

### Green Belt Boundaries General Approach Consultation (EX223)

1. The new Green Belt extent advocated in the documentation (EX223) simply reflects amendments from the additional sites submitted by the council to the process. The development potential of “washed-over” settlements has again been ignored, even after specific requests made by the Inspector, and so the local authority is using it as a reason to restrict the supply of housing and artificially reduce their OAN.
2. Their chosen position; that they can only meet a higher OAN with the inclusion of Symondshyde is not evidenced by the SASEA process, hence does not reflect an appropriate strategy or indeed the “most appropriate strategy” as advocated in the NPPF (2012). This is especially true with the evidence presented in document EX228: *Note on SP24 Symondshyde*, within which, the Council does not support its allocation and illustrates its potential impact on the landscape and Green Belt.
3. Alternative approaches to Green Belt release should be investigated. It is unclear how these sites have been selected, without a coherent strategy, based on an up-to-date SASEA process, other than subjective choice.
4. Rejecting consideration of washed over settlements by equating their Green Belt status with their sustainability is in conflict with national policy. This approach has subsequently constrained the ability of the Council to deliver their full OAN and to identify a rational five-year housing land supply, which is reliant upon immediately deliverable short and medium term sites. With an OAN of circa 800/ yr the authority has not been able to illustrate a 5YLS since the plan was submitted for examination and this is not likely to change unless a more positive approach is taken to this categorisation of site. Dismissing them is in conflict with para. 86 of the 2012 NPPF which advises:  
  
*“If it is necessary to prevent development in a village primarily because of the important contribution which the open character of the village makes to the openness of the Green Belt, the village should be included in the Green Belt. If, however, the character of the village needs to be protected for other reasons, other means should be used, such as conservation area or normal development management policies, and the village should be excluded from the Green Belt”.*
5. We are pleased to see that the Inspector is assessing the potential of washed over settlements and the associated sites within and adjoining these settlements, based on their sustainability and potential impact on the Green Belt as set out in national policy.