

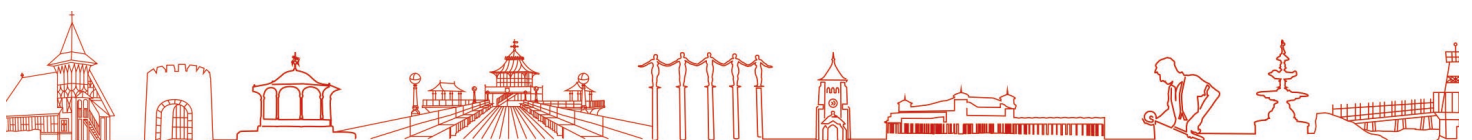


North Somerset Local Plan 2039

Ensuring the vitality of our Town Centres

Topic Paper

November 2023



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1. Introduction

- 1.1 This paper sets out the policy and context for Town Centres within North Somerset up to 2039. It looks at the national policy context, followed by current local policies and work which has and is being done to revitalise the centres of the main towns in North Somerset (Weston-super-Mare, Clevedon, Nailsea and Portishead) to ensure their continued vitality and viability.

2. National policy and trends

National Planning Policy Framework (NPPF as revised 2023)

- 2.1 The NPPF represents the Government's position on planning policy. It is a material consideration in plan making and planning decisions. The most up-to-date iteration of the **National Planning Policy Framework (NPPF)** was published on 5th September 2023 and sets out the Government's planning policies for England and how these should be applied (paragraph 1).
- 2.2 The NPPF advocates a 'town centres first' approach and requires planning policies to positively promote competitive town centre environments and manage the growth of centres over the plan period. In planning for town centres Local Planning Authorities should (paragraph 86):
- a) define a network and hierarchy of town centres and promote their long-term vitality and viability – by allowing them to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, allows a suitable mix of uses (including housing) and reflects their distinctive characters;
 - b) define the extent of town centres and primary shopping areas, and make clear the range of uses permitted in such locations, as part of a positive strategy for the future of each centre;
 - c) retain and enhance existing markets and, where appropriate, re-introduce or create new ones;
 - d) allocate a range of suitable sites in town centres to meet the scale and type of development likely to be needed, looking at least ten years ahead. Meeting anticipated needs for retail, leisure, office and other main town centre uses over this period should not

be compromised by limited site availability, so town centre boundaries should be kept under review where necessary;

e) where suitable and viable town centre sites are not available for main town centre uses, allocate appropriate edge of centre sites that are well connected to the town centre. If sufficient edge of centre sites cannot be identified, policies should explain how identified needs can be met in other accessible locations that are well connected to the town centre; and

f) recognise that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites.

2.3 Further proposed changes to the NPPF were consulted upon in December 2022, however none of these related to Town Centres or retailing and a revised NPPF is still awaited.

2.4 The Governments **Planning Policy Guidance** which is not policy but technical guidance was updated in 2019 and states (para 1) that:

“Local planning authorities can take a leading role in promoting a positive vision for these areas, bringing together stakeholders and supporting sustainable economic and employment growth. They need to consider structural changes in the economy, in particular changes in shopping and leisure patterns and formats, the impact these are likely to have on individual town centres, and how the planning tools available to them can support necessary adaptation and change.”

2.5 The guidance also encourages “pop up” /meanwhile uses and expansion of the evening and nighttime economies to increase economic activity and provide additional employment within town centres.

Changes to the Use Class Order and potential impact on town centres

2.6 Introduced in September 2020, Class E brought together a number of former uses under one broad ‘commercial, business and service’ heading and permits changes of use between shops, restaurants, cafés, clinics, crèches, banks, offices, light industrial, indoor sports to another (or multiple and changing uses across the whole day) use within the use class E. It covers many of the activities traditionally found in high streets or town centres and is intended to support flexibility and diversity and help high streets and town centres better respond to the negative

consequences of the Covid-19 Pandemic (external changes will probably require planning permission if not permitted by the General Permitted Development Order).

- 2.7 Bringing these uses together and allowing movement between them gives businesses greater freedom to adapt to changing circumstances and to respond more quickly to the needs of their communities.
- 2.8 This applies to any Class E use wherever located, so is not just relevant to town centres.

Permitted Development Rights

- 2.9 New permitted development (PD) rights to allow the change of use in England from any use, or mix of uses, from the Commercial, Business and Service use class (Class E) to residential use (Class C3) was introduced under Class MA of the Town and Country Planning (General Permitted Development etc.) (England) Order 2021. It came into effect in August 2021.
- 2.10 There is a size limit of 1,500 sq metres of floorspace to avoid the loss of larger units such as anchor/ department stores and the building must also have been in a commercial, business, or service use for at least two continuous years previously.
- 2.11 This allows unused commercial buildings to be granted permission for residential use via a fast-track prior approval process which can only take into account flooding, noise from commercial premises and adequate light to habitable rooms (also includes the include the impact of the loss of a health service) and in Conservation Areas the impact of the loss of a ground floor Class E use. These considerations will be applicable in North Somersets town centres in particular Weston-super-Mare where there are a number of large vacant units, some of which have been vacant for more than two years.

Sectoral Changes.

Convenience sector

- 2.12 There have been a number of recent changes in the retail sector, with Covid-19 also having an impact on shopping patterns. The recent trend for smaller “express-type” supermarkets close to where people live/work

is continuing with only Aldi and Lidl expanding the number of stores in preference to improving the offer within stores.

Comparison sector

- 2.13 This sector has seen a dramatic change with the closure of retail chains within North Somerset such as BHS (Weston Town Centre) and all stores within the Arcadia umbrella (Top Shop, Top Man, Dorothy Perkins, Evans and Burton) all of which other than Evans being previously present in Weston-super-Mare Town Centre. These chains have been sold to online operators such as Boohoo and ASOS. The recent closure of Wilko leaves another gap in Weston-super-Mare Town Centre. Other operators such as Marks and Spencer have moved out of Weston Town Centre favouring an M&S simply food outlet in an out of centre retail park.
- 2.14 These closures have changed the face of our high streets and town centres. In particular Weston-super-Mare Town Centre out of the four North Somerset towns has been affected by these changes and has seen a significant shift in the type of retailer present. In many cases, if these units have been taken up they are by discount or low value retailers, or the now ubiquitous coffee shops.

Online and click and collect

- 2.15 The trend in online shopping has continued to grow putting additional pressure on the traditional high street/town centre. Click and collect using partner stores/locations also removes the need for a physical store presence.

Covid -19

- 2.16 The shift to home working during the pandemic led to more local shopping where a local option was available, with corresponding reduction in town centre shopping in many cases. There has been an increase in vacant town centre units such as within the Sovereign centre in Weston-super-Mare.
- 2.17 More recently there has been some rebalancing of this trend but hybrid working is still prevalent amongst office workers meaning less footfall in town centres than prior to the Covid 19 pandemic.

Summary of national policy and structural changes in relation to Town Centres

- 2.18 The concept of identifying a Town Centre hierarchy, Town Centre area, primary shopping area and a sequential approach to locating Town

Centre uses is still embedded in National Policy and guidance (an approach which the current policy framework in North Somerset follows - see section below).

- 2.19 However, with recent greater flexibility over changes of use within Town Centres and less emphasis on retail as a core Town Centre use, typical frontage policies have become less relevant. Although local planning authorities can still exert control over new uses/buildings within Town Centres (for example allow retail over other uses in a primary shopping frontage), once the use is in place there is no ability to restrict this to retail or any other use.
- 2.20 Town centres are redefining themselves as places to meet and socialise as well as shop, with the changes resulting from COVID-19 now more bedded in. This has informed the Local Plan approach to Town Centre policy and retail/town centre use allocations.

3. North Somerset Town Centre policy and trends

Trends

- 3.1 North Somerset is served by four town centres: Weston-super-Mare, Clevedon, Nailsea and Portishead; four district centres; 18 local centres and various out of centre retail areas. There are also significant retail offerings in close proximity to North Somerset at Cribbs Causeway, Bristol City Centre and Taunton. Retail areas throughout the district are monitored annually to record any changes in occupancy and vacancy rates. The last published data relates to 2022 and is shown in the table below alongside recent survey data from October 2023.

Table 1: Retail Occupancy and Vacancy Rates for North Somerset Towns and Primary Retail Frontages 2022 and 2023 (in red)

Units/Town	Weston- super-Mare	Portishead	Clevedon	Nailsea
Total units	629 631	135 134	151 152	165 165
Vacant units	125 115	0 7	12 15	22 24
% of vacant units	20% 18%	7% 5.2%	8% 9.9%	13% 14.5%
Total PRF units	157 158	76 75	61 61	46 46
Vacant PRF units	36 26	7 5	6 6	9 8
% of vacant PRF units	23% 16%	9% 5.2%	19% 9.8%	20% 17.4%
% of total units in Ea use	33% 32.6%	48% 47%	39% 38.8%	41% 38.8%
% of total PRF units in Ea use	53% 55.1%	53% 52%	59% 60.7%	70% 63%

- 3.2 The existing Core Strategy (2017) and Development Management Plan (2016) policies retain primary shopping frontage policies as they were adopted prior to the NPPF changes which removed this. For sake of continuity until the emerging Local Plan is adopted the monitoring of town centre uses currently retains this distinction.
- 3.3 Despite the changes in PD rights and Use Class order, policy indicators and targets still state that in defined town centres the proportion of primary retail frontage (PRF) units in a non-retail use should not exceed 30% and vacant units should not exceed 10%. This 30% figure isn't met over the last two years for any of the town centres. Although Nailsea PRF did have an Ea use of 70% in 2022 meeting the target of retail uses

in the PRF, this has fallen to 63% in 2023. Portishead and Clevedon PRF do not exceed 10% vacancies and show a year on year improvement on previous years across all of the Town Centres PRF's.

- 3.4 Our town centres are slowly recovering from the Covid-19 pandemic and the resulting national lockdowns which negatively impacted retail businesses. The impact of sectoral changes, permitted changes and online shopping however is evident in the types of use within the town centres and primary shopping frontages.

Local Policy Framework

- 3.5 A retail study was prepared for North Somerset Council by Donaldsons in 2006 as part of the preparations for the Core Strategy and other Local Development Framework documents. A refresh of this study was undertaken by GVA Grimley Ltd in 2010 in response to the change in the economic climate and to support further work being undertaken on Local Plan documents. This informed the current suite of adopted development plan documents, namely the Core Strategy, Site Allocations Plan and Development Management Policies plan.

Existing Core Strategy approach

- 3.6 The Core Strategy 2017 policy CS21 sets out a hierarchy of centres as required by the NPPF. Development Management Plan Policies DM60-DM67 carry this forward to the detailed level and set out primary shopping areas, primary shopping frontages (a requirement of the previous version of the NPPF, although abandoned now) and the sequential approach to retail development.
- 3.7 The Core Strategy was originally adopted in 2012 but housing and related policies were remitted and the whole Core Strategy was finally adopted in April 2017. Retail policies remained unchanged between the 2012 and 2017 versions.
- 3.8 In response to the retail studies undertaken no retail allocations were made outside of the new development areas. Dolphin Square in Weston-super-Mare was identified as a mixed use redevelopment opportunity and a supplementary planning document was produced to guide the masterplanning of the site. It has been partially redeveloped for a mixture of Town Centre uses as an extension to the High Street. Because of the change in fortunes of the retail and wider economy the remaining half of

the proposed redevelopment has not come forward and is allocated in the Site Allocations Plan for residential use.

New Local Plan: Preferred Options Consultation (March 2022)

- 3.9 The Preferred Options Local Plan approach to Town Centres carried forward the Core Strategy approach in line with the NPPF, but omitting a policy for the protection and retention of retail uses in shopping frontages, as this no longer formed part of the NPPF.
- 3.10 Draft policy LP7 set out the Town Centre hierarchy unchanged from the Core Strategy approach. Draft policies DP23 - DP28 reiterate DM60-DM67 with the exception of the removal of the primary shopping frontage policy.
- 3.11 Consultation on the Preferred Options Plan elicited a low level of response to the town centre and retail policies, but with a high level of support expressed to the policies as written. It was suggested that additional detail could be expressed about the Wyndham Way area in Portishead and this will be picked up in the Pre-submission version of the Plan. This is also referenced in the placemaking work for the four towns as set out in the section below.

Employment Sites and Premises Study (October 2023)

- 3.12 A high level Employment Sites and Premises Study was undertaken and published in October 2023 for North Somerset focusing on uses E(g), B2 and B8 but also included a high level retail analysis. This equated the additional numbers of jobs needed in the retail Ea) sector to future floorspace requirements. The estimated range of employment numbers is between 460-570 which equates to a floorspace requirement of 7,500-9,100sqm 2023-2043.

Local Plan 2039 Town Centre allocations and policy approach

- 3.13 The low level of response to the retail and town centre policies at Preferred Options stage and the nature of the responses received at that stage indicated a general satisfaction with the policies as proposed. Given the structural changes to retailing and Town Centres together with the low estimated need for additional floorspace/jobs it is felt that the Town Centre policies proposed offer an adequate method of assessing

proposals for Town Centre uses which may come forward over the Plan period, without the need for additional allocations.

- 3.14 The exception to this is a new Local Centre which is currently proposed for the new Wolvershill development area under policy LP1 (the expected area is 2ha, although no specific size will be proposed to be allocated in the Local Plan as this will be subject to master planning). The Local Centre will encompass a variety of Town Centre uses to provide the new community with a focus for activity and services.
- 3.15 North Somerset Council's alternative approach has therefore been to focus on placemaking rather than floorspace and on a wider set of measures which could make the most of our existing Town Centres, to enhance or repurpose sites including "meanwhile" temporary uses for vacant units or public realm enhancements.

Placemaking

- 3.16 In the face of the changing nature of our town centres North Somerset Council has undertaken Placemaking work for all four of the towns. The visions, priorities and actions identified within the strategies are intended to feed into relevant council strategies and plans, including where appropriate the Local Plan. Details of the placemaking strategies are set out below.

Weston-super-Mare

- 3.17 Weston town centre has become the focus for investment with the redevelopment of Dolphin Square for leisure and hospitality uses and more recently through two Heritage Action Zones (HAZ) and the production of the Weston Placemaking Prospectus.
- 3.18 The [Weston-super Mare Placemaking Strategy](#) sets out a vision and ambition for a ten-year programme of project delivery to help Weston become a healthier, greener, and more prosperous place to live, work and enjoy. It recognises the longer-term effects of the pandemic on the town centre and visitor economy and the move away from a retail focus within the town centre to more emphasis on the visitor/experience economy and recommends that this should be reflected in any development proposals for the town centre.
- 3.19 Much of Weston town centre lies within the Great Weston Conservation Area (Civic Quarter, High Street, Orchard Meadows and The Boulevard). Heritage plays an important role in creating an attractive and

economically sustainable place. The restoration and improvement to the historic fabric such as the repair and re-use of historic buildings and enhancements to pedestrian and cycle routes into and around the town centre and to the seafront are important components of increasing the appeal of the Town Centre as a destination.

- 3.20 The [Strategy](#) was commenced before the COVID-19 pandemic however the impact of COVID-19 was considered as projects and programmes were developed. The ambition is that the Strategy will support the council and its partners to secure public funding and private investment to the town.
- 3.21 Regardless of the economic impact of Covid-19, residential and commercial values are simply too low compared with the costs of construction and borrowing, such that the return on investment does not warrant the financial risk. Therefore, sites like TJ Hughes (on the High Street) and Dolphin Square have sat vacant for several years with little progress on delivery. The intention is for a programme of placemaking activity and use of a high-quality new place identity to grow values over time, such that investment can be attracted to deliver mixed use development. This could mean a series of lighter, quicker and cheaper projects that, while granular in scale, can derive a cumulative impact on value in the town.
- 3.22 Although lying at either end of the sea front and outside the town centre area the Tropicana and Birnbeck Pier provide important anchor points and a focus for uses and activities which can complement the town centre economy, extending the zone of activity out from the central area.
- 3.23 As well as a variety of actions around branding and use of assets, events, communications and concessions which may all impact on the perception of the Town Centre area as a thriving place to visit, work and live in the following actions are identified:-
- Encouraging housing on key sites and homes on upper floors.
 - Promoting independent retail and turning surplus retail space into homes, business premises, arts, cultural and community spaces
 - More and better quality homes within the town centre area by rebuild and re-use for rent or sale including affordable homes and improving the offer of the private rental sector.
 - Identifying sustainable future uses for key buildings such as the Tropicana and Old Magistrate's Court.
 - Repurposing of underused parts of the Sovereign Shopping Centre and car park.
 - Expansion of Weston College and University Centre Weston including additional student accommodation

- Carbon neutral infrastructure for safe cycling/walking and public transport, local renewable energy generation on buildings.
 - Rewilding planting routes down High Street and Orchard Street.
- 3.24 Proposals which contribute to public realm enhancements, increase the attractiveness and accessibility of the town centre and promote better connectivity between the seafront and High Street are supported in the Strategy and re-enforced in Policy DM23 of the Preferred Options Plan. This approach should continue in the Pre-submission Plan (Reg 19).
- 3.25 Along and adjacent to the sea front giving priority to entertainment, arts, culture and leisure uses, tourist facilities and accommodation will continue to support the strategy. This includes development/redevelopment of the Tropicana. Policies should also ensure that proposals should not prejudice the viability and vitality of the Primary Shopping Area and should complement activities in the town centre. Priority should continue be given to the re-use of underused sites.

Nailsea and Clevedon: Two Towns Placemaking Strategy

- 3.26 During 2021 and 2022 North Somerset Council with the support of Design West Community Interest Company, worked with local communities, business interests and the town councils to develop placemaking strategies for Clevedon and Nailsea, with a focus on the town centres. This offered local people the opportunity to shape visions for the future of their towns, which had not benefited from placemaking programs in the past. The initiative was termed the “Two Towns” program, as the projects were prepared concurrently, using similar methodologies and the same professional team.
- 3.27 The strategies explore how to adapt and re-invigorate the heart of the towns to meet the needs of communities for new homes and leisure, culture and commerce through short and long-term changes. Action plans were prepared for placemaking activities to generate local investment, support health and wellbeing and responses to the climate emergency.

Nailsea

- 3.28 The [Nailsea Placemaking Strategy](#) recognises as a priority regenerating the Town Centre through renewal, retrofitting, improving townscape and generating mixed use and outward facing active frontages and by bringing new homes into the town centre.

Key actions were:

- Maintain the role and presence of the library in the town centre.
- Develop a shared vision for Crown Glass Place to guide short and long term investment.
- Establish a Business Improvement District (BID).
- Support a “meanwhile strategy” to support evening activity and designer makers/independent businesses to bring empty shops and public spaces back into use.
- Encourage cyclists to choose the town centre as a destination, support active travel and public transport.
- Cultural heritage strategy modelled on the Culture Weston Framework.
- Public realm improvement to the High Street and Village Green.

3.29 Based on the “Two Towns” findings for Nailsea, Town Centre policies relating to Nailsea should therefore support and reflect the following:

- Expanding the range of uses to include leisure as well as co-working space, culture and “makers” as well as evening destinations.
- The potential for concentrated activity around the west end of the Town Centre and Somerset Square in particular for leisure, retail, recreational and play spaces should be reflected in development proposals.
- Proposals should aim where appropriate to improve connections to Somerset Square and extend the greenness of the town centre improving the High Street and Village Green.
- Development which promotes better linkages from the town centre to adjacent areas including Millenium Park and residential neighbourhoods will be supported.
- Development proposals along the high street should respond to the historically distinctive fine-grained character.

Clevedon

3.30 The [Clevedon Placemaking Strategy](#) recognizes that Clevedon has a strong Victorian heritage with a focus today on the seafront and pier, Hill Road shops, and the historic town centre (which includes the Curzon Cinema and Queens Square) which is in need of regeneration.

Key priorities are to:-

- Promote locally responsive architecture, adding to 19thC and seaside identity.
- Reconnect the town centre and enhance public spaces to create new destinations and improve the setting historic streets and buildings.

3.31 The highest priority actions are for:-

- Queens Square, Public Realm Improvement - Animate and improve the space contributing to the sense of place and increasing cultural/economic activity.
- Active travel campaign - Encourage modal shift to walking, cycling and public transport.
- Clock Tower, Triangle and Old Church Road improvement - Improve the place of the street and enhance the environment for visitors and businesses.
- Town centre bus and cycle hub - Encourage cyclists to choose the town centre as a destination and to encourage and support active travel and public transport.
- Meanwhile Strategy - To support evening activity in the town centre.

3.32 Town centre policies and proposals for Clevedon should therefore support these aims.

Portishead

3.33 The Wyndham Way Development Area lies within the general Town Centre area of Portishead but outside the primary shopping area. Work commenced in 2020 to develop a [Wyndham Way Development Framework](#) which would promote better connectivity within the whole Wyndham Way area including the town centre, proposed railway station site and the marina. It is predominantly a large brownfield site, made up of numerous individual land ownerships and uses. Priorities are:-

- Introduce good planning urban design principles for 20 hectares of previously developed land within Portishead town centre.
- Make connections across the site, particularly for pedestrians and cyclists who are currently poorly served.
- Make the most of emerging improvements to public transport, including though MetroWest Phase 1b, the reopening of the Portishead to Bristol rail line and improved bus services.
- Ensure there is a supply of good quality workspace to increase the local employment capacity and meet the needs of existing and new ways of working.
- Provide new homes across multiple tenures including genuinely affordable housing.

3.34 The Development Framework document provides a framework for change including principles for green infrastructure, better connectivity and more efficient land uses across the area and which can co-ordinate

change. This approach helps to set a clear direction of travel and coordinate designs so that they add up to deliver the vision. This includes planning the network of streets and spaces and considering different uses. It takes account of existing uses which may not change for a long time, as well as being flexible enough to allow land-owners to develop a range of different options.

- 3.35 A delivery strategy is needed to identify how intervention could accelerate development in the area. The outcomes are intended to be fed into the submission version of the Local Plan in April 2024.
- 3.36 Local Plan policies should therefore ensure that any development proposals should adhere to the principles of the Development Framework.

Conclusion in relation to placemaking at the four Town Centres

- 3.37 Although the specific actions for each town are different there are general principles from each study which should apply to the Town Centre policy in the Local Plan these being:-
- Enhancement of the distinctive character of each town centre, reflecting the identity of each and the heritage of individual buildings.
 - Higher densities on underused, poor quality or vacant land and efficient use of upper floors where appropriate to increase town centre footfall.
 - Proposals which create interest at street level with active frontages.
 - Public realm enhancements and prioritisation of walking and cycling to create legible, attractive and accessible Town Centres.
 - Retail and other complementary uses at ground floor level should be supported which encourage footfall and create an active and vibrant town centre.
 - Policies should encourage proposals which extend activities into the evenings in a way which is safe and enhances the character of the town centre.
- 3.38 More specific proposals should accord with the principles of the individual Placemaking studies.

4. Overall conclusions

- 4.1 The recent changes in the retail and town centre environment including the impact of sectoral changes, Covid 19 and nationwide changes to the Use Class Order and Permitted Development Rights, requires a placemaking emphasis to town centres rather than relying solely on a land use policy approach to North Somerset's Town Centres.
- 4.2 The Local Plan 2039: Pre-submission Plan largely reflects the existing policy approach which is still relevant and applicable, but places a greater emphasis on the place-making strategies for the towns and development proposals should support the individual aspirations of the four placemaking studies which were undertaken in North Somerset.