Matter 2

Policy LP10

Parish Clerk & RFO

Matter 2
LP10 Strategic Gaps

Summary

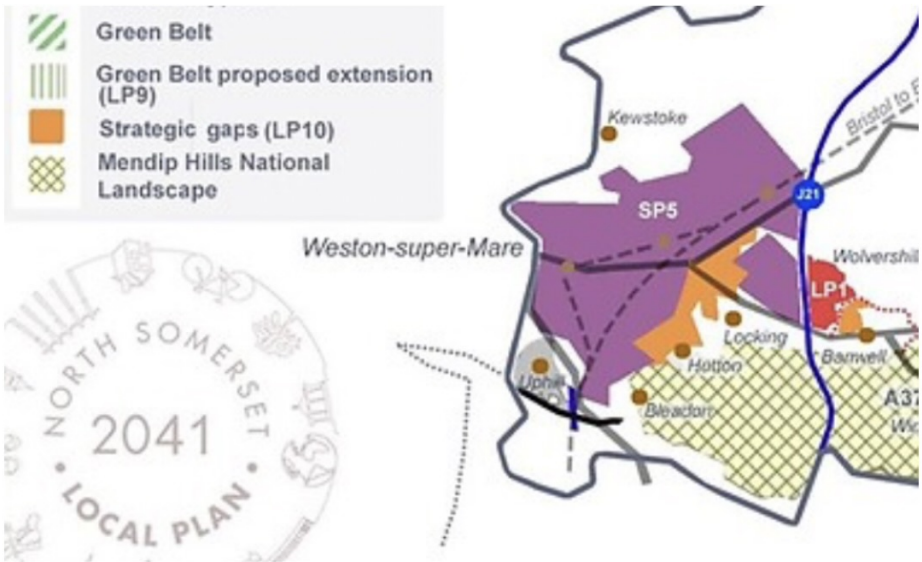
Bleadon Parish Council (BPC) is of the following opinion:

- The Plan is not considered to be sound
- The Plan is not legally compliant in respect of LP10
- BPC is unsure as to whether North Somerset Council has complied with the duty to co-operate

BPC has previously raised the need for a strategic gap to be introduced between the urban area of Weston-super-Mare and the rural parish of Bleadon. The LPA's response to this request has been predicated upon the view that such a requirement is not necessary due to the topography and geology of the local area. BPC is of the view that this opinion is unsafe and that assessment against the established criteria clearly warrants the requirement for a strategic gap.

Background and Local Context

Strategic gaps are already in place or proposed for other boundaries between the urban area of Weston-super-Mare and rural parishes. This is best illustrated by way of referencing an extract from the LPA's own 'Key Diagram' below. With the exception of the boundary between Weston-super-Mare and rural Bleadon, all of the other boundaries to the East/South-East of the urban area of Weston-super-Mare are the subject of strategic gaps (as highlighted in orange). Two of these areas – Locking and Hutton – are in the same District Ward as Bleadon.



Policy Context

North Somerset Council's (NSC) submission Local Plan 2041 sets out the following justification for the creation of Strategic Gaps. For ease of reference, these are separated into numbered points below:

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

   BPC response – Weston-super-Mare is one of the biggest towns in the country with district developments such as Worle in the 70s and 80s being amongst the biggest in Europe at that time. By contrast, the rural parish of Bleadon numbers some 600 properties and its origins date to the iron age with evidence of settlement dating back more than 2,000 years. Agriculture, farming and rural pursuits are features of parish life and the local economy, with significant parts of the parish being designated as sites of outstanding natural beauty or of special scientific interest. BPC is, therefore, of the opinion that there is a marked difference in the character and distinctiveness of the two settlements and a strategic gap is warranted.

2. *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 absence of a clear landscape harm. 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 on settlement identity and character.*

   BPC response – within its 'Strategic Gaps Background Paper' (November 2023), which the LPA has relied upon as part of its evidence base, the following statement (page 9) is made to justify why a strategic gap between the urban area of Weston-super-Mare and the rural parish of Bleadon:

   "… 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."

   BPC would wish to make the following points in respect of this statement:

   - There is a heavy reliance upon 'countryside policies' as justification for not requiring a strategic gap, despite a clear statement within the plan under consideration that such an approach would provide insufficient protection. Reliance upon designation of part of the area in question (to the East of the

urban area of Weston-super-Mare) as being within the Mendip Hills AONB is unsafe. The Mendip Hills National Landscape (the body responsible for the AONB) adopted a revised Management Plan in August 2026; the previous plan having expired in 2024. There was, therefore, a period of two years where a key document to be used by relevant LPAs in assessing planning applications was not in place. The parishioners of Bleadon should not be subjected to such vagaries – but should be protected through the adoption of a strategic gap.

Furthermore, the Management Plan which has been adopted does not offer the protection which would be afforded by the introduction of a strategic gap. The Management Plan mirrors the wording of the NPPF, which states that 'the scale and extent of development in National Landscapes should be limited'. 'Should' is not an absolute and the clear implication is that development is not specifically prohibited. The introduction of a strategic gap would offer greater protections and – in the context of the AONB – better reflect the spirit of the NPPF in terms of how it should be applied in respect of National Landscapes.

The area to the South of the urban area of Weston-super-Mare (the Bleadon levels) also falls within the rural Parish boundary. Although part of the levels form a Nature Reserve, the point made above in respect of the area of AONB would – to the Council – seem to be equally applicable in respect of the Bleadon Levels.

- The "relatively steeply sloping terrain" applies to only a portion of the boundary between the settlement areas. Bleadon Hill road for example, which is to the North of the main settlement area and serves as one of the routes between the urban conurbation and the rural parish, is relatively flat and the inclusion of land at Leighton Crescent for residential development is already clear evidence of potential ribbon development along a road - with such development being facilitated through the absence of a strategic gap.

  The reliance upon terrain being a barrier to development is unsound. There are many examples locally and nationally of building on sloping terrain – with many such developments commanding premium prices due to the views afforded. Indeed, most of the premium priced properties within the parish are built upon sloping terrain. The topography and geology of the Parish have not prevented construction using ancient methods. It is difficult, therefore, to accept that any natural barriers could not be suitably addressed using more modern construction methodologies.

- The language used within the justification for the decision undertaken in November 2023 is insufficiently robust. Words such as 'not likely', 'suggest' and 'could well be' are not absolutes. In the absence of such absolutes, then NSC should follow the justification it has set out in point 2 above i.e. it should not rely upon countryside policies and an assumed protection in relation to landscape to prevent development and instead designate a strategic gap.

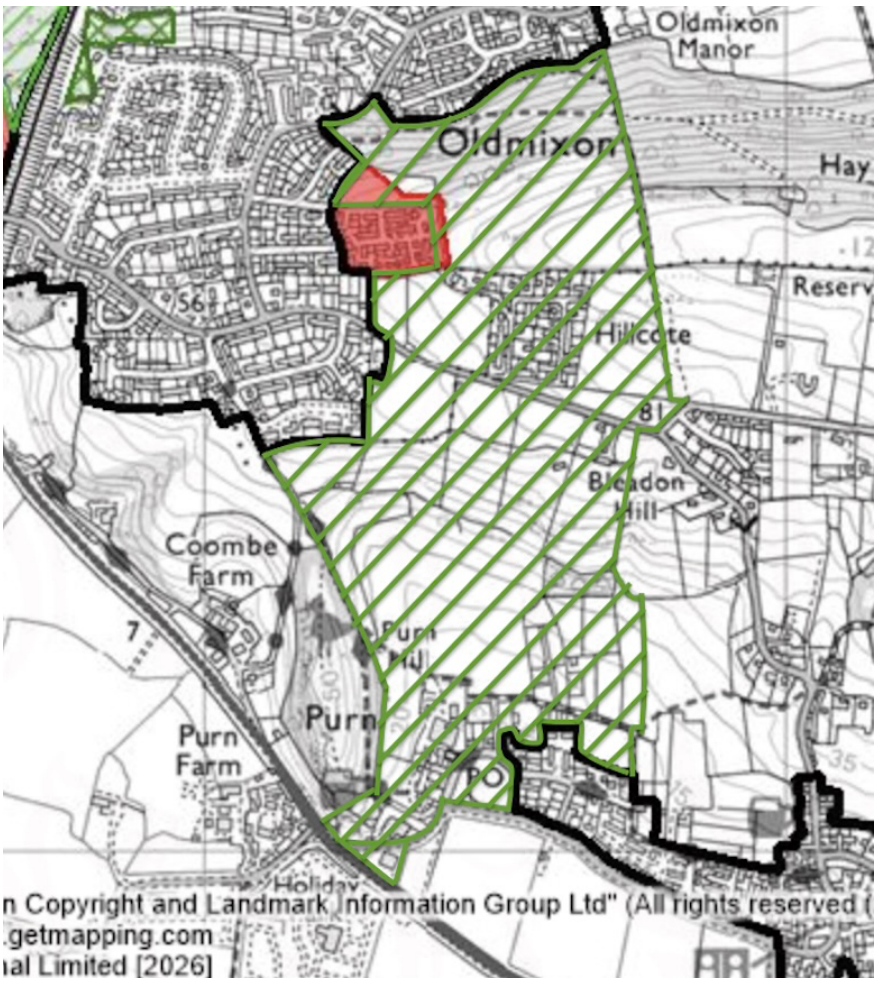
3. *Strategic gaps often include significant green infrastructure (GI) and are particularly useful in helping to protect GI close to settlements and their*

communities, giving them convenient proximity to all the potential benefits of GI. Such benefits include contribution to carbon storage, cooling and shading, sustainable drainage, natural flood risk management, and wildlife corridors. They can be attractive places for recreation and exercise, especially where crossed by public rights of way, with the added interest of biodiversity and natural beauty.

Bleadon Parish Council's (BPC) response – the proposed strategic gap incorporates areas of sustainable drainage, natural flood risk management, wildlife corridors, places for recreation and exercise (supported by extensive public rights of way), significant areas of biodiversity and natural beauty.

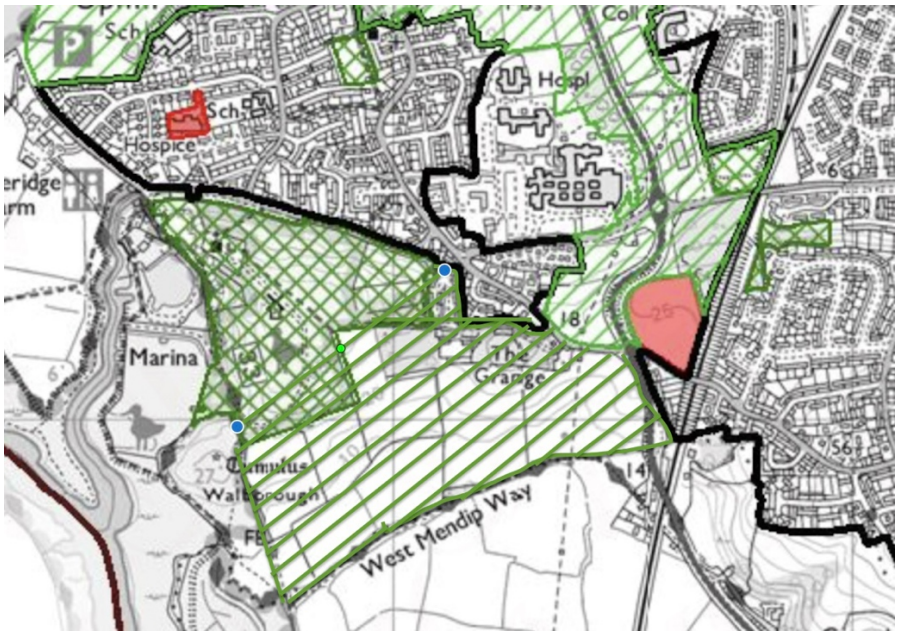
Proposed Location of Strategic Gaps

The Parish Council acknowledges that there will need to be more detailed discussion regarding the boundaries of any strategic gap. However, the Council is of the view that the strategic gaps should reflect that set out on the plans below.



As a consequence of the proposed strategic gap referenced above, the settlement boundary in relation to Weston-super-Mare would need to be redrawn to reflect the boundary in the current adopted Local Plan and the proposed housing allocation site at Leighton Crescent removed.

BPC supports the proposed strategic gap extending south from the hospital but is of the opinion that the gap should be extended further south to the point of the West Mendip Way and incorporate the Local Green Space designation to the south of Uphill. An extension of the boundary to the West Mendip Way would reflect the agreed parish and town boundaries (as agreed in the September 2026 boundary review).



Assessment Against NSC Criteria

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 were used to justify the strategic gaps forming the plan under consideration. 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)

What follows is BPC's assessment of the proposed strategic gap against the criteria.

1. Location of Land in relation to the settlements
   The proposed strategic gap logically falls between the proposed settlement limits of Bleadon and the existing settlement limits of Weston-super-Mare. The Parish Council recognises its limitations in terms of planning issues and that the actual curtilage of any strategic gap may need to be altered to reflect legislative or other requirements.

2. Sense of the gap
   There is a sense of the gap when leaving Bleadon along the A370 and encountering fields and other natural features either side of the road between the junctions of Bleadon Road and Devil's Bridge.

   There is a sense of the gap when leaving Bleadon along Bleadon Hill road and encountering fields either side of the road between the junctions of Roman Road and Leighton Crescent. This sense exists despite the fact that there is an intervening group of dwellings along that road between the settlements.

3. Sense of leaving or arriving at the settlement
   There is a sense of leaving Bleadon when travelling west along the A370 when one encounters uninterrupted fields to one side of the road and wooded areas to the other side of the road. There are a few isolated properties within the wooded area but these are largely set back from the road and in no way remove the sense that one has left Bleadon.





It is not until one reaches the cutting where the A370 snakes towards the hospital (point 3) that there is a strong sense of arriving at Weston-super-Mare.

There is a sense of leaving Bleadon when travelling West along Bleadon Hill road when one encounters uninterrupted fields to both sides of the road. There is a group of dwellings further west. However, these are only to one side of the road with one private road entrance and are heavily screened by mature hedgerow. The properties do not remove the sense that one has left Bleadon.



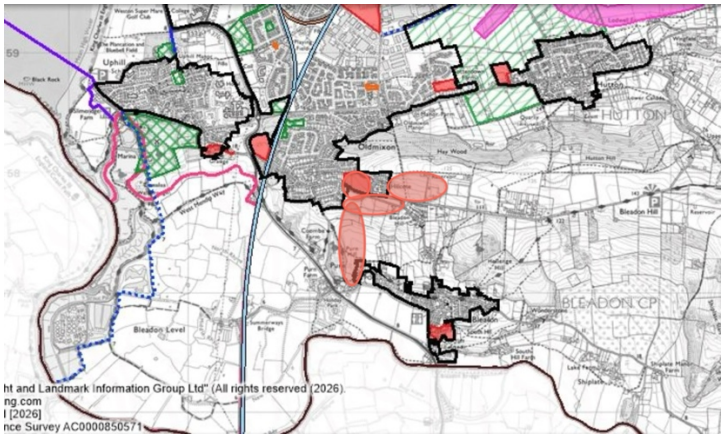




It is not until the road reaches a 'pinch point' (point 5) and narrows significantly with a long continuously developed road frontage that there is a strong sense of arriving at Weston-super-Mare.

4. <u>Sense of place, perception of the separate identity of settlements, actual and perceived proximity of the settlements</u>
   Perception of the separate identity of the settlements and their proximity is gained when travelling between them, but also from looking at the 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. Furthermore, the plan below shows the Parish Council's perception of the land which will likely be the subject of development pressure in the absence of a strategic gap. The Parish Council is of the view that development pressure will spread east along Bleadon Hill road to the junction with Roman Road and south down Purn Hill towards the current industrial estate on Purn Way.



5. <u>Landscaping setting of the settlements</u>
   There are attractive views from Bleadon Hill Road into countryside in the strategic gap, although these are not constant, being interrupted by the group of dwellings

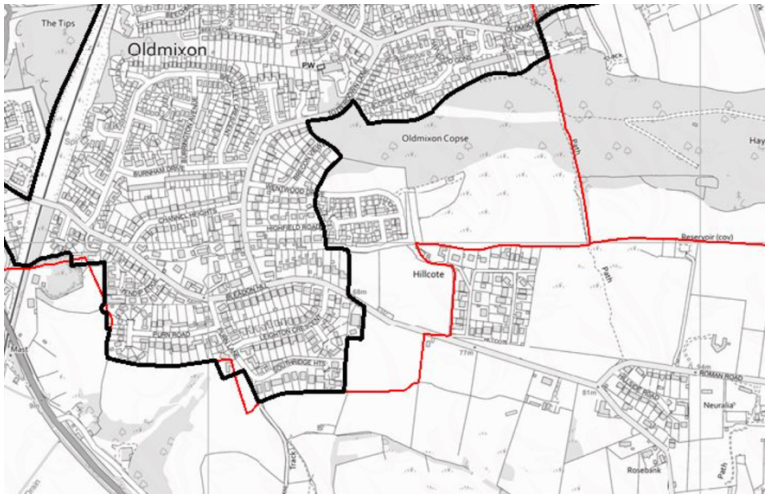
referred to above. The views allow appreciation of the topography, with the land falling down from Bleadon Hill Road to the village centre.

There are also views of fields and hedgerows from the A370 when leaving the village centre, and from public footpaths (PROWs) across the strategic gap.

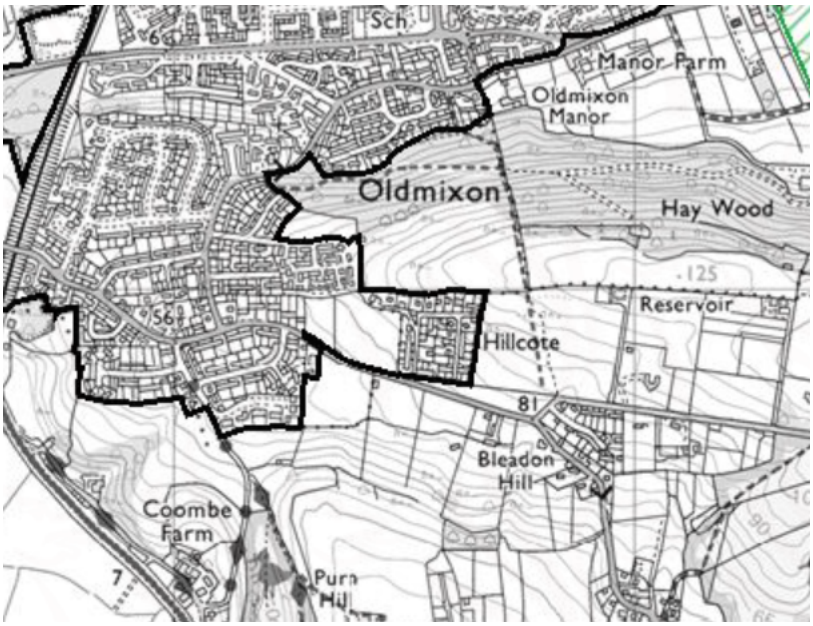
6. <u>Distance</u>

The shortest crow fly distance between the nearest parts of the settlements' limits across the strategic gap is about 500m diagonally from the southern point of Southridge Heights to the northern most point of the Purn Farm industrial estate.

North Somerset Council has chosen to propose expanding the settlement boundary of the Weston-super-Mare urban area and include the area of Hillcote within the revised settlement boundary, despite the fact that Hillcote is within the Parish of Bleadon. The plan below illustrates this poiny, with the existing WSM boundary (black) and existing parish boundary (red)

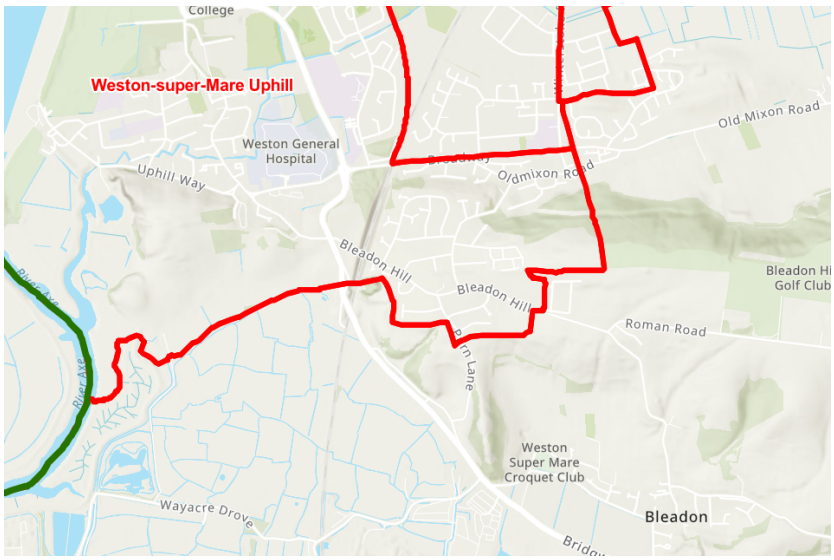


The LPA's proposed settlement boundary includes Hillcote as shown on the plan below:



It has further chosen to promote the inclusion of land adjacent to Leighton Crescent and effectively join the urban area of Weston-super-Mare with Hillcote. This is clearly ribbon development 'in action'.

The very recent boundary review (September 2026) did not support the position adopted by the LPA – instead recognising that there is a fundamental difference between the urban area of Weston-super-Mare and the rural parish of Bleadon (as shown on the plan below).



Based upon the current approved settlement boundaries, the distance between Hillcote and the boundary of Weston-super-Mare is approximately 80m. It should be noted that page 12 of the Strategic Gaps Background Paper states that "Such narrow gaps emphasise the risk of exacerbating ribbon development … and tendency towards coalescence of the settlements" and is used as justification for the creation of a strategic gap between Churchill and Sandford. Yet, the same standard has not been applied in respect of Bleadon Parish Council's request for a strategic gap.

7. <u>Topography</u>
   The topography of the strategic gap is initially gently sloping from Bleadon Hill Road, with a more pronounced slope as the gap abuts Purn Hill. The topography means that development of the strategic gap would be visible across fields from most locations within the village centre and from the A370 to the south.

8. <u>Vegetation</u>
   There are hedgerows bordering Bleadon Hill Road, some low enough to afford views of the fields in the strategic gap. Not all field boundaries include vegetation which restricts views. For example, there is little obstructive vegetation when viewing the strategic gap from the boundary of the village centre. That boundary largely comprises of open fields with views into 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 E1 Mendip Ridges and Combes Landscape Character Area (LCA). The SPD states that one of the negative impacts on the landscape has been '20th century infill and ribbon development … rising up Bleadon Hill to the west'.

   The landscape strategy is 'to conserve the peaceful, rural landscape with it semi-natural and ancient woodlands, open high pasture, ecologically rich grassland and heath, historic settlements and earthworks, and rural roads'.

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.

    Most of the strategic gap itself includes only a few dwellings at low density. The main exception is the Hillcote area where there are approximately 40 dwellings at a relatively low density.

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

In order to make the Plan legally compliant and sound, a strategic gap (or gaps) between the urban area of Weston- super-Mare and the rural Parish of Bleadon should be introduced. Assessment against North Somerset Council's established criteria for the designation of strategic gaps clearly supports this conclusion.