

Response Form

Your Details		Agent details (where applicable)
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1. Green Belt Review Part 2 (b): Proposed insets for washed over villages

Do you consider the methodology for identifying the inset village Green Belt boundaries is appropriate (page 7 of the review)? If you do not, please state how the methodology for new inset boundaries could be improved.

Yes

(please continue on a separate sheet if necessary)

2. Green Belt Review Part 2 (b): Proposed insets for washed over villages

Do you agree or disagree with the suggested inset boundaries for the settlements currently washed over? If you disagree, state why the boundary is incorrect and where the new boundary should be. Your comment should focus on the contribution the land makes to the openness of the Green Belt, long term permanence and the presence of recognisable defensible boundaries.

This proposal is not about which sites should be released from the green belt and which should be protected no matter what, but to explore possibilities to build on a tiny proportion of the most environmentally degraded parts of the green belt to address what is a national housing crisis, without having any significant adverse effect on the five purposes of the green belt around our villages.

(please continue on a separate sheet if necessary)

3. Green Belt Review Part 2 (b): Minor Amendments to Existing Boundaries

Do you consider the methodology for identifying minor amendments appropriate (pages 19 to 20 of the review)? If you do not, please state how the methodology for minor amendments could be improved.

Yes providing it is in keeping with The Framework Paragraph 85 - when defining boundaries local planning authorities should use physical features that are readily recognisable and likely to be permanent

(please continue on a separate sheet if necessary)

4. Green Belt Review Part 2 (b): Minor Amendments to Existing Boundaries

Do you agree or disagree with the suggested minor amendments to existing settlement boundaries? If you disagree, please identify which minor amendment is incorrect and state why and how the minor amendment should be changed. This should be based on the contribution the land makes to the openness of the Green Belt, long term permanence and the presence of recognisable defensible boundaries.

Agree

(please continue on a separate sheet if necessary)

5. Green Belt Review Part 2 (b): Key Settlement Review

Do you consider the methodology for assessing land around Rushcliffe's Key Settlements against the purposes for including land within the Green Belt is appropriate (pages 39 to 44 of the review)? If you do not, please state how the methodology could be improved.

Yes

(please continue on a separate sheet if necessary)

6. Green Belt Review Part 2 (b): Key Settlement Review

Do you agree or disagree with the assessment of Green Belt land around Rushcliffe's Key Settlements against the purposes for including land within the Green Belt (pages 44 to 148 of the review)? If you disagree, state why the assessment is incorrect and provide your Green Belt score and conclusions on Green Belt importance. Your comment should focus on the land's performance against Green Belt purposes.

It has been suggested, not all green belt land deserves the same level of protection, the we therefore believe a mixed-use scheme on the former Bunny Brick Works brownfield site, located in the washed over Bunny Green Belt, provides an opportunity for environmental improvement without adding to the impact on the openness of the green belt, a point the Framework seeks to promote. The Framework states that, applications should be determined in accordance with the development plan unless material considerations indicate otherwise.

In submitting an application for change of use to mixed use, we can demonstrate that economic benefits of a mixed use scheme are capable of amounting to 'very special circumstances' encouraging consideration to place a greater emphasis on the economic benefits for the wider area, thereby protecting greater value green belt land which provides significantly higher community benefit.

This response is not designed to argue the case to build on green belt sites with environmental value; rather, that scrubland industrial sites near urban links could be appropriate for development. Building on brownfield lesser quality land within a formal greenbelt would only have to be very modest to provide more than enough land for identified housing need and housing for generations to come, without having any significant adverse effect on the five purposes of the green belt around our villages.

It has been shown there is enough greenbelt land just within the confines of urban areas physically suitable to be released for development, while protecting our environmentally and amenity-rich areas more rigorously. Such development would reduce pressure to build on urban green spaces, improve the quality of housing and allow more workers to live closer to employment centres, reducing commuter times and carbon emissions.

Guidance provided by the Framework states at Paragraph 79: that the Government attaches great importance to green belts and that the fundamental aim of green belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of green belts are their openness and permanence.

The Bunny Brick Works site cannot be regarded as either open or permanent; the brownfield site has planning

permission for industrial/commercial development, therefore at some future point it will be developed. The Framework at Paragraph 85 states that, when defining boundaries local planning authorities should use physical features that are readily recognisable and likely to be permanent. The Bunny Brick Works site is surrounded on all sides, located between a retail industrial site to the North, the recycling centre to the West, Gotham Lane and Loughborough Road, all of which form clearly defined boundaries, using physical features that are readily recognisable and are likely to be permanent.

When considering design and deciding whether there has been an adverse effect on amenity? Planning Guidance and Best *Practice Guidance* states, the definition of amenity is a matter of fact and degree, and advises the condition of the site, its impact on the surrounding area and the scope of solutions to tackle the problem will be important, to this end we believe a mixed use scheme provides scope to address a great number of amenity issues and will be guided by local preference, these may include a bus terminus, convenience store, medical care, elderly homes, employment etc.

The original object of establishing green belt boundaries, largely unchanged since 1947, was to discourage uncontrolled urban sprawl into the open countryside around our larger towns and cities and to prevent the coalescence of two or more large neighbouring towns. There can be no argument with that broad objective, however, the most prominent use of modern green belt is to stifle development.

Two undesirable elements have crept into green belt policies over the years:

First: green belts have been expanded to a far greater extent than was originally intended and to a far greater extent than is necessary to achieve their objective. For example, the Metropolitan green belt around London was intended to be about 12 to 15 miles deep, in some places it is now well over 30 miles deep. Our green belts now encompass huge areas of land that ought never to have been incorporated in them.

Second: is an undesirable element that has crept into green belt policy is the entirely unnecessary and inappropriate rigidity in the treatment of development proposals, which seeks to resist all development in the green belt unless either it is deemed to be 'appropriate' development or exceptional circumstances can be demonstrated. The knee-jerk reaction, both locally and nationally whenever any reform or relaxation of green belt policy is suggested, it must be challenged, have become accustomed to regard the green belt planning system as a useful tool for resisting change.

Green belt review notes contained in latest Planning Policy Guidance state:

Green belts seek boundaries to be clearly defined using readily recognisable features such as roads. It then goes on to draw distinctions between various types of road suggesting that only some types of road form strong boundaries, Gotham Lane and Loughborough Road form such a strong boundary around the Bunny Brick Works site

To sustain Rushcliffe Borough Council's housing and economic development needs, it is highly likely at some point, development outside settlement boundaries, probably virgin green belt land will be necessary. Therefore, clear benefits in meeting some of those housing and employment needs now, by the use of brownfield sites, and particular characteristics of the Bunny Brick Works site mean the totality of harm would be clearly outweighed by other considerations, and the very special circumstances necessary to justify development.

Green belt seems to be a form of discriminatory zoning, simply providing value for those who own houses within them, helping to turn houses into investment assets instead of places to live for the majority, not just the well-off few.

Finally, we should question the idea that green belts are environmentally-friendly, why? because they are mostly used for intensive farmland which generates negative or very low net environmental benefit, neither do they provide a social or amenity benefit, with "little or no public access to the majority of green belt land".

Urban parks and gardens provide far richer biodiversity, and has positively disproportionate benefits in terms of land area. Green space in urban areas provides environmental benefits for significantly greater numbers of local residents.

(please continue on a separate sheet if necessary)

7. Please provide any others comments you wish to make

(please continue on a separate sheet if necessary)

Signed:		Date:	
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Please return by **5pm on Thursday 24 March 2016** to: Planning Policy
Rushcliffe Borough Council
Civic Centre, Pavilion Road
West Bridgford
Nottingham. NG2 5FE
Or to: localdevelopment@rushcliffe.gov.uk

Please note that your comments can be directly entered through the Borough Council's online consultation system: <http://rushcliffe-consult.objective.co.uk/portal>

Data protection: The details you submit to the Borough Council will be used in the Local Plan preparation and associated processes. Please note that comments and personal details cannot be treated as confidential and may be made available for public inspection both physically and/or through the Borough Council's website. We may publish all names, addresses and comments received, including on our website. We will use our best endeavours to not publish signatures, personal telephone numbers or email addresses.