

Respondent ID:

- 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 3C: Allocations and Settlement Boundaries in 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 response to question 3.11, no exceptional circumstances have been established for allocations at Shurdington within the Green Belt. To the contrary, the TBP has to satisfy the requirements for Green Belt release as set out in national policy, including paragraph 137 of the Framework which states:-

“Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development.”

3. The TBP fails to recognise the change to Green Belt policy introduced by NPPF 2019, compared to NPPF March 2012 against which the JCS was prepared. Before assessing the contribution of sites to the Green Belt function, the first port of call is to test for alternatives. It follows therefore, that only if there is no reasonable alternative that the local planning authority should consider releasing green belt land for development.
4. There is clear evidence before the local plan Inspector to demonstrate that there are reasonable alternatives for meeting the identified need of the TBP outside of the Greenbelt. Although the HBP provides no assessment of alternatives, it does at least

acknowledge¹ that non-Green Belt alternatives are available to meet the identified need.

5. By virtue of the proposed allocations at Shurdington, the TBP is unsound as it fails to comply with national planning policy.

6. This issue is addressed in detail in our Matter 3 hearing statement, and also in our Matter 2 hearing statement when addressing question 2.5 in relation to the methodology for identifying housing sites in the TBP.

¹ See paragraph 12.5 of EB013 – Housing Background Paper (October 2019)

