



Site Allocations Plan  
2006-2026  
(Publication Version)

**Strategic Gaps  
Background Paper**



October 2016

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**Review of Strategic Gaps in North Somerset, to accompany the Site Allocations Plan**  
**Publication Version, October 2016**

**Executive Summary**

- ES1.1 A review of strategic gaps was undertaken in summer 2016. The review occurred because the Council were concerned that they had received responses to the Site Allocations Plan Consultation Draft, March 2016 which criticised the approach that they had used to defining strategic gaps. The Council considered that the Plan would be more robust if the strategic gaps were reviewed using revised criteria. Those criteria were identified having regard to the responses the Council had received.
- ES1.2 The review identified a need to amend (extend) only one strategic gap, between Weston-super-Mare and Hutton. This was taken into account in preparing the Publication version of the Site Allocations Plan, to be published for public consultation in Autumn 2016.

**Detail**

- 1.0 **What are strategic gaps?**
- 1.1 Strategic gaps are identified areas of land between settlements which are proposed for specific policy protection from development, under policy CS19 of the Core Strategy for North Somerset, and policy SA9 of the Site Allocations Plan. The policies read as follows:

**CS19: The Council will protect strategic gaps to help retain the separate identity, character and/or landscape setting of settlements and distinct parts of settlements.**

**SA9: Development within strategic gaps as shown on the Policies 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.**

- 1.2 Policy CS19 was endorsed by the Inspector who oversaw the Examination of consequential changes to the Core Strategy, who concluded that the policy should remain unchanged.
- 1.3 Boundaries for strategic gaps were first proposed in the Sites and Policies Plan Consultation Draft (February 2013), in line with policy CS19 and its supporting text. Then in the Site Allocations Plan Consultation Draft of March 2016 strategic gaps were again proposed, with very little change proposed to the boundaries. A supporting Background Paper on Strategic Gaps was placed on the Council's web site at the time of the March 2016 public consultation on that Plan. This included details of the background to definition of the strategic gaps, the policy context, purpose of and justification for the strategic gaps designation, criteria to aid definition, and detailed descriptions/justifications for the proposed strategic gaps.
- 1.4 Much of that original information on the background, policy context and purpose/justification for the strategic gaps designation is still appropriate, (with some very slight changes). This information has been updated and attached as Appendix 1 to this report. However the original information relating to the detailed justification for the proposed strategic gaps has now been replaced by the updated information in the main body of this document, which documents the review of each strategic gap.

2.0 Why was a review of strategic gaps undertaken?

- 2.1 The review was undertaken because the Council was concerned that it had been criticised over its approach to defining strategic gaps, in responses received to the Site Allocations Plan Consultation Draft, March 2016. Criticisms included a response from Persimmon Homes Severn Valley, who stated that the Council's Background Document on Strategic Gaps is "largely descriptive and each proposed gap is not assessed against a common set of criteria". Gleeson Strategic Land stated that the Council have not followed any recommended methodology in developing the principles of a strategic gap.
- 2.2 We noted that Gleeson Strategic Land referred to a document called "Strategic Gap and Green Wedge Policies in Structure Plans: Main Report", 2001, which was



commissioned by the former Office of the Deputy Prime Minister. It refers to cases where local authorities have promoted policies on strategic gaps in their plans. In paragraph 4.15 it refers to the Inspector at the Inquiry into the Eastleigh Local Plan in 1998 being “unable to define a standard formula for delineating strategic gaps”, but that he considered a number of factors to be most useful, as follows:

- Distance
- Topography
- Landscape character/type
- Vegetation
- Existing uses and density of buildings
- Nature of urban edges
- Inter-visibility (ability to see one edge from another)
- Intra-visibility (ability to see both edges from a single point)
- The sense of leaving a place.

2.3 It was considered appropriate to consider these criteria, and, then, taking account of them and the original criteria used to define the strategic gaps, to identify a revised set of criteria to use in reviewing the strategic gaps.

### 3.0 Identifying the revised criteria to undertake the review of strategic gaps

3.1 The original criteria used by the Council in defining the strategic gaps in the March 2016 SAP is set out in the initial Background Paper on strategic gaps, which was placed on the Council’s web site at that time. The relevant extract is set out below:

#### *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.*

3.2 The Council considered the “Eastleigh Local Plan Inspector’s criteria” as follows:

Distance was considered to relate to actual and perceived proximity of the settlements, an existing criterion. It also relates to risk of coalescence.

Topography was considered to be a factor relevant to landscape setting of the settlements, (an existing criterion).

Topography could also affect the orientation of settlements one to the other, which could affect views and the perception of the gap.

Landscape character/type: This was considered to relate to landscape setting of settlements, an existing criterion.

Vegetation: It was considered that this could affect the landscape setting of settlements, an existing criterion.

Existing uses and density of building: This was considered to be a relevant consideration.

Nature of settlement edges: it was considered that this could be relevant to other criteria, and commented on under them. For example where settlement edges are softened or screened by vegetation they could be mentioned under landscape setting; etc.

Inter-visibility and intra-visibility: The Council had already had regard to these. It was felt that, in addition to inter-visibility and intra-visibility regarding urban edges, consideration of inter and intra-visibility regarding development at the settlements would also be useful, as it relates to sense of, or perception of, the gap.

Sense of leaving a settlement: This was already one of the Council's criteria.

- 3.3 It was noted that there was some overlap or links with the Council's original criteria, as indicated above, and this was considered to justify their retention. This included consideration of landscape setting of the settlements. Use of that criterion was also supported by the fact that the ODPM document (page 6) states that the basic purposes of strategic gaps are "to protect the setting and separate identity of settlements, and to avoid coalescence". It is also supported by the wording of policy CS19: "The Council will protect strategic gaps to help retain the separate identity, character and/or landscape setting of settlements and distinct parts of settlements."
- 3.4 It was noted that the ODPM document (paragraph 4.17) refers to use of "location of land in relation to adjoining settlements" by Kent County Council. This was considered to be a useful criterion.
- 3.5 As mentioned, it was also felt that "sense of the gap" was an important consideration, and that inter and intra-visibility of development was relevant to that.
- 3.6 This analysis led to the Council identifying the following revised list of criteria for consideration in defining/review of strategic gaps.
  1. Location of land in relation to the settlements
  2. Sense of the gap
  3. Sense of leaving or arriving at a settlement
  4. Sense of place; perception of the separate identity of settlements or parts of a settlement; actual and perceived proximity of the settlements
  5. Landscape setting of the settlements or parts of a settlement
  6. Distance
  7. Topography
  8. Vegetation
  9. Landscape character/type

10. Existing uses and density of buildings
11. Inter-visibility (including ability to (1) see the edge of one settlement from the other, and (2) see development at one settlement from the other
12. Intra-visibility (including (1) ability to see the edges of both settlements from a single point, and (2) see development at both settlements from a single point)

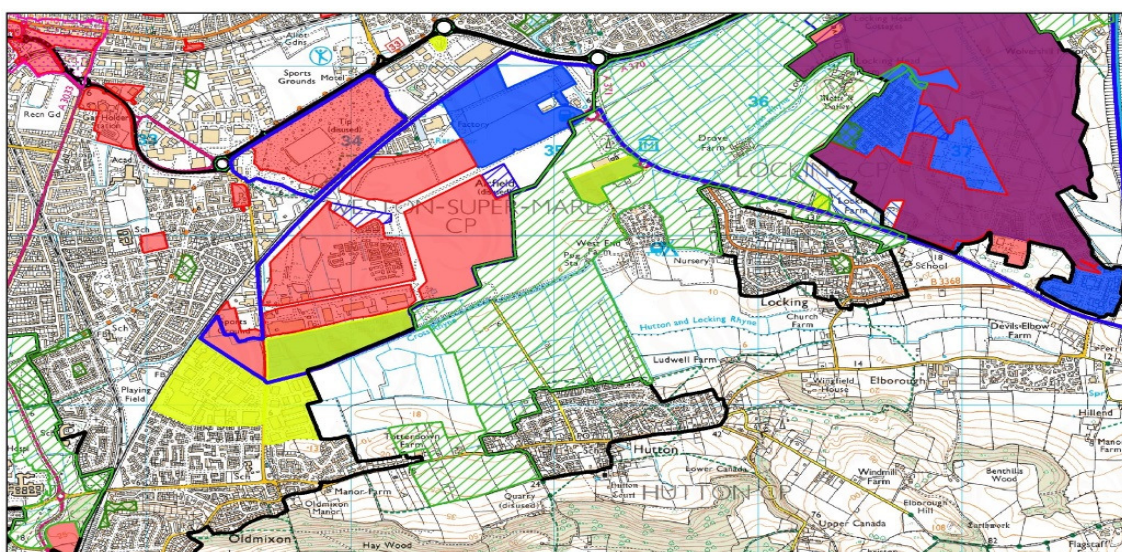
3.7 The Council used these criteria to review all the strategic gaps proposed in the Site Allocations Plan Consultation Draft of March 2016 (SAP), to see if any change to their boundaries is warranted. The criteria have been used in the round, considering each in reviewing the strategic gaps.

3.8 The results of the reviews is set out below.

#### 4.0 Review of strategic gap – between Weston- super- Mare and Hutton

**Description of proposed strategic gap in March 2016 Site Allocations Plan (SAP)**

- 4.1 The strategic gap is shown hatched green on the plan below, north of and west of Hutton:



- 4.2 The strategic gap includes two sections:
- 1) land straddling Moor Lane, Hutton, (a lane extending north from Hutton to the Cross Rhyne near the proposed south boundary of the developing Haywood Village, which is part of Weston super Mare)
- 2) land straddling Oldmixon Road between The Grange (farm) Hutton, and Totterdown Farm, Weston-super-Mare (hereon referred to as Weston).

## **Review in relation to criteria**

### **1. Location of land in relation to the settlements**

- 4.3 The strategic gap as drawn includes some largely undeveloped land between the two settlements, but on the map it appears very tightly drawn as it excludes a significant undeveloped area to the west. This excluded land warrants consideration.

### **2. Sense of the gap**

- 4.4 A clear perception of the gap is obtained from Moor Lane to the north of Hutton, from which some development at both settlements is visible in views across the flat, relatively open, undeveloped landscape of the moors; (intravisibility). However the existing gap has been drawn tightly, extending only a short distance westwards across these moors. The views across them from Moor Lane extend all the way to the settlement boundary of Weston (with development at Lynx Crescent visible, softened by trees). Thus it is logical that the strategic gap be extended.
- 4.5 There is undeveloped elevated land immediately south of, and raised above the moors which is also visible in views from Moor Lane, beyond which some limited development at Weston is visible, thus also appearing as a perceptible gap. This elevated land is also visible at closer range from Lynx Crescent, together with development at Hutton in the distance, again giving a perceptible gap; (see photo sequence 1 below). Development of this elevated land, particularly the western end, seen from Lynx Crescent, would destroy that perception. Therefore it should logically also be included in the strategic gap, but much of it is excluded.

### **3. Sense of leaving or arrival at a settlement**

- 4.6 This sense is perceived travelling between Weston and Hutton, along Oldmixon Road. It is particularly aided by the views of agricultural land on both sides of that road; (one such view is in photo WH1 below).
- 4.7 This sense is also perceived travelling between Hutton and Weston via a public footpath partly following the southern boundary of the strategic gap, within the Mendip Hills Area of Outstanding Natural Beauty (AONB). From there parts of the moors and elevated land are visible, including parts not within the strategic gap, strengthening the case for their inclusion within it.

Photo WH1: Looking north from Oldmixon Road to agricultural land west of The Grange, Hutton



#### **4. Sense of place, perception of the separate identity of settlements or parts of settlements, actual and perceived proximity of the settlements**

- 4.8 The extent and relatively open undeveloped nature of the land between the the settlements is important for retaining perception of their separate identity.
- 4.9 Development of even part of that intervening land would reduce the undeveloped gap between the settlements and have the actual and/or perceived effect of bringing them closer together. Such development could significantly erode that gap and reduce or adversely affect the actual or visual/perceived separation of the settlements, or perception of their separate identity. This would be apparent both from Moor Lane and from Lynx Crescent; (see photo sequences 1 and 2 below). These facts strongly point to the need to extend the strategic gap to the west.

#### **5. Landscape setting of the settlements or parts of the settlements**

- 4.10 The flat relatively open moors subdivided by hedges and rhynes, south of the Cross Rhyne, are distinctive to the landscape setting of Hutton, and also to this part of Weston. As mentioned, the views across them from Moor Lane extend west/south



westwards all the way to the settlement boundary of Weston, an aspect warranting change to the strategic gap.

- 4.11 As mentioned, the strategic gap excludes much of a largely open, elongated area of elevated land between Weston and Hutton, which is visible in part from Moor Lane, Lynx Crescent, and between/over development on the Oldmixon Road seen from that road and from the public footpath partly following the southern boundary of the strategic gap, within the AoNB. The elevated land is distinctive in the landscape, and is particularly important to the landscape setting of Weston, rising quite steeply from the flat land immediately adjoining Lynx Crescent, and including attractive elongated, rounded hillocks. However, because this land extends towards Hutton, as seen from Moor Lane, it is also important to the setting of that settlement.

**Photo sequence 1: Views of the elevated land from Lynx Crescent, Weston- super - Mare, (panning round looking east through to south). Development at Hutton is visible in the first three photos, and that at Weston is visible in the fourth photo.**





- 4.12 Seen more distantly from Moor Lane, (see photo sequence 2 below) this elevated land is viewed against the attractive wooded sloping land within the Mendip Hills AONB beyond. Thus the elevated, relatively open land is part of an attractive swathe of countryside between the two settlements which is very important to their separate identity and landscape setting, and also to views into and out of, and to the setting of, the AONB. Therefore it should be fully included in the strategic gap. This is another reason for extending the strategic gap to the west.

**Photo sequence 2: Views from Moor Lane, panning round looking south through to west**

- 2a.** Looking south towards Hutton from Moor Lane. View includes the wooded AONB beyond the village.



- 2b** Looking south south west, with Hutton still visible through trees, beyond the sheep-grazed moors





2c. Panning further westwards. Elevated open ground is visible in the background, beneath the wooded AONB, raised above the flat sheep-grazed moors.



2d. Panning further westwards. Some housing at Weston is visible towards the right, (west of the elevated open land), giving a sense of the gap. However, overall the extent of the relatively open undeveloped land between the settlements helps to convey the perception of their separate identity.



2e. View west from Moor Lane towards Weston. Development at Lynx Crescent is softened by trees.



## **6. Distance**

- 4.13 The part of the strategic gap straddling Moor Lane, is over 670m measured along that lane between the settlements' limits. However the east-west section between Totterdown Farm and The Grange (farm) is narrower (under 270m wide). The gap is tightly drawn and there is a particularly narrow section north of The Grange, of just over 30m only. This extreme narrowness points to a need to widen the strategic gap so that it extends further north of The Grange, to reduce risk of actual or perceived coalescence or harm to the separate identity of the settlements. Extending the strategic gap to the west, which other criteria point towards, would also achieve that.
- 4.14 If the strategic gap was extended west to the Weston settlement limits, that would mean that its west boundary near Lynx Crescent would be just under 1.1km from the north west settlement limits of Hutton, near Bisdee Road. That is comparable to the Yatton /Congresbury strategic gap which is about 1.2km across, north to south.

## **7. Topography**

- 4.15 As mentioned, the topography of the land between the two settlements includes the flat moors and the elevated land to the south, only parts of which are included in the strategic gap in the March 2016 SAP. For reasons mentioned under other criteria, the strategic gap should be extended further west/south west to include the remainder of these features up to the settlement boundary of Weston.

## **8. Vegetation**

- 4.16 Vegetation is generally fairly limited on the moors and elevated land: mainly hedgerows along field boundaries although in the moors area ryhnes alone separate some fields. There are trees softening the settlement boundary at Lynx Crescent, enhancing views across the relatively open, undeveloped landscape seen from Hutton Moor to the east.

## **9. Landscape character/type**

- 4.17 The Council has a [North Somerset Landscape Character Assessment Supplementary Planning Document](#), adopted in 2005. It indicates two Landscape Character Areas (LCAs) in the vicinity of the existing strategic gap. One is the A4 Locking and Banwell Moors to the north, characterised by low lying, generally flat landform, with regular geometric field patterns bounded by hedgerows and ryhnes. The other is the J2 River Yeo Rolling Valley Farmland, characterised by gentle rolling landform, to the south. The J2 LCA runs from the eastern edge of Weston near Woodside Avenue eastwards through Hutton itself, and includes the elevated land south of the moors referred to above, as well as some land within the AoNB south of Oldmixon Road.
- 4.18 Thus the Landscape Character Assessment reflects the topography of the land between the settlements which, as outlined above, is important to their landscape setting.

## **10. Existing uses and density of buildings**

- 4.19 Most of the existing strategic gap is agricultural land. There are some intermittent buildings (farm buildings, employment premises, and two dwellings) north of Oldmixon Road, and allotment gardens to the south.

## **11. Inter-visibility (including ability to (1) see the edge of one settlement from the other, and (2) see development at one settlement from the other; and**

- **12. Intra-visibility (including (1) ability to see the edges of both settlements from a single point, and (2) see development at both settlements from a single point)**

- 4.20 There is some intra-visibility between Weston and Hutton from Moor Lane, across the flat moors and adjoining elevated land, conveying the sense of the gap. However, as



mentioned, this extends further west/south west than the strategic gap in the 2016 SAP. This reinforces the case to extend the strategic gap.

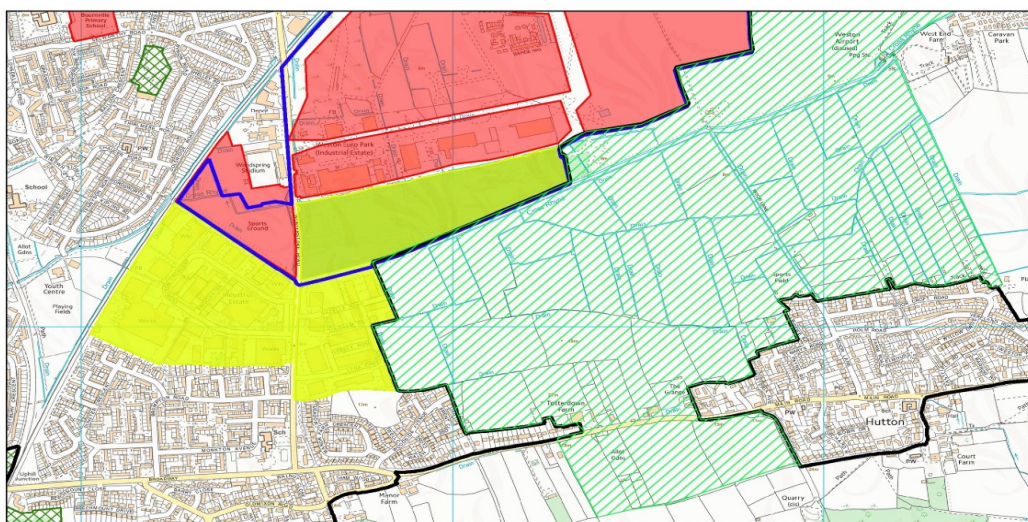
- 4.21 As mentioned, looking east from Lynx Crescent, Weston, development at Hutton is visible in the background, as shown in photo sequence 1. This similarly conveys the sense of the gap and again reinforces the case to extend the strategic gap.

### **Issues/analysis**

- 4.22 Taking account of the issues identified above there is a need to extend the strategic gap to the west/south west. Having regard to those issues, the settlement boundary of Weston is the logical place to take the boundary to.

### **Conclusion/Recommendation**

- 4.23 – Strategic gap is extended to the west to the settlement boundary of Weston, as shown hatched green on the plan below.

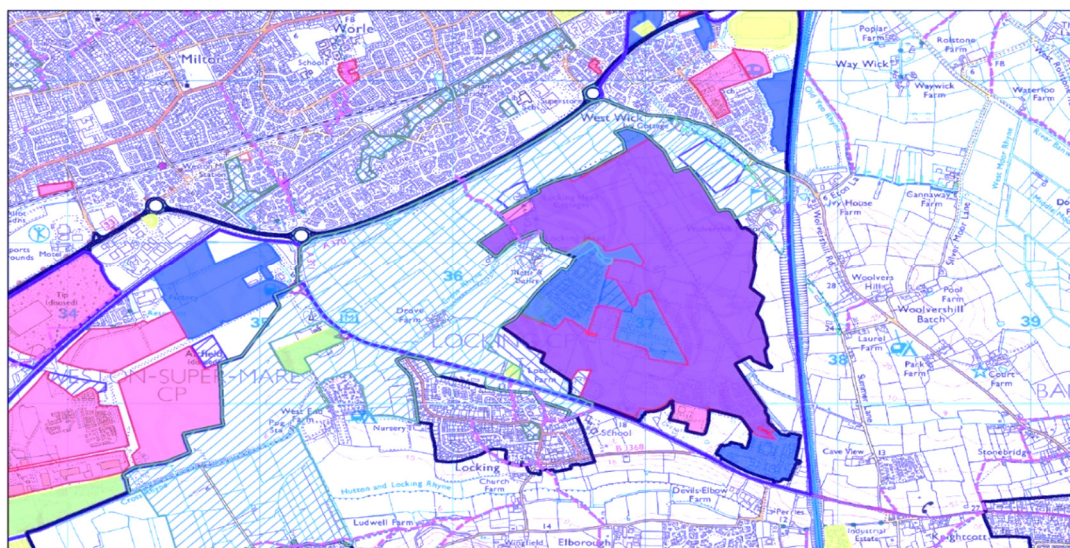


## **5.0 Review of Strategic Gap – between Weston- super- Mare, Locking and Parklands Village**

### **Description of proposed Strategic Gap in March 2016 Plan**

5.1 The strategic gap between these settlements is shown hatched green on the plan below. It lies between the A370 (immediately south of Weston) and the developing Parklands Village, and includes further relatively open land between that village and West Wick (part of Weston) to the north east. The A371 crosses the strategic gap and there is only a narrow area of undeveloped land between that road (which adjoins Parklands Village) and Locking village.

5.2 West of Locking is a park homes site, called Oaktree Park. Very close (to the north) of that along the A371 is the helicopter museum and adjoining employment land. The developing Haywood Village (part of Weston) is then a very short distance beyond. The short intervening undeveloped areas between these developments are important parts of the strategic gap.



### **Review in relation to criteria**

#### **1. Location of land in relation to the settlements**

5.3 The defined strategic gap logically falls between the settlements of Weston (which includes Haywood Village), Locking and Parklands Village. Haywood Village and Parklands Village are under construction and parts of them have yet to be developed. This has meant that definition of the strategic gap boundary has had to have regard to the adopted Weston Villages Supplementary Planning Document which indicates the proposed extent of their development.

## **2. Sense of the gap**

- 5.4 The sense of the gap can be perceived from places such as the A371/Elm Tree Road junction near Locking Village. From there development at Locking can be seen (see photo WLP1 below), and also development at Weston across the strategic gap, to the north (photo WLP2) This is an example of intra-visibility.

Photo WLP1 Looking south towards Locking from the A371/Elm Tree Road junction.



Photo WLP2 Looking north towards Weston from the same point (A371/Elm Tree Road junction)





**3. Sense of leaving or arriving at a settlement**

- 5.5 This sense is obtained when travelling between Weston and Locking village along the A371, particularly south of the Beaufighter Road/Locking Moor roundabout at the entrance to Haywood Village (part of Weston).

**4. Sense of place, perception of the separate identity of settlements or parts of settlements, actual and perceived proximity of the settlements**

- 5.6 Locking village and Parklands Village are physically close together, so the strategic gap between them is narrow, as indicated under criterion 6 below, emphasising the great significance of this part of the strategic gap, regarding risk of coalescence. This actual proximity is a very significant factor.
- 5.7 The overall distance between Haywood Village (Weston) and Locking village is greater, but south of the A371 the strategic gap between them is broken by areas of intervening development, including the helicopter museum/employment premises and Oaktree Park. This means there are only relatively narrow undeveloped areas between those developments, making them particularly important parts of the strategic gap for maintaining the separate identity of the settlements. Some of the developments and undeveloped areas can be seen in photo WLP4 below.

Photo WLP4 Looking south east from the entrance to Haywood village towards buildings at the helicopter museum, with Locking village beyond.



**5. Landscape setting of the settlements or parts of a settlement.**

5.8 The landscape within the strategic gap includes a large flat area of moors at the north, visible from the A370, with more varied topography beyond (east of) Drove Farm and the Cross Rhyne.

5.9 There is some raised land (Motte and Bailey scheduled monument) wooded on its north west side, near Locking Head Farm.

**6. Distance**

5.10 The narrowest part of the strategic gap in terms of distance between existing/proposed settlement limits is under 100m (between Parklands Village's southern extent of proposed mixed use development at the A371, and Locking village). However if the strategic gap further west is measured (between land proposed for educational facilities at Parklands Village and Locking village), that is only about 50m. This emphasises the importance of these narrow parts of the strategic gap.

**7. Topography**

5.11 The strategic gap comprises a combination of the flat moors with more variable topography as covered under landscape setting of settlements above.

**8. Vegetation**

5.12 Vegetation includes hedgerows along field boundaries. However in the moors area ryhnes alone separate some fields.

5.13 There is some woodland at the Motte and Bailey scheduled monument.

**9. Landscape character/type**

5.14 The Council's Landscape Character Assessment indicates two Landscape Character Areas (LCAs) in the vicinity of this strategic gap, (the A4 Locking and Banwell Moors and the J2 River Yeo Rolling Valley Farmland).

5.15 The J2 land characterised by gentle rolling landform includes Locking village and much of Parklands Village, and includes most of the parts of the strategic gap lying between them. The A4 land (characterised by flatter landform as indicated in paragraph 4.17 above) occupies the northern part of the strategic gap running up to the A370 and Churchland Way bordering Weston super Mare.

**10. Existing uses and density of buildings**

5.16 There is mainly agricultural land with farms at low density in the strategic gap. There are various uses adjoining it, such as the park homes site and the helicopter museum and adjoining employment building. (See photo WLP5.)

Photo WLP5: Looking south from the entrance to Haywood village across part of the strategic gap





- **11.Inter-visibility (including ability to (1)see the edge of one settlement from the other, and (2)see development at one settlement from the other; and**
- **12.Intra-visibility (including (1) ability to see the edges of both settlements from a single point, and (2) see development at both settlements from a single point)**

5.17 As mentioned, there is intra-visibility between Weston and Locking village seen from the A371 near its junction with Elm Tree Road, close to Locking, near the edge of the strategic gap.

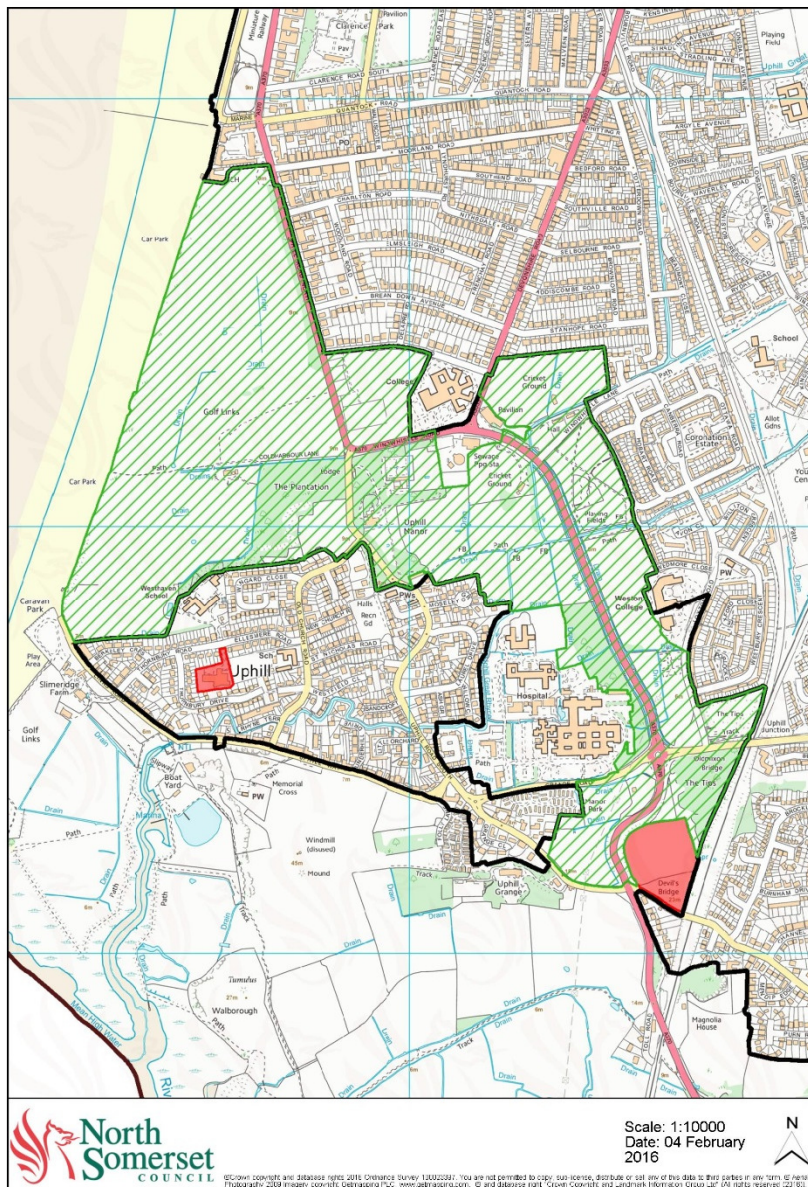
### **Issues/analysis**

5.18 Taking account of the above, there is no identified need to amend the boundaries of this strategic gap.

## 6.0 Review of Strategic Gap- between Weston and Uphill

### Description of proposed Strategic Gap in March 2016 Plan

- 6.1 This strategic gap is shown hatched green on the plan below. It straddles the A370 and includes mainly flat land between the golf course in the north and the hospital area towards the south. However there is some higher land further south still, by the A370.



### Review in relation to criteria

**1.0 1. Location of land in relation to the settlements**

- 6.2 The strategic gap as drawn logically includes land between the two settlements. It excludes some developed land which falls outside the settlement limits, notably at the hospital, which is perceived to be part of Uphill.

**2. Sense of the gap**

- 6.3 The sense of the gap can be perceived from the vicinity of the hospital roundabout at the A370/Grange Road/Broadway, from which development at both settlements is visible; (intra-visibility). That includes the hospital itself which, as mentioned, is perceived to be part of Uphill.
- 6.4 Similarly the sense of the gap can be perceived from the A370 south of Jubilee Park affording views west towards Uphill (housing and St Nicholas' Church), and east towards housing at Weston, so again views of development at both settlements; (see photos WU1 and WU2).

Photo WU1: Looking west from the A370 towards Uphill



Photo WU2: Looking east from the same point towards Weston



**3. Sense of leaving or arriving at a settlement**

- 6.5 This sense is perhaps best obtained by walking a public footpath from near St Nicholas' Church at Uphill through to Weston near Jubilee Park. It can also be obtained by travelling from Weston past the golf course, southwards towards Uphill via Uphill Road South.

**4. Sense of place, perception of the separate identity of settlements or parts of settlements, actual and perceived proximity of the settlements**

- 6.6 The distance between the settlements varies, but the width of the strategic gap between Weston and the hospital (perceived as being part of Uphill) is particularly narrow, as indicated in criterion 6. This proximity means that the strategic gap is very important with regard to maintaining the separate identity of the settlements.

**5. Landscape setting of the settlements or parts of a settlement.**

- 6.7 Much of the land in the strategic gap is flat and includes low lying fields and playing fields either side of the A370, and Jubilee Park. The section south of the hospital roundabout includes more prominent land rising up above the A370, including attractive well wooded land. That contributes to the landscape setting of the settlements, visible from the A370.



**6. Distance**

- 6.8 The strategic gap is widest at the north west end (over 1km across the length of the golf course), but is mostly under 500m width, and narrows to about 150m near the hospital.

**7. Topography**

- 6.9 The topography is largely flat (fields and golf course etc) with some higher land to the south, as indicated above.

**8. Vegetation**

- 6.10 In addition to hedgerows along field boundaries there are some areas of woodland, notably the following locations: south east of the hospital roundabout, and straddling the A370 further south; alongside the A370 east of the hospital; the grounds to Uphill Manor; and land at “The Plantation” west of Uphill Road South. There is also a belt of trees at the golf course, alongside Uphill Road North.

**9. Landscape character/type**

- 6.11 The Council’s Landscape Character Assessment indicates that it is mainly the C1 LCA (Weston Bay Settled Coastal Edge) in this strategic gap, characterised by level lowland founded on Beach and Tidal Flats and Mercia Mudstone. However the higher land south of the hospital roundabout is within the E1 LCA (Mendip Ridges and Combes) characterised by steep scarp slopes clothed in broad leaved and mixed woodland forming distinctive backdrop to the surrounding low lying areas. This reflects the change in the topography in this southern part of the strategic gap.

**10. Existing uses and density of buildings**

- 6.12 The strategic gap includes agricultural fields, golf course, Uphill Manor, playing fields, woodlands and grounds to institutions such as the Weston College University Campus. However, buildings within the strategic gap are few and at a low density.

**11. Inter-visibility (including ability to (1)see the edge of one settlement from the other, and (2)see development at one settlement from the other; and**

**12. Intra-visibility (including (1) ability to see the edges of both settlements from a single point, and (2) see development at both settlements from a single point)**

6.13 As mentioned, intra-visibility is evident from places such as the hospital roundabout, and from the A370 near Jubilee Park, from which development at both settlements is visible.

**Issues/analysis**

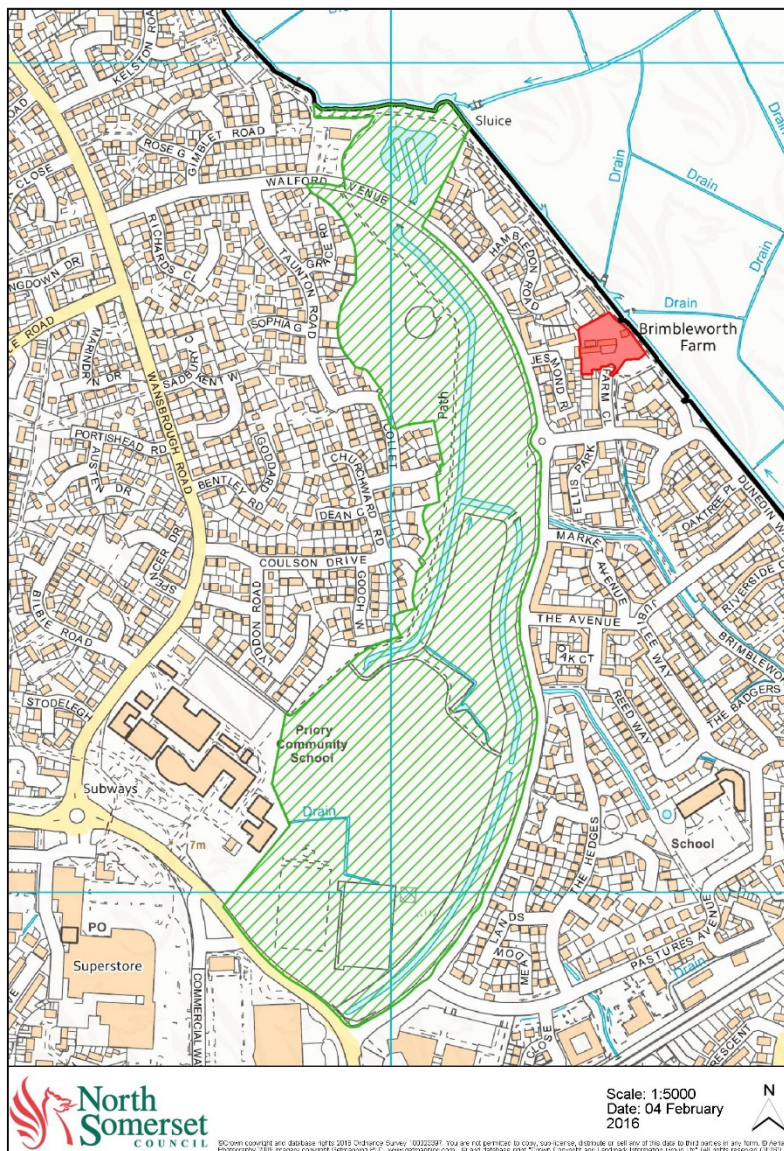
6.14 Taking account of the above there is no identified need to amend this strategic gap.



## 7.0 **Review of Strategic Gap- between Weston-super-Mare and St Georges**

### **Description of proposed Strategic Gap in March 2016 Plan**

- 7.1 This strategic gap is shown hatched green on the plan below. It includes fairly flat land mainly west of, but in part subdivided by, Walford Avenue. Priory Community School buildings lie adjacent to the south west part of the strategic gap.



### **Review in relation to criteria**

#### **1. Location of land in relation to the settlements**

- 7.2 The strategic gap as drawn logically includes land between the two parts of the settlement. It excludes buildings at Priory Community School.

## 2. Sense of the gap

- 7.3 The sense of the gap can be perceived from Walford Avenue on the east side of the strategic gap, from which development at both sides of the gap is visible; (inter and intra-visibility). (See photo WSG 1below).

Photo WSG1 looking NNW from SE side of the gap, Walford Avenue



- 7.4 Similarly the sense of the gap can be obtained from the west side of the gap, as shown below, in photo WSG2.

Photo WSG2 Looking NNE from west side of strategic gap, near play area





### **3. Sense of leaving or arriving at a settlement**

- 7.5 To some extent the sense of leaving St Georges and arriving at a separate part of Weston can be perceived from the road Queensway, at the south end of the gap. However the school playing fields with fenced artificial surfaces detract from that sense somewhat.

### **4. Sense of place, perception of the separate identity of settlements or parts of settlements, actual and perceived proximity of the settlements**

- 7.6 Perception of the separate identity of the two parts of the settlement is aided by the relatively open, green, undeveloped nature of the strategic gap.

### **5. Landscape setting of the settlements or parts of a settlement.**

- 7.7 The strategic gap makes some contribution in so far as it provides an important visual break in the urban fabric. This is shown in photo WSG3.

Photo WSG3, looking SSW across the strategic gap from Walford Avenue, showing how the strategic gap provides a visual break in the urban fabric



## **6. Distance**

- 7.8 This gap is elongated, about 110m across at its narrowest, but widening to about 300m at its southern end.

## **7.Topography**

- 7.9 The gap is mainly flat with little topographical variation

## **8.Vegetation**

- 7.10 The strategic gap is largely grass and low vegetation. There is a line of trees alongside Walford Avenue and areas of trees/bushes in some locations, notably north of the school playing fields, by the play area, (see photo WSG4) and at the north extremity, where there is a wetland area.

Photo WSG4 showing trees near the play area, in the strategic gap



## **9. Landscape character/type**

- 7.11 The Council's Landscape Character Assessment does not identify an LCA in this area but simply shows the broad area of Weston as "Settlement" on the relevant map. However, this does not imply that a change is needed to this strategic gap.

## **10. Existing uses and density of buildings**

- 7.12 The strategic gap includes school playing fields but excludes the school buildings. No buildings lie within it. It includes recreational open space, as shown in photo WSG, and is crossed by footpaths.

Photo WSG5, showing recreational open space in the strategic gap



11. **Inter-visibility (including ability to (1)see the edge of one settlement from the other, and (2)see development at one settlement from the other; and**
12. **Intra-visibility (including (1) ability to see the edges of both settlements from a single point, and (2) see development at both settlements from a single point)**
- 7.13 As mentioned, development at Weston can clearly be seen from St Georges across the strategic gap, looking from points along Walford Avenue, providing both inter and intra-visibility. The same applies looking east towards St Georges from points of

public access on the Weston side of the gap (such as off Taunton Road/Collett Close). This is shown in photos WSG1 and WSG2 above.

### **Issues/analysis**

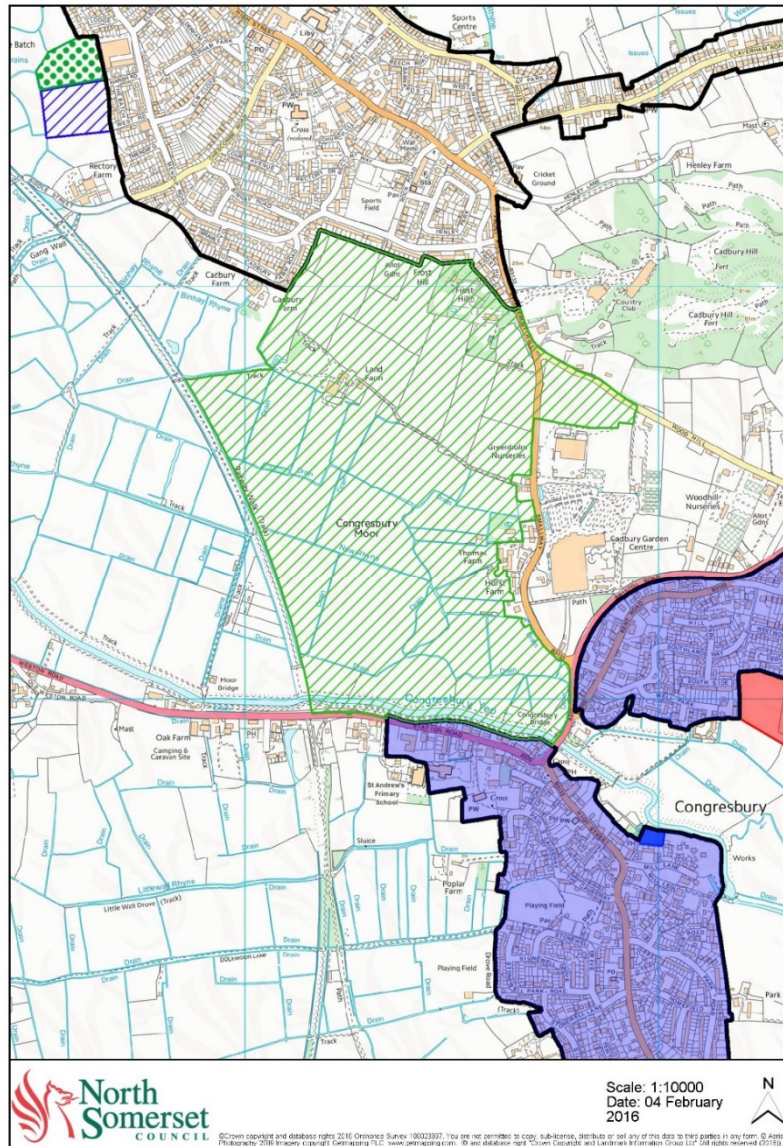
- 7.14 Taking account of the above there is no identified need to amend this strategic gap.



## 8.0 Review of Strategic Gap between Yatton and Congresbury

### Description of proposed Strategic Gap in March 2016 Plan

- 8.1 This strategic gap is shown hatched green on the plan below. It lies west of an area of Green Belt which is east and north east of the roads Frost Hill (B3133) and Woodhill. This has been taken into account in defining the strategic gap.



### Review in relation to criteria



## **1. Location of land in relation to the settlements**

- 8.2 The strategic gap as drawn logically includes land between the two settlements. It extends west to the Strawberry Line foot/cycleway, a strong clearly defined boundary. The Strawberry Line links with a public footpath running to the middle of the strategic gap near Land Farm, from which development at both settlements can be seen.

## **2. Sense of the gap**

- 8.3 The sense of the gap can be appreciated from the public footpath near Land Farm, from which development at both settlements is visible across the strategic gap. Photo CY1 below shows the view from that footpath towards Congresbury.

Photo CY1.



- 8.4 Yatton, notably S Mary's Church, can also be seen across the strategic gap from the road bridge over the River Congresbury Yeo at Congresbury, as shown in photo CY2 below. This also conveys the sense of the gap.



Photo CY2.

### **3. Sense of leaving or arriving at a settlement**

- 8.5 This can perhaps best be perceived from the B3133 (Frost Hill/Smallway) south of Yatton, since it includes a stretch of road with no built development on either side, north of the garden centre/nursery developments. Those developments are perceived to be part of Congresbury, although outside the settlement boundary.

### **4. Sense of place, perception of the separate identity of settlements or parts of settlements, actual and perceived proximity of the settlements**

- 8.6 The extent of the strategic gap, and its green undeveloped nature significantly contributes to perception of the separate identity of the two settlements.

### **5. Landscape setting of the settlements or parts of a settlement.**

- 8.7 There are attractive views across the strategic gap seen from the B3133 in the undeveloped stretch referred to above, taking in high lying land near Yatton (see photo CY4) and the lower lying land to the south west across Congresbury Moor. There are also attractive views of the River Congresbury Yeo and Congresbury Moor, (at and towards the southern end of the strategic gap), from the A370 at Congresbury Bridge; (see photo CY3). The landscape setting of Congresbury in particular, looking across Congresbury Moor, can also be appreciated from the Strawberry Line. All these views show the importance of the strategic gap to the landscape setting of the settlements.

Photo CY3. Looking north west from Congresbury Bridge at southern part of the strategic gap



Photo CY4: View looking north west from the road Smallway across the strategic gap towards high-lying land near Yatton



## **6. Distance**

- 8.8 The part of the strategic gap between the settlement limits of Yatton and Congresbury west of Smallway, is about 1.2km across. However there is a much narrower section of under 280m from Yatton settlement limits south to the nurseries development on the east side of Smallway, (perceived to be part of Congresbury).

## **7. Topography**

- 8.9 There is a slope down southwards from the vicinity of Frost Hill on the north side of the strategic gap. Congresbury Moor to the south is flatter.

## **8. Vegetation**

- 8.10 The area is generally pasture land subdivided by hedgerows. There are some areas with larger groups of trees, notably north of Thomas Farm near Smallway, south west of Land Farm, and at Frost Hill.

## **9. Landscape character/type**

- 8.11 The Council's Landscape Character Assessment indicates the A1 Kingston Seymour and Puxton Moors LCA, characterised by lowland flat landform, and the J2 River Yeo Rolling Valley Farmland LCA in the vicinity of this strategic gap. The A1 land lies north of the river and includes the southern and western parts of the strategic gap,

including Congresbury Moor. The J2 land, characterised by gentle rolling landform, is in the north east part of the strategic gap, including Frost Hill.

#### **10. Existing uses and density of buildings**

- 8.12 The main land use is agricultural, with farm buildings at Land Farm and one or two large dwellings (very low density) in extensive grounds at Frost Hill.
- 11. Inter-visibility (including ability to (1)see the edge of one settlement from the other, and (2)see development at one settlement from the other; and**
- 12. Intra-visibility (including (1) ability to see the edges of both settlements from a single point, and (2) see development at both settlements from a single point)**
- 8.13 As mentioned, there is intra-visibility of both settlements from the public footpath near Land Farm.

#### **Issues/analysis**

- 8.14 Taking account of the above there is no identified need to amend the strategic gap.



## 9.0 Review of Strategic Gap between Nailsea and Backwell

### Description of proposed Strategic Gap in March 2016 Plan

- 9.1 This strategic gap is shown hatched green on the plan below. To the east of Station Road on the east boundary there is Green Belt, so the strategic gap has been drawn to take account of that. The strategic gap is crossed by a narrow rural lane (Youngwood Lane) which runs down the south-facing slope from the elevated southern edge of Nailsea at The Perrings, before turning westwards. South of that, between the lane and the railway line, is flatter low lying land. The strategic gap is crossed/bounded by public footpaths, including one near the high-lying north boundary at Morgan's Hill. The strategic gap includes Backwell Lake, as shown on Photo NB1.

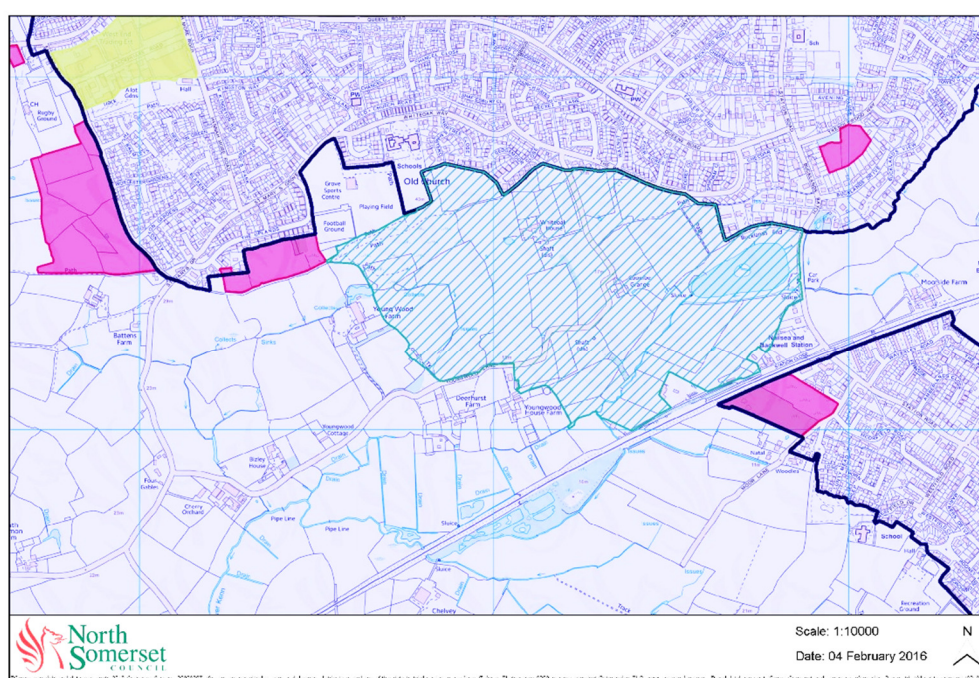


Photo NB1. Backwell Lake on the east side of the strategic gap.





## **Review in relation to criteria**

### **1. Location of land in relation to the settlements**

- 9.2 The strategic gap logically includes land between the two settlements. As mentioned, land east of Station Road is within the Green Belt, so is excluded from the strategic gap.

### **2. Sense of the gap**

- 9.3 The sense of the gap can particularly be perceived from places from which development at both settlements can be seen. These are some examples:

- open space at The Perrings, Nailsea; (see photo NB2);
- public footpaths in/bordering the strategic gap, for example: Morgans Hill public footpath/bridleway, Nailsea; (viewpoints at certain places in a stretch running roughly from The Perrings west to the Grove Sports Centre area; (see photo NB5)).

Photo NB2: Looking south east towards Backwell from public open space at The Perrings on the the edge of Nailsea



### **3. Sense of leaving or arriving at a settlement**

- 9.4 This sense can be perceived from Station Road which runs between Nailsea and Backwell, affording views of trees at the Backwell Lake area in the strategic gap, as shown in photo NB 3 below.

Photo NB3.



### **4. Sense of place, perception of the separate identity of settlements or parts of settlements, actual and perceived proximity of the settlements**

- 9.5 The extent of the gap, and its green undeveloped nature, help convey the perception of the separate identity of the two settlements. The topography, notably the undeveloped south facing slope and flatter land to the south, also contribute to this. There are relatively open fields sloping up to the ridgeline on the south side of Nailsea, and development at Nailsea has not yet spilt over that ridgeline onto the slope below. This is important to maintaining the perceived/visual and actual separation of the settlements, and hence perception of their separate identity. It can be appreciated from Youngwood Lane (see photo NB4 below) and public footpaths extending north from it, like those north of Youngwood House Farm.

Photo NB4 Looking north from Youngwood Lane across the strategic gap towards the ridgeline on the southern edge of Nailsea.



#### **5. Landscape setting of the settlements or parts of a settlement.**

- 9.6 The land within the strategic gap, particularly the undeveloped slope, descending from the high-lying southern edge of Nailsea, is very important to the landscape setting of the settlements. As mentioned, it is visible from places such as Youngwood Lane, and public footpaths across the strategic gap, like those extending north from Youngwood Lane. There are also very attractive views across the strategic gap from the Morgan's Hill footpath, (see photo NB5 below) and areas such as the public open space at The Perrings, as seen in Photo NB2. The flatter pasture land to the south, (again visible from public footpaths (like that east of Youngwood House Farm), and from Youngwood Lane), and the attractive Backwell Lake, with nearby trees, also contribute to the landscape setting of the settlements. The attractiveness of land in the strategic gap, reflecting its topography and green, undeveloped nature, can also be appreciated from the platform to Nailsea and Backwell station, (and hence when travelling by train).

Photo NB5 Looking towards Backwell from the popular public footpath at Morgan's Hill on the high-lying southern edge of Nailsea



- 9.7 As mentioned it is important to continue to protect the slope from built development, since spill of development over the ridgeline at the top, onto the undeveloped slope below, would be likely to harm the landscape setting of the settlements. As indicated in paragraph 9.5 it would also be likely to adversely affect the separate identity and character of the settlements.

#### **6. Distance**

- 9.8 There is a relatively narrow section of the strategic gap (under 200m) along Station Road, on the east boundary, between housing at Nailsea and housing perceived to be at Backwell, north of the station.

#### **7. Topography**

- 9.9 As mentioned, there is a south-facing slope down from the high-lying southern edge of Nailsea to the flatter land north of the railway.

#### **8. Vegetation**

- 9.10 The strategic gap largely comprises pasture land subdivided by hedgerows. There are areas of trees in the vicinity of Backwell Lake. The grass space off Sedgemoor Close has a number of individual trees, while south west of that is a Wildlife Site with bracken and other vegetation.

## **9. Landscape character/type**

- 9.11 The Council's Landscape Character Assessment identifies three LCAs in the vicinity of this strategic gap: K1 Nailsea Farmed Coal Measures, B1 Land Yeo, Kenn River and River Avon Flood Plain, and J5 Land Yeo and Kenn Rolling Valley Farmland. Most of the strategic gap is within the K1 land which adjoins the southern edge of Nailsea at The Perrings, runs to south of Youngwood Lane, and extends well to the west of the strategic gap and Nailsea. The K1 LCA is characterised by elevated, gently undulating landform.
- 9.12 The B1 land lies to the south and south east of the K1 area, and includes Backwell Lake and the stream to its south west, and continues south west to the railway line. The B1 LCA is characterised by level lowland based on Alluvium, River Terrace Deposits and Head.
- 9.13 The very limited area of J5 land lies in the south eastern corner of the strategic gap, south of Backwell Lake, (but also extends south of the strategic gap beyond the railway line to cover most of Backwell). The J5 LCA is characterised by gently undulating landform based on Mercia Mudstone with Head and Alluvium..

## **10. Existing uses and density of buildings**

- 9.14 The main land use is agricultural, with just two dwellings in the strategic gap, so at very low density. Backwell Lake is another feature. Outside but adjacent to the strategic gap are some farms, railway station car park, and some dwellings.
- 11. Inter-visibility (including ability to (1)see the edge of one settlement from the other, and (2)see development at one settlement from the other; and**
- 12. Intra-visibility (including (1) ability to see the edges of both settlements from a single point, and (2) see development at both settlements from a single point)**
- 9.15 As indicated in paragraph 9.3, there are places from which development at both settlements can be seen across the strategic gap (intra-visibility).
- 9.16 Taking account of the above, there is no identified need to amend the strategic gap.



## **10.0 Assessment and conclusion from overall review of strategic gaps**

- 10.1 The review points to a need to amend (extend) the boundary of only one of the strategic gaps, between Weston-super-Mare and Hutton, as indicated on the map below paragraph 4.23 in this document. No need has been identified to amend the boundary of the other strategic gaps.
- 10.2 The review will be taken into account in preparing the next (Publication) version of the Site Allocations Plan.

## **APPENDIX 1 Background information 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.**

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 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) included 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 Plan Consultation Draft of March 2016 were very similar.
- 2.6 However, having regard to responses to public consultation on that plan, it was considered that a review of the strategic gaps was needed. As documented in this document, the review took place in summer 2016, and identified a need to extend the strategic gap between Weston-super-Mare and Hutton. That was taken into account in preparing the next (Publication) version of the Site Allocations Plan.
- 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 to 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 and Core Strategy, and emerging policies in the Sites and Policies Plan Part 1 Development Management Policies (SAPP1) 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 (SAPP1 policy DM53);
  - ancillary buildings and intensification of use for existing businesses (SAPP1 policy DM55);
  - new buildings for visitor accommodation (SAPP1 policy DM57);

- camping and caravan sites (SAPP1 policy DM58);
- garden centres (SAPP1 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), (SAPP1 policy DM69);
- new buildings for agriculture and land based rural businesses like farm shops (SAPP1 policy DM51);
- equestrian development (SAPP1 policy DM52);
- rural workers' dwellings (SAPP1 policy DM46);
- sites for gypsies, travellers and travelling show people (Core Strategy policy CS18);
- rural affordable housing exceptions schemes (Core Strategy policy CS17);
- 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, (SAPP1 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.