

Position Statement

On behalf of Nailsea Town Council in preparation for the North Somerset Core Strategy

Examination

Issue 3 Spatial Strategy to be held 25 November 2011

Introduction

1. Nailsea Town Council (NTC) broadly supports the North Somerset Core Strategy Publication version and has worked with the unitary authority in preparing the document. The Town Council supports the vision for Nailsea as set out in Vision 4 of the document and agrees with the approach of the unitary authority (as set out in the Priority Objectives of the Core Strategy) that “strategic development” will be focused at Weston-s-Mare whilst employment growth throughout the area will seek to “support greater self containment” and Nailsea should be a “thriving, prosperous settlement and local service centre”. This has been endorsed by the categorisation of Nailsea as a main town, along with Clevedon and Portishead.
2. NTC has carried out research into demographics which shows that the main threat to the maintenance of this vision is that the population of Nailsea will decline significantly and its average age will increase substantially over the period of the Core Strategy. Therefore, NTC has consistently sought to support limited housing and employment development in the town which enhances the sustainability of the settlement. Work in regard to the Parish Plan (Towards a Parish Plan 2008) has identified the characteristics of new development needed to support future generations within the town.
3. NTC wishes to take forward the findings from the Parish Plan work (copies already provided to the Examination in the Town Council’s previous submissions) in considering the future of the town via the unitary authority’s Site Allocations Development Plan Document and also a Neighbourhood Plan.

Green Belt Boundary

4. There has been no assessment of the Green Belt boundary around Nailsea as part of the Core Strategy preparation and therefore there has been no opportunity, to date, to consider the appropriate boundaries around the town. The proposed wording of Policy CS6 precludes any change to the Green Belt boundary within the plan period.
5. The Town Council wishes to consider the future of the town in the context of the opportunities and constraints which impinge on it but to do so in the widest sense and not to be constrained in this assessment. The Town Council would therefore wish to consider future development strategies within and around the town in the context of a Green Belt boundary which might be reviewed and/or amended in exceptional circumstances.
6. This was the situation which was set out in the Draft Core Strategy in November 2009 when the proposed wording for Policy CS6 allowed for changes to the detailed Green Belt boundary through local review “through a Local Development Document “.
7. This provided flexibility for the review of detailed Green Belt boundaries where this might provide for the most sustainable option for growth and this is a position which the Town Council considers may apply to Nailsea. The Town Council has previously supported employment development at the north east side of the town on land which is within the

Green Belt (Replacement Local Plan Inquiry 2006). The Town Council wishes to continue to investigate the possibility of bringing forward an area of land in this vicinity. It is proposed that this would be through either the Site Allocations DPD or through a Neighbourhood Plan. However, the current wording of Core Strategy Policy CS6 would mean any such approach would not be in conformity with the Core Strategy.

8. In parallel with this the Town Council would also wish to consider the role of all land around Nailsea in performing a Green Belt function and (where appropriate) extending the Green Belt boundary. This approach would also be precluded by the current wording of Policy CS6.
9. The opportunity to identify a Strategic Gap as set out in Policy CS19 might be considered in some way to address this issue but it is considered appropriate by the Town Council that there should be a robust assessment of Green Belt boundaries for the town as well as any such specific assessment. The principle of maintaining a strategic gap between Nailsea and Backwell has always been supported by the planning authority and the Town Centre would wish to investigate whether this land performs Green Belt functions and should therefore be designated as such.
10. The Town Council believes that, without the ability to review the detailed Green Belt boundary in order to provide for locally generated development needs, or to extend the boundary to include land which performs Green Belt functions, decisions may be taken which result in unsustainable development for the town.
11. Therefore, the Town Council wishes to work in partnership with the Unitary Authority to identify the most sustainable long term pattern of growth for the town which includes a review of Green Belt boundaries through the development plan process. Hence, the Town Council wish to see flexibility reintroduced to policy CS6 as it was in the Draft Core Strategy (November 2009).

Scale of development

12. Nailsea Town Council has not been able to reconcile the development quantum set out in Policy CS31 with the local needs of the community. The Core Strategy figures appear to have been set on the basis of existing capacity rather than any understanding of the actual needs of the community itself.
13. In regard to employment land, the Core Strategy appears simply to assume the delivery of land already allocated for development, without any recognition that the land in question (Site E1 and E2 in the Replacement Local Plan) is no longer available for development. Evidence already submitted to the Core Strategy indicates the need for increasing amounts of employment land to help address existing issues of self containment and the Town Council has previously promoted the provision of additional land to meet this need.
14. The Town Council intends to consider this further through the Site Allocations DPD and also in a Neighbourhood Plan for the town.
15. In regard to housing, the Core Strategy only allocates 151 dwellings for the town of which at least 89 have been completed in the period 2006-2011. This therefore provides for only 62 dwellings (at most) to be delivered in the town from 2011-2026 (an average of 4 dwellings per annum). This is insufficient development to avoid the population decline and shift towards an aging population already identified.
16. The Town Council is concerned that this also provides very little opportunity to influence the mix of dwellings within the town. Previous evidence prepared by the Town Council and

provided to the Inspector indicates that there is a need to encourage forms of housing for first time buyers but most particularly for those wishing to downsize but remain within the town.

17. The draft National Planning Policy Framework (NPPF) provides the opportunity for a Neighbourhood Plan to promote more development than is in the Local Plan and Nailsea Town Council intends to take this opportunity to further consider the right nature and scale of housing for the town through this process. Therefore, the Town Council considers that the figures shown in Policy CS31 are to be considered a minimum which will act as a basis for discussions for the Neighbourhood Plan. However, the Town Council does not wish to see the figures changed at this point in time as the evidence as to the right level of development for the town will be developed through a Neighbourhood Plan.
18. In parallel with this consideration of housing need, the Town Council notes the findings of the SHLAA (August 2011). For Nailsea the study indicates 4 sites which are assessed to be "Identified Potential" providing a maximum of 408 dwellings. For historical and site specific reasons, NTC does not accept that the sites have the identified potential.
19. However, the Town Council also notes that there are two sites, the Former Four Oaks School and land at Whitesfield Road, where North Somerset Council itself is promoting housing development and which could realistically be included within a SHLAA and meet the tests for deliverability.
20. The SHLAA is not subject to consultation but the Town Council proposes to work alongside the Unitary Authority to identify sites within the town for development and to seek their allocation through the Site Allocations DPD and/or a Neighbourhood Plan. To facilitate this the Town Council has prepared a detailed critique of the SHLAA is attached to this Position Statement for information.

Summary

- Nailsea Town Council wishes to see the wording of Policy CS6 revert to that which was included in the Consultation Draft Core Strategy (November 2009).
- Nailsea Town Council is not proposing any change to the housing and employment figures in Policy CS31 but will use these as a minimum figure in developing a Neighbourhood Plan.
- Nailsea Town Council does wish to see the final paragraph of policy CS31 amended to provide flexibility for Green Belt boundaries to be amended in the Site Allocations DPD.
- Nailsea Town Council does wish to see the final paragraph of the relevant section in Policy CS14 to be amended to delete reference to the Green Belt, such that sites may come forward if they are allocated for development.

North Somerset SHLAA (Aug 2011)

Introduction

1. These comments have been prepared by Nailsea Town Council in regard of the North Somerset SHLAA August 2011.
2. These comments relate to the approach adopted by the Council in assessing sites (and particularly which areas to survey) and specifically relates to the sites identified which are in and around Nailsea.
3. The comments are provided as the basis for discussion with the planning authority in order that we can work together in developing a future vision for the town.

Sites and areas to be surveyed

4. The North Somerset SHLAA is based on an assessment of available sources of supply across the district and the document suggests that a total assessed capacity of 31,061 dwellings (para.11) has been identified. However, the study then discounts the majority of this through an assessment process.
5. The result is a report that identifies a total of 53 sites which are considered to provide capacity for 7,361 dwellings "In locations which are broadly consistent with the policy objectives of the Core Strategy" (Para 11). (The Council might like to note that the calculation of all of the maximum figures in the Identified Potential actually provides for 7,356 dwellings)
6. However, this approach is fundamentally flawed because it makes assumptions based on the Draft Core Strategy rather than being a document which provides evidence upon which the Core Strategy draws.
7. Central to this is the treatment of Green Belt.
8. The Core Strategy should include a review of the Green Belt boundary as a central part of the assessment. This was required by RPG10 (now the Regional Strategy) and was expected by the Inspector at the Replacement Local Plan Inquiry.
9. In the SHLAA the Council assume that (in line with draft policy CS6) there shall be no changes to Green Belt boundaries and therefore all land within the Green Belt is discounted from consideration automatically without any further assessment of its merits.
10. At the same time the Council assume that sites adjacent to but outside of settlement boundaries will be allocated for development and allowed to develop (Ref SHL119 NW Nailsea), despite the fact that the Site Allocations DPD is yet to be commenced.
11. This approach results in perverse outcomes within the SHLAA report and this has particular impacts for Nailsea as the Green Belt restricts development on the north side of the town but not the south. Therefore, it appears that the Council is supporting development outside of the town to the south but not to the north, without any regard being paid to the merits of any parcel of land.

12. The Core Strategy proposes that development will generally be directed to Weston-s-Mare, thereafter the majority of further development will be directed to Nailsea, Clevedon and Portishead.
13. It goes on to say “In the rural areas new residential development will be strictly controlled although within service villages there will be opportunities for small-scale development either within settlement boundaries or through site allocations. In infill villages limited infilling will be acceptable within settlement boundaries” (Policy CS14)
14. However, the SHLAA includes very limited opportunities for development in Portishead (20 dwellings) and Clevedon (100 dwellings) with 408 dwellings identified on land in and around Nailsea.
15. This is partly because there are high levels of planning permissions in Portishead and Clevedon already but is also because Nailsea is not wholly surrounded by Green Belt. Therefore the SHLAA assumes that a large site (SHL119) will come forward simply because it is on the edge of the town but not located within the Green Belt. This is a site which has previously been dismissed at appeal and has been consistently resisted by the Town Council because of its unsustainable location.
16. The SHLAA also identifies 290 new dwellings for Yatton and 395 for Winscombe, when both are Service Villages, which the overall strategy requires should only provide for “small scale” opportunities.
17. In the context of these figures it is hard to reconcile how the SHLAA can be “broadly consistent with the policy objectives of the Core Strategy”.
18. It is the view of Nailsea Town Council that the SHLAA should have assessed the merits of all sites which are available for development in and around each of the settlements, whether they are in the Green Belt or not. It should then be for the development plan process, through firstly the Core Strategy and subsequently the Site Allocations DPD, to identify the appropriate locations for development to meet the spatial strategy.

SHLAA sites around Nailsea

19. The SHLAA identifies 4 sites in and around Nailsea which make up part of the identified potential for the district.

SHL04 Former Glassworks site

20. The site is made up of two parts, the larger area, to the north and east is an open site for which the Town Council has agreed a landscape scheme and will possibly acquire from the current owners. This larger portion of the site is a scheduled ancient monument and work with North Somerset Council and English Heritage indicates that it is likely to be undevelopable.
21. The western end of the site is occupied by a building for which there have been previous proposals for development including residential conversion. The planning authority is currently considering a planning application for commercial use. The development of the building is constrained by Scheduled Ancient Monument status.

22. The SHLAA suggests that the Availability and Achievability of the site are uncertain and this is a position endorsed by the Town Council. We therefore do not understand how the site can be relied upon to be developed if both of these issues are uncertain.

SHL119 North West Nailsea

23. The land in question was part of a larger parcel which was allocated in former Local Plans, the latest of which was the North Somerset Local Plan, adopted in 2000. In 1994, the Council was minded to approve an application subject to a legal agreement relating to highway infrastructure, local needs housing and phasing. The agreement was never signed and the application was assumed to be withdrawn.
24. A planning application for 463 dwellings and ancillary development (Ref 02/2450/0T2) was submitted in 2002 and, being in line with the development plan at the time, was considered favourably by the planning authority. However, following intervention by GOSW the Second Deposit RLP was altered to remove reference to the allocation and therefore the underlying policy support for the site was removed.
25. The Council advised the applicant that the application would, in the circumstances, be refused and the applicant chose to withdraw the application prior to determination. The site was not allocated in the Replacement Local Plan; the inspector concluded that potential benefits would not outweigh the conflict with the RLP's locational strategy and the loss of this greenfield site to development.
26. The Town Council therefore cannot understand how this site can be considered suitable for development within the context of the development plan. The site is outside of the settlement boundary and only if the boundary was to be redrawn and/or the land be allocated for development would the site achieve a planning consent.
27. This is one of several sites which lie around the town and may be considered as part of the Site Allocations DPD in due course. However it is not the favoured location for development from the Town Council as it is considered to be less sustainable than other sites around the town. This site is crossed by a 132kV overhead power line and lies on the favoured route for the proposed Hinkley Point to Avonmouth 400kV link which will have significant impacts on the area for the short and long term. Part of the site lies within the flood plain.

SHL122 Trendlewood Way

28. The site is currently allocated for community uses within the Replacement Local Plan and therefore development for housing would be contrary to this policy at present.
29. The site is being promoted by the land owners and the availability is therefore not uncertain. It is also a site which the Town Council would consider as part of the Site Allocations DPD in due course but the allocation of this site for housing is not guaranteed and therefore it is not considered that the Council should rely on this site in the SHLAA.
30. Furthermore, if the site were to come forward through the appropriate process, the site constraints are unlikely to deliver as many as 40-54 dwellings.

SHL123 Station Road

31. The site is allocated as part of a wider amenity area and an application (08/P/0913/F) for erection of 3 detached houses was refused because of the proposal's visual impact on the area's character, its open nature and harm to the value of this designated amenity area. It was also refused on the grounds of loss of light and overlooking of 62 Station Road. The subsequent appeal was dismissed.
32. The Town Council therefore cannot understand how this site can be considered as "Identified Potential" for between 10-17 dwellings.

Discounted capacity

33. 6 sites in Nailsea are identified within the appendix as being discounted. However, there is no information about those sites and the reasons for their rejection.
34. Sites previously promoted for development in the town have been shared with the Town Council and all of these will form part of the assessment of sites within the Neighbourhood Plan. It will be useful to understand the reasons for the rejection of these sites in the SHLAA as part of that process.

Additional sites

35. There are three sites within the town which the Town Council are aware of which should be considered in future iterations of the SHLAA. A map indicating the location of each is attached, though the detailed boundaries will need to be confirmed with the relevant land owner.

Land at Whitesfield Road

36. This is a 0.23ha rectangular site with road frontage to Whitesfield Road. The site is currently occupied by a garage block with former children's play area at the western end. It is owned by North Somerset Council and pre-application discussions have been held on the development of the site for 9 dwellings.

Former Four Oaks School

37. The site was last used by the education authority as a resource centre which has now closed. It is understood that the LEA are in the process of preparing schemes for the redevelopment of the site for housing.

Sycamore House

38. The site is a former care home located on the edge of the Town Centre. The site is occupied by two storey buildings of modern construction. The buildings are surrounded by mature trees and areas of grass. The site is currently vacant and could provide an opportunity for the sort of housing which is needed in the centre of Nailsea. However, it is unclear if the site owners (the town centre company) will wish to deliver housing on this site or whether a purely retail scheme might be promoted. This will need to be subject of further investigation.

Summary

39. The Town Council is concerned at the way in which the town has been considered in the SHLAA and the assumptions made in assessing sites has led to a document which does not reflect an accurate picture of development opportunities within the district.
40. The Town Council is proposing to prepare a Neighbourhood Plan and as part of that process all land within and around the town will be considered and it is hoped that we can work positively with North Somerset Council in this assessment.

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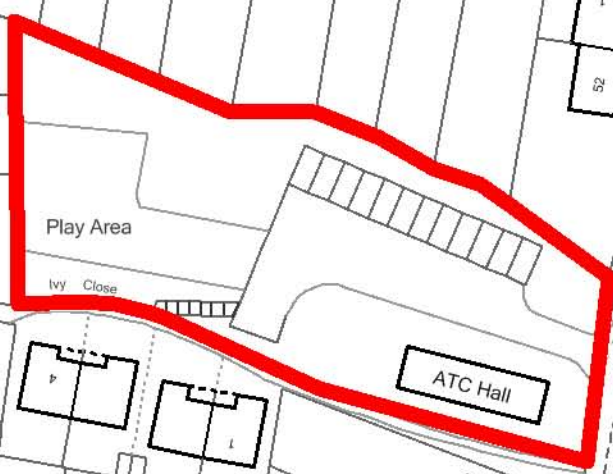
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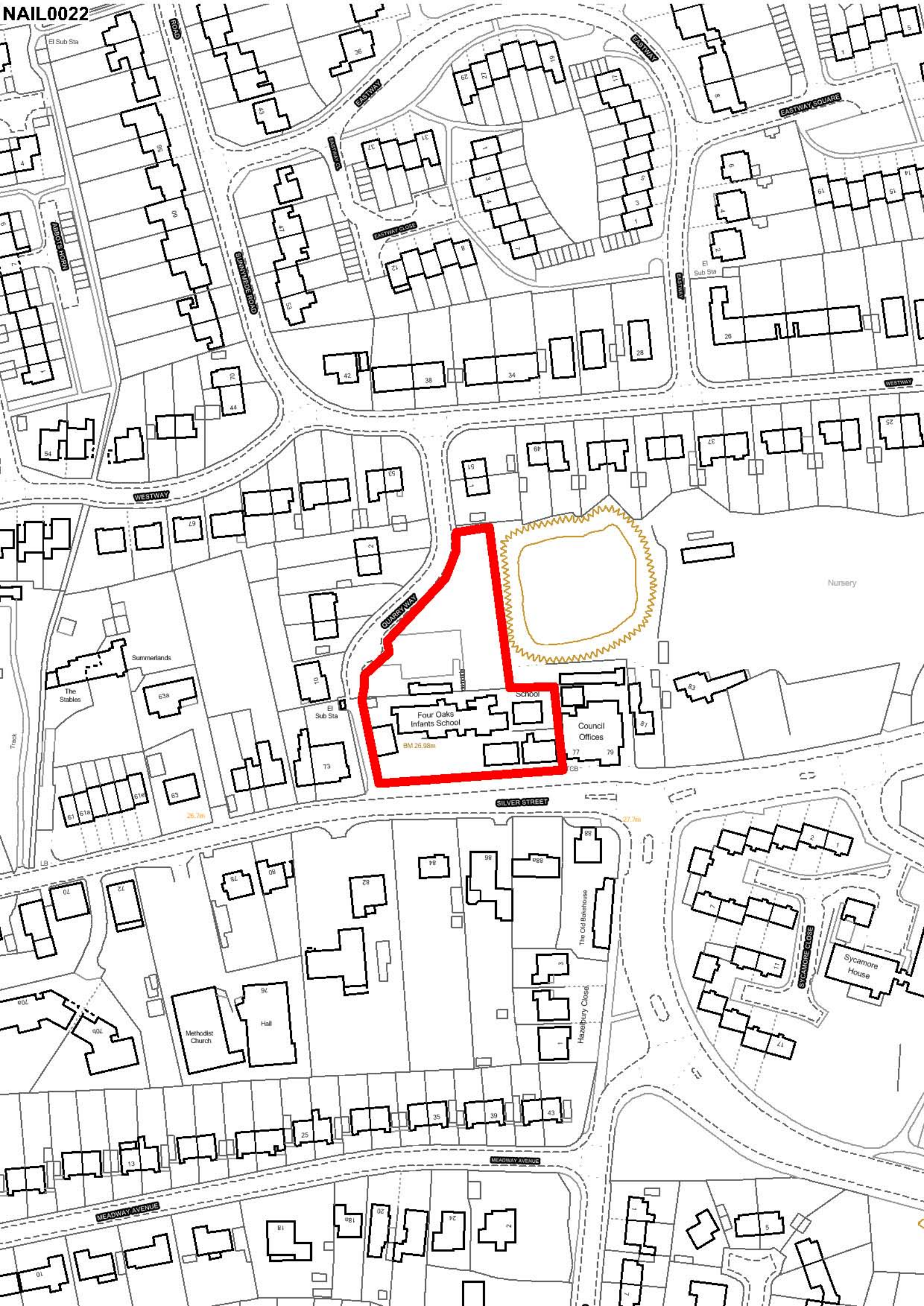
Play Area

Ivy Close

ATC Hall

19.8m

Allo



Four Oaks Infants School

Council Offices

BM 26.98m

Nursery

Methodist Church

Hall

Sycamore House

SILVER STREET

MEADWAY AVENUE

MEADWAY AVENUE

EASTWAY CLOSE

EASTWAY CLOSE

EASTWAY SQUARE

QUADWAY

SYCAMORE CLOSE

The Old Bakehouse

Hazlebury Close

The Stables

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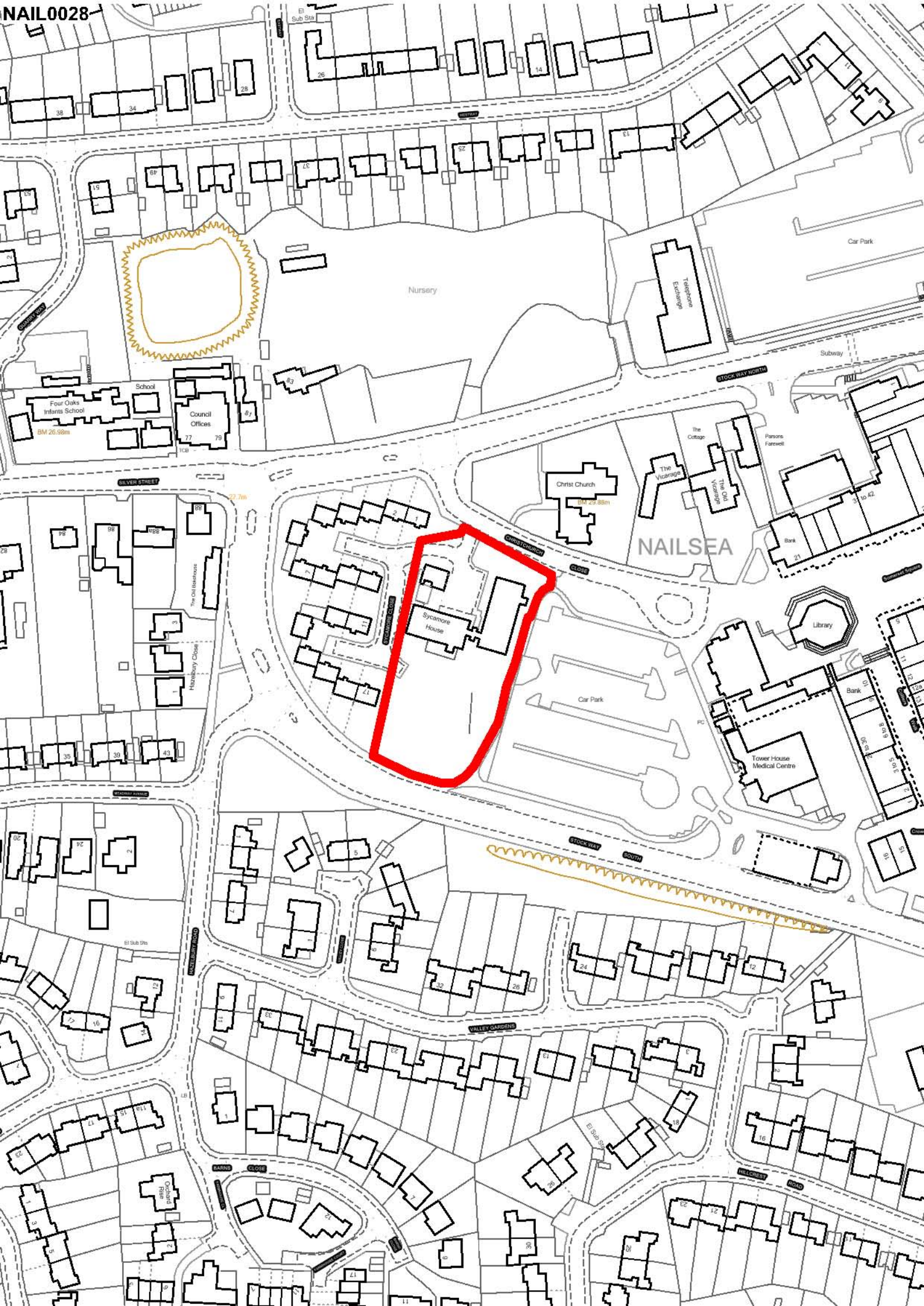
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Nursery

Four Oaks Infants School
Council Offices

NAILSEA

Sycamore House

Christ Church

The Vicarage

The Cottage

Parsons Farwell

Library

Tower House Medical Centre