



Rushcliffe Local Plan

**Rushcliffe Draft Green
Belt Review**

Report of consultation

November 2013

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1. Introduction

- 1.1 The Rushcliffe Publication Core Strategy was submitted for examination in October 2012. The Inspector raised concerns about the absence of a comprehensive Green Belt review in Rushcliffe, which was felt necessary to demonstrate that the Green Belt impacts of Local Plan proposals have been fully considered. An assessment of housing need required the identification of enough land to deliver at least 13,150 homes, further necessitating a Green Belt review.
- 1.2 A draft Rushcliffe Green Belt Review was subsequently prepared. It included the following main sections:
- Green Belt Review Stage 1 (a) Assessment of broad areas adjacent to Nottingham Principal Urban Area within Rushcliffe (pages 14-34 of the review)
 - Green Belt Review Stage 1 (b) Assessment of broad areas across the remainder of the Green Belt within Rushcliffe (pages 35-67 of the review)
 - Stage 2(a) Detailed review of Green Belt boundaries around the Principal Urban Area (PUA) and at regeneration sites beyond the Principal Urban Area at the former RAF Newton and at the former Cotgrave Colliery (pages 68-104 of the review).
- 1.3 The draft Green Belt Review was consulted on between Monday 17 June and Friday 9 August 2013. All those on the Council's planning policy consultation database (which includes members of the public and various bodies) and parish councils were specifically informed about the consultation. Details of the consultation were also made available online.
- 1.4 In total, 583 individuals or organisations submitted comments. This report provides a summary of the comments made. It then goes on to set out, as best as possible, where consultees have made specific suggested modifications to the Green Belt Review. Where relevant, a Council response is provided. In response to some of the comments made, changes have then been made to the final version of the Green Belt Review.

2. Green Belt Review Stage 1(a) – summary of comments

Below is a summary of comments from the public consultation that relate most specifically to the following question:

Do you agree or disagree with the approach and findings of the broad assessment of the Green Belt purposes around the Nottingham built-up area within Rushcliffe?

If you have any observations on the approach or the assessment results then please state these clearly, together with suggested changes.

Scoring system

- Scoring system must be independent of housing need or proposed allocations.
- Appears the Green Belt assessment has been determined against three pre- determined major sites to be allocated new housing (Plumtree Parish Council)
- The scores for Green Belt importance for zones around Tollerton are too low for urban sprawl, coalescence, safeguarding the countryside from encroachment and historic setting. Not all areas of Green Belt reviewed at the same level of detail
- Land south of Clifton should be more appropriate for release than East of Gamston, due to clear boundaries and infrastructure, but not reflected in score (Plumtree Parish Council)

Agricultural quality

- Assessment does not take into account value of agricultural land South of Clifton (grade 2). South of Clifton scored too low in relation to checking unrestricted sprawl, preventing of merging towns (Gotham) and safeguarding the countryside from encroachment

Visual impact

- The area from which the development (south of Clifton) will be visible is comparatively large, due to the high ground and very open nature of the landscape. The visual impact of housing would be much easier to mitigate than large warehouse builds, although if housing has to be built at all, this should be on the lower part of the site. The area between such housing and the existing edge of Clifton should be developed as a recreational area. This is backed up by maps and block diagram

submitted to show the effects in detail (Ken Mafham obo Barton in Fabis Parish Council and Gotham Parish Council)

- Clifton area, which significantly understate the landscape impacts of development in this location and downplay the urban sprawl effects which would be self-evidently significant. (Mosaic Estates)

Alternative locations

- Ruddington has been protected at the expense of the impact on other settlements.
- An impartial review would not conclude that the area East of Gamston is more appropriate for release than the additional expansion to the west of Clifton- where there are cleared boundaries and infrastructure provision (NET, A453). The assessment scores Clifton Medium high and Gamston East only Medium. (Plumtree Parish Council)

Defensible boundaries

- Should have sustainable boundaries, the most appropriate being the ring road. Importance given to the ring road as a defensible boundary differs from the east to that in the south.
- Any boundary dividing Tollerton village from proposed housing developments to its north would come under steady pressure from developers.
- Hard to believe a row of pylons constitute a permanent defensible boundary
- Lings Bar a strong boundary which should not be 'leap-frogged'.
- A52 is a strong GB boundary, none of the alternatives mentioned in section Part 1(a) are as defensible. Of those mentioned the canal would be most defensible. Polser Brook is too insignificant. Little Lane does not extend far enough beyond Tollerton to secure openness of the GB, field boundaries can be redrawn too easily and farm tracks moved. (Tollerton PC).

The Green Belt Review

- The Green Belt is being reviewed too often
- Public should know who owns all the Green Belt land, and who will benefit from its sale.
- Government targets to maintain and increase the current area of Green Belt land
- 2006 GB review has formed a basis for the current review do not accept judgements of this

- Ease Green Belt boundary in small lots with sustainable areas, not one major reduction
- Seems unjustifiable to review only the part of the Nottingham- Derby which is in Rushcliffe
- The 2006 Green Belt Review ranked the area “South of West Bridgford to East Leake” as one of the most important areas of the Nottingham- Derby Green Belt
- RBC should have a Mature Landscape policy
- Does not meet NPPF para 17, 79 or 109.
- It is welcomed that the GBR incorporates the findings of the Nottingham- Derby Green Belt review and uses a similar methodology to assess more specific broad areas of the Green Belt in the Borough (Derbyshire County Council)
- Absence of a consideration of ‘safeguarded land’, without the full Green Belt review there is no clarity over where the ‘safeguarded land’ will be. (Gladman Developments)
- Planning permission has already been granted for development south of Edwalton, remove from Green Belt (Andrew Granger & Co)
- Do not believe that factors affecting the Green Belt status of areas in Rushcliffe are so different from such factors in other authorities that a review is required in Rushcliffe when no review is required in other authorities (TABU)
- Applying RBC’s methodology to small parcels of land, rather than the total area, will give different results (e.g. the number of boundaries adjoining built-up areas will be different as will coalescence considerations). For example, if zones 5.1 and 5.2 were considered together, the overall Green Belt score would be considerably higher
- Due to the influence of the existing and proposed highway network the area between the new and old A453 should be removed from the Green Belt (Clifton Landowners) (John Wells and Nottingham Airport plc)
- Consider that the conclusions of the Green Belt Review are broadly acceptable and support the increase in housing on land at Edwalton (Edwalton Consortium) (Bloor Homes)(Clifton Landowners)
- Stage 1(b) Assessment results for Ruddington supported (Andrew Granger & Co)

3. **Green Belt Review Stage 1(b) – summary of comments**

Below is a summary of comments from the public consultation that relate most specifically to the following question:

Do you agree or disagree with the approach and findings of the broad assessment of the Green Belt purposes around the remainder of the Green Belt within Rushcliffe? If you have any observations on the approach or the assessment results then please state these clearly, together with suggested changes.

- Sites around Cotgrave should be considered in addition to the Colliery - good transport links and a highly sustainable and self-contained location.
- Part of Stanton is immediately adjacent to Keyworth, should be reviewed in the same way, at the same time
- Key Settlements such as Keyworth should form part of the part of the Green Belt Review (Heaton Planning)
- Principal settlements outside of Green Belt - Bingham/ East Leake should be the focus of new housing (Plumtree PC)
- Leave Bassingfield washed over by the GB and Tollerton inset from the GB (Tollerton PC)
- Much-needed affordable housing could be facilitated in villages which RBC proposes to become or remain inset from the Green Belt. (CPRE)
- Agree that Barton in Fabis should remain washed over by the GB (Barton in Fabis Parish Council (BiF PC))
- Support the recommendations regarding the settlements which should remain inset from the Green Belt, in particular the recommendation that Cotgrave remains inset and subject to a full review (Langridge Homes)
- Bassingfield should not have the same protection as Tollerton and Ruddington (Havenwood Construction)
- Object to the proposal to remove Plumtree from the Green Belt and create an inset village, as it is a small rural settlement (Plumtree Parish Council)
- The issue of coalescence with the Tollerton Park settlement has been ignored.
- Agree in principle that Gotham should be inset from the Green Belt however a clear defensible boundary should be identified to prevent potential future coalescence of neighbouring settlements (specific boundary proposal set out in response). Revision should allow for some growth as settlement has employment and businesses within main core with further commercial businesses at the edge. Do not agree that growth should be confirmed to local needs. (BPB UK Ltd)

4. **Green Belt Review Stage 2(a) – summary of comments**

Below is a summary of comments from the public consultation that relate most specifically to the following question:

Do you agree or disagree with the approach and findings of the Green Belt purposes around the Nottingham built-up area within Rushcliffe and around the regeneration areas? If you have any observations on the approach or the assessment results then please state these clearly, together with suggested changes

- Significant risk of coalescence between Tollerton and the suggested site-review only seems to take account of coalescence of current villages but not the proposed ones
- There is scope for considerable development around Cotgrave- the disruption would be less than at Tollerton.
- Appear to be prime sites but would need adequate infrastructure support
- Should not treat these areas different to other brownfield sites within Green Belt
- A52 should be the boundary between West Bridgford and Ruddington, concerned that Green Belt review would remove land from areas of Ruddington
- Detailed review required at Cotgrave Colliery and Newton
- Boundary on Clifton Pastures should be established early on in planning.
- Independent assessment should be undertaken by consultants not directly employed by Rushcliffe to obtain a proper impartial assessment (Plumtree Parish Council)
- “The council wish to object to a change from washover to inset status for Bunny. They strongly feel it is insufficient to rely on the restricted conservation areas to prevent development and other factors such as need and sustainability” (Bunny Parish Council)
- Green Belt currently limits new sites near Cotgrave village centre that would be perfect to build on, which would have no detriment on the amenity of the village
- Support review of Green Belt around Cotgrave- not aware of any consultation when Green Belt was first created and not aware of any consultation since

5. Other observations to the Green Belt review

Below is a summary of comments from the public consultation that relate most specifically to the following question:

Do you have any other observations in relation to the Green Belt review?

- If the development crosses over Gamston Lings Bar, there is no clear defensible boundary to constrain development.
- Inspector said that the local plan should not be approved until the Green Belt review was complete, and the review should precede the choice of sites not the other way round.
- No thought as to the size of the development and number of homes and its impact on Tollerton- loss of village identity/ character, noise from traffic, potential crime issues from social housing.
- East Leake Parish Council would particularly oppose any release of land along the road between East Leake and Ridgeway and between Ridgeway and the main built up area of Gotham.
- East Leake Parish Council will wish to contribute to the discussions when inset boundaries are drawn up for Gotham and Bunny
- Loss of Green Belt between Clifton and Gotham is regrettable; replacement with an equivalent sized area to the south would alleviate this effect (though not for Gotham) – the decision not to extend the Green Belt should be re-examined.
- Developers currently leapfrog the Green Belt and put East Leake under pressure of new green field developments. Additional measures to preserve our rural setting and prevent coalescence would be welcomed i.e. establish 'green wedges' to maintain separation from West Leake and Costock, potentially also Rempstone and Stanford.
- Should the boundary change, the new boundary will have less defined limits- what is to stop the boundaries changing again?
- The presence of a 'willing landowner' should not be taken into account in the assessment.
- Should be no weighting of the importance of each criteria
- No definition of gradings 1-5
- The review also needs to consider the issue of Gypsy and Traveller site provision
- Strategic Housing Land Availability Assessment is too subjective
- Believe the issue of village identity is underestimated in Green Belt review

- Scoring system must be independent of housing need or proposed allocations. There is no weighting of the importance of each criteria
- Landscape South of Clifton is crucial to openness
- Mapping should include mature landscape areas and should consider topography
- Need to consider cumulative impact
- Flood risk in parts of Tollerton
- Should deal with Ruddington's Green Belt in the same consultation, given the critical gaps.
- Not a collaborative overall review between all Nottingham Councils, looking at all areas.
- East Leake needs some form of protection, expansion and risk of coalescence with Costock
- Bradmore Parish Council would like to retain the washed over status of the village. The Conservation Area does not cover the whole village and does not protect it as a whole.
- GB status outside of the PUA should not be subject to review, except to accommodate development at Cotgrave Colliery, RAF Newton. Need for a thorough assessment of the character of Cropwell Butler, particularly its openness (Cropwell Butler Parish Council).
- Agree that there is a need to define new inset boundaries to the village, and that the direction for growth should be to the northeast. And southeast to tidy the village boundary and avoid flood risk. Do not believe there are high levels of infrastructure capacity (Radcliffe Parish Council).
- In view of its 'sustainability' and 'Green Belt criteria' status, the identified land (presume at Adbolton as this is referred to earlier in the response) should be excluded from the Green Belt and redesignated as 'safeguarded land'. It is capable of development for education (e.g. Nottingham Emmanuel and Becket Schools off Wilford Lane) and other uses which may serve the Lady Bay community enhancing sustainability. (Nottinghamshire County Council Property)
- Disagree with conclusion to avoid west, north west, north and north east of Ruddington due to risk of coalescence with West Bridgford and Clifton (Andrew Granger & Co)
- Radcliffe on Trent - existing railway embankment to the west is a very clear, contained and permanent feature. The embankment will clearly limit development to the west, prevent sprawl, coalescence or impact on Holme Pierrepont Hall. (Mosaic Estates)
- Submission received from Capita Symonds assessing a site on Nottingham Road, Radcliffe on Trent against the NPPF Green Belt criteria. See rep for further details (Capita Symonds)

- Review should not be phased (see response to q1, in the consultation email response folder, consultee ID 761664 (Samworth Farms via Fisher German))
- A detailed representation is presented the consultation email response folder, consultee ID 778449. (Gladman Developments)

General methodology

Some respondents gave more general comments on the methodology undertaken in the draft Green Belt Review, as summarised below

- Findings may be flawed due to methodology applied. (Linden Homes)
- There are some inconsistencies in analysis and conclusions which should be amended. These inconsistencies are outlined in the Bloor Homes response and response from John A Wells and Nottingham Airport PLC in detail. (Bloor Homes) (John A Wells & Nottingham Airport PLC)
- Support the general methodology but have significant differences with the Council in the work that has been undertaken. 3 key elements to this which are set out in the response to the consultation document along with revised assessments (Havenwood Construction)
- The Council should not be deferring part 2(b) of the Green Belt review to a later stage. This assessment should form part of a full, comprehensive review, undertaken during the period when the Examination is suspended. A full comprehensive Green Belt review would inform the Core Strategy and provide a robust evidence base for distribution of the additional housing numbers. (Gladman Developments)
- The Stage 1(b) Assessment for Ruddington highlights that the Tribal Study recommends to 'avoid west, north west, north and north east [of Ruddington] due to risk of coalescence with West Bridgford and Clifton'. However this conclusion was drawn in relation to an exploration of the potential for major urban extensions in the areas between these settlements. We consider that this should not colour the judgement of potential for small urban extensions to the north of Ruddington, which could be accommodated with no implications for coalescence. (LHW Properties Ltd)
- We agree with the recommendations to leave Bassingfield washed over by the Green Belt and Tollerton inset from the Green Belt. (TABU)
- Rushcliffe use the NPPF criteria that distinguished Green Belt land from other land as the only assessment criteria. Ignores the value of the land itself eg as landscape and for agriculture. Rushcliffe uses no weighting in its scoring system nor provide any sensitivity analysis. (Gotham PC)
- The RBC score, which gives the Green Belt criteria a score out of 5 and then an overall total out of 25 does not give due weighting to individual

- criteria - suggests that the 5 Green Belt criteria cannot be mutually exclusive and are not individually important. (Mosaic Estates)
- Issue to be considered is how the residual Green Belt i.e. the areas that would remain should specific sites be taken out of the Green Belt perform in relation to the purposes. (Linden Homes)
 - NPPF requires LPAs to ensure consistency with sustainable development, this is not best met by making development needs part of the assessment criteria for the GBR – it is felt this is the case give that the NPPF refers to ‘identified’ requirements (para 85) – the requirements are still disputed so are not ‘identified’ currently. Also the NPPF definition of sustainable development includes the environmental side of sustainable development. (Tollerton PC)
 - The evidence from the 2007 East Midlands Regional Plan Panel Report is not relevant to this review – it was an integral part of the preparation of the RSS rather than evidence used in its preparation, also the judgement regarding the Green Belt was not even taken forward to later stages of the Regional Plan because LPAs in Greater Nottingham raised objections. (Tollerton PC)
 - 2006 review was an officer report, compiled within a different growth and economic context and was not subject to public consultation or examination. The Tribal studies were not in themselves a Green Belt review - took into account other potential constraints to identify potential directions for growth - not related to the Green Belt, and may be overcome. Should be used carefully to avoid excluding potential boundary reviews based on non-Green Belt issues. According to Table 2, ‘significant barriers to development’ will be considered as part of the review – this is wrong – only Green Belt factors should be taken into account, with other constraints being a further filter at allocation stage. (Mosaic Estates)
 - When and where will the re-defined Green Belt boundary be produced, as a result of the Green Belt review? Once produced this should be subject to further consultation. (Gladman Developments)
 - Review assumes that it has already been established that there are exceptional circumstances even though it is the remit of the Local Plan process to whether exceptional circumstances apply. Any review of the Green Belt should be based on the fundamental aim of the Green Belt as quoted above, measured against the five purposes. This should mean that no criteria other than these five purposes should be considered or given any weight in reaching any Green Belt Review recommendations. (TABU)
 - Would suggest that the second stage of the GB review including the Key Settlements needs to be brought forward and undertaken now. This will ensure that the first part of the Core Strategy is deliverable i.e. sufficient

land can be made available to accommodate the requisite numbers.

Response goes on to set out detail on specific sites in Radcliffe on Trent – SHLAA sites 183 and 184 (Trustees of Johnson Giltwood & Co)

- The 2010 study notes that East Leake is a very sustainable settlement beyond the Green Belt. The 2012 SHLAA identifies a number of sites that are suitable for development and is in excess of the 400 proposed in the submitted strategy. Whilst there is clearly a need for a Green Belt review to accommodate the greater proportion of the extra homes needed, the review should not expect to accommodate all of the additional housing, when there is capability in sustainable sites beyond the Green Belt. The Green Belt review is therefore going beyond what is necessary for a review of the Green Belt, by underestimating the role of the sustainable settlements beyond the Green Belt. (Redrow Homes)
- Review fails to address settlement and specific site potential at a level of detail which would allow for full analysis and meaningful recommendations relative to the growth potential of Ruddington (Andrew Granger & Co)
- Tollerton is not mentioned in “Overall Conclusions for Broad Area B – Rushcliffe Mid”.
- Separating allocation of planned housing starts from allocation of permission or resources to provide community/road infrastructure is worrying
- The GBR is a hurried exercise – the need for a systematic review of the Greater Nottingham GB as a whole is set out in the Regional Plan and recognised in the RBC review. It follows that distribution of housing should be reconsidered in light of this review. We are not aware that RBC has made any attempt to request other Districts carry out a GBR in their areas at this time. (BiF PC)
- Sceptical of results of Tribal Studies which were not subject to public consultation and therefore flawed. (BiF PC)
- We are asked to accept that there are no alternative sites in the SHLAA, we need to be provided with evidence for that – the SHLAA should be published and consulted upon, other Districts should also review their SHLAA and assumptions made on windfall sites, citing the Duty to Cooperate as reason to do this (BiF PC)
- Appraisal system should be revised – para 3.1 of response onwards (BiF PC) provides BiF PC assessment and subsequent results. Supporting evidence is expected from BiF PC by August 23rd (para 3.1.2)
- Prolonging the Green Belt review detrimental to delivery. Green Belt review should be a transparent process. It should be positively prepared, justified, effective and consistent with national policy. Gladman strongly recommend that the Council undertake stage 2(b) of the Green Belt review now. By deferring stage 2(b) to a later stage, and linked to the

difficult decisions that may need to be made, there is the real danger that part 2(b) may not be in place for a number of years (Gladman Developments).

- North of new A453 Alignment and River Trent corridor- the definition of this area is too broad. Fails to distinguish between land south and east of the existing A453 and the land north and west of it. Land to the south and east, between the new and old A453 clearly relates more closely to the built up area, is not at risk of flooding and does not have steep topographical features. Area between new and old A453 should be removed from Green Belt (Clifton landowners)
- In order to ensure that any new development maintains a degree of permanence, the new boundary at Gamston should not be drawn excessively tight to simply accommodate development to 2028 (Taylor Wimpey) The Taylor Wimpey response to the GBR goes on to outline reasoning why release of the site from the Green Belt is justified. A plan is attached to the response.
- No objection to general approach but no explanation given as to how the 6 areas came to be selected. Also no explanation as to how the outer boundaries of the areas were fixed, it is not accepted that the Assessments of Areas 3, 4 and 5 can be considered sound. Amended scores are suggested in the Havenwood response. (Havenwood)
- Review is supported but serious concerns re phased approach and limited areas to which the review is focussed. Large sites will not deliver the numbers per annum to meet housing requirement, additional smaller sites are needed therefore review around key settlements needs to be undertaken in parallel with review of PUA. It is suggested that the Green Belt around Cropwell Bishop and East of Radcliffe on Trent are reviewed and justification for this set out in the response (Samworth Farms via Fisher German).
- Approach to assessment of outer edge of Green Belt is in stark contrast extremely limited and wholly inadequate. 2006 review was strategic and does not provide sufficiently detailed assessment to inform GB policies of the CS. Outer edge was defined in 1989, significant changes have occurred since – a revised Green Belt boundary is justified on land at/around the former Station Hotel in Sutton Bonington. At this location, whilst land to the south of the road is covered by countryside policies, land to the north (which contains more built development) lies in Green Belt. The area contributes little to the 5 main purposes of the Green Belt and it is considered that the built up area, north of Station Road, should be removed from the Green Belt. The area North of Station Road is not open. This new Green Belt boundary would better reflect the 5 main purposes of Green Belt. (FFR B in F PC)

6. Comments on specific sections of the Green Belt Review

Consultee	Comment	RBC Response	Amend GBR
LHW Properties Limited	<p>Agree with the approach of the Stage 1(a) Assessment but disagree with some of the findings. Table 3, page 24 of the assessment identifies that land north and west of Ruddington is of medium-high importance to Green Belt purposes, mainly due to the potential for coalescence between Ruddington, Clifton and West Bridgford. Whilst we do not disagree with this assessment in terms of its focus on finding major areas for extension to the Principal Urban Area, we consider that it must not colour judgement in relation to potential urban extensions to the north of Ruddington.</p> <p>Plan F in Appendix 1, page 111 of the assessment includes a 'Critical Gap' annotation intended to indicate a sensitive area between Clifton and Ruddington where development may result in the coalescence of these settlements. Due to the 'dog leg' in the borough boundary at this point, the annotation has been carried over an area to the north of Ruddington that appears to include existing housing and previously developed land (SHLAA site 215). This is indicated by a red circle on the attached plan. It appears to us that this is a</p>	<p>Stage 1(a) is a broad assessment over the whole of area 3. As noted in the conclusion on area 3 the recommendation not to carry to entire area forward does not preclude part 2(b) of the assessment from identifying opportunities on the edge of Ruddington</p> <p>Site specific issues and detailed changes around Key Settlements in or adjacent to the Green Belt such as Ruddington will take place at a later date in support of the second part of the Local Plan – the Land and Planning Policies DPD.</p> <p>Part of SHLAA site 215 is within the Green Belt currently and therefore the Plan is correct.</p>	No change required.

Consultee	Comment	RBC Response	Amend GBR
	<p>mistake and surely is not intended to preclude development in SHLAA site 215, which, although in the Green Belt, is previously developed land which formed part of the Camelot Street Depot. We would request that it is amended.</p> <p>6th column of Table 3 states that proposals north of Ruddington would not assist in the recycling of derelict land. We would wish to draw to your attention that there is a site of approximately 1.2ha (SHLAA site 215) to the north of Ruddington, which formerly comprised part of the Camelot Street Depot. This is brownfield land and development of this land would assist urban regeneration by encouraging the recycling of derelict land.</p> <p>We agree with the conclusions of the Stage 1(b) Assessment for Ruddington, in that it provides for a full review of the Green Belt boundary of the settlement. We also agree with paragraph 4.31 in that there is potential for the Green Belt review to remove additional land from the Green Belt for longer term requirements.</p>		
Andrew Granger & Co	Disagree with conclusions of Sct 3 Part 1(a) – there is scope for creating a new permanent boundary to the west of Pasture Lane and south of Clifton Road to allow for modest scale of new	The Stage1 (a) assessment provides that the conclusions made at this stage do not rule out part 2(b) of the assessment from identifying potentially	No changes required.

Consultee	Comment	RBC Response	Amend GBR
	<p>housing. Also scope for a new boundary to the west of North Road Ruddington. Broad Location 3 – should not rule out part 2b of the assessment from identifying potentially suitable opportunities in Green Belt terms on the edge of Ruddington.</p> <p>Review fails to address settlement and specific site potential at a level of detail which would allow for full analysis and meaningful recommendations relative to the growth potential of Ruddington</p> <p>Support conclusions in respect of Zone 4.2. Zone 4.11 should be removed from the Green Belt to reflect the boundary created by the proposed exclusion of Zone 4.5, 4.1 and 5.3</p> <p>Stage 1(b) Assessment results for Ruddington supported</p> <p>Planning permission has already been granted for development south of Edwalton, remove from Green Belt.</p> <p>Disagree with conclusion to avoid west, north west, north and north east of Ruddington due to risk of coalescence with West Bridgford and Clifton.</p>	<p>suitable opportunities in Green Belt terms on the edge of Ruddington village itself.</p> <p>Site specific issues and detailed changes around Key Settlements in or adjacent to the Green Belt such as Ruddington will be dealt with through the Local Plan Part 2: Land and Planning Policies Development Plan Document (DPD).</p> <p>Zone 4.11 – It is considered that this site would be difficult to integrate with West Bridgford given its location; if further land was required for release in future beyond this plan period, this site could require further consideration.</p> <p>Conclusions re suitable directions for growth are derived from Tribal Study – Sustainable Locations for Growth Study which has been used to inform this review.</p>	

Consultee	Comment	RBC Response	Amend GBR
Ruddington Parish Council	<p>The final sentence of para. 4.14 raises concerns about opening the gates to possible coalescence, suggesting the possibility of changes to the Green belt on the edge of Ruddington. Risk of coalescence with the conurbation, developments in what is now the Green belt would be remote from village facilities.</p> <p>Support the recommendation in para. 5.16 to preserve Areas 4.9 and 4.10 as Green belt.</p> <p>Support the conclusion in the first two sentences of para. 4.14 not to carry Broad Location 3 forward (i.e. to retain it as Green belt).</p>	<p>Site specific issues and detailed changes around Key Settlements in or adjacent to the Green Belt such as Ruddington will be dealt with through the Land and Planning Policies DPD and these will be assessed against the 5 Green Belt purposes which include risk of coalescence.</p>	<p>No changes required.</p>
Miller Homes	<p>We agree with the directions for growth identified in the Sustainable Locations for Growth study in respect of Keyworth - sustainable settlement suitable for further growth; should remain inset from the Green Belt. Para 4.45 states that for villages recommended for a full Green Belt review, this will be carried out in the future 2(b) stage. This is delaying decision making and will result in uncertainty. The Core Strategy should be making clearer, specific conclusions. Where accepted that a review of boundaries is necessary, the Core Strategy should be setting a framework for the Land and Policies DPD based on the evidence by giving a clear steer for the direction of growth in</p>	<p>The Green Belt review is phased to reflect the phased approach to the Local Plan process. This approach was adopted given the advanced stage of the Core Strategy in order to ensure that the Core Strategy and, therefore, strategic site allocations can be adopted in as short a period time as possible. This is rather than beginning afresh on a Local Plan which, whilst this would incorporate non-strategic site allocations, would take a much longer period of time to produce and therefore</p>	<p>No change required.</p>

Consultee	Comment	RBC Response	Amend GBR
	such settlements.	<p>delay the adoption of a plan further.</p> <p>The concept of a 2 stage review process was debated at the Technical Meeting held with the Inspector on 9th April 2013. At this stage it was agreed that the first elements of the Green Belt review would be completed before the end of April. Whilst there was some debate as to the merits of a two stage process, with some members of the audience endorsing the approach and others having some concerns, the Inspector herself did not at that point indicate at that stage that the Council's planned approach was unacceptable.</p> <p>It is considered that proposed major modifications to policy 3 will clearly identify a strategy for reviewing Green Belt boundaries as part of the Local Plan part 2.</p>	
Barratt Homes	Endorse the approach and findings of the broad assessment, as contained in Assessment Results and Overall Conclusions for 'broad sectors /areas A, B and C and as depicted on Figure 6 – in relation to the remainder of the Green Belt within	Noted	No change required

Consultee	Comment	RBC Response	Amend GBR
	<p>Rushcliffe.</p> <p>Endorse the approach and findings of the broad assessment, as contained in Overall Conclusions (para 4.12 – 4.18) and as depicted on Figure 4 in relation to preferred ‘broad locations’ 2, 4 and 5.</p> <p>Endorse the approach, findings and conclusions of the detailed review undertaken, as contained in pages 68 – 105 and associated Figures and Tables.</p>		
Persimmon Homes	<p>Para 4.40 – Agree that Radcliffe on Trent can accommodate further housing and support the findings that a full Green Belt review is required. Specifically in respect of land to the north east off Shelford road at Grooms Cottage.</p> <p>Page 4.18 – East Gamston. Considered a strong strategic site that must be considered as part of all future Green Belt reviews. Specifically with regard to land running east off Little Lane up to the A52, and derelict airfield.</p> <p>Zone 5.2 - we agree that Little Lane leading up to Jubilee wood represents a natural defensible boundary to avoid coalescence between the</p>	<p>Site specific issues and detailed changes around Key Settlements in or adjacent to the Green Belt such as Radcliffe on Trent will be dealt with through the Land and Planning Policies DPD. It is considered that proposed major modifications to policy 3 will clearly identify a strategy for reviewing Green Belt boundaries as part of the Local Plan Part 2</p> <p>5.2. Noted</p> <p>5.1 – This Zone lies to the south of the ridge line. When assessed , it was</p>	No change required

Consultee	Comment	RBC Response	Amend GBR
	<p>proposed East Gamston and Tollerton.</p> <p>Zone 5.1 – we disagree that this whole area should not be considered as part of the Green Belt review. The arbitrary boundary lines does not make full use of the available land within the northern area of zone 5.1 specifically land extending beyond Jubilee wood south west via Glebe Farm. A strong defensible boundary can still be achieved to protect against coalescence and provide a visual barrier between East Gamston and Tollerton while providing possible access onto the A52. To ignore this northern extent of zone 5.1 could severely curtail options at East Gamston, adversely restrict access to future facilities for residents at Tollerton and render farm land unserviceable.</p>	<p>considered that it relates more to the wider rural area and to the main part of Tollerton village, and release of this area would lead to coalescence between West Bridgford and the main part of Tollerton, hence the conclusion that the area performs a medium-high Green Belt function.</p>	
Mosaic Estates	<p>Radcliffe on Trent: 'Broad Area C' table highlights that the Tribal study referred to floodplain constraint to the west. Greater Nottingham SFRA has now identified that land to the north of Nottingham Road adjacent to settlement and within the bounds of the former mineral railway embankment, are not at risk from flooding from the Trent - vitally important that the potential for this site to form part of the Green Belt review, is not</p>	<p>It is recognised that the SFRA is the most up to date information in terms of flood risk and post-dates the Tribal study, and consideration will be given to the latest information available when looking at identifying potential sites for development as part of the Local Plan Part 2 (Land and Planning Policies</p>	<p>Include text to make clear what are considered to be potential show-stoppers to development that would rule out a broad area or zone for</p>

Consultee	Comment	RBC Response	Amend GBR
	<p>excluded on the basis of non-existent, non-Green Belt constraints.</p> <p>In respect of the assessment of areas 5.2 5.3 and 5.4 it is unfathomable that this open countryside beyond the A52 could be considered as having only medium importance. The given score is not credible and its importance on individual criteria is underweighted overall because of having a 0 score for historic impact. While sites within broad location 4 are discounted because they breach the A52, areas in broad location 5 are not considered in the same consistent way</p> <p>Area 3 - appears to be a significant difference in view on coalescence between the 2006 Green Belt Review and the RBC 2013.</p> <p>2006 review was an officer report, compiled within a different growth and economic context and was not subject to public consultation or examination. The Tribal studies were not in themselves a Green Belt review - took into account other potential constraints to identify potential directions for growth - not related to the Green Belt, and may be overcome. Should be used carefully to avoid excluding potential boundary reviews based on non-Green Belt issues. According to Table 2,</p>	<p>DPD).. .</p> <p>In respect to zones 5.2, 5.3 and 5.4, the NPPF does not attach any increased or lesser importance to the purposes of including land within the Green Belt, therefore the assessment and its scoring has been carried out on this basis. The NPPF Green Belt purpose refers to preserving the setting of historic towns; under this purpose, the Council has considered whether development would impact on setting and character of highly valued historic assets, as shown in the assessment tables. Zone 5.3 which contains a number of Grade II Listed structures has a score of 1 to reflect the impact on the setting of these pill boxes development would have.</p> <p>Area 3 is a more focussed area than the area F contained within the Tribal Study, and assessment has been undertaken on that basis.</p> <p>The 2006 Green Belt review formed part of the evidence base for the former East</p>	<p>development.</p>

Consultee	Comment	RBC Response	Amend GBR
	<p>'significant barriers to development' will be considered as part of the review – this is wrong – only Green Belt factors should be taken into account, with other constraints being a further filter at allocation stage.</p> <p>The RBC score, which gives the Green Belt criteria a score out of 5 and then an overall total out of 25 does not give due weighting to individual criteria - suggests that the 5 Green Belt criteria cannot be mutually exclusive and are not individually important.</p> <p>Radcliffe on Trent - existing railway embankment to the west is a very clear, contained and permanent feature. The embankment will clearly limit development to the west; prevent sprawl, coalescence or impact on Holme Pierrepont Hall.</p>	<p>Midlands Regional Plan and was open to scrutiny through the EIP process. The Panel concluded in their report that the Green Belt review was an appropriate assessment when assessing the purposes of including land within it.</p> <p>The 2006 Review assessed the importance of the Green Belt looking at very broad areas, this review focuses in on specific sections; hence scores are likely to differ between the two studies.</p> <p>Whilst it is acknowledged that the review should not consider factors other than the 5 Green Belt criteria when assessing the importance of areas in Green Belt terms, it seems expedient to discount areas where an absolute barrier to development in planning terms is evident.</p>	
Rushcliffe Ramblers	Fig 6 - The easing of the Green Belt to the East of Nicker Hill would be a grave error and create a town out of a village ruining good enjoyable	Site specific issues and detailed changes around Key Settlements will be dealt with through the Land and	No changes required.

Consultee	Comment	RBC Response	Amend GBR
	<p>countryside. Cropwell Butler should remain washed over. Plumtree should remain washed over. Shelford constraints should include flooding.</p> <p>AREA 5 Sec.5.1 Should be Green Belt. 5.2 Disagree this section should remain in Green Belt as the A 52 Lings Bar Road creates a very defensible boundary to urban sprawl across the countryside. 5.3 Again feel that A52 provides a defensible barrier however as the airport is mostly a brownfield site this could be developed and have an inset boundary around the perimeter. This should stretch no further as protection for the countryside especially the Grantham Canal which is an extremely well-used recreational facility. This would also prevent any coalescence between Tollerton and Bassingfield. 5.4 Again beyond the A52 and already has buildings on it and would be close to Bassingfield. 5.5 Agree.</p>	<p>Planning Policies DPD.</p> <p>The Council considers that insetting Cropwell Butler and Plumtree is in line with NPPF Para 86</p> <p>Constraints set out are taken from the Tribal study.</p> <p>Zone 5.2 – The study suggests that this zone it could be removed subject to a stronger defensible boundary being created to avoid coalescence between old Tollerton and any future development within these zones.</p>	
Cropwell Butler Parish Council	<p>Page 53 - Disagree with the findings/ constraints/ recommendations for Cropwell Butler. Considerable open character within the village boundary making an important contribution to Green Belt. The village should remain washed over. Need for a thorough assessment of the</p>	<p>Council considers that insetting Cropwell Butler is in line with guidance within NPPF at Para 86.</p> <p>Section 2 of the GBR sets out background information relating to</p>	No changes required.

Consultee	Comment	RBC Response	Amend GBR
	<p>character of Cropwell Butler, particular its openness.</p> <p>Green Belt status outside of PUA should not be subject to review except to accommodate development at Cotgrave Colliery and RAF Newton.</p>	<p>housing need and land availability within Rushcliffe and provides that sites within the Green Belt are required in order to meet this need due to limited non-Green Belt opportunities for further development adjacent to the main built up area of Nottingham and around some of Rushcliffe's more sustainable settlements.</p> <p>Site specific issues will be dealt with through the Local Plan Part 2: Land and Planning Policies DPD. Formal consultation will be carried out in relation to this document so the opportunity to contribute will be available at this stage.</p>	
Radcliffe on Trent Parish Council	<p>Need for a definitive timescale for GB review.</p> <p>Page 61 Radcliffe wrongly referred to as Keyworth (Radcliffe on Trent PC).</p> <p>Agree that there is a need to define new inset boundaries to the village, and that the direction for growth should be to the northeast. And southeast to tidy the village boundary and avoid flood risk. Do not believe there are high levels of infrastructure</p>	<p>Site specific issues and detailed changes around Key Settlements will be dealt with through the Land and Planning Policies DPD. It is not possible to provide a definitive timescale for the production of this document as it is dependent on the progress of the examination of Part 1 of the Local Plan: Core Strategy. Those registered on the Borough Council's consultee database</p>	<p>No changes required to the review. A timetable will be provided in due course.</p> <p>Amend – replace 'Keyworth' with</p>

Consultee	Comment	RBC Response	Amend GBR
	capacity.	<p>will be kept informed of developments.</p> <p>This is a typing error and will be amended.</p> <p>Information regarding levels of infrastructure capacity is taken from the Tribal Study 2010 – if the consultee considers these conclusions are out of date/incorrect we would welcome further details.</p>	'Radcliffe'
Browne Jacobson	<p>Agree with the general approach to the Green Belt review; however, disagree with ruling out area 6 altogether from the review as areas not at risk of flooding as now protected, and the scores attributed to individual zones. More detailed comments are summarised as follows:</p> <p>No need to keep zone 5.5 permanently open, parts of zone 5.5 can be safeguarded. Polser Brook at eastern end forms permanent feature. No policy grounds for Bassingfield protection, precedent of Gamston Village</p> <p>Bassingfield is a good core on which to base development, potential access from both west and</p>	<p>The strategic Flood Risk Assessment identified that significant proportions of the area were still at risk of flooding in a 1 in 20 event (Black and Veach, flood dynamics plan). The plan that has been supplied as part of the submission by Browne Jacobson is an extract from the flood hazard plan, contained within the SFRA. The plan identifies that the degree of hazard ranges from low to significant, more than anywhere else within and adjacent to the main built up area within Rushcliffe that is behind main flood defences. It is therefore considered that the broad area should not be carried forward into the more</p>	No changes required

Consultee	Comment	RBC Response	Amend GBR
	<p>east (Cotgrave Lane) without major infrastructure costs. Existing sewerage infrastructure and only flood risk is in far north eastern corner adjoining Polser Brook</p> <p>Further details can be found in the Browne Jacobson submission on behalf of Bassingfield Landowners</p>	<p>detailed assessment.</p> <p>Zone 5.5 scores highly in terms of importance in relation to Green Belt purposes – in particular it would effectively subsume Bassingfield, both visually and physically.</p> <p>It is not considered that the example of Gamston Village sets a precedent, specifically because the land around Gamston village was never located, proposed to be located within the Green Belt. Zone 5.5 ranks medium-high in terms of importance in relation to the Green Belt purposes. The methodology explains clearly what is meant when providing an assessment of Green Belt at local level. It the Borough Council's opinion is that the local interpretation of 'merging' should include villages as well as towns.</p>	
Ben Bailey Homes	Ben Bailey Homes has an interest in land within Zone 4.2. We agree with the approach and findings of the assessment in relation to this zone. Our own evidence submitted previously in response to consultation on the Core Strategy identified that	Noted	No change required

Consultee	Comment	RBC Response	Amend GBR
	land in this zone is of low importance to the Green Belt.		
Nottingham-shire County Council Property	<p>Throughout the Stage 1(a) Assessment, reference is made to Broad Area 6 – River Trent Corridor as ‘functional floodplain’. This over-simplification is not true of all the land. Much of the area is now ‘defended land’ following the upgrading of the River Trent flood defences in 2009. Land at Regatta Way should not therefore be rejected as part of Broad Location 6, particularly as it performs well against most Green Belt criteria (para. 4.15).</p> <p>In view of its ‘sustainability’ and ‘Green Belt criteria’ status, the identified land (presume at Adbolton as this is referred to earlier in the response) should be excluded from the Green Belt and re-designated as ‘safeguarded land’. It is capable of development for education (e.g. Nottingham Emmanuel and Becket Schools off Wilford Lane) and other uses which may serve the Lady Bay community enhancing sustainability.</p>	<p>The last update to the Strategic flood risk Assessment (dated March 2010) identifies that a significant proportion of the area 6 is still at risk of flooding from, not only from the Trent itself, but also from the tributaries that run through it, despite the upgrading of the River Trent flood defences.</p> <p>The last update to the SFRA (dated provided that a significant part of Area 6 is at risk of flooding in a 1 in 20 year event which is the equivalent of a 1 in 20 flood event, therefore this is effectively functional floodplain.. It is not considered that this area should be advanced for detailed review.</p> <p>Emmanuel School and Beckett School were assessed in line with the flood risk policy at the time on their own merits. They were also within the existing built-up area. Flood risk policy at national level has been considerably strengthened since the introduction of</p>	No changes required.

Consultee	Comment	RBC Response	Amend GBR
		clearer guidance in relation to sequential and exception tests as part of the previous PPS 25 and the NPPF.	
Plumtree Parish Council	<p>An impartial review would not conclude East of Gamston is more appropriate for release than the additional expansion west of Clifton where there are clear boundaries and infrastructure provision. Assessment of sites 2.2 and 2.4 to the west of Clifton compared with the assessment of sites 5.2, 5.3 and 5.4 follows no logical or reasonable conclusion.</p> <p>The scores relating to Green Belt importance seem to have changed in some categories from 1/5 to 5/5 between the Green Belt review in 2006 and the internal Rushcliffe Review in 2013 despite no material change. The land to the East of Clifton/ Northwest of Ruddington scored 1/5 in 2006 as 'no real threat' but now this score has be revised to 5/5</p> <p>Independent assessment should be undertaken by consultants not directly employed by Rushcliffe to obtain a proper impartial assessment.</p> <p>Object to proposal to remove Plumtree from the Green Belt and create an inset village.</p>	<p>It is considered that the assessment has been carried out on a consistent basis using the detailed criteria that is listed in the assessment tables. Areas 2.4 and 2.2 therefore score more poorly than 5.2, 5.3 and 5.4 in relation to several of the purposes of Green Belt, regardless of whether there are clear boundaries and infrastructure provision.</p> <p>The 2006 Review assessed the importance of the Green Belt looking at very broad areas, this review focuses in on specific sections; hence scores are likely to differ between the two studies.</p> <p>The council considers that the recommendation that Plumtree is inset from the Green Belt accords with national guidance contained within NPPF at Para 86.</p>	No changes required.
Barton in Fabis	Do not want to see any land from area 2 deleted	The need for a Green Belt Review has	No change

Consultee	Comment	RBC Response	Amend GBR
Parish Council, CPRE	from the GB , but can follow the argument that zones 2.1 and 2.3 are least damaging options. Consider safeguarding this land rather than redrawing the GB boundary. Could be drawn upon for development if after monitoring of actual build rates and housing need the conclusion is reached that the land is needed.	arisen at this time due to housing need; unfortunately given the level of housing need it is not possible to safeguard this land as it is considered that it is required within this plan period.	required.
Antony Aspbury Associates	Entire 'Melton Triangle' physically defined and should be removed from Green Belt along with the whole of 4.2. Opportunity at the northern 'tip' of the Zone for additional small scale development between Hill Farm Court and 229 Melton Road within the undeveloped curtilage /paddock area.	Noted	No changes required.
BiF PC/Freeth Cartwright for BPB UK	Agree that Gotham should be/remain inset from the GB subject to a clear defensible boundary being identified to avoid coalescence. Freeth Cartwright set out specific boundary proposals in their response. Do not agree that growth in Gotham should be restricted to local needs.	Noted. Site specific issues and detailed changes around Key Settlements will be dealt with through the Local Plan Part 2: Land and Planning Policies DPD. Comments will be welcomed at this stage in relation to amended boundaries. Gotham is not designated as a Key Settlement within Core Strategy therefore growth is restricted to that needed to meet local needs. Representations should have been	No changes required.

Consultee	Comment	RBC Response	Amend GBR
		made to the Core Strategy consultation on this point rather than the Green Belt Review. Gotham is not currently inset from the Green Belt; the review recommends that it should be inset.	
Barton in Fabis Parish Council	<p>Agree that Barton in Fabis should be remained washed over by the Green Belt</p> <p>Landscape value of area South of Clifton has been under estimated, the report has therefore failed to take account of key elements of the NPPF (para 79, 109, 17).</p> <p>The GBR is a hurried exercise – the need for a systematic review of the Greater Nottingham GB as a whole is set out in the Regional Plan and recognised in the RBC review. It follows that distribution of housing should be reconsidered in light of this review. Rushcliffe’s acceptance of the need for an additional 3,550 houses to be accommodated within the Borough needs to be conditional upon the Green Belt Review of Rushcliffe and of the Green Belt in the other Districts.</p> <p>We are not aware that RBC has made any attempt to request other Districts carry out a GBR in their</p>	<p>Acknowledged</p> <p>Landscape quality is not in itself a Green Belt issue, however the impact development would have on the role of smaller scale ridges and key landscape features in providing a backcloth to urban areas could be considered as these features are fundamental to appreciation of the open countryside.</p> <p>The role of the Green Belt review is to consider importance of zones in Green Belt terms to inform decisions made by the Local Plan regarding locations for development. Consideration has, and will also be given to other factors such as Landscape and agricultural land quality as part of this decision making process. Such information is contained within the Landscape Character Assessment, the Tribal Studies and the</p>	<p>No changes required</p> <p>Clarification of what are considered to be show stoppers to be added to the review.</p>

Consultee	Comment	RBC Response	Amend GBR
	<p>areas at this time.</p> <p>Sceptical of results of Tribal Studies which were not subject to public consultation and therefore flawed</p> <p>We are asked to accept that there are no alternative sites in the SHLAA, we need to be provided with evidence for that – the SHLAA should be published and consulted upon. Other Districts should also review their SHLAA and assumptions made on windfall sites, citing the Duty to Cooperate as reason to do this</p> <p>BiF PC provide suggestions as to how GBR should be carried out from para 2.1 onwards (see response for specific detail). Appraisal system should be revised – para 3.1 of response onwards (BiF PC) provides BiF PC assessment and subsequent results. Supporting evidence has subsequently been provided by Ken Mafham obo BiF Parish Council and Gotham Parish Council.</p> <p>Conflict between statements within the GBR regarding remit of the GBR and review of Local Plan. Para 1.3 provides that the plan making process and potential review of the GB are distinct, but section 2.6 seems to take as established that</p>	<p>Sustainability Appraisal.</p> <p>Distribution of housing is not a matter for the Green Belt Review; representations on this matter should be made against the Core Strategy.</p> <p>The Inspector charged with examining Rushcliffe's Local Plan considers that it is necessary to demonstrate that the Green Belt impacts of the plan proposals have been fully considered through a Green Belt Review. It is for the Inspector to decide whether the same issue applies to those other authorities within the HMA, and to consider whether their assessment of the Green Belt is sound based upon the Councils' case, and other representations made, the Inspector will form a judgement on the adequacies of the evidence base to the plan.</p> <p>The Tribal studies form only one element of the evidence which supports the Green Belt Review; the Council has also relied on the 2006 Review, the guidance contained within the NPPF</p>	

Consultee	Comment	RBC Response	Amend GBR
	<p>exceptional circumstances apply, which is the remit of the Local Plan, not the GBR.</p> <p>The assessment on pg 22 contains a factual error – it is claimed that Gotham Hills would provide ‘an element of screening when approached from the A453’ – they would not, as any housing development proposed for area 2 would be further along the a453 towards Nottingham</p> <p>In reviewing GB boundaries it is important that new boundaries are likely to be permanent (NPPF para 85) this is not the case with most of the candidates for boundaries in zone 2. Only the roads are likely to be permanent.</p> <p>The report correctly says that the Green Belt boundaries should only be amended in exceptional circumstances. We submit that these should be established beyond reasonable doubt.</p> <p>The NPPF refers to ‘identified requirements’ – at this stage of RBC’s plan preparation the requirements are disputed – it does not seem right to treat disputed requirements as identified.</p>	<p>and also reached conclusions based on desk based assessment and visits to relevant areas. The Tribal studies form part of the evidence base in support of the Core Strategy, therefore comments about the adequacy of the studies have and should be considered as part of the Core Strategy Consultation process</p> <p>The SHLAA is a technical document that is re-published each time it is updated. As with the Tribal studies, the SHLAA forms part of the evidence base therefore comments about its adequacy have and should be received and considered as part of the Core Strategy consultation process. The Inspector will form a judgement on the adequacies of the evidence base to the plan.</p> <p>It is considered that each broad location/zone was assessed in a consistent manner against the criteria contained within the assessment tables. No change to the scoring is required</p> <p>The NPPF does not attach weighting to any of the five purposes; therefore the</p>	

Consultee	Comment	RBC Response	Amend GBR
		<p>review also attaches equal weight to the purposes. The Green Belt Review considers only these five purposes (albeit where areas have ‘show stoppers’ they have not been carried forward from stage 1(a).)</p> <p>Section 2 of the GBR sets out background information relating to housing need and land availability within Rushcliffe and provides that sites within the Green Belt are required in order to meet this need due to limited non-Green Belt opportunities for further development adjacent to the main built up area of Nottingham and around some of Rushcliffe’s more sustainable settlements. The Borough Council considers this to constitute ‘exceptional circumstances’ necessitating a change to Green Belt boundaries hence the need for a Review. It is for the Inspector examining the Local Plan to ultimately decide whether these circumstances do in fact constitute exceptional circumstances.</p> <p>Section 2 therefore provides the context</p>	

Consultee	Comment	RBC Response	Amend GBR
		<p>for the Green Belt Review. It is a technical document which will aid decisions on where the Green Belt may be amended to accommodate these future development requirements.</p> <p>It is acknowledged that the Gotham Hills may not provide screening of close range views over Zone 2 i.e. from that section of the A453 close to the City, however it is considered that the hills would provide an element of more long range screening of this Zone from further down the A453 away from the City.</p> <p>It is acknowledged that Green Belt boundaries should only be amended in exceptional circumstances, the decision as to whether these exceptional circumstances exist is ultimately for the Inspector in her examination of the soundness of the Council's Core Strategy.</p> <p>The NPPF Para 85 provides that local planning authorities should: define boundaries clearly, using physical</p>	

Consultee	Comment	RBC Response	Amend GBR
		<p>features that are readily recognisable and likely to be permanent. Zones have been defined using the strongest features on the ground to divide the broad locations around the built up area of Nottingham. These include trunk roads; main roads and substantial watercourses.</p> <p>Disputes over housing numbers and distribution are not matters for the Green Belt Review; representations on this matter should be made against the Core Strategy. The Inspector charged with examining Rushcliffe's Local Plan considers that it is necessary to demonstrate that the Green Belt impacts of the plan proposals have been fully considered through a Green Belt Review hence the need for this work.</p>	
Barton in Fabis Parish Council	Approach to assessment of outer edge of Green Belt is in stark contrast extremely limited and wholly inadequate. 2006 review was strategic and does not provide sufficiently detailed assessment to inform GB policies of the Core Strategy.	The 2006 review was undertaken to support the spatial strategy of the East Midlands Regional Plan and its conclusions were considered robust. Little, if anything has change in terms of Green Belt within Rushcliffe since the review was undertaken. It is therefore	No changes required.

Consultee	Comment	RBC Response	Amend GBR
		<p>still considered to be a sound starting point when undertaking the more Rushcliffe specific review.</p> <p>It forms only one element of the evidence which supports this Green Belt Review; the Council has also used information, as relevant, from the Tribal Studies and the guidance contained within the NPPF and used this evidence base to draw its own conclusions based on desk based assessment and visits to relevant areas</p>	
<p>Ken Mafham obo BiF Parish Council and Gotham Parish Council.</p>	<p>In the reps made by BiF PC and Gotham PC there is reference made to technical evidence using digital contours to demonstrate the visual impact of the proposals for land south of Clifton.</p> <p>2 exercises:</p> <ul style="list-style-type: none"> - One uses the relative height of thousands of points to calculate the areas from which development will be seen - Looks at lines of sight from point to point 	<p>This comment is of more relevance to the consultation on the Local Plan Part 1: Core Strategy as it relates specifically to Policy 23 Land South of Clifton. Visual and desktop assessments were carried out as part of the Green Belt review when assessing against the five purposes of the Green Belt</p> <p>The Green Belt Review is a technical document which will aid decisions on where the Green Belt may be amended</p>	<p>No changes required.</p>

Consultee	Comment	RBC Response	Amend GBR
	<p>Conclusions:</p> <p>The area from which the development will be visible is comparatively large, due to the high ground and very open nature of the landscape. The visual impact of housing would be much easier to mitigate than large warehouse builds, although if housing has to be built at all, this should be on the lower part of the site. The area between such housing and the existing edge of Clifton should be developed as a recreational area.</p> <p>Happy to make the work available to the Council to enable use of the technique to determine a least harm solution which would form the evidence for a development brief that would include mitigation by means of strategic landscaping both on and off the site.</p>	<p>to accommodate this future development but does not in itself make decisions in relation to the site layout.</p> <p>Additional work has now been made available to the Borough Council for its consideration.</p>	
Clifton Landowners	<p>North of new A453 Alignment and River Trent corridor- the definition of this area is too broad. Fails to distinguish between land south and east of the existing A453 and the land north and west of it. Land to the south and east, between the new and old A453 clearly relates more closely to the built up area, is not at risk of flooding and does not have</p>	<p>It is considered that each broad location/zone was assessed in a consistent manner against the criteria contained within the assessment table. No change to the scoring is required</p> <p>The Nottinghamshire and Derbyshire County Council's strategic review of the</p>	No change required

Consultee	Comment	RBC Response	Amend GBR
	<p>steep topographical features. Area between new and old A453 should be removed from Green Belt</p> <ul style="list-style-type: none"> - Zone 2.1: This is obscured on Fig 7. It is assumed it is the zone immediately east of zone 2.3. Given the conclusions in relation to other zones, it is considered that the conclusions in relation to ‘the prevention of neighbouring towns from emerging’ and ‘to assist in safeguarding the countryside from encroachment’ are too high. Amendments should be made accordingly - Zone 2.3 The conclusion in relation to ‘assist In safeguarding the countryside from encroachment’ is a product of the Council’s decision on area zoning. In reality this zone relates directly to zone 2.1 and encroachment would not result in a linear expansion. Indeed this is in part recognised by the council, the assessment states that some encroachment would occur ‘in a linear fashion if considered in isolation’ Because of the interrelationship between zones 2.1 and 2.3, their respective scores should be 3/5. 	<p>Green Belt in 2006 provides strategic guidance as to the relative importance of different areas of Green Belt. This review has developed further the outcomes of the 2006 review. In addition, the 2 Tribal studies have informed the process.</p> <p>Zone 2.1 – number is obscured by ‘draft’ across the page, this will be removed for final document. Scores lower than 2.2 and 2.4 in terms of potential to merge with neighbouring towns and higher than 2.3 due to it having a visual relationship with Gotham – this assessment is considered to be correct.</p> <p>In terms of encroachment into the countryside it scores lower than Zones 2.4 and 2.2 as it relates more to the existing urban edge than these two zones.</p> <p>It was considered that Zone 2.3 was more contained by features on the ground and visually would not provide an element of merging, therefore the</p>	

Consultee	Comment	RBC Response	Amend GBR
		scoring is appropriate.	
Taylor Wimpey	<p>Zone 5.2: Area outlined in Appendix 1 of TW response the minimum required to achieve the objective of meeting Rushcliffe’s housing requirement to 2028. Proposed separation from Tollerton of 800m, which could be extended to 1km. Remove zone from Green Belt.</p> <p>Zone 5.3 follows on naturally from 5.2 and so should also be released from Green Belt. Recognisable boundaries to the north and east of the zone, particularly Polser Brook.</p> <p>Zone 5.4: recognised flood risks to the north of this area but if zones 5.2 and 5.3 are released, this should be as well</p> <p>Zone 5.5: Good boundary to the north and Polser Brook to the west. Its removal from the Green Belt, along with zones 5.2, 5.3 and 5.4 would ensure that the Green Belt boundary would not need further review at the end of the plan period. Dwellings at Bassingfield could be incorporated into new development, having regard to their amenities</p>	<p>Zone 5.2 – comments noted.</p> <p>Zone 5.3 – comments noted.</p> <p>Zone 5.4 – comments noted.</p> <p>Zone 5.5 – disagree – this zone scores highly in terms of importance to Green Belt purposes, particularly in terms of prevention of merging of neighbouring towns.</p> <p>Zone 6 - The last update to the SFRA provided that a significant part of Area 6 is functional flood plain. Therefore, it is not considered that this area should be advanced for detailed review as exceptional circumstances could not be demonstrated to remove the land from the Green Belt.</p>	No change required to Review itself.

Consultee	Comment	RBC Response	Amend GBR
	<p>Zone 6: Whilst subject to flood risk, any expansion of this area for leisure would be severely constrained by Green Belt. Consideration should be given to removing the Green Belt here, encouraging the consolidation of leisure development to integrate with a new community at Gamston</p> <p>In order to ensure that any new development maintains a degree of permanence, the new boundary at Gamston should not be drawn excessively tight to simply accommodate development to 2028 (Taylor Wimpey) The Taylor Wimpey response to the GBR goes on to outline reasoning why release of the site from the Green Belt is justified. A plan is attached to the response.</p>		
Edwalton Consortium, Bloor Homes, Clifton Landowners	Consider that the conclusions of the Green belt review are broadly acceptable and support the increase in housing on land at Edwalton.	Noted	No changes required.
Havenwood	No objection to general approach but no explanation given as to how the 6 areas came to be selected. Also no explanation as to how the outer boundaries of the areas were fixed, it is not accepted that the Assessments of Areas 3, 4 and 5	The Nottinghamshire and Derbyshire County Council's strategic review of the Green Belt in 2006 provides strategic guidance as to the relative importance of different areas of Green Belt. This	No changes required – it is considered that sufficient clarity is provided in

Consultee	Comment	RBC Response	Amend GBR
	<p>can be considered sound. Amended scores are suggested in the Havenwood response.</p> <p>Area 6 has the lowest scoring area and yet has not gone on to follow this with further assessment. Black and Veatch for the Greater Nottingham Strategic Flood Risk Assessment. Area adjacent to Lady Bay has significant potential</p> <p>Area 5 should be scored lower than Clifton due to the airfield. In Area 5 there are no historic towns affected yet the area attracts a score of 1, should be 0. Scoring in Area 5 too high because the Council has selected the wrong boundaries and mislead itself with relation to NPPF criteria.</p>	<p>review has developed further the outcomes of the 2006 review. In addition, the 2 Tribal studies have informed the process.</p> <p>The 6 sectors have been defined using the strongest features on the ground to divide the broad locations around the built up area of Nottingham. These include trunk roads; main roads and substantial watercourses.</p> <p>The strategic Flood Risk Assessment identified that significant proportions of the area was still at risk of flooding in a 1 in 20 event (Black and Veatch, flood dynamics plan). The plan that has been supplied as part of the submission by Browne Jacobson is an extract from the flood hazard plan, contained within the SFRA. The plan identifies that the degree of hazard ranges from low to significant, more than anywhere else within and adjacent to the main built up area within Rushcliffe that is behind main flood defences. It is therefore</p>	<p>relation to the identification of the six zones.</p>

Consultee	Comment	RBC Response	Amend GBR
		<p>considered that the broad area should not be carried forward into the more detailed assessment.</p> <p>At stage 1(b) the Zone containing Nottingham Airport is scored 2/5 in relation to recycling of derelict and other urban land. At Stage 1(a) this score is 3/5 because the area assessed as this stage is wider and encompasses several Zones which do not contain brownfield sites.</p> <p>Area 5 attracts a score of 1 in relation to preserving the setting of historic towns because consideration has been given to the setting of the Grade II Listed pill boxes located within this area.</p>	
Samworth Farms via Fisher German	Review is supported but serious concerns re phased approach and limited areas to which the review is focussed. Large sites will not deliver the numbers per annum to meet housing requirement, additional smaller sites are needed therefore review around key settlements needs to be undertaken in parallel with review of PUA. It is suggested that the Green Belt around Cropwell Bishop and East of Radcliffe on Trent are reviewed	The Green Belt review is phased to reflect the phased approach to the Local Plan process. This approach was adopted given the advanced stage of the Core Strategy; to ensure that the Core Strategy and therefore strategic site allocations can be adopted in as short a period time as possible, rather than beginning afresh on a Local Plan	No changes required.

Consultee	Comment	RBC Response	Amend GBR
	and justification for this set out in the response.	<p>which whilst this would incorporate non-strategic site allocations would take a much longer period of time to produce and therefore delay the adoption of a plan further.</p> <p>The concept of a 2 stage review process was debated at the Technical Meeting held with the Inspector on 9th April 2013. At this stage it was agreed that the first elements of the Green Belt review would be completed before the end of April. Whilst there was some debate as to the merits of a two stage process, with some members of the audience endorsing the approach and others having some concerns, the Inspector herself did not at that point indicate that the Council's planned approach was unacceptable.</p> <p>Cropwell Bishop is not designated as a Key Settlement within the Core Strategy therefore growth is restricted to that needed to meet local needs.</p> <p>Representations should be made to the Core Strategy consultation on this point</p>	

Consultee	Comment	RBC Response	Amend GBR
		<p>rather than the Green Belt Review.</p> <p>Site specific issues and detailed changes around Key Settlements such as Radcliffe on Trent will be dealt with through the Local Plan Part 2: Land and Planning Policies DPD.</p>	
Tollerton Parish Council, CPRE	<p>A52 is a strong GB boundary and none of the alternatives mentioned in sct Part 1(a) are as defensible. Of those mentioned the canal would be most defensible. Polser Brook is too insignificant, Little Lane does not extend far enough beyond Tollerton to secure openness of the GB, field boundaries can be redrawn too easily and farm tracks moved.</p> <p>Conflict between statements within the GBR regarding remit of the GBR and review of Local Plan. Para 1.3 provides that the plan making process and potential review of the GB are distinct, but section 2.6 seems to take as established that exceptional circumstances apply, which is the remit of the Local Plan, not the GBR.</p> <p>NPPF requires LPAs to ensure consistency with sustainable development. This is not best met by making development needs part of the assessment</p>	<p>NPPF Para 85 provides that local planning authorities should: define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.</p> <p>Section 2 of the GBR sets out background information relating to housing need and land availability within Rushcliffe and provides that sites within the Green Belt are required in order to meet this need due to limited non-Green Belt opportunities for further development adjacent to the main built up area of Nottingham and around some of Rushcliffe's more sustainable settlements. The Borough Council considers this to constitute 'exceptional circumstances' necessitating a change to Green Belt boundaries hence the</p>	No changes required.

Consultee	Comment	RBC Response	Amend GBR
	<p>criteria for the GBR – it is felt this is the case give that the NPPF refers to ‘identified’ requirements (para 85) – the requirements are still disputed so are not ‘identified’ currently. Also the NPPF definition of sustainable development includes the environmental side of sustainable development.</p> <p>The evidence from the 2007 East Midlands Regional Plan Panel Report is not relevant to this review – it was an integral part of the preparation of the RSS rather than evidence used in its preparation, also the judgement regarding the Green Belt was not even taken forward to later stages of the Regional Plan because LPAs in Greater Nottingham raised objections.</p> <p>Tollerton: The scores for checking the urban sprawl within Zones 5.1 to 5.5 are disproportionately low and should be increased to 5/5. The scores for coalescence in Zones 5.2 and 5.3 should be increased to 3/5. Score for safeguarding from encroachment should be increased to 5/5 in zones 5.1 to 5.5. More consideration of preserving historic setting. Don’t want any land to be removed but if it has to be done then leave zones 5.1 and 5.5 in the Green Belt, remove 5.2, not remove 5.3 – instead safeguard it and only consider it for development</p>	<p>need for a Review. It is for the Inspector examining the Local Plan to ultimately decide whether these circumstances do in fact constitute exceptional circumstances.</p> <p>Section 2 therefore provides the context for the Green Belt Review. It is a technical document which will aid decisions on where the Green Belt may be amended to accommodate these future development requirements.</p> <p>The 2006 review was undertaken to support the spatial strategy of the East Midlands Regional Plan and its conclusions were considered robust by the EIP Panel. Little, if anything has change in terms of Green Belt within Rushcliffe since the review was undertaken. It is therefore still considered to be a sound starting point when undertaking the more Rushcliffe</p> <p>It forms only one element of the evidence which supports this Green Belt Review; the Council has also relied on the Tribal Studies, the guidance</p>	

Consultee	Comment	RBC Response	Amend GBR
	<p>after further careful assessment in future as to whether it is needed.</p>	<p>contained within the NPPF and used this evidence base to draw its own conclusions based on desk based assessment and visits to relevant areas</p> <p>The NPPF Green Belt purpose refers to preserving the setting of historic towns; under this purpose, the Council has considered whether development would impact on setting and character of highly valued historic assets. Zone 5.3 which contains a number of Grade II Listed structures has a score of 1 to reflect the impact on the setting of these pill boxes development would have.</p> <p>The need for a Green Belt Review has arisen at this time due to housing need; unfortunately given the level of housing need it is not possible to safeguard land as suggested as it is required within this plan period.</p>	
FFR	<p>Outer edge was defined in 1989, significant changes have occurred since – a revised Green Belt boundary is justified on land at/around the former Station Hotel in Sutton Bonington. At this location, whilst land to the south of the road is</p>	<p>Sutton Bonington village does not lie within the Green Belt, although the site referred to which is outside of the village does.</p>	<p>No changes required</p>

Consultee	Comment	RBC Response	Amend GBR
	<p>covered by countryside policies, land to the north (which contains more built development) lies in Green Belt. The area contributes little to the 5 main purposes of the Green Belt and it is considered that the built up area, north of Station Road, should be removed from the Green Belt. The area North of Station Road is not open. This new Green Belt boundary would better reflect the 5 main purposes of Green Belt.</p>	<p>Sutton Bonington is not designated as a Key Settlement within the Core Strategy and therefore only development to meet local needs would be considered appropriate. Representations should be made to the Core Strategy consultation on this point rather than the Green Belt Review. It is not considered necessary therefore to give consideration to a small scale review Green Belt boundary at this location at this stage. This would be more appropriately dealt with at the second stage of the Green Belt Review.</p>	
<p>Capita Symonds</p>	<p>Submission received from Capita Symonds assessing a site on Nottingham Road, Radcliffe on Trent against the NPPF Green Belt criteria. See rep for further details</p>	<p>Radcliffe on Trent has been recommended as a settlement that should undertake a full Green Belt review. Therefore it is anticipated that a detailed assessment will be undertaken as part of the evidence base to support the development of the Local Plan Part 2: Land and Planning Policies DPD.</p>	<p>No changes required.</p>
<p>Linden Homes</p>	<p>Findings may be flawed due to methodology applied: Although the basic approach adopted is explained, there is no definition of, or explanation of the</p>	<p>It is considered that the tables provide adequate guidance in relation to criteria for assessing the purposes of the Green Belt. As with all assessments, a professional judgement has to be made</p>	<p>Make text clearer in relation to landscape features.</p>

Consultee	Comment	RBC Response	Amend GBR
	<p>criteria that should be used in effecting that judgement. For example in relation to the purpose of presenting neighbouring towns from merging into one another, it is stated that ‘...a higher score (is given) for areas of the Green Belt that are very narrow; and a lower score for areas that have a wide expanse’.</p> <p>It confuses matters relating to landscape and visual assessment with Green Belt purposes. Although it is noted (correctly), in relation to the purpose of safeguarding the countryside from encroachment that ‘...Whilst landscape quality is not in itself a Green Belt issue...’ it is clear that landscape and visual issues have been included in the assessment, for the paragraph continues ‘... the impact development would have on the role of smaller scale ridges and key landscape features in providing a backcloth to urban areas could be considered as these features are fundamental to appreciation of the open countryside.’ Additionally, in relation to the purpose of preventing neighbouring towns from merging into one another, the Review indicates that part of the judgement involves a consideration of whether development would ‘Erode the visual separation both from distant views and as perceived when travelling between settlements or from within settlements.’ By including landscape and visual matters, the Review is confusing these with the express assessment of Green Belt purposes.</p>	<p>when assessing against the criteria. Each broad location/zone was assessed in a consistent manner against the criteria contained within the assessment table. No change to the methodology is required.</p> <p>Landscape features are not listed specifically as one of the five purposes for including land within the Green Belt. However, as the study itself explains, the impression of settlements merging or degree of countryside encroachment and urban sprawl has as much to do with topography as with the potential of physical development.</p> <p>It is considered that the presence of sites should have no bearing on an assessment of areas against Green Belt purposes.</p>	

Consultee	Comment	RBC Response	Amend GBR
	<p>The way in which the review of Green Belt boundaries has been approached focuses on seeking to assess how different areas/ locations and sites perform against the Green Belt purposes. Given that the Green Belt is established and that it will maintain, in some form in the future, it is considered that to focus on how individual sites perform in terms of Green Belt purposes rather misses the point.</p>		
Bloor Homes	<p>Stage 2(a) approach and findings are generally supported, there are some inconsistencies in analysis however and conclusions which should be amended.</p> <p>Stage 2(a) – Zone 5.3 has similarities to zone 4.5 (substantial buildings there, planning permission for a new business park and hospital) but scoring is different – should be amended. Should be recognition that Airfield would score lower if considered as a discrete zone. Suggested scoring is provided for Zone 4.5: 2/5, 1/5, 3/5, 0/5 (Pillboxes not relevant to this purpose), 1/5</p> <p>Stage 1(a) 5. East of Gamston and North of Tollerton – score in relation to recycling of derelict and other urban land should be 1/5 or 2/5 given existence of significant brownfield land at Nottingham Airport. (Bloor Homes)</p>	<p>It is considered that each broad location/zone was assessed in a consistent manner against the criteria contained within the assessment table. No change to the scoring is required.</p> <p>It is considered that Zone 5.3 and 4.5 have been assessed in a consistent manner. Zone is more open in nature, given that it largely consists of runways; contains more countryside features and is less built up than zone 4.5, therefore the assessment results are considered appropriate.</p> <p>At stage 1(b) the Zone containing Nottingham Airport is scored 2/5 in relation to recycling of derelict and other urban land. At Stage 1(a) this score is 3/5 because the area assessed as this</p>	No changes required.

Consultee	Comment	RBC Response	Amend GBR
		stage is wider and encompasses several Zones which do not contain brownfield sites.	
John A Wells & Nottingham Airport PLC	<p>Stage 1(a) generally support approach and conclusions but consider Area 1 is too broad and doesn't distinguish between land south and east of the existing A453 and land north and west of it. Land south and east relates closely to the built up area, is not at risk of flooding and does not have steep topographical features – should be carried forward for further appraisal.</p> <p>Area between new and old A453 should be removed from the Green Belt.</p> <p>Area 4 – Unclear why this area scores 2/5 in relation to preserving the setting of historic towns, 1/5 considered more appropriate and consistent with scoring in other areas.</p> <p>Area 5 – Should score 1/5 or 2/5 in relation to recycling of derelict and other urban land given existence of significant brownfield land at Nottingham Airport.</p> <p>Stage 1(b) approach and findings are supported.</p> <p>Stage 2(a) approach and findings broadly supported.</p>	<p>Stage 1 (a). It was concluded that the route of the realigned A453 formed the most appropriate boundary between broad area 1 and 2 given the lack of connectivity between the two areas At stage 1(b) the Zone containing Nottingham Airport is scored 2/5 in relation to recycling of derelict and other urban land. At Stage 1(a) this score is 3/5 because the area assessed as this stage is wider and encompasses several Zones which do not contain brownfield sites.</p> <p>Area 4 -The NPPF Green Belt purpose refers to preserving the setting of historic towns; under this purpose, the Council has considered whether development would impact on setting and character of highly valued historic assets. This Area which contains a number of Grade II Listed structures has a score of 1 to reflect the impact on the setting of these pill boxes development would have.</p> <p>Stage 1(b) – acknowledged</p>	No changes required.

Consultee	Comment	RBC Response	Amend GBR
	<p>Zone 2.1 – Not marked on fig 8. Given conclusions in relation to other zones, consider conclusions relating to prevention of neighbouring towns merging and assisting in safeguarding the countryside are too high.</p> <p>Zone 2.3 – Zone relates directly to Zone 2.1 – respective scores in relation to safeguarding the countryside from encroachment should therefore be 3/5.</p> <p>Zone 4.1 and 4.2 – Conclusions considered appropriate but not consistent with conclusions in relation to other zones with similar characteristics – other zones should therefore be amended.</p> <p>Zone 4.3 – Unclear why zone scores differently to 4.2 and 4.1 in relation to safeguarding the countryside from encroachment and checking unrestricted sprawl of built up areas. Zone 4.3 has a closer relationship with built up area than Zone 4.2 – amend score to 0.5</p> <p>Zone 5.3 – Contains Nottingham Airfield – has similarities to Zone 4.5 where scoring is different. Amend scores to 2/5, 1/5, 3/5, 0/5 (existence of Pillboxes is irrelevant) 1/5.</p> <p>Acknowledge that part of the zone (airfield) would score lower if considered as a discrete zone.</p>	<p>Stage 2(a) – acknowledged</p> <p>Area 5, Zone 2.1, 2.3, 4.1, 4.2, 4.3 and 5.3 – do not agree with suggested amended scoring. Scoring methodology is consistent throughout document.</p> <p>Zones have been defined using physical features that could potentially act as future defensible Green Belt boundaries as far as possible, other features such as topographical features have also been used. It should be noted that zones have not been assessed in isolation – e.g. if a zone is physically separate from the existing edge of the PUA, for it to be excluded from the Green Belt would logically also require exclusion of the zone(s) situated between it and the PUA, in which case there would be a cumulative impact in removing both areas and this has been taken into account in the assessments made.</p> <p>Disagree that the impact on the setting of these pill boxes development is irrelevant in terms of scoring when it they are Grade II Listed and have been identified as English Heritage as strong</p>	

Consultee	Comment	RBC Response	Amend GBR
		historic features.	
Gladman Developments	<p>The Council should not be deferring part 2(b) of the Green Belt review to a later stage. This assessment should form part of a full, comprehensive review, undertaken during the period when the Examination is suspended. A full comprehensive Green Belt review would inform the Core Strategy and provide a robust evidence base for distribution of the additional housing numbers.</p> <p>The Core Strategy cannot be said to be sound as it is not 'effective' as without the full Green Belt Review the Council cannot know it has the available land to deliver the revised proposals.</p> <p>Absence of a consideration of 'safeguarded land' - without the full Green Belt review there is no clarity over there 'safeguarded land' will be, therefore no flexibility to provide additional land to accommodate development if the SUEs do not deliver.</p> <p>When and where will the re-defined Green Belt boundary resulting from this Green Belt review be produced. Once produced this should be subject to further consultation.</p>	<p>The Green Belt review is phased to reflect the phased approach to the Local Plan process. This approach was adopted given the advanced stage of the Core Strategy; to ensure that the Core Strategy and therefore strategic site allocations can be adopted in as short a period time as possible, rather than beginning afresh on a Local Plan which whilst this would incorporate non-strategic site allocations would take a much longer period of time to produce and therefore delay the adoption of a plan further.</p> <p>The concept of a 2 stage review process was debated at the Technical Meeting held with the Inspector on 9th April 2013. At this stage it was agreed that the first elements of the Green Belt review would be completed before the end of April. Whilst there was some debate as to the merits of a two stage process, with some members of the audience endorsing the approach and others having some concerns, the Inspector herself did not at that point indicate that the Council's planned approach was</p>	

Consultee	Comment	RBC Response	Amend GBR
		<p>unacceptable.</p> <p>Impact on the purposes of the Green Belt is only one consideration in relation to decision making on site selection for development. Other factors are appraised in the Tribal studies, which identifies suitable directions for growth around settlements, and on a site specific basis within the Strategic Housing Land Availability Assessment, which concludes on a number of Green Belt sites that they may be suitable in principle if policy changes.</p> <p>Re-defined Green Belt boundaries will be set out in the modifications to the publication Core Strategy, there will be an opportunity to comment on these modifications; all comments will be forwarded to the Inspector for her consideration.</p> <p>It is role of the Local Plan not the review to decide whether land should be safeguarded or not. The review can only inform this process, which it does.</p>	
TABU and Tollerton Parish	Agree with recommendations to leave Bassingfield washed over by the Green Belt and Tollerton inset from the Green Belt.	Noted	No changes required.

Consultee	Comment	RBC Response	Amend GBR
Council			
Gotham Parish Council	<p>Rushcliffe use the NPPF criteria that distinguished Green Belt land from other land as the only assessment criteria. Ignores the value of the land itself e.g. as landscape and for agriculture. Rushcliffe uses no weighting in its scoring system nor provide any sensitivity analysis.</p>	<p>Landscape quality is not in itself a Green Belt issue, however the impact development would have on the role of smaller scale ridges and key landscape features in providing a backcloth to urban areas could be considered as these features are fundamental to appreciation of the open countryside.</p> <p>Allocations of land need to be informed by a number of evidence sources. These include the Green Belt Review, the Greater Nottingham Landscape Character assessment, Tribal's Appraisal of Sustainable Urban Extensions, which identifies Grade 2+ agricultural land.</p> <p>The scoring system does not consider agricultural land value as this is not one of the five purposes of the Green Belt. This is however considered as part of the wider Sustainability Appraisal of the Core Strategy.</p> <p>The NPPF does not suggest that greater importance should be given to one Green Belt purpose over another and therefore no weighting has been</p>	No changes required

Consultee	Comment	RBC Response	Amend GBR
		applied.	
Linden Homes	Issue to be considered is how the residual Green Belt i.e. the areas that would remain should specific sites be taken out of the Green Belt perform in relation to the purposes.	It is not considered necessary to implement this suggestion at the current time. If exceptional circumstances arise which warrant a further review of the Green Belt in the future, then reassessments will be undertaken to reflect this.	No changes required
TABU	<p>Review assumes that it has already been established that there are exceptional circumstances even though it is the remit of the Local Plan process to whether exceptional circumstances apply. Any review of the Green Belt should be based on the fundamental aim of the Green Belt as quoted above, measured against the five purposes. This should mean that no criteria other than these five purposes should be considered or given any weight in reaching any Green Belt Review recommendations.</p> <p>Do not believe factors affecting Green Belt status of areas in Rushcliffe are so different from factors in other authorities that a review in Rushcliffe is required when no review is required in other authorities' areas.</p>	<p>Section 2 of the GBR sets out background information relating to housing need and land availability within Rushcliffe and provides that sites within the Green Belt are required in order to meet this need due to limited non-Green Belt opportunities for further development adjacent to the main built up area of Nottingham and around some of Rushcliffe's more sustainable settlements. The Borough Council considers this to constitute 'exceptional circumstances' necessitating a change to Green Belt boundaries hence the need for a Review. It is for the Inspector examining the Local Plan to ultimately decide whether these circumstances do in fact constitute exceptional circumstances.</p> <p>Section 2 therefore provides the context</p>	

Consultee	Comment	RBC Response	Amend GBR
		<p>for the Green Belt Review. The Review itself is a technical document which will aid decisions on where the Green Belt may be amended to accommodate these future development requirements.</p> <p>Whilst it is acknowledged that the review should not consider factors other than the 5 Green Belt criteria when assessing the importance of areas in Green Belt terms, it seems expedient to discount areas where an absolute barrier to development is evident.</p> <p>The Inspector charged with examining Rushcliffe's Local Plan considers that it is necessary to demonstrate that the Green Belt impacts of the plan proposals have been fully considered through a Green Belt Review. It is for the Inspector to ultimately decide whether the same issue applies to those other authorities within the HMA.</p>	
Trustees of Johnson Giltwood & Co	Would suggest that the second stage of the review including the Key Settlements needs to be brought forward and undertaken now. This will ensure that the first part of the Core Strategy is deliverable i.e. sufficient land can be made available to accommodate the requisite numbers. Response goes on to set out detail on specific sites in	The Green Belt review is phased to reflect the phased approach to the Local Plan process. This approach was adopted given the advanced stage of the Core Strategy; to ensure that the Core Strategy and therefore strategic site allocations can be adopted in as	

Consultee	Comment	RBC Response	Amend GBR
	Radcliffe on Trent – SHLAA sites 183 and 184	<p>short a period time as possible, rather than beginning afresh on a Local Plan which whilst this would incorporate non-strategic site allocations would take a much longer period of time to produce and therefore delay the adoption of a plan further.</p> <p>Site specific issues and detailed changes around Key Settlements in or adjacent to the Green Belt such as Radcliffe will be dealt with through the Local Plan Part 2: Land and Planning Policies DPD.</p> <p>The concept of a two stage review process was debated at the Technical Meeting held with the Inspector on 9th April 2013. At this stage it was agreed that the first elements of the Green Belt review would be completed before the end of April. Whilst there was some debate as to the merits of a two stage process, with some members of the audience endorsing the approach and others having some concerns, the Inspector herself did not conclude that the Council's planned approach was unacceptable.</p> <p>The trajectory to the Local Plan Part 1:</p>	

Consultee	Comment	RBC Response	Amend GBR
		Core Strategy provides that the sites can deliver the numbers required per annum to meet the housing requirement. It is the Inspector's decision as to whether she agrees with these conclusions.	
Redrow Homes	The 2010 study notes that East Leake is a very sustainable settlement beyond the Green Belt. The 2012 SHLAA identifies a number of sites that are suitable for development and is in excess of the 400 proposed in the submitted strategy. Whilst there is clearly a need for a Green Belt review to accommodate the greater proportion of the extra homes needed, the review should not expect to accommodate all of the additional housing, when there is capability in sustainable sites beyond the Green Belt. The Green Belt review is therefore going beyond what is necessary for a review of the Green Belt, by underestimating the role of the sustainable settlements beyond the Green Belt.	Given that the shortfall of housing will meet the wider need of Nottingham City, it is considered appropriate to undertake a Green Belt Review around the edge of the Nottingham built up area (within Rushcliffe) when taking into account wider sustainability considerations such as reducing the need to travel. The sustainability appraisal identifies that a strategy of urban concentration is the most appropriate, with smaller scale development focussed around the main rural settlements within Rushcliffe. The Inspector specifically stated during the exploratory meeting that the Council should revisit sustainable urban extensions, not open up the whole strategy for debate (see notes of the exploratory meeting).	No changes required.
Derbyshire County Council	It is welcomed that the GBR incorporates the findings of the Nottingham-Derby Green Belt review and uses a similar methodology to assess more specific broad areas of the Green Belt in the	Noted	No changes required.

Consultee	Comment	RBC Response	Amend GBR
	Borough.		
Heaton Planning	Key Settlements such as Keyworth should form part of the Green Belt Review.	<p>The Green Belt review is phased to reflect the phased approach to the Local Plan process. This approach was adopted given the advanced stage of the Core Strategy; to ensure that the Core Strategy and therefore strategic site allocations can be adopted in as short a period time as possible, rather than beginning afresh on a Local Plan which whilst this would incorporate non-strategic site allocations would take a much longer period of time to produce and therefore delay the adoption of a plan further.</p> <p>Site specific issues and detailed changes around Key Settlements in or adjacent to the Green Belt such as Keyworth will be dealt with through the Local Plan Part 2: Land and Planning Policies DPD.</p> <p>The concept of a 2 stage review process was debated at the Technical Meeting held with the Inspector on 9th April 2013. At this stage it was agreed that the first elements of the Green Belt review would be completed before the end of April. Whilst there was some</p>	No changes required.

Consultee	Comment	RBC Response	Amend GBR
		<p>debate as to the merits of a two stage process, with some members of the audience endorsing the approach and others having some concerns, the Inspector herself did not at that point indicate that the Council's planned approach was unacceptable.</p>	
<p>Bunny Parish Council</p>	<p>The Council wish to object to a change from washed over to inset status for Bunny. Insufficient to rely on restricted conservation area to prevent development and other factors such as need and sustainability.</p>	<p>Council considers that insetting Bunny is in line with NPPF Para 86.</p>	<p>No changes required.</p>
<p>East Leake PC</p>	<p>Would particularly oppose release of land along road between East Leake and Ridgeway and between Ridgeway and the main built up area of Gotham</p> <p>East Leake PC would wish to contribute to discussions when inset boundaries are drawn up for Gotham and Bunny.</p> <p>Additional measures to preserve rural setting and prevent coalescence would be welcomed i.e. establish 'green wedges' to maintain separation from West Leake and Costock, potentially also Rempstone and Stanford.</p>	<p>Site specific issues will be dealt with through the Local Plan Part 2: Land and Planning Policies DPD. Formal consultation will be carried out in relation to this document so the opportunity to contribute will be available.</p> <p>More detailed aspects in terms of Green Infrastructure, and more detailed policies will come forward as part of Local Plan Part ii, Site Allocations and Development Management policies. In addition, additional measures could be considered through policies in a Neighbourhood Plan, so long as the policy is in accordance with the National Planning Policy Framework, and the</p>	<p>No changes required.</p>

Consultee	Comment	RBC Response	Amend GBR
		final Core Strategy.	
Bradmore Parish Council	Bradmore would like to retain the washed over status of the village. The Conservation Area does not cover the whole village and does not protect it as a whole	Council considers that inseting the core of Bradmore is in line with guidance within NPPF at Para 86.	No changes required.
National Federation of Gypsy Liaison Groups	The review also needs to consider the issue of Gypsy and Traveller provision	The Review is a technical document which is used to aid decisions on where the Green Belt may be amended to accommodate these future development requirements, Gypsy and Traveller provision is outside the remit of the Review.	No changes required.

Other comments

Comment	RBC Response	Amend GBR
The decision not to extend the Green Belt should be re-examined.	See paragraph 4.44 of the Green Belt Review	No changes required.
No definition of gradings 1-5	Table 7 sets out the criteria used to grade each zone.	No changes required.
Object to figure 9, page 101- it's the whole landscape that matters.	Landscape quality is not in itself a Green Belt issue, however the impact development would have on the role of smaller scale ridges and key landscape features in providing a backcloth to urban areas could be considered as	No change required.

Comment	RBC Response	Amend GBR
	<p>these features are fundamental to appreciation of the open countryside.</p> <p>The Green Belt Review will need to be considered in the light of other evidence such as the Landscape Character Assessment.</p>	
<p>Map on page 106 doesn't include most of the Environmental Designations in the Clifton Area</p>	<p>Sites of Special Scientific Interest, Country Parks, Local Nature Reserves and Sites of Importance for Nature Conservation (which are national and local wildlife designations respectively) are identified on the plan.</p>	<p>Title to plan to be amended to clarify types of environmental designations.</p>
<p>Detailed review required at Cotgrave Colliery and Newton</p>	<p>See Para 5.20 of the Green Belt Review</p>	<p>No changes required</p>
<p>Green Belt currently limits new sites near Cotgrave village centre that would be perfect to build on, which would have no detriment on the amenity of the village. Support review of Green Belt around Cotgrave.</p>	<p>Noted. Site specific issues and detailed changes around Key Settlements such as Cotgrave will be dealt with through the Land and Planning Policies DPD.</p>	<p>No changes required.</p>
<p>Scores for Green Belt importance for zones around Tollerton are all too low for urban sprawl, coalescence, safeguarding the countryside from encroachment and historic setting. Not all Green Belt reviewed at same level of detail.</p>	<p>No alternative scoring suggested or justification given for comment.</p> <p>It is considered that each broad location/zone was assessed in a</p>	<p>No changes required.</p>

Comment	RBC Response	Amend GBR
	<p>consistent manner against the criteria contained within the assessment table. No change to the scoring is required</p>	
<p>Scoring system must be independent of housing need or proposed allocations.</p>	<p>The need for a Green Belt review has been triggered in order to accommodate development requirements for the plan period and potentially beyond. The scoring system does not consider housing need or the proposed allocations, however the review does note where land is being promoted for development through the SHLAA and any revisions to the Green Belt through the policies map will have some regard to the availability of land for development.</p>	<p>No changes required.</p>
<p>Inspector said that the plan should not be approved until the Green Belt review was complete, and the review should precede the choice of sites, not the other way round.</p>	<p>The Green Belt review is phased to reflect the phased approach to the Local Plan process. This approach was adopted given the advanced stage of the Core Strategy; to ensure that the Core Strategy and therefore strategic site allocations can be adopted in as short a period time as possible, rather than beginning afresh on a Local Plan which whilst this would incorporate non-</p>	<p>No changes required.</p>

Comment	RBC Response	Amend GBR
	<p>strategic site allocations would take a much longer period of time to produce and therefore delay the adoption of a plan further.</p> <p>The concept of a 2 stage review process was debated at the Technical Meeting held with the Inspector on 9th April 2013. At this stage it was presented that the first elements of the Green Belt review would be completed before the end of April. Whilst there was some debate as to the merits of a two stage process, with some members of the audience endorsing the approach and others having some concerns, the Inspector herself did not at that point indicate that the Council's planned approach was unacceptable.</p>	
<p>Assessment does not take account of agricultural land value. South of Clifton scored too low in relation to checking unrestricted sprawl, preventing merging towns and safeguarding countryside from encroachment.</p>	<p>The scoring system does not consider agricultural land value as this is not one of the five purposes of the Green Belt. This is however considered as part of the wider Sustainability Appraisal of the Core Strategy; Grade II agricultural land is also identified within Tribal Appraisal of Sustainable Urban Extensions study,</p>	<p>No changes required.</p>

Comment	RBC Response	Amend GBR
	<p>and is considered as part of the assessment of broad areas and more detailed assessments of sites.</p> <p>No alternative scoring suggested or justification given for opinion that scores are too low.</p>	
<p>2006 Green Belt Review has formed the basis for this review, do not accept judgements of this</p>	<p>The 2006 review was undertaken to support the spatial strategy of the East Midlands Regional Plan and its conclusions were considered robust. It is therefore considered appropriate to use this review as a starting point for a Rushcliffe specific review of the Green Belt</p> <p>It forms only one element of the evidence which supports this Green Belt Review; the Council has also relied on the Tribal Studies, the guidance contained within the NPPF and used this evidence base to draw its own conclusions based on desk based assessment and visits to relevant areas.</p>	<p>No changes required</p>
<p>Applying RBC's methodology to small parcels of land rather than the total area will give different results. If Zones 5.1 and 5.2 were</p>	<p>Zones have been defined using physical features that could potentially act as</p>	<p>No changes required.</p>

Comment	RBC Response	Amend GBR
<p>considered together for example, the overall score would be a lot higher</p>	<p>future defensible Green Belt boundaries as far as possible, other features such as topographical features have also been used. It should be noted that zones have not been assessed in isolation – eg if a zone is physically separate from the existing edge of the PUA, for it to be excluded from the Green Belt would logically also require exclusion of the zone(s) situated between it and the PUA, in which case there would be a cumulative impact in removing both areas and this has been taken into account in the assessments made.</p>	
<p>Part of Stanton immediately adjacent to Keyworth, should reviewed in the same way at the same time</p>	<p>Site specific issues and detailed changes around Key Settlements will be dealt with through the Land and Planning Policies DPD. Stanton however is not designated as a Key Settlement given its size and form.</p> <p>Representations should be made to the Core Strategy consultation on this point rather than the Green Belt Review. It is not considered necessary therefore to review the Green Belt boundary at this</p>	<p>No changes needed.</p>

Comment	RBC Response	Amend GBR
	location at the present time.	
Review only seems to take account of coalescence of current villages but not the proposed ones. Issue of coalescence with Tollerton Park settlement has been ignored.	<p>Whilst no guidance is provided in the NPPF, Tollerton Park is not a 'named settlement for the purposes of 'preventing neighbouring towns merging into one another'.</p> <p>It is only possible to consider coalescence of existing settlements, not those which may/may not exist in future.</p>	No changes required.
The whole of zone 4.2 should be removed from Green Belt, allowing for windfall sites to the north	4.2 – Acknowledged	No changes required.
Tollerton is not mentioned in “Overall Conclusions for Broad Area B – Rushcliffe Mid”.	Error to be amended.	Amend conclusions to broad Area B – Rushcliffe Mid to include conclusion for Tollerton.
Broad Location 5 has been divided into zones in an almost arbitrary way since many of the boundaries (e.g. Little Lane) are not significant, sustainable or defensible features. Different results would be obtained if the zoning was done differently.	Zones have been defined using physical features that could potentially act as future defensible Green Belt boundaries as far as possible, other features such as topographical features have also been used. It should be noted that	No changes required.

Comment	RBC Response	Amend GBR
	<p>zones have not been assessed in isolation – e.g. if a zone is physically separate from the existing edge of the PUA, for it to be excluded from the Green Belt would logically also require exclusion of the zone(s) situated between it and the PUA, in which case there would be a cumulative impact in removing both areas and this has been taken into account in the assessments made.</p> <p>It is considered that each broad location/zone was assessed in a consistent manner against the criteria contained within the assessment table. No change to the scoring is required</p>	
<p>Would be best to leave Tollerton zone 5.1 in the Green Belt, remove zones 5.2 and 5.4 and not remove 5.3.</p>	<p>5.1 – Acknowledged</p> <p>5.2 – Acknowledged</p> <p>5.3 – No justification given for keeping zone within the Green Belt</p> <p>5.4 – Acknowledged</p>	<p>No changes required</p>
<p>4.1 Agree 4.2 Agree 4.3 Present proposed plans acceptable as long as wood, Parkland buffer and ridgeline are protected from</p>	<p>4.1, 4.2, 4.5, 4.6, 4.8, 4.9, 4.10 –</p>	<p>No changes</p>

Comment	RBC Response	Amend GBR
<p>development. 4.4/4.7 agree but needs protection from development 4.5 agree. 4.6 agree. 4.8 agree. 4.9 agree. 4.10 agree. 4.11 feel this could be removed from Green Belt and developed.</p>	<p>Acknowledged</p> <p>4.3 – Noted</p> <p>4.4/4.7 – Noted</p> <p>4.11 – no justification given for removing zone</p>	<p>required.</p>
<p>I can see the need for sections 2.1 & 2.3 being removed from the Green Belt. Section 2.2 is too vast an area to remove from the Green Belt and I feel the southern Boundary should be where a tributary of Fairham Brook travels East from Nottingham Road map ref. SK539317 joining the brook at map ref. SK552321. This would provide a defensible boundary and guard against any coalescence between Clifton and Gotham Section 2.4 should REMAIN as Green Belt to protect the countryside and Thrumpton from urban sprawl</p>	<p>2.1 and 2.3 – Acknowledged</p> <p>2.2 – Acknowledged</p> <p>2.4 – Acknowledged</p>	<p>No changes required</p> <p>Comments will be taken into consideration when boundaries are finalised.</p>
<p>East of Clifton/north and west of Ruddington area 2b might offer some potential of re-assessment and provision</p>	<p>No justification given for this suggestion</p>	<p>No changes required</p>