



Dunsfold Neighbourhood

Plan

Dunsfold Green Gap

July 2022



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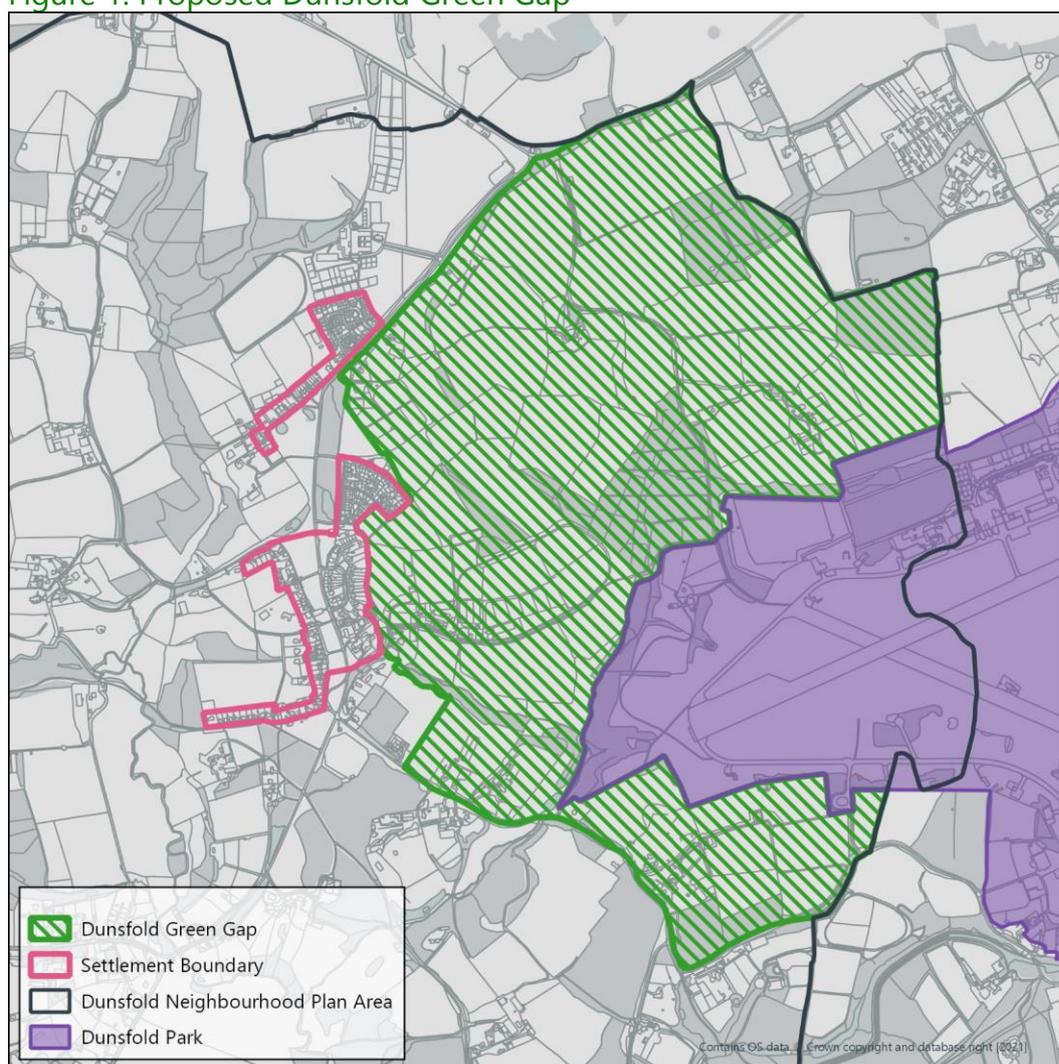
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Introduction

1. Strategic or Green gaps are a well-established planning tool, designed primarily to prevent the coalescence of nearby settlements and to protect the individual identities of these settlements. Green gaps are not formally recognised by the National Planning Policy Framework, but are included as policy designations in many local plans and help to guide settlement patterns in these local authorities. They differ from most other kinds of area designations, in that the land they seek to protect lies outside of the designated area rather than within it.
2. As part of the Neighbourhood Plan, the Neighbourhood Plan Steering Group propose to designate of a Green Gap between Dunsfold Park to the east and Dunsfold Village to the west. The proposed location and extent of the Dunsfold Green Gap is shown within Figure 1 below.

Figure 1: Proposed Dunsfold Green Gap





3. The purpose of this gap is to maintain and protect the open and undeveloped character between Dunsfold Village and Dunsfold Park. Of particular concern locally is the emerging Dunsfold Park new Garden Village village, Dunsfold Park, situated to the east of the village at Dunsfold aerodrome. There are concerns that the construction of Dunsfold Park might encroach on the existing village, eventually enveloping it so that the two villages become one continuous settlement. This report explores how strategic gaps have been used in other development plans, and how a strategic gap may be effectively designated in Dunsfold.

Green gaps in other local authorities

4. The term 'strategic / green gap' is not used universally or unambiguously, but generally they can be defined as "the gaps between settlements, where development is controlled in order to prevent settlements coalescing and losing their identity"¹. Different local authorities use the alternative terms of 'local gaps', 'settlement gaps' or 'countryside gaps'². Lyle and Hill (2003) trace the first usages of strategic gap policies in England back to 1979³. Since then, many local authorities have come to adopt some form of strategic / green gaps in their local plans. Other local authorities, although they do not have an explicit policy in reference to gaps, may have other policies which address the coalescence of settlements.
5. In 2008, the Partnership for Urban South Hampshire (PUSH) published their Policy Framework for Gaps⁴, in which they list the following criteria as guidance for local authorities to use when identifying land gaps:
 - a) "The open nature/sense of separation between settlements cannot be retained by other policy designations;
 - b) The land to be included within the gap performs an important role in defining the settlement character of the area and separating settlements at risk of coalescence;
 - c) In defining the extent of a gap, no more land than is necessary to prevent the coalescence of settlements should be included having regard to maintain their physical and visual separation."
6. Many local authorities have borrowed heavily from this framework when designing their own policies on land gaps. In 2012, PUSH updated the criteria for gaps in their South Hampshire Strategy⁵, suggesting that in addition to the previous framework:

¹ (Lyle & Hill, 2003)

² (Eastleigh Borough Council, 2018)

³ (Lyle & Hill, 2003)

⁴ (PUSH, 2008)

⁵ (PUSH, 2012)



“the Gap’s boundaries should not preclude provision being made for the development proposed in this Strategy”

7. An important aspect of the PUSH approach to note is that the designation does not necessarily prevent development within their areas. As the South Hampshire Strategy highlights, gaps are designed to shape development rather than stifle it, claiming that “the boundaries of Gaps must be defined in tandem with providing sufficient land to meet development needs”⁶. Development within strategic gaps is therefore permitted under certain circumstances. According to PUSH, development within strategic gaps may be permitted if it meets the following criteria⁷:
 - a) It would not diminish the physical and/or visual separation of settlements; and
 - b) It would not individually or cumulatively with other existing or proposed development compromise the integrity of the gap.

Benefits of strategic / green gaps

8. The primary objectives of strategic / green gaps are to prevent the coalescence of nearby settlements and to protect the individual identity of these settlements. By producing a visual and physical break in the built environment, strategic gaps can maintain a sense of place for residents of local communities, as well as providing a sense of distinction for those travelling through the gaps. By designating a strategic / green gap to the east of Dunsfold Village, there would be a distinct physical break between the village and Dunsfold Park. People travelling between the two would have the sense of leaving one settlement and entering another. Based on its extensive history and rural nature, Dunsfold Village also has a distinct character, which has been recognised by its two Conservation Areas. A gap could protect this identity by preventing encroachment from other nearby settlements.
9. As many local authorities have highlighted, however, there are additional benefits to the designation of green gaps. Green gaps are valued because they may provide opportunities to preserve and enhance green infrastructure and local biodiversity. For example, in their Southampton-Eastleigh local gap, Test Valley council claims there is an added benefit of providing an ecological corridor between areas of woodland⁸. Dunsfold Village lies on the edge of the Surrey Hills Area of Outstanding Natural Beauty (AONB), and is itself designated as an Area of Great Landscape Value (AGLV). The Chiddingfold Forest Site of Special Scientific Interest (SSSI) is located south of Dunsfold Village, and is recognised for its rich habitats and biodiversity. There are

⁶ (PUSH, 2012)

⁷ (PUSH, 2008)

⁸ (Test Valley Borough Council, 2016)



also designated Sites of Nature Conservation Importance (SNCI) designated to the north-east and south-west of the proposed gap, which provide green corridors for the migration of species. A designated strategic gap in Dunsfold could therefore help to prevent the loss and deterioration of vital ecological systems.

10. Another benefit of green gaps to the local community is that they can provide open space for recreational and leisure purposes. By designating a strategic gap, these open spaces can be used for public parks, play areas and sports fields. In their Settlement Gap Policy Review, Eastleigh Borough Council indicated that gaps may also be used for temporary events and activities such as markets and festivals⁹. There are therefore a variety of recreational and leisure uses associated with strategic gaps that could contribute to the public health and wellbeing of Dunsfold Village residents.

National Policy

11. Although strategic / green gaps are not formally recognised in the National Planning Policy Framework, many aspects of the NPPF implicitly support the designation of strategic gaps as a method of guiding settlement patterns.
12. One of the three main objectives of the planning system as defined in Paragraph 8 of the NPPF is an environmental objective, which aims “to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy”¹⁰. This aligns with strategic gaps, as they can help to protect local habitats and biodiversity.
13. Paragraph 9 states that planning policies “should take local circumstances into account, to reflect the character, needs and opportunities of each area”¹¹. This is consistent with the designation of strategic gaps, as one of their main objectives is to protect the distinct character and identities of individual settlements.
14. Paragraph 144 recognises the importance of preserving the character of rural villages, and supports the use of policies designed with this consideration: “If, however, the character of the village needs to be protected for other reasons, other means should be used, such as conservation area or normal development management policies”¹².

⁹ (Eastleigh Borough Council , 2017)

¹⁰ (Ministry of Housing, Communities & Local Government, 2021)

¹¹ (Ministry of Housing, Communities & Local Government, 2021)

¹² (Ministry of Housing, Communities & Local Government, 2021)



Green gaps in Waverley Borough

15. Unlike the NPPF, the Waverley Borough Local Plan Part 1: Strategic Policies and Sites February 2018 does explicitly refer to strategic gaps, as the council has already designated a strategic / green gap between the towns of Farnham and Aldershot. This gap has been identified to prevent inappropriate development between the two towns, and the council claims that it plays an important role in preventing the coalescence of Farnham and Aldershot, as well as “promoting enhancement of the landscape and conservation of wildlife sites, and promoting improved public footpaths and bridleways”¹³. The council also plans to develop a more detailed policy which can protect the strategic gap between Farnham and Aldershot. There is, therefore, a foundation for strategic gaps in the borough of Waverley.
16. Waverley Borough has another policy designation that carries out some of the same functions as a strategic gap – Areas of Strategic Visual Importance (ASVI). Land around the towns of Farnham, Godalming, Haslemere and Cranleigh has been designated as an ASVI, with the purpose of preventing the coalescence of these settlements. This is similar to the objectives of a strategic gap, but the Farnham/Aldershot strategic gap aims to go further than this, as it also hopes to provide recreational and biodiversity benefits.
17. Beyond this, Waverley Borough Council also describes many aims and objectives which align well with the purposes and potential benefits of strategic gaps. These have been laid out in the table below:

Objective of strategic gap	Evidence from Waverley Borough Council Local Plan	
	Paragraph	Excerpt
To guide settlement patterns and to prevent coalescence of settlements	Chapter 5 – Spatial Strategy Paragraph 21	“The countryside outside the Green Belt plays an important role in defining the character of Waverley, in some cases, providing a rural buffer between settlements.”

¹³ (Waverley Borough Council, 2018)



Objective of strategic gap	Evidence from Waverley Borough Council Local Plan	
	Paragraph	Excerpt
To protect the identity and character of settlements	Chapter 3 – Spatial Vision Paragraph 11	“The unique and diverse character of Waverley’s towns, villages and countryside will be cherished and preserved. New development will have taken account of this diverse character and of the different roles and functions of the settlements in Waverley.”
	Chapter 4 – The Local Plan Objectives Paragraph 17	“To safeguard and enhance the historic heritage and the diverse landscapes and townscapes in Waverley, and to ensure that new development takes proper account of the character and distinctiveness of the area in which it is located.”
	Chapter 14 – Townscape and Design Paragraph 2	“The environment of the built-up areas and villages in Waverley is attractive and varied and is valued by the community. The character ranges from the historic centres of the main settlements to the distinctive but varied character of the villages. There exists a strong link between the historic landscape and settlement and this relationship has had a clear impact on shaping the character of all the settlements throughout the borough.”



Objective of strategic gap	Evidence from Waverley Borough Council Local Plan	
	Paragraph	Excerpt
	<p>Chapter 14 – Townscape and Design</p> <p>Paragraph 7</p>	<p>Good design facilitates and contributes to local distinctiveness, a sense of place, and civic pride. It improves and enhances the existing environment and helps to attract people, businesses and investment. The quality of architecture and design are both relevant to the impact that development will have on the character of the area. High quality development is designed so as to understand the context within which it is located. It is critical, both environmentally and economically, that Waverley continues to enhance the distinctive character of the towns and villages and ensures that new development positively responds to the environment rather than detracts from it."</p>
<p>To provide open spaces for residents which can be used for recreational purposes</p>	<p>Chapter 2 – The Spatial Portrait</p> <p>Paragraph 35</p>	<p>"It is important that communities have access to open space close to where they live. These spaces and particularly those in the built-up areas contribute significantly to the character and amenity of these areas."</p>



Objective of strategic gap	Evidence from Waverley Borough Council Local Plan	
	Paragraph	Excerpt
	Chapter 4 – The Local Plan Objectives Paragraph 8	“To protect the countryside for its intrinsic character and beauty and as a recreational asset, including its visitor facilities and, where appropriate, promote its continued recreational use.”
	Chapter 12 – Leisure, Recreation and Culture Paragraph 13	“A deficiency in provision for children and young people overall, has been identified in Waverley, and redressing this is one of the Council’s corporate priorities.”
To protect and enhance green infrastructure and biodiversity	Chapter 3 – Spatial Vision Paragraph 12	“The rich biodiversity of Waverley will have been preserved and where possible enhanced.”
	Chapter 16 – The Natural Environment Paragraph 15	“The Council will encourage contribution toward, or provide, opportunities to enhance the existing provision of green infrastructure, including designated sites, and improve the connection of existing open spaces.”



Objective of strategic gap	Evidence from Waverley Borough Council Local Plan	
	Paragraph	Excerpt
	Chapter 16 – The Natural Environment Paragraph 19	“Locally designated sites provide an important contribution to the wider biodiversity of the Borough... They provide an opportunity to develop a network of sites, providing corridors for the natural dispersal and migration of species. This is identified as being of increasing importance due to the effect of climate change on habitats, ensuring there are routes available to alternative suitable habitats. There is also a recognition that biodiversity needs to be protected and managed at a landscape scale rather than just protected areas.”

Determining the Dunsfold Green Gap

18. Drawing on the PUSH and Waverley gap methodology, five criteria have been identified to assess the appropriateness of, and extent of, the proposed Dunsfold Green Gap:
- (a) Prevent coalescence of settlements.
 - (b) Protect the identity and character of settlements.
 - (c) Be no greater than is necessary to prevent coalescence and to maintain physical and visual separation.
 - (d) Not preclude provision being made for some development within the gap.
 - (e) Provide recreational value and green infrastructure and biodiversity opportunities.



Criterion A: Coalescence of settlements

19. The proposed Green Gap is located within the Wooded Low Weald area, as identified by the Surrey Landscape Character Assessment¹⁴. This area is characterised by a relatively flat topography and significant woodland areas. Although the region is generally noted for its enclosed nature due to small field sizes and boundary vegetation, the Dunsfold to Pollingfold Wooded Low Weald has larger field sizes and fewer hedgerows and trees, giving it a more open character than much of the surrounding area. This open nature, combined with the relatively flat topography, allows for long distance views across the area. As such, it is important that a strategic gap can maintain a sense of both physical and visual separation between settlements.

Criterion B: Identity and character of settlements

20. To the east of Dunsfold Village is the proposed new village at Dunsfold Park which has a total allocation of 1,800 homes, with a potential expansion to 2,600 homes. Dunsfold Park will be largely occupied by newcomers to the area. By comparison Dunsfold Village has a historic rural character based on agriculture and is considerably smaller with around 500 homes. In addition to having very different built form characteristics the two settlements are also likely to have very different socio-economic and demographic characters.
21. The draft Supplementary Planning Guide for Dunsfold Park shows that while most of the area within Dunsfold will be part of the proposed County Park, some Dunsfold Park housing will fall within the current Parish boundary. The boundary of Dunsfold Park would therefore be situated just over 700 metres from the periphery of Dunsfold Village. Any future expansions or developments would further shrink this already narrow gap, potentially leading to the coalescence of Dunsfold Village with Dunsfold Park.

Criterion C: No greater than necessary

22. The Green Gap as proposed only designates land, which is necessary to prevent the coalescence of Dunsfold Village and future developments, thereby maintaining a sense of physical and visual separation.

Criterion D: Not preclude development

23. The proposed Green Gap would not entirely preclude development within its boundaries where it would not materially harm physical and visual separation between Dunsfold Village and Dunsfold Park and where it complies with other policies within

¹⁴ (Surrey County Council, 2015)



the adopted Development Plan. In keeping with Dunstable Village's historic character, any development within the gap should be confined to agricultural or equestrian purposes.

Criterion E: Recreation, Green Infrastructure and Biodiversity

24. Limiting development within the gap will help to maintain existing recreation opportunities and enjoyment for users of the Bridleways and Footpaths within the proposed area. The gap would also help to maintain and protect green infrastructure and biodiversity.

Conclusion

25. Drawing on best practice, five gap assessment criterion have been identified and then used to assess the appropriateness and extent of the proposed Dunstable Green Gap. This assessment has confirmed that the proposed Dunstable Green Gap, as illustrated within Figure 1 of this report, is appropriate and justified.
26. The suggested policy wording for inclusion of the Dunstable Green Gap within the Dunstable Neighbourhood Plan is:

Development within the Dunstable Green Gap as shown of Figure 4.2 and the Key Diagram, will not be permitted unless:

- (a) The open or undeveloped character of the Gap would not be adversely affected; and**
- (b) The separate identity (physical and visual perception) of Dunstable Village from Dunstable Park would not be harmed.**

Any development within the Dunstable Green Gap should be restricted to agricultural and / or equestrian uses.