

Matter 5 – Local Green Space and Strategic Gaps

5.5 Do the SG listed at paragraph 4.52 of the SAP, and shown on the Policies Map deliver CS Policy CS19?

- i Has the Council considered whether SG should be included around service and infill villages?**
- ii Are the SG between Locking and Weston s Mare, and Nailsea and Backwell justified?**
- iii Would it be necessary to amend the SG between Yatton and Congresbury if the need for a development of a medical centre within the SG was demonstrated?**

1. The Council has produced a [Strategic Gaps Background Paper](#) (SD13), which sets out how the strategic gaps listed in paragraph 4.52 of the Site Allocations Plan (SAP) have been reviewed against criteria. That document in itself demonstrates how the strategic gaps deliver policy CS19, because they clearly show how the strategic gaps are important to helping to retain the separate identity, character and/or landscape setting of the settlements and distinct parts of settlements. Criteria 2, 4, and 5 are particularly relevant to that.

(i) Has the Council considered whether SG should be included around service and infill villages?

2. In preparing the Site Allocations Plan the Council has focused on consideration of the seven locations identified as being appropriate for investigation for possible designation of strategic gaps in paragraph 3.243 of the Core Strategy. They were considered to be the most appropriate and logical locations for investigation, having regard to the proximity of settlements and the sensitivity of the locations. For instance, in all of those cases the settlements are within 1km of each other (measuring between settlement boundaries), and most are significantly closer.
3. Yatton Parish Council (3106433//5) responded to the Publication Plan requesting a strategic gap at the North End of Yatton, implying that it is needed to prevent the village from potentially joining with Kingston Seymour

or Kenn. Congresbury Residents Association Group (15569185//6) responded similarly.

4. The Core Strategy did not identify the location between Yatton and Kingston Seymour/Kenn as one for investigation for a possible strategic gap. A strategic gap is not considered appropriate in that location. The distance between Yatton and Kenn is nearly 2.2km, and between Yatton and Kingston Seymour is over 1.6km. Both those distances are significantly greater than the 1km not exceeded in the case of the proposed strategic gap locations.
5. Furthermore, Kingston Seymour is not even an infill village in planning policy terms and therefore does not have a defined settlement boundary. It would not be appropriate for strategic gaps to be drawn where there are no settlement boundaries. In addition the M5 is a significant barrier between Kingston Seymour and Yatton.
6. In response to the Publication Plan Churchill Parish Council (1190177//1) have stated that “strategic gaps must be identified and included around Banwell, Sandford, Churchill, Langford and indeed for all Service Villages and Infill Villages”. Regarding those named settlements, the parish council states “no explanation is given for their omission but these locations merit inclusion for the very same reasons that the other locations do”. Congresbury Residents Association Group (15569185//6) responded similarly.
7. The Council’s view is that strategic gaps should only be proposed where there are clear demonstrable reasons for their designation. It would not be appropriate to apply the designation to a much wider range of settlements which could potentially conflict with the need to deliver the identified housing requirement.

(ii) Are the SG between Locking and Weston s Mare, and Nailsea and Backwell justified?

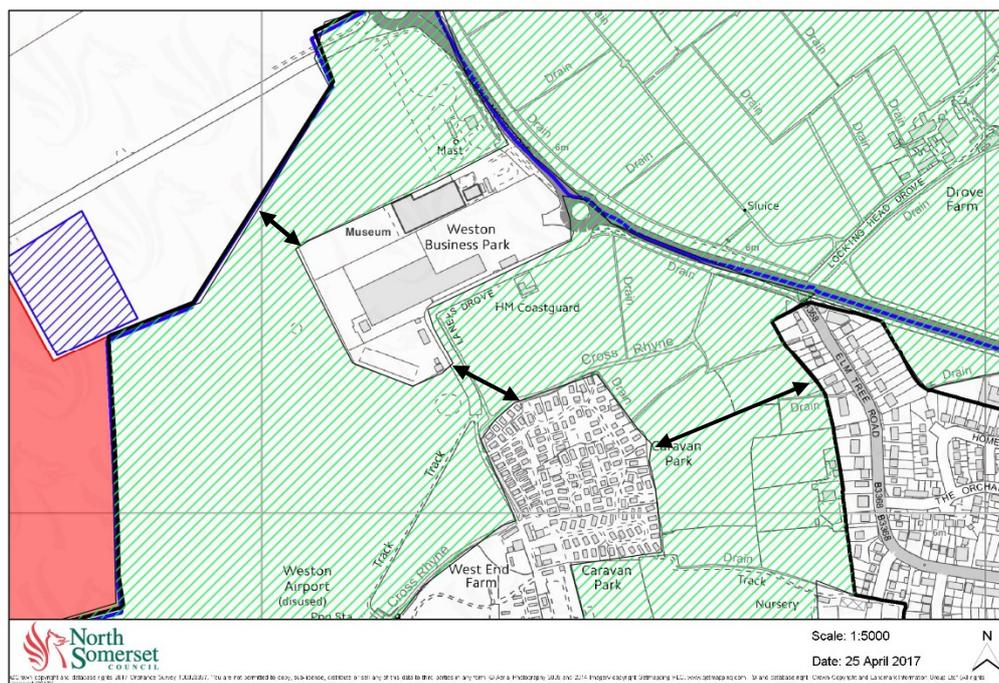
8. The justification for strategic gaps in general is set out in Appendix 1 of the Council’s [Strategic Gaps Background Paper](#) (SD13), notably under paragraph 4.

Strategic gap between Locking and Weston super Mare

9. The strategic gap between Locking and Weston super Mare (Weston) is part of a strategic gap referred to under paragraph 5 of the Background Paper, which includes land between those settlements and also between those settlements and Parklands Village. That document explains how the strategic gap has been reviewed against revised designation criteria, which reinforces the case for its protection, and indicates the importance of the strategic gap to

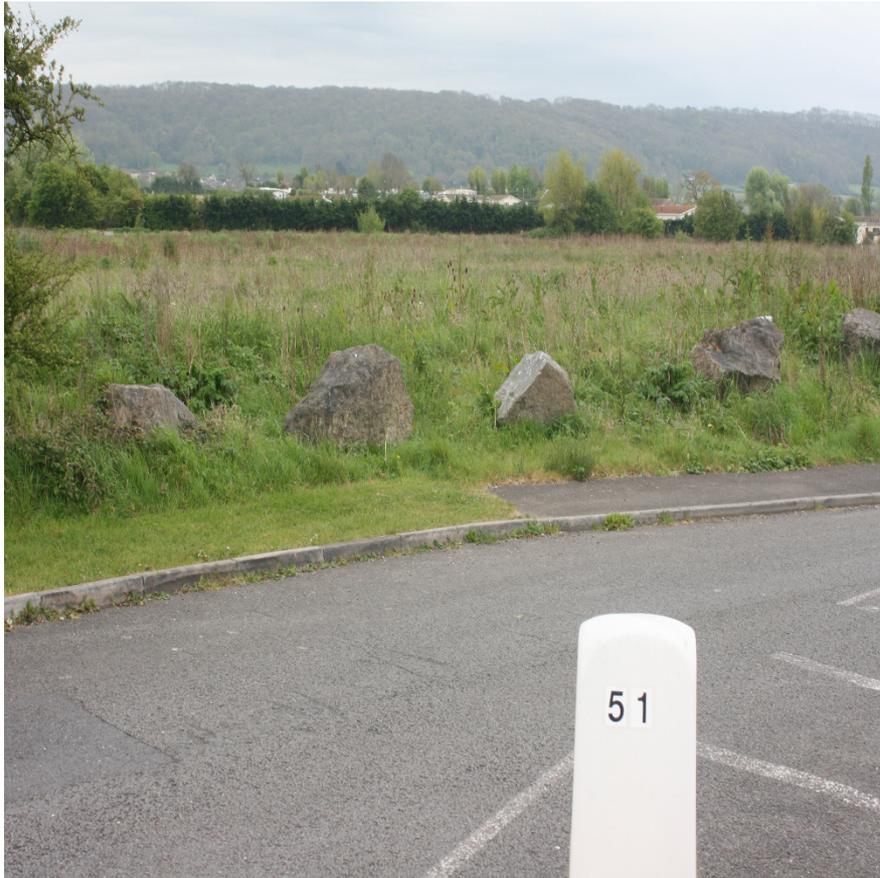
help retain the separate identity, character and/or landscape setting of the settlements, in line with Policy CS19 of the Core Strategy.

10. This strategic gap also includes land to the north of Locking on either side of the A371 which is important not only for maintaining the separation of Locking and Weston but also Locking and Parklands Village as proposed for development. The gap between the latter, notably from Locking Head Drove eastwards, is relatively narrow and important for maintaining the separate identity of the settlements and preventing their coalescence. It includes attractive pasture land, on the north side of the A371, rising to the east.
11. Oaktree Parks Ltd (14824225//1) have objected to the inclusion of land between the Oaktree Park residential park homes site, and Locking, in the strategic gap.
12. Moor Park (North Somerset) Ltd. (represented by Rocke Associates) have objected to the inclusion of land north of Oaktree Park, up to employment development at Weston Business Park/the Helicopter Museum at Laneys Drove, in the strategic gap. That land is currently subject to a planning application for mixed use development including 115 dwellings.
13. However, both these areas are particularly important parts of the strategic gap, as described in paragraph 5.7 of the Background Paper. They are relatively narrow (down to about 230m and 100m wide respectively), and their loss to development would leave only a very narrow area of remaining undeveloped land (down to under 80m) between the Helicopter Museum and the proposed settlement limits of Haywood Village. These three distances are reflected by the arrows of differing lengths on the map below



14. Loss of these narrow undeveloped areas to development would potentially result in coalescence of Locking and Weston, making them particularly important parts of the strategic gap, notably for maintaining the separate identity of the settlements, as indicated in paragraph 5.7. This is relevant to criterion 4 of the criteria for defining/review of strategic gaps in the Background Paper. The above points also relate to criteria 1 (location of land in relation to settlements) and 6 (distance).
15. The above undeveloped areas are also part of a wider swathe of grass land and fields between Locking and Weston in the A371 corridor which, particularly when travelling along that road, make some contribution to the sense of leaving or arriving at a settlement (criterion 3). Also, particularly through their open and/or undeveloped nature, they make some contribution to the sense of the gap (criterion 2) and to the landscape setting of the settlements (criterion 5). The open grass land north of Oaktree Park is particularly visible from the A371/Laneys Drove roundabout, and from Laneys Drove itself; (see photo A below).
16. The inclusion of the above areas in the strategic gap is therefore justified.

Photo A (below). Land north of Oaktree Park, with Oaktree Park homes visible, seen from Laneys Drove



Strategic gap between Nailsea and Backwell

17. The justification for the strategic gap between Nailsea and Backwell is set out in the Background Paper from paragraph 9.0. It explains how the strategic gap has been reviewed against revised designation criteria and is considered to be appropriate.
18. Gleeson Strategic Land (4602593//1) has criticised the Background Paper as “poorly presented” and failing to demonstrate a robust approach or to explain or justify the need for a strategic gap in this location.
19. The Council disagrees. The methodology is clearly explained in the Background Paper, indicating how the strategic gaps have each been assessed with regard to the same criteria. That process and the criteria themselves provide a logical structure to the document.
20. Gleeson Strategic Land state that the Background Paper uses “disingenuous photographs to illustrate factors that clearly do not exist”. The ACD Environmental Landscape Appraisal which they commissioned (hereon referred to as the ACD Report) paragraph 2.10 criticises the photos as “being unrepresentative...clearly selective and in some instances zoomed to feature particular features or features”.

21. The photos in the Background Paper are not disingenuous. They were taken in summer 2016 with a lens set at 50mm, so were not zoomed. The section on the Nailsea-Backwell strategic gaps includes just five photos, and while some help to illustrate points made in the text, (as mentioned below) it was not the intention to provide a comprehensive photographic assessment. Rather it was felt that photos would add interest to a long text document. The inclusion of a large number of photographs is no substitute for a site visit.
22. In paragraph 3.2 of the ACD Report, ACD Environmental indicate that they took their photos with a lens set at 35mm focal length. In April 2017 the Council retook some photos with the lens set at 35mm, rather than 50mm. (They were from the same positions as Photos NB2 and NB5 in the Background Paper, and a position which was intended to be, but is actually east of, that for Photo NB4). The more recent photos and their view point positions are shown in the Appendices below. It is considered that the recent photos illustrate the same points in the Background Paper concerning the original photos, notably in paragraph 9.3, and paragraphs 9.5-9.7.
23. In paragraph 4.3 (1) the ACD Report implies that the southern edge of Nailsea “faces south west and not towards Backwell”, and “the perception is therefore is of open countryside, not the proximity of Backwell”.
24. However in fact there is a clear perception of the proximity of the settlements, and clear inter and intra-visibility between the settlements from public vantage points referred to in the Background Paper, notably in paragraph 9.3. They include places within or on the edge of the strategic gap, at or very close to the southern edge of Nailsea, including the public open space at The Perrings, Nailsea, and public footpaths in/bordering the strategic gap such as a number of points along the Morgans Hill public footpath/bridleway, between the Perrings and in the vicinity of the Grove Sports Centre playing fields. Backwell is clearly visible from those places, as can be seen from photos NB2 and NB5 in the Background Paper (and photos 1 and 2 in the Appendices below). Photo 3 in the Appendices, showing housing at Nailsea, was taken from the same point as photo 2, but looking east, and thus shows that there is clear intra-visibility regarding development at both settlements from that western position in the strategic gap. The sense of the gap, and of the actual and perceived proximity of the settlements is particularly strong.
25. These points relate to criteria 1, 2, 4, 6 and 12 in the Background Paper, and help to demonstrate why the proposed strategic gap as drawn, is justified. They directly oppose the statement in paragraph 4.5 of the ACD Report, that the “areas to the west are irrelevant and have no logical reason to be included within the Gap”, and the ACD Report’s implication (paragraph 4.3) that the sense of the gap is “restricted to the Station Road corridor”. The photos in the ACD Report fail to illustrate the existing inter-visibility and intra-visibility between Nailsea and Backwell.

26. The ACD Report (paragraph 4.3) also implies that the only perception of leaving or arriving at a settlement (criterion 3) is “along Station Road, as there are no other north-south routes that provide this experience”. In fact there are routes further west within the proposed strategic gap which also provide this perception, notably Youngwood Lane combined with public footpaths connecting with it. Public footpaths are shown on Map 1 in the Appendices below.
27. The ACD Report proposes a very restricted strategic gap which is inappropriate. Centred on Station Road, half of it is Green Belt, which in itself is inappropriate, contrary to paragraph 3.4 of Appendix 1 of the Background Paper.
28. Policy CS19 of the adopted Core Strategy indicates that “the council will protect strategic gaps to help retain the separate identity, character and/or landscape setting of settlements and distinct parts of settlements”. As indicated in paragraphs 9.6-9.7 of the Background Paper, the strategic gap as proposed by the Council is very important to the landscape setting of the settlements, particularly the undeveloped slope, descending from the high-lying southern edge of Nailsea, but also the flatter pasture land to the south, all visible from roads or public footpaths. The very restricted strategic gap proposed by ACD Environmental would exclude those important areas.
29. The undeveloped slope and flatter pasture land are open to view from various places along Youngwood Lane, public footpaths and when travelling by train, as explained in paragraphs 9.5-9.7 of the Background Paper. Examples of viewpoints are Photos NB4 of the Background Paper, and Photo 4 in the Appendix below. The landscape is much more open than the ACD Report suggests, as it refers to “visual enclosure” (against Vegetation) in its paragraph 4.3. The openness can be seen in Photos NB4, Photo 4 and some of the photos in the ACD Report, such as VP3 and VP11.
30. The undeveloped slopes in particular are also important regarding criterion 7 Topography. The Floyd Matcham Landscape Appraisal commissioned by Gleeson Strategic Land, paragraph 3.12 states that “the topography of the gap comprises a valley landform with moderate slopes on the north side of the River Kenn, and gentle slopes on part of the south side. This valley forms a well-defined topographic feature which gives support for designation of a strategic gap”. The slope on the north side extends well to the west, as shown in Photo 4 of the Appendices, and photo NB4 of the Background Paper, which was taken further west still.
31. Regarding land outside the Green Belt, the very restricted strategic gap proposed by ACD Environmental would only cover Backwell Lake and land immediately south of that, which is largely fluvial flood zone 3B. Thus that

strategic gap would effectively only include land inappropriate for most forms of built development anyway. (See Map 2 showing fluvial flood zone 3B, in the Appendices below).

32. Gleeson Strategic Land state that there is “no logical justification for designating a very extensive strategic gap where there is no actual or perceived risk of coalescence between the settlements’ boundaries”.
33. It is acknowledged that the presence of the zone 3B fluvial flood land reduces the likelihood of actual coalescence of development at Nailsea and Backwell. However as indicated in policy CS19, strategic gaps concern retaining the separate identity, character and/or landscape setting of settlements, which is far more than just preventing coalescence. North of the railway the flood zone 3b is a relatively narrow restricted band (down to about 55m near Youngwood House Farm), and development of the surrounding land in the proposed strategic gap would potentially be very harmful, regarding policy CS19, warranting its protection as strategic gap.
34. The potential harm to the landscape setting of the settlements is covered by the Background Paper as described above. There would also be potential, over time, for development to lead to a significant narrowing of the undeveloped gap between the settlements, replacing attractive pasture land with buildings. This would harm the perceived separate identity and character of the settlements. It would be particularly clearly perceived from the railway platform and when travelling by train.
35. Gleeson Strategic Land refer to the “emerging spatial policy for the West of England Joint Spatial Plan” (the JSP going forward to 2036) and state that it says that “development is anticipated to take place generally to the West of Nailsea and Backwell”. Gleeson Strategic Land state that “in acknowledging how this area can play an important role in delivering much needed housing for Nailsea into the future and protect the perception of a gap”...the ACD Report “offers an analysis and suggestion as to how the perception of a gap between the settlements can be preserved”. However, as indicated above, the Council consider the very restricted strategic gap proposed in that report to be inappropriate. The JSP is considering land to the west, not to the south of Nailsea which can be delivered on land outside the proposed strategic gap.

(iii) Would it be necessary to amend the SG between Yatton and Congresbury if the need for a development of a medical centre within the SG was demonstrated?

36. If a need for a medical centre was demonstrated, in the first instance it would be assessed against Policy DM69 (Sites and Policies Plan Part 1 – Development Management Policies).

Proposals for sporting, cultural or community facilities within settlement boundaries will be permitted provided:

- the site is well related to the community it is intended to serve; and*
- the site is in a sustainable location, genuinely accessible by a choice of transport modes and to disabled people; and*
- the layout and design include features to facilitate combining other community needs within the same site unless this is agreed to be inappropriate; and*
- the proposal would not prejudice the living conditions of neighbouring properties.*

Facilities will only be permitted outside settlement boundaries where it is demonstrated that the scale, character or potential impact of the facility would be appropriate taking into account the above principles.

37. If these tests are met and a site in the strategic gap has been identified, then it would be for the decision maker to balance the strategic gap policy against the need for the medical centre, the chosen location and the form of development proposed. Even if permission for the medical centre was granted prior to adoption of Policy SA9, the Council would not recommend altering the proposed boundaries of the strategic gap between Yatton and Congresbury.
38. It has been suggested (by Cllr Leimdorfer in 936033//3) that policy SA9 should be reworded in such a way as to not preclude the possibility of a medical facility on a site which is in the proposed strategic gap.
39. The council does not consider it appropriate to amend the policy to allow certain types of development in strategic gaps, since strategic gaps are “to help retain the separate identity, character and/or landscape setting of settlements” (Core Strategy policy CS19), which all forms of built development could potentially affect. Also as indicated in the Background Paper, Appendix 1, paragraph 5.1, strategic gaps do not necessarily prevent development. Policy SA9 does not necessarily preclude development, but sets out the criteria against which development proposals would be assessed, taking account of siting and design.

Appendices: April 2017 35mm photos, and maps relating to the Nailsea/Backwell strategic gap

Photo 1 (below) Looking south towards Backwell from public open space at The Perrings, Nailsea; (north eastern most viewpoint on Map 1)



Photo 2 (below) Looking towards Backwell from public footpath at Morgan's Hill



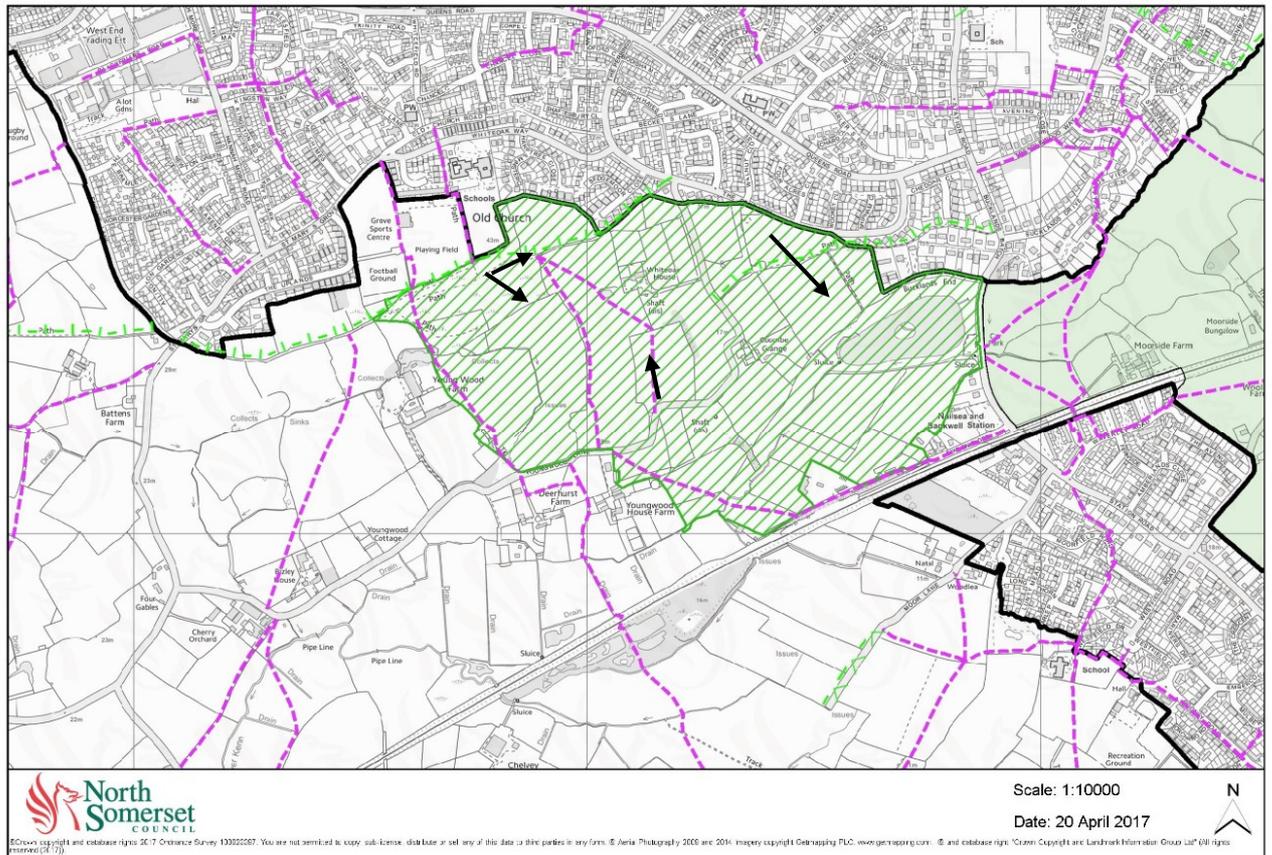
Photo 3 View of housing at Nailsea which is visible from same photo viewpoint as for photo 2; (intra-visibility)



Photo 4 Looking up towards the ridgeline on the southern edge of Nailsea, from Youngwood Lane; (southernmost viewpoint on Map 1)



Map 1: Proposed strategic gap (hatched green), public rights of way (purple or green dashes) and viewpoints for photos 1-4 above (arrowed)



Map 2: Fluvial flood zone 3B (Source: SFRA, on Earthlight)

