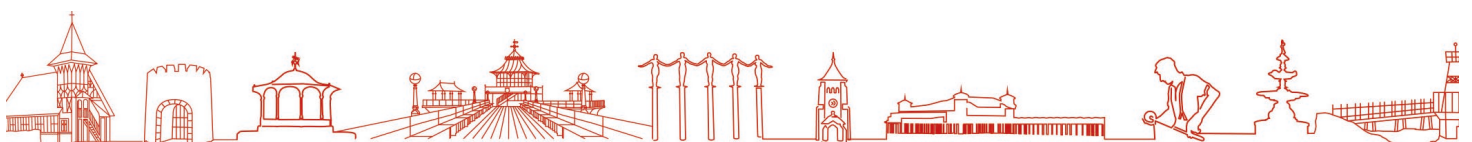




# North Somerset Local Plan 2039

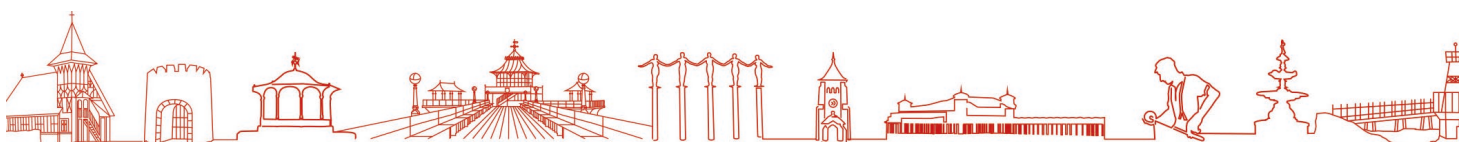
## Strategic gaps Background Paper

November 2023



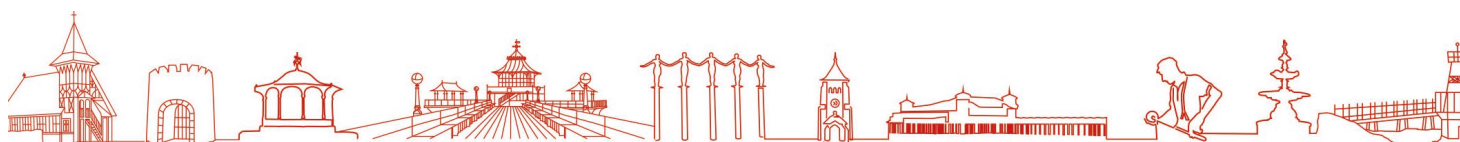
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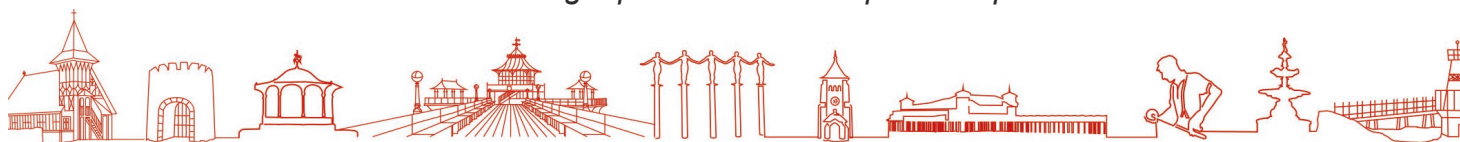
## 1. Introduction

- 1.1 This Background Paper identifies and addresses issues concerning strategic gaps which have emerged in preparing the Pre-submission (Regulation 19) version of the North Somerset Local Plan, including some raised in responses to public consultation on the Preferred Options (Reg 18) version of the plan.
- 1.2 The strategic gap designation was introduced in the adopted North Somerset Core Strategy and Site Allocations Plan (SAP). A review of strategic gaps was undertaken in preparing the Preferred Options (Reg 18) Plan, documented in a Background Paper (March 2022). That Background Paper was made public alongside the Reg 18 plan when it was subject to public consultation.
- 1.3 The March 2022 review concluded that the strategic gap designation remains appropriate and strategic gaps remain a useful policy tool. It found that the 12 criteria for defining strategic gaps were appropriate and that the following changes to strategic gaps should be made:
  - deletion of strategic gap between Nailsea and Backwell, due to proposed extension of Green Belt
  - deletion of strategic gap between Weston super Mare (Weston) and St Georges
  - deletion of strategic gap between Weston and Uphill
  - reduction of the strategic gap between Weston and Hutton
  - designation of a new strategic gap between Banwell and the proposed strategic location at Wolverhill.
- 1.4 These changes were reflected in the Preferred Options version of the Local Plan.
- 1.5 In response to public consultation on the Preferred Options, a number of responses concerning strategic gaps were received. While some still challenged the concept of the designation, it is considered that the points supporting it in the March 2022 Background Paper are robust, and are repeated below.



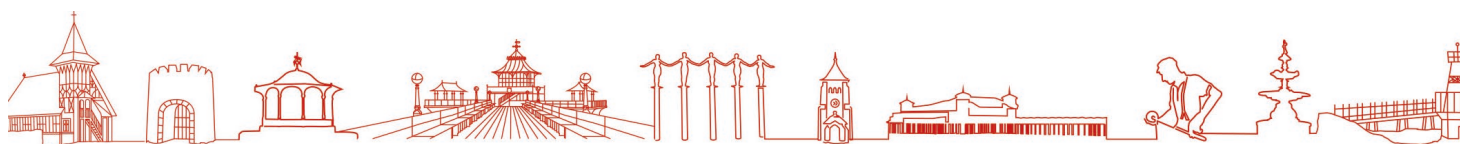
## 2. Justification for the strategic gap designation

- 2.1 Strategic gaps play an important role in maintaining the local character and distinctiveness of 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.
- 2.2 Strategic gaps provide a 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 countryside policies provide some control of development, 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.
- 2.3 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)'.
- 2.4 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.
- 2.5 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.
- 2.6 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*



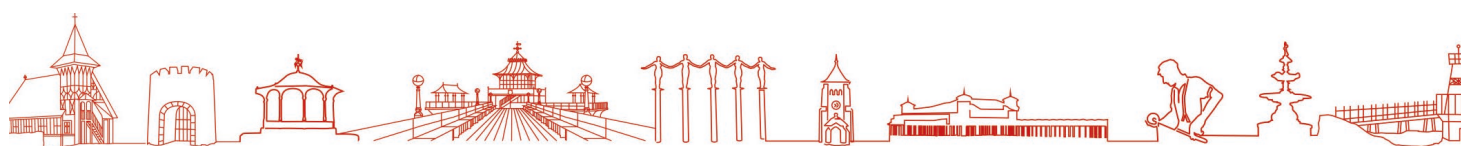
*of belonging and contributes to well-being, inclusion and community cohesion’; (paragraph 39 of NDG).*

- 2.7 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’; (paragraph 50 of the NDG).*
- 2.8 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.
- 2.9 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.
- 2.10 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.
- 2.11 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.
- 2.12 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. These include their 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. Some of these benefits are referred to in



the national Planning Practice Guidance (PPG) section on Natural Environment (para 006).

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



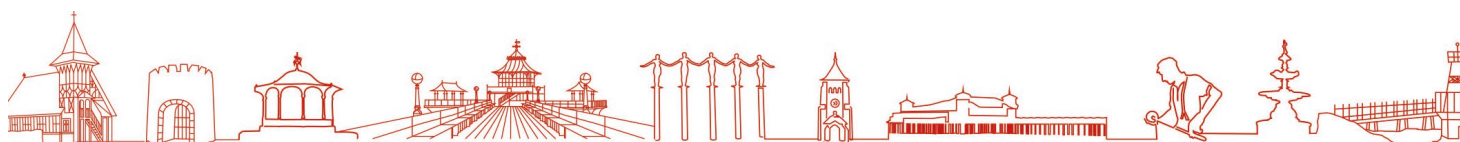
### 3. Factors for consideration in reviewing strategic gaps

3.1 The Strategic Gaps Background Paper (March 2022) used 12 well established criteria in the review of strategic gaps, (broadly similar to criteria used in defining strategic gaps in the SAP). The criteria are as follows:

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, actual and perceived proximity of the settlements
5. Landscape setting of the settlements
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)

3.2 These criteria are still considered to be robust. However, the council has subsequently felt that there is a need to add an initial statement, to also be considered in defining strategic gaps, as follows: *There is particularly likely to be a need for a strategic gap where there is development pressure, especially pressure leading towards potential coalescence of settlements, and particularly in terms of ribbon development along main roads. The need will be increased where there is unlikely to be a landscape reason for refusal.*

3.3 Therefore this statement will precede the 12 criteria in assessments concerning strategic gaps.





## 4. Consideration of suggestions for additional strategic gaps

4.1 Responses to the Preferred Options produced suggestions for strategic gaps at the following locations: Sandford/Churchill, Claverham/Cleeve, Clevedon/Kenn, Clevedon/Tickenham, Long Ashton/Yanley area and proposed development area at Woodspring golf club, Abbots Leigh/Pill including gaps along the line of A369, south of Locking, north of Elborough, east of Hutton and west of Elborough,

4.2 The Council's consideration of them is summarised as follows:

### **Sandford/Churchill:**

This area was considered worthy of closer examination for a possible strategic gap. There are a number of SHLAA sites between the settlements, and other relatively narrow gaps between groups of dwellings along the A368 and Churchill Green, development of which would potentially exacerbate ribbon development along those roads and potentially lead towards coalescence of the settlements. (Therefore detailed consideration of a possible Sandford/Churchill strategic gap is provided below).

### **Claverham/Cleeve:**

A strategic gap is not appropriate as the land between the settlements is Green Belt with broadly similar functions to strategic gaps.

### **Clevedon/Kenn:**

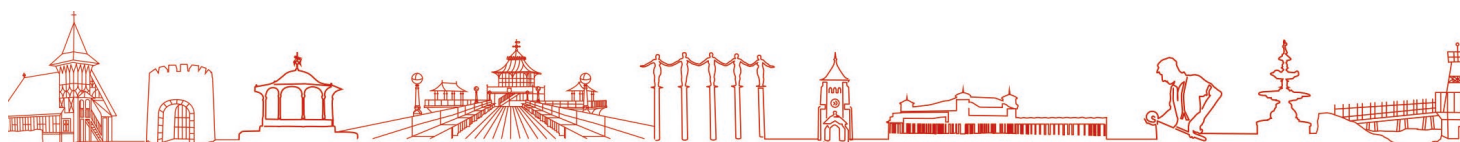
A strategic gap is not appropriate. The M5 lies between the settlements. Also SHLAA sites received suggest that there is little pressure for development on the land south east of the M5.

### **Clevedon/Tickenham:**

A strategic gap is not appropriate as the land between the settlements is Green Belt with broadly similar functions.

### **Long Ashton/Yanley area and proposed development at Woodspring golf club Yanley area:**

A strategic gap is not appropriate as this area is Green Belt with broadly similar functions. Also strategic development at the golf club is no longer being proposed.





**Abbots Leigh/Pill including gaps along the line of A369:**

A strategic gap is not appropriate as this area is Green Belt with broadly similar functions.

**South of Locking, north of Elborough:**

A strategic gap is not appropriate as Elborough is not a settlement with a defined settlement boundary.

**East of Hutton and west of Elborough:**

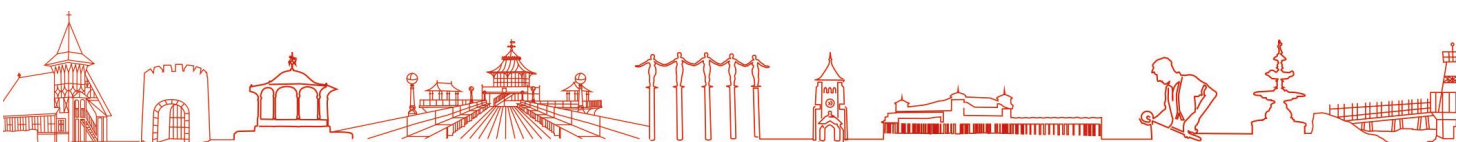
A strategic gap is not appropriate as Elborough is not a settlement with a defined settlement boundary.

**East of Elborough and west of Banwell:**

A strategic gap is not appropriate as Elborough is not a settlement with a defined settlement boundary. There are no existing settlements with a defined settlement boundary west of Banwell, east of the M5. There is a proposed strategic location, (Wolvershill), but there is a strategic gap already proposed between it and Banwell.

**Bleadon/Weston super Mare**

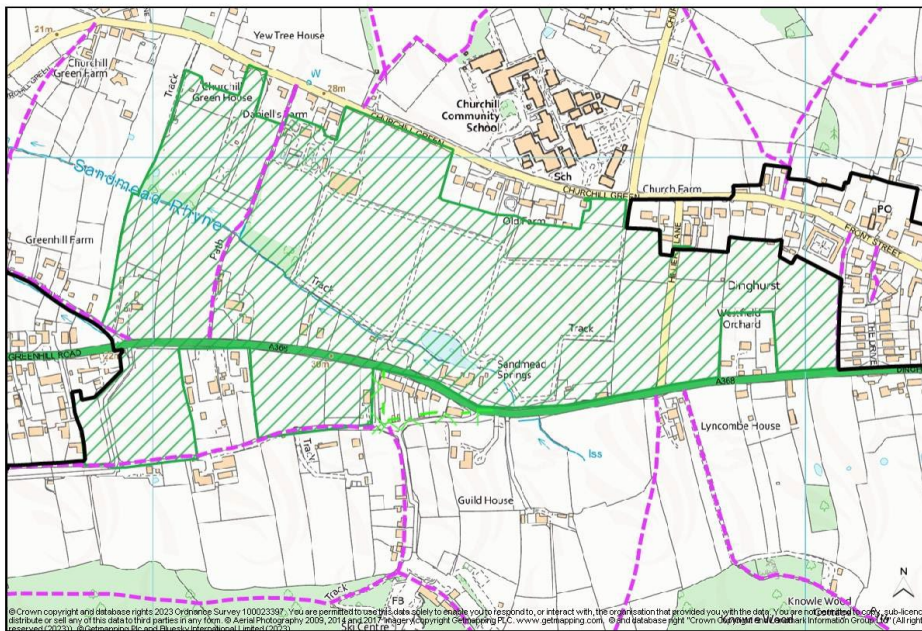
A strategic gap is not appropriate. Having regard to SHLAA sites received and taking account of the generally relatively steeply sloping terrain between the settlements, it is considered that there is not likely to be development pressure leading towards potential coalescence of the settlements. Also, the relatively sensitive nature of the landscape, taking account of the topography and views, would suggest that if significant development was proposed there could well be a landscape reason for refusal.



## 5. Detailed consideration of a possible new Sandford/Churchill strategic gap

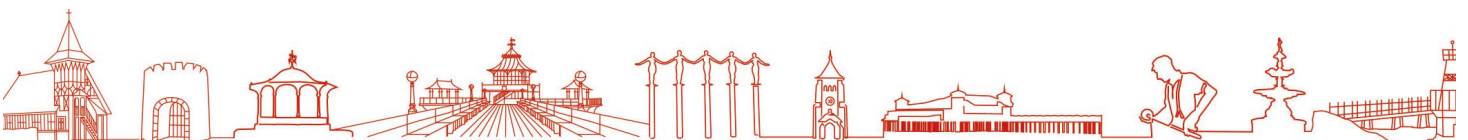
- 5.1 As a basis for consideration, officers suggested the strategic gap shown on Plan SC1 below, and assessed it regarding the initial statement on strategic gaps, and the 12 criteria.

Plan SC1 Suggested strategic gap (green hatched)

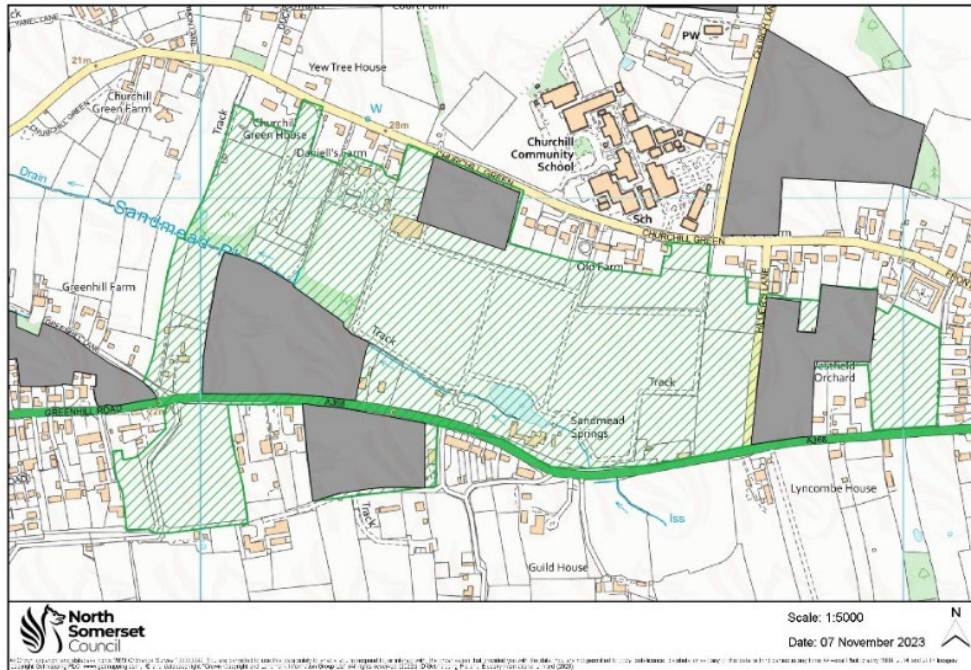


### Assessment against initial statement

- 5.2 The statement reads: *There is particularly likely to be a need for a strategic gap where there is development pressure, especially pressure leading towards potential coalescence of settlements, and particularly in terms of ribbon development along main roads. The need will be increased where there is unlikely to be a landscape reason for refusal.*
- 5.3 The statement supports identification of a strategic gap. A number of SHLAA sites lie between the settlements, showing development pressure ; (see plan SC2 below.)
- 5.4 Relatively narrow gaps between groups of frontage dwellings lie along the A368 and Churchill Green, development of which would potentially exacerbate ribbon development along those roads and potentially lead towards coalescence of the settlements.



Plan SC2 with SHLAA sites in grey:



## Assessment against the 12 criteria

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

The proposed strategic gap logically falls between the proposed settlement limits of Sandford and Churchill, between 86 Greenhill Road (A368) at Sandford, and The Drive at Churchill (Dinghurst part).

### 2. Sense of the gap

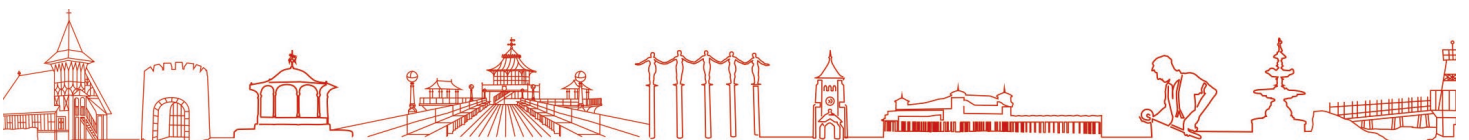
There is a sense of the gap gained when leaving Sandford along the A368 and encountering fields either side of the road between Sandford and The Drive, Churchill. This sense exists despite the fact that there are some intervening groups of dwellings along that road between the settlements.

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

There is a sense of leaving Sandford when travelling east along the A368 Greenhill Road, when one initially encounters fields on both sides of the road.

Although there are groups of dwellings further east, on both sides of the A368, these are relatively small groups in the countryside, and do not remove the sense that one has left Sandford.

It is not until one reaches The Drive (a cul de sac off the A368) that there is likely to be a strong sense of arriving at Churchill, since from that point





eastwards there is a relatively long continuously developed road frontage along the A368 at Dinghurst, Churchill. This supports the proposed strategic gap boundary.

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

Perception of the separate identity of the settlements and their proximity is gained when travelling between them, but also from looking at a map on which the settlement limits and proposed strategic gap are shown. The extent of the strategic gap, and the risk of the settlements joining if intervening fields, and particularly gaps between groups of dwellings along the roads, are developed, can be clearly perceived.

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

There are attractive views from the A368 into countryside in the strategic gap, although these are not constant, being interrupted by the groups of dwellings referred to above. However, some of the views allow appreciation of the topography, with the land gently falling down from the A368 and Churchill Green towards the Sandmead Rhyne.

There are also views of fields and hedgerows from Hillier's Lane, and from a public footpath (PROW) across the strategic gap west of the property Brookside on the A368. PROW are shown as purple dotted lines on Plan SC1 above.

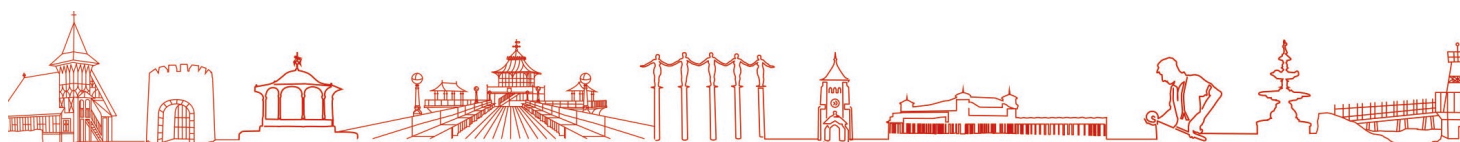
#### **6. Distance**

The shortest crow fly distance between the nearest parts of the settlements' limits across the strategic gap is about 795m diagonally from the dwelling at 86 Greenhill Road to Ilex House on Churchill Green. However there are only relatively narrow gaps between dwellings or groups of dwellings along the A368 and Churchill Green, such as that between Brookside and Nanarth at about 73m. Such narrow gaps emphasise the risk of exacerbating ribbon development along the roads and tendency towards coalescence of the settlements.

#### **7. Topography**

The topography of the strategic gap is relatively flat towards the east, visible from the A368 west of The Drive, and from Hilliers Lane, for example. The land on the west side of the gap has shallow gradients descending gently inwards from north and south towards the Sandmead Rhyne.

The topography means that development near the north side of the strategic gap at Churchill Green is visible across fields from certain places on the A368.



The fact that the topography, combined with low vegetation in places, permits views into/across the strategic gap contributes to the sense of the gap, and perception of the separate identity of the settlements.

## 8. Vegetation

There are hedgerows bordering the A368, some low enough to afford views of the fields in the strategic gap to the north, although such viewpoints are reduced in number by the groups of dwellings.

However boundary hedgerows, combined with frontage development, sometimes restrict views into the strategic gap, such as in places looking southwards from Churchill Green.

Not all field boundaries include vegetation. For example, there is little vegetation bordering Hilliers Lane to the west; that boundary largely comprises a low post and rail fence, affording views into the strategic gap, but hedgerows are taller on the east side. The field west of housing at The Drive, Churchill is clearly visible from the A368 over a low stone wall, with development at Front Street, Churchill also being visible, across the strategic gap.

The fact that the low vegetation in places permits views into/across the strategic gap contributes to the sense of the gap, and perception of the separate identity of the settlements.

## 9. Landscape character/type

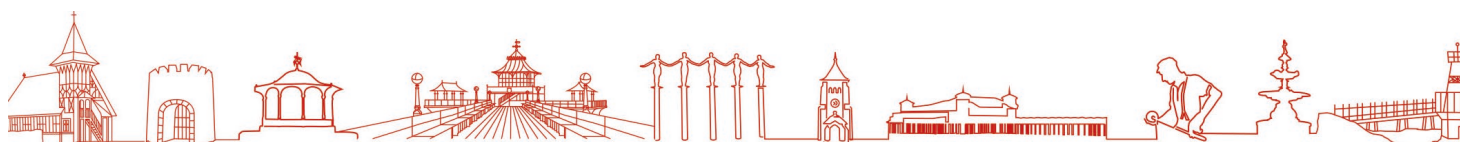
The Council's Landscape Character Assessment SPD shows the proposed strategic gap to be entirely within the J2 River Yeo Rolling Valley Farmland Landscape Character Area (LCA). The SPD states that one of the forces for change in the LCA is 'ubiquitous development along roads particularly the A371 and A368 and as infill of historic villages'. The presence of such development is evident from the groups of dwellings along the A368, as referred to above.

The landscape strategy for the LCA is 'to conserve the peaceful, rural nature of the landscape with intact pasture and field boundaries'. Protection of the strategic gap, which largely comprises agricultural land, is consistent with that.

## 10. Existing uses and density of buildings

The main land use in the strategic gap is agricultural grass fields. That is appropriate for a strategic gap.

The strategic gap itself includes only a few dwellings at low density. An example of their density is a group of two dwellings (Nanarth and Cross Gates) at about 5 dwellings per ha, north of the A368. The density of nearby development outside but adjoining the strategic gap, such as a group of 6 dwellings on the west side of The Drive, is higher, but still low, at about 15 dwellings per ha.



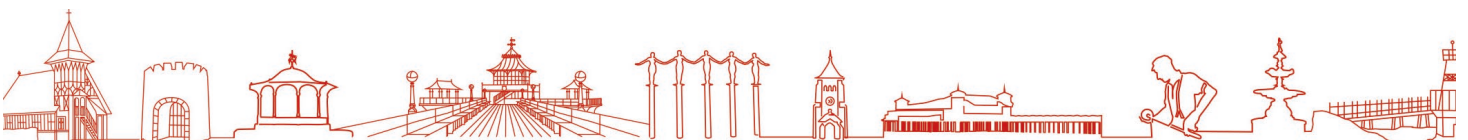
**11. Inter-visibility** (including ability to (1) see the edge of one settlement from the other, and (2) see development at one settlement from the other; and

**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)

It is difficult when looking from public viewpoints (roads or PROW) on the edge of one of the settlements across the strategic gap to see development within the settlement limits of the other settlement. Therefore there is little, if any, inter-visibility. The same applies when trying to see development within both settlements from a public viewpoint within the gap (intra-visibility). This is largely because of intervening vegetation and/or some development blocking views. Therefore criteria 11 and 12 provide little support for the strategic gap.

### Conclusion

5.5 This assessment suggests overall, against the initial statement and most of the 12 criteria, (particularly 1-4 and 6), strategic gap designation shown in Plan SC1 is appropriate.

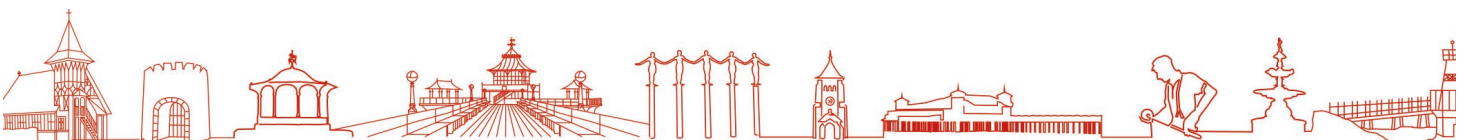


## 6. Strategic gap issues identified through the Preferred Options (Reg 18) consultation

6.1 In preparing the Pre-submission (Reg 19) Local Plan the council has considered comments received through the Preferred Options consultation. There were limited objections to the Congresbury/Yatton Strategic Gap so no further analysis of that gap is required. However there were some issues raised for the strategic gap between **Weston super Mare (Weston), Locking and Hutton**, including objections to inclusion of SHLAA sites within it. Subsequent to the public consultation the council also received comments on the extent of the **Wolvershill/Banwell** strategic gap. The comments raised are considered below.

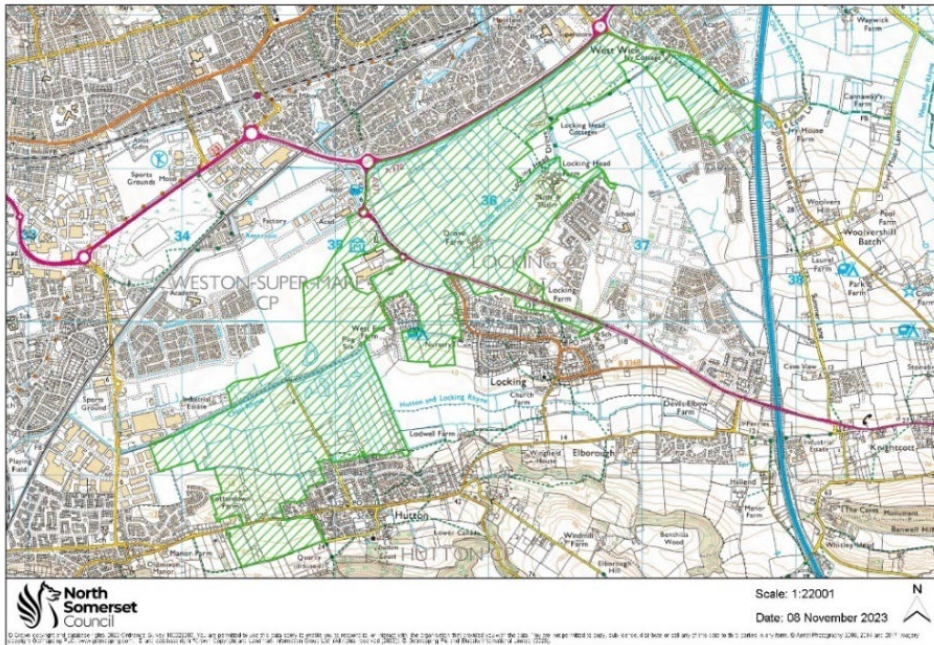
### Strategic gap between Weston-super-Mare, Locking and Hutton

- 6.2 This is a large strategic gap and needs to be split up for purposes of detailed review. However consideration against the initial statement on strategic gaps is possible.
- 6.3 The statement reads: *There is particularly likely to be a need for a strategic gap where there is development pressure, especially pressure leading towards potential coalescence of settlements, and particularly in terms of ribbon development along main roads. The need will be increased where there is unlikely to be a landscape reason for refusal.*
- 6.4 The full strategic gap as defined in the adopted SAP is shown (green hatched) in plan WLH1 below.



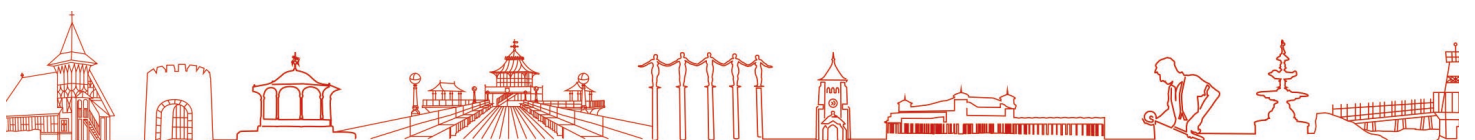
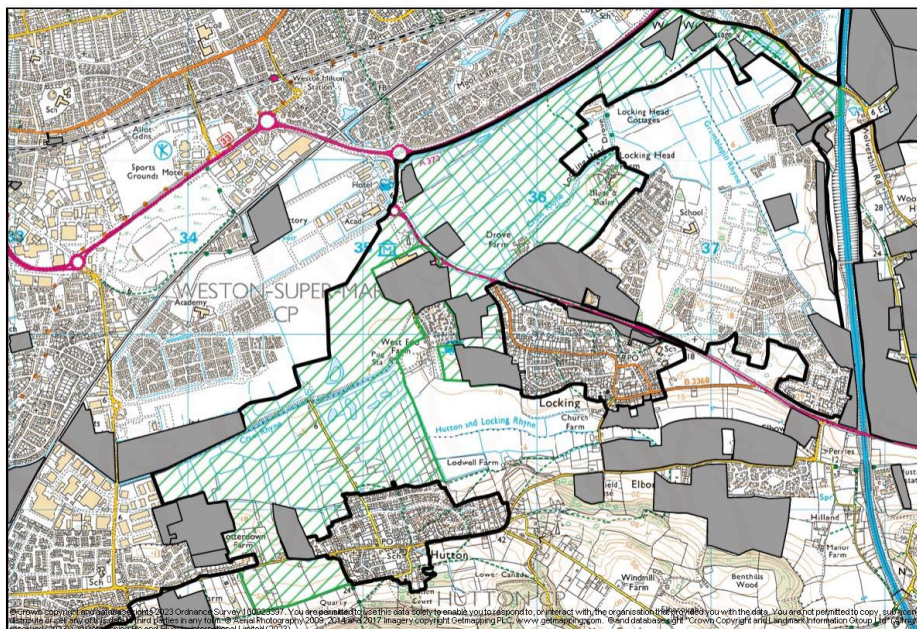


Plan WLH1:



6.5 SHLAA sites (grey) affecting the strategic gap can be seen in plan WLH 2 below.

Plan WLH 2:



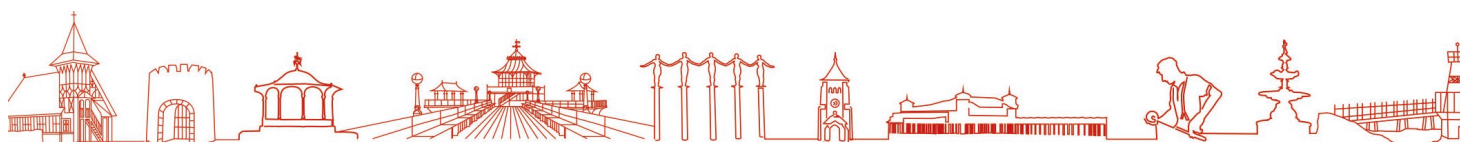
- 6.6 There are SHLAA sites pointing to development pressure, including some linear ones fronting major roads like the A371. However, there is a greater number of block shaped SHLAA sites, not all of which front main roads. Therefore, the initial statement provides some justification for the strategic gap but mainly regarding development pressure in general.

### **Approach to detailed review of the Weston, Locking, Hutton strategic gap**

- 6.7 Because this strategic gap is extensive detailed review has focused on the different parts where issues have been encountered, one of which is that between Weston and Hutton.

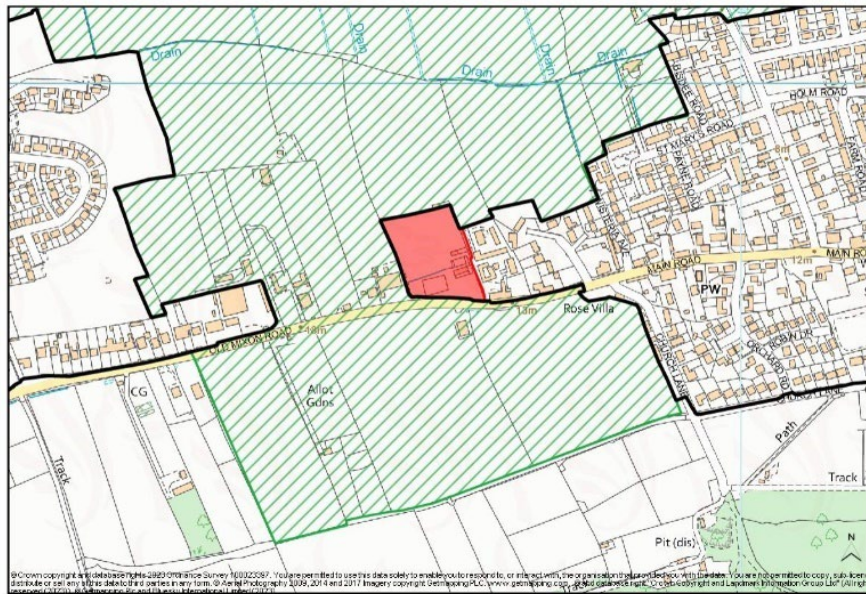
### **Part of the strategic gap between Weston and Hutton**

- 6.8 This area was reviewed in the [Strategic Gap Background Paper \(March 2022\)](#). That review concluded that reduction of the strategic gap to exclude a SHLAA site at Grange Farm on the western edge of Hutton would be acceptable, having regard to the 12 criteria for defining strategic gaps. The strategic gap was therefore reduced, and land at Grange Farm allocated for housing, in the Preferred Options (Reg 18 Local Plan.)
- 6.9 However since then the council has considered factors such as flood risk taking account of climate change and decided that the Grange Farm housing allocation should be reduced to exclude land subject to flood risk. Given its location it is appropriate for that land to be logically returned to the strategic gap, and that is proposed in the Pre-submission (Reg 19) Local Plan. The resulting proposed strategic gap between Weston and Hutton, with the reduced housing allocation in red, is shown in Plan WLH3 below.



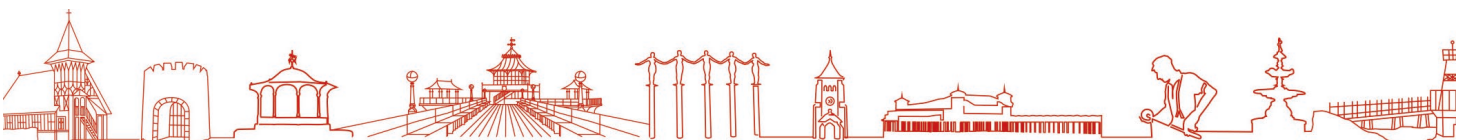


Plan WLH3:

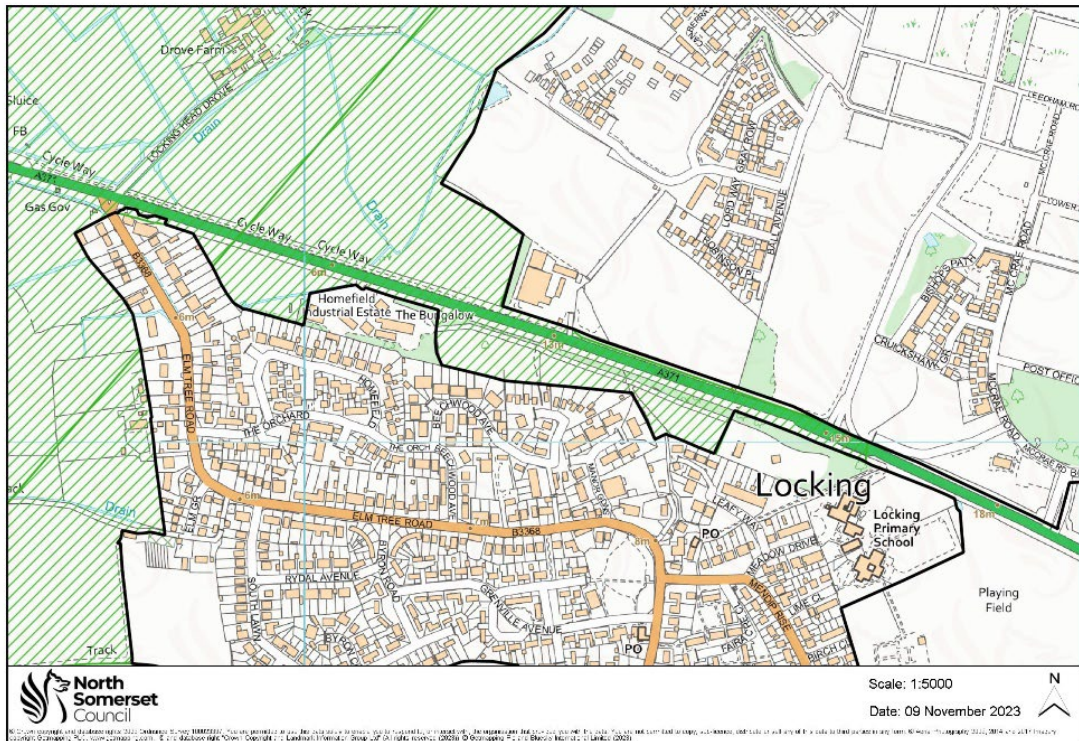


### Part of the strategic gap in the A371 corridor area between Locking and Parklands Village

- 6.10 The council received objections to inclusion of some SHLAA sites in this part of the strategic gap.
- 6.11 It is important to note that the strategic gap in this area changed slightly from that in the adopted SAP, to a new version proposed in the Preferred Options plan, as documented in the [Strategic Gaps Background Paper \(March 2022\)](#). This was partly to reflect an allowed appeal north of Leafy Way, referred to below, but also to reflect the detailed ongoing development at Parklands Village, and to correct any anomalies, such as excluding the Locking Farm Industrial estate north of the A371 from the strategic gap.
- 6.12 The resulting Reg 18 strategic gap in the A371 corridor is shown in Plan WLH 4 (green hatched):



Plan WLH4:

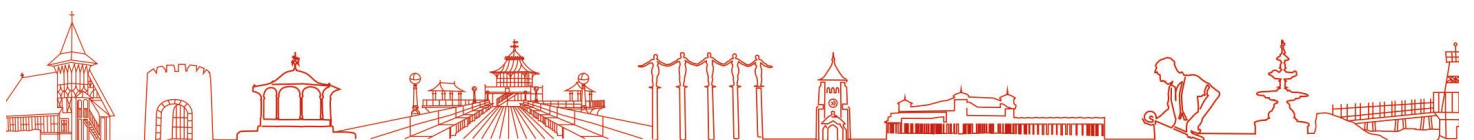


6.13 SHLAA sites A, B and C (coloured orange, blue and purple on plan WLH5 below) have been considered in reviewing this part of the strategic gap, taking account of sites which were subject to objections at Preferred Options stage, and sites close to them. The sites are:

A - a small triangle of land, orange hatched, west of Homefield Industrial Estate, south of the A371 at Locking;

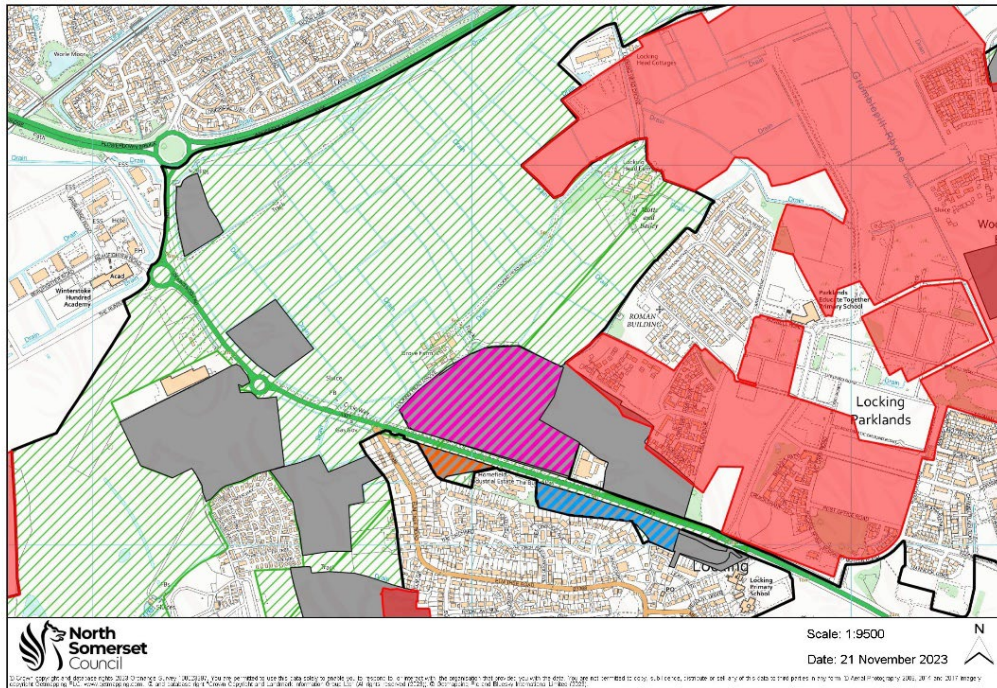
B - a long thin site blue hatched, to the east of that industrial estate, adjoining land granted outline planning consent for residential development (8 chalet bungalows north of Leafy Way and Bartletts way, Locking) in 2018. (The bungalows were permitted on appeal, (application ref 17/P/5572/OUT) and the strategic gap amended accordingly in the Preferred Options plan.)

C - land purple hatched, north of the A371 by Drove Farm.





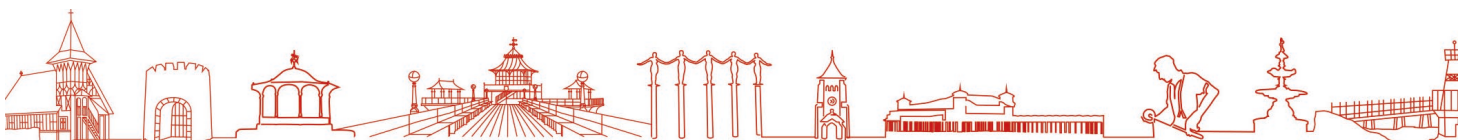
Plan WLH5:



6.14 The council has considered these three SHLAA sites below, taking account of the initial statement and 12 criteria to be considered in defining strategic gaps.

#### Consideration against initial statement on strategic gaps

- 6.15 The statement reads: *There is particularly likely to be a need for a strategic gap where there is development pressure, especially pressure leading towards potential coalescence of settlements, and particularly in terms of ribbon development along main roads. The need will be increased where there is unlikely to be a landscape reason for refusal.*
- 6.16 Since A, B and C are all SHLAA sites there is clearly development pressure, and along a main road, the A371. Also one of the sites, B, is linear, and its development could arguably cause ribbon development between the housing allowed on appeal, to the east, and Homefield industrial estate. Site A also fronts the road further west.
- 6.17 However west of site A there is existing development at Locking fronting the road, so loss of sites A and B to development would not exacerbate risk of coalescence between Locking and Weston along the A371.
- 6.18 There would be loss of land from the strategic gap, and narrowing of it. However the A371 itself provides a barrier of a sort between Locking



and Parklands Village, and there is a relatively well vegetated corridor with strong vegetated buffers on both sides of the road, east of site C, and a relatively strong vegetated buffer on the south side of the road against sites A and B. Retention of the vegetated buffers, with the road itself, would help to give a sense of a gap between Locking and Parklands Village, even with development of sites A and B.

- 6.19 However Site C is more open to the road, lacking such a well-vegetated buffer, and being larger it would cause greater loss of strategic gap in an area between Parklands Village and Weston, Locking and Parklands Village, and Locking and Weston.
- 6.20 It is difficult to predict whether a landscape reason for refusal of applications might be likely with the sites. However it would seem to be more likely with site C than A or B because it is larger, more open and less well screened.
- 6.21 Therefore the initial statement on strategic gaps mainly supports retaining site C in the strategic gap regarding its characteristics and location. It is less relevant for A and B, although, like C they do point to development pressure.

#### Assessment against the 12 criteria:

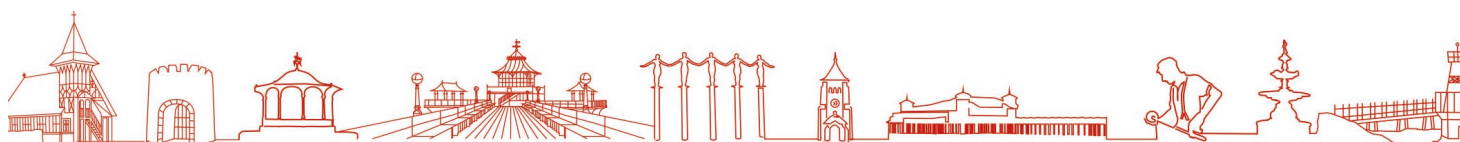
### **1. Location of land in relation to the settlements**

Sites A, B and C all occupy land in the existing strategic gap between Weston (which includes Haywood Village), Locking and/or Parklands Village. This is a factor in favour of keeping them in the strategic gap, and based purely on that criterion their exclusion from the strategic gap would be a moderate disadvantage.

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

Site C makes a significant contribution to the sense of the gap, being relatively open to view from the A371, notably near Locking petrol station, from where development at Locking, Weston and Parklands Village are all visible in the vicinity of the site (intra-visibility). Development of C would be a major disadvantage in this respect.

Sites A and B make less of a contribution to sense of the gap because they are much more screened from the A371 by vegetation, (particularly B, with a tall dense tree barrier along the road.) Loss of land to development behind the frontage vegetation on these sites would therefore not have a significant disadvantage regarding this criterion, if the vegetation is retained. The vegetation provides a green corridor along the road contributing to a sense of separation between Locking and Parklands Village.



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

Sites A and B make a greater contribution to a sense of travelling *between* Parklands Village and Locking village, along the vegetated and/or undeveloped A371 corridor, rather than a sense of leaving or arriving at a settlement.

At B there is some sense of leaving Locking when walking along public rights of way (PROW footpaths) running northwards across the site, to the A371, (from where one can cross the A371 to reach Parklands Village). Loss of site B would be a moderate disadvantage regarding this criterion.

Sites A is not crossed by public rights of way, and has existing development at Locking on three sides, including to west and east. Its loss would not have a significant disadvantage regarding this criterion.

Site C makes some contribution to a sense of travelling between Parklands Village and Weston because it is part of the area of countryside between them, comprising fields on the north side of the A371, visible from that road. Loss of site C to development would be a moderate disadvantage regarding this criterion.

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

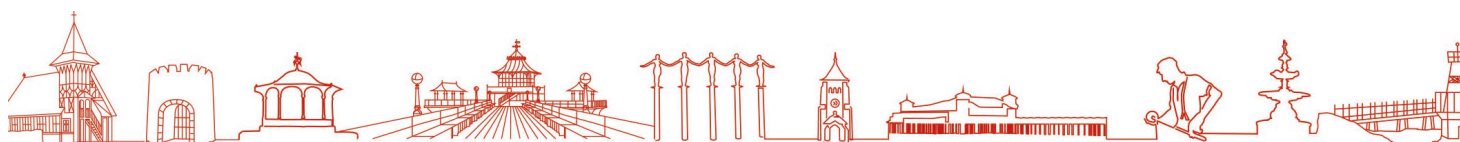
Locking village and Parklands Village are physically close together, so the strategic gap between them is narrow, as indicated under criterion 6 below.

However the visibility of Locking is reduced by the vegetation along the A371 southern frontage, particularly at site B and to a significant extent at A. If those relatively narrow sites were lost to development, but with retention of vegetation buffers along that road frontage, this, together with retention of the road and vegetation on the north side, would still provide a sense of a gap between Locking and Parklands Village, and of their separate identity. Thus loss of sites A and B in this way would not be a significant disadvantage regarding this criterion.

Site C contributes to perception of the separate identity of the settlements, because across it development at Weston, and Parklands Village is visible, with intra-visibility as indicated under criterion 12. It is a larger site than A and B, relatively open and much more clearly visible from the A371, especially near the Locking petrol station. Loss of site C to development would be a major disadvantage regarding this criterion.

### 5. Landscape setting of the settlements

Being relatively small, narrow low-lying sites with tall vegetation fronting the A371, loss of sites A and B to development, providing the vegetation buffers are





retained, would not have a likely significant effect on the settlements' landscape setting.

However, that is not true of site C which is larger, relatively open, higher-lying to the east, and prominent in the landscape from the A371, appearing as attractive grass fields sloping up towards the north east. It makes a significant contribution to the landscape setting of the settlements, particularly Locking and Parklands Village. Its development/removal from the strategic gap would be a major disadvantage regarding this criterion.

## 6. Distance

In the Preferred Options (Reg 18) plan the strategic gap in the A371 corridor is relatively narrow, less than 40m in width on part of site B, excluding the A371 itself, opposite a secondary school site at Parklands Village, directly north of the road. Consequently loss of site B to development would make the strategic gap even narrower in this location, a major disadvantage regarding this criterion. However it should be noted that the strategic gap is already very narrow to the east, due to the reduction that occurred to reflect the Leafy Way housing development approval.

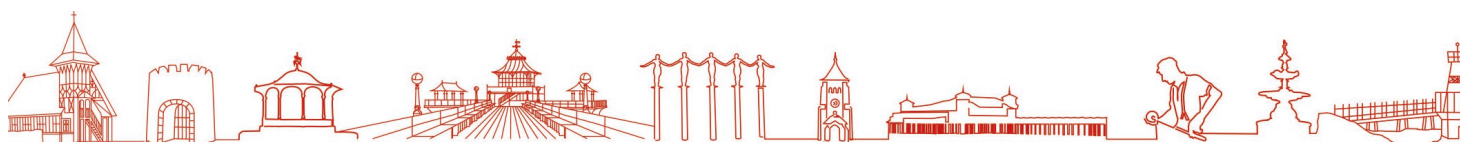
Further west, at site A northwards, the strategic gap is much wider, extending nearly 800m north to Parklands Village near Locking Head Drove, and beyond that over a kilometre to Weston at the A370. Therefore loss of site A, which is relatively narrow compared to that, (under 85m in width to the A371) would not greatly narrow the strategic gap, and only be a moderate disadvantage regarding this criterion.

Loss of site C, which extends to about 290m in width, would considerably narrow the strategic gap so it would reduce to a strip of about 30m width, including the A371 itself, between the site and Homefield industrial estate. That is a major disadvantage regarding this criterion.

## 7. Topography

Sites A and B are of uniform, flat, low-lying topography which helps to reduce their visibility, reinforced by the frontage vegetation. This means that their loss to development would not be a significant disadvantage regarding this criterion.

Conversely site C is of more variable topography, sloping up from low level in the southwest to a prominent height to the east. This would increase the likely potential visual impact of development. Therefore loss of site C to development would be a moderate disadvantage regarding this criterion.



## 8. Vegetation

There is a dense tall tree buffer fronting the A371 at Site B which helps to screen it and would be likely to significantly reduce visual impact if it was developed. Similarly there is vegetation including trees fronting site A which provides a similar screening function, though the trees are generally slightly less tall and dense.

Together with the road itself and further vegetation on its north side opposite site B, this provides a vegetated corridor which provides the sense of a gap between Locking and Parklands Village in this vicinity, as described above.

For these reasons loss of sites A and B to development, providing that the frontage vegetated buffers would be retained, would not be a significant disadvantage regarding this criterion.

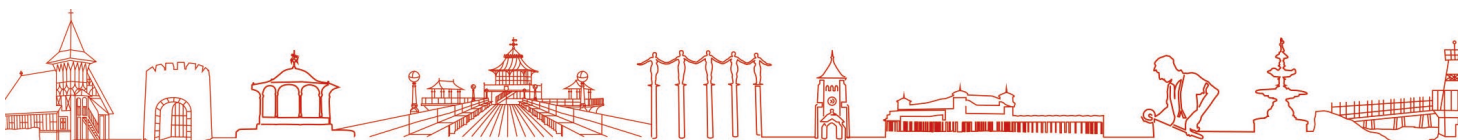
Site C generally has relatively low frontage hedges, particularly its west part, which, with the site's more prominent topography, would be unlikely to provide much effective screening for development. Therefore loss of this site to development would be a moderate disadvantage regarding this criterion.

## 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 very small area at the Motte and Bailey at Locking Head Farm, on the northwest side of Parklands Village.

The SPD indicates that the A4 “*Locking and Banwell Moors character area is generally in a declining condition. Fringe activities such as caravan parks and scrap yards have a disruptive influence on the structure of the landscape and create an unkempt appearance. This is particularly evident west of the M5 and around Weston- super-Mare where the transition between urban and rural is degraded*”; (p.58-59). “*The western part of this character area has undergone considerable urbanisation to the west of the M5 motorway, where the area meets Weston-super-Mare and Locking. The fringes are heavily influenced by marginal activities, such as horse grazing, scrap yards and caravan parks. This section of the area has less vegetation cover, emphasising the very prominent urban edge and exposing the busy A370. Large sections of this part of the character area are dominated by a disused airfield with large hangers used by the Helicopter Museum, new employment development and recent housing employment allocations. The visual connection with the urban edge means that this area has lost much of its former tranquillity*”; (p.57). The SPD adds: “*Urban*



*fringe development around Weston-super-Mare, Locking and recent housing and employment allocations have a strong influence on the character of the western part of this area”;...” the area has undergone considerable urbanisation near the urban edge of Weston-super-Mare and changes in use of agricultural land around the periphery and along the roads”; (p.58).*

The SPD’s Landscape Guidelines include ” *Conserve areas which are characterised by a remote and rural nature of the pastoral landscape, with its absence of settlement and buildings”.... “Promote management of trees, including the remaining orchards and pollard willows and seek opportunities to reinstate these local landscape features”..... “Manage urban fringe development/activity to encourage a sensitive urban/rural interface. Planting of new wet woodland belts may be appropriate in the area adjoining Weston-Super- Mare/Locking/Parklands Village”; (p.59).*

These messages in the SPD suggest it would be particularly appropriate to protect site C through the strategic gap, being relatively open, prominent pasture land which contributes to the pastoral landscape. Loss of site C to development would be a moderate disadvantage regarding this criterion.

However Sites A and B are narrower, not prominent and much better screened. With retention of the tree buffers alongside the road, which is consistent with the SPD, loss of A and B to development would not be a significant disadvantage regarding this criterion.

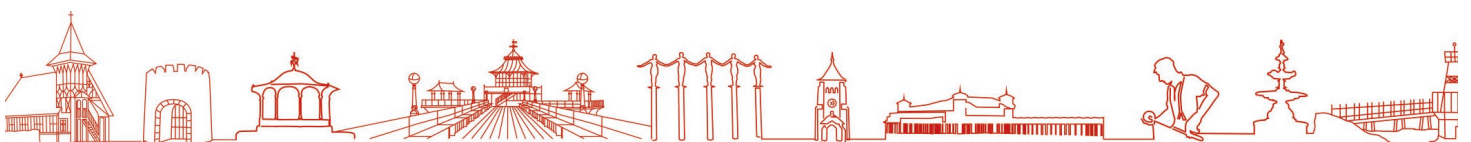
## **10. Existing uses and density of buildings**

There are no buildings within any of the three sites. A and B appear to be managed as mainly grassland, beyond their vegetated frontages, and C as agricultural pasture land.

Site C adjoins further agricultural land and is part of a swathe of pasture land with a few farms, between Weston and Parklands Village. Its retention in the strategic gap, as part of the swathe, is appropriate, and its loss to development would be a moderate disadvantage regarding this criterion..

Sites A and B adjoin housing development at Locking, outside the strategic gap, of densities of roughly 12 and 20 dwellings per ha respectively. While grassland is appropriate for a strategic gap, they are relatively narrow sites, confined close to existing housing, and well screened. Their loss to development would not be a significant disadvantage 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)

There is clear inter-visibility from the settlement limits of Locking by the petrol station near Elm Tree Road, looking across site C towards development at Weston and Parklands Village. There is clear intra-visibility from the north side of the A371 nearby (in the strategic gap) with the petrol station and housing at Locking also being visible, plus development at Weston and Parklands Village. Loss of site C to development would be a major disadvantage regarding both criteria 11 and 12.

There is some inter-visibility looking from the A371 at the Locking settlement limits by the western corner of site A, with development at Weston and Parklands village being visible. There is some intra-visibility from the north side of the A371 nearby, in the strategic gap, looking towards housing at Locking, though partly obscured by the frontage vegetation, with development at Weston visible to the north, and development at Parklands Village. Loss to development of A would be a moderate disadvantage regarding both criteria 11 and 12.

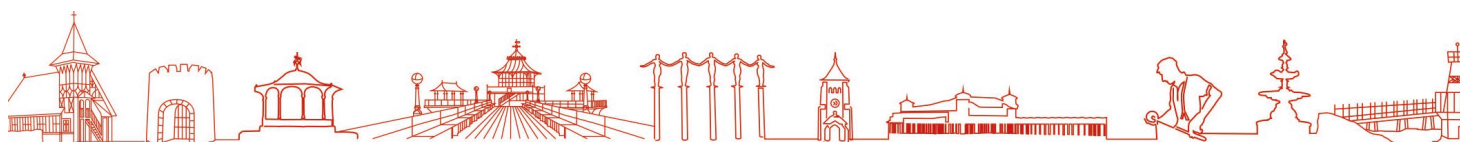
Due to the vegetation buffer along the A371 there is no intervisibility, and only limited intra-visibility, looking from a public right of way (PROW) that runs across site B in the strategic gap, from which housing at Locking and development at Parklands Village are just about visible through trees. Loss to development of B would not be a significant disadvantage regarding criterion 11, and only a moderate disadvantage regarding criterion 12.

### Conclusion

6.22 Consideration of the SHLAA sites A, B and C suggests that their possible loss from the strategic gap to development would have varying significance regarding the 12 criteria.

6.23 Loss of site C would be likely to be the most disadvantageous, notably regarding criteria 2,4,5,6, 11 and 12 for which it would have major disadvantage. There would be moderate disadvantage against 1, 3, 7, 8, 9 and 10. This suggests that site C should remain within the strategic gap.

6.24 Loss of sites A and B would have less impact if buffers of vegetation/trees along their A371 road frontages are retained. Assuming this, loss of site A would have just a moderate disadvantage against criteria 1, 6,11 and 12, and not have a significant disadvantage regarding criteria 2, 3,4,5, 7, 8, 9, and 10. Loss of site B would only have a major disadvantage against criterion 6. It would have just a moderate



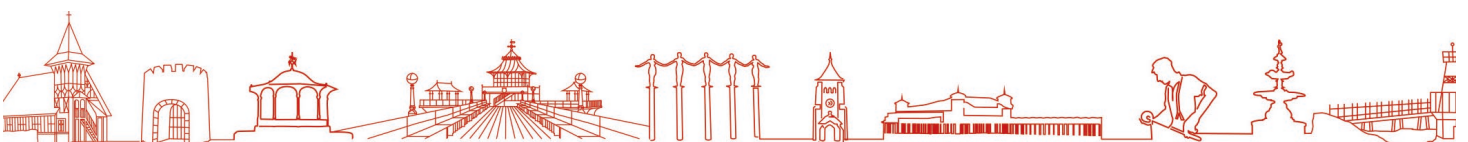
disadvantage against 1, 3, and 12, and not have a significant disadvantage against criteria 2,4,5,7,8,9,10 and 11.

- 6.25 This suggests that, providing there is retention of the vegetation buffers fronting them if they are developed, sites A and B could be removed from the strategic gap, and that is proposed in the Reg 19 Local Plan.
- 6.26 However, if that happened, the remaining strategic gap would be so narrow east of Homefield Industrial Estate and site C (effectively just the road itself and the vegetation buffers), that, given that retention of the vegetation buffers could be required by conditions on planning permissions anyway, there would be little need to retain that very narrow eastern section of strategic gap. It is therefore proposed that it too be deleted in the Reg 19 plan. These changes are summarised in para 7.1 below.

### **Part of the strategic gap south of the A371 between Weston and Locking**

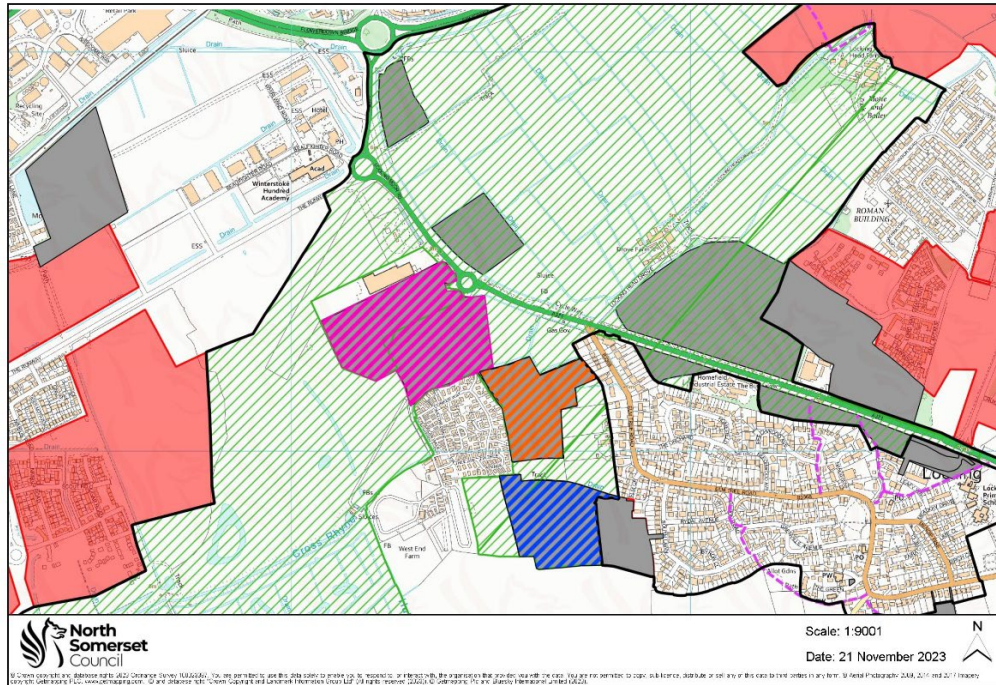
6.27 There were objections to inclusion of some SHLAA sites in this part of the strategic gap. Relevant SHLAA sites for consideration, shown on plan WLH6 below (with the strategic gap hatched in green), are:

- Site 1 (purple hatched) comprising the Weston Business Park (immediately south of the helicopter museum), a coastguard station, and an adjoining grass area south and east of Laney's Drove (road). It is immediately north of a park homes site, Oaktree Park.
- Site 2 (blue hatched) comprising a pasture field south east of Oaktree Park. It adjoins a SAP housing allocation at the former nurseries site at Elm Grove, Locking, within the Locking settlement boundary..
- Site 3 (orange hatched) comprising pasture fields immediately east of Oaktree Park, which run up to the north west boundary of Locking.





Plan WLH6:

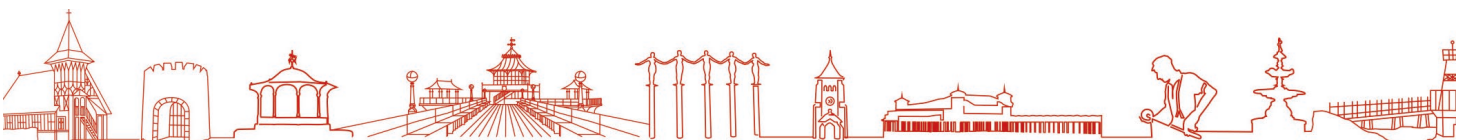


### Consideration against initial statement on strategic gaps

- 6.28 The statement reads: *There is particularly likely to be a need for a strategic gap where there is development pressure, especially pressure leading towards potential coalescence of settlements, and particularly in terms of ribbon development along main roads. The need will be increased where there is unlikely to be a landscape reason for refusal.*
- 6.29 Sites 1, 2 and 3 are all SHLAA sites so there is clearly development pressure. However none of the sites are linear sites lying along main roads, although the corner of the grassland part of site 1 is close to the A371.
- 6.30 Rather they are block-like sites, and the risk of coalescence is more from the potential for them to fill narrow undeveloped gaps between islands of development amidst the strategic gap, than from ribbon development along roads.
- 6.31 Therefore the initial statement on strategic gaps is mainly relevant for all three sites because of development pressure.

### Assessment against the criteria

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



Sites 2 and 3, and the undeveloped grass area part of site 1, are within, and important parts of, the strategic gap, lying between the settlements of Weston (at Haywood Village) and Locking. The helicopter museum, Weston Business Park (a developed part of site 1) and Oaktree Park are islands of development amidst the strategic gap, but only separated by relatively narrow spaces of grassland or fields at sites 1 (part), 2 and 3. The locational importance of these spaces is great, as their loss to development would nearly cause coalescence of the settlements. There would only be a narrow remaining gap of less than 80m between the helicopter museum and the settlement boundary of Weston (Haywood Village).

Therefore loss of each of the undeveloped part of site 1, and sites 2 and 3 would be a major disadvantage regarding this criterion.

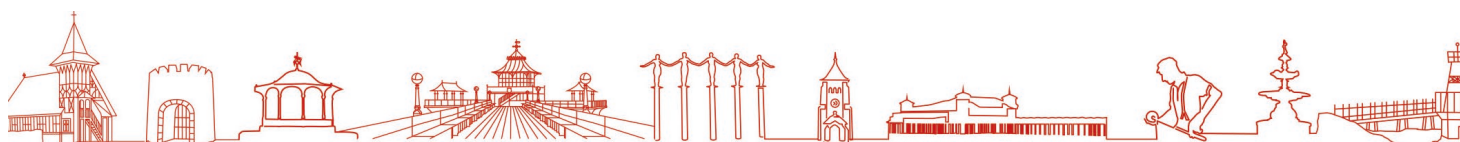
## 2. Sense of the gap

The undeveloped grassland area at Site 1 makes a significant contribution to the sense of the gap, being visible from the A371/Laneys Drove roundabout and from Laneys Drove, with the grassland being part of the swathe of countryside extending to south west, north east, and south east, between Weston, Parklands Village, and Locking.

There is also the sense that the grassland is an important part of the gap, as it separates two islands of development, Weston Business Park and Oaktree Park amidst the gap. Loss of the undeveloped grassland at Site 1 would be a major disadvantage regarding this criterion.

Sites 2 and 3 provide a sense of the gap as they are part of the important undeveloped area between Locking and Oaktree Park which is visible, for example, from land near Hutton, such as by the property Ozmandene on Banwell Road.

Site 2 was affected by the dismissed appeal for application 18/P/2652/OUT for residential development. The Inspector stated *“the effect of the development on the SG (strategic gap) would be most appreciated from the viewpoints in Hutton. From here the southern boundary of the appeal site is clearly discernible and, whilst the site falls away towards its northern boundary, it is still likely that the scheme would be prominent as a link of continual development from Locking to OP (Oaktree Park)....”* *“It would significantly adversely affect the open and undeveloped character of the SG and would compromise the separate identity and character of adjoining settlements, in particular the village of Locking”....* *“the gap between Locking and Haywood Village (and the wider settlement of Weston-Super-Mare) would, in all likelihood, be lost as a result of the development”...* *“Having noted how clearly I could see existing development in the vicinity of the appeal site, it is unlikely that the appellant’s suggestion of*





*an enhanced landscaping scheme along the southern boundary of the appeal site would successfully screen the development from views from Hutton.”*

While the Inspector refers to development on site 2, site 3 is also visible from land near Hutton, by Ozmandene, as it lies to the rear of site 2, and similarly appears as part of the undeveloped area of fields between Oaktree Park and Locking, with Weston visible beyond to the north. Thus site 2 similarly contributes to the sense of the gap.

Loss of sites 2 and 3 would be a major disadvantage regarding this criterion.

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

The grassland at Site 1 makes some contribution to a sense of travelling between Weston and Locking along the A371, because it is part of the area of countryside between the settlements comprising fields either side of the A371, visible from that road and the A371/Laneys Drove roundabout. Loss of the grassland to development would be a moderate disadvantage regarding this criterion.

There are no public rights of way (PROW) across or alongside sites 2 and 3 so their loss would not be a significant disadvantage regarding this criterion.

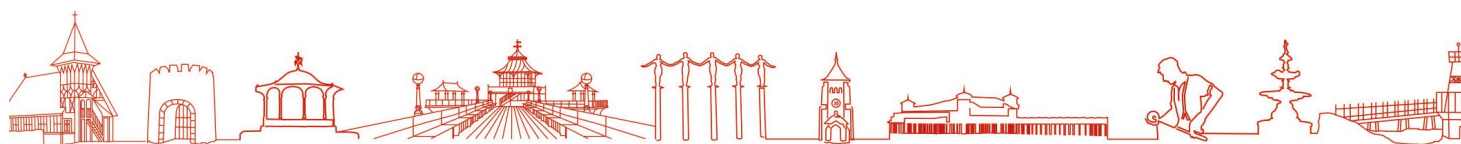
### **4. Sense of place, perception of the separate identity of settlements, actual and perceived proximity of the settlements**

Weston and Locking are in relatively close proximity, separated only by grass spaces/fields between islands of development like the helicopter museum/Weston Business Park and Oaktree Park. Loss of the grassland to development at site 1 would remove one of the spaces; this is likely to be especially apparent in close views from Laneys Drove, with Oaktree Park visible across the grassland.

The proximity of Weston, Parklands Village and Locking can particularly be appreciated in views from the west part of Laneys Drove, as there is intra-visibility across the grassland part of site 1. (See criterion 12 below).

As indicated by the appeal Inspector referred to above, the close proximity of Oaktree Park and Locking can also be perceived from places near Hutton. Loss of sites 2 or 3 to development would remove the gap between them. The Inspector refers to impact on separate identity of settlements, as indicated above.

These close proximities of the settlements are also apparent from maps such as the council's Policies Map, where the narrowness of the gaps between the islands of development, and between those islands and the settlements' limits, can be perceived.



Loss of the grassland part of site 1, and sites 2 and 3 would be a major disadvantage against this criterion.

## 5. Landscape setting of the settlements

Though basically flat, the grassland at site 1 makes some contribution to the landscape setting of the settlements, particularly from the adjacent A371 roundabout and from Laney's Drove, in being part of the swathe of countryside extending to south west, north east, and south east, between Weston, Parklands Village, and Locking. The grassland is visible, and has an attractive rhyme boundary to the west, although there are brambles along parts of other boundaries. Loss of grassland at site 1 would be a moderate disadvantage against this criterion.

Sites 2 and 3 are part of the undeveloped area of fields, attractive with hedgerows, between Oaktree Park and Locking, particularly visible from places near Hutton, as already described. From there their value to the landscape setting of the settlements, particularly Locking, is appreciated. Loss of sites 2 and 3 would be a major disadvantage against this criterion.

## 6. Distance

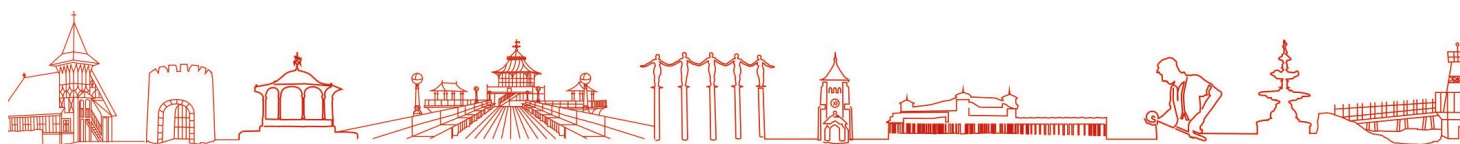
At its closest, the strategic gap between the settlement limits of Weston and Locking is about 700m, (measured crow fly across the strategic gap from near The Runway roundabout at Haydon Village, Weston, and the settlement limits of Locking).

However there are islands of development amidst the gap, at the helicopter museum/Weston Business Park and Oaktree Park, which are only separated by relatively narrow spaces. The gap between the settlement limit of Weston and the helicopter museum is under 80m (crow fly), between Weston Business Park and Oaktree Park about 95m, and between Oaktree Park and the proposed Locking settlement limits about 215m.

Development of the grassland at site 1 would remove the 95m gap, so Weston Business Park and Oaktree Park would join. Development of either of sites 2 and 3 would remove the gap between Oaktree Park and Locking settlement limits, so they would join.

So development of the grassland at site 1, together with either site 2 or 3 would mean that Weston and Locking come close to coalescence, with only the 80m gap between the settlement limit of Weston and the helicopter museum remaining. That would present a strong risk of future coalescence.

Therefore loss of the grassland at sites 1, or of sites 2 or 3 would be a major disadvantage against this criterion.



## 7. Topography

The grassland at site 1 is of uniform, flat topography and, with relatively low boundaries, it is visible, raising its importance in the landscape and as an undeveloped area between islands of development amidst the strategic gap. Its loss would be a moderate disadvantage against this criterion.

Site 2 is also relatively flat but there is a gentle slope downwards from south to north. Site 3 is relatively flat. Despite their non-steeply sloping topography they are visible, particularly from near Hutton, as the appeal Inspector describes for site 2. Loss of sites 2 and 3 would be a moderate disadvantage against this criterion.

## 8. Vegetation

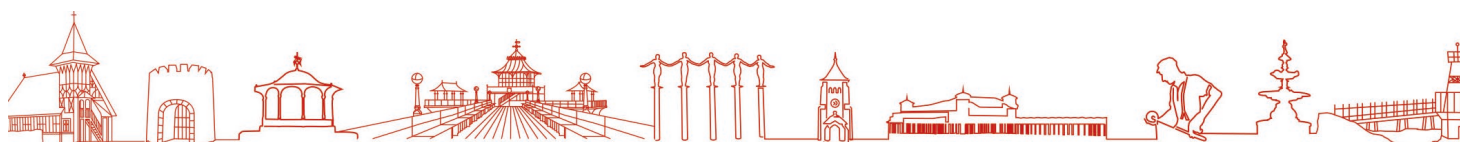
The grassland at site 1 has generally low boundaries, with some just brambles and a rhyne, and is relatively conspicuous, raising its importance as an undeveloped area in this part of the strategic gap. Its loss would be a moderate disadvantage against this criterion.

Sites 2 and 3 have hedgerow boundaries. However they are visible, particularly from near Hutton, by Ozmandene, as described above, and the hedgerows and fields add to the attractiveness of this important undeveloped area between Oaktree Park and Locking. Loss of sites 2 and 3 would be a moderate disadvantage against this criterion.

## 9. Landscape character/type

The Council's Landscape Character Assessment SPD indicates only one Landscape Character Area (LCA) in the vicinity of this part of the strategic gap, (the A4 Locking and Banwell Moors).

The SPD indicates that the A4 “*Locking and Banwell Moors character area is generally in a declining condition. Fringe activities such as caravan parks and scrap yards have a disruptive influence on the structure of the landscape and create an unkempt appearance. This is particularly evident west of the M5 and around Weston- super-Mare where the transition between urban and rural is degraded. ...“The western part of the A4 character area has undergone considerable urbanisation to the west of the M5 motorway, where the area meets Weston-super-Mare and Locking. The fringes are heavily influenced by marginal activities, such as horse grazing, scrap yards and caravan parks. This section of the area has less vegetation cover, emphasising the very prominent urban edge and exposing the busy A370. Large sections of this part of the character area are dominated by a disused airfield with large hangers used by the Helicopter Museum, new employment development and recent housing*



*employment allocations. The visual connection with the urban edge means that this area has lost much of its former tranquillity". The SPD adds: "Urban fringe development around Weston-super-Mare, Locking and recent housing and employment allocations have a strong influence on the character of the western part of this area"...."the area has undergone considerable urbanisation near the urban edge of Weston-super-Mare and changes in use of agricultural land around the periphery and along the roads".*

The SPD's Landscape Guidelines include " *Conserve areas which are characterised by a remote and rural nature of the pastoral landscape, with its absence of settlement and buildings".... "Promote management of trees, including the remaining orchards and pollard willows and seek opportunities to reinstate these local landscape features"..... "Manage urban fringe development/activity to encourage a sensitive urban/rural interface. Planting of new wet woodland belts may be appropriate in the area adjoining Weston-super- Mare/Locking/Parklands Village."*

These messages in the SPD suggest that as part of the pastoral landscape protection of pasture sites 2 and 3, through the strategic gap, is appropriate. Their loss would be a moderate disadvantage regarding this criterion.

The grassland at site 1 is visible from public roads and viewpoints as part of the swathe of countryside described above. Being close to Weston Business Park and other development its protection through the strategic gap would be consistent with preventing further decline in this part of the LCA. Its loss would be a moderate disadvantage regarding this criterion.

## 10. Existing uses and density of buildings

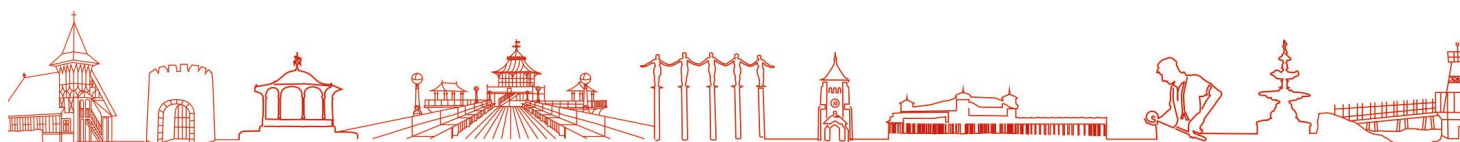
The strategic gap in this area includes few buildings. The grassland part of site 1 is an appropriate land use in the strategic gap.

Site 2 comprises agricultural grassland, an appropriate land use in the strategic gap. There are some buildings, including dilapidated ones, at the former nurseries, on the allocated housing site to the east, but that is outside the strategic gap.

Site 3 is agricultural grassland, an appropriate land use in the strategic gap. It adjoins park homes and other dwellings, at relatively low densities: about 29 and 14 dwellings per ha respectively.

This suggests that the grassland at site 1 and sites 2 and 3 are appropriately included in the strategic gap. Their loss would be a moderate disadvantage against 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)

There is little inter-visibility of the settlements (from a public viewpoint on a settlement's boundary on the edge of the strategic gap) looking across the grassland part of site 1, or sites 2 and 3. Their loss to development would not be significantly disadvantageous regarding criterion 11.

There is clear intra-visibility from the west part of Laneys Drove in the strategic gap looking across the grass area at site 1 with housing at Parklands Village, and also at Locking, visible to the east and development at Weston to the west. Loss of the grass area at site 1 would have a major disadvantage regarding criterion 12.

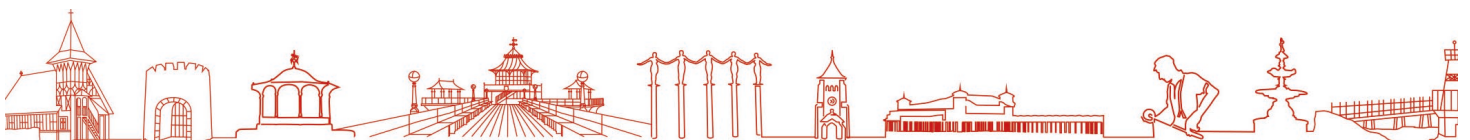
There is little intra-visibility of the settlements across sites 2 and 3 from a public viewpoint actually within or on the edge of the strategic gap. (While in views by Ozmandene near Hutton, development at both Weston and Locking are visible across/by the sites, that viewpoint is not in or bordering the strategic gap.)

Therefore for assessment purposes, to be consistent with the approach followed with other sites, loss of sites 2 and 3 is assessed to not be significantly disadvantageous regarding criterion 12.

However the appeal Inspector stated regarding site 2: " Whilst views of the site from Hutton are not from within the SG (strategic gap), the contribution made by the part of the SG that is within the appeal site is, nevertheless, appreciated from Hutton".

### Conclusion

- 6.32 For the three sites loss to development from the strategic gap would have varying levels of disadvantage regarding the criteria.
- 6.33 Loss of grassland at site 1 would have a major disadvantage against criteria 1, 2, 4, 6 and 12, and a moderate disadvantage against criteria 3, 5, 7,8,9 and 10. It would not be significantly disadvantageous against 11 only. This suggests that the grassland at site 1 should remain within the strategic gap.
- 6.34 Loss of sites 2 and 3 would have major disadvantage against criteria 1,2,4,5 and 6, and a moderate disadvantage against criteria 7,8,9 and 10. It would not be significantly disadvantageous against 3, 11 and 12 only.
- 6.35 This suggests that sites 2 and 3 should also remain within the strategic gap.





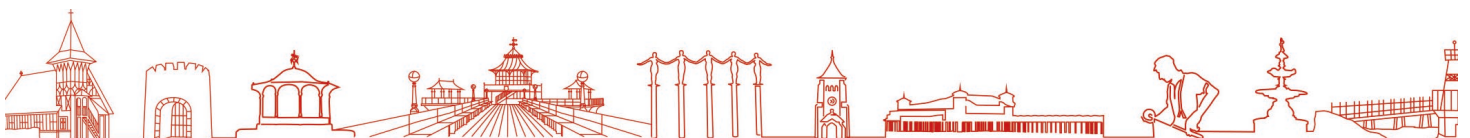
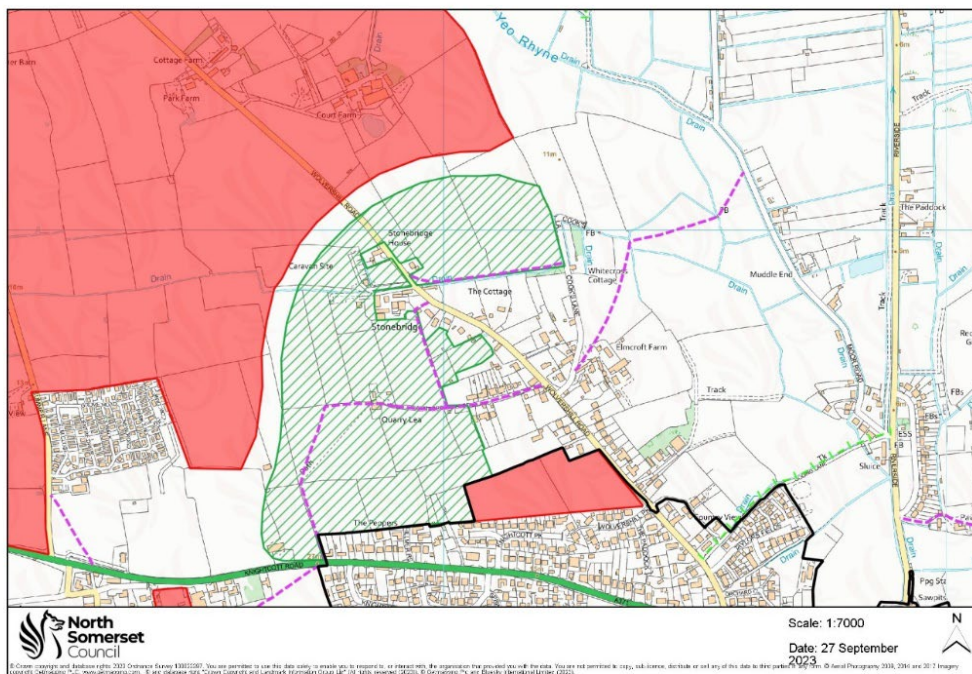
6.36 This suggests it is not appropriate to change this part of the strategic gap. That is reflected in the Pre-submission Plan (Reg 19).

### Strategic gap between Banwell and Wolvershill

6.37 The Preferred Options (Reg 18) plan included a proposed strategic location at Wolvershill, north west of Banwell. In drafting the Preferred Options the council considered that a strategic gap between Banwell and the Wolvershill strategic location might be appropriate, in view of their proximity. This issue was considered and documented in the Strategic Gap Background Paper (March 2020, which included an assessment of a suggested strategic gap against the 12 criteria, and concluded that a strategic gap would be appropriate.

6.38 A Wolvershill/Banwell strategic gap was therefore included in the Preferred Options (Reg 18) Local Plan, shown hatched green on the plan WB1 below. The Wolvershill strategic location then envisaged was the large pink area in the north west corner, separated from the strategic gap by the approximate line of the proposed Banwell bypass. The smaller pink designations were housing allocations.

Plan WB1:

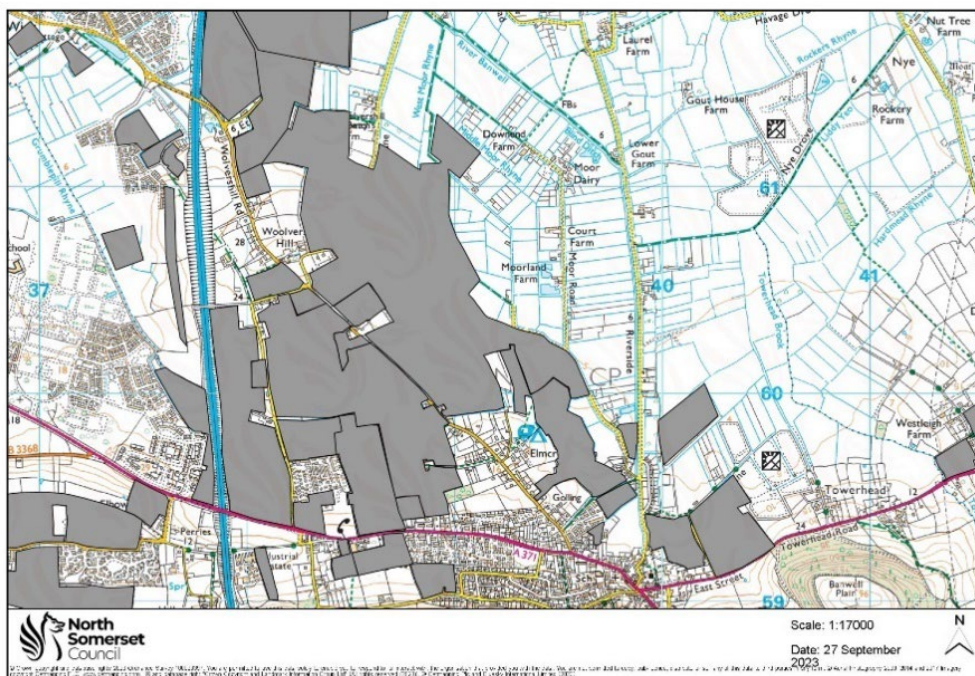


- 6.39 There were no objections received regarding SHLAA sites in the strategic gap, and it has not been considered necessary to review it again against the 12 criteria. However assessment against the new initial statement on strategic gaps is appropriate.

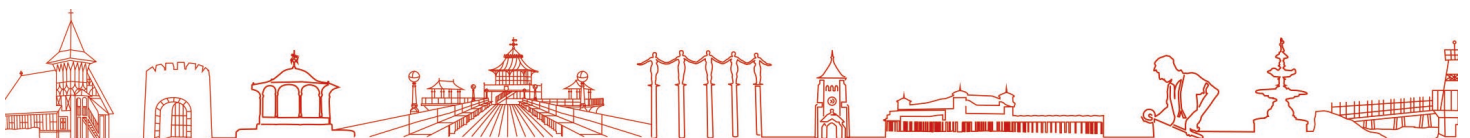
#### Assessment regarding the initial statement

- 6.40 The initial statement on strategic gaps states: *There is particularly likely to be a need for a strategic gap where there is development pressure, especially pressure leading towards potential coalescence of settlements, and particularly in terms of ribbon development along main roads. The need will be increased where there is unlikely to be a landscape reason for refusal.*
- 6.41 There are SHLAA sites on the land between Banwell and the proposed strategic location of Wolvershill, as shown in grey on Plan WB2 below. This shows development pressure.

#### Plan WB2:



- 6.42 Some of the SHLAA sites front roads, such as the A371 west of Banwell, and Wolvershill Road. However they are generally broad-shaped SHLAA sites, not linear “ribbons”.
- 6.43 Overall there is some justification for the strategic gap regarding the initial statement, mainly concerning development pressure.

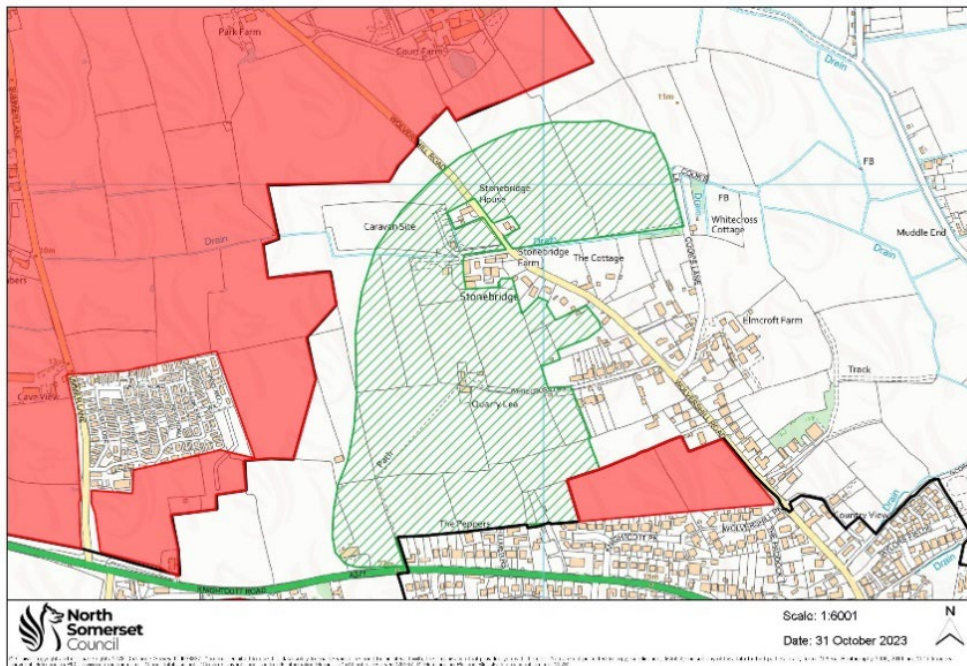




### Consideration of extent of the strategic gap

6.44 Work on the Pre-submission Plan (Reg 19) has suggested that it is still appropriate to include a strategic location at Wolverhill, to accommodate up to around 2,800 dwellings, employment land, etc. However, a slightly altered shape for the allocation is being proposed, as shown in Plan WB3 below. (The same strategic gap is shown as in the Reg 18 plan, bounded by the proposed Banwell bypass route.)

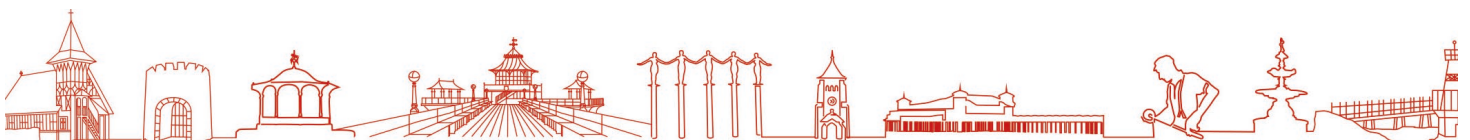
#### Plan WB3:



6.45 Some commentators have suggested that the strategic gap should be extended. One suggestion was that it be extended eastwards to include all of the land between Banwell and the bypass line, not just at the western end.

6.46 However, such an eastward extension is not appropriate as a key function of strategic gaps is the separation of settlements. To designate land further east between the bypass line and Banwell would not achieve this as there is no existing or proposed settlement with a defined settlement boundary close to the bypass line there.

6.47 Another suggestion was that the strategic gap should be more widely drawn to include land south of the A371 west of Banwell, and also land



west of the proposed bypass, because there appears to be “white land” between the proposed strategic location at Wolvershill (see Plan WB3) and the strategic gap that follows the bypass line.

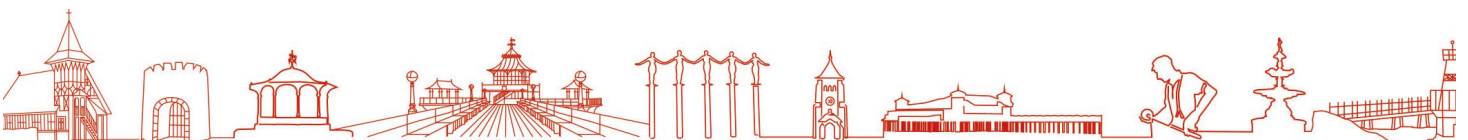
6.48 However, it is considered more appropriate for the strategic gap to follow the bypass line because that is a strong defensible outer boundary for the strategic gap. The bypass joins the A371 west of Banwell and the proposed bypass with its proposed roundabout junction there similarly provides a strong defensible south west boundary of the strategic gap. This is broadly reflected by the strategic gap shown in Plan WB3.

6.49 While there appears to be intervening white land between the strategic location at Wolvershill and the strategic gap, this does not mean that that land should be designated as strategic gap. It is sensible to base the strategic gap boundary on the defensible bypass line, particularly as the future use of the white land is currently undetermined.

6.50 As indicated in the Justification for Policy LP1 of the Reg 19 Local Plan, further guidance will be prepared in the form of a Masterplanning Framework Supplementary Planning Document that will review the development boundary for Wolvershill and provide further detail. Where developers control land that is outside or adjacent to the allocation area, it may be feasible to utilise this land for ecological enhancement or provision of green infrastructure where this is more appropriately located on the periphery of the development.

### Conclusion

6.51 This suggests that the proposed strategic gap between Wolvershill and Banwell, (shown on both plans WB1 and WB3) is appropriate and should remain unchanged. That is reflected in the proposed Reg 19 Local Plan.



## 7. Overall findings of this Background Paper

7.1 This paper has found the strategic gap designation to be still appropriate. It has found that designation of an additional strategic gap between Sandford and Churchill is appropriate, and that some boundary changes to strategic gaps from the Reg 18 plan situation are appropriate, as follows:

- Slight extension to the strategic gap near Hutton to reflect a reduced housing allocation.
- Deletion of narrow parts of the strategic gap in the A371 corridor near Locking, west and east of Homefield Industrial Estate on the south side of the road, and from Locking Moor Industrial Estate eastwards on the north side. Vegetation buffers fronting the A371 must be retained if sites A and B are developed.

7.2 These changes are therefore proposed in the Reg 19 Local Plan.

