

**Respondent ID:**

**Black Box Planning on behalf of:**

- **The Twigworth Farm Partnership (TWIG014 - Chestnut Tree Farm, Twigworth)**
- **Edward Ware Homes (ALD010 - last west of Willow Bank Road, Alderton)**
- **Redrow Homes (ASHC022 - land at Walton Cardiff, Tewkesbury)**
- **Edenstone Homes (Elms Farm, Minsterworth, plan at Appendix 1)**

Note: Omission site reference numbers in accordance with EB015c

## **Hearing Statement**

### **Matter 3A: Allocations Outside the Green Belt**

1. This statement has been submitted to supplement representations made by Black Box Planning to the Regulation 18 and Regulation 19 consultation stages of the local plan preparation. It does not restate the matters which have already been presented in those representations but does amplify some of the issues with specific reference to the Inspector's List of Matters, Issues and Questions (16 December 2020). This statement also has regard to the Inspector's guidance note regarding the scope and purpose of the TLP examination.
2. In respect of question 3.2 it is prudent to note that the Alderton NDP (adopted July 2018) does not include any allocations for development. Similarly, the TBP does not proposed any allocations at Alderton despite its role as a Service Village.
3. Similarly, also, the Twigworth NDP (adopted May 2019) does not include any allocations for housing growth. However, Paragraphs 47, 48 and 49 set out the methodology for the NDP in respect of defining the settlement boundary and how it seeks to influence future growth as follows.

*47. Rather than define a settlement boundary to contain all new development, this NDP defines a settlement boundary around the area of highest density, near the village shop and away from areas recognised as at risk of flooding or exceeding field capacity. This is intended to focus the assessment of future growth proposals to this area of Twigworth. Whilst some development can be accommodated within it, it is likely that some growth will be required alongside these boundaries.*

*48. The Twigworth settlement boundary is shown on the plan M3 and important public views in M4.*

*49. Such an approach, when considered alongside the criteria detailed in policy H2, will ensure that growth is directed to the best locations and is of a type that is appropriate for Twigworth and in line with the vision and objectives of this NDP. **The approach also allows for the NDP (and development management decision making) to flex and adjust to meet differing growth levels that may be determined through the Statutory Development Plan processes and the outcome of any planning application/appeal.***

4. It is clear therefore that the Twigworth NDP enables the TBP to make allocations in the village should that be considered appropriate.
5. It is recognised however that the NDP also seeks modest scale developments to be delivered over the plan period rather than a single large site delivered in a short space of time. Such objectives could be addressed with appropriate phasing policy for an allocation in the TBP, or by way of phasing conditions through the development control process.