

Green Belt Assessment Framework - Report of Responses

1. A consultation took place on an updated Assessment Framework for undertaking Green Belt review, between 14th August and 12th September 2025. The consultation was led by Gedling Borough Council on behalf of Broxtowe Borough Council, Nottingham City Council and Rushcliffe Borough Council. Ashfield District Council and Newark and Sherwood District Council contributed to the joint methodology but did not consult on the Assessment Framework due to the stage of preparation of their local plans. Ashfield District Council and Newark and Sherwood District Council will consider Green Belt matters as part of the development of their new local plans.

Purpose of consultation

2. National planning policy requires Councils to review the Green Belt. The Assessment Framework has been prepared to guide Green Belt review for the four authorities. Each of the four councils will undertake a Green Belt review at an appropriate time to inform preparation of their local plans and based on a more detailed methodology informed by local circumstances.
3. A Green Belt review does not itself determine whether or not land remains or is included in the Green Belt. It is the role of the council's emerging local plan to formally revise Green Belt boundaries and to allocate land for development, having taken into account all relevant planning considerations. This includes whether there are, in the first instance, exceptional circumstances for altering existing boundaries.

Comments received

4. Comments were received from 39 organisations or individuals, comprising five from statutory consultees, 13 from parish councils or neighbourhood forums, 17 from developers/landowners and four from local residents (including three ward members).
5. The comments received have been carefully considered. Where appropriate, amendments have been made to the Assessment Framework as outlined in red in the right hand column of the table below.

Final Assessment Framework

6. The Final Assessment Framework will be published by each participating Council.

Draft Green Belt Assessment Framework - Report of Responses			
From	Comment	Response	Action
Statutory consultees			
The Coal Authority	No comments.	Noted	No change to Assessment Framework.
Environment Agency	No comments.	Noted	No change to Assessment Framework.
NHS Nottingham & Nottinghamshire IBC	Thank you for consulting with NHS Nottingham & Nottinghamshire IBC on the Green Belt Assessment Framework for South Nottinghamshire, we have read the consultation documents and have no comments to make from a health perspective at this stage.	Noted	No change to Assessment Framework.
Natural England	No comments. The lack of comment from Natural England should not be interpreted as a statement that there are no impacts on the natural environment. Other bodies and individuals may wish to make comments that might help the Local Planning Authority (LPA) to fully take account of any environmental risks and opportunities relating to this document.	Noted	No change to Assessment Framework.
Historic England	The table under paragraph 5.12 refers to <i>other heritage assets of archaeological interest which are demonstrably of equivalent significance to a scheduled monument defined by local authorities</i>. Historic England recommends that '<i>defined by local authorities</i>' is removed from the draft framework text as it could result in assessment work as part of a Plan's evidence base which does not meet the requirements for the historic environment set out in Chapter 16 of the NPPF, including footnote 75. 5.12. Paragraph 5.15 refers to the need for further assessment in the decision making process to identify grey belt land, we would recommend that this is also considered in the assessment stages of the Plan review in general. For example, through any Strategic Housing and Employment Land Availability Appraisal, Sustainability Appraisal work and specific site assessment work for the draft Plan. The assessment approach set out in Historic England's Advice Note 3 (HEAN3) should be of use to your considerations https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/ .	Noted. The detailed information would not be available as part of the Green Belt assessment and would only be available once a planning application has been submitted and the implications of a specific proposal can be assessed.	Delete '<i>defined by local authorities</i>' from the table under paragraph 5.12. No change to Assessment Framework.
Parish councils			
Awsworth Parish Council	APC acknowledge that this consultation is essentially a technical matter. However, we consider it extremely important to draw attention to Awsworth's perspective and local circumstances at this initial stage. Local context information provided, covering a wide range of factors including planning policy context, previous Green Belt reviews, support for joint working on evidence documents, support for more detailed local methodologies, identification of constraints as set out in Neighbourhood Plan, impact of development at Bennerley, Note that 'towns' are to be defined by each Council - APC would contend that Awsworth as a defined Key Settlement constitutes a 'town' for Green Belt purposes and review. APC note that para 3.2 lists the five Green Belt purposes by means of bullets. NPPF para 143 and para 4.5 of the consultation document both refer to	Noted. Agree.	No change to Assessment Framework. Change bullets in paragraph 3.2 to letters.

	Green Belt purposes by means of letters (a) to (e) contained in brackets. Should be consistent. Support for the overall approach set out in Section 5, including the two stage approach. Recognise importance of consistency reviews (parag 5.2). Support the illustrative features for purpose (c) and the approach to purpose (e). Support approach to identification of broad areas. APC also support the approach at para 5.6, that unless a broad area is screened out, smaller sites will then be assessed. Support the reasons for screening out a broad area. Supports the approach to evaluating assessment areas under Step 2. Step 4 – consider that reaching a full conclusion on the impact of the footnote 7 designations can only be made once more detailed specific proposals are known is an important proviso. Step 5 – considers this step would apply to the Harworth site put forward for employment use. Considers Step 6 including parag 5.18 to be a reasonable approach.	Support welcomed.	No change to Assessment Framework.
Calverton Parish Council	A – Consultation Given the importance of Green Belt local residents should have been given the opportunity to make representations on the methodology. B – Overall Approach It should not be necessary to review the Green Belt Boundary each time a Local Plan is reviewed. Note NPPF identifies meeting housing requirement can constitute an exceptional circumstance to review Green Belt boundary but caveated by a pre-requisite exercise as outlined in para 147 of the NPPF which requires all reasonable alternative have been examined and whether maximised use of brownfield sites; optimised development density; informed by discussions with neighbouring authorities over accommodating some of the need. C – Error in ref to footnote 7 of NPPF concerning areas at risk of flooding. Table in para 5.13 defines these areas as within flood zones 2 and 3 however the footnote implies inclusion of flood risk from all sources incl pluvial, groundwater or reservoirs and methodology should reflect this. D – Methodology Step 4 Not appropriate to identify Grey Belt through the Green Belt Assessment. Advice in PPG is very detailed which should be best undertaken when a planning application is determined. Identifying provisional Grey Belt will raise the profile in areas not selected for Green Belt release. An unintended consequence that could undermine the spatial strategy.	A – Whilst comments were specifically invited from local authorities, parish councils, duty to co-operate bodies and developers/landowners, local residents were not precluded from submitting comments. For GBC, there will be an opportunity to comment on the outcome of the Green Belt review when the evidence document is published alongside the publication draft local plan. B – Paragraph 1.3 of the Assessment Framework refers to the 2024 NPPF which states that local authorities are expected to produce a Green Belt assessment in order to identify grey belt land and as part of the review of Green Belt boundaries during the preparation or updating of a local plan. Paragraph 1.4 of the Assessment Framework states that ‘any release of land from the Green Belt would need to demonstrate exceptional circumstances, this is the subject of consideration in separate documents’. C – Footnote 7 refers to ‘areas at risk of flooding’. Agree that this could be widened to include other sources of flooding. D - Para 148 of the NPPF states that ‘where it is necessary to release Green Belt land for development, plans should give priority to previously developed land, then consider grey belt which is not previously developed, and then other Green Belt locations’. It is	No change to Assessment Framework. Amend table to refer to surface water flooding Map – Flood map for planning – GOV.UK No change to Assessment Framework.

	E – Methodology Step 5 applying only to the release of large sites is inappropriate and should form part of the assessment for the release of sites of any size. PPG on reviewing Grey Belt notes that such an assessment against overall Green Belt purposes should be undertaken for sites of any size and should be incorporated into the assessment process.	therefore necessary to identify Grey Belt through the Green Belt Assessment for the purposes of plan preparation. See also the response to B above. Identifying provisional grey belt where appropriate at the plan preparation stage enables a firm decision to be made through the decision-making process when consideration can be given to the impact of the proposed development on the area/asset once more detailed specific proposals are known and the scope for any mitigation. E - Para 008 of the PPG states that a Green Belt assessment should also consider the extent to which the release of Green Belt land would fundamentally undermine the purposes (taken together) of the remaining Green Belt across the plan area as whole. It is not entirely clear how this requirement should be interpreted and the approach taken by the Assessment Framework represents our understanding at this time. There is an opportunity to take a different approach if our understanding is shown to be incorrect.	
East Bridgford Parish Council	Assessment Framework provides a less than adequate methodology for producing comparative scores. Out of the five criteria, item C in Appendix 2, has the briefest description of how to score its impact when it is arguably the most important criterion. In addition, all of the criteria have an equal scoring maximum so it is likely that an overall total will be skewed, sometimes on marginal definitions.	Descriptions reflect PPG. Purpose (c) is only used to score Green Belt and not to identify grey belt. There is no justification to score some purposes higher than others. However, parag 5.18 notes that account should be taken where a site is particular important for one Green Belt purpose.	No change to Assessment Framework.
Gotham Parish Council	Gotham Parish Council feel that in the proposal, there has not been enough emphasis on the continued protection of designated local green spaces as defined in planning documents such as Gotham's Neighbourhood Plan. We feel that locally designated green spaces should not even be assessed when looking at areas of land that could possibly be reassigned to become Grey Belt or to be taken out of the Green Belt.	Local green space is a separate designation to Green Belt and grey belt and is outside the scope of this Assessment Framework. Make clearer – identifying Ind as LGS	No change to Assessment Framework.
Keyworth Parish Council	Note paragraph 5.15 regarding provisional grey belt and unclear if the 'decision making process' refers to planning applications, green belt review or the creation of a local plan. Should be confirmed before an application is received. Unclear of the implications of defining towns. Concerned that the approach no longer appears to refer to the coalescence of settlements.	Refers to the planning application process as it is only at this stage when detailed proposals are known. The definition of towns is important in determining how strongly a site/area accords with purpose (b), in accordance with the PPG.	No change to Assessment Framework.
St Albans Parish Council	Paragraph 4.2 should be amended to state that the SHLAA failure to use built up area (i.e. identifying suitable sites for high-rise buildings) is not a justification to use green belt land and cannot constitute an exceptional circumstance under paragraph 145 of the NPPF. I expect that failure to follow the above is likely to result in legal challenges to the framework.	The purpose of the Assessment Framework is to set out an approach to Green Belt review and not to determine whether or not land remains or is included in the Green Belt. It is the role of the council's emerging local plan to formally revise Green Belt boundaries and to allocate land for development, having taken into account all relevant planning considerations.	No change to Assessment Framework.

		Paragraph 1.4 of the Assessment Framework states that 'any release of land from the Green Belt would need to demonstrate exceptional circumstances, this is the subject of consideration in separate documents'.	
East Leake Parish Council	If existing Green Belt land is to be released for development, we would like to see a commitment to the creation of new Green Belt elsewhere, so overall level of protected land is not diminished.	Noted. This is a matter for plan preparation and is outside the scope of this Framework.	No change to Assessment Framework.
Burton Joyce Parish Council	Greenbelt should only be released in exceptional circumstances – we would wish to see concrete evidence of the 'exceptional circumstances' which require the need to build on green belt in this area (1.4). Once an area is no longer designated as green belt, it will be lost forever. Turning green belt to grey belt on the western side of Burton Joyce will inevitably result in it becoming merged with the urban area of Netherfield and Carlton and losing its important village identity. If the fundamental aim of Green Belt policy is to prevent urban sprawl, building here would be going against this government policy aim (3.1) Similarly it would conflict with the aim of preventing neighbouring towns from merging with one another. The special character of the village should be maintained, and this includes having large areas of open countryside. 'Historic towns' are included in the proposed assessment, but not historic villages. Most areas in green belt areas are in villages (5.10) Protection of wildlife and natural habitats is not included as an 'area of importance'. There are deer and a rich variety of birds and wildlife in the Gedling area. (5.12) The increased risk of flooding resulting from building on green spaces cannot be emphasised strongly enough. Burton Joyce and other nearby villages have already suffered badly as a consequence of developments on flood plains and hillsides. This should be a high priority in any assessment matrix.	Outside of the scope of the Assessment Framework and covered by the NPPF. This is a matter for site selection work to support local plan preparation. PPG is clear that the definition of historic towns specifically excludes villages. The table under paragraph 5.12 reflects footnote 7 of the PPG. Protection of wildlife and natural habitats will be addressed through local plan preparation and the determination of planning applications. Risk of flooding will continue to be addressed through local plan preparation and the determination of planning applications.	No change to Assessment Framework.
Radcliffe on Trent Parish Council	Request that the Assessment Framework gives equal weight to historic villages and towns.	PPG is clear that the definition of historic towns specifically excludes villages.	No change to Assessment Framework.
Urban Imprint for Tollerton Parish Council	Question whether recycling of previous documents is appropriate, with new requirements tacked on. Limited guidance as to how the initial identification of broad areas and smaller areas will be undertaken. Draft Assessment Framework is silent on the approach to villages. Additional guidance needed on identification of land as provisional grey belt land.	The Assessment Framework follows the approach set out in PPG but also rolls forward the approach taken in the 2015 guidance where more detail is needed. Reference to other historic documents are included for completeness. 2015 methodology provides likely approach, rather than 2026 Nottingham-Derby Green Belt Review. Approach reflects PPG which does not allow for the merging of villages with one another. Clarify – does allow (doesn't restrict) Paragraph 5.15 is clear that, for plan making, provisional grey belt will be defined only if a footnote 7	No change to Assessment Framework.

		designation partially or fully impacts on an area.	
Wysall & Thorpe Parish Council	No comment.	Noted.	No change to Assessment Framework.
Chetwynd: The Toton & Chilwell Neighbourhood Forum	1) Should define what “<u>strongly</u> contribute” means and provide a numerical value. 2) Should define “Lower scores” in terms of where green belt land may be considered as grey belt and where it states “may score particularly highly for one single Green Belt purpose” is this 3 or 5? 1) & 2) In conclusion, by specifying and defining numerical values, the framework assessment matrix will be more meaningful and less open to subjective interpretation. 3) It would seem that purpose e contributes nothing to the overall scoring and should be removed from the matrix as it adds no value. Green belt land should be protected if it has an overall moderate score (numerical value to be defined). Even if it does not strongly contribute (to be defined as above) to an individual purpose a) to d).	The Assessment Matrix sets out the grading system. The Framework clearly sets out the process for identifying grey belt. In terms of where a site may score particularly highly for one purpose, each site will be considered on it’s merits. Balance needed between objective and subjective assessment. Included for the sake of completeness. The Assessment Framework needs to accord with the NPPF and PPG.	No change to Assessment Framework.
Developers/landowners			
Langridge Homes	Existing evidence is up to date and concludes that the majority of land adjoining the MBUA and key settlements in GBC is of low to moderate value. Given changes to Green Belt policy in the NPPF and PPG, likely that this land will meet the definition of Grey Belt and/or can be released from the Green Belt. Also, within these locations there are very limited protected areas or assets of particular importance (as per footnote 7) Section 3 of the Assessment Framework refers to paragraphs 143, 145 and 149 of the NPPF. Reference should also be made to paragraphs 22 and 110 (and also 115) Section 3 of the Assessment Framework should include reference to the GNSP Spatial Strategy, which GBC has signed up to. With regards to section 5, the evaluation of areas to be assessed should focus on sites which have been identified as reasonable alternative site allocations through the SHLAA process, rather than sub dividing these into smaller parcels.	The conclusions will be known once the review has been undertaken. For GBC, there will be an opportunity to comment on the outcome of the Green Belt review when the evidence document is published alongside the publication draft local plan. Paragraph 22 refers to the strategy for the area. The purpose of the Assessment Framework is to set out an approach to Green Belt review and not to determine whether or not land remains or is included in the Green Belt. Paragraphs 110 (and also 115) directs significant development to be focussed on locations which are or can be made sustainable through limiting the need to travel and offering a genuine choice of transport modes. For GBC, a separate ‘Grey Belt Position Statement’ has been prepared which includes a definition of sustainable locations. The Assessment Framework at ‘Step 1’ continues the two stage approach, which enables the consideration of both broad areas and smaller sites. Paragraph 5.6 (b) states that specific sites identified through the SHLAA will be assessed based on a minimum size threshold of 0.5 hectares or 10 dwellings.	No change to Assessment Framework.
Mark Jackson Planning (instructed by WC Martin Trust, promoters of sites off Steeles	Para 5.5 - The Council may wish to add the wording landscape and townscape features: The <i>boundaries of these broad areas will be chosen using Ordnance Survey maps, topographical maps, aerial photographs, <u>landscape and townscape features</u> and professional judgment.</i>	The text refers to the sources of information which will be referred to in order to consider assessment areas, rather than features on the ground.	No change to Assessment Framework.

Way/Orchard Rise and Catfoot Lane, Lambley references 6/672, 6/831 and 6/1035 within GBC)	Para 5.14 - Under Grey Belt, then the Council should take account of the weight to be given to grey belt and previously developed land, reference Paragraph: 014 Reference ID: 64-014-20250225.	This comment relates to the weight to be given to grey belt and previously developed land in decision making. The text in paragraph 5.14 refers solely to the identification of grey belt land. The weight to be given is then considered through the decision making or plan preparation processes taking into account all relevant planning considerations.	
PMC Land and Planning Ltd on behalf of Alexandra Blue (Cotgrave) Ltd	Scoring system for the existing Green Belt Assessment overstated the sites (Cotgrave Wood) contribution to greenbelt and that there are reasons for it to be considered for release as detailed in attached Submission Statement.	Noted	No change to Assessment Framework.
Marrons on behalf of Davidsons Developments Limited	Framework refers to 2105 framework and 2025 PPG, without reviewing the relevance of the historic documents. Unclear how consistency reviews can be undertaken if more detailed methodologies are prepared by individual councils. Step 1. Criteria for selecting broad areas are subjective and proposal to screen out broad areas is fundamentally unsound. Step 2. Concerns with definition of large built up areas and towns. Prejudges local plans by assuming key settlements will be treated as towns. Footnote 7 – no explanation as to the level of assessment that will be applied. Should not be applied to broad areas. Grave concerns regarding paragraph 5.15 which suggests its impossible to conclude that land is grey belt through plan making process.	The Assessment Framework follows the approach set out in PPG but also rolls forward the approach taken in the 2015 guidance where more detail is needed. Reference to other historic documents are included for completeness. The Assessment Matrix reflects the PPG. Consistency reviews will ensure that the broad Framework is being implemented consistently, albeit that key terms may be defined differently for individual authorities. Broad areas likely to reflect 2015 methodology. It is anticipated that few areas would be screened out at the broad area stage, in light of the requirement to ensure that Green Belt assessment is sufficiently granular. In advance of confirming definitions through local plan preparation, it is considered helpful to define these terms for the purposes of Green Belt review which must be undertaken to support the preparation of the local plan. Paragraph 5.15 is clear that provisional grey belt will be defined only if a footnote 7 designation partially or fully impacts on an area.	No change to Assessment Framework.
Marrons on behalf of Farm Partnership for Peter Hammond	Framework refers to 2105 framework and 2025 PPG, without reviewing the relevance of the historic documents. Unclear how consistency reviews can be undertaken if more detailed methodologies are prepared by individual councils. Step 1. Criteria for selecting broad areas are subjective and proposal to screen out broad areas is fundamentally unsound.	The Assessment Framework follows the approach set out in PPG but also rolls forward the approach taken in the 2015 guidance where more detail is needed. Reference to other historic documents are included for completeness. The Assessment Matrix reflects the PPG. Consistency reviews will ensure that the broad Framework is being implemented consistently, albeit that key terms may be defined differently for individual authorities. Broad areas likely to reflect 2015 methodology. It is anticipated that few areas would be screened out at the broad area stage, in light of the	No change to Assessment Framework.

	Step 2. Concerns with definition of large built up areas and towns. Prejudges local plans by assuming key settlements will be treated as towns. Footnote 7 – no explanation as to the level of assessment that will be applied. Should not be applied to broad areas. Grave concerns regarding paragraph 5.15 which suggests its impossible to conclude that land is grey belt through plan making process.	requirement to ensure that Green Belt assessment is sufficiently granular. In advance of confirming definitions through local plan preparation, it is considered helpful to define these terms for the purposes of Green Belt review which must be undertaken to support the preparation of the local plan. Paragraph 5.15 is clear that provisional grey belt will be defined only if a footnote 7 designation partially or fully impacts on an area.	
Cerda Planning on behalf of William Davis Homes	Comments relate to site at Chapel Lane, Ravenshead. Step 1 – support two-step process. However, extent of 'broad areas' should ensure swathes of land are not discounted where only part has a constraint. Council should acknowledge need to release more land to be able to meet the identified housing need. Step 2 – Require a framework/criteria for establishing what constitutes a town/village which should be used consistently across the authority areas. Step 3 – agree the areas/assets of importance that are identified as applicable to the local authority areas is reasonable. Step 4 – identification of grey belt land is supported. The term 'strongly' can be interpreted with a degree of subjectivity even when applying some of the criteria when set out in the Assessment Matrix at Appendix 2. Notwithstanding, supportive of the 'strong' contribution illustrative features currently set out. Support identification of provisional grey belt land allowing for positive engagement with stakeholders to identify how any designations can be avoided/mitigated. Step 5 – Council have not provided a methodology for this step. Note definition, which is welcomed but there should not be further opportunity to reconsider this definition. Step 6 – Support approach that if land which is not identified as grey belt will be further assessed against purposes (c) and (e) in accordance with the Assessment Matrix.	Consideration can be given through implementation of Assessment Framework. The Assessment Framework will inform Green Belt reviews. Site selection will be undertaken as part of the preparation of local plans. A matter for each council to consider in the context of paragraph 5.10. Noted. 'Strongly' is defined in Assessment Matrix which reflects PPG. GBC have prepared informal guidance which defines key terms. Noted. Applies to very large sites so will need to be considered on a case by case basis. Support welcomed.	No change to Assessment Framework.
Turley on behalf of Taylor Wimpey UK Limited	The two stage approach contracts the PPG which states at para 004 that all Green Belt areas within plan areas should be considered in the first instance. Recognises that, for sustainability reasons, sites for development more likely to be located around settlement edges but sustainability dependent on many factors. Two stage approach allows for broad areas to be screened out. Guidance around settlement hierarchy and definitions do not go far enough. Towns and historic towns	Agree that this would reflect the guidance in paragraph 004 of the PPG. It is anticipated that few areas would be screened out at the broad area stage, in light of the requirement to ensure that Green Belt assessment is sufficiently granular. Paragraph 5.10 of the Assessment Framework sets out a likely approach for defining towns, albeit	Add text to paragraph 5.4 to read 'In identifying assessment areas, consideration will be given to all Green Belt within the plan area in the first instance'. No change to Assessment Framework.

	should be clarified so consistent. Villages should not be defined as towns or large built up areas. The Framework should list, or set criteria. Grading system for assessing the contribution to purpose (c) which only comes into play at step 6. Should also consider extent of urbanising influence, countryside character, presence of urban fringe uses, types of edges/boundaries,	that final definitions will be for individual authorities. Detailed guidance on the assessment of purpose (c) is not covered by the PPG and as such the approach taken by the 2015 Framework has been carried forward.	
Stantec on behalf of Bloor Homes	Paragraph 4.4 of the Assessment Framework refers to paragraph 148 of the NPPF and reference should be included to the Government's response to the consultation which recognised the need to balance low quality Green Belt with sustainable development. Paragraph 4.7 should quote paragraph 1 of the guidance in full. Two approaches to assessing smaller sites are suggested. The second approach based on SHLAA sites is supported. Paragraph 5.5 refers to broad areas should similarly reflect SHLAA sites. Bloor Homes does not object to the definition of towns in Paragraph 5.10 but notes there are key settlements (eg Ravenshead) that are villages. The assessment matrix should not conflate key settlements which are villages with towns. Paragraph 146 of the NPPF should be included as context in clarifying what constitutes exceptional circumstances.	Noted. This is a matter for plan preparation and is outside the scope of this Framework. The paragraph quotes the opening section to paragraph 1 of the PPG in full. Noted. Broad areas are likely to be larger than SHLAA sites, reflecting the approach taken to the 2015 methodology. Notes support for paragraph 5.10. Paragraph 4.6 refers but no need to provide more detail in this document.	No change to Assessment Framework.
RG+P on behalf of Midlands Land Portfolio Limited (Severn Trent)	Promotion of land at Stoke Lane, Burton Joyce and Teal Close, Stoke Bardolph which are not considered high value parcels when considered against the purposes of including land within the green belt. Para 1.2 suggests that the methodology will be developed in an adhoc manner with no mechanism for consultation on any subsequent changes. Para 5.5 - unclear how professional judgement will be used to determine broad areas to avoid subjective interpretation. Para 5.6(b) – unclear how Councils will use SHLAA submissions, in particular where site boundaries are wider than areas proposed for development. Account should be taken of masterplan submissions. Para 5.9 – exclusion of purpose (c) not explained. Para 5.17 – assessment focus is on quantum of inappropriate development within a parcel without reflecting landform, topography and landscape character designations.	It is appropriate that the Framework is interpreted to reflect local circumstances for each authority and this approach reflects the 2015 methodology. In practice, approach likely to reflect the 2015 methodology. The Assessment Framework will inform Green Belt reviews. Site selection will be undertaken as part of the preparation of local plans. Consideration of purposes reflects PPG. Approach reflects 2015 methodology.	No change to Assessment Framework.
Lichfields on behalf of Redrow Homes Midlands	Welcome the consistent approach. Step 1 - Redrow is broadly supportive of the approach to identifying areas to be assessed, but has concerns in relation to the effect of 'screening out' broad areas in some circumstances.	Noted. It is anticipated that few areas would be screened out at the broad area stage, in light of the requirement to ensure that Green Belt assessment is sufficiently granular.	No change to Assessment Framework.

	Step 2 – broadly supportive of the Council’s proposed Framework approach in Step 2, Redrow has two particular concerns - treating all Sub-Regional Centres and Towns as ‘Large Built Up Areas’ and Key Settlements/Main Urban Areas as ‘Towns’ for the purposes of assessing parcels against Purposes A and B of the Green Belt. The PPG is clear that villages should not be considered large built up areas” (PPG ID: 64-005). Care should be given in considering whether settlements across the South Nottinghamshire area could be considered a ‘large built up areas’. Office for National Statistics suggests that a large built up area would be considered a large town, with a population of c.75,000-199,999. Redrow accepts that Nottingham should be considered a large built up area, but not all Key Settlements should be considered Towns. The definition should be based on the population, amenities and the level of economic activity. Step 5 - Redrow strongly supports the thresholds of 2000 dwellings. The wider Derby-Nottingham Green Belt comprises c.59,910 hectares of Green Belt land, and it is highly unlikely that smaller parcels of land would materially impact the remaining Green Belt land within a plan area.	For each local authority to determine. Support welcomed.	
Pegasus on behalf of Bloor Homes East Midlands	In relation to land off Toton North, Broxtowe. The Assessment Framework should define towns and not leave this to local authorities to decide, for consistency. Assessments should be externally scrutinised, over and above by adjoining authorities. Assessments should support Regulation 18 consultations, ahead of formal Regulation 19 consultations.	Paragraph 5.10 of the Assessment Framework sets out a likely approach for defining towns, albeit that final definitions will be for individual authorities. Noted. For GBC, the PPG was published too late to inform the Regulation 18 consultation.	No change to Assessment Framework.
Define Planning and Design on behalf of Bloor Homes Limited	It is important for the Green Belt Assessment (GBA) to recognise that there may also be exceptional circumstances to justify the release of “non grey belt” land within the Green Belt. The intention of the two stage approach is understood, but the sifting exercise should not discount smaller sites that themselves do not make a strong contribution to the purposes of the Green Belt and could be developed. Therefore, advocate the removal of stage 1 of the process. If not then suggest that Stage 1 could focus solely on areas that are in no way related to the existing built form, public transport hubs or corridors. The GBA Framework is correct to assess sites that have been promoted through the Strategic Housing Land Availability Assessment (SHLAA). Authorities should publish a map of existing sites and undertake a call for sites. The GBA should only account for the Nottingham conurbation in assessing purpose A and should not include standalone towns and sub-regional centres. The PPG reiterates that Purpose B is relevant only to towns, and not villages. The definition of “towns” as “key settlements” and “Main Urban Areas”, as defined by the extant / emerging local plan would not align with PPG or recent case law. Factors should include	Paragraph 1.4 of the Assessment Framework states that ‘any release of land from the Green Belt would need to demonstrate exceptional circumstances, this is the subject of consideration in separate documents’. It is anticipated that few areas would be screened out at the broad area stage, in light of the requirement to ensure that Green Belt assessment is sufficiently granular. For each council to consider. For each council to consider. For each council to consider.	No change to Assessment Framework.

	consideration of population (with a figure of 7,500 residents referred to in the House of Commons' "City and Town Classification of Constituencies and Local Authorities" research briefing), and the facilities and amenities on offer. Consideration should also be given to whether it refers to itself as a village, has a village council, has a village hall, has an adopted village design statement, etc. The PPG was less clear in relation to the definition of a "historic town", stating only that this should not include historic villages (as has been reflected in the GBA Framework), and that Councils should define historic towns themselves. The absence of any qualifying criteria suggests that being a "historic town" is a high bar, and the PPG notes that there will be circumstances where there are no historic towns within a plan area. With regard to the assessment of Purposes A, B and D, the GBA Framework replicates the PPG verbatim. At this stage, therefore, BHL has no comments in that regard. The key matter will be how the authorities apply that methodology. The GBA Framework presents an oversimplified Methodology for applying footnote 7 that is inconsistent with the NPPF, PPG and subsequent appeal decisions which have reiterated that development should not be restricted simply because an asset covers a site or is in proximity to it, but needs to provide a strong reason for refusal. BHL question whether the GBA is the appropriate place for such a consideration. It is, therefore, much more appropriate for the GBA to defer those considerations to more detailed site assessments. That aligns with the PPG, which allows GBAs to "<i>provisionally identify</i>" grey belt land. BHL supports step 5. However, the illustrative features that have been suggested in relation to Purpose C are over-simplified. The GBA suggests that the only consideration in this regard is the presence of inappropriate development but the assessment should also consider the character of the site, the presence of urbanising features and the sense of enclosure provided by the built form or existing man-made and landscape features, amongst other factors.	Noted. Noted. The suggested approach already reflects the Assessment Framework. Detailed guidance on the assessment of purpose (c) is not covered by the PPG and as such the approach taken by the 2015 Framework has been carried forward.	
Carney Sweeney on behalf of Whyburn Consortium	Unclear from paragraphs 1.2 and 5.2 as to the status of the document for ADC and N&S. Unclear how consistency reviews will be conducted. Step 1 - paragraph 5.4 should clarify that all Green Belt within plan areas will be considered in the first instance.	Both ADC and N&S have been involved with the preparation of the Assessment Framework but have not consulted on it at the present time. Can only be undertaken at the stage at which a council has prepared a draft Green Belt assessment. Reviews will be undertaken with adjoining authorities who have already undertaken their Green Belt assessments. Agree that this would reflect the guidance in paragraph 004 of the PPG.	No change to Assessment Framework. Add text to paragraph 5.4 to read 'In identifying assessment areas, consideration will be given to all Green Belt within the plan area in the first instance'.

	Step 1 – paragraph 5.6 should refer to the use of site visits to identify broad areas. Step 2 – paragraph 5.10 includes definitions. The PPG is clear that villages should not be considered large built up area and villages are distinct from villages. Reference is made to the Ashfield Local Plan but Ashfield are not a consulting authority. Step 5 – refers to paragraph 003 of the guidance which refers to assessment areas rather than a scale of development. Step 6 refers to scoring of 1/3/5, but no value for 2 and 4 thereby allowing for local interpretation.	Site visits may be used to inform professional judgment. Individual authorities will need to define these terms in the context of both the Assessment Framework and the PPG. Ashfield will consult on the Framework at a future date. The PPG reference is to the development of the assessment area and as such the threshold in paragraph 5.16 is appropriate. The scoring system allows for a more refined assessment. It is not considered necessary to provide further guidance at this stage.	No change to Assessment Framework.
Carney Sweeney on behalf of Peveril Securities & Omnivale Pension Scheme	Unclear how consistency reviews will be conducted. Step 1 - paragraph 5.4 should clarify that all Green Belt within plan areas will be considered in the first instance. Step 1 – paragraph 5.6 should refer to the use of site visits to identify broad areas. Step 2 – paragraph 5.10 includes definitions which differ from those in paragraph 005 of the PPG. Step 5 – refers to paragraph 003 of the guidance which refers to assessment areas rather than a scale of development. Step 6 refers to scoring of 1/3/5, but no value for 2 and 4 thereby allowing for local interpretation.	Can only be undertaken at the stage at which a council has prepared a draft Green Belt assessment. Reviews will be undertaken with adjoining authorities who have already undertaken their Green Belt assessments. Agree that this would reflect the guidance in paragraph 004 of the PPG. Site visits may be used to inform professional judgment. Paragraph 5.10 sets out how the terms will defined in the context of the PPG. The PPG reference is to the development of the assessment area and as such the threshold in paragraph 5.16 is appropriate. The scoring system allows for a more refined assessment. It is not considered necessary to provide further guidance at this stage.	No change to Assessment Framework. Add text to paragraph 5.4 to read 'In identifying assessment areas, consideration will be given to all Green Belt within the plan area in the first instance'. No change to Assessment Framework.
Twenty5 on behalf of Parker Strategic Land Ltd and William Davis Homes (relating to land at Catstone Green, Broxtowe)	For step 1, the Framework lacks transparency on the criteria used to define 'Broad Areas' and the rationale for subdivision. For step 3, application of Footnote 7 is considered misplaced and should only be applied with regard to Grey Belt assessment. For step 5, the 2,000 unit threshold appears arbitrary and should instead reflect spatial context, landscape sensitivity and cumulative impact, not fixed numerical thresholds. For step 6, it is unclear what additional assessment this entails.	Framework notes that can be refined further by individual authorities at time that review is undertaken. Step 3 reflects PPG and it is agreed that it should only be applied with regard to Grey Belt assessment. There are likely to be few occasions where step 5 is needed and this threshold is suggested as an indication but can be further refined by individual authorities. Paragraphs 5.17 and 5.18 are clear. In that non-grey belt will be further assessed against (c) and (e) in accordance with the Assessment Matrix and a score applied.	No change to Assessment Framework.
Aldergate Properties	Object to the assessment as it seems to go beyond Guidance (flood zones for example) and seems unnecessary.	The table under paragraph 5.12 sets out how the footnote 7 designations will be defined.	No change to Assessment Framework.

Planning and Design Group (UK) Limited	Object to the threshold of 0.5 hectares or 10 dwellings and above which is inconsistent with national policy and guidance. Councils should not rely on historic SHLAA submissions.	The primary purpose of identifying grey belt as part of a Green Belt assessment is to support site selection work to identify housing allocations. Sites below this threshold would be too small to allocate. The same Framework could be used on a site by site basis to inform determination of planning applications. For each authority to determine. Most councils update SHLAAs annually.	No change to Assessment Framework.
Local residents			
Three ward members for Leake Ward	Purpose (a) Terms like “reasonable proximity” and “near to” are not defined in document and guidance needed, especially as judgements are context dependent. Purpose(b) it is questioned to what extent is the separation of “towns” that is considered as separation between a “town” and a smaller settlement or large industrial area should also be relevant. Purpose (c) Areas that are free of development are to be given greatest priority in assessments under this purpose but is counter intuitive as open countryside in such areas contributes all the more to the Green Belt purposes because there is less of it and is more important. Purpose (e) is to prioritise previously land for development by discouraging the use of green belt land - on the assumption that green belt land is undeveloped and urban land is developed? Definition of “urban” is perhaps key. NPPF 77(e) does not appear to be referenced and could be important. “consider whether it is appropriate to establish Green Belt around or adjoining new developments of significant size”. Where green belt land adjacent to the urban area is developed it may be necessary to extend green belt outwards to maintain purpose of Green Belt in that area. (nb ref NPPF 144). Assessment should include not just consideration of Green Belt strength of areas but potential extensions to Green Belt because of land removed from Green Belt for development. This is not included in any of steps 1-6 and could be added as step 7.	Precise definitions are a matter for individual authorities. GBC have prepared a ‘Grey Belt Position Statement’ which defines key terms. The methodology set out in the Assessment Matrix reflects the 2015 methodology. It is considered that all land in the Green Belt assists in urban regeneration to the same extent and therefore no illustrative features are proposed to distinguish between the values of various sites/locations. This is a matter for individual authorities to consider. The remit of the Assessment Framework is to assess existing Green Belt.	No change to Assessment Framework.
Mark Trought, local resident	As presently worded, the process is biased in favour of removing land from the greenbelt. For example: If an area of greenbelt moderately contributes to purposes (a), (b) & (d) but contributes strongly to purposes (c) & (e), with the present step 4, it will be moved to greybelt. Step 6 will not be applied to this area as it will already have been classified as grey belt. Either the reasons for moving land to greybelt should include purposes (c) & (e) or an additional step (similar to step 6) is required to test whether an area which has been assessed as grey belt in step 4 can be "returned" to greenbelt status by including purposes (c) and (e).	The methodology reflects PPG and the Assessment Framework must be prepared in this context.	No change to Assessment Framework.
Karen Bannochie, local resident	This consultation should have been given broader publicity amongst affected residents to allow for considered and timely responses.	Whilst comments were specifically invited from local authorities, parish councils, duty to co-operate bodies and developers/landowners, local residents were not precluded from submitting comments.	No change to Assessment Framework.

	Certain villages including East Bridgford, Kingston on Soar and Cropwell Bishop have been allocated Broad Areas which are disproportionate to the size of the existing villages. In the case of East Bridgford, it is currently being treated to sizeable development. It is a mistake to state that the earmarked 'broad area' for East Bridgford is out of any eyeline. Any building there will be massively obtrusive. I assume 'the significant pockets of inappropriate development between the A46 and the Fosse Road' refers to the petrol stations and vastly over-sized East Bridgford Garden Centre. If development is unstoppable thanks to NPPF, our countryside cannot be left in the hands of developers to shape how it is built. The reasons for that are all around us.	The Assessment Framework will inform Green Belt reviews. Site selection will be undertaken as part of the preparation of local plans. The assessments of broad areas will be revisited in accordance with the Assessment Framework. Site selection will be undertaken as part of the preparation of local plans which will also include policies on design.	
Anne Tebbs (local resident)	The document contains no definition of grey belt and a local definition should be agreed and defined in the glossary appendix. Para 2.5 The document should explain rationale or criteria for defining important/or less important. Was this solely for preventing urban sprawl between two cities? Do not agree that the only purpose (even from a planning perspective) of green belt is simply to prevent urban sprawl. Para 3.2 As Gedling is predominantly made up of villages then villages should also be included in the definition of towns to protect (some) green belt between villages. Para 3.4 Process for identifying safeguarded land should be defined in this document. Can there be a means to identify land of rich ecological value as safeguarded? Can it be changed once identified? How is this reviewed? Para 4.2 The housing needs assessment should reflect an understanding of the type of housing required and ensure developments meet this need. Para 4.5 In Gedling we need to go beyond assessing sites for irreplaceable habitat and seek to assess sites for their richness of biodiversity and their ecological value and role in fighting the effects of climate change through natural resources. The definition of grey belt should be included in the glossary and should quantify "does not strongly contribute to". Para 4.6 This document should define the expectations around consultation with the public to any changes in green belt boundaries. Para 5.10 "Towns" should be defined in Gedling as including villages. Para 5.12 How are local green spaces identified? What consultation is required in Gedling with the public to identify local green spaces. The appendix to this document should include agreed local green spaces and there should be an opportunity for the community to identify other local green spaces of importance. Para 5.16 Do not agree. This step should be undertaken at the point that any green belt is released for development, regardless of size and should include assessment of value by local people as well as ecological importance and biodiversity.	The Assessment Framework sets out a clear methodology for defining grey belt in accordance with the NPPF and PPG. For GBC, a separate 'Grey Belt Position Statement' has been prepared which defines key terms, eg towns. Covered by NPPF and will be considered through plan preparation. This is outside the remit of the Green Belt Assessment Framework. Agree that the NPPF definition of grey belt should be added to the glossary. Changes to boundaries can only be made through local plan preparation which includes consultation. See above. Local green space is a separate designation to Green Belt and grey belt and is outside the scope of this Assessment Framework. Covered by GBC as part of the recent consultation on the Issues and Options stage of the Gedling Local Development Plan. Step 5 reflects PPG.	No change to Assessment Framework. Add NPPF definition of grey belt to the glossary. No change to Assessment Framework.