#### North Somerset Council Core Strategy Consultation **Submitted November 2011**

# gleeson

#### **Position Statement**

on behalf of **Gleeson Developments Ltd** 

#### presentations prepared by:

**Gleeson Developments Ltd Sentinel House Harvest Crescent Ancells Business Park Fleet** Hampshire **GU51 2UZ** 

Telephone: 01252 360300

Fax:

01252 786970

### North Somerset Core Strategy representations Prepared by Gleeson Developments Ltd

#### Introduction

This position statement is prepared by Gleeson Developments Ltd further to representations previously made.

The statement clarifies the position of Gleeson Developments Ltd with respect to the topic headings asked by the Inspector, where they are relevant. Accordingly, it should be read in conjunction with previous written representations.

#### Context

It is important that the Inspector fully understands the context in which the representations are made. Gleeson Developments Limited is promoting 160 acres of land located to the south of Nailsea. The settlement benefits from accessible links to a railway station and highway network. The land being promoted extends the built form towards the station (shown on the attached plan).

The Town Council in their representation acknowledges the need for development on the outskirts of the town which will ensure the continued sustainable growth of the settlement.

In addition, the Core Strategy at paragraph 4.79 states that Nailsea has historically suffered from being planned as a dormitory town which is having an adverse impact on the community. Therefore, the provision of development outside the settlement boundary should be supported to address this point and encourage the viability of the town in its own right.

It can be seen that the land is free from a number of the constraints which affect the rest of Nailsea. The land is not in the Green Belt, which wraps around the settlement to the north, east and south-east and performs an important function. The land is not restricted by the possibility of flooding which is a restriction of other areas around Nailsea. The constraints are illustrated on the attached plan. The land being promoted by Gleeson also has good existing services and infrastructure with no obvious impediments to development and can assist in the Council's requirement to extend the car parking facilities at Nailsea/Backwell station as identified at Policy CS10, bullet point 13.

Gleeson supports the strategy for the future of Nailsea within the plan period. The "vision" for Nailsea as set out within Chapter 2 of the Core Strategy is supported by Gleeson and we believe that this forms an important brief for

development at Nailsea over the plan period. However, it is considered that the plan could provide more certainty in identifying the areas, outside the settlement appropriate for development and increase the number of houses to be delivered for the Town.

Gleeson acknowledges that the Council and Town Council have recognised that housing growth is required across the District to meet housing demand and to deliver infrastructure that will deliver a sustainable future for the town.

As such Gleeson support the overall production and programmed submission of the North Somerset Council Core Strategy, but provide detailed comments on the matters raised by the Inspector below.

#### Issue 1a-d - District Housing Land Requirement

- a. Justification for the revised Core Strategy target of 14,000 dwellings compared with draft RS figure of 26,750
- b. Cross-boundary Implications of the revised housing target for Bristol City and other neighbouring Districts
- c. Potential additional contingency housing land supply

#### d. Housing Needs

The reduced level of housing proposed across North is a concern if the reasoning behind such a reduction is not robust. We are concerned that the level of housing proposed will not meet housing demand and housing needs across North Somerset during the plan period. The Core Strategy should provide for a range of sizes and locations that would also ensure delivery of those sites. The over provision of large scale allocations at Weston-Super-Mare could result in a delay in delivery in the short term. We are also concerned about the specific reference to an average density of 40dph at Weston Villages as this is out-of-date and unrealistic when trying to deliver a wide range of mix, type and tenure that fulfils local need.

As noted by the Town Council the settlement of Nailsea has seen a changing demographic over recent years. There is the need for additional housing to continue to support a sustainable community and address the current imbalance by ensuring young families can stay in the area. This is also identified in the Core Strategy within Policy CS31.

The accessibility of employment opportunities within the settlement is limited and the town already experiences an amount of outward migration. The proximity of the land to the south of the town, next to the train station, ensures that this pattern of out migration can occur in a sustainable manner. A regular rail service from Nailsea to Bristol and Nailsea to Weston ensures that if there was the need for North Somerset to absorb any additional housing from Bristol or Weston, Nailsea would be ideally placed to accommodate this extra housing. However, it also allows for the opportunity to provide a mixed used scheme which could encourage less out-commuting and attract employer's to the area.

It is considered that in a settlement such as Nailsea with a limited housing stock and associated inflated house prices it is evident that affordability of housing is restrictive on existing residents. A low level of new housing being delivered in the town will also mean a low level of affordable housing being provided. As such in order to address housing need and to deliver the Council's ambition of rejuvenating the town centre of Nailsea, Gleeson considers that a significant quantum of residential allocation is required.

We suggest that the Council makes provision for delivery of development in the least environmentally sensitive sites i.e. not in the Green Belt or prone to flooding. The land to the south west of Nailsea is ideally suited for this purpose.

#### Issue 3a-e - Spatial Strategy

- a. The degree of weight to be accorded respectively to the extant RPG10 and the draft Regional Strategy [RS] and the evidence that underpinned the dRS with regard to the overall spatial strategy of the CS its and broad locations for development.
- b. Green Belt implications of the Core Strategy compared the draft RS
- c. SW Bristol urban extension including consideration of its deletion from the Core Strategy compared with the draft RS
- d. Weston Villages developments as the main strategic provision of the Core Strategy, including by comparison with the draft RS provision for an urban extension SE of Weston
- e. Distribution of housing and employment by existing settlement
- i. Weston super Mare
- ii. Nailsea
- iii. Clevedon
- iv. Portishead
- v. Service Villages including appropriateness of designations
- vi. Infill Villages including appropriateness of designations

The Core Strategy consultation identifies housing demand at Nailsea due to its sustainable nature and existing services and facilities within the settlement which the Council has recognised within Chapter 2, vision 4.

A more comprehensive review of how additional residential development could assist in enhancing the town centres/ settlements including Nailsea is required. Gleeson have reservations relating to the overall dispersal of housing across North Somerset due to potential constraints to delivery, however, we do support the recognition of the towns of Clevedon, Nailsea and Portishead as suitable locations for residential development and feel that these settlements should be afforded higher levels of development.

Nailsea will benefit in the long term through the delivery of residential development with associated infrastructure and service improvements which in turn will maintain a diversity of residents within the settlement.

Although we acknowledge that Weston-Super-Mare is the principal settlement within North Somerset we do not agree that Weston-Super-Mare and Weston Villages will be able to deliver a total of 8,800 homes across the plan period. This is linked to the significant delay in delivering strategic sites of this nature and the provision of an average density of 40dph at Weston Villages.

We suggest that the housing numbers within Policy CS14 are amended to increase the provision for the towns 3,400 units to 6,000 units. We think that there should be particular emphasis on reducing the onus on Portishead to deliver 1,091 units between 2011 and 2016. Within the context of volatile financial markets and uncertainty within the housing market which over recent years has depressed housing delivery, this may be difficult to deliver. Accordingly we would suggest an increased housing allocation at Nailsea as a result of its highly sustainable nature and to ensure development can positively affect the town by encouraging a more balanced age structure (CS31) and minimise the likelihood of 'out-commuting' (Para 4.79) by providing mixed use development. The site to the south of Nailsea is deliverable and can be achieved within recognised timescales.

The delivery of additional units at the main towns outside Weston should be achieved with minimal impact upon the Green Belt. This is especially true at Nailsea where the most sustainable location next to the train station can be developed with no impact on the Green Belt.

The purpose of the Green Belt would be to prevent unrestricted sprawl, preventing merging, safeguarding countryside, setting of historic towns and assist in urban regeneration. The development of the Green Belt around Nailsea would be contrary to these clear aspirations.

There is no need to extend or release any Green Belt land and the District Council acknowledge this and do not advocate any review of the Green Belt in this location.

#### Issue 1e-f – District Housing Requirements

- e. Affordable Housing
- i. viability of the 30% benchmark figure
- ii. rural exception sites in Green Belt
- f. Gypsy and Traveller site provision
- i. projected deletion of government guidance circulars
- ii. need for accommodation post-2011
- iii. providing sites in the Green Belt

Gleeson supports the provision of a benchmark of 30% affordable housing, although we believe that the policy should allow a degree of flexibility to ensure that site specific matters such as site conditions can be taken into account during the application process and also so that the policy framework can be varied in order to take account of wider market conditions and housing demand within the locality of the scheme.

We have some reservation regarding the requirement for economic viability assessments to be provided by developers on schemes where affordable housing is required (CS 16 para 3.220). In our experience this will add to the cost of submitting an application and may be unnecessary.

#### Issue 3g-h - Strategic Gaps & Appropriateness of Provisions

- g. Strategic Gaps
- i. Appropriateness of Definition of Strategic Gaps in the CS
- ii. Potential definition of Local Gaps in other DPDs
- h. Appropriateness of Provisions for
- i. Bristol Airport and
- ii. Portbury Dock

Gleeson supports the retention of Strategic Gaps where appropriate, however we consider that their designation should not be accompanied by inflexible policies that restrict all development within a gap. Gleeson advocates that proposals that incorporate development within the Strategic Gap are considered on a site by site basis as development associated within a Strategic Gap location may be the most sustainable location for such development.

Our comments are focused in particular on the strategic gap to the south of Nailsea. Is there a need for a gap between the modest settlement of Backwell and Nailsea necessary and is it of strategic importance. It is suggested that this area does not need the protection afforded by such a designation as the land does not form a strategic function. Visually the settlements would remain separate without this designation and the importance of the separation is not justified in the context of the policy.

It is considered that the gap between Nailsea and Backwell warrants the designation of Strategic Gap. The settlements are not significant in terms of size and the gap cannot be seen when within it. As such the designation is unnecessary.

The railway line provides a physical boundary to the landscape setting of Nailsea and also importantly providing a significant boundary between Backwell and Nailsea. Accordingly we do not perceive that the Strategic Gap within this location provides a feature that could not be provided as part of a residential extension to Nailsea.

These comments outline the position of Gleeson Developments Limited and we will be happy to clarify or expand upon this statement at the Hearings as appropriate.

Gleeson Developments Ltd

## Plans showing extent of: Green Belt around Nailsea

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Extent of area prone to flooding.



