



# **North Somerset Council Site Allocations Plan Background document**

## **Strategic Gaps**



**March 2016**

## **Evidence Paper on Strategic Gaps**

1.0 Strategic gaps are identified areas of land between settlements which are proposed for specific policy protection from development.

2.0 Relevant plans and policies

2.1 The relevant Core Strategy policy is CS19 set out below:

### **CS19: Strategic gaps**

**The council will protect strategic gaps to help retain the separate identity, character and/or landscape setting of settlements and distinct parts of settlements.**

Policy CS19 has been remitted to the Planning Inspectorate for re-examination, for which the timetable is awaited. However the council is not proposing to change the policy at this stage. For the purposes of this evidence paper one can assume that policy CS19 is adopted in its current format.

The supporting text to policy CS19 in the Core Strategy identified seven locations “as appropriate for investigation for possible designation as strategic gaps” as follows:

- between Weston super Mare and Hutton
- between Weston super Mare and Locking
- between Weston super Mare and Uphill
- between Weston super Mare and St Georges
- between Locking and Hutton
- between Congresbury and Yatton
- between Nailsea and Backwell

The supporting text indicates that strategic gaps will be identified, with boundaries defined in detail, and a policy to guide assessment of development proposals affecting strategic gaps, in the Sites and Policies Development Plan Document.

The Sites and Policies Plan Consultation Draft of February 2013 duly proposed boundaries for strategic gaps between the following places:

- Weston-super-Mare, Hutton, Locking and Parklands Village
- Weston-super-Mare and Uphill
- Weston-super-Mare and St Georges
- Congresbury and Yatton
- Nailsea and Backwell

The Plan included a detailed policy, DM48 to guide assessment of proposals affecting strategic gaps.

2.2 Following public consultation on that plan, it was not considered that change to the policy was needed, and the Site Allocations Plan Consultation Draft (February 2016) includes the same policy, renumbered as SA9, which reads as follows

### **Policy SA9: Strategic gaps**

**Development within strategic gaps as shown on the Proposals Map will be permitted where:**

- the open or undeveloped character of the gap would not be significantly adversely affected;
- the separate identity and character of the settlements would not be harmed; and
- the landscape setting of the settlements would not be harmed.

**The likely impact of the proposal in conjunction with any other developments with extant planning consent will be taken into account.**

2.5 Similarly, it was considered that very few, and only very minor, changes to the strategic gap boundaries that were proposed in 2013 were appropriate, so the proposed strategic gaps in the Site Allocations Allocations Plan February 2016 are very similar. They can be seen on the maps below.

3.0 Purposes of strategic gaps

3.1 The purposes of strategic gaps are reflected in policy CS19 above, and further detail is provided by policy SA9. Strategic gaps are needed to help to protect the separate identity, character and landscape setting of settlements, and in the case of one proposed strategic gap, (between Weston-super-Mare and St Georges) distinct parts of a settlement.

3.2 Strategic gaps have broadly similar purposes to some of the purposes of Green Belt, but operate on a more localised, focussed scale. For example strategic gaps would help prevent the merging of settlements, assist in safeguarding the countryside from “encroachment” so far as land between the settlements is concerned, and help to protect the setting and character of settlements (though this would involve villages as well as towns).

3.4 This means that it is inappropriate for strategic gaps to overlap with the Green Belt, and this has influenced definition of strategic gap boundaries in some cases, notably near Yatton and Nailsea and Backwell.

4.0 Justification for strategic gaps

4.1 Strategic gaps are needed because reliance on countryside policies alone, without the added protection of strategic gaps, would be unlikely to provide sufficient protection against development which would harm the separate identity, character and/or landscape setting of settlements or distinct parts of settlements.

4.2 While existing policies in the adopted North Somerset Replacement Local Plan (RLP) and Core Strategy, and emerging policies in the Sites and Policies Plan Part 1 Development Management Policies (SAPP) provide some control of development in the countryside, (outside the limits of defined settlements, like towns, service villages and infill villages), they do allow for exceptions. Examples include the following developments in the countryside. The relevant policies are given in brackets:

- new buildings for business uses B1, B2 and B8 (SAPP policy DM53);
- ancillary buildings and intensification of use for existing businesses (SAPP policy DM55);

- new buildings for visitor accommodation (SAPP policy DM57);
- tourist facilities such as attractions (RLP policy E/9)
- camping and caravan sites (SAPP policy DM58);
- garden centres (SAPP policy DM59);
- sporting, cultural or community facilities, embracing a range of developments including for example, museums, schools, sports facilities, places of worship, health facilities, community halls, pubs, (and more), (SAPP policy DM69);
- new buildings for agriculture and land based rural businesses like farm shops (SAPP policy DM51);
- equestrian development (SAPP policy DM52);
- rural workers' dwellings (SAPP policy DM46);
- sites for gypsies, travellers and travelling show people (Core Strategy policy CS17);
- rural affordable housing exceptions schemes (Core Strategy policy CA17);
- some policies permit development of previously developed land in the countryside, which could include land which is no longer occupied by a permanent structure so is open, or the curtilage of developed land which might be largely open. Such developments include new residential care or nursing homes, (SAPP policy DM41), and non-residual waste treatment facilities (policy 2 of West of England Joint Waste Core Strategy);
- examples of other types of development which could occur in the countryside include transport cafes, restaurants and petrol stations.

4.3 This shows that, even with existing policies, there is a large range of types of development which could occur in the countryside, so there is a significant risk that, without the added protection of strategic gaps, the separate identity and character of the settlements, and/or their landscape setting would be significantly adversely affected. There would particularly be a risk of gradual incremental development, and where the gap is narrow there would be a potential risk of coalescence of the settlements.

4.4 Strategic gaps have other potential benefits, particularly relevant to protecting and enhancing the natural environment, as follows:

- wildlife corridors
- within strategic gaps any wildlife habitats, landscape features and heritage assets, including archaeological remains, are less likely to be affected by development
- potential areas for sustainable drainage and where appropriate, flood attenuation
- strategic gaps can provide “green lungs”, supporting trees and other vegetation which absorb CO<sub>2</sub> so helping to mitigate climate change
- potential to locate land-hungry recreational uses like playing fields or allotments, close to their users
- attractive, green areas which break up the urban fabric and are important for health and amenity. These benefits will be particularly perceived where gaps include or adjoin existing or potential routes for cyclists and walkers.
- helping to maintain attractive gateways to settlements.

4.5 Protection of strategic gaps is consistent with visions for the area set out in the Core Strategy, notably visions (1) for North Somerset, (6) for Service Villages and (7) for Infill Villages and Countryside which refer, respectively to:

- protection of the character of villages and the open countryside from intrusive development;

- protection of the individual character of Service Villages;
  - retention and enhancement of the countryside character of rural areas, maintenance and enhancement of the individual character, identity and sense of community of Infill Villages, and retention of the open natural character of the surrounding countryside, with protection of its distinctive landscapes from inappropriate development.
- 4.6 Protection of strategic gaps is consistent with the priority objectives of the Core Strategy, particularly the 7<sup>th</sup> one, which states that “valued strategic gaps between settlements and characteristic green spaces and areas will be protected and enhanced”.
- 4.7 Protection of strategic gaps is consistent with the NPPF paragraph 17 which promotes recognition of the intrinsic character and beauty of the countryside, and recognition that some open land can perform many functions (such as for wildlife, recreation, flood risk mitigation, carbon storage, or food production).
- 4.8 Paragraph 61 of the NPPF states that planning policies and decisions should address the connections between people and places. Strategic gaps help to achieve this, by helping to maintain the separate identity of settlements, and conveying a sense of leaving one settlement or place and entering another.
- 5.0 What development would be controlled by the strategic gap policies?
- 5.1 Strategic gaps are not intended to stop all development and will inevitably include some development already. There may be opportunities, through appropriate location, siting and design, to accommodate some new development in a strategic gap without significantly adversely affecting the open or undeveloped character of the gap, or harming the separate identity and character of the settlements, or their landscape setting. For example, it might be possible to achieve this by locating some limited development within an existing complex of buildings, such as a farm yard, maximising re-use of existing buildings, redeveloping existing buildings where appropriate, and minimising new building, and using a very high standard of design, sensitivity and landscaping as appropriate. However this will need to be satisfactorily demonstrated.
- 6.0 Criteria to aid definition
- 6.1 The strategic gaps have been defined with regard to the following broad criteria:
- No overlap to occur between Green Belt and strategic gaps.
  - Strategic gaps should be between settlements with defined settlement limits such as towns, Service Villages and Infill Villages, as identified in the Core Strategy.
  - Account will be taken of sense of place, perception of the separate identity of settlements or parts of a settlement, sense of leaving or arriving at a settlement, and the landscape setting of the settlements or parts of a settlement. Relevant factors to be considered include the actual and perceived proximity of the settlements, and views, particularly from land which is accessible to the public, including footpaths and public rights of way, within or adjoining the gap.

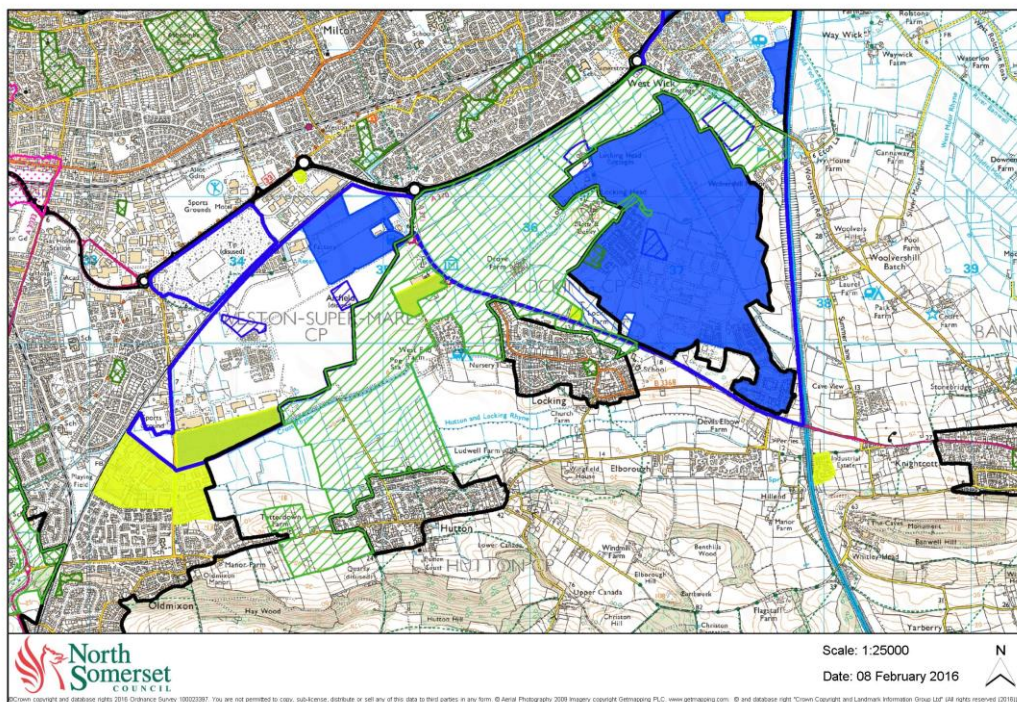


- So far as possible the boundaries will follow identifiable features like hedgerows, and where appropriate, settlement boundaries.

Detailed description of/justification for the defined proposed strategic gaps in the Site Allocations Plan Consultation Draft of February 2016

7.0 Strategic gap between Weston-super-Mare, Hutton, Locking and Parklands Village

- 7.1 This proposed strategic gap is particularly important for maintaining the separate identity of these existing and developing settlements. The proposed gap is shown in green hatching on the plan below (which, like all maps in this document) is an extract from the map showing proposals in the Site Allocations Plan as reported to the council's Executive meeting on 2 February 2016).



- 7.2 The gap is very narrow in places, notably between Locking and the Parklands Village currently being developed, along the A371 corridor, where the gap is little more than 50m wide at its narrowest. This reinforces its importance for preventing the coalescence of these settlements.
- 7.3 Another narrow section, less than 120m wide, is between the proposed northern extent of Parklands Village and Weston- super- Mare at West Wick. The gap is slightly wider to the west, between the A370 near Locking Castle and Locking Head Cottages which broadly mark the proposed north western extent of that part of Parklands Village. The cottages give an indication of the relatively narrow width of the gap here, (about 280m), seen from the A370, in advance of the development of this part of the village. This northern part of the gap mainly includes low lying flat land south of the A370 and Churchland

Way, much of it flood plain. However it also includes the more elevated Motte and Bailey scheduled monument, wooded on its north west side.

- 7.4 The section of the gap between Weston-super-Mare and Hutton, straddling Oldmixon Road, is also relatively narrow (less than 280m wide). There is a wider section (over 600m) between Hutton and the proposed southern extent of Haywood Village currently being developed, part of the Weston urban area, just north of the Cross Rhyne. The sense of this part of the gap can particularly be perceived from Moor Lane that extends northwards from Hutton, crossing a flat relatively open expanse of land which affords views over a wide area.
- 7.5 The south western part of the gap can also be appreciated from the public footpath to the south of Oldmixon Road, which marks the southern boundary of the gap. Photo A1 below was taken from that footpath, looking north from a point near Hutton, showing parts of the proposed strategic gap between Hutton and Weston-super-Mare.

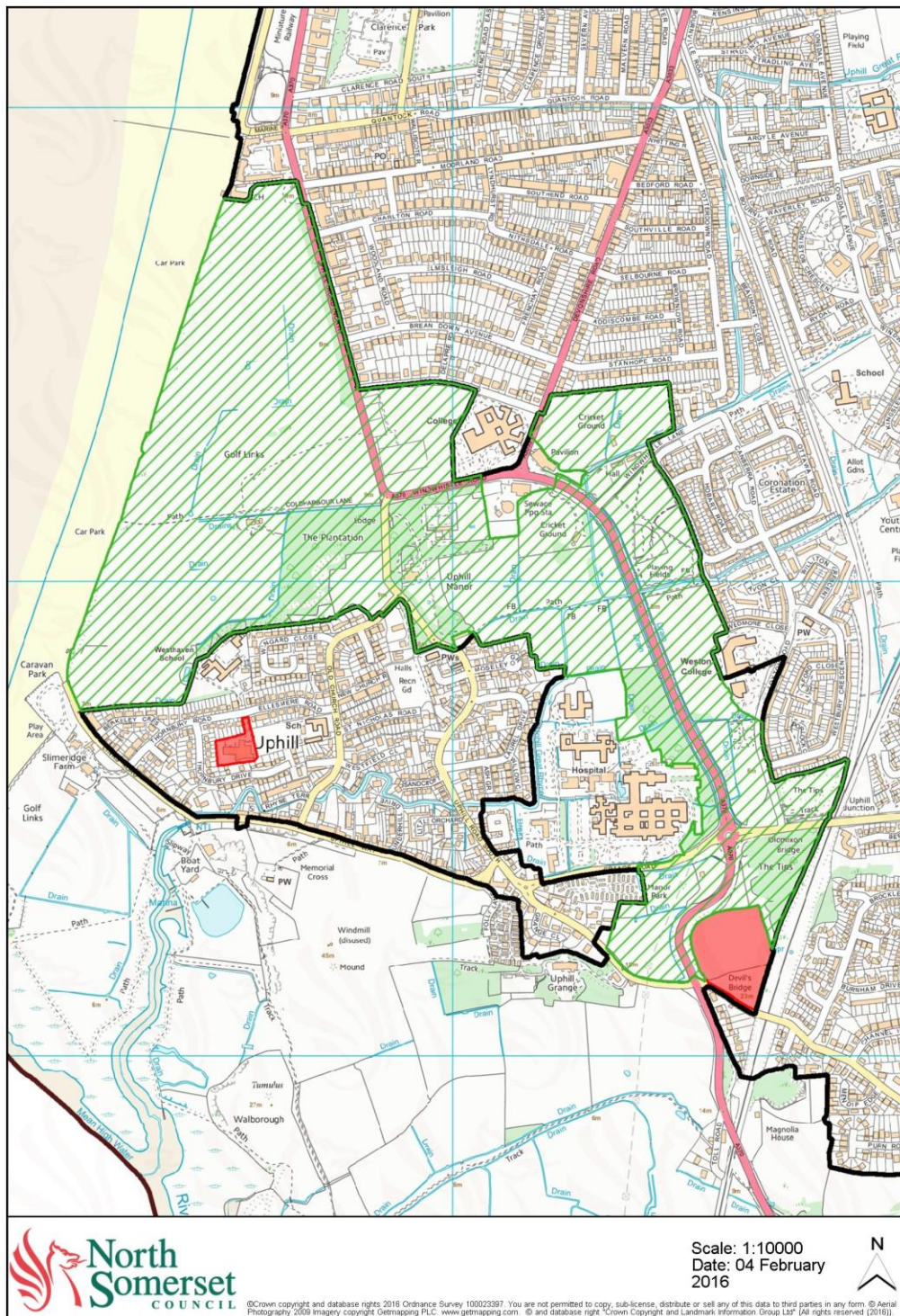
*Photo A1: Looking north across the strategic gap from public footpath near Hutton*



- 8.0 Strategic gap between Weston-super-Mare and Uphill
- 8.1 This proposed strategic gap, shown hatched green on the plan below, straddles the A370 and extends north west to include the golf course north of Uphill, and south as far as Uphill Road South.







- 8.2 The strategic gap is widest at the north west end (about 1km across the golf course), but is mostly under 500m width, and narrows to under 120m near the south end.

- 8.3 The gap is clearly visible from the A370 and notably from the vicinity of the roundabout at the A370/Grange Road/Broadway, from which development at both settlements is visible. Land within the gap can also be seen from roads and public footpaths off the A370, such as Windwhistle Lane, Weston-super-Mare.
- 8.4 The land is largely flat and includes low lying fields and playing fields either side of the A370, and Jubilee Park, Weston-super-Mare. However the section south of the above roundabout includes prominent land rising up above the A370, including well wooded land. This, together with the low lying fields, are very important to the setting of the settlements on this important southern approach road.

*Photo B1: Looking west across part of the strategic gap from A370 towards Uphill*

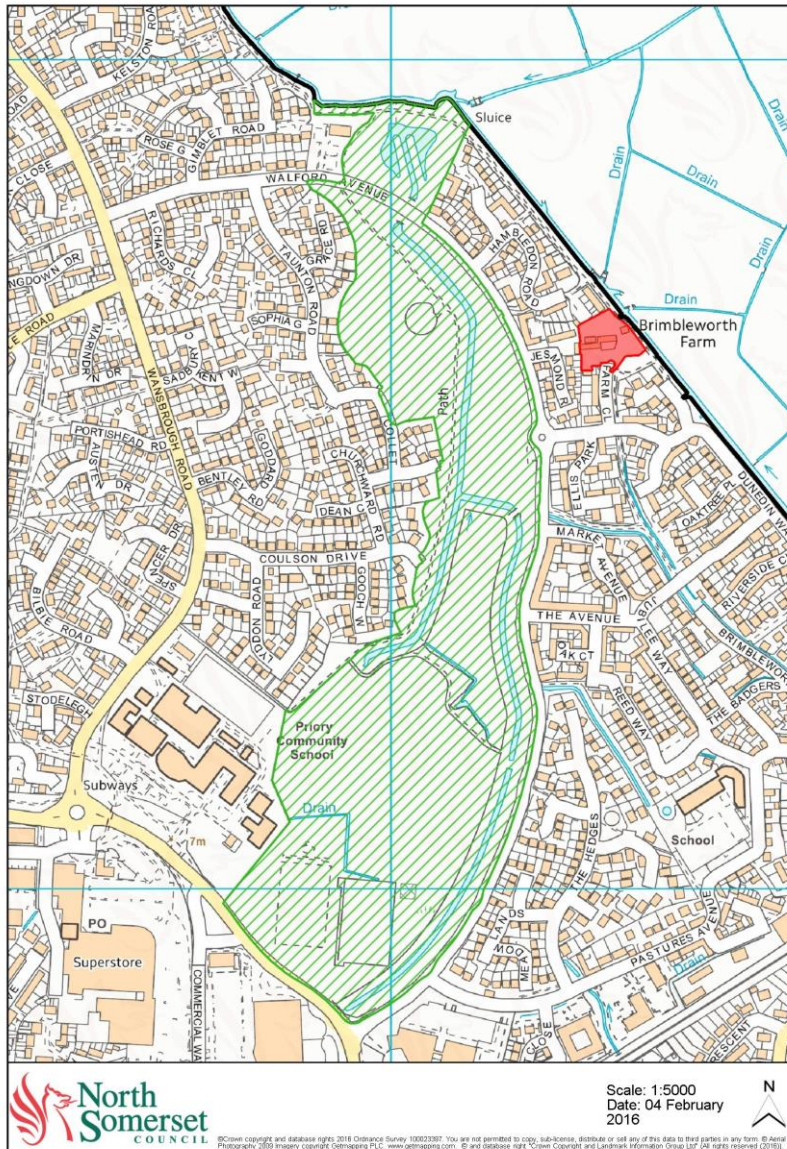


*Photo B2: Looking north north east across part of the strategic gap from A370 towards roundabout and housing at Loxton Road*





- 9.0 Strategic gap between Weston-super-Mare and St Georges
- 9.1 This gap is the only one of those proposed which is between parts of a settlement as opposed to between settlements, (St Georges being a part of Weston-super-Mare, but separated by the gap.) It is shown hatched green on the plan below.



- 9.2 This strategic gap is elongated, about 110m across at its narrowest, near the north end at Walford Avenue, but widening to about 300m at its southern end. It is very important for helping to maintain the separate identity of St Georges from the rest of Weston-super-Mare. It is perceived as an important break between the two parts of the settlement, an attractive “green lung” giving relief to the urban fabric in this area, important for visual amenity and providing recreational opportunities.
- 9.3 The gap is clearly visible from Walford Avenue, (which mainly borders the gap to the east, but crosses it near the north end), and from footpaths across the gap. It includes school playing fields.



*Photo C1: Looking north north west across north part of the strategic gap from near Walford Avenue*



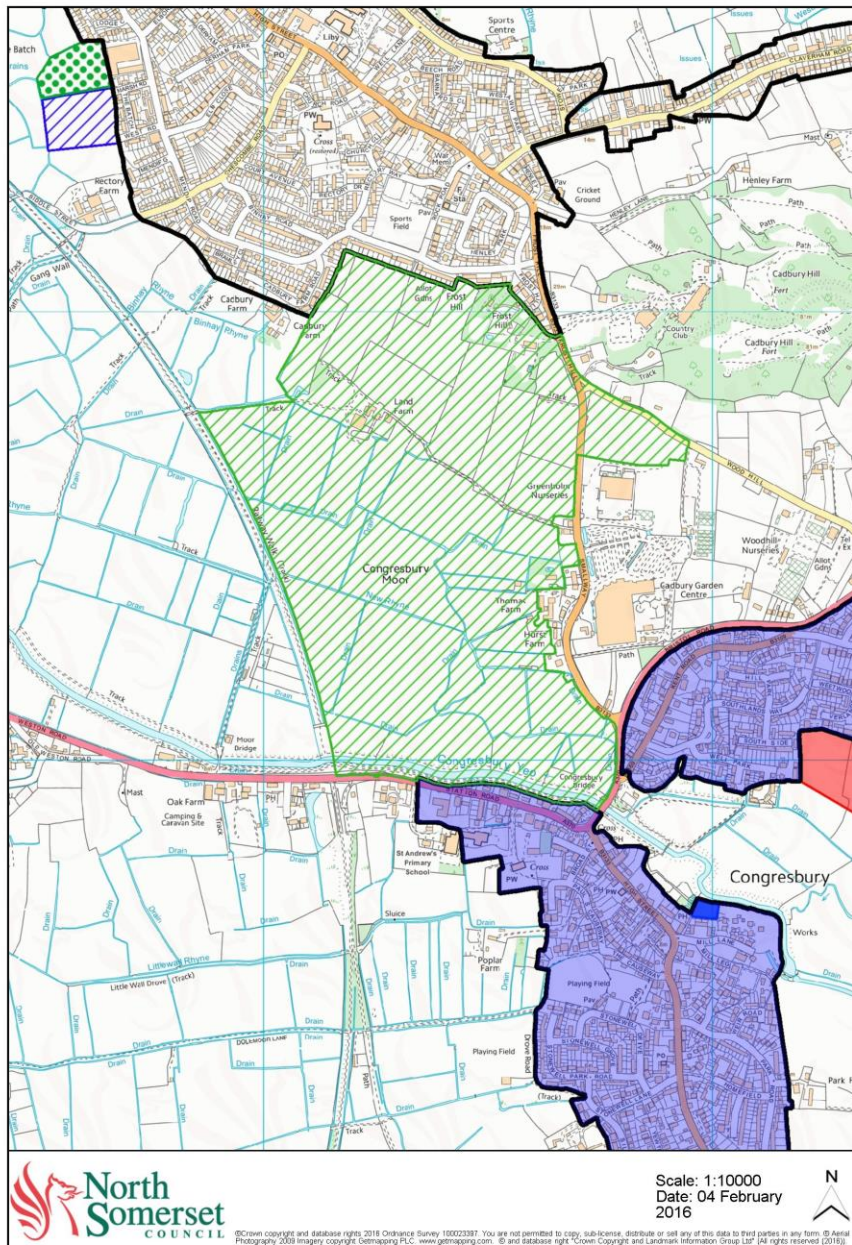
*Photo C2 (below): Another view of the strategic gap from near Walford Avenue*





10.0 Strategic gap between Congresbury and Yatton

10.1 This strategic gap includes, at the south end, the River Yeo (a Wildlife Site) and its flood plain, and extends north across Congresbury Moor, to include a rising back drop towards Yatton, all of which greatly contribute to the setting of the settlements. Part of the gap can be appreciated from the A370 at Congresbury Bridge, including land alongside the river and rising land on the east side of the gap. The gap is shown hatched green on the plan below.



- 10.2 The gap is bounded to the west by the Strawberry Line cycleway/footpath, reinforced by hedgerows. From there the north boundary runs north eastwards to the Yatton settlement boundary near Cadbury Farm (grade 2 listed), and borders housing at Cadbury Farm Road, Mendip Road, and Frost Hill.
- 10.3 South of Yatton, the gap is bounded to the east by the B3133 (Frost Hill) and Wood Hill (beyond which is Green Belt at Cadbury Hill), and further south by Smallway (a continuation of the B3133) and some development on its west side. There is more extensive development on the east side of Smallway, including garden centres/nurseries.
- 10.4 The proposed strategic gap, measured between the settlement limits of Yatton and Congresbury, is over 1km wide, but the sense of the gap in relation to these settlements can still be appreciated, notably from public



footpaths across or adjoining the gap, such as the footpath near Land Farm, and the Strawberry Line.

- 10.5 Due to the development along both sides of Smallway, (particularly the extensive garden centre/nurseries on the east side), the undeveloped areas of pasture land to the north, straddling the north part of Smallway/Frosthill and extending up to Yatton are particularly important parts of the strategic gap. Their loss to development would give the impression of joining Yatton and Congresbury by urban development, even though the settlement limits of Congresbury lie further to the south. The width of the strategic gap between the nurseries and Yatton settlement limits is well under 300m wide. This emphasises the importance of protecting the proposed strategic gap. Also views across the gap seen from the B3133 in this narrow stretch, including the elevated backdrop to Yatton and the view south west across Congresbury Moor, are particularly attractive and show the importance of the strategic gap to the landscape setting of the settlements.

*Photo D1: Looking north north west across the strategic gap from near Congresbury Bridge towards Yatton*





*Photo D2: Looking west north west across the southern part of the strategic gap from near Congresbury Bridge*



*Photo D3: Looking south west across part of the strategic gap from Woodhill*



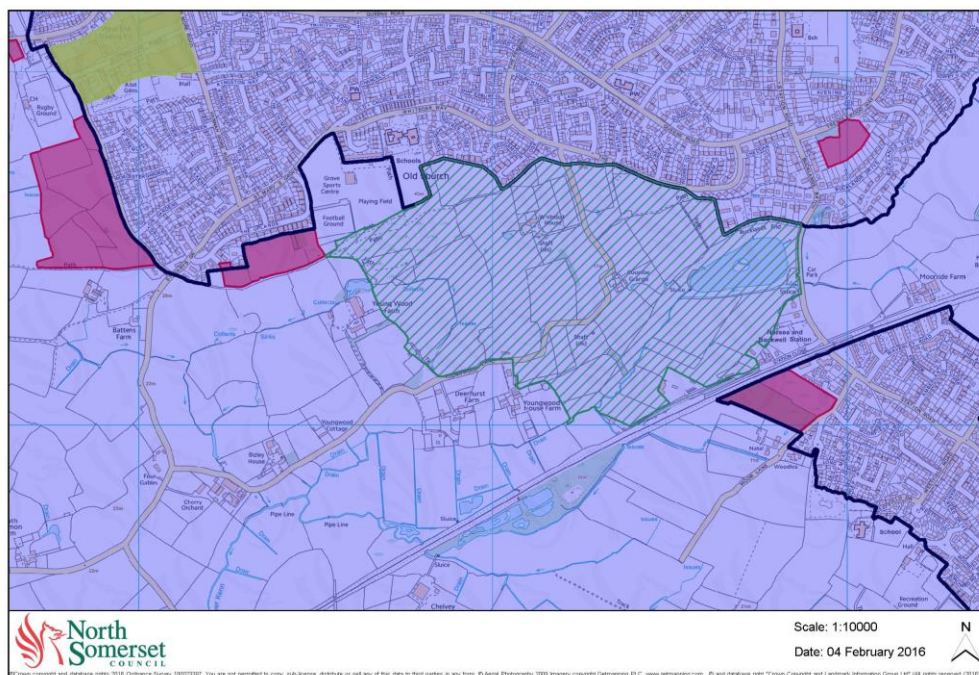
Photo D4: Looking north north west from the B3133 across part of the strategic gap towards Yatton, north of development on the west side of the road



11.0 Strategic Gap between Nailsea and Backwell

11.1 This proposed strategic gap is shown hatched green on the plan below. The gap includes low lying land north of Backwell, which includes a flood plain and Backwell Lake, (a Wildlife Site and Local Nature Reserve). The lake, shown in some of the photos below, is an attractive feature on the east side of the gap.





- 11.2 The narrowest part of the proposed strategic gap is along the eastern boundary, a short section of Station Road, under 200m. The road links the two settlements, and from it, near Bucklands Lane, the proposed strategic gap, including Backwell Lake, is visible, as shown in photo E2 below. This photo conveys the sense of leaving the settlement of Nailsea, to which the proposed strategic gap contributes, reinforced by the fields in the Green Belt immediately to the east. The gap is also visible from some other points on Station Road, notably the entrance to the lake area.
- 11.3 Further north the land rises to the elevated southern edge of Nailsea at The Perrings, with adjoining open space and play area, from which there are very attractive views down across the gap towards Backwell.
- 11.4 There are also very attractive views across the gap towards Backwell from the well-used public footpaths and grass space on elevated ground along a ridge line running near/along the north boundary of the gap. This includes a footpath/bridleway extending eastwards from The Perrings to south of the Grove Sports Centre playing fields and beyond. This path is linked by other public footpaths running roughly north-south across (and also near the west boundary of) the gap, to Youngwood Lane. The sloping topography, clearly visible from these paths and the lane, reinforces the importance of the proposed strategic gap to the landscape setting of the settlements. Development at both Nailsea and Backwell is visible from Youngwood Lane and footpaths in or bordering the gap, reinforcing the sense of the gap.
- 11.5 The sense of the gap can also be perceived looking south from elevated ground at Backwell, such as from the church yard to St Andrew's Church and the nearby public footpaths. The sense of the gap can also be appreciated from the railway station platform, (from where development at Nailsea can be seen across the gap, as shown in photo E4 below, together with development at Backwell) and similarly when travelling by train.

- 11.6 The proposed gap is also important because it would help to prevent development at Nailsea encroaching south over the ridgeline onto the sloping land below, and affecting the landscape setting of the town. Currently, looking north towards Nailsea from Youngwood Lane (see photo E5 below) and towards Nailsea from public footpaths in/adjoining the strategic gap, and looking north from Backwell across the proposed gap towards Nailsea, (and from the railway platform and when travelling by train), relatively little development at Nailsea is visible in the vicinity of the gap. That would not be the case if development were to spill southwards from the existing southern edge of Nailsea onto the land beyond. The strategic gap would help to reduce the likelihood of that occurring.

*Photo E1: Looking south south east across the strategic gap from open space at The Perrings, Nailsea, near the play area, towards Backwell*



*Photo E2: Looking south west towards the strategic gap, including Backwell Lake, from Station Road, leaving Nailsea*



*Photo E3 (below): Looking north across part of strategic gap at Backwell Lake towards Nailsea*





*Photo E4: Looking north from railway station platform across station car park and strategic gap towards Nailsea*



*Photo E5: Looking north across part of the strategic gap from Youngwood Lane towards the ridgeline near the southern edge of Nailsea*

