

Matter 5 – Strategic Gaps

5.4 Has the identification of Strategic Gaps been the subject of SA? Have the proposed boundaries been tested? How would the Strategic Gaps perform in terms of tests for sustainability?

1. The Sustainability Appraisal scoping report (SD6) sets out at paragraph 7.2 that under the SEA Directive the Council is required to assess the plans effects in comparison *with 'reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme.'* However, the Site Allocation Plan does not have objectives but nests within those of the Core Strategy, as outlined in paragraph 2.8 of the Site Allocation Plan. So we can relate back the scope and detail of what we do to the Core Strategy objectives.
2. The Core Strategy SA covered Strategic Gaps. CS19 is dealt with on pages 131-133 of the Main Report:<http://www.n-somerset.gov.uk/wp-content/uploads/2016/03/SD-07-sustainability-appraisal-main-report.pdf> and pages 401-431 of the Appraisal Tables: <http://www.n-somerset.gov.uk/wp-content/uploads/2015/12/SD-07b-sustainability-appraisal-tables.pdf>
3. A sustainability appraisal has been carried out for the seven proposed strategic gaps within the Site Allocation Plan. This can be viewed at Appendix 1. This appraisal uses those SA objectives deemed to be relevant to the test of sustainability for strategic gaps and tests these against the option of not allocating any strategic gaps – the 'no plan' option.
4. It was determined that the exact boundaries of strategic gaps could not be tested. The proposed strategic gap boundaries in the SAP have been carefully defined and reviewed, taking account of designation criteria, and are considered to be appropriate, logical boundaries. It would not be appropriate or reasonable to artificially 'make up' different boundaries to those, simply for the purposes of obtaining further alternatives for conducting an SA. It would be difficult to justify this also because the number of possible variations, adding or removing a field here or there for example, would be very great, and choosing one or two to provide alternatives would be totally arbitrary.
5. The result of the appraisal for each of the strategic gaps are as follows. Generally in all the strategic gap locations, Option A, (for inclusion of the

proposed strategic gaps) performs well, and generally better than option B (for having no strategic gaps) regarding the environment-related SA sub objectives; (notably those on historic environment, landscape, biodiversity/geodiversity, and minimising vulnerability to flooding). The implications of having detailed local plan policies on those matters would be generally positive for sustainability, and notably the environmental role of planning in sustainable development, referred to in paragraph 7 of the National Planning Policy Framework (NPPF). Not having detailed local plan policies on such matters would generally have a very negative impact. While the NPPF itself sets out principles to be taken into account in determining planning applications, including on environmental matters, much of its guidance promotes the inclusion of policies in local plans.

6. Concerning the social SA sub objectives (such as 1.1, 1.2, and 2.1) the picture is less clear cut. While Option A is generally better performing than Option B, again because not having a detailed local plan policy on the relevant matter is generally likely to have negative consequences for sustainability, (eliminating the scope for specific policy protection of or allocation of community facilities for example). Option A only gets a positive score for one of the social sub-objectives: 1.1 *Achieve reasonable access to public open space*. This is because the restrictive nature of strategic gap policy SA9, particularly the reference to open or undeveloped character of the gap could affect the provision of built community facilities, including changing rooms.
7. That restrictive nature could also affect the provision of employment units, explaining the relatively poor performance of Option A (in all locations) against sub objective 3.1 (*Deliver a reasonable quantum of employment floorspace / land and access to work opportunities for all parts of society*), compared to the environmental sub objectives. However here again Option A still out performs Option B because not having a detailed local plan to allocate or safeguard employment sites would potentially have a very negative impact.

Appendix 1

Sustainability Appraisal of strategic gaps in the Site Allocations Plan Publication Version, October 2016

Introduction

This document has been produced in the light of responses to the Site Allocations Plan (SAP) Publication version which pointed out that strategic gaps proposed in the Plan had not been covered in the [October 2016 Sustainability Appraisal of the Site Allocations Plan](#) . Sustainability Appraisal (SA) of the strategic gaps has now been carried out, documented in this report.

Information on the strategic gaps, including their boundaries and how they were reviewed, prior to production of the Publication Plan, is in a [Background Paper on strategic gaps](#) . Strategic gaps were not proposed in the North Somerset Replacement Plan. Their background in North Somerset is described in Appendix 1 to the Background Paper.

Relevant SA objectives

Consistent with the approach which has been adopted for the October 2016 SA of the Site Allocations Plan (SAP), only those SA sub objectives in the SA framework (referred to in the October 2016 SA) which are deemed to be relevant to strategic gaps have been used in the SA. Those relevant SA sub-objectives are as follows:

1.1	Achieve reasonable access to public open space
1.2	Achieve reasonable access to playing pitches
2.1	Achieve reasonable access to a full range of community facilities
3.1	Deliver a reasonable quantum of employment floorspace / land and access to work opportunities for all parts of society
4.1	Minimise impact on and where appropriate enhance the historic environment, heritage assets and their settings
4.2	To protect and where possible enhance biodiversity and geodiversity at a landscape scale, particularly with respect to protected habitats and species

4.3	Minimise impact on and where appropriate enhance valued landscapes, recognising its wider purposes (natural beauty, enjoyment and cultural heritage) whilst having regard for economic and social well-being. Including that within or close to the Mendip Hills AONB
4.4	Promote the conservation and wise use of land, maximising the reuse of previously developed land
4.5	Minimised the loss of productive land, especially the best and most versatile agricultural land
4.6	Minimise vulnerability to tidal/fluviial flooding, without increasing flood risk elsewhere
4.7	Minimise vulnerability to surface water flooding and other sources of flooding, without increasing flood risk elsewhere
4.8	Minimise impacts on air quality through locating development in locations least likely to contribute to traffic congestion
5.5	Minimise harm to the countryside by containing development within existing defined settlement boundaries

In addition a further SA objective (below) which was used for SA of the Core Strategy has been considered, because it was felt that it could potentially be relevant to an SA of strategic gaps.

SC1	Meet housing requirement.
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Identification of options

Having had regard to the approach which was adopted in the October 2016 SA, the options identified for SA comprise the proposed strategic gap allocations in the SAP, (named as in the Background Paper on strategic gaps) and a 'no plan' option for comparison with each of those (which assumes that there would not be detailed Local Plans in North Somerset.) The resulting options have been named A and B for convenience:

- Option A: Proposed strategic gaps allocations in the Site Allocations Plan
- Option B: strategic gaps not allocated – No Plan.

It is considered that these options comprise reasonable alternatives. The proposed strategic gap boundaries in the SAP have been carefully defined and reviewed, (as described in the Background Paper), taking account of designation criteria, and are considered to be appropriate, logical boundaries. It would not be appropriate or reasonable to artificially “make up” different boundaries to those, simply for the purposes of obtaining further alternatives for conducting an SA. It would be difficult to justify this also because the number of possible variations, adding or removing a field here or there for example, would be very great, and choosing one or two to provide alternatives would be totally arbitrary.

Appraisal system for appraising the options

++	Very positive impact
+	Positive impact
-	Neutral
x	Negative impact
xx	Very negative impact
?	Uncertain effects

Results of the SA assessment

Appraisal tables

1. Strategic Gap between Weston-super-Mare and Hutton

SA Objectives	Measurable Targets	Option Effects	Compatibility	Comments/ justification	Adjustments required
1.1 Achieve reasonable access to public open space	Hectares of accessible open space per 1000 population and whether this is in in under supply in 1 or more of the categories assessed	Option A: SAP allocations	+	Protection of open undeveloped land would tend to increase scope for public open space.	No
		Option B: No Plan	xx	No protection of/ detailed policies regarding access to public open space without a Local Plan.	

SA Objectives	Measurable Targets	Option Effects	Compatibility	Comments/ justification	Adjustments required
1.2 Achieve reasonable access to playing pitches	Standard of provision should equal one pitch per 1750 aged 16-45 and 1 junior pitch per populations aged 11–15.	Option A: SAP allocations	-	Strategic gap would have neutral impact because although protection of open land would tend to increase scope for playing pitches, restriction on development regarding the open or undeveloped character could restrict that scope, due to need for changing rooms.	No
		Option B: No plan	xx	No protection of/ detailed policies regarding access to playing pitches without a Local Plan.	
2.1 Achieve reasonable access to a full range of community facilities	Development located within reasonable distance of a convenience store, post office and meeting venues	Option A: SAP allocations	x	Strategic gap would potentially reduce opportunities for community facilities to develop/expand onto undeveloped land within strategic gap. However there are opportunities for that on land outside the strategic gap.	No
		Option B: No plan	xx	No detailed policies regarding access to protection of, or allocation of land for, community facilities without a Local Plan.	
3.1 Deliver a reasonable quantum of employment floorspace / land and access to work opportunities for all parts of society	Economic activity rates Average earnings No. of jobs by sector and area	Option A: SAP allocations	x	Strategic gap would potentially reduce opportunities for businesses to develop/expand onto undeveloped land within strategic gap. However there are opportunities for that on land outside the strategic gap, and the SAP allocates/safeguards land for employment.	No
		Option B: No Plan	xx	It is very unlikely that the market alone, (without promotion of employment through Local Plan policies/allocations), would deliver employment floorspace at the rate required to meet the need identified in the Core Strategy.	
4.1 Minimise impact on and where appropriate enhance the historic	No. of up to date conservation area appraisals	Option A: SAP allocations	+	Protection of strategic gap would tend to increase likelihood of historic assets	No

SA Objectives	Measurable Targets	Option Effects	Compatibility	Comments/ justification	Adjustments required
environment, heritage assets and their settings	No. of listed buildings repaired and brought back into use			on/within it being protected from development.	
		Option B: No Plan	xx	No detailed policies regarding protection of historic assets without a Local Plan.	
4.2 To protect and where possible enhance biodiversity and geodiversity at a landscape scale, particularly with respect to protected habitats and species	No. of application approvals that generate significant biodiversity impacts	Option A: SAP allocations	+	Protection of strategic gap would tend to increase likelihood of protected species and valuable habitats on it being protected from development.	No
		Option B: No Plan	xx	No detailed policies regarding protection of biodiversity without a Local Plan.	
4.3 Minimise impact on and where appropriate enhance valued landscapes	Number of planning applications in the Mendip Hills AONB with commentary on anticipated impacts.	Option A: SAP allocations	+	Protection of strategic gap would tend to increase likelihood of landscape between the settlements being protected, including land close to and visible from the Mendip Hills AONB to the south.	No
		Option B: No Plan	xx	No detailed policies regarding protection of landscape without a Local Plan.	
4.5 Minimise the loss of productive land, especially the best and most versatile agricultural land	Development on land with no current or immediate potential agricultural value loss of Best and Most Versatile Agricultural Land to development	Option A: SAP allocations	?	Most of this strategic gap is agricultural land grade 3. We do not know whether that is 3a (BMV land).	No
		Option B: No Plan	-	Neutral impact, as neither Core Strategy, SAP nor Development Management Policies Local Plan appear to cover this issue, but NPPF makes some reference to it.	
4.6 Minimise vulnerability to tidal/fluvial flooding without increasing flood risk elsewhere	Development which mitigates existing flood risk from tidal or fluvial sources	Option A: SAP allocations	+	Protection of undeveloped land in strategic gaps will help, although most of the flood land in this strategic gap, particularly the north part, is flood zone 3B, where most forms of built development is not appropriate anyway.	No

SA Objectives	Measurable Targets	Option Effects	Compatibility	Comments/ justification	Adjustments required
		Option B: No Plan	xx	No detailed policies regarding flooding without a Local Plan.	
4.7 Minimise vulnerability to surface water flooding and other sources of flooding, without increasing flood risk elsewhere	Development which mitigates existing flood risk from surface water sources	Option A: SAP allocations	+	There are some areas particularly vulnerable to surface water flooding in this strategic gap, particularly the north part ; (shown on the Environment Agency flood maps layers for surface water 1 in 30 and/or 1 in 100 on the Council's digital mapping system Earthlight). The protection from development provided by the strategic gap would potentially be beneficial, although any development potentially affecting those areas would be likely to require SUDs (sustainable drainage systems) anyway	No
		Option B: No Plan	xx	No detailed policies regarding flooding without a Local Plan.	
5.5 Minimise harm to the countryside by containing development within existing defined settlement boundaries	The number of applications approved outside of the settlement boundary	Option A: SAP allocations	-	Neutral effect, because whilst the strategic gap would help restrict development to within settlement limits in the vicinity of the strategic gap, it could potentially also divert pressure to land outside the settlement limits elsewhere.	No
		Option B: No Plan	xx	No detailed policies regarding settlement limits and countryside without a Local Plan.	
SC1 Meet housing requirement.	Existence of opportunities (commentary), e.g. relative to location or scale	Option A: SAP allocations	-	Neutral effect, because the SAP makes sufficient allocations to meet the housing requirement without affecting the strategic gaps, including this one.	No
		Option B: No Plan	xx	No policies allocating land for housing without a Local Plan.	

2. Strategic Gap between Weston-super-Mare, Locking and Parklands Village

SA Objectives	Measurable Targets	Option Effects	Compatibility	Comments/ justification	Adjustments required
1.1 Achieve reasonable access to public open space	Hectares of accessible open space per 1000 population and whether this is in under supply in 1 or more of the categories assessed	Option A: SAP allocations	+	Protection of open undeveloped land would tend to increase scope for public open space.	No
		Option B: No Plan	xx	No protection of/ detailed policies regarding access to public open space without a Local Plan.	
1.2 Achieve reasonable access to playing pitches	Standard of provision should equal one pitch per 1750 aged 16-45 and 1 junior pitch per populations aged 11–15.	Option A: SAP allocations	-	Strategic gap would have neutral impact because although protection of open land would tend to increase scope for playing pitches, restriction on development regarding the open or undeveloped character could restrict that scope, due to need for changing rooms.	No
		Option B: No plan	xx	No protection of/ detailed policies regarding access to playing pitches without a Local Plan.	
2.1 Achieve reasonable access to a full range of community facilities	Development located within reasonable distance of a convenience store, post office and meeting venues	Option A SAP allocations	x	Strategic gap would potentially reduce opportunities for community facilities to develop/expand onto undeveloped land within strategic gap. However there are opportunities for that on land outside the strategic gap,	No
		Option B: No plan	xx	No detailed policies regarding access to protection of, or allocation of land for, community facilities.	
3.1 Deliver a reasonable quantum of employment floorspace / land and access to work opportunities for all parts of society	Economic activity rates Average earnings No. of jobs by sector and area	Option A: SAP allocations	x	Strategic gap would potentially reduce opportunities for businesses to develop/expand onto undeveloped land within strategic gap. However there are opportunities for that on land outside the strategic gap, and the SAP allocates/safeguards land for employment.	No

SA Objectives	Measurable Targets	Option Effects	Compatibility	Comments/ justification	Adjustments required
		Option B: No Plan	xx	It is very unlikely that the market alone, (without promotion of employment through Local Plan policies/allocations), would deliver employment floorspace at the rate required to meet the need identified in the Core Strategy.	
4.1 Minimise impact on and where appropriate enhance the historic environment, heritage assets and their settings	No. of up to date conservation area appraisals No. of listed buildings repaired and brought back into use	Option A: SAP allocations	+	Protection of strategic gap would tend to increase likelihood of historic assets on it being protected from development. They include the Motte and Bailey near Locking Parklands, although that is also protected as a scheduled monument.	No
		Option B: No Plan	xx	No detailed policies regarding protection of historic assets without a Local Plan.	
4.2 To protect and where possible enhance biodiversity and geodiversity at a landscape scale, particularly with respect to protected habitats and species	No. of application approvals that generate significant biodiversity impacts	Option A: SAP allocations	+	Protection of strategic gap would tend to increase likelihood of protected species and valuable habitats on it being protected from development.	No
		Option B: No Plan	xx	No detailed policies regarding protection of biodiversity without a Local Plan.	
4.3 Minimise impact on and where appropriate enhance valued landscapes	Number of planning applications in the Mendip Hills AONB with commentary on anticipated impacts.	Option A: SAP allocations	+	Protection of strategic gap would tend to increase likelihood of landscape between the settlements being protected.	No
		Option B: No Plan	xx	No detailed policies regarding protection of landscape without a Local Plan.	
4.5 Minimise the loss of productive land, especially the best and most versatile agricultural land	Development on land with no current or immediate potential agricultural value loss of Best and Most Versatile Agricultural Land to development	Option A: SAP allocations	?	Most of this strategic gap is agricultural land grade 3. We do not know whether that is 3a (BMV land)	No

SA Objectives	Measurable Targets	Option Effects	Compatibility	Comments/ justification	Adjustments required
		Option B: No Plan	-	Neutral impact, as neither Core Strategy, SAP nor Development Management Policies Local Plan appear to cover this issue, but NPPF makes some reference to it.	
4.6 Minimise vulnerability to tidal/fluvi al flooding without increasing flood risk elsewhere	Development which mitigates existing flood risk from tidal or fluvi al sources	Option A: SAP allocations	++	Protection of undeveloped land in strategic gaps will help greatly. Much of this strategic gap is flood zone 3, including some 3B near the Airport roundabout.	No
		Option B: No Plan	xx	No detailed policies regarding flooding without a Local Plan.	
4.7 Minimise vulnerability to surface water flooding and other sources of flooding, without increasing flood risk elsewhere	Development which mitigates existing flood risk from surface water sources	Option A: SAP allocations	+	There are some areas particularly vulnerable to surface water flooding in this strategic gap, such as near Drove Farm for example. The protection from development provided by the strategic gap would potentially be beneficial, although any development potentially affecting those areas would be likely to require SUDs anyway	No
		Option B: No Plan	xx	No detailed policies regarding flooding without a Local Plan.	
5.5 Minimise harm to the countryside by containing development within existing defined settlement boundaries	The number of applications approved outside of the settlement boundary	Option A: SAP allocations	-	Neutral effect, because whilst strategic gap would help restrict development to within settlement limits in vicinity of the strategic gap, it could potentially also divert pressure to land outside the settlement limits elsewhere.	No
		Option B: No Plan	xx	No detailed policies regarding settlement limits and countryside without a Local Plan.	
SC1 Meet housing requirement.	Existence of opportunities (commentary), e.g. relative to location or scale	Option A: SAP allocations	-	Neutral effect, because the SAP makes sufficient allocations to meet the housing requirement without affecting the strategic gaps, including this one.	No
		Option B: No Plan	xx	No policies allocating land for housing without a Local Plan.	

3. Strategic Gap between Weston-super-Mare and Uphill

SA Objectives	Measurable Targets	Option Effects	Compatibility	Comments/ justification	Adjustments required
1.1 Achieve reasonable access to public open space	Hectares of accessible open space per 1000 population and whether this is in in under supply in 1 or more of the categories assessed	Option A: SAP allocations	+	Protection of open undeveloped land would tend to increase scope for public open space.	No
		Option B: No Plan	xx	No protection of/ detailed policies regarding access to public open space without a Local Plan.	
1.2 Achieve reasonable access to playing pitches	Standard of provision should equal one pitch per 1750 aged 16-45 and 1 junior pitch per populations aged 11–15.	Option A: SAP allocations	-	Strategic gap would have neutral impact because although protection of open land would tend to increase scope for playing pitches, restriction on development regarding the open or undeveloped character could restrict that scope, due to need for changing rooms. Also this strategic gap includes existing playing fields which would potentially already have some level of protection from development for other uses, under policy DM68 of the adopted Development Management Policies Plan , although the strategic gap would reinforce that.	No
		Option B: No plan	xx	No protection of/ detailed policies regarding access to playing pitches without a Local Plan.	
2.1 Achieve reasonable access to a full range of community facilities	Development located within reasonable distance of a convenience store, post office and meeting venues	Option A SAP allocations	x	Strategic gap would potentially reduce opportunities for community facilities to develop/expand onto undeveloped land within strategic gap. However there are opportunities for that on land outside the strategic gap.	No
		Option B: No plan	xx	No detailed policies regarding access to protection of, or allocation of land for, community facilities without a Local Plan	

SA Objectives	Measurable Targets	Option Effects	Compatibility	Comments/ justification	Adjustments required
3.1 Deliver a reasonable quantum of employment floorspace / land and access to work opportunities for all parts of society	Economic activity rates Average earnings No. of jobs by sector and area	Option A: SAP allocations	x	Strategic gap would potentially reduce opportunities for businesses to develop/expand onto undeveloped land within strategic gap. However there are opportunities for that on land outside the strategic gap, and the SAP allocates/safeguards land for employment.	No
		Option B: No Plan	xx	It is very unlikely that the market alone, (without promotion of employment through Local Plan policies/allocations), would deliver employment floorspace at the rate required to meet the need identified in the Core Strategy.	
4.1 Minimise impact on and where appropriate enhance the historic environment, heritage assets and their settings	No. of up to date conservation area appraisals No. of listed buildings repaired and brought back into use	Option A: SAP allocations	+	Protection of strategic gap would tend to increase likelihood of historic assets on it being protected from development. They include archaeological sites like the “run of Meer stones, Uphill Great Rhyne”, on the HER, for example.	No
		Option B: No Plan	xx	No detailed policies regarding protection of historic assets without a Local Plan.	
4.2 To protect and where possible enhance biodiversity and geodiversity at a landscape scale, particularly with respect to protected habitats and species	No. of application approvals that generate significant biodiversity impacts	Option A: SAP allocations	+	Protection of strategic gap would tend to increase likelihood of protected species and valuable habitats on it being protected from development.	No
		Option B: No Plan	xx	No detailed policies regarding protection of biodiversity without a Local Plan.	
4.3 Minimise impact on and where appropriate enhance valued landscapes	Number of planning applications in the Mendip Hills AONB with commentary on anticipated impacts.	Option A: SAP allocations	+	Protection of strategic gap would tend to increase likelihood of landscape between the settlements being protected.	No
		Option B: No Plan	xx	No detailed policies regarding protection of landscape without a Local Plan.	

SA Objectives	Measurable Targets	Option Effects	Compatibility	Comments/ justification	Adjustments required
4.5 Minimise the loss of productive land, especially the best and most versatile agricultural land	Development on land with no current or immediate potential agricultural value loss of Best and Most Versatile Agricultural Land to development	Option A: SAP allocations	?	While much of this strategic gap is agricultural land grade 4, there is a large part which is grade 3, and we do not know whether that is 3a (BMV land).	No
		Option B: No Plan	-	Neutral impact, as neither Core Strategy, SAP nor Development Management Policies Local Plan appear to cover this issue, but NPPF makes some reference to it.	
4.6 Minimise vulnerability to tidal/fluviial flooding without increasing flood risk elsewhere	Development which mitigates existing flood risk from tidal or fluviial sources	Option A: SAP allocations	++	Protection of undeveloped land in strategic gaps will help greatly. Much of this strategic gap is flood zone 3A, including much of the golf course and land between Grange Road and the cricket ground.	No
		Option B: No Plan	xx	No detailed policies regarding flooding without a Local Plan.	
4.7 Minimise vulnerability to surface water flooding and other sources of flooding, without increasing flood risk elsewhere	Development which mitigates existing flood risk from surface water sources	Option A: SAP allocations	+	There are some areas particularly vulnerable to surface water flooding in this strategic gap, though they are fairly limited and widely dispersed. The protection from development provided by the strategic gap would potentially be beneficial, although any development potentially affecting those areas would be likely to require SUDs anyway	No
		Option B: No Plan	xx	No detailed policies regarding flooding without a Local Plan.	
5.5 Minimise harm to the countryside by containing development within existing defined settlement boundaries	The number of applications approved outside of the settlement boundary	Option A: SAP allocations	-	Neutral effect, because whilst strategic gap would help restrict development to within settlement limits in vicinity of the strategic gap, it could potentially also divert pressure to land outside the settlement limits elsewhere.	No

SA Objectives	Measurable Targets	Option Effects	Compatibility	Comments/ justification	Adjustments required
		Option B: No Plan	xx	No detailed policies regarding settlement limits and countryside without a Local Plan.	
SC1 Meet housing requirement.	Existence of opportunities (commentary), e.g. relative to location or scale	Option A: SAP allocations	-	Neutral effect, because the SAP makes sufficient allocations to meet the housing requirement without affecting the strategic gaps, including this one.	No
		Option B: No Plan	xx	No policies allocating land for housing without a Local Plan.	

4. Strategic Gap between Weston-super-Mare and St Georges

SA Objectives	Measurable Targets	Option Effects	Compati bility	Comments/ justification	Adjustments required
1.1 Achieve reasonable access to public open space	Hectares of accessible open space per 1000 population and whether this is in under supply in 1 or more of the categories assessed	Option A: SAP allocations	+	Protection of open undeveloped land would tend to increase scope for public open space.	No
		Option B: No Plan	xx	No protection of/ detailed policies regarding access to public open space without a Local Plan.	
1.2 Achieve reasonable access to playing pitches	Standard of provision should equal one pitch per 1750 aged 16-45 and 1 junior pitch per populations aged 11–15.	Option A: SAP allocations	-	Strategic gap would have neutral impact because although protection of open land would tend to increase scope for playing pitches, restriction on development regarding the open or undeveloped character could restrict that scope, due to need for changing rooms. Also this strategic gap includes existing school playing fields which would potentially already have some level of protection from development for other uses, under policy DM68 of the adopted Development Management Policies Plan , although the strategic gap would reinforce that.	No
		Option B: No plan	xx	No protection of/ detailed policies regarding access to playing pitches without a Local Plan.	
2.1 Achieve reasonable access to a full range of community facilities	Development located within reasonable distance of a convenience store, post office and meeting venues	Option A SAP allocations	x	Strategic gap would potentially reduce opportunities for community facilities to develop/expand onto undeveloped land within strategic gap. However there are opportunities for that on land outside the strategic gap.	No
		Option B: No plan	xx	No detailed policies regarding access to protection of, or allocation of land for, community facilities without a Local Plan.	

SA Objectives	Measurable Targets	Option Effects	Compatibility	Comments/ justification	Adjustments required
3.1 Deliver a reasonable quantum of employment floorspace / land and access to work opportunities for all parts of society	Economic activity rates Average earnings No. of jobs by sector and area	Option A: SAP allocations	x	Strategic gap would potentially reduce opportunities for businesses to develop/expand onto undeveloped land within strategic gap. However there are opportunities for that on land outside the strategic gap, and the SAP allocates/safeguards land for employment.	No
		Option B: No Plan	xx	It is very unlikely that the market alone, (without promotion of employment through Local Plan policies/allocations), would deliver employment floorspace at the rate required to meet the need identified in the Core Strategy.	
4.1 Minimise impact on and where appropriate enhance the historic environment, heritage assets and their settings	No. of up to date conservation area appraisals No. of listed buildings repaired and brought back into use	Option A: SAP allocations	+	Protection of strategic gap would tend to increase likelihood of historic assets on it being protected from development. They include archaeological sites like the "Roman occupation NE of Priory School, St Georges", on the HER, for example.	No
		Option B: No Plan	xx	No detailed policies regarding protection of historic assets without a Local Plan.	
4.2 To protect and where possible enhance biodiversity and geodiversity at a landscape scale, particularly with respect to protected habitats and species	No. of application approvals that generate significant biodiversity impacts	Option A: SAP allocations	+	Protection of strategic gap would tend to increase likelihood of protected species and valuable habitats on it being protected from development.	No
		Option B: No Plan	xx	No detailed policies regarding protection of biodiversity without a Local Plan.	
4.3 Minimise impact on and where appropriate enhance valued landscapes	Number of planning applications in the Mendip Hills AONB with commentary on anticipated impacts.	Option A: SAP allocations	+	Protection of strategic gap would tend to increase likelihood of landscape between the settlements being protected.	No
		Option B: No Plan	xx	No detailed policies regarding protection of landscape without a Local Plan.	

SA Objectives	Measurable Targets	Option Effects	Compatibility	Comments/ justification	Adjustments required
4.5 Minimise the loss of productive land, especially the best and most versatile agricultural land	Development on land with no current or immediate potential agricultural value loss of Best and Most Versatile Agricultural Land to development	Option A: SAP allocations	?	This strategic gap is classed as agricultural land grade 3, and we do not know whether that is 3a (BMV land).	No
		Option B: No Plan	-	Neutral impact, as neither Core Strategy, SAP nor Development Management Policies Local Plan appear to cover this issue, but NPPF makes some reference to it.	
4.6 Minimise vulnerability to tidal/fluvial flooding without increasing flood risk elsewhere	Development which mitigates existing flood risk from tidal or fluvial sources	Option A: SAP allocations	++	Protection of undeveloped land in strategic gaps will help greatly. This strategic gap is entirely flood zone 3, including some 3B in the NE part.	No
		Option B: No Plan	xx	No detailed policies regarding Flooding without a Local Plan.	
4.7 Minimise vulnerability to surface water flooding and other sources of flooding, without increasing flood risk elsewhere	Development which mitigates existing flood risk from surface water sources	Option A: SAP allocations	-	Regarding this strategic gap the only areas particularly vulnerable to surface water flooding are adjoining the strategic gap, and relatively few, and widely dispersed. The effect of the strategic gap would therefore potentially be limited, and any development potentially affecting those areas would be likely to require SUDs anyway	No
		Option B: No Plan	xx	No detailed policies regarding flooding without a Local Plan.	
5.5 Minimise harm to the countryside by containing development within existing defined settlement boundaries	The number of applications approved outside of the settlement boundary	Option A: SAP allocations	-	Neutral effect, because whilst strategic gap would help restrict development to within settlement limits in vicinity of the strategic gap, it could potentially also divert pressure to land outside the settlement limits elsewhere.	No
		Option B: No Plan	xx	No detailed policies regarding settlement limits and countryside without a Local Plan.	

SA Objectives	Measurable Targets	Option Effects	Compati bility	Comments/ justification	Adjustments required
SC1 Meet housing requirement.	Existence of opportunities (commentary), e.g. relative to location or scale	Option A: SAP allocations	-	Neutral effect, because the SAP makes sufficient allocations to meet the housing requirement without affecting the strategic gaps, including this one.	No
		Option B: No Plan	xx	No policies allocating land for housing without a Local Plan.	

5. Strategic Gap between Congresbury and Yatton

SA Objectives	Measurable Targets	Option Effects	Compatibility	Comments/ justification	Adjustments required
1.1 Achieve reasonable access to public open space	Hectares of accessible open space per 1000 population and whether this is in under supply in 1 or more of the categories assessed	Option A: SAP allocations	+	Protection of open undeveloped land would tend to increase scope for public open space.	No
		Option B: No Plan	xx	No protection of/ detailed policies regarding access to public open space without a Local Plan.	
1.2 Achieve reasonable access to playing pitches	Standard of provision should equal one pitch per 1750 aged 16-45 and 1 junior pitch per populations aged 11–15.	Option A: SAP allocations	-	Strategic gap would have neutral impact because although protection of open land would tend to increase scope for playing pitches, restriction on development regarding the open or undeveloped character could restrict that scope, due to need for changing rooms.	No
		Option B: No plan	xx	No protection of/ detailed policies regarding access to playing pitches without a Local Plan.	
2.1 Achieve reasonable access to a full range of community facilities	Development located within reasonable distance of a convenience store, post office and meeting venues	Option A: SAP allocations	x	Strategic gap would potentially reduce opportunities for community facilities to develop/expand onto undeveloped land within strategic gap. However there are opportunities for that on land outside the strategic gap.	No
		Option B: No plan	xx	No detailed policies regarding access to protection of, or allocation of land for, community facilities without a Local Plan.	
3.1 Deliver a reasonable quantum of employment floorspace / land and access to work opportunities for all parts of society	Economic activity rates Average earnings No. of jobs by sector and area	Option A: SAP allocations	x	Strategic gap would potentially reduce opportunities for businesses to develop/expand onto undeveloped land within strategic gap. However there are opportunities for that on land outside the strategic gap, and the SAP allocates/safeguards land for employment.	No

SA Objectives	Measurable Targets	Option Effects	Compatibility	Comments/ justification	Adjustments required
		Option B: No Plan	xx	It is very unlikely that the market alone, (without promotion of employment through Local Plan policies/allocations), would deliver employment floorspace at the rate required to meet the need identified in the Core Strategy.	
4.1 Minimise impact on and where appropriate enhance the historic environment, heritage assets and their settings	No. of up to date conservation area appraisals No. of listed buildings repaired and brought back into use	Option A: SAP allocations	+	Protection of strategic gap would tend to increase likelihood of historic assets on it being protected from development. They include archaeological sites like the “cropmarks of enclosures, possible settlement” at Congresbury Moor on the HER, for example.	No
		Option B: No Plan	xx	No detailed policies regarding protection of historic assets without a Local Plan.	
4.2 To protect and where possible enhance biodiversity and geodiversity at a landscape scale, particularly with respect to protected habitats and species	No. of application approvals that generate significant biodiversity impacts	Option A: SAP allocations	+	Protection of strategic gap would tend to increase likelihood of protected species and valuable habitats on it being protected from development.	No`
		Option B: No Plan	xx	No detailed policies regarding protection of biodiversity without a Local Plan.	
4.3 Minimise impact on and where appropriate enhance valued landscapes	Number of planning applications in the Mendip Hills AONB with commentary on anticipated impacts.	Option A: SAP allocations	+	Protection of strategic gap would tend to increase likelihood of landscape between the settlements being protected.	No
		Option B: No Plan	xx	No detailed policies regarding protection of landscape without a Local Plan.	

SA Objectives	Measurable Targets	Option Effects	Compatibility	Comments/ justification	Adjustments required
4.5 Minimise the loss of productive land, especially the best and most versatile agricultural land	Development on land with no current or immediate potential agricultural value loss of Best and Most Versatile Agricultural Land to development	Option A: SAP allocations	?	This strategic gap is classed as mainly agricultural land grade 3, and we do not know whether that is 3a (BMV land). While there is certainly some BMV land (grade 1 near Frost Hill for example) that is a very much smaller proportion of the strategic gap.	No
		Option B: No Plan	-	Neutral impact, as neither Core Strategy, SAP nor Development Management Policies Local Plan appear to cover this issue, but NPPF makes some reference to it.	
4.6 Minimise vulnerability to tidal/fluvial flooding without increasing flood risk elsewhere	Development which mitigates existing flood risk from tidal or fluvial sources	Option A: SAP allocations	+	Protection of undeveloped land in strategic gaps will help, but much of the flood land in this strategic gap, (such as at Congresbury Moor), is flood zone 3B, where most forms of built development is not appropriate anyway.	No
		Option B: No Plan	xx	No detailed policies regarding flooding without a Local Plan.	
4.7 Minimise vulnerability to surface water flooding and other sources of flooding, without increasing flood risk elsewhere	Development which mitigates existing flood risk from surface water sources	Option A: SAP allocations	+	There are numerous areas particularly vulnerable to surface water flooding in this strategic gap. The protection from development provided by the strategic gap would potentially be beneficial, although any development potentially affecting those areas would be likely to require SUDs anyway.	No
		Option B: No Plan	xx	No detailed policies regarding flooding without a Local Plan.	
5.5 Minimise harm to the countryside by containing development within existing defined settlement boundaries	The number of applications approved outside of the settlement boundary	Option A: SAP allocations	-	Neutral effect, because whilst strategic gap would help restrict development to within settlement limits in vicinity of the strategic gap, it could potentially also divert pressure to land outside the settlement limits elsewhere.	No

SA Objectives	Measurable Targets	Option Effects	Compatibility	Comments/ justification	Adjustments required
		Option B: No Plan	xx	No detailed policies regarding settlement limits and countryside without a Local Plan.	
SC1 Meet housing requirement.	Existence of opportunities (commentary), e.g. relative to location or scale	Option A: SAP allocations	-	Neutral effect, because the SAP makes sufficient allocations to meet the housing requirement without affecting the strategic gaps, including this one.	No
		Option B: No Plan	xx	No policies allocating land for housing without a Local Plan.	

6. Strategic Gap between Nailsea and Backwell

SA Objectives	Measurable Targets	Option Effects	Compatibility	Comments/ justification	Adjustments required
1.1 Achieve reasonable access to public open space	Hectares of accessible open space per 1000 population and whether this is in in under supply in 1 or more of the categories assessed	Option A: SAP allocations	+	Protection of open undeveloped land would tend to increase scope for public open space.	No
		Option B: No Plan	xx	No protection of/ detailed policies regarding access to public open space without a Local Plan.	
1.2 Achieve reasonable access to playing pitches	Standard of provision should equal one pitch per 1750 aged 16-45 and 1 junior pitch per populations aged 11–15.	Option A: SAP allocations	-	Strategic gap would have neutral impact because although protection of open land would tend to increase scope for playing pitches, restriction on development regarding the open or undeveloped character could restrict that scope, due to need for changing rooms.	No
		Option B: No plan	xx	No protection of/ detailed policies regarding access to playing pitches without a Local Plan.	
2.1 Achieve reasonable access to a full range of community facilities	Development located within reasonable distance of a convenience store, post office and meeting venues	Option A: SAP allocations	x	Strategic gap would potentially reduce opportunities for community facilities to develop/expand onto undeveloped land within strategic gap. However there are opportunities for that on land outside the strategic gap.	No
		Option B: No plan	xx	No detailed policies regarding access to protection of, or allocation of land for, community facilities without a Local Plan.	
3.1 Deliver a reasonable quantum of employment floorspace / land and access to work opportunities for all parts of society	Economic activity rates Average earnings No. of jobs by sector and area	Option A: SAP allocations	x	Strategic gap would potentially reduce opportunities for businesses to develop/expand onto undeveloped land within strategic gap. However there are opportunities for that on land outside the strategic gap, and the SAP allocates/safeguards land for employment.	No

SA Objectives	Measurable Targets	Option Effects	Compatibility	Comments/ justification	Adjustments required
		Option B: No Plan	xx	It is very unlikely that the market alone, (without promotion of employment through Local Plan policies/allocations), would deliver employment floorspace at the rate required to meet the need identified in the Core Strategy.	
4.1 Minimise impact on and where appropriate enhance the historic environment, heritage assets and their settings	No. of up to date conservation area appraisals No. of listed buildings repaired and brought back into use	Option A: SAP allocations	+	Protection of strategic gap would tend to increase likelihood of historic assets on it being protected from development. They include archaeological sites like the “tramway from Whiteoak Colliery to railway C19”, NW of Coombe Grange, on the HER, for example.	No
		Option B: No Plan	xx	No detailed policies regarding protection of historic assets without a Local Plan.	
4.2 To protect and where possible enhance biodiversity and geodiversity at a landscape scale, particularly with respect to protected habitats and species	No. of application approvals that generate significant biodiversity impacts	Option A: SAP allocations	+	Protection of strategic gap would tend to increase likelihood of protected species and valuable habitats on it being protected from development.	No
		Option B: No Plan	xx	No detailed policies regarding protection of biodiversity without a Local Plan.	
4.3 Minimise impact on and where appropriate enhance valued landscapes	Number of planning applications in the Mendip Hills AONB with commentary on anticipated impacts.	Option A: SAP allocations	+	Protection of strategic gap would tend to increase likelihood of landscape between the settlements being protected.	No
		Option B: No Plan	xx	No detailed policies regarding protection of landscape without a Local Plan.	

SA Objectives	Measurable Targets	Option Effects	Compatibility	Comments/ justification	Adjustments required
4.5 Minimise the loss of productive land, especially the best and most versatile agricultural land	Development on land with no current or immediate potential agricultural value loss of Best and Most Versatile Agricultural Land to development	Option A: SAP allocations	+	Most of this strategic gap is classed as agricultural land grade 2, (BMV land) and it is possible (though uncertain) that the rest could be 3a (BMV land), although all we know is that that is grade 3. Protection of the strategic gap from development would help to protect the BMV land.	No
		Option B: No Plan	-	Neutral impact, as neither Core Strategy, SAP nor Development Management Policies Local Plan appear to cover this issue, but NPPF makes some reference to it.	
4.6 Minimise vulnerability to tidal/fluvial flooding without increasing flood risk elsewhere	Development which mitigates existing flood risk from tidal or fluvial sources	Option A: SAP allocations	+	Protection of undeveloped land in strategic gaps will help, but the limited flood land in this strategic gap, (south west of Backwell Lake) is fluvial flood zone 3B, where most forms of built development is not appropriate anyway.	No
		Option B: No Plan	xx	No detailed policies regarding flooding without a Local Plan.	
4.7 Minimise vulnerability to surface water flooding and other sources of flooding, without increasing flood risk elsewhere	Development which mitigates existing flood risk from surface water sources	Option A: SAP allocations	+	There are areas particularly vulnerable to surface water flooding in this strategic gap, but mainly confined to areas within the flood land described above, with only limited areas elsewhere. The protection from development provided by the strategic gap would potentially be beneficial, although any development potentially affecting those areas would be likely to require SUDs anyway.	No
		Option B: No Plan	xx	No detailed policies regarding flooding without a Local Plan.	
5.5 Minimise harm to the countryside by containing development	The number of applications approved outside of the settlement boundary	Option A: SAP allocations	-	Neutral effect, because whilst strategic gap would help restrict development to within settlement limits in vicinity of the strategic gap, it could potentially also divert pressure	No

SA Objectives	Measurable Targets	Option Effects	Compatibility	Comments/ justification	Adjustments required
within existing defined settlement boundaries				to land outside the settlement limits elsewhere.	
		Option B: No Plan	xx	No detailed policies regarding settlement limits and countryside without a Local Plan.	
SC1 Meet housing requirement.	Existence of opportunities (commentary), e.g. relative to location or scale	Option A: SAP allocations	-	Neutral effect, because the SAP makes sufficient allocations to meet the housing requirement without affecting the strategic gaps, including this one.	No
		Option B: No Plan	xx	No policies allocating land for housing without a Local Plan.	

Conclusion

Generally in all the strategic gap locations, Option A, (for inclusion of the proposed strategic gaps) performs well, and generally better than option B (for having no strategic gaps) regarding the environment-related SA sub objectives; (notably those on historic environment, landscape, biodiversity/ geodiversity, and minimising vulnerability to flooding). The implications of having detailed local plan policies on those matters would be generally positive for sustainability, and notably the environmental role of planning in sustainable development, referred to in paragraph 7 of the National Planning Policy Framework (NPPF). Not having detailed local plan policies on such matters would generally have a very negative impact. While the NPPF itself sets out principles to be taken into account in determining planning applications, including on environmental matters, much of its guidance promotes the inclusion of policies in local plans.

Concerning the social SA sub objectives (such as 1.1, 1.2, and 2.1) the picture is less clear cut. While Option A is generally better performing than Option B, again because not having a detailed local plan policy on the relevant matter is generally likely to have negative consequences for sustainability, (eliminating the scope for specific policy protection of or allocation of community facilities for example) Option A only gets a positive score for one of the social sub-objectives: 1.1 Achieve reasonable access to public open space. This is because the restrictive nature of strategic gap policy SA9, particularly the reference to open or undeveloped character of the gap, could affect the provision of built community facilities, including changing rooms.

That restrictive nature could also affect the provision of employment units, explaining the relatively poor performance of Option A (in all locations) against sub objective 3.1 (Deliver a reasonable quantum of employment floorspace / land and access to work opportunities for all parts of society), compared to the environmental sub objectives. However here again Option A still outperforms Option B because not having a detailed local plan to allocate or safeguard employment sites would potentially have a very negative impact.