

Mr M Middleton - Planning Inspector

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Document EX160 Green Gap Assessment Final Draft Report August 2019 with specific regard to the area between Welham Green and Brookmans Park.

Comments by Water End Residents Group

Dear Mr Middleton,

We welcome and agree with the findings contained in the summary and recommendations for the area between Welham Green and Brookmans Park (pages 35-39) that the gap is currently robust, and that a gap policy should be identified in this area. The proposed gap policy area is illustrated in Map 2 (page 39) and contains the currently allocated site HS22 (BrP4).

However, we are concerned to note that para 4.6 states that the study forms the basis of a future Supplementary Planning Document (SPD), and that the SPD could be produced once the allocated sites have been finalised, so that the final 'gap policy areas' **can be drawn to exclude the final Local Plan allocations.**

We do not consider that the study of the area between Welham Green and Brookmans Park is definitive or robust enough to achieve the stated project aim in para 1.2 of informing site allocations that minimise impacts on settlement separation, particularly with regard to allocated site HS22 for the following reasons:

It is important to note that there is a distinct difference between the smaller physical gap, with no inter-visibility, on the east side of the East Coast Main Line (ECML) and the larger visual gap on the west side of the ECML, which if site HS22 was developed, would create inter-visibility where there is currently none.

We note that para 4.7 lists the key principals that apply to all gaps, and includes the following:

- Retain the rural character of any remaining gaps between settlements so that there is an experience of travelling through rural countryside after leaving one settlement and before entering the next.
- Avoid developing on visually prominent slopes where possible, and minimise inter-visibility between settlements, particularly where they are not already inter-visible.

In addition, the methodology for the analysis of pressure on the gap contained in para 2.17 states *'This section considered what pressures are on the land between the two settlements through review of draft allocations and sites that have been promoted through the Council's 2019 Call for Sites. This included a brief comment on what the implication for the integrity and strength of the relevant gap, or separation of the two settlements, would be if the draft allocations and promoted sites were to be released for development.'*

Appendix 2 Para A2.12 states that *'Local Plan policy could be expressed in terms of preventing development that would harm the physical or perceived separation between the settlements. This should be judged with reference to the likely effects of development on the features within these gaps that maintain settlement separation.'*

Therefore, we are astonished to note that the two key principals of visual or perceived separation between settlements and inter-visibility between settlements do not feature at all in the following:

- Pressure on the Gap and Potential impact of promoted sites on the Gap (page 37).
- Table 4-1: Summary of gaps recommended to be taken forward as a Gap Policy Areas (Page 118)
- Table 4-3: Summary of potential effect of proposed/potential site allocations on settlement separation (Page 125).

Visual or Perceived Gap

The perceived gap seen by the users of Station Road, which connects the two settlements, is not the physical gap on the east side of the ECML, but is instead on the west side of the ECML.

Currently, if travelling in a northerly direction, the perceived gap is immediately apparent when exiting Brookmans Park over the railway bridge.

If site HS22 remains an allocated site and is ultimately developed, it will reduce the current perception of the gap by approximately 20%. This is particularly significant bearing in mind the size of the existing gap.

Inter-visibility

There is currently no inter-visibility between the settlements of Welham Green and Brookmans Park. The photograph below is taken from the northern boundary of site HS22, and graphically illustrates that Welham Green is clearly visible from that location.



View from Bradmore Lane, looking north. On the extreme right is the car park to the medical centre which is approximately half way between Site HS22 and Welham Green. Welham Green is clearly visible to the left and centre.

Clearly, allocation of site HS22 is contrary to the key principal of minimising inter-visibility between settlements, particularly where they are not already inter-visible.

Site HS22 is the only promoted Brookmans Park site that would create inter-visibility where there is currently none.

Conclusion

We note that the Summary and Recommendation on page 38 for the inclusion of Site HS22 within a gap policy area as defined in Map 2 (page 39) is justified for various reasons, including:

- Ensure that there is an experience of travelling through rural countryside after leaving one settlement and before entering the next, when travelling along Station Road or on the railway.
- Ensure there is no inter-visibility between one settlement edge and the other (making sure to consider the winter situation without leaves on trees).

However, we do not consider that sufficient weight has been given within the study to the issues of perceived separation or inter-visibility to enable informed site allocation when related to the potential release of site HS22 for development.

Site HS22 has already been assessed by LUC in the Green Belt Study Stage 3 (March 2019) as causing High Harm to the purposes of the Green Belt, and further assessed in the Landscape Sensitivity Assessment (July 2019) as causing Moderate High Harm to the landscape if developed.

There are other promoted sites that have:

- a) A lower Green Belt harm rating
- b) A lower landscape sensitivity rating
- c) Do not create inter-visibility where there is currently none
- d) Do not significantly narrow the perceived gap

Site HS22 should be removed from the Plan as a main modification, and be included within the gap policy area as recommended by LUC in the Green Gap Assessment

Peter Miller

Water End Residents Group

October 2019