Representor: A&D Architecture Ltd (31)

Response to Inspectors’ Matters, Issues and Questions

Matter Two: Securing a sustainable Pattern of Development

Response to Questions 2.2, 2.4 2.9, 2.10

Please refer to written submission to 2019 six-week consultation including map attached.

Strategic Gaps are important but should be no greater in extent than they need be to achieve their purpose. Excess size undermines sustainable patterns of development. It also undermines the defensibility of strategic gaps. The over-large extent of the Ringwood and Hollingwood Strategic SG2 is not justified and demonstrably inhibits a sustainable pattern of housing growth in the Borough.

The Transport Studies are up-to-date; no significant change has been made to the development patterns of the Borough since adoption of the Core Strategy to cast doubt on their relevance. For example, the Royal Hospital at Calow remains the largest and most secure employer in the Borough. The Transport studies find that the optimal housing growth site in the Borough – by far – is Brimington South. This fact casts significant doubt on the wisdom of the decision to expand SG2 to the very boundaries of existing built up areas. A very strong landscape argument indeed would be necessary to justify abandonment of such a significant opportunity to promote sustainable patterns of growth and that argument is in our opinion missing.

Solution: SG2 should be reduced in size. It should include that land that can be easily seen from ordinary pedestrian vantage points on the A619 (which is the main public thoroughfare in the east of the Borough) and that land that is currently occupied by trees and lakes that present a permanent physical separation between Middlecroft, Inkersall Green and Brimington Common. The gap should not include any of the farmland on Brimington Common because this can only be seen in distant views from the settlements of Middlecroft and Inkersall Green – if at all – and are screened by rising ground from vantage points on the A619. This farmland can only be appreciated from private vantage points and from a number of narrow footpaths that cross it. Sustainable, master-planned development on this farmland would easily conserve local amenity and these footpaths.

Response to Question 2.11

Please refer to written submission to 2019 six-week consultation including map attached.

Document EV17 does not in our opinion provide a robust and consistent basis/methodology for the determination of strategic gaps. Transparency and objectivity are in our opinion conspicuously missing.

In our opinion, the criteria and the relevant tests are inappropriately obscure and subjective and the conclusions in regard to SG2 are non sequiturs.

In our opinion, nothing in this methodology appears to be transparently testable.
More measurable and testable criteria should be applied to strategic gap assessment such as:

1) Are neighbouring settlements inter-visible from ordinary public vantage points?

2) Do trees or landform exist between neighbouring settlements that would obscure development in one from the other?

3) How vulnerable is land to change? For example, a deep lake is less likely to be built on than a farmer’s field.

4) Are settlements separated by countryside or are they not?

5) How wide is the gap? (If it is very narrow perhaps parts of it should be designated as Local Green Space and given protection as strong as the Green Belt).

Regarding SG2 and attempting to apply the criteria tests in the report it can be seen that the farmland shown hatched orange on the attached plan needs not to be sterilised against development for Brimington Common to remain physically and visibly separate from Hollingwood and Inkersall Green without any possible perception of the settlements having merged. An observer moving from Brimington Common to Hollingwood or Inkersall Green or vice versa would pass through an extensive tract of countryside and access all its “wider perceptual benefits” even if the whole of the farmland were to be developed. The western boundary of the farmland is weak – comprising back gardens which are considered a weak urban edge in the Council’s design SPD- and development of the farmland would strengthen it whilst protecting every lane and footpath crossing it and making them all safer to use. Development of the farmland would be consistent with the Borough strategy of concentration and regeneration and would place new residents within easy walking distance not only of the centre of Brimington but also the largest employment site in the Borough.

Despite all these facts the report finds that SG2 should be expanded to the very fences of the ribbon development that links Brimington Common and Calow. In our opinion, the methodology is mysterious and the findings inconsistent.

**EV17 is not in our opinion fit for purpose and should be removed from the evidence base.**