



Matter 11 – Green Belt

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 PPGs and with the sequential approach set down in Policy 2 of the ACS?
 - 1.1 Our comments primarily relate to the Green Belt boundary as it is proposed at the Strategic Location for Growth at Toton. It is clear from the ACS that a review of the Green Belt to facilitate the SLG is in accordance with the NPPF as confirmed by the Inspector's report.
 - 1.2 The extent of the SLG and hence the revised green belt boundary is shown on Map 7. Peveril is generally supportive of the extent of Green Belt release as a response to the ACS. However, in one respect there is a missed opportunity to exclude a relatively small area of land from the Green Belt – ie that in the northern part of the Map 7 area, including the Japanese Water Garden, Bardills Garden Centre and other land (including an existing attenuation pond) which is likely to be enclosed by proposed new road infrastructure. This is shown on the revised growth boundary plan attached.
 - 1.3 Paragraph 139 of the NPPF states:

"When defining green belt boundaries, plans should:

 - *Be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period"*
 - 1.4 The Council is promoting a more radical transformation of the existing highway infrastructure in the locality. The plan on Page 36 of the East Midlands HS2 Growth Strategy (Examination document HS2/06), which forms part of the evidence to the Part 2 shows the provision of highway infrastructure. The new road construction will result in the isolation of land, outside of the SLG boundaries but within the green belt.
 - 1.5 The Council is supporting a HIF bid to construct the highway infrastructure and any allocated funding will have to be spend without delay. The bid is due to be submitted in December 2018. If successful these works would be constructed and completed by 2023 irrespective of HS2. The infrastructure will sever existing businesses. If this area was released from the Green Belt

now, and included within the SLG, it would enable a more comprehensive approach. The green belt boundary should be revised now and be consistent with advice within paragraph 139 of the NPPF. The outer eastern route should form the new physical, readily recognisable and permanent boundary of the green belt.

1.6 Notwithstanding the above Paragraph 145 sets out the exceptions to 'inappropriate development' and bullet point 7 states:

- *limited infilling or the partial or complete redevelopment of previously developed sites, whether redundant or in continuing use (excluding temporary buildings), which would*
- *not have a greater impact on the openness of the Green Belt than the existing development; and*

1.7 Within the proposed land to be excluded, is the Japanese Water Garden Site, located immediately adjacent the proposed northern boundary to the SCL on the eastern side of Toton Lane. It contains a number of retail units which have been established for many together with the glasshouse nurseries. There is also Bardills Garden Centre. Other land is excluded within the road lines including an attenuation pond.

1.8 Certain elements of this land could be described as 'previously developed'. Whilst their redevelopment could be assessed against bullet point 7 of paragraph 145, in the interests of co-ordinated development the sites should be excluded from the Green Belt now and the boundary revised (Plan 1). In the case of the Japanese Water Garden, it is located within the Green Belt and the associated car park is located within the SLG and outside the Green Belt. There are two planning designations across the single planning unit; this not helpful. Furthermore, it is inconsistent with advice as set out in paragraphs 139 and 145.

1.9 Policy 2 seeks to deliver sustainable development through urban concentration with regeneration. Broxtowe is a Green Belt authority and recognised early in the plan making process that to achieve this there would need to be a relaxation in the green belt boundary, particularly around the built-up areas of the Nottingham Conurbation.

1.10 The adopted ACS identified sites within the Green Belt which should be released to deliver the necessary housing and employment growth. This is entirely consistent with the strategy set out in Policy 2.

1.11 The Strategic Location for Growth at Toton is identified at Policy 2 3 a (iii) and an area of 75 hectare on Page 149 of Appendix A of the ACS.

1.12 The Inspector to the Aligned Core Strategy in her letter dated 24th July 2014 stated at paragraph 70:

" . . . However, the Toton location has good sustainability credentials for new development , whether or not HS2 goes ahead, being in the south of the Borough and adjoining the main built up area of Nottingham. It is within walking distance of the new tram terminus and park and ride facilities."

1.13 In paragraph 71 she went on to state:

"The submitted ACS referred to an "Appropriate mix of development" at Toton but did not indicate how much housing, employment or other uses would be sought. This was unsound, being vague, and inconsistent with positive planning."

1.14 Inspector Kingaby was clear that the SLG at Toton is a highly sustainable location and its development is consistent with Policy 2.

1.15 For the Part 2 Plan to be consistent with National Green Belt Policy, the Green Belt boundary should be revised to exclude all of the land required to complete the projected infrastructure as set out in HS2/06 and the HIF bid. We attach a Concept Master Plan (Plan 2) providing for an increased SLG that releases land within the proposed highway infrastructure from the green belt.

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?

2.1 No comments

Plan 1 – Revised Growth Boundary Plan.

Legend

- Council's Proposed Growth Boundary
- Additional land to be excluded from Green Belt



Urban &
Landscape
Design

Project title:

Toton East, Peveril Homes

Drawing title:

Revised Growth Boundary

Dwg N^o: A099277_03

Rev: C

Drawn: RR Checked: AC

Date: 16/11/18

Scale: 1:10,000 @ A3



Plan 2 – Concept Master Plan

Legend

- Strategic Growth Area Boundary
- Strategic Roads
- Proposed Residential Parcels
- Public Right Of Way
- Net Line
- Pedestrian Cycle Connections
- Chetwynd Route/Corridor
- Approved Local Centre
- Proposed Employment Area
- Proposed Mixed Use
- Proposed School
- Existing Tree Group/Tree
- Existing Land Use
- Hs2 Station
- Hs2 Station Concourse



Project title:

Toton East, Peveril Homes

Drawing title:

Concept Masterplan

Dwg N°: A099277_02

Rev: C

Drawn: HH Checked: AC

Date: 15/11/18

Scale: 1:10,000 @ A3

