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Aspbury Planning on behalf of D.W & J.W.E Wild

ID ref -634

Representations to Broxtowe Local Plan Part 2
Inspector's Matters, Issues and Questions

Matter 11 – Green Belt

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a) Site allocations in the Green Belt

1. Is the Green Belt review consistent with national policy in the NPPF and PPG's and with the sequential approach set down in Policy 2 of the ACS?

Response

Paragraph 136 of the NPPF states that: -

'Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period. Where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans.

Paragraph 3.3.1 on page 56 of the adopted Aligned Core Strategy confirms the exceptional circumstances for alteration of Green Belt boundaries: -

3.3.1 The Nottingham Derby Green Belt is a long established and successful planning policy tool and is very tightly drawn around the built up areas. Non-Green Belt opportunities to expand the area's 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 Aligned Core Strategies and part 2 Local Plans.

The Aligned Core Strategy confirmed the recasting of the Green Belt boundary to accommodate the Fields Farm SUE at Toton on the edge of the main built up area of Nottingham and the Part 2 Local Plan proposes further Green Belt release around the Nottingham built up area and limited release at the Key Settlements of Awwsworth (1 site 250 dwellings), Brinsley (1 site – 110 dwellings), and Kimberley (1 site – part Green Belt -118 dwellings). The approach is consistent with the sequential approach set out in Policy 2 of the ACS which policy also sets out an approximate breakdown of housing proposed for the Key Settlements all of which have Green Belt boundaries. In the case of Kimberley where our clients land interest is located, up to 600 dwellings are proposed in the ACS although Table 3 in the Part 2 Local plan already pares this back to 532 dwellings a reduction of more than 10%. We consider this reduction to be unjustified.

Our overriding concern lies also with achieving overall delivery of the housing numbers for Kimberley from the allocated sites and other deliverable urban sites within the Key Settlement of Kimberley and this matter will be covered in our response to and participation in Matter 9 Policy 7 which is programmed to precede this Green Belt session on Green Belt review. It is our view that delivery of the trajectory is uncertain, likely to be ineffective and thus unsound.

It is the respondents view arising from their assessment of the sources of housing delivery (for Matter 9) that Kimberley is under provided against the Core Strategy figures and that 1 or 2 additional sites need to be released around the edge of the settlement to meet this shortfall, insure against under delivery and bring the Part 2 Local Plan back into alignment with the Core Strategy. We estimate that further sites in Kimberley for between 100 and 150 dwellings should be identified to make the delivery trajectory effective.

With a tightly drawn Green Belt around Kimberley (and the other Key Settlements in Broxtowe) modest additional Green Belt release is required and indeed supported in development plan policy terms. Survey work has been undertaken by the Council and this exercise does identify additional locations in Kimberley where Green Belt release would not compromise the essential purposes of Green Belt which includes the respondents landholding north of Alma Hill which the previous Broxtowe Local Plan Inspector specifically acknowledged as *'a small site of little value to the purposes of the Green Belt'*.

It is acknowledged that it is not the role of this Inspector to identify specific omission sites for inclusion in the plan, yet if she finds the delivery trajectory to be unsound both in quantum of houses proposed for Kimberley and deliverability of the trajectory with currently allocated sites, then she can be assured that further Green Belt release is consistent with the NPPF, NPPG and Policy 2 of the ACS. Moreover, there are sites which are available in Kimberley, already in the public domain through the public consultation processes and listed in the SHLAA 2017/2018 as 'could be suitable if (Green Belt) policy changes, that could be included as allocations as modifications to the local plan. Release of one or more of these sites (which includes the respondents landholding north of Alma Hill – SHLAA 113) could address the overall under-provision of housing for Kimberley against the ACS target and under delivery or failed delivery of one or more of the allocated sites which appears a highly possible scenario to be discussed at the Kimberley sites session under Matter 9.

b) Development in the Green Belt

2. Does Policy 8 make appropriate provision for the protection of the Green Belt in line with national policy? Specifically is part 3) of the policy justified and consistent with the NPPF?

We consider that the clarification and the positive intent to deliver health and well-being benefits of changes of use of open land for outdoor sport and outdoor recreation purposes, subject to site by site assessment of the effects on openness should be supported. The Green Belt is tightly drawn in parts of Nottinghamshire and (in our view) entirely reasonable recreational proposals should not be summarily dismissed through rigid interpretation of paragraph 145 of the NPPF.



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