



South Worcestershire Development Plan Review (SWDPR) Preferred Options: Significant Gaps Appraisal.

1. Purpose of the Appraisal

- 1.1. To assess the planning merits of the current SWDP Significant Gaps (SG) and, in cases where it is considered there is insufficient planning justification to retain an SG, recommend its deletion. NB: There are likely to be instances, e.g. the master-planning of new/expanded settlements, whereby new Significant Gaps could be justified, but that is not within the remit of this document.

2. Background

- 2.1. Currently, the Significant Gaps policy, i.e. SDWP2D, reads “Development proposals should ensure the retention of the open character of the Significant Gaps”. All the Significant Gaps are shown on the SWDP Interactive Policies Map. Their scale is very variable (on account that their origins varied between the former Malvern Hills and Wychavon district Local Plans and there was no overarching policy statement as to why they were first designated), e.g. the extensive SGs between Worcester South (SWDP 45/1) and Kempsey, the SG to the east of M5 at Worcester in Malvern Hills District versus the very small SGs at Hinton-on-the-Green, Lenchwick/Norton, Pebworth, Pinvin etc in Wychavon District.
- 2.2. At the SWDP examination the SG policy did not receive significant attention despite it being, in effect, a local designation for which the National Planning Policy Framework (NPPF) is silent (and remains so in the 2019 version). Notwithstanding that, the examination inspector considered the policy sound. There are a number of Call for Sites (CfS) submissions that lie within an SG, in particular, large areas of SG to the south of SWDP 45/1 (Worcester South) and to the west of SWDP 45/2 (Worcester West), so it is likely that SGs and associated policy will come under greater scrutiny in the examination of the SWDPR
- 2.3. Consequently, a review of the planning merits of the current SGs is considered necessary. The high level questions are:
 - What purpose are they serving?
and,

- Are they necessary?

2.4. The Purpose of Significant Gaps

2.4.1. Similar to the primary purpose of Green Belt policy, the principal function of SG policy is to keep land open (Nb. not necessarily completely free of development) in order to prevent neighbouring developments from coalescing and to provide an appropriate setting for settlements.

2.5. Are the Specific Significant Gaps Necessary?

2.5.1. The underlying overarching presumption is that it is good planning practice to keep settlements separate if at all possible (of course, eventually some will have to merge if more and more development needs to be accommodated/planned for in a given area) in order to retain their individual identity. The following are matters to be considered pertinent in reviewing the current SGs:-

- The importance of the (open) gap. Is it obvious that, without it development is likely to occur leading to coalescence?
- Is the extent of the current SG necessary? Could physical openness and visual openness be maintained / achieved with a reduced gap? (A Local Plan examination inspector will almost certainly pose that question as it is also pertinent to Green Belt boundary considerations.)
- Would the land remain largely open if there was no SG policy designation? Without a SG policy for most development types one would be relying on the development boundary policy (currently SWDP2C) to control development and it clearly permits, in principle, more types of development than SWDP2D does. (It could be argued that currently SWDP2D is more onerous than SWDP2E (Green Belt), as the latter defaults to the NPPF (2019), which allows certain types of development to be permitted even if they might reduce openness to a degree.) So currently, for example, one of the SGs at Beckford is in Flood Zones 3a and 3b, so vulnerable built development, such as housing is highly unlikely to secure planning permission even on appeal.
- Scale: This is of course not a precise science rather, generally speaking, the smaller the current SG, the greater the likely impact of built development on its openness.
- Between or within settlements: The SWDP contains a mix, although the majority are to keep neighbouring settlements from merging. The SGs at Beckford, Pebworth, Upton Snodsbury and Whittington lie between separate built up areas within the settlement (**NB** Not necessarily within the settlement's development boundary). It could be argued that a continuation of open space and Conservation Area policies would have the desired effect of keeping the land open.
- Public accessibility: It is easier to justify an SG if it straddles a main road, railway etc, as visual perception is an important factor i.e. the more

enclosed the affected land is the less the justification for a SG.

- Development pressure: Over and above planned development, is the SG in an area likely to be the subject of speculative planning applications (the CfS gives a clear indication of this)?

3. Planning Appraisal of Current SWDP Significant Gaps

3.1. See appraisal table overleaf.

Significant Gap	Purpose	Within a settlement?	Are there other policy restrictions (please state) which would keep the land open?	Could the SG be reduced in extent whilst retaining its purpose?	Is the SG visible from a public place?	Are there Call for Sites within it/them?	How likely is/are a planning application(s) to be submitted?	Is the scale of the SG significant in the context of the SWDP and SWDPR?	Recommendation (retain / revise / remove)
Beckford (North)	Separates two built up area of Beckford	Yes	Yes SWDP28- Management of Flood Risk the land is not in Flood Zone 1 and there is also a Conservation Area(SWDP 6,24) to the north; Land beyond the development boundary so housing development here would be contrary to SWDP2C	The SG is very small with clear inter-visibility.	Yes from Back Lane and PRWs	Yes	Possible given the CfS submissions but planning permission highly unlikely given the degree and extent of the flood risk	No	Remove. SWDP policies on flood risk and Conservation Areas and Open Countryside should keep the land open.
Beckford (South)	Separates Beckford from Little Beckford to the south	No	The land lies beyond a development boundary so housing development here would be contrary to (SWDP2C.	The SG is very small with clear inter- visibility	Yes A46(T) and the main road through the village	No	Unlikely given juxtaposition with the A46(T)	No	Remove. The A46(T) provides a clear separation between Beckford and Little Beckford separation . The SG only provides a limited setting for Beckford.
Crowle-Crowle Green	Separates Crowle from Crowle Green to the north.	No	The land lies beyond the development boundaries for Crowle and Crowle Green so market housing development would be contrary to SWDP2C. The southern end of the SG abuts the Conservation Area for Crowle and the likelihood is that development there would have a detrimental impact on the setting of the CA and therefore could be contrary to SWDP6 and SWDP24	Very limited scope given the small distance between opposing development and inter-visibility would increase substantially.	Yes from both Church Road and a Public Right of Way	Yes	Possible given the CfS submission	No	Remove. The Open Countryside policy and the juxtaposition with the Conservation Area means that any market housing led proposal would be refused and likely to unsuccessful on appeal.
Droitwich Spa	An extensive tract of open land which separates the main built up area of Droitwich from Doverdale Residential Park and the industrial estates of Hampton Lovett and Stonebridge Cross	No	The River Salwarpe passes through it so some land is medium flood risk and some is high flood risk both of which are inappropriate for residential development.	No	Yes the A442	Yes	Part of the land is subject to a planning appeal	Locally significant in the context of Droitwich Spa. Nb The land is the subject of a formal planning appeal in October.	On balance retain to be consistent with the approach for Evesham below
Evesham- Hampton	Separates two distinct districts of the town within an overall development boundary	Yes	The River Isbourne runs though it such that some of the land is high flood risk	No	Yes	Yes	Possible given CfS submissions and that generally speaking it is a relatively sustainable location for development	Fairly extensive tract of land separating Hampton form Evesham so locally significant.	Retain
Hinton-on-the-Green	Separates two urban elements of the village.	Yes	Yes- SWDP2C, SWDP28	The SG is small with some intervisibility between the 2 built up areas	Yes Bevons Lane	Yes, within the very large (new settlement bid?) CfS submission centred on Hinton	Possible given the CfS submissions albeit there are far more likely candidates nearby.	No	Remove. The other policy restrictions means that development proposals are highly unlikely to be acceptable and in any event the

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									topography does not lend itself to built development.
Leigh Sinton	Separates Leigh Sinton from Malvern	No	Yes-SWDP2C	Limited reduction only(on the southern edge of Leigh Sinton)	Yes from a number of public roads and PRWs along with the railway	Yes, at the northern and southern edges.	Possible given the developer interest.	Yes	Retain with the possible exception of a few discrete land parcels on the edge of Leigh Sinton should they be needed i.e. allocations in either the SWDPR or Leigh Sinton Neighbourhood Plan.
Lenchwick, Norton	Separates Lenchwick from Norton	No	Yes- SWDP2C and SWDP6/24 as the northern edge of the SG abuts the Norton Conservation Area	No the SG is very small with strong inter-visibility	Yes, Norton Road abuts the southern edge.	No	Possible as some developers may, wrongly, consider it infill.	No	Remove on account of other restrictive planning policies.
Pershore	Separates rather discrete adjoin built elements of Pershore e.g. Pershore High School	Yes	SWDP2C	The SG is quite small with inter visibility restricted for the Station Road element by the school buildings	Only some of the SG is visible and only from Wyre Road	Only one on the Wyre Road frontage	Only along the Wyre Road frontage as access elsewhere is problematic and the land likely to be wanted for any extensions of the school.	No	Remove. Given the committed development on the south side of Wyre Road there is not a reasonable case to retain the SG here.
Pebworth	Separates built up elements of Pebworth	Yes	SWDP2C, SWDP 6/24	The SG is small with clear inter-visibility	Yes , the land is surrounded by the public highway.	No	No, given the policy restrictions, the Neighbourhood Plan and better alternatives.	No	Remove. Notwithstanding the other policy restrictions the land would be better suited for Green Space designation
Pinvin	Separates two built up areas of Pinvin	Yes	SWDP2C	The SG is small with clear inter-visibility	Yes, clearly visible from Main Street and the A44	No	Not for residential nor employment development rather some of the land could be incorporated within an improved highway junction scheme.	No	Remove. The A44 itself provides some albeit limited separation between the two built up areas
Upton Snodsbury	Separates two built up areas of Upton Snodsbury	Yes	SWDP2C, SWDP6/24 re adjoining Conservation Area	The SG is small with clear inter-visibility	Yes, clearly visible from the A442	Yes, around 50%coverage	Quite likely given previous developer and current	No	Remove, should there be a need to keep any of the land open it should be

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							developer interest		more appropriately be covered by the Green Space policy designation.
Whittington	The Significant Gap at Whittington is relatively extensive and broadly bounded by Swinesherd Way, Crookbarrow Way, the M5, the Cotswolds and Malverns railway and SWDP45/5 Elements of the SG serve different purposes. The element north of Walkers Lane provides an open buffer between the village and SWDP45/5(Worcester East urban extension-300 dwellings). The element to the south of Crookbarrow Way again provides a green setting for the city and also provides separation of Whittington Village and SWDP 45/1(Worcester South urban extension)	In part yes(only the small areas of SG to the south of Walkers Lane which separate the three developed areas of the village)	Yes SWDP2C, SWDP6/24(only in the south of the village)	It is a mixed picture. For the smaller elements of the SG there is strong inter-visibility but to the south of Whittington Rd, to the east and north of the village less so.	Most elements of the Significant Gap are clearly visible from a public highway, PRWs and the railway line	Yes, CfS 0123,010,0057, 0058,0918,0998,1000,0527 and 0999.	Access to the large area of SG to the south of Whittington Rd is problematic. North of Whittington Road can be readily accessed. Could easily see development proposals in and around the village itself.	For some elements yes	Retain the SG to the south of Whittington Road and the element bounded by the A4440, Church Lane, Berkeley Close, M5 and Brewers Lane.
Worcester M5 Corridor (North of SWDP45/5)	To provide a landscape setting for Worcester City.	Partially within the development /administrative boundary for Worcester.	Landscape condition on the Farmhouse Inn site SWDP43/20. Warndon Woodlands Local Wildlife Site Crookbarrow Scheduled Ancient Monument. Upper Battenhall Farm Scheduled Ancient Monument	The original purpose has been compromised through built and consented development.	Most elements of the gap are visible from the highway network in particular the A4440 and M5	No	Planning approvals on two substantive sites within the gap – Gtech and Warndon 6 (allocation). Further planning applications are not expected. Much of the undeveloped land within the gap in Worcester City's administrative boundary would be difficult to develop because of access issues and noise from the highway network.	Scale of the gap is not significant in terms of land take but there is significance in retaining a gap between SWDP 45/5 and the Worcester South urban extension in order to protect Whittington from being encompassed within Worcester.	Remove.
Worcester South	To maintain separation between Worcester South(SWDP45/1) and Kempsey	No	SWDP2C	No, if development encroached onto the intervening land it would be clearly visible	The SG is visible from a number of public roads most notably the A38, M5, Broomhall	Yes virtually all the SG and land to the south/south east beyond it is subject to CfS	The CfS are generally large and those most likely to be subject of a planning application will	Yes	Retain.

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				from Kempsey. Whilst landscaping can help to mitigate this there is no firm boundary.	Lane, Brookend Lane as well as several PRWs	submissions	be those on the north and south edges of the SG		
Worcester West	To maintain separation between SWDP 45/2(Worcester West) and the villages of Lower/Upper Broadheath, Hallow and Rushwick	No	SWDP2C	Will need to check the inter visibility but the SG could be reduced in size from the east and still retain it's primary function	The SG is visible from a number of public roads e.g. Hallow Lane/Road, Bell Lane, Marley Road etc and PRWs	Large swathes of the SG are subject to CfS representations	As for Worcester South above the CfS abutting the existing settlements are the ones most likely to be the subject of planning applications.	Yes	Retain. As for Worcester South and Leigh Sinton. Depending on the chosen spatial development strategy there could be scope e.g. at Rushwick to reduce the area of SG without compromising it's primary purpose.
Wyre Piddle	To maintain an open separation between Pershore and Wyre Piddle	No	SWDP2C	The open gap could be reduced/removed which clearly would reduce the gap but because of very limited inter-visibility	Yes , principally from Wyre Road and to a lesser extent Wyre Hill.	Yes CfS submissions	Quite likely for employment development given the continuing success of Keytec	No	Remove, provided there is a substantial landscape buffer on the eastern part of the SG there will be no visual inter-visibility between Pershore and Wyre Piddle.

4. Conclusions

- 4.1.** SGs remain a legitimate planning tool in the context of the NPPF but they need to be used in a limited and focused way as an integral part of a positively prepared Local Plan.
- 4.2.** It is considered that a number of SGs, typically the relatively small ones, are not necessary in order for the associated land to be kept open.
- 4.3.** Consideration needs to be given in respect of new or extended Significant Gaps should free standing settlements feature in the revised spatial development strategy. Generally it is considered good planning practice to retain an appropriate sufficient setting to settlements in order for them to retain their identity and Significant Gaps can help achieve that objective.