

North Somerset Local Plan 2038

Urban Intensification Interim Report

April 2021

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1. Introduction

This paper aims to quantify the number of new homes which could be provided within the four towns of Weston-super-Mare, Clevedon, Nailsea and Portishead during the new Local Plan period (2023-2038).

- **It identifies a list of sites which do not have a current planning permission but have the potential to be delivered during the plan period and makes an initial assessment about the potential number of homes on each. Further testing will be required to consider appropriate densities for each site. Suitable sites would be considered for inclusion as allocations, or within the new growth or renewal areas in the Local Plan.**
- **It identifies a further list of sites which have been considered but which are not currently regarded as likely to be redeveloped during the plan period. Many of these sites have redevelopment potential but deliverability is uncertain. Some could come forward either in the long-term or if intervention measures to aid redevelopment were introduced. These sites are less likely be allocated in the Local Plan due to the uncertainty. However, if the more zonal approach being advocated in the White Paper is adopted then these may be within the renewal areas. Other sites have been considered but ruled out on the grounds that the current use is still required, or the site is unsuitable for residential use.**
- **It considers what opportunities might arise from windfalls. This will aim to take on board possible changes post-pandemic such as any economic downturn and the potential from changes to permitted development rights.**

Comments are invited especially from the Town Councils but also from others regarding the sites and in identifying additional sites which could be assessed.

2. Policy Background

Government policy is clear that the strategy for meeting housing need should make as most use as possible of previously developed land or 'brownfield land'. (NPPF para. 117) Prioritising the reuse of brownfield land is an important element of the overall approach to delivering sustainable development through addressing economic, social and environmental objectives and supporting the climate change agenda and has been embedded in government guidance and North Somerset planning policy for many years. Indeed, many of the large housing developments built over the past few decades have taken place on brownfield land. For example, major housing developments at Ashlands in Portishead, the redevelopment of former hospital sites, Parklands at RAF Locking and Haywood Village on the site of the former Weston Airfield.

The response to the new Local Plan Choices consultation showed overwhelming support for maximising brownfield land in towns. 908 respondents (60%) strongly supporting maximising the use of brownfield land and 380 respondents (25%) supporting this approach. Therefore, out of the people who answered this question 85% of respondents favoured this approach.

Whilst many of the very large brownfield sites have now been redeveloped there are still opportunities within the towns which can be used. Making the best use of these sites not only reuses land but can aid regeneration. It ensures development takes place close to existing jobs, facilities and services and is often well connected and accessible.

3. Study area

This study focussed on identifying all land within the four towns of Weston-super-Mare, Clevedon, Nailsea, and Portishead which could be suitable for residential development. The current settlement boundaries are used to define the study area. The urban area at Weston-super-Mare includes the land within the settlement boundary at Parklands and Haywood Village. The maps in Appendix 1 shows the extent of the area.

4. Lists of sites

Sites within the settlement boundaries of the four towns have been compiled from a range of sources and assessed. These sources include:

- **Strategic Housing Land Availability Assessment (SHLAA).** The call for sites from landowners and developers which informs the 2021 SHLAA has identified a number of sites. All sites within the settlement boundaries of the towns included in SHLAA have been assessed. Whilst the SHLAA identifies the sites and makes an initial assessment about potential based on constraints, this study makes a further judgement regarding increased density and deliverability.
- **Existing allocations.** Unimplemented Allocations without a current planning permission in the Site Allocations Plan have been reassessed to determine if they are still likely to be brought forward for development.
- **Pre-application enquiries.** Enquiries about sites within the towns have been assessed to determine potential.
- **Other known opportunities.** These have been actively identified from previous plans, work to produce masterplans and ongoing place-making initiatives.

This has resulted in two lists of sites.

1. Those sites identified as having **potential for development** within the plan period together with a generic assessment of their residential capacity. These are included in Table 1 and the Maps in Appendix 1. At this stage these have been assessed at a high level as probably suitable, available and achievable.

The sites or capacities should not be regarded as having any status or confer any likelihood for granting planning permission.

2. Those sites which have been **considered but excluded** at this stage. The list details sites which may have some potential and sites which have been discounted. Some of the sites with potential could come forward if intervention measures are taken, particularly regarding land assembly and remediation however information on these sites is insufficient to give any certainty of numbers or delivery at this stage. As the plan progresses this may change, and additional sites would be included in the list of identified sites. Sites which are discounted includes sites currently in productive use which is either seen as unlikely to change or which could be safeguarded and sites unsuitable for residential use. The list is included in Appendix 2.

Table 1: Identified potential in the Plan period

Location	Source of site identification	Comments on capacity	Estimated capacity	Map ref
Sunnyside Road, Weston-super-Mare	SHLAA	Assumed density of 100dph achievable	120	W01
Locking Road Car Park, Weston-super-Mare	SHLAA	Assumed density of 100dph achievable	230	W02
Dolphin Square, Weston-super-Mare	SHLAA	Assumed density of 100dph achievable	80	W03
Gas works, Weston-super-Mare	SHLAA	Early masterplanning exercise taking account of developable area suggests 95 dwellings	95	W04
Former Bournville School site, Selworthy Road, Weston-super-Mare	SHLAA	Assumed density of 40dph	48	W05
Lynton House Hotel, Madeira Road, Weston-super-Mare	SHLAA	Capacity taken from recent application proposal	40	W06
Land to the rear of Locking Road, Weston-super-Mare	SHLAA	Assumed density of 40dph	12	W07
Land at Nightingale Court, Mead Vale, Weston-super-Mare	SHLAA	Capacity taken from recent application proposal	34	W08
Land to the west of Winterstoke Road, Weston-super-Mare	SHLAA	Assumed density of 40dph	134	W09
Hotels off Knightstone Road, Weston-super-Mare	SHLAA	Assumed density of 100dph achievable	40	W10
Police Station/Magistrates Court/Victoria Church, Weston-super-Mare	SHLAA	Assumed density of 100dph achievable	70	W11
Former Sweat FA site, Winterstoke Road, Weston-super-Mare	SHLAA	Capacity taken from recent pre-application proposal	37	W12
Rugby Club, Weston-super-Mare	Recent pre-application	Capacity taken from recent pre-application proposal	200	W13
Woodspring Stadium, Weston-super-Mare	Recent pre-application	Capacity taken from recent pre-application proposal	100	W14
Former Police Depot, Winterstoke Road, Weston-super-Mare	Actively identified	Assumed density of 40dph	36	W15

Location	Source of site identification	Comments on capacity	Estimated capacity	Map ref
Leisuredome site, Locking Parklands, Weston-super-Mare	Actively identified	Assumed density of 40dph	216	W16
Millcross, Clevedon	SHLAA	Capacity taken from recent pre-application proposal	67	C01
Land north of Churchill Avenue, Clevedon	SHLAA	Assumed density of 40dph	44	C02
Great Western Road, Clevedon	Recent application	Capacity taken from recent application proposal	39	C03
Trendlewood Way, Nailsea	SHLAA	Capacity taken from recent application proposal	24	N01
Weston College site, Somerset Square, Nailsea	SHLAA	Capacity taken from recent application proposal	28	N02
Old Mill Road, Portishead	SHLAA	Capacity taken from recent application proposal	350	P01
Downside, Portishead	SHLAA	Assumed density of 40dph	24	P02

5. Estimating capacity and increasing densities

National planning guidance is clear that efficient use should be made of land and that where there is a shortage of land for meeting housing needs it is important that planning policies should avoid homes being built at low densities. (NPPF para 122-123). It states this will be tested robustly at examination and that minimum density standards should be set in town centres and other locations well served by public transport and that there should be an uplift in average densities in these areas.

Currently Policy CS14 of the adopted North Somerset Core Strategy states that 'residential density will be determined primarily by good design. The target net density across North Somerset is 40 dwellings per hectare, although this may be higher at highly accessible locations, and less in sensitive areas or where lower density is positively encouraged.' Current policy makes no specific mention of target densities in town centres or transport hubs.

The residential capacities in this study are derived from one of the following:

- Numbers submitted in a pre-application, or application.
- Numbers derived from any design, master planning or place-making studies.
- Numbers submitted in the call for sites
- Where no indicative number is available from the above an indicative density of 100dph is used for sites in town centres and near existing or proposed railway stations/transport hubs and 40 dph elsewhere in the settlement. These densities are used to for the purposes of calculating numbers in this study only. They should not be used as a guide for what will be required on site. Densities in towns will vary and could be significantly higher or lower depending on the characteristics on the site. Policies in the plan will seek the optimal use of land and seek an uplift in densities in key locations. Density requirements will be included in the allocation where appropriate. Capacities recorded in the SHLAA are calculated at 40 dph in the absence of an anticipated density figure. 40 dph would be considered to be at the minimum

end of the range in most urban setting unless there were specific design and character issues.

Sites will be further assessed during the plan making process to ensure optimal use is made of land and that appropriate densities are set.

6. Total capacity on identified sites

The total number of units identified on the above sites is **2,068 units**. The majority are in Weston-super-Mare (1492). 374 in Portishead, 150 in Clevedon and 52 in Nailsea.

7. Place-making initiatives

The council is currently involved in a number of placemaking and public engagement activities in Portishead, Nailsea and Clevedon that could identify more opportunities and capacity in these towns. Some of these are at an early stage and could result in a significant uplift in capacity. Further sites and capacities will be added to the list of potential sites as this work progresses.

8. Estimating numbers from windfalls

A supply of residential sites comes forward each year from windfalls. These can be from both small (less than 10 units) or larger sites. They include development on previously developed land, residential gardens and through subdivision and conversion of buildings.

A windfall estimate for the towns can be made by considering past trends and by forecasting whether these are likely to change in the future.

Small site windfalls for the four towns during the Core Strategy period has amounted to 1609 units in the 14-year period to 2019/20. The average number of windfalls over the total Core Strategy period equates to 115 per year.

Basing future windfalls on the average of these years the new Local Plan would be expected to deliver 1725 units in the towns.

Windfall by town over the past three years

Windfall completions within towns by year (number of dwellings)				
	2017/18	2018/19	2019/20	3 year total
Clevedon	25	26	25	76
Nailsea	4	32	63	99
Portishead	8	22	60	90
Weston	60	84	57	201
TOTAL	97	164	205	466

By using the latest data from the past three years it is possible to look at where windfalls are taking place, assess where they are coming from and whether there are any discernible trends which might influence future supply. The last three years has been used as there have been considerable changes to permitted development rights during this time. However, it is acknowledged that it is pre-pandemic. Long-term changes as a result of the pandemic are likely but as yet uncertain.

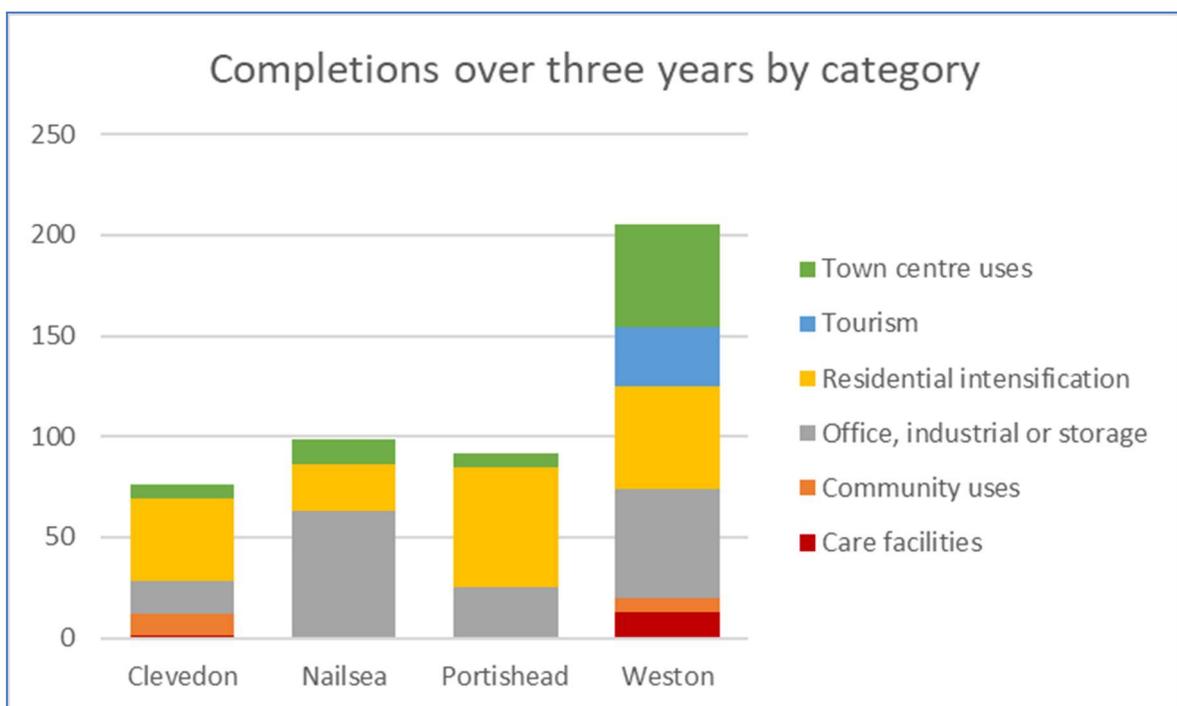
Over this three year period there has been a slight increase in the number of completions from windfalls in the towns. Although, as the table shows, the actual numbers are relatively modest. It is not certain whether this is a sustained upward trend. However, if this was projected over the Local Plan period the average per year would be 155 or 2325 over the Plan period.

Basing windfalls on the Core Strategy average and the average for the last three years would give a range of between **1725 -2325** units.

Sources of supply

The majority of the windfalls over the past three years are small scale (on sites of less than 10) with the exception of some Prior Approval office redevelopments in Nailsea and Portishead. Further analysis of the sources of supply is made below.

The following graph show where these windfalls have originated from during the period 2017/18 to 2019/20



Past trends

For the past three years between nearly 40% of windfalls have come from residential intensification. Portishead, Weston and Clevedon have seen similar amounts with a lesser number in Nailsea. They arise from various sources e.g. building in gardens, converting garages and subdividing existing houses or flats. Most are single units and almost all small scale (sites under 10 units).

The overwhelming number of the changes from employment land in the last three years have been from offices. Storage and industrial changes have been minimal and exclusively for small scale sites delivering less than 5 units. Changes to permitted development rights have resulted in a trend to obtain permission to convert offices to residential use. Prior Approval office redevelopments in Nailsea and Portishead have seen some of the biggest conversions to residential use to date. In the past 3 years there have been 158 homes created from office, industrial and storage uses almost 50% of these were on the two sites in Nailsea and Portishead. The conversion of care and nursing homes to residential use has been an ongoing trend. Weston has traditionally had a high proportion of care homes. The ageing nature of some of the stock, difficulties in meeting modern requirements and desire to meet care needs in peoples' own homes has resulted in some owners selling up or redeveloping for residential use. Numbers over the past three years have, however, been small and almost exclusively in Weston-super-Mare.

About 17% of windfalls in the towns have come from town centre uses in the past three years. These have been mostly shops, some financial uses and restaurants but some of the bigger sites have been the conversion of pubs. The trend in North Somerset, so far, has been in small scale conversions often just ones and twos but the demise of some of the larger stores could result in bigger sites coming forward if alternative town centre uses are not forthcoming. Maintaining a concentrated primary shopping area is a key town centre policy.

The change of use of tourist uses to residential over the past three years has occurred solely in Weston-super-Mare. This has seen the change from bed and breakfasts, guest houses, hotels and holiday flats to residential. Numbers have been modest with the biggest change happening through multiple small applications at Claremont Crescent.

Change from community uses are minimal. Change have come from halls, children's nurseries and a police station. The policy approach is that generally community uses should be protected and maintained in community uses.

Future trends

Residential intensification is likely to continue to provide a supply of windfall units from gardens, subdivisions and converting outbuildings.

From 31 August 2020, a new permitted development right was introduced which allows for the construction up to two additional storeys to dwelling houses consisting of at least two storeys, and one additional storey to one storey dwelling houses. Certain limitations apply, notably in conservation areas and to buildings constructed

before 1948 and after Oct 2018. These PD rights allow both extensions and new flats above existing dwellings.

These changes in PD rights are unlikely to create opportunities in the older areas of our towns due to either the conservation area status or ineligibility due to the age of properties. The properties eligible are mostly owner occupied. Whilst there is a concentration of privately rented property especially in Weston it tends to be in the older properties which fall outside the age requirements. Some upward extensions to provide additional living accommodation can be expected but the complexity of creating a separate property above a private house raises issues about how this would impact mortgages, the legal issues about freeholds, service charge agreements, shared access, parking and garden space. Some rented property owners may consider the option if returns from renting are viable, however it is unclear what the take up would be. There is no indication that Housing Associations intend to use this.

PD also applies to some categories of detached blocks of purpose-built flats. Adding additional storeys on purpose-built flats could generate some capacity however many of the larger purpose-built flats are on the seafront in Weston-super-Mare and in conservation areas so can be ruled out. Similarly, some of the socially rented blocks would need to be programmed into regeneration initiatives by the social landlords.

Currently the change to permitted development rights for residential properties has not resulted in any discernible trends. The situation will continue to be monitored.

Overall, it is likely that a numbers of units will continue to come from residential intensification. The impact of changed PD rights is unclear. Opportunities to intensify some estates owned by Housing Associations may provide more significant numbers.

Office industrial and storage

The ELSNA report calculates that there has been a 5% reduction (171,000 sqm) of office floorspace in North Somerset between 2009 and 2020. It concludes that 'COVID-19 has undoubtedly accelerated the pre-existing trends towards remote working, with a likely scenario that less desirable office stock will be abandoned as the market consolidates.' This long-term change in work patterns is yet to be fully realised and understood. However, it seems reasonable to assume an increase especially in the short-term with the smaller and less-desirable offices being converted. Some large-scale office conversions are also possible if the need for less office space is sustained. It is difficult to predict which sites might come forward much could depend on the type and success of the current business user, rents and ownership.

Predicting how many units from these sorts of changes is also difficult but it is likely to increase from the current 50 per year and if large-scale conversions took place it could result in several hundred units.

Care homes

Anecdotally it seems that the trend to convert care homes may be accelerated by the pandemic as a result of reduced demand resulting from relatives being reluctant to use care homes and increased costs. Numbers are likely to be relatively modest unless one or more of the larger establishments were to close. It is anticipated this trend to continue at least in the short term until supply becomes more limited.

Town centre uses

The changes in the retail environment are well documented and are likely to continue if not accelerate. Less retail space is likely to be needed in the future. Recent changes to permitted development rights and the difficulties in renting retail floor space means that properties especially in some of the more peripheral areas are increasingly likely to see change to residential uses. Branches of banks, building societies and estate agents are predicted to close nationally as online services increase. The importance of town centres and recent place-making initiatives designed to encourage mixed use schemes including new homes will drive the renewed vitality of town centres. These larger initiatives will encourage further investment and are likely to result in significant opportunities coming forward.

Retail change may not just be confined to town centres some of the retail parks could be impacted. Some change to residential may be likely in these locations although this is difficult to predict.

Tourism

Change from tourist accommodation is likely to continue as expectations in the quality of accommodation exceed some of the outdated availability and online platforms enable a new source of lets to become available. It is not clear whether, as a result of the pandemic, change will accelerate but the supply of possible hotels, B&B's and Guest Houses especially in Weston-super-Mare is considerable.

Community uses

The change to residential from community uses has been fairly small in recent years this is likely to continue as no change to the policy approach of safeguarding community uses in the new Local Plan is expected.

9. Conclusions

Table 3 Estimated urban capacity

Identified potential in the Plan Period	Weston-super-Mare	1492
	Portishead	374
	Nailsea	68
	Clevedon	150
Total Identified		2,084
Total windfalls in all four towns		1725-2325+

The supply of residential units in towns is made up of identified sites and windfalls. Table 3 sets out the capacity. Just over 2,000 units are anticipated to come forward

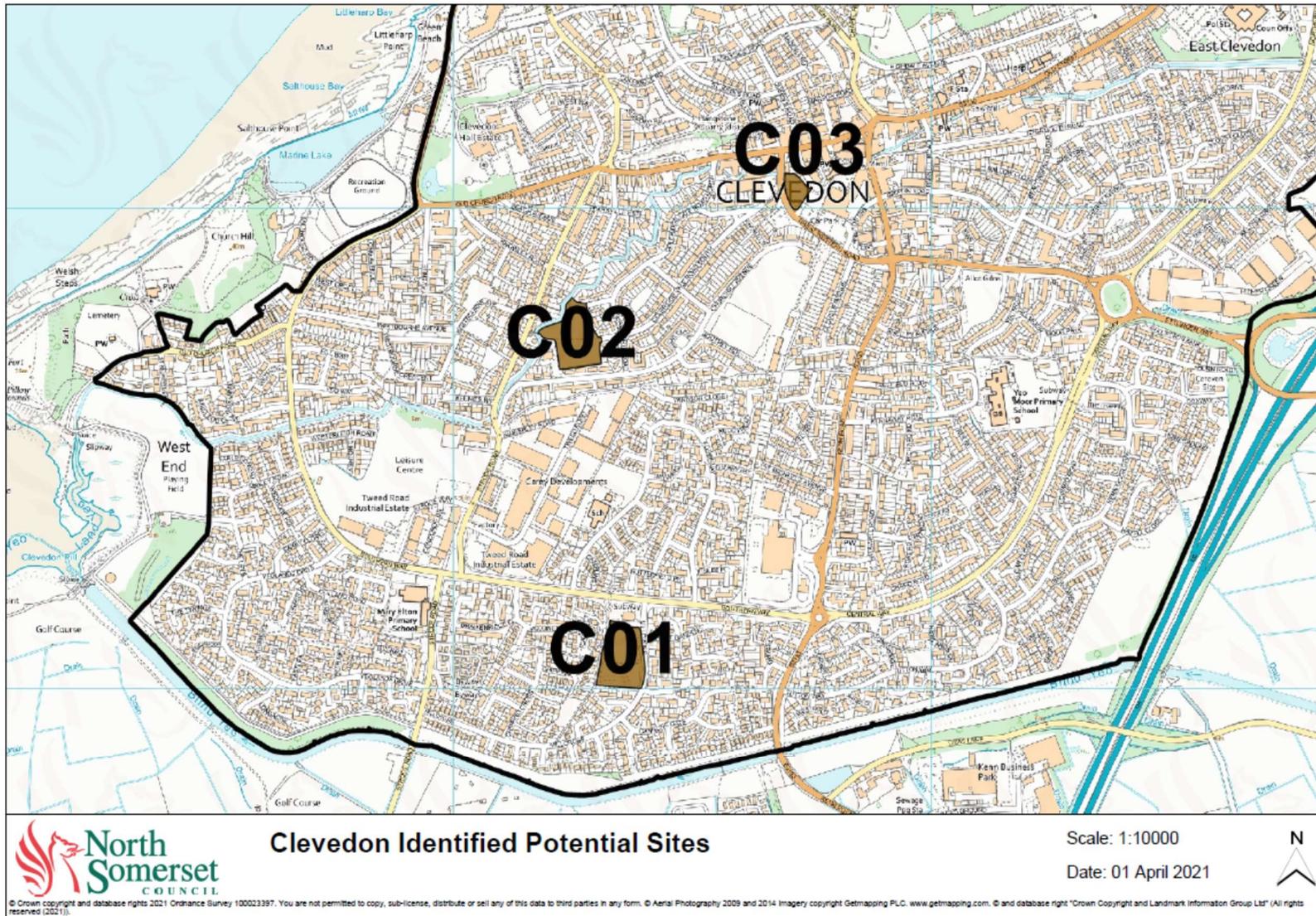
on identified sites within the Plan period. Estimating the supply of windfalls is difficult but if past trends are taken into account this is likely to be in the range of 1725-2325 units with further windfalls coming from the upward trend in change of use especially offices, town centre uses, tourist accommodation and care homes.

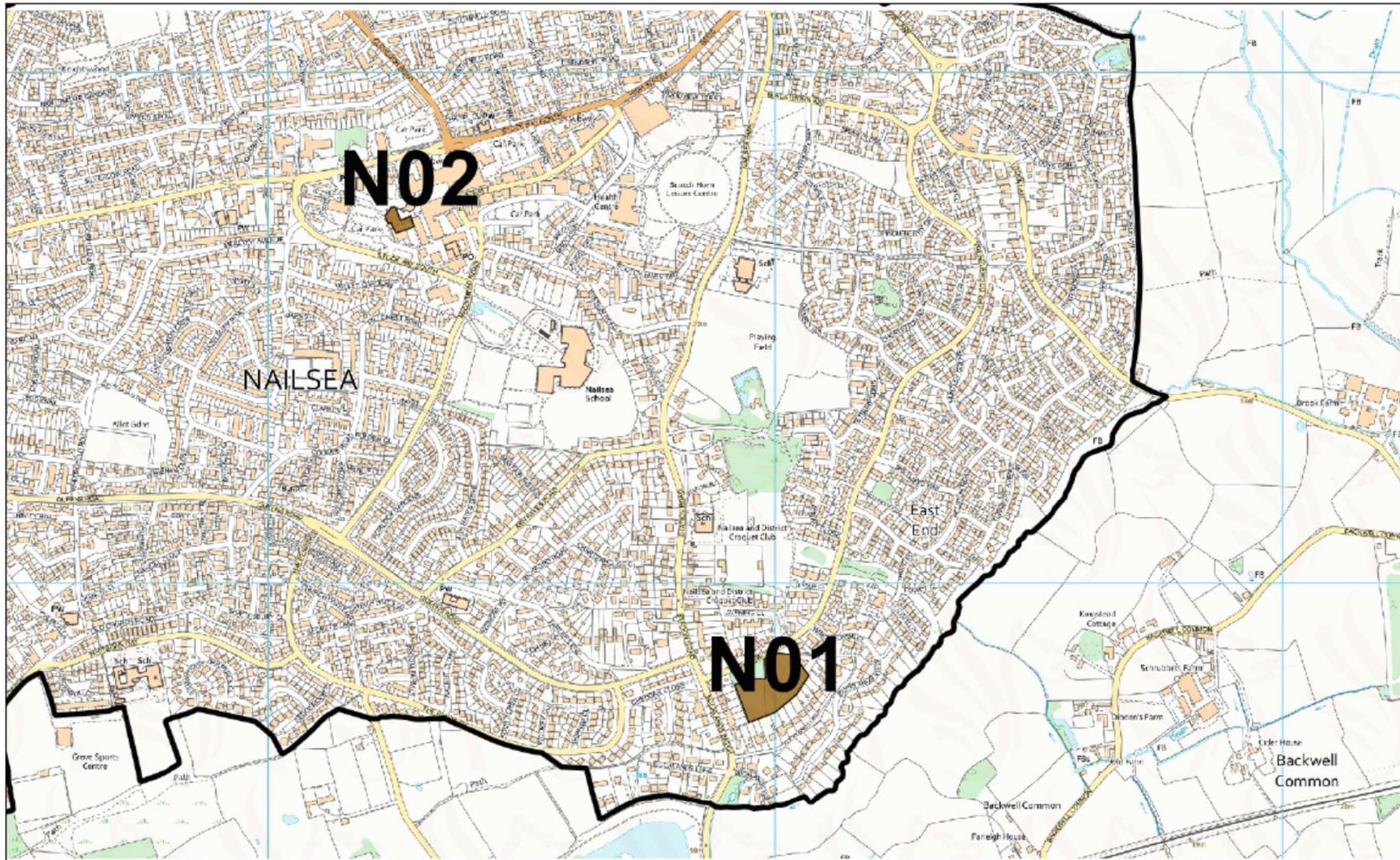
Appendices

Appendix 1 Maps showing the location of the identified potential sites

Appendix 2 List of sites considered unlikely to be delivered in the Plan Period

Appendix 1: Maps showing the location of the identified potential sites





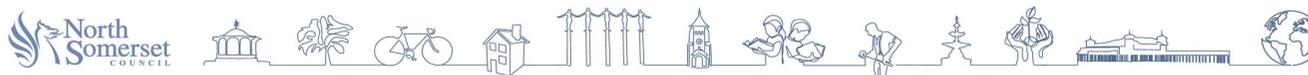
Nailsea Identified Potential Sites

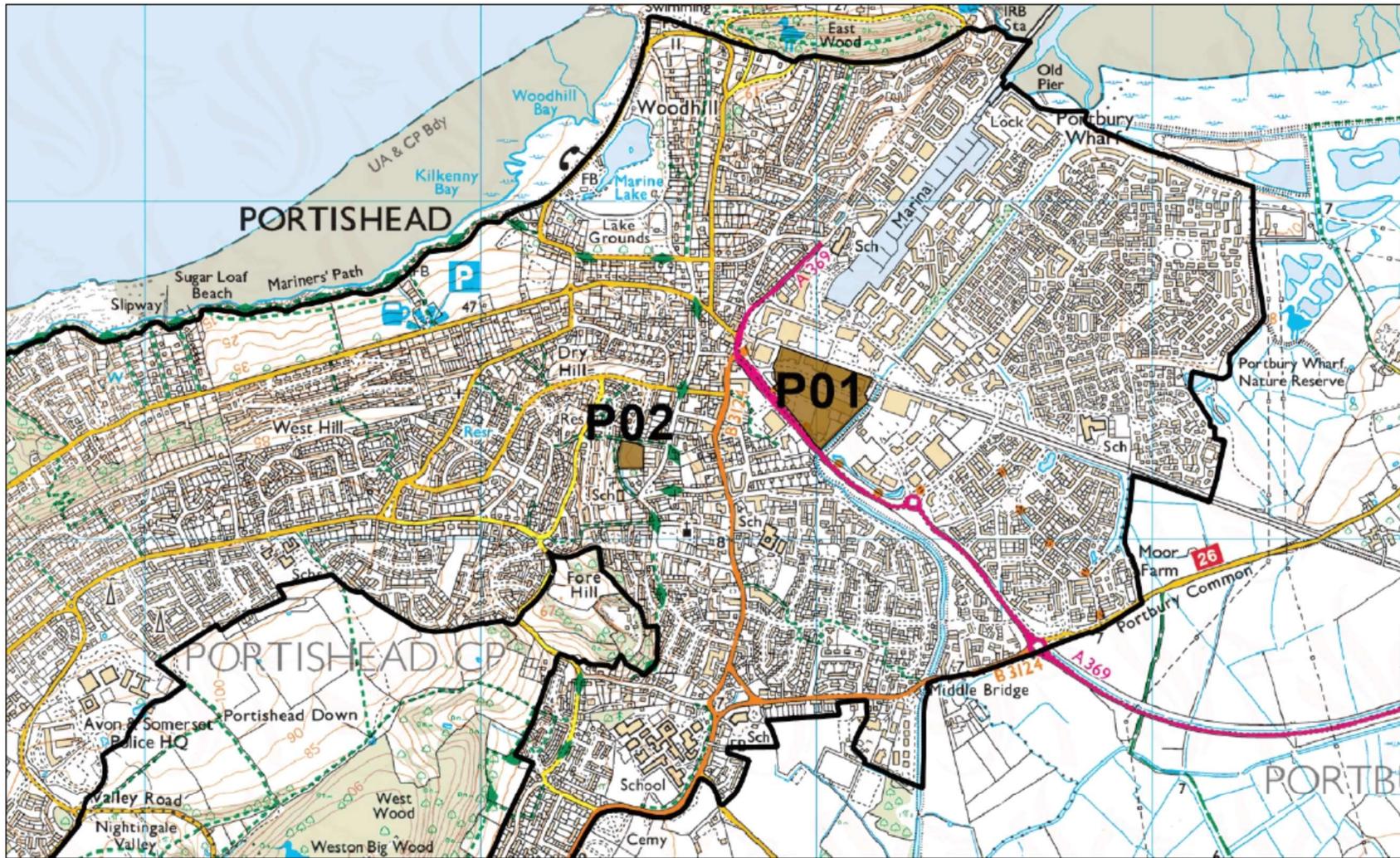
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Portishead Identified Potential Sites

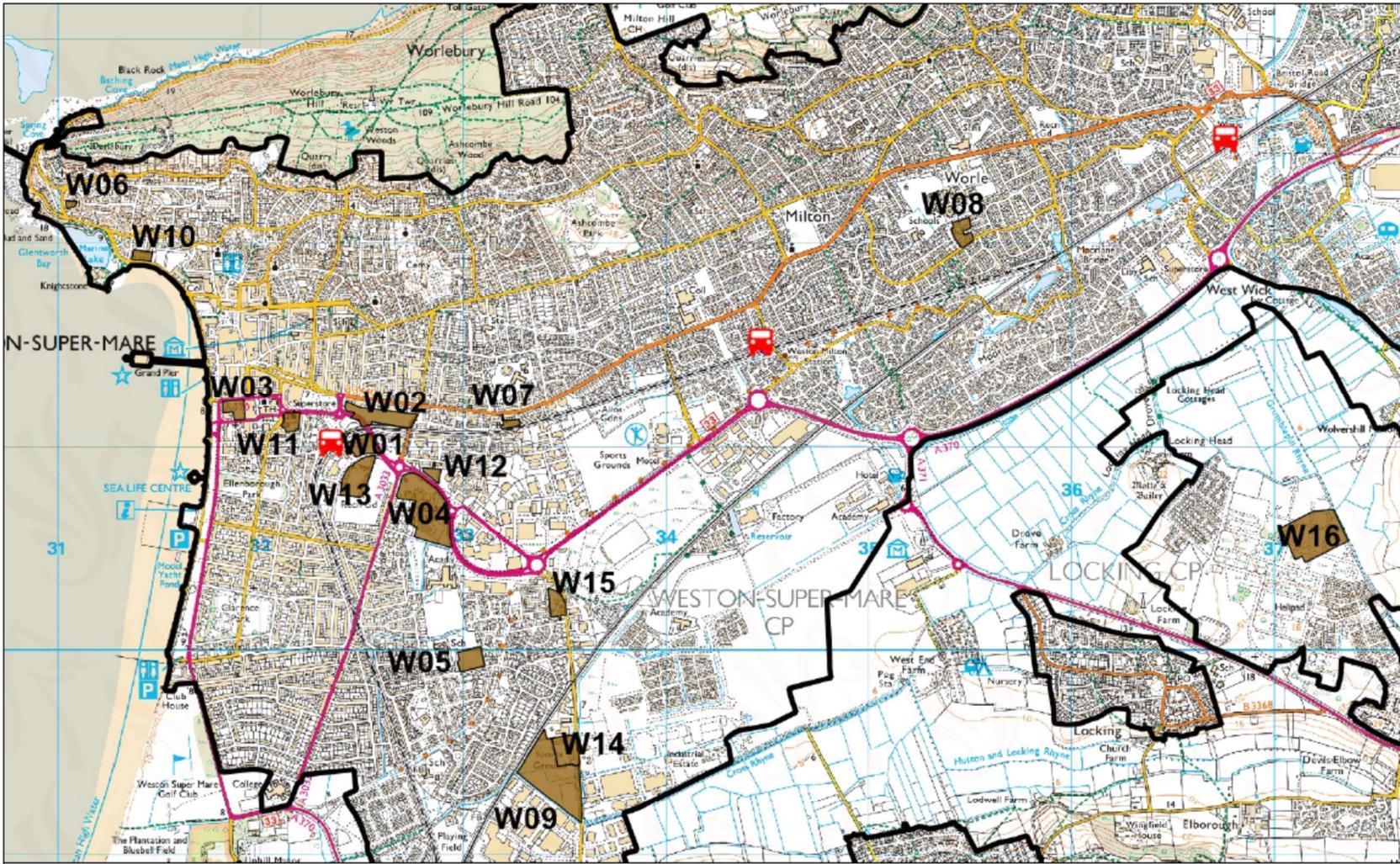
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Weston-super-Mare Identified Potential Sites

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Appendix 2 List of sites considered unlikely to be delivered in the Plan Period

<i>Location</i>	<i>Source</i>	<i>Comment</i>
Clevedon		
Castlewood	Actively identified	Future of site under consideration. May come forward for development in longer term if considered surplus to employment requirements.
Clevedon Hospital	SHLAA	Site previously promoted when alternative hospital location was being sought, however remains in operational use as a hospital.
Moor Lane	SHLAA	In employment use in conjunction with adjoining depot and car parking.
The Triangle	Actively identified	Upper floor development could be appropriate, subject to master planning.
Yeolands Farm	SHLAA	Identified as suitable in Site Allocations Plan, however remains in use as a caravan site with no intent to deliver.
Nailsea		
25-27 Clevedon Road	SHLAA	Currently in operational use for employment and coach depot.
Land at Southfield Road Trading Estate	SHLAA	Currently in operational employment use.

Location	Source	Comment
Land at Station Road, Nailsea	SHLAA	Open space. If deemed suitable for development in future, likely to only yield small scale development.
Coates Estate	SHLAA	Part of site has already converted to residential under PD rights. Remaining land in employment use.
Portishead		
Town centre sites	Actively identified	Additional residential potential may come forward as a result of current place-making initiative.
Land at Serbert Way	Actively identified	Employment allocation.
Land adjacent to 16 Roath Road	SHLAA	Likely to be relatively small scale development if considered suitable.
Weston-super-Mare		
Land south of Herluin Way (Avoncrest site)	SHLAA	Whilst suitable in principle remediation costs may be prohibitive.
Parklands Villages - additional land parcels	SHLAA	Revised master planning may identify suitable additional land parcels.
Tallford House, 38-40 Walliscote Road	Recent pre-application	Potentially suitable for conversion to residential use.
Victoria Square	Actively identified	Land assembly issues, multiple ownerships and numerous existing uses.
St James Street	Actively identified	Land assembly issues, multiple ownerships and numerous existing uses.
Land south of Regent Street/Lower High Street East	Actively identified	Land assembly issues, multiple ownerships and numerous existing uses.



Location	Source	Comment
Sunnyside Road North	Actively identified	Land assembly issues, multiple ownerships and numerous existing uses.
Land around Drove Road roundabout, south of Railway Line	Actively identified	Suitable in principle however alternative sites would need to be found for alternative uses.
Queensway District Centre	Actively identified	If area was reconfigured a more efficient use of land could lead to long term potential.
Locking Castle District Centre	Actively identified	If area was reconfigured a more efficient use of land could lead to long term potential.
Home Bargains Winterstoke Road	SHLAA	Could be part of wider scale redevelopment opportunities however site currently occupied by retail unit.
Meadow St Triangle	Actively identified	Land assembly issues, multiple ownerships and numerous existing uses.
Upper floors Regent House	Actively identified	Likely to be relatively small scale development on upper floors if existing use were to relocate.
Fire station, Milton	Actively identified	If fire station were to relocate the site may be suitable for residential.
Ambulance Station Drove Road	Actively identified	If ambulance station were to relocate the site may be suitable for residential.
Land adjacent to Pier Square-Grand Central Hotel	Actively identified	No known intent from landowner to redevelop.
Vision Night Club	Actively identified	No indication that current use will not continue into the foreseeable future or that alternative town centre uses would not be more appropriate.



Location	Source	Comment
Odeon Cinema	Actively identified	No indication present use will not continue or that an alternative town centre use would not be found.
Corner of Regent St & Walliscote Rd (opposite Odeon Cinema)	Actively identified	Land assembly issues, multiple ownerships and numerous existing uses.
Melrose and Maderia car parks	Actively identified	If car parks became surplus to requirement residential may be suitable.
Gallagher retail park	Actively identified	Recent refurbishment has taken place and no indication site is available although longer term changes in out-of-town retailing could impact the site with rationalisation in the sector causing vacancy rates to increase. Some indication this may be happening as recent applications for change of use to food and drink and gym uses.
Pottery Close	Actively identified	No indication that site is available. Masterplanning of area would be required.
Scrap Yard, Winterstoke Road	Actively identified	No indication that site is available. Relocation of scrap works and remediation of site likely to be difficult. Masterplanning of area would be required.
Longton Industrial Estate (Woodview Terrace)	SHLAA	Loss of employment uses could be an issue. No indication that site is available or not required for current use. Masterplanning of area would be required to properly assess potential. Part of site promoted to SHLAA likely to only yield small number of units if considered suitable in isolation.

Location	Source	Comment
Warne Road	Actively identified	Loss of employment uses could be an issue. No indication that site is available or not required for current use. Masterplanning of area would be required.
East of Winterstoke Road	Actively identified	Area has seen some recent commercial investment, although some interest expressed in the past about small scale redevelopment on parts of the wider area.
Worle Train Station Car Park (and adjoining safeguarded land)	Actively identified	Operational train station use and land reserved if extension needed.
Land to the north of Weston Milton Station	Actively identified	Change may be considered as part of the road proposals together with a redevelopment of the station. Would require significant intervention. Viability and land assembly significant issues, unlikely in foreseeable future.
Coker Road Industrial Estate	Actively identified	Currently in employment use.
Davan Caravans, Goosey Lane	Actively identified	Caravan sales use.
Riverbank Medical Centre, Walford Avenue	Actively identified	Medical centre merged with other local surgery, however now temporarily in use as a Covid-19 vaccination centre.
Europark	SHLAA	Loss of employment uses could be an issue. No indication that site is available or not required for current use. Masterplanning of area would be required to properly assess potential.
Bournville -Southern Chord, land off Coleridge Road	SHLAA	Would only become available if southern chord safeguarding no longer needed.
End of Aisecombe Way	SHLAA	Unsuitable for residential.

Location	Source	Comment
Bridge Farm	SHLAA	Area at risk of flooding.
BT Building, Boulevard	SHLAA	In operational use as telephone exchange. No intent to relocate existing use and redevelop.
Anchor Head Hotel	SHLAA	If considered suitable only likely to deliver as a small scale redevelopment.
Orchard House	SHLAA	No known intent from landowner to redevelop, despite previous allocation status.
Midhaven Rise	SHLAA	Currently in use for sports pitch which would need to be relocated.

