

Strategic Gaps

i) Appropriateness of Definition of Strategic Gaps in the Core Strategy

Role of policy

1. Policy CS19 is a broad Core Strategy policy which provides a hook for a more detailed development management policy on strategic gaps to be produced through the Sites and Policies DPD. The Plan Making Manual (CLG) states that “a core strategy must provide a strategic framework for any other development plan documents that the council may program. This helps target the delivery of core strategy objectives through subsequent development plan documents. It should also provide a framework for development management”.
2. The supporting text to policy CS19 (paragraph 3.241) lists areas which the Council feels are appropriate for investigation for possible strategic gap designation, through preparation of the Sites and Policies DPD. This list is not exclusive, and there may be other locations which are identified through the investigation process.
3. It is not intended to define the strategic gaps in the Core Strategy. Strategic gaps will appropriately be defined through preparation of the detailed Sites and Policies DPD, and shown on the Proposals Map when adopted.
4. Work on the Sites and Policies DPD is underway and preliminary work has been undertaken in defining the strategic gaps. North Somerset Council intend to produce a Consultation Draft version of the Sites and Policies DPD in Spring 2012.
5. It is not proposed to designate strategic gaps in the Green Belt. Some representations have argued that the strategic gaps designation is tantamount to Green Belt. This is not so. PPG2 (paragraph 1.4) indicates that the fundamental aim of Green Belt policy is to prevent urban sprawl, and paragraph 2.9 states that wherever practicable a Green Belt should be several miles wide, so as to ensure an appreciable open zone all around the built up area concerned.
6. The strategic gap designation does not have the purpose of preventing urban sprawl, but concerns protection of specific identified gaps between settlements or distinct parts of settlements for the purpose described below. The strategic gap designation is on a very different, much more localised scale than the Green Belt. Preliminary work so far suggests that

the widest strategic gap which is likely to be identified will only be about 1.1 km wide (between the settlements).

Purpose of policy

7. Policy CS19 and supporting text provides clear robust justification for protection of strategic gaps. The policy clearly states 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. Protection of the gaps will also reinforce local distinctiveness and a sense of place. This will be often be particularly apparent when passing from place to place, the gap reinforcing the sense of departure and arrival from a settlement.

Is the designation appropriate?

8. Paragraph 130 of the draft NPPF promotes protection of Local Green Space, green areas of particular importance to local communities. The criteria for their designation include reasonably close proximity to a centre of population or urban area, and not overlapping with Green Belt. In principle strategic gaps are broadly consistent with this concept. The strategic gaps to be defined in the Sites and Policies DPD will be subject to public consultation through preparation of that document.
9. Consultation on policy CS19 has already shown significant community support. All of the parish councils who commented on the policy at Consultation Draft stage (Congresbury, Dundry, Winford and Wrington) and those who commented at Publication stage (Portbury and Long Ashton) supported the policy in principle.
10. Strategic gaps is one of a number of policies relating to countryside and landscape issues which include other policies in the Core Strategy and other development plan documents. However policy CS19 is particularly important since the other countryside policies do not have its specific purpose and allow certain developments which mean there is a potential risk of adverse effects on the separate identity, character and/or landscape setting of the settlements or distinct parts of the settlements.
11. For example, and subject to the relevant policy's criteria, other policies allow developments such as tourist accommodation, tourist facilities and attractions, garden centres, nurseries and farm shops, residential care or nursing homes, and sites for gypsies and travellers. They allow scope for some development outside but on the edge of settlements, such as affordable housing, employment development such as B1-B8 uses and cultural and community facilities (like schools, colleges, hospitals health centres, halls, museums, indoor sports facilities, places of worship etc).
12. The risk of adverse impact is particularly significant given that incremental development could occur over time. There is also a greater risk, without a

strategic gaps policy, of development between the settlements being allowed on appeal.

13. Also other countryside policies would clearly be ineffective in protecting significant gaps within the limits of a settlement which are needed to protect the separate identity of distinct parts of the settlement.
14. For these reasons the protection provided by strategic gaps is important and appropriate for inclusion in the Core Strategy.

Should the strategic gaps be shown on the Core Strategy Key diagram or on an Inset Diagram?

15. It would not be appropriate or practicable to show strategic gap boundaries on the Core Strategy key diagram, which is diagrammatic and very small scale.
16. Strategic gaps are an important development management tool for which detailed boundary definition is important. To be meaningful strategic gaps would need to be defined in detail on the Proposals Map. As they are locally designated areas of protection this would be consistent with PPS12 paragraph 8.1.
17. Detailed boundaries are still being defined and will need to be subject to public consultation through the Sites and Policies DPD preparation process (along with a detailed development management policy). Such detail would be inappropriate for the Core Strategy and unnecessarily slow down its preparation, as implied by paragraphs 4.7 and 5.3 of PPS12.
18. It is also inappropriate to identify the gaps in the Core Strategy since, as described above, the possible list of locations is still being investigated, through the Sites and Policies DPD.

ii) Potential definition of Local Gaps in other DPDs

Is there a distinction between strategic and local?

19. The Council's position is that it is not appropriate to make a distinction between strategic and local gaps. All the gaps being investigated are locally designated areas of protection as referred to in PPS12 paragraph 8.1, so appropriate for definition through the Sites and Policies DPD as explained above.
20. To try to make a distinction between strategic and local gaps would be difficult, arbitrary and unnecessary. It would also tend to suggest that separate policies would be needed for each, which is not the case and likely to cause confusion.

21. The term strategic gaps is appropriate because, as explained in paragraph 1 above, Policy CS19 is part of the strategic policy framework for the district. It is appropriate that the policy is in the strategy since it helps set out how the strategy will be delivered, including its vision and objectives, consistent with PPS12 paragraph 4.1 and the Plan Making Manual. PPS12 paragraph 4.1 states that the Core Strategy should include an overall vision which sets out how the area and the places within it should develop. The visions set out in chapter 2 of the North Somerset Core Strategy (notably visions 1, 6 and 7) stress the importance of a distinct sense of place and of protecting the individual character of settlements, while the 7th priority objective (on page 20) specifically refers to protection of strategic gaps. Thus, as strategic gaps play an important role in helping to deliver the Core Strategy visions and objectives, and policy CS19 is an important part of the strategic policy framework, the use of the term 'strategic' gap is appropriate.