

BROXTOWE LOCAL PLAN**EXAMINATION IN PUBLIC****Response to Inspector's Matters, Issues and Questions
Made on Behalf of White Hills Park Federation Trust****MATTER 11 – Green Belt****Preamble**

- 11.1 This Hearing Statement is made on behalf of White Hills Park Federation Trust ('our Client'), in advance of making verbal representations to the Examination in Public into the Broxtowe Local Plan.
- 11.2 Our Client has a land interest at east of Coventry Lane in Bramcote ('the Site') which is allocated under Policy 3.3. Our Client is committed to delivering the Site.
- 11.3 Our response to the relevant questions in relation to Matter 11 are found below. We have had specific regard to the tests of soundness outlined in the National Planning Policy Framework ('the Framework'); namely that for the policies of the Local Plan to be sound, they need to be justified, effective, positively planned and consistent with national policy.
- 11.4 A Statement of Common Ground (SoCG) has been entered into between our Client and Broxtowe Borough Council and should be read alongside this Hearing Statement.

ISSUE: Is the approach taken to review and protect the Green Belt justified, effective and consistent with national policy in the NPPF.

(a) Site Allocations in the Green Belt**1. Is the Green Belt review consistent with national policy in the NPPF and PPG and with the sequential approach set down in Policy 2 of the ACS?**

- 11.5 The Green Belt review is consistent with national policy and with the sequential approach set down in Policy 2 of the ACS.

National Policy

- 11.6 The NPPF supports the release of Green Belt land for development through the production and/or review of a Local Plan. Green Belt boundaries should only be altered where

exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans.

- 11.7 Exceptional circumstances for releasing land from the Green Belt have been demonstrated.
- 11.8 The adopted Local Plan identifies that insufficient land exists outside of the Green Belt to deliver the levels of homes required over the Plan Period. This together with the needs of the district and the benefits of new homes demonstrate the exceptional circumstances to release land from the Green Belt.
- 11.9 Exceptional circumstances have also been demonstrated in the case of our Client's Site, which is identified as being one of the best performing sites in the SA.
- 11.10 The release of the Site would not prejudice or conflict with the purposes of the Green Belt as demonstrated by the assessment of the Site against the five purposes.
- 11.11 The NPPF sets out the five purposes the Green Belt serves. These are:
- To check the unrestricted sprawl of large built-up areas;
 - To prevent neighbouring towns merging into one another;
 - To assist in safeguarding the countryside from encroachment;
 - To preserve the setting and special character of historic towns; and
 - To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 11.12 When reviewing Green Belt boundaries, national policy also requires that the need to promote sustainable patterns of development should be taken into account. Additionally, when defining Green Belt boundaries, the NPPF requires that local planning authorities should *inter alia*:
- Not include land which it is unnecessary to keep permanently open;
 - Be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period; and
 - Define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.

11.13 The first part of the Green Belt review consists of reviewing broad areas using Assessment Criteria based on the five purposes of the Green Belt as set out in the NPPF. Each broad area is graded when assessed against the five purposes which then results in areas either being carried forward for further assessment or removed from the review if it is of high Green Belt importance.

11.14 The second part of the Green Belt review seeks to maintain the most significant strategic gaps, and in particular, locations outside of the main built up area; and seeks to follow defensible Green Belt boundaries. Within each zone identified for potential removal from the Green Belt, specific sites are assessed.

Policy 2 of the ACS

11.15 The ACS commits to releasing parts of the Green Belt for development in order to meet the housing needs of the Borough and the wider Nottingham conurbation. Policy 2 of the ACS sets out a sequential approach to accommodating growth, which is as follows:

- The main built up area of Nottingham;
- Adjacent to the Sub-Regional Centre of Huckall; and
- Key Settlements identified for growth.
- In other settlements, development will be for local needs only.

11.16 To ensure consistency with the adopted Spatial Strategy, the Sustainability Appraisal applies the following approach to assessing sites:

1. Sites within the urban area are considered to be sustainable;
2. Sites adjacent to an urban area are considered as a 'reasonable alternative'; and
3. Sites not adjoining an urban area are not considered.

11.17 Sites are then assessed against the objectives within the Sustainability Appraisal and on Green Belt and delivery issues.

11.18 The majority of Sites are identified within the main built-up area, with additional delivery within Awsworth, Brinsley, Eastwood and Kimberley which are all identified as key settlements identified for growth. This is consistent with the approach set out within Policy 2 of the ACS.

Land east of Coventry Lane, Bramcote – Consistency with National Policy and ACS

- 11.19 The Green Belt review assesses a number of 'Zones' which score lower than our Client's Site (i.e. less important in Green Belt terms). However, a number of these Zones are either not situated within the identified areas for growth within the main urban area or are unsuitable for other reasons. For example, Zone 31 is situated within an identified area for growth and scores 8 against the Green Belt assessment however is identified as being unavailable.
- 11.20 Our Client's Site is assessed as possessing strong and clear defensible boundaries and it does not play an important role in achieving the five purposes of the Green Belt. It is within the main urban area and is one of the best performing sites in the Sustainability Appraisal. Its inclusion is fully justified and consistent with national planning policy and Policy 2 of the ACS.

(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?

- 11.21 Our client does not wish to make written comments on this question.