

Appellant's Response to rID241.02

1. The rule 6 party is wrong to suggest that if the site were considered to be grey belt it would undermine matters relied on by the Appellant relating to the time limited nature of the development, the restoration of the site and the biodiversity net gain. As set out in (i) the Appellant's closing (rID240.01), (ii) the Unilateral Undertaking (rID227.03) and (iii) discussed at the Inquiry, all those matters would be secured for the long term (at least 30 years) as part of the permission granted. This would be independent of any policy protection and would obviously be unaffected by whether or not the site is considered to be grey belt or not.
2. The rule 6 party's comments relating to the contribution the site makes to Green Belt purposes are disputed for the reasons already set out in rID240.01, paras 13 to 15, 29 to 37 and 40 and rID243.02
3. The rule 6 party's comments relating to sustainability are inappropriate and are resisted for the reasons set out in rID240.01, paras 131 and 180 - 182