Chris Wedgwood. Statement 2.

Previously I have explained that Topic Paper 1 Addendum has followed a 2 stage process of defining the Green Belt boundary and that a large area of land was arbitrarily removed in Stage 1 without any evidence to support it's removal.

At stage 2 the Council seeks to further remove specific sites from the Green Belt based on a claim that these sites are needed for required development within the plan period.

It is a requirement that the Council consider all reasonable alternatives to the sites which it proposes to remove but the Council has failed to correctly do so.

Because the output from stage 1 has been taken as the input to stage 2 the land removed in stage 1 has not been assessed as reasonable alternatives to the sites being proposed for removal in stage 2.

Given the position of this land it would reasonably be expected that some of it would be in a more sustainable location than the sites selected for removal in Stage 2.

The use of this 'temporary' Green Belt boundary in Stage 1 is not NPPF compliant since the Plan should only create the Green Belt boundary after consideration of all the relevant evidence (including that presented in stage 2), and any Green Belt boundary created must be expected to endure beyond the plan period.

The temporary Green Belt boundary created in stage 1 will not endure beyond stage 2.

Therefore land cannot have been removed through the imposition of a Green Belt boundary at stage 1 such that it is not accessible to further evaluation at Stage 2.

The only possible conclusion is that the plan has not considered all reasonable alternatives and is unsound.