

Response Form

Your Details		Agent details (where applicable)
Mr T Dickens	Name	Matt Hubbard
c/o Agent	Address	The Planning Hub Jubilee House 79 Gertrude Road West Bridgford Nottingham NG2 5DA
	E-mail	o

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

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

It is considered that, in following the guidance contained within paragraph 85 of the NPPF, the methodology for identifying the 'inset' village boundaries are appropriate for this scale of village. It is accepted that the smaller villages identified in paragraph 2.1 of the Green Belt Review Part 2 (b) are suitable to be 'inset' villages.

(please continue on a separate sheet if necessary)

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

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

We agree with the suggested inset boundaries shown, as these appear to be logical and would appear to allow for minor infill developments and the redevelopment of brownfield sites where feasible.

(please continue on a separate sheet if necessary)

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

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

We are of the belief that, after 19 years, the established Green Belt boundaries are out of date and need revising accordingly in order to meet the requirements on the NPPF.

As stated in paragraph 3.2 of the Green Belt Review Part 2 (b) the existing Green Belt boundary '...does not necessarily follow boundaries or features on the ground and includes land that no longer contributes to the openness of the Green Belt'. This paragraph goes on to state that 'An important objective of this Green Belt Review is to ensure the edge of settlements follows an appropriate boundary which is defensible and offers a degree permanence'.

We are entirely happy with this methodology providing that the same methodology is used in the same manner for all sites that the Council are taking into consideration in this process. If this is the case the Green Belt boundary can be brought up to date in a logical and reasonable manner across the Borough.

(please continue on a separate sheet if necessary)

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

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

We have no comments to make regarding the suggested minor amendments to the existing settlement boundaries.

(please continue on a separate sheet if necessary)

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

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

Again, we do not disagree with the methodology, especially as this is '*...based on sustainability grounds and impact on the purposes of including land generally in the Green Belt*' (Para 4.1).

On behalf of my clients we have no concern in how the assessment deals with Bingham, Cotgrave, Keyworth or Ruddington, but are concerned with how this affects Radcliffe.

In response to paragraph 4.3 of the Green Belt Review Part 2 (b) we specifically note that the review of the 'key settlements' has been undertaken in order to identify areas for growth according to identifiable boundaries (e.g. roads and railway lines). As the Council are taking this sensible stance, and are also seeking to ensure that the revised Green Belt Boundary follows an '*appropriate boundary which is defensible and offers a degree of permanence*' as referred to in Section 3 above, there remains scope for the Council to reconsider the Green Belt boundary to the south of Radcliffe on Trent accordingly, without any dilution of the purposes of the Green Belt, as set out in paragraph 80 of the NPPF.

(please continue on a separate sheet if necessary)

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

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

We disagree with this assessment. Our comments below are limited to the Radcliffe on Trent Strategic Green Belt Areas, specifically the 'Radcliffe South West' (RSW) area, and not the other strategic areas of the SHLAA sites.

Our first issue with the RSW area is that the purple area assessed, as shown on the plan on page 102 of the Green Belt Review Part 2 (b) does not appear to extend all the way up to the south

west edge of Cropwell Road which, in our opinion, would be a logical, appropriate and defensible boundary, as referred to in paragraphs 3.2 and 4.3 of the Green Belt Review Part 2 (b) (see above) and as guided by the NPPF. We see no logical reason as to why the LPA would consider the removal of the Green Belt from the fields and open land to the south west of the dwellings that front this side of Cropwell Road, but not remove the Green Belt from 'washing over' the actual dwellings and built form itself, which surely has the '...degree of permanence' as desired by the LPA.

In our opinion the retention of this short ribbon of development along Cropwell Road *within* the Green Belt has no benefit whatsoever to the Green Belt and the 'purposes' for it, as defined in paragraph 80 of the NPPF. Encompassing these dwellings within the Green Belt does nothing to 'check the unrestricted sprawl of large built up areas' that cannot be adequately controlled by other planning policy. It does nothing to prevent neighbouring towns merging into one another, as there are no other settlements nearby. It does not help in 'safeguarding the countryside from encroachment' as these dwellings already have permanent and defensible boundaries. It does nothing to preserve any heritage assets and it does nothing to assist with urban regeneration.

These points are mirrored in the scores that the Council have apportioned the RSW site in the Green Belt Review Part 2 (b) (on pages 119 & 120 of that document), where the overall Green Belt Score is 13 – representing a Low-Medium score in terms of 'Green Belt Importance'.

We are not of the opinion that the whole of the RSW site should be removed from the Green Belt, as any resulting development towards the northern end of the site (to the south of the A52) would be seen as an encroachment in to the open countryside, as identified in paragraph 4.207 of the Green Belt Review Part 2 (b). However, there IS clear logic in removing the Green Belt from washing over the dwellings on Cropwell Road, for the reasons stated previously.

The attached aerial photograph shows how, if the existing permanent and defensible boundaries to the dwellings is followed, the boundary of the Green Belt could be revised.

The LPA will be aware that many of these dwellings have been extended in the past, and there have been numerous applications for domestic extensions and developments refused on Green Belt grounds, which severely hampers individual's rights to develop and also puts unwarranted pressure on the LPA to resist development, where it would normally be wholly acceptable.

The logical and 'common sense' approach here would be to continue to safeguard the open countryside from inappropriate development by retaining the Green Belt over the vast majority of the RSW site, but removing the Green Belt from the short row of dwellings that fronts Cropwell Road, as shown on the attached photograph.

(please continue on a separate sheet if necessary)

7. Please provide any others comments you wish to make

We have no further comments to make.

(please continue on a separate sheet if necessary)

Signed:

M. Hubbard

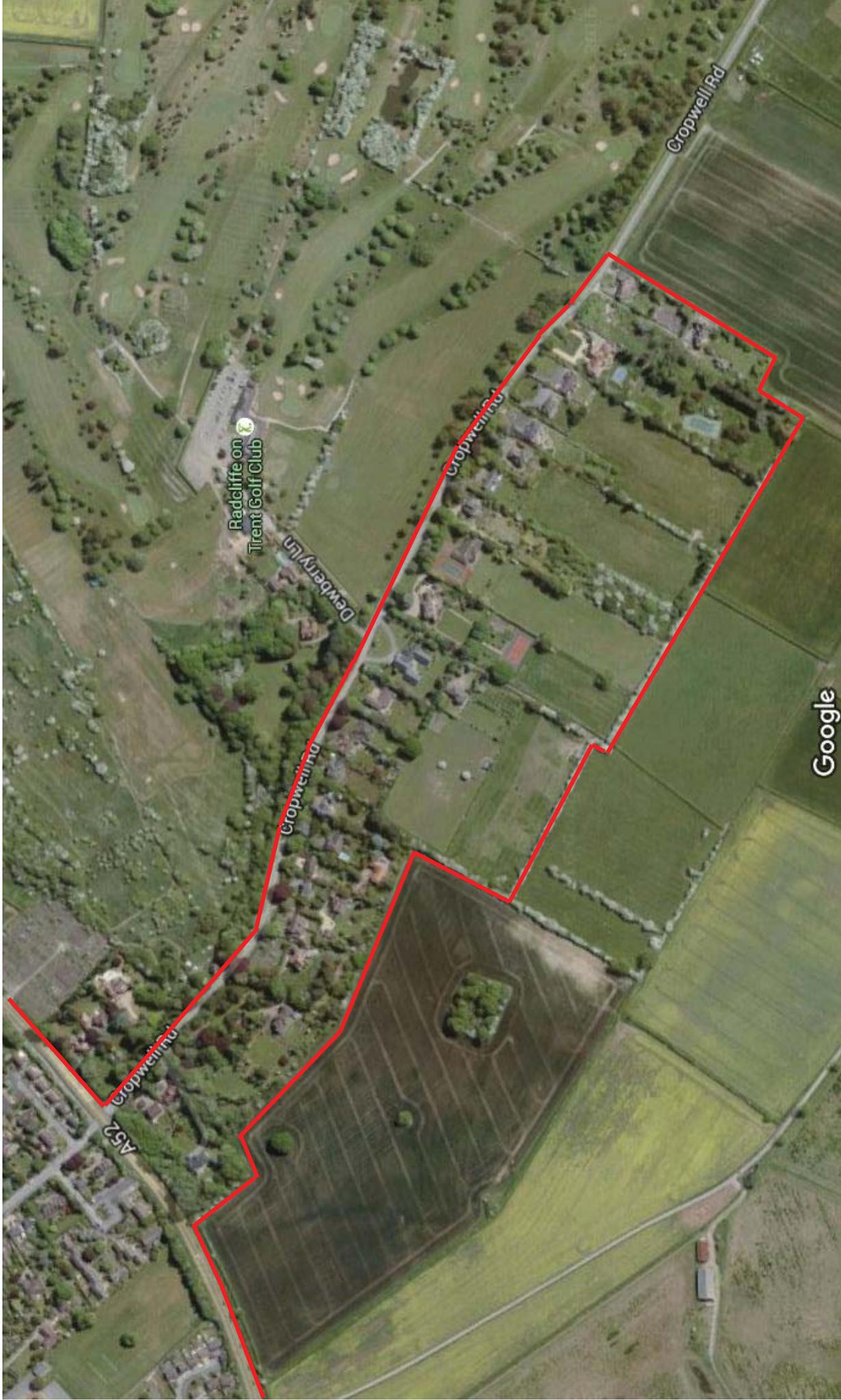
Date:

24th March 2016

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

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

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



Suggested Revision to the Green Belt Boundary to the south of Radcliffe on Trent, which clearly follows 'appropriate' and 'defensible' boundaries and, in accordance with paragraph 85 of the NPPF, does not include land that is unnecessary to keep open (i.e. garden land) and defines the boundary of the Green Belt by using physical features (i.e. garden boundaries) that are readily recognisable and likely to be permanent.