

NAILSEA TOWN COUNCIL RESPONSE TO THE CORE STRATEGY CONSULTATION February 2010

Summary

The Town Council generally supports the aims and intentions of the Core Strategy and is pleased to acknowledge that the Strategy incorporates the key conclusions and priorities of the Nailsea Parish Plan. A clear omission is the need to encompass the development of leisure and culture as vital components of sustainable communities. A district wide strategy for leisure facilities is essential.

The Core Strategy addresses, by definition, high level issues, but assessing their practical impact highlights some logical inconsistencies. This means that key aspirations cannot be delivered. Specifically, the Strategy has to:

- consider the Green Belt as it affects the entire settlement boundary.
- implement proactive management, through the planning system, to influence the mix of housing.

General

There are specific issues regarding the content of the Core Strategy that the Council wishes to address.

1. Words and phrases with assumed meanings. These include:

- a) **'sustainability', 'self containment' and 'mixed and balanced communities'**: these are assumed to be desirable but must be defined in relation to individual settlements in order to have meaning. Without definitions they can actually become misleading because they mean very different things to different people.
- b) **'employment-led growth'**: if new employers can be attracted to the Town what type of jobs will be created? Is it likely that, say, a large professional services business will relocate to Nailsea? If a warehousing company relocates they may create a small number of jobs but the impact on the road infrastructure could be very unwelcome. A call centre with many part-time staff would have a very different impact.

~~Employment-led growth~~ is a laudable concept but is complex in practice and, if applied inflexibly, could act to artificially constrain other critical goals of the Strategy. The existing facilities for employers should be improved, but new employment should not be a precondition for other new development such as leisure or housing.

- c) **'out-commuting'**: this is assumed to be undesirable but the picture resulting from scenarios where it is decreased are not uniformly attractive e.g if significant new jobs cannot be created, a reduction in out-commuting will be the result of fewer people in work either through age or unemployment. This will have a negative impact on the local economy. A certain level of out-commuting therefore could be an indicator of economic health in the Town.

2. Logical inconsistencies

The lack of clarity with regard to words and phrases with assumed meanings has created some logical inconsistencies within the strategy. Specific to Nailsea, policies such as no change to the Green Belt and a reactive housing policy are mutually exclusive to the aspiration for a sustainable community with a balanced population. The rejection in principle to changes in the Green Belt, whilst promoting the vision and objectives of the Strategy is not tenable.

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Measures of Success

The success of the Core Strategy will be judged by whether or not measurable or observable improvements have occurred during the period in which it operates.

For Nailsea, the criteria against which the Core Strategy will be judged include the following. These are regarded as specific areas that represent an element of sustainability. Each of the measures uses the situation as it prevailed in January 2010 as the benchmark:

Item	Less	No change	More
Green Belt			✓ Renegotiate the boundaries and extent of Green Belt.
Housing			✓ Controls over type and mix
Junior and infant school rolls			✓
Leisure and cultural facilities			✓
Local employment			✓
Nailsea School roll			✓
Out-commuting	✓		
Public Open spaces			✓
Public Transport			✓ The cost, especially of bus services, acts as a constraint on usage
Retail outlets			✓ Concerns over type and mix

Demographics

The area of most significance and complexity is the age profile of the population. The analysis included as an appendix highlights the following issues:

1. There are significant trends which have been, and are continuing to affect, the demographic structure of the town.
2. In essence the population age structure is rapidly moving toward one which the Town Council regards as unbalanced in terms of long term sustainability for the Town.
3. The total number of school students in Nailsea is declining.
4. The major cause of the imbalance is the availability and affordability of housing. Nailsea has a shortage of properties suitable and affordable for younger people and the parents of school-age children seeking family homes. Equally, it has a shortage of properties allowing older people to downsize.
5. Planning applications for new builds tend to be for larger, more expensive properties.

The Council regards this information to be a robust evidence base (Core Strategy 1.14) and therefore adequate to influence Core Strategy decision and plan making.

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Policy CS6: Green Belt¹, and Policy CS19: Green wedges/strategic gaps

The Core Strategy policy is that the Green Belt will remain unchanged, unless there are exceptional circumstances². The Strategy itself is silent on extending the Green Belt but does refer to the proposed extension to south west Nailsea in the 2006 draft Regional Spatial Strategy which has been removed in the current revision.

Nailsea has a ring of Green Belt land from the north-west to the south east boundaries of the Town. This relates to approx 50% of the boundary, the rest of which is not designated as Green Belt. Discussion regarding the entire settlement boundary is required. The aim is that the extent of Green Belt is increased but with adjustments to the existing designation where this promotes the goals of the Core Strategy and the Parish Plan.

The Town Council considers that exceptional circumstances for change do exist in the following location:

Southfield Road trading estate: a relaxation of the Green Belt (as previously requested) is essential in order to develop the potential for employment opportunities in the Town and reduce out-commuting, which are part of the strategic priority of supporting a successful economy (CS20). This would also support the objective of sustainability, self-containment, improving the town's role as a service centre and encouraging a mixed and balanced community (CS15 and CS31: Market and Coastal Towns).

Policy CS13: Housing, CS15: Mixed and Balanced Communities and CS16: Affordable Housing

The Parish Plan states that the Town Council supports a policy of limited growth, sufficient to maintain a balanced population age structure, stable in size. It also supports limited growth of housing.

The numbers quoted in the Strategy are not specified as to the mix of housing which is required, even though CS31 refers to housing development which will improve the current mix of house types and sizes, improve affordability and make contributions towards infrastructure and facilities (4.87).

Increasing housing numbers by opportunistic developments is unacceptable, since the likelihood is this approach will compound existing and future demographic problems. In other words the goals of strong and inclusive communities and delivering a prosperous economy could be actively undermined by a reactive approach to planning.

If the age structure of the Town changes as our research suggests the vision to retain community assets such as schools will be under threat. Successful schools of optimum size are critical to Nailsea's future. The vision also refers to new

¹ The Town Council strongly supports the principle of Green Belt but concurs with the following comments from Ringwood Town Council in 2008:

The Council's consultation in its Town Plan showed that people wish to live, work, shop and play in the town. It is now commonly thought that green belt land has important physical characteristics in itself, rather than the original intention when green belt was first established which is an open area between two urban settlements. Green Belt should be reassessed by looking at how much open area is necessary between two settlements in order to ensure the economic viability of both.

² Only in exceptional circumstances where there is an overriding need to accommodate what would otherwise be inappropriate development which cannot be met elsewhere and where Green Belt land offers the most sustainable option, will land be taken out of the Green Belt.

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development focussing on addressing local housing need to encourage a more balanced age structure and support economic growth. A demographic picture over the next 20 years that significantly reduces the population of school and working age residents presents a major challenge to this vision.

The key questions are:

- Does the planning authority have the power to be prescriptive regarding housing mix when it assesses planning applications? and
- If it does have the power, does it have the will to pursue the goal of strong and inclusive communities i.e. CS15. The policy will be delivered through the preparation of detailed masterplanning, briefs and urban design codes for new developments, the assessment of planning applications, and exploring opportunities to re-balance the housing stock within existing communities.

Policy CS31: Market and Coastal Towns

CS31. The emphasis will be on discouraging development which would reinforce this [i.e. out-commuting] and on encouraging local employment and service provision which would stem the flow of commuters. Nailsea in particular has suffered from being planned as a dormitory town in the 1960s and would benefit from development which would enable a more balanced community to take shape.

The concerns regarding internal inconsistencies in the Core Strategy can be encompassed in relation to the goals of CS31 i.e. increase self-containment, availability of jobs and services and improve the town's role as a service centre.

Conclusion

The Core Strategy and the Sustainable Community Strategy refer to the need to incorporate important aspects of local distinctiveness and key local issues (2.5). The visions are described as aspirational, yet realistic and deliverable.

Without a proactive and managed approach to residential development and reconsideration of the Green Belt boundaries the overarching strategic goals of the Core Strategy in relation to Nailsea are unachievable and therefore the aspirations will, in practice, be unrealistic and undeliverable. The real risk is that rather than Nailsea prospering during the period covered by the Core Strategy, it will in fact atrophy. Tackling the issues of Green Belt and housing would also ensure better adherence to the other important goals of the Core Strategy.

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APPENDIX 1: DEMOGRAPHIC ANALYSIS

An analysis of demographic changes in Nailsea from 1991-2009 has identified the following important trends:

- A rapid shift in the age balance of the population (see Trends chart below).
- The trendline of the population shift suggests that in the next 15-20 years the number of residents in the 0-15 and the >75 groups will be the same, with the former group declining and the latter group increasing. In 10 years time more than 50% of the population will be 45 and older.
- Whilst the size and proportion of the 16-24 age group has remained steady, most of these people are probably in full-time education. The concern is therefore that the majority of this group may be restricted from remaining in Nailsea due to employment and/or the availability and affordability of suitable housing. The key group in terms of families (i.e. those aged 25-44) are declining as rapidly as the 0-15 group.
- The assumption is that without additional housing Nailsea's population will decline: this is based on average household size declining and the limited availability and affordability of properties for families with school-age children. However, an increase in dwellings for older people may maintain the population size but will increase the rate at which the age balance changes.

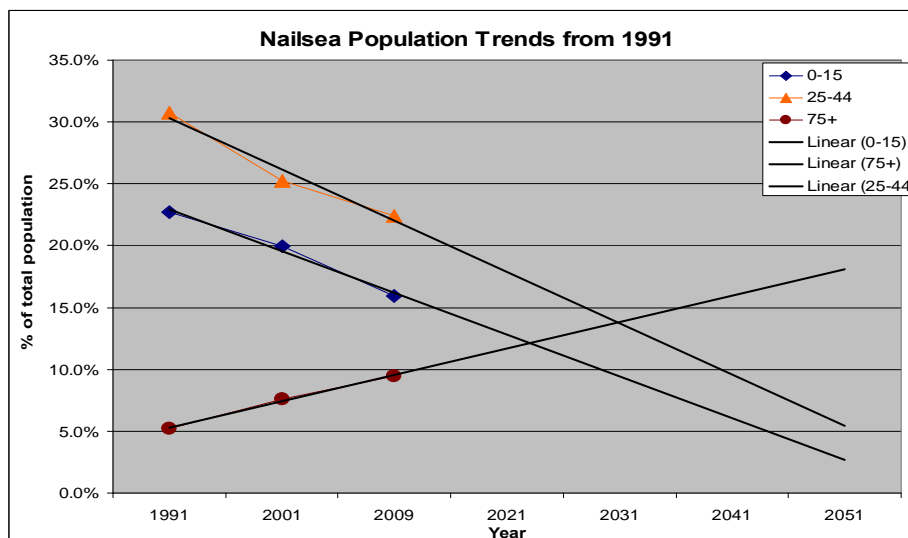
Population figures by age range

	0-15	16-24	25-44	45-64	65-74	75+	All ages
1991	3,912	2,026	5,297	3,902	1,194	899	17,230
2001	3,484	1,628	4,399	5,055	1,545	1,323	17,434
2007	2,639	1,935	3,714	4,999	1,685	1,570	16,542

Figures are derived from stats for Nailsea North and West and Nailsea East wards and also include The Elms, which is in Wraxall and Long Ashton ward. However, the residents of The Elms have a material impact on local services in Nailsea such as schools, health services, road usage and shopping.

Population percentages by age range

	0-15	16-24	25-44	45-64	65-74	75+	All ages
1991	22.7%	11.8%	30.7%	22.6%	6.9%	5.2%	100.0%
2001	20.0%	9.3%	25.2%	29.0%	8.9%	7.6%	100.0%
2007	16.0%	11.7%	22.5%	30.2%	10.2%	9.5%	100.0%

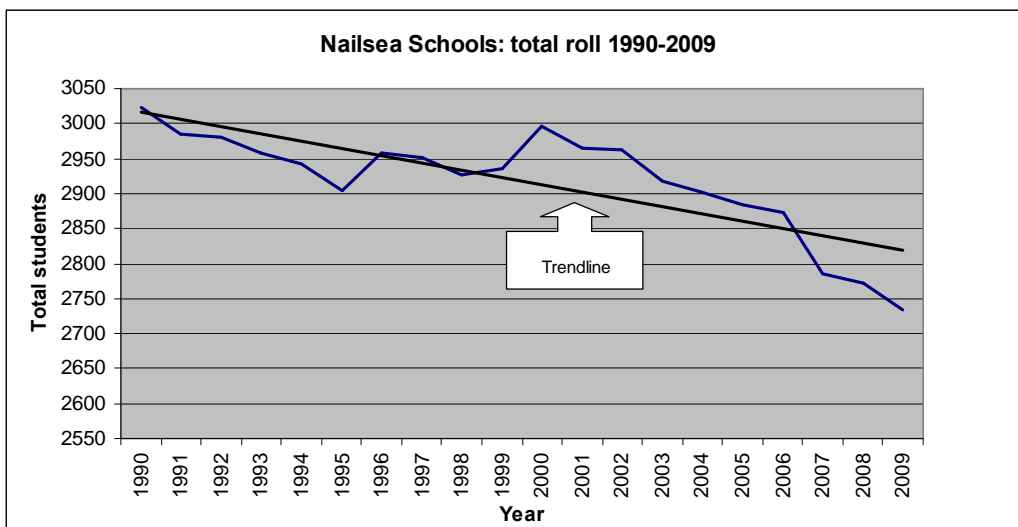
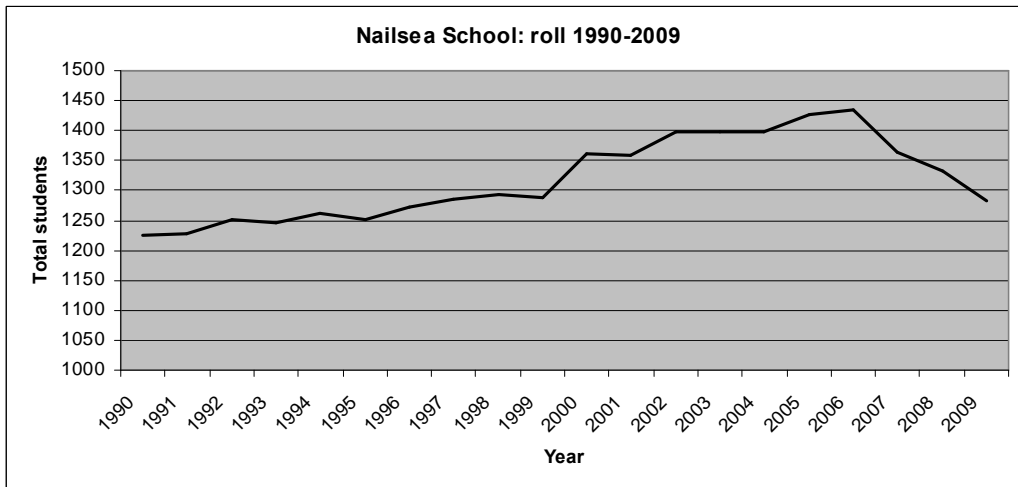


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APPENDIX 2: SCHOOL ROLLS

An analysis of school rolls in Nailsea from 1990-2009³ can be summarised as follows:

- 2 infant schools have closed following a decline in numbers (Greenslade: closed 31 August 1999. Four Oaks: closed 31 August 2003).
- The 2009 roll at Hannah More School is at a similar level to 1990 despite fluctuations during the period. The numbers at St Francis School have remained consistent.
- Golden Valley School has increased its roll by 7% (26 students), and Ravenswood School has increased by 55% (39 students).
- Grove Junior School's roll has reduced by 22% (86 students) during the period.
- Kingshill took over from Nailsea Junior School in September 1999. The roll has fallen by 40% (108 students) in the 20 year period.
- Nailsea School has shown an increase of 5% (56 students), but has declined by 11% (152 students) since peaking in 2006.
- The total number of students has declined by 9.6% from 3,024 to 2,733 (291).



³ Source: North Somerset Council