Racecouse	4B06	208	No change	No change
<b>-</b> .		4507	000		Minor change - to follow more defensible boundary and improve accuracy (amend Green Belt to follow more defensible boundaries around curtilage of built form - Nottingham Sea
East	Colwick Park/ Racecouse	4B07	209	Minor	Cadet Corps off Waterside Way)

# Appendix 2: Summary of Consultation Comments Received on the Greater Nottingham and Ashfield Draft Green Belt Assessment Framework

Greater Nottingham and Ashfield Draft Green Belt Assessment Framework (4th August – 19th September 2014)

<u>Consultation documents</u>: A single document which included the proposed methodology for the Green Belt Review.

#### Publicity:

- Documents were made available in the following locations: Electronically on the Councils website, Paper versions: in Main Council Offices in Beeston.
- 80 emails and 73 letters sent directly to Duty to Co-operate bodies, Statutory Consultees, Town and Parish Councils throughout the Housing Market Area, house-builders, developers and land agents on the LDF database.

Summary of responses: A full summary of the responses to the draft Green Belt Assessment Framework consultation can be found on the Councils website. The responses were considered and the Green Belt Assessment Framework was refined before site assessments were undertaken throughout the autumn of 2014. A brief overview of the issues can be seen below: There was support for the crossboundary joint approach being taken by the Councils which would provide consistency. Some opposition to Green Belt release in principle and that local knowledge should inform the review. There was some concern about the two stage approach as some felt that by excluding broad areas the methodology would overlook smaller more appropriate areas with some suggestions on the size and locations of sites which should be reviewed under part 2. Some considered that defensible boundaries could be provided as part of a development and was not a necessary consideration for the review. Some suggested that the review was too residential orientated and that future employment development was not referenced enough. One representation suggested that land ownership or inclusion in the Strategic Housing Land Availability Assessment should not be a constraint. Timescale for the review was a concern for some as they felt that it would lead to delay with Local Plan preparation.

Historic England (formerly English Heritage) suggested some text changes to include non-designated heritage assets and Scheduled Ancient Monuments into the assessment criteria. Natural England suggested landscape, ecology and Green Infrastructure should form part of the assessment criteria.