

North Somerset Local Plan 2038

Strategic Gaps

March 2022

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Background paper on strategic gaps, to support the North Somerset Local Plan to 2038 Preferred Options (Consultation Draft)

Introduction

In preparing the new Local Plan the Council has reviewed the strategic gap designation which was introduced in the adopted North Somerset [Core Strategy](#) and [Site Allocations Plan](#).

This background paper documents the review. It considers whether the strategic gaps designation is still fit for purpose. It reviews the existing strategic gaps in the Site Allocations Plan, including consideration of whether any should be amended or deleted, or new ones designated.

Are strategic gaps still needed?

The Council considers that the strategic gap designation is still needed for the following reasons.

Strategic gaps can play an important role in maintaining the local character and distinctiveness of the settlements, and the sense that they are separate places. Identification and protection of strategic gaps will help to prevent their erosion by incremental development which would be detrimental to the settlements' separate identities, character and/or landscape setting. Such protection is particularly important where the erosion could potentially cause coalescence of the settlements.

Strategic gaps provide a different stronger dimension to countryside policies in specific areas where there is potential for harm which might be less significant elsewhere. In those areas reliance on countryside policies alone would be unlikely to provide sufficient protection against the reduction or loss of such important gaps to development, particularly in the long term. While such policies provide some control of development in the countryside, they often allow for exceptions. Without the added protection of strategic gap designation, there is a significant risk that incremental development would eventually erode the gaps, with the detrimental effects identified above.

Strategic gaps are consistent with the [National Planning Policy Framework \(NPPF\)](#) paragraph 130 which states that planning policies and decisions should ensure that developments '*c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities)*'.

Protection of strategic gaps is compatible with this by helping to keep settlements separate and respecting the fact that they have historically grown as separate places, typically with their own local character. Also strategic gaps help maintain the landscape setting of the settlements.

For similar reasons protecting strategic gaps is compatible with the Government's [National design guide](#) (NDG), particularly two of the ten characteristics for design of well-designed places: context and identity.

Context relates to *'the location of the development and the attributes of its immediate, local and regional surroundings'*; (paragraph 38 of NDG). It relates to how *'an understanding of context, history and the cultural characteristics of a site, neighbourhood and region influences the location, siting and design of new developments. It means they are well grounded in their locality and more likely to be acceptable to existing communities. Creating a positive sense of place helps to foster a sense of belonging and contributes to well-being, inclusion and community cohesion'* (our underlining; paragraph 39 of the NDG).

Identity relates to the *'way that buildings, streets and spaces, landscape and infrastructure combine together and how people experience them. It is not just about the buildings or how a place looks, but how it engages with all of the senses. Local character makes places distinctive and memorable and helps people to find their way around. Well-designed, sustainable places with a strong identity give their users, occupiers and owners a sense of pride, helping to create and sustain communities and neighbourhoods'* (our underlining; paragraph 50 of the NDG).

Strategic gaps are compatible with both context and identity, by controlling location of new developments to help ensure the settlements retain their separate identity and sense of place, and that the historic development of the settlements as separate places is respected. This will also help reinforce the sense of belonging to the particular settlement and its community, and aids community cohesion, referred to above.

Without protection of strategic gaps there is a risk that these important aspects would be lost, particularly where there is a significance risk of coalescence.

Page 10 of the NDG further indicates that context is relevant to settlements, as it shows a photo of Ilkley, West Yorkshire, set in the countryside, with the caption *'The topography, landscape character, cultural history and built form all define the context for Ilkley'*. It would be difficult to define a context for such a settlement if it was allowed to coalesce with a neighbouring settlement.

Paragraph 53 of the NDG refers to well-designed new development being influenced by various things, including *'the elements of a place or local places that make it distinctive'*, including for example *'views, vistas and landmarks'*, and *'soft landscape, landscape setting and backdrop'*. Again the reference to landscape setting, which strategic gaps help to protect.

Strategic gaps also often include green infrastructure (GI) and are particularly useful in helping to protect GI close to settlements and their communities, giving them convenient proximity to all the potential benefits of GI. Such benefits are referred to

in the national Planning Policy Guidance (NPPG) section on Natural Environment (para 006). They include the contribution to carbon storage, cooling and shading, sustainable drainage, natural flood risk management, wildlife corridors, attractive places for recreation and exercise, (especially where crossed by public rights of way), with the added interest of biodiversity and natural beauty.

For similar reasons strategic gaps are consistent with social and environmental objectives set out in paragraph 8 of the NPPF.

Similarity to Green Belt

Strategic gaps have a broad similarity to some of the purposes of Green Belts in that they can 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). However strategic gaps operate on a more localised, focused scale than Green Belts.

In view of this similarity it is considered inappropriate for strategic gaps and Green Belt to overlap, which has had implications in reviewing strategic gaps, in preparing the Local Plan.

Factors considered in reviewing strategic gaps

The existing strategic gaps in the adopted SAP were drawn with regard to criteria for defining strategic gaps set out in a previous [Strategic Gaps Background Paper 2016](#).

The Council has reviewed the strategic gaps using similar criteria, but has looked at the scope for reducing strategic gaps to see if this is possible without adversely affecting the objectives and strengths of strategic gaps, making sure that they are still fit for purpose. This has included consideration of the potential impact on the strategic gaps of sites identified through the Strategic Housing Land Availability Assessment.

The review has also considered whether any planning consents point to revisions to strategic gap boundaries, and whether there any factors which suggest that a strategic gap should be deleted entirely.

The 2016 background paper included 12 criteria to be considered in defining strategic gaps. The Council has now reviewed those criteria, which were:

- 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 settlements, 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)

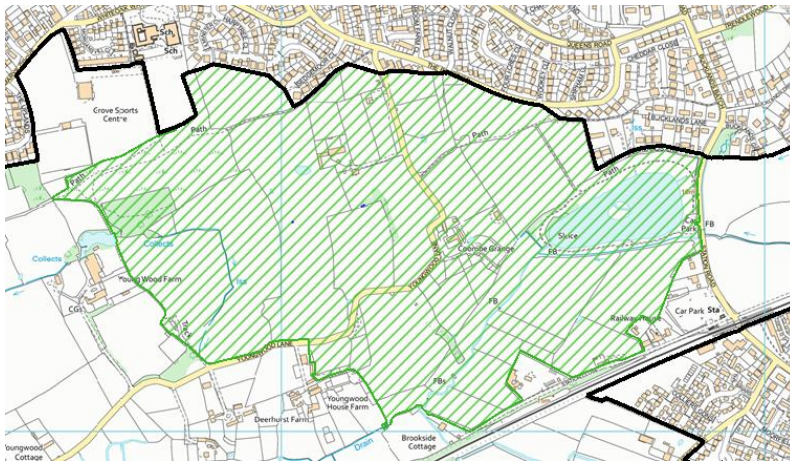
The Council considers that the criteria are mostly still appropriate, but with one amendment needed: Criterion 5 should read 'Landscape setting of the settlements' since the Council no longer feels that strategic gaps should be between parts of a single settlement.

Review of existing strategic gaps

A. Strategic gap between Nailsea and Backwell

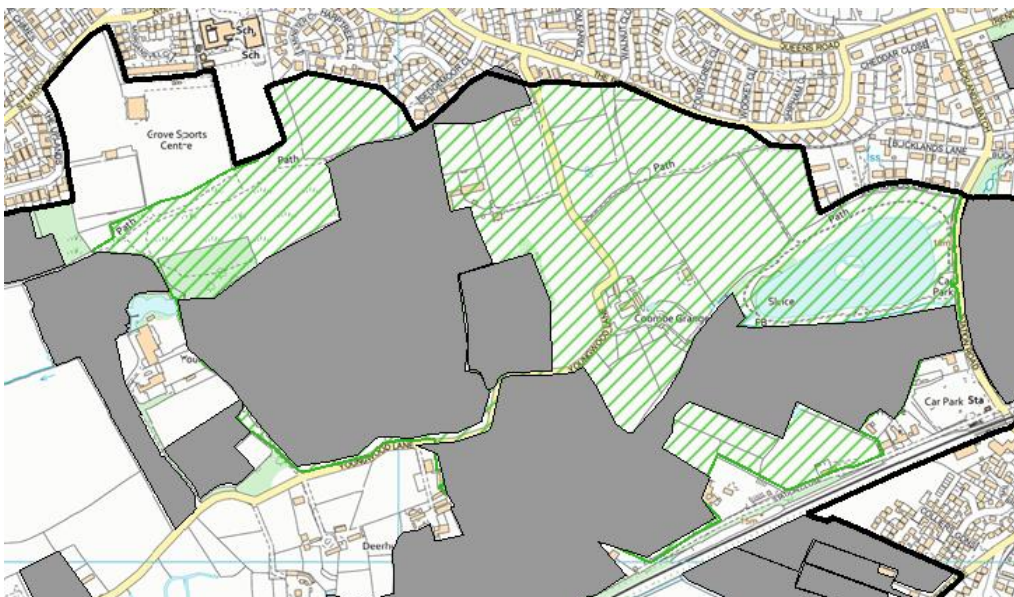
The existing Nailsea/Backwell strategic gap in the SAP (see Plan A1) requires one change in terms of planning consents granted: deletion of land to reflect planning consent for 14 dwellings at land at The Perrings on the north edge of the strategic gap, ref 20/P/0861/FUL.

Plan A1



A number of SHLAA sites near/within the Nailsea/Backwell strategic gap are shown in grey in Plan A2 below.

Plan A2



The SHLAA sites to the south and south west of Backwell Lake could potentially affect the strategic gap, but are largely Fluvial Flood Zone 3a, so are unlikely to be suitable for allocation for development. Therefore consideration of the scope for reducing the strategic gap has focussed on the SHLAA sites to the north west of Youngwood Lane, which are outside that flood zone.

1. Location of land in relation to the settlements

The existing strategic is logically drawn to follow settlement limits. However there is scope to redraw the strategic gap and the settlement limits, in the new local plan.

2. Sense of the gap

The existing strategic gap is widely drawn. There are fairly long range views from public footpaths and bridleways near the southern edge of Nailsea, north west of Youngwood Lane, towards Backwell, giving a sense of the gap. Significant reduction of the strategic gap to exclude the SHLAA sites north west of that lane, (effectively reducing it to land south east of Youngwood Lane), would be likely to affect those views.

However there would still be a sense of the gap. This is because there are places along Youngwood Lane, and also from public footpaths and bridleways east and south east of it, from which development at both Nailsea and Backwell are visible (intra-visibility). Such intra-visibility is also apparent from The Perrings (road) and the public open space adjoining it.

Therefore reduction of the strategic gap would be acceptable regarding this criterion.

3. Sense of leaving or arriving at a settlement

As with the existing strategic gap, with a reduced strategic gap to east and south east of Youngwood Lane there would still be a sense of leaving or arriving at a settlement, perceived from Station Road. This road runs between Nailsea and Backwell on the eastern edge of the gap, affording views of trees at the Backwell Lake area.

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

As with criterion 2 there is scope to significantly reduce the strategic gap, to east/south east of Youngwood Lane, yet still have perception of the separate identity of settlements.

Again this is because there are places along that lane, The Perrings, and also from public footpaths, across fields within the potential reduced strategic gap, from which development at both Nailsea and Backwell are visible (intra-visibility).

5. Landscape setting of the settlements

It would be possible to reduce the strategic gap to land east/south east of Youngwood Lane whilst still containing land which contributes to the landscape setting of the settlements. This notably includes the high-lying sloping public open space at The Perrings, and land at and around Backwell Lake.

6. Distance

As with the existing strategic gap, with a reduced one there would still be a relatively narrow section (under 200m) along Station Road, on the east boundary, between housing at Nailsea and housing perceived to be at Backwell, north of the station. This distance would not be affected.

7. Topography

As with the existing strategic gap with a reduced one the land would still generally slope down from the high-lying southern edge of Nailsea, at The Perrings, down to the flatter land north of the railway, including Backwell Lake.

8. Vegetation

As with the existing strategic gap with a reduced one the strategic gap would largely comprise pasture land subdivided by hedgerows. There are areas of trees in the vicinity of Backwell Lake.

9. Landscape character/type

The Council's adopted [Landscape Character Assessment SPD](#) (2018) identifies three LCAs in the vicinity of the existing strategic gap: K1 Nailsea Farmed Coal Measures, B1 Land Yeo and Kenn River Flood Plain, and J5 Land Yeo and Kenn Rolling Valley Farmland.

Most of the existing 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 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 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).

A reduced strategic gap east/south east of Youngwood Lane would still include parts of the three LCAs, but smaller areas. It would still help to protect elements of the LCAs referred to in the SPD within that smaller area, such as pastoral landscape, hedgerow trees, woodland and wetland.

10. Existing uses and density of buildings

The existing strategic gap's main land use is agricultural, with just three dwellings in the strategic gap, so at very low density. Backwell Lake is another feature.

A reduced strategic gap east/south east of Youngwood Lane would similarly be mostly agricultural with the lake, and potentially no dwellings within it. Outside but adjacent to the strategic gap there would be some dwellings, (including farmhouses), and the railway station with car park.

- 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)**

With the existing strategic gap there are places from which development at both settlements can be seen across the strategic gap (providing both intra and inter-visibility).

Some of these views would still remain with a reduced strategic gap east/south east of Youngwood Lane, and they are generally closer views. They include views looking

southwards from The Perrings at Nailsea (inter-visibility); from points along the bridleway south of The Perrings open space and along Youngwood Lane itself; and from the public footpath running from the railway line north west towards Youngwood House Farm; (all intra-visibility.)

Conclusion

This assessment suggests that reduction of the existing strategic gap to a smaller one east/south east of Youngwood Lane would potentially be appropriate, having regard to the criteria. This suggests it could potentially be achieved without significant harm to the purpose and objectives of strategic gaps.

However, Local Plan preparation has considered the potential for residential growth both to the south of Nailsea and west of Backwell, which prompted a review of the Green Belt boundary in this vicinity. It was felt that there was an opportunity to extend the Green Belt to secure the long-term protection of the area.

As a result the Local Plan proposes an extension to the Green Belt (in Policy SP7) which includes the area east/south east of Youngwood Lane considered appropriate for a reduced strategic gap. Residential development is proposed north-west of Youngwood Lane, (affecting part of the existing strategic gap.)

Given that strategic gaps and Green Belt should not overlap, the Local Plan does not propose to retain even a reduced strategic gap, so deletes the existing strategic gap between Nailsea and Backwell.

However the Local Plan includes a note that if the Green Belt is not extended as proposed, it is proposed that a revised strategic gap would be retained. This could potentially be the reduced strategic gap described above.

As a necessary consequence of the proposed extension of the Green Belt, it is considered that the deletion of the Nailsea/Backwell strategic gap is appropriate and justified.

B. Strategic gap between Weston and St Georges

This strategic gap is the only one in the SAP which is between parts of a settlement, because St Georges is part of Weston. It is not affected by planning consents or SHLAA sites.

However, as indicated above, it is now considered that strategic gaps should be between settlements, rather than parts of settlements.

Also there is little need for the land in this location to have a strategic gap designation. Most of the land within the existing strategic gap is protected as Local Green Space of recreational or landscape value, (cross hatched on Plan B1 below), under policy LP14 of the Local Plan. The rest, (single hatched) is school playing fields (to Priory Community School).

For these reasons it is considered that deletion of this strategic gap is appropriate and justified. This is reflected in the draft Local Plan.

Plan B1



C. Strategic gap between Weston and Uphill

This strategic gap is not affected by SHLAA sites. Review of this strategic gap has focussed on the question of whether it may not be appropriate at all, rather than whether it might be reduced as it is essentially a well-treed corridor along the A370.

Also new community development has taken place, notably a Health and Active Living Skills Centre at Weston College University campus site, for which planning consent was granted in 2018.

The Council has considered whether deletion of the strategic gap might be acceptable having regard to the 12 criteria for defining strategic gaps, as follows:

1: Location of land in relation to the settlements

The existing strategic gap in the SAP largely abuts the existing settlement limits of Weston and Uphill, except where those settlement limits exclude some developed land, notably at the hospital, which is likely to be perceived to be part of Uphill. The existing strategic gap excludes those buildings, but includes adjoining woodland, which is logical. See Plan C1 below.

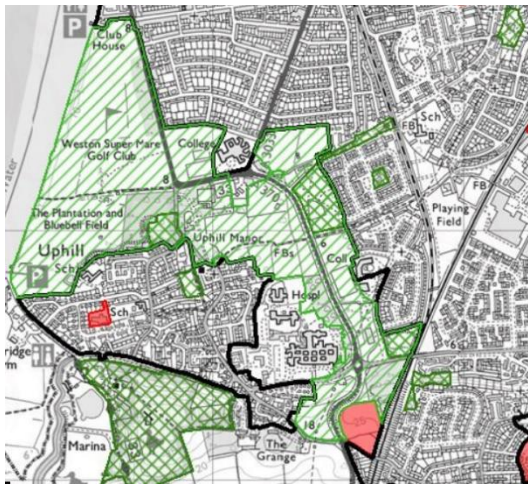
The settlement limits have been reviewed in preparing the new Local Plan (LP) and they are now proposed to include the previously excluded hospital buildings. (See Plan C2.) However this in itself would not affect the strategic gap.

On the east side of the A370 the LP proposes to move the settlement limits of Weston westwards to abut the A370, which does affect the existing strategic gap, (and would potentially imply its significant reduction if it were to be retained.) The proposed limits of the two settlements are being brought much closer together, only separated by the well-treed A370 corridor at one point, by the hospital. (See Plan C2).

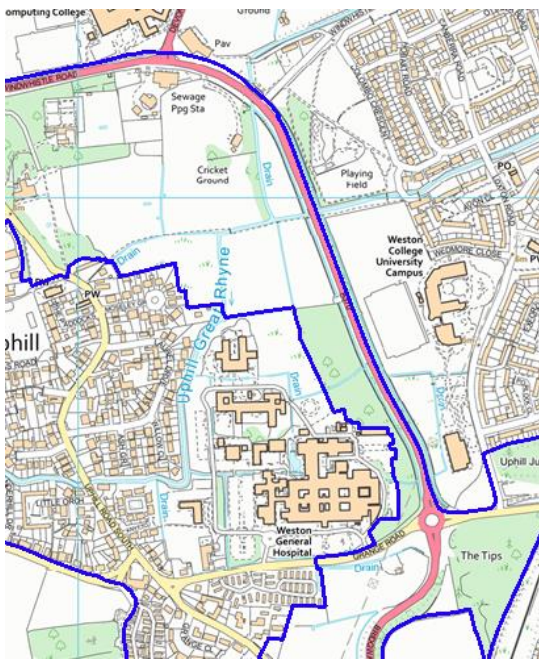
If a strategic gap was retained it would be very narrow at the point by the hospital. If the strategic gap was deleted, the well-treed A370 corridor would still be likely to remain as a corridor separating the settlements.

Overall it is considered that deletion of the strategic gap would be acceptable regarding this criterion.

Plan C1 Existing strategic gap (green hatched) with settlement limits (black) in SAP



Plan C2. Proposed new settlement limits (blue) in draft Local Plan.



2. Sense of the gap

There are relatively few places from which a sense of the gap between Uphill and Weston can be clearly perceived. This is largely due to the well-treed A370 corridor, with tall trees alongside the road largely obscuring views. There is a limited view of both settlements from the A370 south of Jubilee Park affording views west towards

Uphill (housing and St Nicholas' Church), and east towards housing at Weston. However there are few viewpoints conveying a strong sense of the gap.

Prior to building of the Health and Active Living Skills Centre there was a sense of the gap seen from the hospital roundabout at the A370/Grange Road/Broadway, but the new building within the strategic gap, on what was formerly green space, has reduced that.

The Weston super Mare golf course provides a sense of openness between Weston and Uphill, and so aids a sense of the gap.

The effect of and likely retention of the well-treed A370 corridor, and existence of the golf course means that loss of the strategic gap would not be highly detrimental with regard to this criterion.

3. Sense of leaving or arriving at a settlement

This sense is perhaps best obtained by walking a public footpath from near St Nicholas' Church at Uphill through to Weston near Jubilee Park, crossing the A370. It can also be obtained by travelling from Weston past the Weston super Mare golf course, southwards towards Uphill via Uphill Road South.

Without a strategic gap the countryside seen from the above public footpath could be eroded by development outside the settlement limits. This could affect the sense of leaving or arriving at the settlements to a degree, but not altogether, due to the well-treed A370 corridor seeming to represent a gap of a sort, particularly with the adjacent Jubilee Park, Weston, protected as Local Green Space.

Also the golf course helps to retain a sense of openness between Weston and Uphill and of travelling between the settlements.

Potential loss of the strategic gap would be slightly, but not highly, detrimental with regard to this criterion.

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

Loss of the strategic gap would increase risk of the undeveloped land between the settlements being reduced. However this may not increase perception of their proximity because there is already close proximity of the hospital and Health and Active Living Skills Centre across the A370, seen from the hospital roundabout. The proposed new settlement limits of Uphill and Weston in the Local Plan are close in this vicinity.

There are relatively limited places from which development at both Weston and Uphill is visible (intra-visibility) largely due to the well-treed A370 corridor. However the fact that such views exist, and they are limited, helps convey a sense that the settlements are separate places with separate identities.

Thus the effect of, and likely retention of, the well-treed A370 corridor would help to maintain this sense, even without a strategic gap.

The loss of the strategic gap would not be highly detrimental with regard to this criterion.

5. Landscape setting of the settlements

Much of the land in the existing strategic gap includes low lying pasture fields and playing fields either side of the A370, and Jubilee Park. These areas, being undeveloped, make some limited contribution to the landscape setting of the settlements. Loss of the strategic gap could increase development risk to the fields, although the playing fields would be likely to be covered by Policy SP52, and Jubilee Park is protected as Local Green Space.

However the fields are largely screened from the A370 by tall hedgerow trees. Also many are flat and not clearly visible from many public viewpoints, (except a public footpath near St Nicholas' Church), reducing their importance to the landscape setting of the settlements.

However the existing strategic gap includes more prominent land south of the hospital roundabout rising up above, and clearly visible from the A370, making a more significant contribution to landscape setting. That could be at greater risk if the strategic gap is removed, although the new Local Plan's Policy DP35 on landscape should help to reduce that risk, as it refers to protection of 'the character, sense of place, distinctiveness, and diversity of North Somerset's landscape and townscape'.

The sloping open grass land south of the hospital is particularly visible on this southern approach to the Weston area. Land on the east side of the A370 (The Tips) is also sloping and attractive, but is largely wooded and protected as local Wildlife Site.

Overall deletion of the strategic gap would be slightly detrimental with regard to this criterion.

6. Distance

The existing 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.

The distance between the proposed new settlement limits of Weston and Uphill is considerably less than that: down to under 30m in the vicinity of the hospital. However the A370 corridor is well treed at that point, with the wooded grounds to the hospital, and along the A370 itself, reducing the likelihood that the settlements will coalesce.

On balance it is considered that deletion of the strategic gap would be slightly detrimental regarding this criterion.

7. Topography

The topography of the land between the settlements is largely flat (fields, playing fields and golf course etc) with some higher land to the south.

Since topography is relevant to landscape, comments under criterion 5 on landscape are relevant here too, particularly regarding the sloping open grass land south of the hospital. Therefore, again, potential loss of the strategic gap would be slightly detrimental with regard to this criterion.

8. Vegetation

In the strategic gap there are some areas of woodland, notably alongside the A370 east and north of the hospital. This well-treed A370 corridor may be less vulnerable to development. (Draft Local Plan policy DP34 promotes retention, protection and enhancement of tree canopy cover.)

This wooded corridor, by limiting but not totally preventing intra-visibility, helps to retain sense of the separate identity of the settlements, and would be likely to do so even with loss of the strategic gap.

Further north there are large areas of woodland protected by Tree Preservation order (TPO) at Uphill, such as at The Plantation and the grounds to Uphill Manor, a listed building. These wooded areas contribute to the sense of the separate identity of Uphill from Weston.

Woodland at The Tips is protected as local Wildlife Site.

Thus wooded areas enjoy some degree of protection, and would be less likely to be significantly affected by loss of the strategic gap.

Deletion of the strategic gap would not be highly detrimental regarding this criterion.

9. Landscape character/type

The Council's [Landscape Character Area Supplementary Planning Guidance](#) (SPG) 2018 shows the strategic gap to mainly fall in the C1 Landscape Character Area (LCA), (Weston Bay Settled Coastal Edge). This is characterised by level lowland founded on Beach and Tidal Flats Deposits and localised Mercia Mudstone and River Terrace Deposits.

There is reference to “institutional large-scale buildings widely spaced and set in grounds or with expanses of parking” under “settlement character”. The hospital and university buildings at Uphill and Weston are logically examples of those.

The Landscape Guidelines include “minimise the impact of the urban edge and the encroachment of visually intrusive land uses through design guidance and appropriate land management”. Even with loss of the strategic gap it is likely that retention of the well-treed A370 corridor would help to minimise impact of the urban edge and visual intrusion of new development.

The higher land south of the hospital roundabout is within the G1 LCA (Mendip Ridges and Combes) characterised by ‘wooded steep slopes’ of which woodland at The Tips is a likely example. The Landscape Strategy includes conserving the “peaceful, rural landscape with its semi-natural and ancient woodlands”. Though not rural, conservation of the woodland at The Tips would potentially fit with the strategy.

While retention of the strategic gap would be compatible with such conservation, the wooded slope at The Tips is a wildlife site, protected under nature conservation policy. It is also likely to be protected under landscape policies, given the importance of wooded steep slopes in the G1 LCA.

For these reasons it is likely that some important elements of the Landscape Character Areas within the strategic gap would be protected anyway. Therefore loss of the strategic gap would not be highly detrimental regarding this criterion.

10. Existing uses and density of buildings

The existing strategic gap includes agricultural fields, Jubilee Park, golf course, Uphill Manor, two cricket grounds, school playing fields, woodlands and grounds to institutions such as the Weston College University Campus and hospital.

Buildings within the strategic gap are relatively few and mainly small (with the exception of the Health and Active Living Skills Centre), and at a low density.

A number of the relatively low density land uses are protected as community uses under Policy SP52, and some land is protected as Local Green Space or by TPO. Therefore it is not considered that loss of the strategic gap would be highly detrimental regarding this criterion.

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

Largely due to vegetation there is only very limited intervisibility across the strategic gap from the existing settlement limits of one settlement to another. Therefore loss of the strategic gap would not be highly detrimental regarding this criterion.

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)

As mentioned under criterion 2, intra-visibility is only evident from limited places such as from the A370 near Jubilee Park, from which development at both settlements is visible, but such views are largely restricted by the well-treed A370 corridor. It is likely that the well-treed corridor would remain. Therefore loss of the strategic gap would not be highly detrimental with regard to this criterion.

Conclusion

Loss of the Uphill/Weston strategic gap would not be highly detrimental with regard to any of the 12 criteria for designating strategic gaps, though it would be slightly detrimental for four of them: 3 (sense of leaving or arriving at a settlement), 5 (landscape setting of the settlements), 6 (distance) and 7 (topography).

With a number of the criteria the impact of the loss would be reduced because certain features in the strategic gap such as woodlands, playing fields, golf courses, public parks etc are protected by other policies or TPOs. In particular it is likely that the wooded A370 corridor would remain as a narrow corridor separating the settlements.

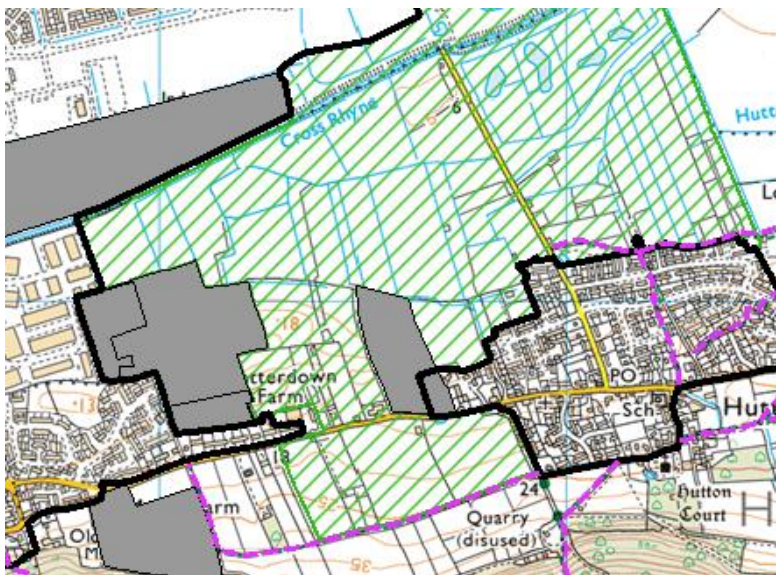
For these reasons it is considered that deletion of the strategic gap between Uphill and Weston is acceptable, and that is reflected in the draft Local Plan.

D: Strategic gap between Weston and Hutton

There are no planning consents affecting the existing strategic gap between these settlements. However there is a SHLAA site within it at Grange Farm on the western edge of Hutton on Plan D1.

That identified SHLAA site has been the focus of this strategic gap review, because the other SHLAA sites shown are outside the strategic gap, (and one at Oldmixon, on the eastern edge of Weston, has outline planning consent for housing).

Plan D1



1: Location of land in relation to the settlements

Currently, in the SAP, the strategic gap is drawn to abut the settlement limits of Hutton, shown in black on Plan D1. Those existing settlement limits include most of the Grange Farm complex (largely stone farm buildings in a farmyard), including the listed Grange farmhouse (white rendered) on the Oldmixon Road frontage. The farm complex adjoins residential properties to the east.

Further west, outside but adjoining the Hutton settlement limits, within the existing strategic gap, there are fields affected by the identified SHLAA site. (See photos 1-3 below). Redrawing the strategic gap to exclude the site would imply extending the Hutton settlement limits around it.

This would not be inappropriate in itself, as strategic gaps often, but not exclusively, follow settlement boundaries. The reduction of the strategic gap is acceptable regarding this criterion.

2: Sense of the gap

Fields within the identified SHLAA site, visible from Oldmixon Road, afford a view out into the existing strategic gap, with Weston visible in the distance, (see photo 2 below). This contributes to the sense of the strategic gap, and exclusion of the site from it, and its likely development as a result, would adversely affect that.

However there are other places where there are northward views of the countryside from the road within the strategic gap which would remain; see photos 5 and 6. These, together with southward views of countryside, would still help to maintain sense of the gap.

This sense would also be aided by the fact that there are tall hedgerow trees along parts of Oldmixon Road, including the north side along part of the frontage to the identified site. If retained these trees would still help convey some sense of a gap, including from longer distance views from a public footpath to the south within the AONB (see photo 4), although the sight of potential new development on the site would reduce that somewhat.

Overall the sense of the gap would not be significantly harmed. The reduction of the strategic gap is acceptable regarding this criterion.

It is also possible that if the SHLAA site was to be developed the Council could require the development to safeguard part of it fronting the road from built development. That could also help to retain the sense of the gap.

3. Sense of leaving or arriving at a settlement

There is currently a sense of travelling between the settlements of Weston and Hutton along the Oldmixon Road. This is partly due to views of the countryside on the south side of the road, but also due to gaps in frontage development on the north side of the road, affording views of countryside outlined above, within the strategic gap.

While exclusion of the identified site from the strategic gap, and its development would affect one of those gaps, others would remain, (see photos 5 and 6).

Part of the road frontage to the site is screened by tall hedgerow trees. If they were to be largely retained, and the identified site developed, there would still be a sense, to a degree, of travelling between settlements, by walking along a road partly fronted by countryside features such as hedgerows, views of countryside to the south, and the remaining views of countryside to the north.

Overall the sense of leaving or arriving at a settlement would not be significantly harmed. The reduction of the strategic gap is acceptable regarding this criterion.

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

Fields comprising the identified site contribute to perception of the separate identity of the settlements by being a visible part of the countryside on the edge of Hutton, with Weston visible beyond. This is apparent seen from Oldmixon Road and also from a public footpath south west of Hutton, in the AONB (see Photo 4).

However in the same photo it is apparent that tall hedgerow trees, including those in the hedgerow fronting part of the identified site, would, if retained, help to screen some of the likely development on the site, and contribute to perception of the sense of the gap between, and of the separate identity of, the settlements to some extent.

Overall perception of the separate identity of settlements would not be significantly harmed. The reduction of the strategic gap is acceptable regarding this criterion.

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

Seen from the site entrance on Oldmixon Road, buildings like the existing wooden shed on the identified site are not attractive (see Photos 2 and 3).

Part of the site comprising open fields to the rear, rising northwards, makes a limited contribution to the landscape setting of Hutton, being visible from the AONB footpath (see photo 4). However prominent vegetation, including tall hedgerow trees along part of the site frontage, does help to screen other parts of the site.

Overall the landscape setting of the settlements would not be significantly harmed by exclusion of the site from the strategic gap. It is acceptable regarding this criterion.

6. Distance

The existing strategic gap between Weston and Hutton is about 270m along the north side of Oldmixon Road. The identified site would reduce this to about 170m.

The reduction of the strategic gap is considered acceptable regarding this criterion.

7. Topography

The part of the strategic gap affected by the identified site is not of particularly remarkable topography, although there are fields rising northwards.

Reduction of the strategic gap here is acceptable regarding this criterion.

8. Vegetation

The identified site includes grass fields, and is bounded by a hedgerow to west, and taller hedgerow trees partway along the site's southern road frontage. If retained, the tall hedgerow trees would help to reduce visibility of development on the site from the road somewhat, (though it would still be visible from near the site entrance). The trees would similarly reduce its visibility, but only partly, from the AONB footpath.

Overall the reduction of the strategic gap is acceptable regarding this criterion.

9. Landscape character/type

Most of the land around Hutton, including the part of the strategic gap containing the identified site, is within the J2 River Rolling Valley Farmland Landscape Character Area (LCA) in the Council's [Landscape Character Assessment](#) SPD.

The SPD describes the LCA to be "*generally a peaceful pastoral landscape with intact hedgerows and hedgerow trees, a network of rural roads and scattered stone farmsteads, however the character has been considerably urbanised to the west particularly to the west of the M5. Village infill, ribbon development and non-agricultural land uses such as caravan sites are present. The overall strength of character is moderate but weak to the west of the M5*".

The landscape strategy for the LCA is to "*conserve the peaceful, rural nature of the landscape with intact pasture and field boundaries and to strengthen and enhance the area of weaker character particularly where the landscape is affected by modern development to the west of the M5*".

The identified site is west of the M5. However it is not in an area particularly strongly affected by modern development, being next to a farm with a listed farmhouse, although there are small employment premises immediately to the west.

Overall the reduction of the strategic gap is acceptable regarding this criterion.

10. Existing uses and density of buildings

The identified site in the strategic gap is currently in agricultural use. It comprises fields with just a few farm buildings, and so is a very low building density.

The main complex of Grange Farm with adjoining housing is within the existing Hutton settlement limits to the east, where the density of buildings is much greater,

The lower buildings density and greater openness of the agricultural land in the strategic gap would tend to support the existing strategic gap boundary.

The reduction of the strategic gap is not supported by this criterion.

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

The identified site adjoins the existing settlement limits of Hutton at Oldmixon Road, and from that point, near the site entrance, development at Weston is visible to the north, so there is inter-visibility across the site. This supports the inclusion of the site within the existing strategic gap.

The reduction of the strategic gap here is not supported by this criterion.

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)

Nearly at the same point, but further west so not adjoining the Hutton settlement limits, there is intra-visibility across the proposed allocation site. Again this supports the inclusion of the site within the existing strategic gap.

The identified reduction of the strategic gap here is not supported by this criterion.

Conclusion

The assessment finds that for nine of the 12 criteria (1-9 inclusive), reduction of the strategic gap to exclude the identified SHLAA site is acceptable. Those criteria include: location of land in relation to the settlements, sense of the gap, sense of leaving or arriving at a settlement, perception of the separate identity of settlements, landscape setting of the settlements, distance, topography, vegetation, and landscape character/type.

For the other three criteria (10, 11 and 12) the reduction of the strategic gap is not supported. They include existing uses and buildings, and inter and intra-visibility.

Since the reduction of the strategic gap is acceptable regarding the great majority of the criteria, it is considered appropriate. That is reflected in the draft Local Plan.

Photos for Weston/Hutton strategic gap

1. Grange Farm complex (rendered farmhouse and buildings to rear) located on edge of existing Hutton settlement limits. Field (part of identified SHLAA site) in existing strategic gap is to left. (View looking north from Oldmixon Road).



2. Nearby view of same field with wooden farm building visible



3. Looking further north west across the same field



4. View looking north west from footpath in AoNB. (Identified SHLAA site is arrowed).



5. Car business premises within Weston settlement limits, and treed area immediately to east in strategic gap, north of Oldmixon Road.



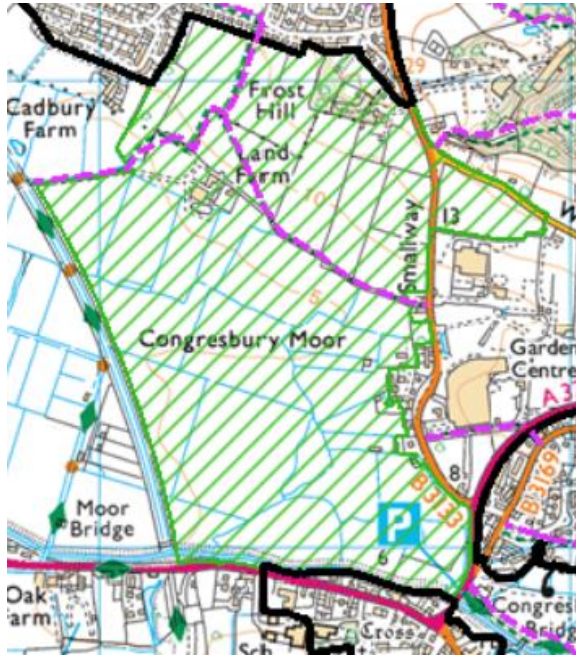
6. View north out into strategic gap between 145 and 147 Oldmixon Road.



E. Strategic gap between Congresbury and Yatton

The existing strategic gap is shown green hatched in Plan E1 below.

Plan E1

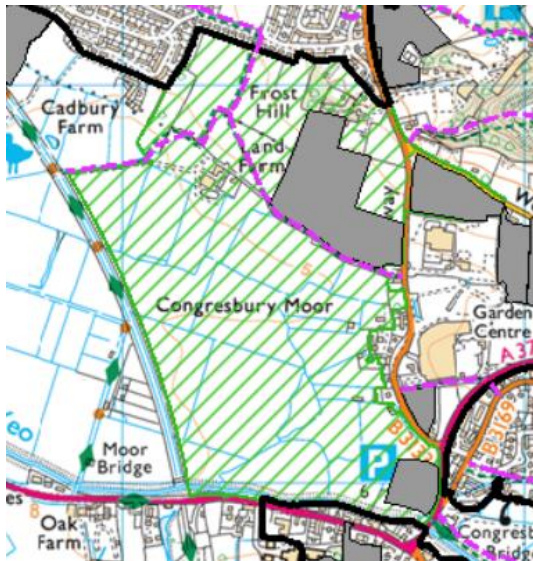


The strategic gap is not affected by planning consents. However there are SHLAA sites within and around it, as shown in Plan E2 below.

The SHLAA sites within the strategic gap are the large northern one east of Land Farm, the medium sized eastern, roughly triangular one at the intersection of the roads Smallway and Wood Hill, and the smallest, southern, roughly square one by Congresbury Bridge.

All three SHLAA sites are grass fields.

Plan E2



1. Location of land in relation to the settlements

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.

None of the three SHLAA sites actually adjoin the existing settlements' limits, although the eastern one adjoins the proposed settlement limits of Congresbury, which is now proposed to extend around Greenholm Nurseries.

All three SHLAA sites comprise pasture logically outside the settlement limits. Their exclusion from the strategic gap is not supported regarding this criterion.

2. Sense of the gap

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 (long range intra-visibility).

The sense can also be appreciated looking north-north-west from Congresbury Bridge over the River Yeo at Congresbury, with St Mary's Church at Yatton being visible across the strategic gap. This is another example of intra-visibility.

The identified northern SHLAA site adjoins the eastern part of the public footpath near Land Farm, and hence would affect the sense of the gap seen from there. Therefore reduction of the strategic gap to exclude this site would be detrimental,

(especially as it is not on the edge of the gap), although there would still be long range intra-visibility from points further west along the footpath, maintaining some sense of the gap.

Development of the southern SHLAA site would affect the view northwards to Yatton from Congresbury Bridge, and hence harm the sense of the gap seen from there.

The identified eastern SHLAA site by Wood Hill is very important to the sense of the gap, particularly when travelling between the settlements on the B3133, because it is part of the narrow stretch of the strategic gap between Yatton at Frost Hill and the garden centre at Greenholm Nurseries, which is likely to be perceived to be part of Congresbury.

Overall reduction of the strategic gap to exclude the SHLAA sites would be very detrimental regarding this criterion.

3. Sense of leaving or arriving at a settlement

This sense 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 likely to be perceived to be part of Congresbury).

Development of the northern and particularly the eastern SHLAA sites would alter this, so their exclusion from the strategic gap and development would be detrimental to the sense of leaving or arriving at a settlement.

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

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

Exclusion of the northern and eastern SHLAA sites would particularly affect perception of the separate identity of settlements or parts of settlements, and their perceived proximity, as indicated in criteria 2 and 3.

The northern and southern SHLAA sites would also have a detrimental impact by affecting intra-visibility of the settlements, which contributes to perception of separate identity.

Overall exclusion of the SHLAA sites from the strategic gap would be highly detrimental regarding this criterion.

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

There are attractive views across the strategic gap seen from the B3133, particularly views of the high-lying part up towards Yatton at Frost Hill, and also looking down towards the lower lying land to the south west across Congresbury Moor.

There are also attractive views of the River Congresbury Yeo and Congresbury Moor from the A370 at Congresbury Bridge.

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.

Exclusion from the strategic gap, and development, of all the identified SHLAA sites would be detrimental to this setting, particularly the largest northern one which affects the views looking westward from the B3133.

6. Distance

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, (likely to be perceived to be part of Congresbury).

Exclusion of the eastern SHLAA site from the strategic gap would further reduce this distance by about half, to roughly 140m. This would be detrimental regarding this criterion, although loss of the other SHLAA sites would have less significance for it.

7. Topography

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.

The largest northern SHLAA site is largely sloping and relatively high lying, and this topography partly aids its contribution to the landscape setting of the settlements, as indicated in criterion 5.

For this reason its exclusion from the strategic gap would also be detrimental regarding this criterion.

8. Vegetation

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.

Being pasture and of largely open character it considered that the three SHLAA sites are appropriate for retention in the strategic gap. Their exclusion from the strategic gap is not supported regarding this criterion.

9. Landscape character/type

The Council's [Landscape Character Area Supplementary Planning Guidance](#) 2018 indicates this strategic gap to be within the A1 Kingston Seymour and Puxton Moors LCA, characterised by lowland flat landform.

Retention of the three SHLAA sites within the strategic gap would be consistent with the landscape guidelines for the LCA which include conserving the remote pastoral character of the area, and maintaining open views to church towers and spires which form landmark features. The latter particularly applies to the southern SHLAA site.

Exclusion of the SHLAA sites from the strategic gap is not supported regarding this criterion.

10. Existing uses and density of buildings

The main land use in the strategic gap is agricultural, with farm buildings at Land Farm and one or two large dwellings (very low density) in extensive grounds at Frost Hill.

All three SHLAA sites are agricultural (pasture) and considered appropriate for retention in the strategic gap. Their exclusion from the strategic gap is not supported regarding this criterion.

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)

Within the strategic gap the Strawberry Line links with a public footpath (purple on Plan E2) running to the middle of the gap near Land Farm, from which development at both settlements can be seen (intra-visibility).

As mentioned, there is also intra-visibility from Congresbury Bridge.

Development of both the northern and southern SHLAA sites would affect these points of intra-visibility to varying extents, as indicated above. Their exclusion from the strategic gap is not supported regarding this criterion.

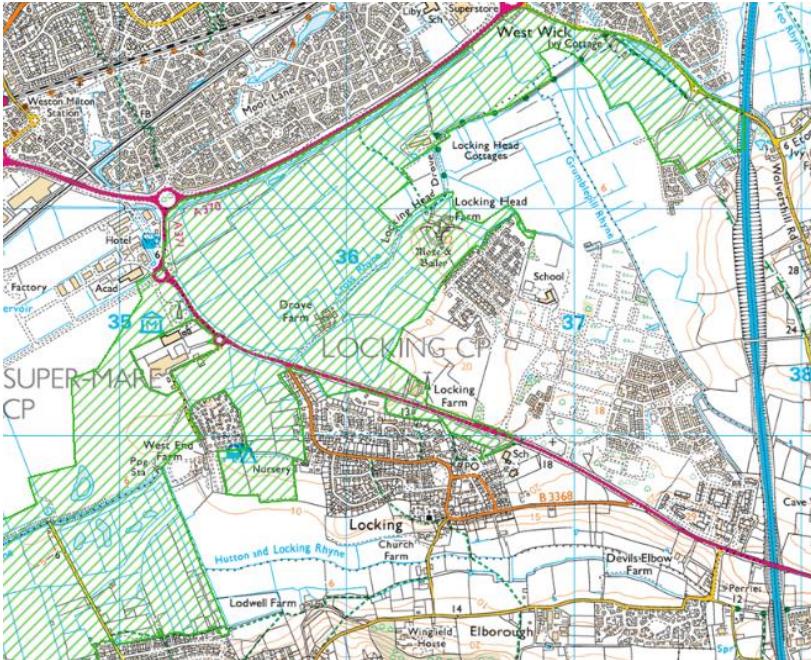
Conclusion:

Assessment, including consideration of the SHLAA sites within it, suggests that the strategic gap between Congresbury and Yatton should not be amended but remain unchanged.

F. Strategic gap between Weston- super- Mare, Locking and Parklands Village

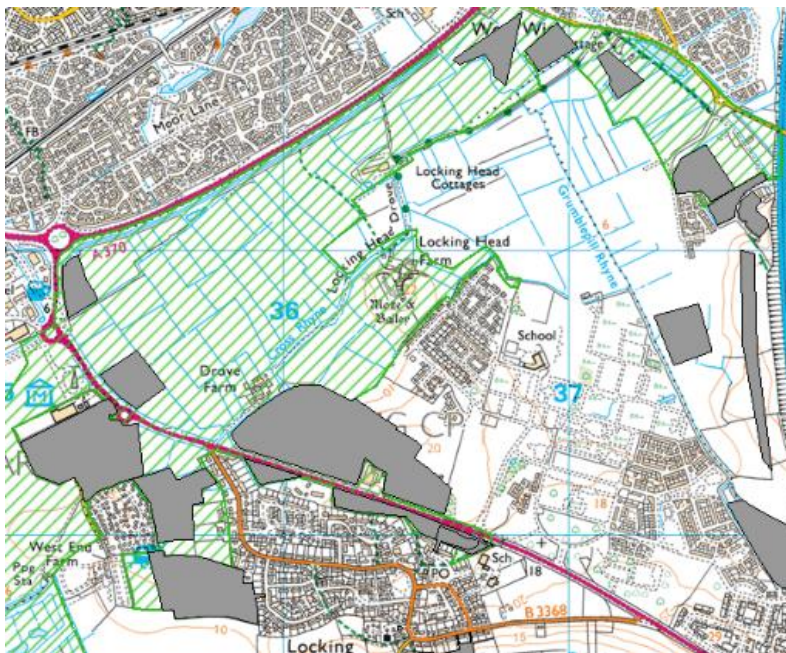
The existing strategic gap in the SAP is shown green hatched below

Plan F1.



There are SHLAA sites within and around it, as shown in Plan F2 below.

Plan F2



For the most part the Council has not seen a need to amend the strategic gap having regard to the SHLAA sites within it.

However one of the SHLAA sites was granted outline planning consent for residential development (8 chalet bungalows north of Leafy Way and Bartletts way, Locking) in 2018, and has since been developed. This has necessitated its exclusion from the strategic gap.

The strategic gap has also been refined as appropriate to reflect the detailed ongoing development at Parklands Village. Also there has been correction of any anomalies; the exclusion of the Locking Farm Industrial estate north of the A371 is an example.

1. Location of land in relation to the settlements

The existing strategic gap logically falls between the settlements of Weston (which includes Haywood Village), Locking and Parklands Village.

2. Sense of the gap

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, and also development at Weston across the strategic gap, to the north. This is an example of intra-visibility.

3. Sense of leaving or arriving at a settlement

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

South of here there are views of fields and then the largely green open areas in front of the helicopter museum and the adjacent buildings at Weston Business Park (an island of development in the strategic gap), and then more fields south to the first buildings (housing and petrol station) at Locking village.

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

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.

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

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

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.

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

6. Distance

The narrowest part of the strategic gap in terms of distance between settlement limits is between Parklands Village and Locking village. For instance only about 50m lies between land proposed for educational facilities at Parklands Village and Locking.

However, as indicated under criterion 4 above there are other narrow areas where the strategic gap is broken by areas of intervening development.

The fact that there are narrow areas emphasises the importance of the strategic gap for preventing coalescence of the settlements.

7. Topography

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

8. Vegetation

Vegetation includes hedgerows along field boundaries. However in the moors area north west of Locking rhynes alone separate some fields.

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

9. Landscape character/type

The Council's [Landscape Character Assessment](#) SPD 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).

The A4 land occupies most of the strategic gap. J2 is confined to a small area at the Motte and Bailey at Locking Head Farm, on the north west side of Parklands Village.

Protection of the strategic gap is consistent with the SPD regarding A4, which refers to the need to manage urban fringe development/activity to encourage a sensitive urban/rural interface.

The SPD indicates that west of the M5 and around Weston- super-Mare the transition between urban and rural is degraded. The strategic gap should help to prevent that getting worse.

10. Existing uses and density of buildings

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.

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)

There is inter-visibility between Weston and Locking village seen from the A371 near its junction with Elm Tree Road, close to Locking. There is intra-visibility further west along the A371.

Conclusion

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

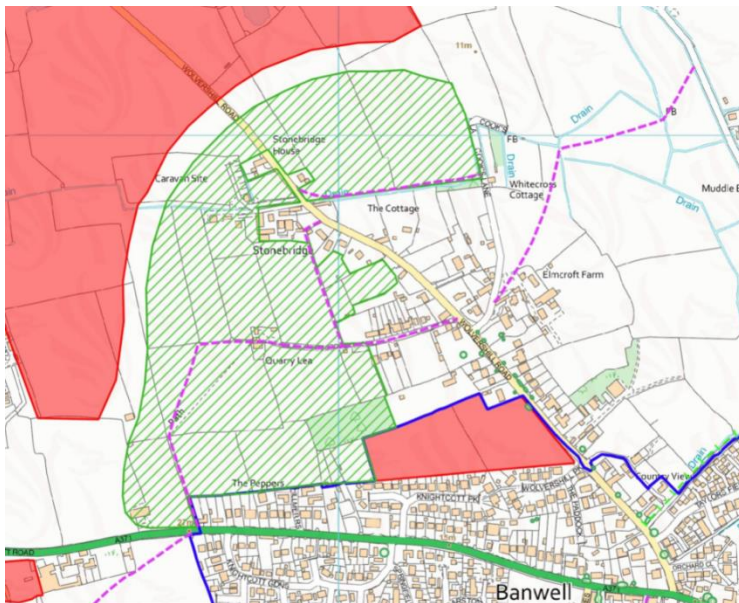
Further issue : New strategic gap between Banwell and Wolvershill

Policy LP1 of the new Local Plan proposes a new strategic growth location at Wolvershill (north of Banwell) to accommodate up to around 2,800 dwellings, around 11 ha of employment land, a mixed use local centre and primary schools. The proposed Banwell Bypass route runs generally to the south east of the proposed strategic growth location.

The strategic growth location is close to the settlement limits of Banwell (about 200m at the nearest point). In view of this, in drafting the Local Plan the Council considered that a strategic gap between Banwell and Wolvershill might be appropriate, to help to retain their separate identity, character and landscape setting. A strategic gap would also provide a form of buffer between the bypass and Banwell.

The Council felt that the strategic gap hatched green on Plan G1 below might be appropriate. The Wolvershill strategic growth location is the large pink area in the north west corner.

Plan G1



The council has assessed the appropriateness of the identified strategic gap, and its boundaries, with regard to the criteria for defining strategic gaps, as follows.

1: Location of land in relation to the settlements

The strategic gap is logically located between the existing village of Banwell and the proposed strategic development area at Wolvershill.

The southernmost boundary of the strategic gap is logically drawn to follow the proposed settlement boundary of Banwell in the new Local Plan (blue on Plan G1), which is similar to that defined in the adopted SAP except that it is drawn around a new proposed housing allocation west of Wolvershill Road; (the smaller area shown in pink).

The proposed settlement limits do not extend further north of that housing allocation, so there are a number of dwellings, straddling Wolvershill Road which are outside the Banwell settlement limits. However it is likely that they are perceived to be part of Banwell.

The eastern and northern inner boundaries of the strategic gap logically largely follow the curtilage of these dwellings, (and those on Whitecross Lane and Cook's Lane, which are short roads off Wolvershill Road). North of these dwellings are fields which are logically included in the strategic gap.

2. Sense of the gap

If the Wolvershill settlement was developed it is likely that there would be a sense of the gap looking north and south across fields (towards Wolvershill and Banwell) from a public footpath crossing the strategic gap.

The footpath runs from the A371 (Knightcott Road) near the settlement limits of Banwell, north west to the property Quarry Lea, and then east to Wolvershill Road via Whitecross Lane; (such Public Rights of Way are purple on Plan G1).

3. Sense of leaving or arriving at a settlement

It is likely that people travelling between Banwell and Wolvershill via Wolvershill Road would have a sense of leaving or arriving at a settlement, as there would be fields either side, north of housing straddling Wolvershill Road. (It is likely that that housing would be perceived to be part of Banwell, although the existing and proposed settlement limits are further south.)

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

It is anticipated that Wolvershill would be about 200m from the settlement limits of Banwell across the south west corner of the proposed strategic gap. The settlements would be likely to be perceived to be close, but separated by fields, seen from the public footpath crossing the strategic gap from Knightcott Road.

Wolvershill would be about 250m north of dwellings on the east side of Wolvershill Road which are outside Banwell's settlement limits, but likely to be perceived to be

part of Banwell. They would be separated by fields in the strategic gap, visible from a public footpath north of the dwellings.

Thus there is likely to be perception of the separate identity of the settlements.

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

Banwell has a fairly attractive landscape setting (particularly seen from the public footpath across the strategic gap) which the designation will help to protect.

The pasture fields within the strategic gap slope down gently southwards, flattening out near Whitecross Lane, then the land very gently begins to rise northwards again. Hedgerows are generally fairly low, affording views across the strategic gap.

6. Distance

The new settlement of Wolvershill is likely to be about 200m from the settlement limits of Banwell. Protection through the strategic gap would help to prevent this distance from narrowing, but the bypass is included in the 200m.

7. Topography

The topography of the strategic gap is indicated under criterion 5 on Landscape setting. The topography is not remarkable but the slight gradients are noticeable.

8. Vegetation

The strategic gap largely comprises pasture fields with generally fairly low hedgerows affording relatively good visibility across the area. However there are taller hedgerows and tree groups in the south east corner.

9. Landscape character/type

The strategic gap is within the western part of the J2: River Yeo Rolling Valley Farmland LCA (Landscape Character Area) in the Council's 2018 [Landscape Character Assessment](#). The LCA is described as "an extensive but interrupted area of undulating lowland running across the southern part of the district".

The landscape strategy for the LCA includes "to conserve the peaceful, rural nature of the landscape with intact pasture and field boundaries". The designation of the strategic gap is consistent with that.

10. Existing uses and density of buildings

There are very few buildings in the proposed strategic gap, mainly at farms such as Stonebridge Farm, where there is also a caravan storage area, and Quarry Lea. The density of buildings is very low.

The density of buildings (mainly dwellings) is higher outside the strategic gap along Wolvershill Road, reinforcing the logicity of the proposed strategic gap boundary.

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

If the Wolvershill settlement was to be developed there would be likely inter-visibility with Banwell, seen from the public footpath across the strategic gap where it adjoins the settlement limits of Banwell, near Knightcott Road.

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)

There would be likely intra-visibility from other places along the same public footpath between the settlement limits of Banwell and Quarry Lea.

Conclusion

The assessment suggests that the identified strategic gap between Banwell and Wolvershill and its boundaries, are appropriate and justified. That is reflected in the draft Local Plan.

Overall conclusion to review of strategic gaps

The review has concluded that the strategic gap concept remains fit for purpose and they remain a useful and effective policy tool.

The review of strategic gaps has found that the following changes to existing strategic gaps are appropriate:

- deletion of strategic gap between Nailsea and Backwell
- deletion of strategic gap between Weston and St Georges
- deletion of strategic gap between Weston super Mare and Uphill

- reduction of the strategic gap between Weston and Hutton
- designation of a new strategic gap north of Banwell

These changes are reflected in the Local Plan Preferred Options.

