

(Closing Statement by Heidi Salter for the Wilderness Lane/Peak House community):

- Notwithstanding that the Council's eco specialist had not inspected the site, and disappointingly was not sufficiently knowledgeable on the history and topic of biodiversity in relation to the green belt fields in question – we don't feel that this changes the facts as they are:
- Such as: the Bat Report; the Landscape Report by Michelle Bolger; or the facts contained in the Black Country 2019 Report (including stating the site to be a SINC). All these Reports, are by specialists in their field, and detail the various important components essential to this stretch of Green Belt. They provide compelling evidence against the development of this site. They serve to highlight the harm any development (whether countryside park or houses) will inflict on the green belt.
- In accordance with the terms of the **National Planning Policy Framework (NPPF)** - any development of natural green belt must be considered inappropriate – and thereby harmful to greenbelt. In fact in the case of **Timmins v Gedling Borough Council (2014)**: The High Court held that inappropriate development in the green belt should not be approved unless very special circumstances clearly outweigh the potential harm. The case underlines the necessity for robust justification for any green belt development, setting a **high threshold for "very special circumstances."**

We have not seen any convincing or substantive evidence to indicate any "very special circumstances" here.

- By persistently attempting to foist a Countryside Park on a community, and local Council who are all so strongly objecting to it - in order to obtain permission to develop on green belt land – we feel is not only a manipulation and corruption of the true intention of the NPPF, but would cause irreparable harm to this green belt.
- The developers would have us believe the purpose of Green Belt is for human enjoyment (by way of a countryside park). It's not. It serves to support the natural balance of wildlife, biodiversity, air quality and prevent coalescence. Furthermore, all of these benefits would be adversely affected by the intervention of humans. Nature has thrived for centuries in these enclosed fields - and the community (near and far) have enjoyed a wonderful open visual amenity, abundant wildlife (including bats, newts, owls, foxes, deer, hedgehogs, toads) and cleaner air as a result!
- We urge that the public's voice is heard on this matter. Our highest motivation is **not for profit**, but is the protection of our local green belt - and by extension air quality, the rich biodiverse fauna and flora, supporting ancient hedgerow, visual amenity, open spaces and green barrier between neighbouring towns.
- Having diligently heard the case presented by the developer during these proceedings and all the evidence - we remain convinced (more so than ever) that this development constitutes an "inappropriate development" (in accordance with NPPF) and would in fact be **"harmful"** to the green belt. It is of absolutely no benefit to the community, or green belt (including its benefits and attributes).

We would like to thank the Inspectorate for their time.