

ID 10

SHROPSHIRE LOCAL PLAN EXAMINATION

Representor unique Part A Ref *	A0682
Matter	6
Relevant questions nos	1, 2, 3, 4, 5, 6, 7, 8, 9, 10

Stage 1 Hearing Statement

Matter 6 Hearing Statement: Green Belt and Safeguarded Land (Policy SP11)

Miller Homes (A0682)

1.1 This Hearing Statement is submitted on behalf of Miller Homes (Miller).

Context: South West Shifnal

1.2 Miller’s representations are made in relation to c.65ha of land it is promoting at “South West Shifnal” as identified on the site location plan at **Appendix 1**. Policy SP11 will release this land from the Green Belt and safeguard it for future development needs.

1.3 South West Shifnal comprises three of the named parcels in Schedule S15.1(iii), as identified within Figure 1.1:

- “Land between A464 (south) and Park Lane” (9.6ha) (*pink*);
- “Land between Park Lane and A4169 at Lodge Hill” (46.1ha) (*purple*); and
- “Land between A4169 and the western railway line” (12.8ha) (*blue*).

Figure 1.1: Policy SP11 Safeguarded Land Parcels



- 1.4 At Regulation 19 stage, South West Shifnal was promoted by Miller (A0682) and Wallace Land Investments (A0147). Both parties promoted their land interests separately although a coordinated approach was adopted in terms of a comprehensive masterplan¹ to reflect the safeguarded designation. Miller acquired the Wallace Land Investments business in May 2021, so South West Shifnal is now being promoted in its entirety by Miller. This demonstrates the deliverability of the land as a whole which is supported by a national house builder.
- 1.5 Miller strongly supports the designation of South West Shifnal under SP11 as safeguarded land.
- 1.6 The Draft Local Plan acknowledges that South West Shifnal will eventually comprise a “...strategic housing extension capable of creating a new community...” and explicitly lists benefits and infrastructure improvements (Paragraphs 5.215 and 5.216).
- 1.7 No other safeguarded site has been similarly identified in the Draft Local Plan which properly reflects its credentials as a sustainable site which can deliver strategic benefits for Shifnal, as recognised in Paragraph 5.217 of the Draft Local Plan.
- 1.8 Miller contends that the Local Plan should include a policy mechanism (either within SP11 or a new policy) to permit delivery and development of safeguarded land during the plan period in the event that issues arise with housing delivery including shortfalls in deliverable housing land supply throughout the plan period, a failure to meet the Housing Delivery Test or where it becomes clear that the housing requirement cannot be met. This is explained in response to Question 7 below.
- 1.9 Miller also consider that land at South West Shifnal be allocated in the Local Plan for residential-led development during the plan period; this case will be presented during Stage 2 of the Examination.
- 1.10 Miller’s responses to the Matter 6 Questions 1, 2, 3, 4, 5, 6, 7, 8, 9 and 10 are set out below. We have provided a combined response for Questions 1-5.

1: What is the basis of the Green Belt Review? What methodology has been applied and is it soundly based? Is the Council’s approach to the Green Belt assessment robust and in line with national guidance?

2: Has a comprehensive assessment of capacity within built up areas been undertaken? How have all potential options on non-Green Belt land in the countryside been assessed and discounted?

3: Have opportunities to maximise capacity on non-Green Belt sites been taken (including increasing densities)?

5: How have the conclusions of the Green Belt Review informed the Local Plan? Do decisions on Green Belt releases reflect the need to promote sustainable patterns of development,

¹ Joint Development Framework Document (DFD)

**and prioritise sites which are previously developed and/or well served by public transport?
Where is this evidenced?**

- 1.11 The Green Belt Topic Paper (GC4g) addresses these questions in detail. We consider the principal points to be as follows:
- Paragraph 3.48 of the SAMDev (SD015) committed the Council in 2015 to a detailed review of the Green Belt boundary as part of an early review of the Local Plan in order to identify long-term sustainable growth options (provisionally 2016-2036). The Council adopted a proactive approach to this commitment by undertaking the Green Belt review at the outset of the Local review;
 - The Development Strategy has been formulated and adopted on the basis of proportionate evidence and effective consultation. The Evidence Base and consultation with neighbouring authorities has considered all other reasonable options to Green Belt release (NPPF. Paragraph 141);
 - The role of settlements and review of Green Belt boundaries has been determined based upon the Sustainability Assessment (SD006) and Development Strategy (NPPF Paragraphs 142 and 143a), having regard to sustainability, technical constraints and Green Belt harm; and
 - The Green Belt review process has informed the Council's consideration of the longer term needs of settlements beyond the plan period and it has accordingly safeguarded land for this purpose. This is precisely what NPPF Paragraph 143 requires and will ensure that Green Belt boundaries endure beyond the plan period (NPPF Paragraph 140).
- 1.12 The methodologies adopted for the Green Belt Assessment (EV049) and Review (EV050) are tried and tested, being devised and completed by a consultant with a national track record on this subject (LUC) on behalf of the Council:
- EV049 was informed by Duty to Co-operate engagement as well as other assessments examined for other local plans across the Midlands. It comprised an independent "policy off" assessment at the "Issues and Options" stage (EV003.01) (it was not informed by a preferred Development Strategy).
 - EV050 assessed the potential harm of releasing Green Belt for development in strategic locations. It was completed following the Reg. 18 "Preferred Scale and Distribution of Growth" consultation (EV004) when a preferred Development Strategy had been identified. It provided one aspect of the evidence which helped to inform the Preferred and Strategic Site consultations in 2018 and 2019 respectively (EV005 and EV006).
- 1.13 The approach to Green Belt review and assessment is firmly supported as being sound and in full accordance with national policy, including examining fully all other reasonable options and promoting a sustainable pattern of development (NPPF Paragraphs 141 and 142). This includes the identification of land for safeguarding within the plan period to preserve the inner boundary of the Green Belt.

4: Have discussions taken place with neighbouring authorities about whether they could accommodate some of Shropshire’s identified housing and employment land needs?

- 1.14 Yes – the Green Belt Topic Paper (GC4g) sets out in considerable detail the discussions held and correspondence exchanged with neighbouring authorities through the Duty to Co-operate to explore the potential for Shropshire’s needs to be met in other authority areas. This is also set out in the Green Belt Revised Exceptional Circumstances Statement (3.60 – 3.64) (EV051).
- 1.15 No authority has offered to accommodate Shropshire’s needs. The various Statements of Common Ground document this process.
- 1.16 It can be concluded that the Council has satisfied the requirement in NPPF Paragraph 141c.

6: Has meeting some of the housing and employment needs of the Black Country led to the need to release or safeguard more land from the Green Belt?

- 1.17 The proposed contributions to the unmet needs of the Black Country are assimilated into Shropshire’s overall requirements – they are not being delivered in a specific geographical area or on specific sites.
- 1.18 The overall requirements are being delivered in accordance with the urban-focussed Development Strategy, which fits well with the contributions to the Black Country given that the Draft Local Plan proposes growth at several settlements in the Green Belt which have strong functional links to it, including at Shifnal where 39ha of Green Belt is being released for employment purposes to deliver economic growth along the “Eastern Belt” Strategic Corridor, thereby being particularly well served to spatially address such needs therefore.
- 1.19 Safeguarded land has been identified to meet longer term needs beyond 2038. The contributions to the Black Country relate to the plan period to 2038, so these contributions have not led to the proposals to safeguard land specifically to address post-2038 Black Country needs, albeit it is possible that further contributions could be required beyond 2038 which the safeguarded land would be well placed to meet.

7: Is the extent of safeguarded land sufficient to meet longer term needs beyond the plan period and are they justified?

- 1.20 116ha of Green Belt is proposed to be released and safeguarded at Albrighton (20ha), Alveley (3.6ha) and Shifnal (93ha) to meet longer term needs. There is no clear Evidence Base to determine exact growth requirements beyond 2038 save to note that it is overwhelmingly likely to occur. Nonetheless, this quantum of safeguarded land is significant and capable of delivering major development to contribute towards longer term requirements, whilst ensuring proportionate and long-term growth of settlements.
- 1.21 By way of example, Miller’s safeguarded land at South West Shifnal is capable of delivering a sustainable community adjacent to a settlement which can accommodate

growth in the order of 1,200 dwellings alongside supporting community facilities (primary school and local centre).

- 1.22 The role of settlements and review of Green Belt boundaries has been determined based upon the Sustainability Appraisal and the proposed Development Strategy, in accordance with NPPF Paragraphs 142 and 143a. The Green Belt review has informed the Council's consideration of longer term needs of settlements beyond the plan period and it has safeguarded land for this purpose which is precisely what NPPF Paragraph 143 requires. This will ensure that Green Belt boundaries endure beyond 2038 (NPPF Paragraph 140).
- 1.23 The safeguarding of South West Shifnal is therefore justified, reflecting an appropriate strategy, taking into account reasonable alternatives and based on proportionate evidence:
- The whole site (SHF034) was assessed in the "Strategic Sites Assessments" of the **Sustainability Appraisal** (Appendix T, SD006.21), achieving an overall sustainability score of -2 and therefore rated "Good" at Stage 2a (for housing); this score was the highest for all strategic sites at Shifnal and of all safeguarded land adjoining the town. Appendix P (SD006.17) includes individual assessments of sub-parcels of the site (SHF019, P15b west, SHF019VAR, SHF017 and P16a) and Stage 3 recommended that the majority of these parcels be removed from the Green Belt and safeguarded.
 - The **Green Belt Review** (EV050) included South West Shifnal within three Parcels and the relative grading of harm is shown visually on Figure A7.18. It is highlighted that "P15 Sub-parcel" represents the lowest level of harm of all Shifnal parcels (moderate) and includes "land between A464 (south) and Park Lane" (Schedule S.15.1iii). P16 was deemed moderate-high; second lowest degree of harm at Shifnal (comprising "Land between Park Lane and A4169 at Lodge Hill" in Schedule S.15.1iii).
 - **The Exceptional Circumstances Statement** (EV051) identifies the exceptional circumstances to release Green Belt at Shifnal. It states "*...removing the proposed land parcels... to the ... south and south-west of Shifnal is consistent with and will directly contribute to the development plan strategy for meeting the preferred distribution of development. This will fulfil the need for sustainable development in Shifnal and will ensure the town fulfils its role and function in the settlement hierarchy*" (Paragraph 8.151) (emphasis added).

A policy mechanism to deliver safeguarded land where necessary

- 1.24 The proposed safeguarding of land to meet longer term needs is welcomed but the Local Plan should also include a policy mechanism (either within SP11 or a new policy) to permit delivery and development of safeguarded land during the plan period in the likely event that problems/shortfalls are encountered with housing delivery following Local Plan adoption.
- 1.25 For example, unexpected circumstances could arise including a shortfall in five year housing land supply throughout the plan period, a failure to meet the Housing Delivery Test and/or a changing housing requirement during the life of the Local Plan, any or all

of which will require additional land to be brought forward to address any shortfalls (e.g. a further revision to the standard method for calculating local housing need or a requirement to contribute further to the unmet needs of the Black Country).

- 1.26 This approach has been adopted elsewhere, for example the West Lancashire Local Plan (2013) which identifies safeguarded sites within settlement boundaries which can be delivered should “Plan B” circumstances be engaged at 5 yearly monitoring intervals or should the housing target increase (to allow flexibility). Copies of the relevant policies (GN2 and RS6) are attached as **Appendix 2**.
- 1.27 The advantage of this approach is that it provides an effective fall-back policy mechanism which can allow safeguarded sites to be delivered swiftly where a proven need arises through monitoring, without the need to update/review the Local Plan which in itself can take several years resulting in further delays to housing delivery.

8: Do the exceptional circumstances, as required by paragraph 136 of the Framework, exist to justify the Local Plan’s proposed removal of land from the Green Belt, including safeguarded land?

- 1.28 Yes – Exceptional circumstances are fully evidenced and justified to alter Green Belt boundaries as proposed in the Draft Local Plan. This is set out in Section 8 of GC4g and in greater detail in the Exceptional Circumstances Statement (EV051).
- 1.29 The principal driver is the urban-focussed Development Strategy which was selected following the Sustainability Appraisal, and which includes proportionate growth at five settlements in the Green Belt (including Shifnal).
- 1.30 Miller’s Reg.19 representations also set out the site-specific exceptional circumstances to justify the release of South West Shifnal from the Green Belt:
- Easing highway capacity issues in the town by incorporating a link road between the A464 (south) and the A4169 and a potential future link from the A4169 up to the A464 (west);
 - Easing traffic congestion on Park Lane by improving access and providing a drop off point for St. Andrew’s Primary School;
 - Improving primary school capacity by providing land for a new school;
 - Assisting in addressing some of the unmet housing needs of the Black Country;
 - Providing new homes for the working age population which will support the economic growth strategies for the town and Eastern Belt Strategic Corridor;
 - Providing a significant number of affordable homes in a town which is suffering from affordability issues; and
 - Creating new households that will generate expenditure and provide much needed investment in the town’s services and facilities.

9: Does the Local Plan seek compensatory improvements to the environmental quality and accessibility of the Green Belt?

- 1.31 Paragraph 3.108 of the Draft Local Plan confirms that specific compensatory improvements are set out in “Development Guidelines” for allocations, and states that such improvements will be encouraged for unallocated proposals and expected when safeguarded land is allocated for development.
- 1.32 The Exceptional Circumstances Statement (EV051) sets out how the land safeguarded at South West Shifnal can provide compensatory improvements including landscape strengthening (hedgerows), new active travel links, open space and biodiversity net gain (Paragraph 8.160). These have been reflected in the emerging masterplan concept for the site which will be shared at Stage 2 of the Examination, and will need to be evidenced at the application stage also.

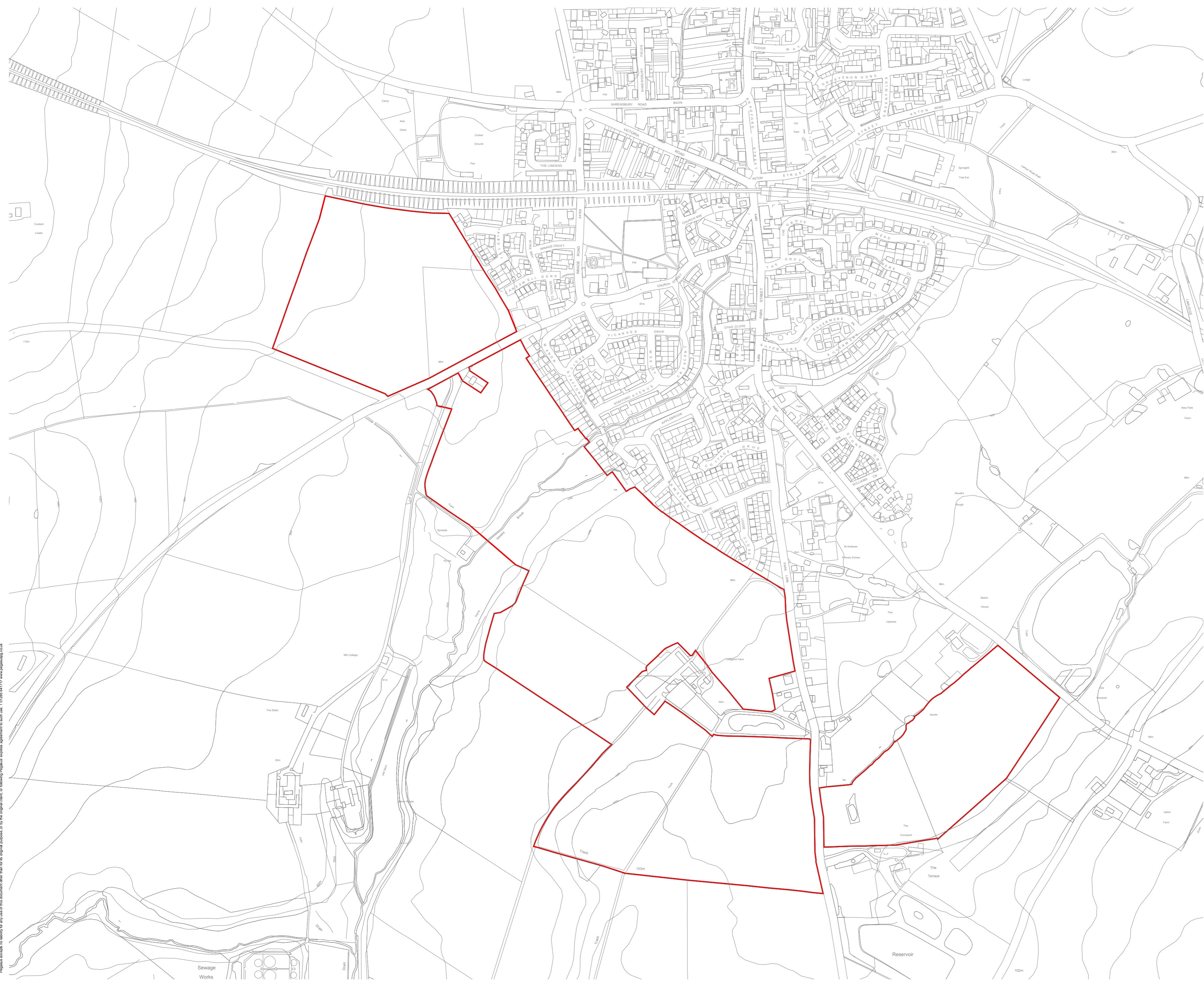
10: Are all the sites proposed for release or safeguarding and their boundaries clearly shown on a map?

- 1.33 The boundaries to the safeguarded land at South West Shifnal are clearly identified on the Draft Shifnal Place Area Inset Map (SD005.15 S15) and have been carefully defined using physical features that are readily recognisable and likely to be permanent. This is set out in the Green Belt Exceptional Circumstances Statement (EV051) which explains that strong and defensible boundaries will take the form of roads, the western railway line, ridgelines and structural planting/landscaping at field boundaries.
- 1.34 Notwithstanding the defined boundaries of safeguarded land, none of the safeguarded land in the Draft Local Plan is explicitly listed in SP11 – there is simply a reference to land being identified on the Policies Map which we consider is imprecise and ambiguous (SP11 is also largely silent on the “development management” approach that will apply to safeguarded land). In addition, none of safeguarded land is afforded a reference number (unlike allocations). This is unclear and should be addressed to avoid ambiguity, especially for the purposes of cross referencing the Policies Map.
- 1.35 By way of example, South West Shifnal comprises three of the named parcels in Schedule S15.1(iii):
- “Land between A464 (south) and Park Lane” (9.6ha);
 - “Land between Park Lane and A4169 at Lodge Hill” (46.1ha); and
 - “Land between A4169 and the western railway line” (12.8ha).
- 1.36 These parcels are not defined on the Shifnal Policies Map Inset (SD005.15 – S15) so it is not possible to distinguish between them. This is unclear and may lead to misinterpretation in future decision-making. Figure 1.1 which can be found at Page 1 of this Hearing Statement illustrates the location of each of these parcels.
- 1.37 We therefore request that:

- Schedule SP15.1iii be elevated into Policy SP11 so that the land is formally designated in policy (rather than a simple reference to the Policies Map);
- The sites listed in Schedule SP15.1iii be given reference numbers; and
- The Policies Map identifies the boundaries of the individual safeguarded sites and their reference numbers to provide a sufficient level of precision.

Appendix 1: Site Location Plan

KEY
Total Site Boundary
64.5 ha / 159.4 acres



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Appendix 2: Policies GN2 and RS6 from West Lancashire Local Plan (2013)

Chapter 5 General Development Policies

5.11 It would be inappropriate to safeguard Protected Land outside settlement boundaries, as this could imply that the land is considered suitable for development at some point in the future, and would effectively give it the same status as other former 'Open Land on the Urban Fringe' now deemed worthy of inclusion within settlements, which would thereby undermine the setting of settlement boundaries.

5.12 Therefore, Policy GN1 is less restrictive than national Green Belt policy in relation to 'Protected Land', but generally seeks to restrict development on former non-Green Belt land outside settlements to small scale and low intensity uses, or to uses which are appropriate in rural areas, for example horticulture. The uses permitted by Policy GN1 for Protected Land are consistent with Policy DS4 of the previous Local Plan (WLRLP 2006), and represent a continuity in approach.

5.13 Outside settlement boundaries, Policy SP1 allows for countryside uses that retain or enhance the rural character of the area and Policy RS1 allows for affordable housing outside settlements only if there are no suitable sites within the settlement. These policies are consistent with what is allowed by Policy GN1 for non-Green Belt land outside settlements.



5.2 Policy GN2: Safeguarded Land

Context

5.14 The Local Plan is required to demonstrate flexibility to respond to changing circumstances. In addition, when amending Green Belt boundaries, the National Planning Policy Framework directs Local Plans to have "regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period" (paragraph 83, p20). Therefore, there is a need to remove some land from the Green Belt and safeguard it for a "Plan B" (to allow flexibility within the Local Plan) and for development needs beyond the plan period (beyond 2027).

Policy GN2

Safeguarded Land

The land identified on the Policies Map as safeguarded land is within the settlement boundaries but will be protected from development and planning permission will be refused for development proposals which would prejudice the development of this land in the future. This safeguarding is necessary for one of the following two reasons:

- It is allocated for the “Plan B” – such land will be safeguarded from development for the needs of the “Plan B” should it be required. If the “Plan B” is not required then this land will be safeguarded from development until 2027 for development needs beyond 2027.
- It is safeguarded from development for needs beyond 2027 – these sites will only be considered for development after 2027 if there is not a sufficient supply of other suitable sites within the settlement boundaries to meet any identified development needs at that time.

The following sites will be safeguarded from development (potential capacity for housing and / or employment land in brackets):

a) “Plan B” sites

- i. Land at Parr’s Lane, Aughton (400 dwellings)
- ii. Land a Ruff Lane, Ormskirk (10 dwellings)
- iii. Land at Red Cat Lane, Burscough (60 dwellings)
- iv. Land a Mill Lane, Up Holland (120 dwellings)
- v. Land at Moss Road (west), Halsall (240 dwellings)

b) Safeguarded until 2027

- i. Land at Yew Tree Farm, Burscough (500 dwellings and 10 ha of employment land)
- ii. Land at Moss Road (east), Halsall (210 dwellings)

The safeguarded land at Yew Tree Farm is not marked on the Policies Map as it is part of the wider Policy SP3 allocation for a strategic development site and a subsequent masterplan for this allocation will define the precise boundary of the land to be safeguarded until 2027 within this site.

Chapter 5 General Development Policies

Justification

5.15 Ultimately, given the requirement to amend Green Belt boundaries in the Borough to ensure the delivery of the residential and employment development needs and the requirement to demonstrate flexibility in that delivery of development needs if circumstances change, it is necessary to identify safeguarded land within the Local Plan. This land will be protected from development until it is absolutely required to meet development needs beyond this plan period or, if it is assigned as a “Plan B” site, to meet development needs in this plan period if allocated sites fail to deliver the required amount of development.

5.16 In considering how much land is to be safeguarded, regard has been had as to how much land is required for the “Plan B” and what would be a reasonable amount to safeguard from development for potential development needs beyond 2027. In considering which sites should be safeguarded, a full site appraisal of a number of potential sites was undertaken. A summary of the site appraisal process that has led to the above list of sites is provided in the separate technical paper on Strategic Options and Green Belt Release. This is especially relevant for those sites safeguarded from development for the “Plan B”.

5.17 The land safeguarded until 2027 has been identified as such because it is part of a wider parcel of land removed from the Green Belt or removed from the policy designation under Policy DS4 in the Replacement Local Plan (2006) but which is not required for development in the Plan period or under the Plan B. An example of this would be Yew Tree Farm in Burscough, where only a portion of the wider Yew Tree Farm allocation is required for the Strategic Development Site (see Policy SP3) but the Green Belt amendments must encompass the entire site to ensure that the new boundary of the Green Belt is robust.

Other Local Planning Policy and supporting documents

- West Lancashire Local Plan 2012-2027 – Technical Paper 1: Strategic Options and Green Belt Release (2012)
- The Green Belt Study (2011)

5.3 Policy GN3: Criteria for Sustainable Development

Context

5.18 The aim of achieving sustainable development is a key objective of the planning process and the Council is committed to ensuring that all development in the Borough is of a high quality which contributes positively to its distinctive character. All development within the Borough, including changes of use, is therefore expected to be sustainable, having full regard to the local context within which it sits.

5.19 Design features can also address wider sustainability issues such as crime, carbon reduction, reducing flood risk and other environmental concerns such as air quality and lighting, creation of wildlife-friendly habitats, and making buildings accessible to all user groups. Therefore, a policy is required to guide development proposals to ensure that they are sustainable.

7.59 Although some temporary accommodation will not require planning permission, in most cases permission will be required. Operators should always check with the Council's Planning Department, but normally planning permission is required in the following cases:

- If the workers will be housed for longer than a normal planting, growing, or picking season;
- If caravans and other related buildings (e.g. canteens and toilets) are to be kept on site permanently;
- If a change of use to an existing building is involved; or
- If hardstandings and permanent services (e.g. water supply or septic tank) need to be constructed.

7.60 The Council wishes to assist in supporting a healthy rural economy within the context of national and local planning policies. Permanent buildings or caravans which are kept on site for a number of months can reduce the open character of the Green Belt and have an adverse impact on the landscape and the amenity of local residents. Therefore, the above policy has been introduced to limit the impact of this type of development on the local area.

7.61 The Council has also produced Supplementary Planning Guidance on Accommodation for Temporary Agricultural Workers, which is relevant to the implementation of this policy.

Other Local Planning Policy and supporting documents

- Accommodation for Temporary Agricultural Workers SPG (2007)

7.6 Policy RS6: A "Plan B" for Housing Delivery in the Local Plan

Context

7.62 Policy GN2 sets out several sites across the Borough that are safeguarded from development for the needs of a "Plan B", should it be required. Appendix E sets out the key issues in relation to delivery and risk for each individual policy. For Policies SP1 and RS1, these delivery issues often revolve around a similar concern – what if a key site or location for residential development cannot be delivered? Ultimately, this leaves the outcome of the locally-determined target for residential development not being met, unless a viable alternative can be found.

7.63 Therefore, while it is hoped that all aspects of the Local Plan will be deliverable, and they have been selected because the Council believes that they are, it is prudent to have a "Plan B" prepared in case a key site(s) for residential development does not come forward for development during the plan period. Policy RS6 provides the Council with the ability to enact such a "Plan B" should it become apparent through monitoring that the Local Plan's residential targets are not being met.

7.64 An additional consideration is the fact that the Local Plan covers a long period (15 years) and, in relation to the locally-determined targets, it is not unreasonable to expect some change in the evidence for those targets over the 15 years, potentially resulting in new targets. Therefore, the Local Plan should be flexible enough to address these changes, as well as any other reasonable change in circumstance, without a wholesale review of the Plan.

Policy RS6

A "Plan B" for Housing Delivery in the Local Plan

The "Plan B" sites safeguarded in Policy GN2 will only be considered for release for housing development if one of the following triggers is met:

- Year 5 review of housing delivery

If less than 80% of the pro rata housing target has been delivered after 5 years of the Plan period, then the Council will release land from that safeguarded from development for "Plan B" to enable development to an equivalent amount to the shortfall in housing delivery.

- Year 10 review of housing delivery

If less than 80% of the pro rata housing target has been delivered after 10 years of the Plan period, then the Council will release land from that safeguarded from development for "Plan B" to enable development to an equivalent amount to the shortfall in housing delivery.

- The housing target increasing as a result of new evidence

If, at any point during the 15 year period of the Plan, the Council chooses to increase its housing target to reflect the emergence of new evidence that updates the existing evidence behind the housing target and which would undermine the existing target, then an appropriate amount of land will be released from that safeguarded from development for "Plan B" to make up the extra land supply required to meet the new housing target for the remainder of the Plan period.

Justification

7.65 The Council believe that the locally-determined targets that have been set in this Local Plan are fair and reasonable in light of all the available evidence at this time. However, it is possible that targets for residential development will rise, meaning that new locations for development would need to be identified, and so in this situation the "Plan B" would also provide the flexibility required to accommodate this rise.

7.66 In essence, the Council's "Plan B" for the Local Plan involves the release of land from the Green Belt and its allocation as safeguarded land under Policy GN2. This land would be safeguarded from development until the above triggers in Policy RS6 are reached. Until these triggers are reached the land will be protected from development in a similar way to Green Belt (see Policy GN2) and in such a way as to not prejudice the possible future development of this land if the "Plan B" is triggered.

7.67 The supply of land safeguarded from development for the “Plan B” in Policy GN2 (which has a total capacity of 830 dwellings) is more than sufficient to allow for at least 15% extra on top of the 15-year housing target being proposed in the Local Plan (15% of 4,860 dwellings = 729 dwellings). This percentage is based on the need to ensure that even the largest of the housing allocations in the Local Plan is covered by the flexibility of the “Plan B”, should it fail to be delivered.

7.68 Ongoing monitoring of housing delivery in the Plan period will enable the Council to be prepared for any trigger points in Policy RS6 being reached. If it is anticipated a year before any trigger point is reached (i.e. at the end of Years 4 and 9 of the Plan) that housing delivery is at risk of triggering the “Plan B”, the Council will commence a review of the level and nature of any undersupply compared to housing requirements. This review will also review the “Plan B” sites themselves in order to identify which site(s) are most suitable to release for development at that time (if any, depending on the nature of, and reasons for, the undersupply), should the level of undersupply ultimately trigger the “Plan B” in April of the following year. The quantum of release will be sufficient to meet the identified shortfall in housing delivery compared to the housing requirements.