

Greater Nottingham - Broxtowe Borough, Gedling Borough and Nottingham City Aligned Core Strategies Publication Version June 2012

Response of **Linby Parish Council & Papplewick Parish Council** to
Inspector's Matters, Issues and Questions

MATTER 3: THE GREEN BELT (Q. 3 & 4)

Background

- .1 The representations made here, which build on earlier representations made to the Broxtowe Borough, Gedling Borough and Nottingham City Aligned Core Strategies on behalf of Linby Parish Council & Papplewick Parish Council ("the Parish Councils") are made specifically in respect of the policies and proposals relating to Gedling Borough, unless otherwise stated.

Question 3

Response

- .2 The substantive part of the Top Wighay Farm site and all of the land North of Papplewick Lane are not currently within the Green Belt by virtue that they comprise "safeguarded land" in the extant Gedling Borough Replacement Local Plan. The sites were "safeguarded" from development during the plan period to only ever be developed as a last resort. The term used by the Local Plan Inspector was that they would act as a "safety valve".
- .3 It is considered that there is substantive evidence from detailed assessments of Green Belt, which reveals serious flaws in the proposed allocation of these two SUE sites *per se* and their continued exclusion from the Green Belt. In the opinion of the Parish Councils, the sites should not be developed and they should be reintroduced back into the Green Belt.
- .4 The NPPF provides guidance in respect of Green Belts at paragraphs 79 to 92. We are informed that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open [79]. Within this context, paragraph 80 of the NPPF sets out the five purposes that Green Belts serve. These include: to prevent neighbouring towns from 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.
- .5 The spatial vision of the ACS¹ (as carried forward into Policy 3 (Green Belt)) states that the principle of the Green Belt is to remain and it will continue to shape new development, especially with regard to its key purposes. Future Development Plan

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Documents will review the Green Belt boundaries to meet other development land requirements, including the two SUE sites at Top Wighay Farm and land North of Papplewick Lane.

- .6 In the case of Linby and Papplewick, both villages are currently washed over by the Green Belt and it would appear to be the policy of GBC to continue this designation in the future. However, whilst this will provide the necessary protection for the historic villages of Linby and Papplewick in themselves, the substantial SUEs planned at Top Wighay Farm and land North of Papplewick Lane would extend the urban area of Hucknall to within a hair's breadth of the villages. The proposed allocations are entirely contrary to the fundamental aim of Green Belt policy and the purposes it serves.
- .7 The findings of a review of the Nottingham-Derby Green Belt were published in August 2006 in a document entitled '*Nottingham-Derby Green Belt Review*'. The document does not appear to form part of the examination library core documents. The review was undertaken in light of the substantial growth that had been identified for the East Midlands and so in effect the review was propagated by the need to release land from the Green Belt to accommodate growth.
- .8 For the purposes of the Green Belt review, the two SUE sites at Top Wighay Farm and land North of Papplewick Lane lay within Area 6, identified as 'North of Eastwood, Kimberley and Hucknall'. Whilst the review was somewhat "broad brush", the review recognised that there is pressure to expand the various settlements in this area and the Green Belt helps safeguard the countryside from encroachment. There are some green infrastructure resources, including areas of Ancient Woodland, a number of SSSIs and areas of mature landscape that are visually prominent. The overall assessment of this area of Green Belt was HIGH with its most important function being to check the unrestricted sprawl of large built-up areas.
- .9 Interestingly, within the section entitled 'Strategic Green Belt Issues', the review made reference to the housing and employment land allocation at Top Wighay Farm, as follows: -

'A major extension of Hucknall is provided for in Gedling Borough at Top Wighay Farm. Some of this land is allocated for housing and employment, while the rest is safeguarded for future development requirements. The safeguarded land extends to the Ashfield boundary on the west north of current Hucknall limits. Expansion of Top Wighay to the east is limited by a current desire to keep Linby (an historic village) as a separate area washed over by the green belt.' [Para 154]
- .10 The evidence before the examination suggests that the sites do perform an important function in Green Belt terms, which would be harmed by their development.

Question 4

Response

- .11 It would appear that there has been no consideration given to the continued use of existing safeguarded land policies in Gedling. The ACS approaches the safeguarded sites at Top Wighay Farm and land North of Papplewick Lane as though they were both existing development allocations, simply to be carried forward as such into the ACS. This approach is not only inaccurate but it fails to take account of the function and purpose of safeguarded land.
- .12 The NPPF (para. 85) makes it clear that safeguarded land is not allocated for development. The Inspector who presided over the public examination into the extant Gedling Local Plan had this to say regarding the Council's safeguarding policy:
- “The first thing I have to say about a policy to control development in areas of Safeguarded Land is that in my view it is very definitely not a housing policy. I say this for three reasons. First, its purpose is to control (and prevent) permanent development during the plan period. Second, it is not a foregone conclusion that all (or any) Safeguarded Land will need to be developed – that will depend on the need to find greenfield land for development in future Local Plan reviews. And third, even if development does eventually take place, it may not be housing.”*
- .13 The ACS should be clearer about its approach to safeguarded land. There is undoubtedly a risk that safeguarding could provide an escape from debates on impact and mitigation and this risk is, to some extent, borne out by the positive allocation of Top Wighay Farm and land North of Papplewick Lane as priority sites for development.
- .14 The Parish Councils are of the opinion that the respective Councils should give consideration to the use of safeguarded land policies but that the two SUE sites in Gedling should be reintroduced back into Green Belt as they do not comprise sustainable development and their development runs counter to the spatial strategy of urban concentration with regeneration.

Relevant hearing session: Week 1 – Thursday 17th October: Day 3 (10am)²

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² Examination hearing session as per draft programme dated 22 August 2013