

ASSESSMENT OF LOCAL GAPS IN BREDON PARISH

Revised May 2016

1. Introduction

- 1.1 Bredon Parish Council has set out to identify areas along the connecting roads between settlements in the parish, which either serve as a rural buffer or a visual break helping to maintain the individual nature of a settlement, or which make a key contribution to the character of a settlement, or its rural setting. These will be designated as Local Gaps in the Bredon Parish Neighbourhood Plan, and given additional protection in recognition of the significant role they play.
- 1.2 The South Worcestershire Development Plan (SWDP) already designates some open land as 'Significant Gaps' under policy SWDP 2 D. However, the Reasoned Justification for this policy (point 8) makes clear that this designation is only intended to apply to buffers *separating smaller rural settlements from urban areas*¹. The Neighbourhood Plan seeks to apply the same principles *at a parish scale*.
- 1.3 The Parish Council together with the Bredon Parish Neighbourhood Plan Group has prepared this assessment to create a consistent and transparent methodology for evaluating potential Local Gaps. It forms part of the Evidence Base which has informed the production of the Neighbourhood Plan.
- 1.4 This assessment establishes three tests which potential sites must pass in order to qualify as Local Gaps. It also demonstrates how each of the sites identified in the Bredon Parish Neighbourhood Plan 'Submission Version' (May 2016) satisfies these tests.

2. Policy Background

National Planning Policy

- 2.1 The National Planning Policy Framework (NPPF) §17 sets out twelve core land-use planning principles. Three of these have relevance for the purpose of identifying Local Gaps under the neighbourhood planning framework.
 - Bullet 1 – planning should be genuinely plan-led, empowering local people to shape their surroundings, with succinct local and neighbourhood plans setting out a positive vision for the future of the area.
 - Bullet 5 – planning should take account of the different roles and character of different areas... recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it.
 - Bullet 6 – planning should contribute to conserving and enhancing the natural environment and reducing pollution...
- 2.2 NPPF §109 states that the planning system should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes.
- 2.3 NPPF §183 states that neighbourhood planning gives communities direct power to develop a shared vision for their neighbourhood and deliver the sustainable development they need. Parishes and neighbourhood forums can use neighbourhood planning to set planning policies through neighbourhood plans to determine decisions on planning applications.

¹ SWDP 2 defines 'Urban Areas' as being Worcester, Droitwich Spa, Evesham, Malvern, Pershore, Tenbury Wells and Upton-upon-Severn.

- 2.4 NPPF §184 states that neighbourhood planning provides a powerful set of tools for local people to ensure that they get the right types of development for their community. The ambition of the neighbourhood should be aligned with the strategic needs and priorities of the wider local area. Neighbourhood plans must be in general conformity with the strategic policies of the Local Plan. Neighbourhood plans should reflect these policies and neighbourhoods should plan positively to support them. Neighbourhood plans and orders should not promote less development than set out in the Local Plan or undermine its strategic policies.
- 2.5 NPPF §185 establishes that outside these strategic elements, neighbourhood plans will be able to shape and direct sustainable development in their area. Once a neighbourhood plan has demonstrated its general conformity with the strategic policies of the Local Plan and is brought into force, the policies it contains take precedence over existing non-strategic policies in the Local Plan for that neighbourhood, where they are in conflict.

Local Planning Policy

- 2.6 The South Worcestershire Development Plan (SWDP) was adopted on 25th February 2016. This is the 'local plan' which is used to determine planning applications in the three local planning authority areas it covers – Wychavon District, Malvern Hills District, and Worcester City. It sets out the basic rules which new development must follow, as well as allocating certain areas of land for new housing or employment.
- 2.7 Policy SWDP 2 (Development Strategy and Settlement Hierarchy) sets out the principles which should apply to new development in south Worcestershire. It also establishes a Settlement Hierarchy which steers future windfall development away from the open countryside and towards larger more sustainable settlements.
- 2.8 SWDP Annex D (Settlement Hierarchy) identifies Bredon as a Category 1 Village. Category 1 Villages are in rural areas, and new development will predominately be aimed at meeting locally identified housing and employment needs.
- 2.9 The remaining settlements in the parish are identified as being in Lower Categories. Lower Category Villages are defined as being in rural areas, and their role in providing additional future development is limited. Bredon's Norton is placed in Category 4A; Bredon's Hardwick, Kinsham, Lower Westmancote and Westmancote are placed in Category 4B.
- 2.10 Policy SWDP 59 (New Housing for Villages) allocates land for 24 homes off Oak Lane, Bredon – predominately aimed at meeting locally identified housing need.
- 2.11 Policy SWDP 2 D requires that development proposals should ensure the retention of the open character of the Significant Gaps. 'Significant Gap' is defined in the SWDP Glossary as a local planning designation intended to protect the settings and separate identities of settlements by:
- helping to avoid coalescence;
 - retaining the existing settlement pattern through maintaining the openness of the land; and
 - securing the quality of life benefits of having open land close to where people live.
- 2.12 The Reasoned Justification for policy SWDP 2 D states that the purpose of maintaining Significant Gaps, which either serve as a buffer or visual break between rural settlements and adjacent urban areas² or protect the character and setting of settlements, is to provide additional protection to open land that may be subject to development pressures. The designation helps to maintain a clear separation between smaller settlements and urban areas in order to retain their individual identity.

² SWDP 2 defines 'Urban Areas' as being Worcester, Droitwich Spa, Evesham, Malvern, Pershore, Tenbury Wells and Upton-upon-Severn.

- 2.13 In order to satisfy NPPF §184, any policy in the Neighbourhood Plan, including the policy relating to Local Gaps, must be in general conformity with the strategic policies of the local plan.

3. Criteria for assessing Local Gaps

- 3.1 Wherever feasible, physical boundaries have been used to define Local Gaps. However, where no suitable boundary exists, other features have been used to demarcate the area, such as a line created by extending a neighbouring boundary.
- 3.2 Large areas of native woodland have been excluded from potential Local Gaps as these are sufficiently protected under specific SWDP and Neighbourhood Plan policies. Land falling within the Cotswolds AONB has been included where it is considered that AONB designation may not of itself give sufficient protection to important gaps.
- 3.3 To ensure consistency of approach across the parish, three tests have been devised for identifying Local Gaps. To qualify for designation, each area should satisfy Test 1, as well as satisfying either Test 2 or Test 3.

Test 1. Does any land in the proposed Local Gap already have planning permission, or has it been allocated for development in the SWDP?

- The first stage in the assessment will be to review the planning history of each area to ensure that it is not subject to an extant planning permission, and that it has not been allocated for development under a local plan.
- The Local Gaps designation will rarely be appropriate where land already has planning permission, or where it has been allocated for development under the local plan.
- An exception to this may be where it can be demonstrated that the Local Gap designation would be compatible with the planning permission / local plan allocation, or where the planning permission / local plan allocation is no longer capable of being implemented.

Test 2. Does the area play an important role as a buffer preventing coalescence between settlements, and if so, could this role be significantly harmed by development?

- An area could qualify for designation as a Local Gap if it played an important role as a buffer preventing coalescence between settlements, and if this role could be significantly harmed by development.
- Coalescence is the growing together of settlements. This frequently takes the form of ribbon development along main roads between neighbouring settlements. The merging of settlements is often accompanied by a loss of individual identity: instead of being experienced as a community in its own right, a settlement may be regarded as a neighbourhood or suburb of a larger combined entity.
- In evaluating the importance of an area's role as a buffer, consideration should be given as to how much open space currently exists between settlements. Where little open space remains between settlements, its designation should be prioritised.
- Consideration should also be given to the quality of the remaining open space. A significant stretch of undeveloped land will be more effective at preventing coalescence than land punctuated by built forms.
- In determining if development would significantly harm an area's ability to act as a buffer, account should be taken of how even low levels of development can bring about changes in the way an area is experienced. For example, a few dwellings, modern agricultural barns, holiday caravans or equine structures can in some situations fragment the sense of uninterrupted open countryside, and create the experience of a sub-urban rather than a rural landscape.

- Account should also be taken of the fact that large settlements tend to exert greater effects on their hinterlands than small ones. The impacts of noise, litter, light pollution, traffic and incidental development tend to extend further from large settlements than from small ones. Larger settlements may therefore require larger buffers than smaller ones in order to prevent a sense of coalescence.

Test 3. Does the area make an important contribution to the character or rural setting of a settlement, and if so, could this be significantly harmed by development?

- An area could qualify for designation if it made an important contribution to the character or rural setting of a settlement, and if that contribution could be significantly harmed by development.
- Contributions to character or rural setting might include helping to create an attractive rural backdrop for a key approach to the settlement, or providing important views into or out of the settlement or its environs.
- Harms might include the interruption of views, or a reduction in the sense of rural isolation.
- In determining harms to the character or rural setting of a settlement, account should be taken of how even low levels of development can bring about changes in the way an area is experienced in certain contexts. For example, a single dwelling, modern agricultural barn or equine complex on open land can fragment a sense of rural isolation deriving from uninterrupted countryside.
- Account should also be taken of the effects of incidental development such as gardens, lighting, vehicle splays and signage. For example, the planting of alien coniferous trees or shrubs around new dwellings can have a powerfully suburbanising effect in a rural location.

4. Consultation

- 4.1 This assessment is published on Bredon Parish Council's website as part of the Neighbourhood Plan Evidence Base, where it can be viewed and commented on by all those taking part in consultations on the Neighbourhood Plan.
- 4.2 The views of parish residents and external organisations were sought through the consultations on the Pre-Submission Plan (October 2015) and the Revised Pre-Submission Plan (March 2016), including those of Wychavon District Council, the Cotswolds Conservation Board, and Worcestershire County Council.
- 4.3 The Parish Council invited all known landowners to make representations about proposals to designate any part of their land as Local Gaps. Wherever land was registered at the outset of the consultation on the Revised Pre-Submission Plan, landowners were written to at the address held by the Land Registry.
- 4.4 In the light of responses received from consultees, the Parish Council revised the criteria for assessing Local Gaps, and reviewed each proposed area according to the updated criteria. Some adjustments were made to Local Gaps as a result of the review process.

5. Areas identified as Local Gaps

- 5.1 Table A below provides information about each of the five areas identified as Local Gaps in the Bredon Parish Neighbourhood Plan 'Submission Version' (May 2016). These have each been assessed against the three tests set out above.

TABLE A: Assessment of Local Gaps identified in the Bredon Parish Neighbourhood Plan (Submission Version)

Map #	Location of Local Gap	Description of Local Gap	Overall area (Ha)	Area of farmland (Ha)	Overall length of road frontage	Maximum stretch of frontage with unbroken country -side on both sides of road (no buildings, etc.)	TEST 1 existing planning permission or SWDP allocation	TEST 2 importance of area's role as a buffer preventing coalescence between settlements; & extent this role could be harmed by development	TEST 3 contribution to settlement's character or rural setting; & extent to which this could be harmed by development
GAP1	Lower Westmancote to Kemerton (Kemerton Road) & Lower Westmancote to Westmancote (Westmancote lane)	<p>The area spans Kemerton Road and Westmancote lane.</p> <p>North of Kemerton Road, the land consists of arable land and pasture. It is open in character and lies within the AONB. It provides views across the lower slopes of Bredon Hill.</p> <p>South of Kemerton Road, the land consists of deciduous woodland. It lies outside the AONB.</p> <p>East and west of Westmancote lane, the land consists of arable land and pasture. It is open in character and lies within the AONB. It provides long views to the Cotswolds escarpment and to the Malvern Hills.</p>	9.3	1.4	200 m & 170 m	90 m & 160 m	No	<p>The area acts as an essential buffer preventing coalescence between the three settlements.</p> <p>Only a very small amount of undeveloped frontage remains (maximum extent 90 m) on both sides of Kemerton Road between Lower Westmancote and Kemerton.</p> <p>Only a small amount of undeveloped frontage remains (max 160 m) on both sides of the lane between Westmancote and Lower Westmancote.</p> <p>Even a limited amount of new development in this gap would have a significant detrimental impact. The villages currently almost merge. The loss of any further open land would lead to coalescence, so that it would no longer be possible to determine by visual means alone where one village ended and another began.</p>	<p>The open land at the entrances to the villages contributes significantly to their character and rural setting.</p> <p>The frontage between Lower Westmancote and Kemerton provides important countryside views northwards towards Bredon Hill, highlighted in the Bredon Village Design Statement (VDS).</p> <p>The frontage between Lower Westmancote and Westmancote provides important views over farmland to the Malvern Hills and the Cotswold escarpment.</p> <p>WCC Landscape Character Assessment Supplementary Guidance identifies strongly nucleated settlements as the primary key characteristic of the landscape type Principal Village Farmlands, and seeks to "retain the pattern of strongly nucleated villages with associated low dispersal of settlement between".</p> <p>VDS Sections 4.3 and 5.1.3 highlight the particular importance of preserving the remaining open countryside between Bredon, Westmancote and Kemerton so that the individual character of settlements is not lost.</p> <p>Development in this gap would harm the character and rural setting of the villages through loss of countryside in a key location. It would lead to a loss of individual identity through merger.</p>

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GAP2	Bredon to Lower Westmancote (Kemerton Road)	<p>The area spans Kemerton Road. It chiefly consists of arable farmland and private allotments; also some pasture, woodland, and a small amount of residential curtilage.</p> <p>North of the Kemerton Road surrounding Moretons Farmhouse, the land has an open aspect and is bordered by hedgerows.</p> <p>South of the road, remnants of former market garden allotments and orchards create a more fragmented and treed landscape.</p>	23.0	5.9	440 m	150 m	No	<p>The area acts as an essential buffer preventing the coalescence of Bredon and Lower Westmancote.</p> <p>Only a small amount of undeveloped frontage remains (maximum extent 150 m) on both sides of Kemerton Road between Bredon and Lower Westmancote.</p> <p>Even a limited amount of new development in this gap would have a significant detrimental impact. The villages currently almost merge. The loss of any further open land would lead to coalescence, and it would no longer be possible to determine by visual means alone where one village ended and another began.</p>	<p>The open land at the entrances to the villages contributes significantly to their character and rural setting.</p> <p>At the Lower Westmancote end, the gap contains traditional orchard and allotment strips, both of which have important cultural associations locally, as well as being important for their visual amenity. Horticulture and fruit growing were the dominant land uses around Bredon until mid-C20th - made famous by the local author John Moore.</p> <p>The Moretons, located north of Kemerton Road, is a rare surviving example in the parish of a typical farmstead dating from the period following Inclosure (1811).</p> <p>VDS Section 3.7 highlights key views over farmland towards the Malvern Hills and Bredon Hill.</p> <p>WCC Landscape Character Assessment Supplementary Guidance identifies strongly nucleated settlements as the primary key characteristic of the landscape type Principal Village Farmlands, and seeks to "retain the pattern of strongly nucleated villages with associated low dispersal of settlement between".</p> <p>VDS Sections 4.3 and 5.1.3 highlight the key role of the remaining open countryside between Bredon and Westmancote in preserving the individual character of the villages.</p> <p>Development in this gap would harm the rural character of both villages and lead to a loss of individual identity through merger.</p>

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GAP3	Bredon to Kinsham (B4079)	<p>The area lies west of Cheltenham Road (B4079) between Kinsham and Bredon (the east side forms part of Kemerton Wood and is therefore excluded). It chiefly consists of arable farmland and pasture, bordered by hedgerows, with an open character.</p> <p>The north end of the gap contains farm buildings, former market garden allotments, traditional orchards (some protected by a TPO) and two dwellings.</p>	15.6	10.9	700 m	410 m	No	<p>This area acts as an important buffer preventing the coalescence of Bredon and Kinsham.</p> <p>Only a limited amount of undeveloped frontage remains (maximum extent 410 m) on both sides of Cheltenham Road between Kinsham and Bredon.</p> <p>The area is interrupted by a group of farm buildings and dwellings south of Bensham Orchard.</p> <p>Further fragmentation of the gap through development would harm its role as a buffer and increase the sense that the two villages were part of a larger settlement continuum.</p>	<p>The remaining open land at the entrances to Bredon and Kinsham makes an important contribution to the character and rural setting of both villages.</p> <p>At the Bredon end, it contains strips of traditional orchard and allotment, both of which have important cultural associations locally, as well as being important for their visual amenity (as confirmed by Appeal decision APP/H1840/A/ 14/2217607). Horticulture and fruit growing were the dominant land uses around Bredon until mid-C20th - made famous by the writer John Moore in his best-selling 'Brensham trilogy'.</p> <p>At the Kinsham end, the gap provides important views from Cheltenham Road over farmland towards the Malvern Hills.</p> <p>At the Bredon end, the gap provides important views into the orchards at Bensham and Upstones from Cheltenham Road and from Footpath BX-527 in Kemerton Wood.</p> <p>WCC Landscape Character Assessment Supplementary Guidance identifies strongly nucleated settlements as the primary key characteristic of the landscape type Principal Village Farmlands, and seeks to "retain the pattern of strongly nucleated villages with associated low dispersal of settlement between".</p> <p>Given the sensitivity of the landscape, even limited development in this gap would harm the character and rural setting of both villages.</p>

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GAP4	Bredon to Bredon's Hardwick (B4080)	<p>The area spans Tewkesbury Road (B4080) between Bredon and Bredon's Hardwick. It is bisected by the M5 motorway embankment, who's bulk, noise and visually intrusive character dominates the otherwise rural landscape.</p> <p>North of the M5, the gap chiefly consists of arable farmland and pasture, with an open character. Here it forms part of the setting of Bredon Barn and St Giles Church (whose tower is prominently visible from much of the gap).</p> <p>South of the M5, the area chiefly consists of pasture with an open character. There is a large traditional orchard north of Carron Farm. A business premises is located at the entrance to Fleet Lane.</p>	34.8	31.1	1,130 m	<p>230 m (north of M5)</p> <p>&</p> <p>310 m (south of M5)</p>	No	<p>The remaining open land acts as an important buffer preventing coalescence between Bredon and Bredon's Hardwick.</p> <p>Only a small amount of undeveloped frontage remains (maximum extent 230 m) on both sides of Tewkesbury Road between Bredon and the M5 embankment</p> <p>Only a small amount of undeveloped frontage remains (maximum extent 310 m) on both sides of Tewkesbury Road between Fleet Lane and Bredon's Hardwick.</p> <p>The sense of open countryside between the two villages is severely curtailed by the presence of the M5 embankment. Due to its bulk, noise and visually intrusive character, the M5 significantly reduces the area which is able to act as a rural buffer between settlements.</p> <p>Development in this gap would harm its role as a buffer, and increase the sense that the two villages were coalescing.</p>	<p>The open farmland at the entrance to Bredon makes a very important contribution to its character and rural setting. In particular, much of it provides the rural setting and historical context for St Giles's Church and Bredon Barn (both Grade I listed), as confirmed by Appeal decision APP/H1840/A/14/2222679, citing English Heritage evidence.</p> <p>The open land south of the M5 contributes significantly to the character and rural setting of Bredon's Hardwick. It is located in a visually prominent position at the main northern entrance to the village and mainly comprises farmland and traditional orchard.</p> <p>Traditional orchards have important cultural associations locally, as well as being important for their visual amenity. Horticulture and fruit growing were the dominant land uses around Bredon until mid-C20th - made famous by the writer John Moore in his best-selling 'Brensham trilogy'.</p> <p>WCC Landscape Character Assessment Supplementary Guidance identifies strongly nucleated settlements as the primary key characteristic of the landscape type Principal Village Farmlands, and seeks to "retain the pattern of strongly nucleated villages with associated low dispersal of settlement between".</p> <p>Even limited development in this gap would cause significant harm to the character and rural setting of Bredon and Bredon's Hardwick.</p>

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GAP5	Bredon's Hardwick to Tewkesbury (B4080)	<p>The area spans Tewkesbury Road (B4080) between Bredon's Hardwick and Tewkesbury (Mitton). It chiefly consists of pasture, with an open character.</p> <p>There are large agricultural buildings close to the north and south ends of the area. Mitton Lodge and public allotments are located close to the south end.</p> <p>Tewkesbury Road is lined with mature hawthorn hedges which are an attractive feature. There are extensive views through and under the hedges (especially Nov-Apr) across the Avon and Severn vales.</p>	59.1	45.9	1,610 m	730 m	No	<p>The remaining open land acts as an important buffer preventing coalescence between the Tewkesbury urban area and Bredon's Hardwick.</p> <p>The Tewkesbury urban area had a population of approximately 20,000 in 2011. This is set to rise to nearly 30,000 under the Gloucester Cheltenham Tewkesbury Joint Core Strategy (JCS). As noted in the JCS evidence base, Tewkesbury town exerts a strong influence over its hinterland.</p> <p>Only a fairly limited amount of undeveloped frontage remains (maximum extent 730 m) on both sides of Tewkesbury Road separating Bredon's Hardwick from the Tewkesbury urban area.</p> <p>The remaining frontage is fragmented by sporadic development, including large modern agricultural barns and the Mitton Lodge complex.</p> <p>Further fragmentation of this gap through development would harm its role as a buffer, and increase the sense that Bredon's Hardwick formed part of the Tewkesbury urban area.</p>	<p>The open pastureland on either side of Tewkesbury Road at the main southern approach to Bredon's Hardwick contributes significantly to the character and rural setting of the village.</p> <p>The gap gives rise to spectacular views across the Severn and Avon Vales to the Malvern Hills, as highlighted in the VDS.</p> <p>WCC Landscape Character Assessment Supplementary Guidance identifies strongly nucleated settlements as the primary key characteristic of the landscape type Principal Village Farmlands, and seeks to "retain the pattern of strongly nucleated villages with associated low dispersal of settlement between".</p> <p>The size of the Tewkesbury urban area has been noted in Test 2. A significant stretch of open countryside is required along Tewkesbury Road to ensure that Bredon's Hardwick maintains its character as an independent rural settlement.</p> <p>The large modern agricultural barns at Gellesters Farm and Hardwick Bank provide a stark illustration of how even agricultural development can have an urbanising effect on the landscape and bring about a significant reduction in open rural character.</p> <p>Even limited development in this gap would cause significant harm to the distinct character and rural setting of Bredon's Hardwick.</p>