



BASSETLAW

DISTRICT COUNCIL

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Dear Carmel

Thank you for your letter of 17 February. With regard to the specific points that have been raised, the Council's responses are set out below.

Matters requiring clarification

1. *The policies for Worksop, Retford and Harworth-Bircotes concentrate most of the District's growth in these settlements and refer to sustainable urban extensions. However sustainable urban extensions are not defined. Broad locations for growth are not identified nor are any strategic sites. It is unclear as to whether the focus will be on previously developed land or greenfield release. There does not appear to be a set of criteria that would guide the site selection process for development in and around these settlements. Without clearer direction it could be argued that critical decisions are being delegated to the Site Specific Allocations DPD.*

Planning Policy Statement (PPS) 12 states that the Core Strategy should make 'clear spatial choices about where developments should go in broad terms' (paragraph 4.5). It does not define what is meant by 'broad terms'. It is the Council's view, however, that, in the absence of the need for strategic allocations in the Core Strategy, identifying specific directions for growth in relation to these three settlements goes far beyond consideration of 'where developments should go in broad terms'. While Representation may have been made about the need for such direction (with the underlying aim of ensuring that specific sites become, by default, the only ones available for allocation) such consideration is far more appropriate for the Site Allocations stage. At this point, the full range of sites available for potential allocation can be considered in detail, both by the Council and by the general public, and their relative merits assessed.

While it may be appropriate for large urban authorities or Growth Point areas, which will see significant amounts of new development, to identify specific directions for future expansion, the growth of Bassetlaw's three small towns is, relatively speaking, limited. In Retford's case, for example, we are only looking at around 470 dwellings over a fifteen year period. Furthermore, around Worksop and Harworth Bircotes in particular, there are no significant constraints (e.g. flood risk areas; sensitive environmental sites; or physical barriers) that serve to narrow down an area of search for urban expansion. This means that, regardless of the site specific Representations before the Inspector, there are numerous suitable sites, in and around the



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towns, that could accommodate the levels of development required. The Council does not feel that it is appropriate within a Core Strategy to limit options about the direction of such development or to address that level of specificity.

The reference to sustainable urban extensions (SUE) was included following Representations made at Preferred Options stage, which suggested that the Council should provide greater clarity about the fact that development will be needed on greenfield land, notably in Worksop and Retford, if the District is to achieve its housing targets. SUEs are, in the case of these two towns (which have no brownfield sites outside the immediate town boundary) by definition, greenfield sites. We will, however, be happy to reconsider the use of the term SUE if it is felt to have given undue emphasis to the potential scale of greenfield development proposed. Overall, however, the Council feels that this level of guidance, combined in Harworth Bircotes' case by a focus on brownfield development, is sufficient for a strategic document.

With reference to the matter of a set of criteria for guiding allocations, it is the Council's view that such a policy is unnecessary at this level. Decisions in relation to the allocation of new sites will need to factor in a considerable range of issues including the Sustainability Appraisal objectives; Core Strategy objectives; policies in the Core Strategy & Development Management Policies DPD; and site specific factors. We are currently developing a comprehensive methodology that will be used to judge all 'deliverable' sites. This will be made available as part of the consultation process in relation to the Site Allocations DPD.

The Council has, through its comprehensive consultation process, produced a Core Strategy that makes clear spatial choices about the settlements within the District to which new development should be directed. This broad spatial framework, as required by PPS12, provides a firm basis for consultation on site specifics through the Site Allocations process, which is already underway. It is the Council's view that this in no way delegates critical decisions to another DPD and, quite conversely, that to make a judgement about the specific directions for growth in the Core Strategy is premature. It would also be unnecessary in relation to the demands of national planning policy and will serve to add considerable delay to the Core Strategy process as developers rush to promote sites and further lengthy consultations are undertaken. The Council's approach in this respect, and in respect of its lack of inclusion of an 'allocations criteria' policy, is consistent with that taken in numerous adopted core strategies and we will be happy to direct the Inspector to examples of these as necessary.

2. The housing and employment requirements as set out in the settlement policies are expressed in percentages rather than actual figures. Furthermore it is not apparent how the percentages have been derived. Can this approach be justified and is it in line with national policy?

The Council's decision to set out percentages in policy, rather than specific numbers, for housing and employment growth, was carefully considered. First, it was felt that any numbers used within policy will be out of date as soon as they are written down, as a result of new permissions. Second, it was felt that, given the likely changes to projections of need over the fifteen-year plan period, the use of percentages will be the most flexible approach available and will ensure that the Council is always delivering the required amount of housing and employment land no matter what the headline target figure.

Headline targets, for monitoring purposes, have been set out in the Monitoring and Implementation section of the DPD and the Council feels that this is an appropriate way to ensure that the District's fluctuating housing and employment land needs remain deliverable over a 15 year period. Should the Inspector feel, however, that there is a need for specific figures in each policy, the Council will be happy to make some suggestions accordingly.

The percentages have been derived from consideration of the levels of 'deliverable' housing and employment land available in each settlement (please see the Strategic Housing Land Availability Assessment (SHLAA) and Employment Land Capacity Study); consideration of the future role of each settlement and the levels of growth required to achieve and sustain that role (please see, for example, Future Development Scoping Study for Harworth Bircotes); and consideration of consultation responses made throughout the process in relation to the levels of previous growth in each settlement and appropriate levels for the future. The Council believes this approach to be in line with national policy.

Notwithstanding the above, the Council wishes to emphasise that decisions about the distribution of new development across a local authority area, while informed by a range of factors (as set out above), cannot be seen as an exact science; there is no formula that will produce an exact set of figures. They will always be a matter of professional and local judgement, based on an understanding of the nature of a given range of settlements and the local ambitions for those settlements. The Council believes that its judgement about the appropriate levels of new development across the District is clearly articulated through the evolution of the Core Strategy as it has progressed from Issues & Options to Submission.

3. There is limited reference in the DPD as to when and where new development will occur over the 15 year plan period. There is no housing trajectory covering the plan period in the DPD or consideration of housing provision in the first 5 years of the plan and beyond. The housing figures imply that in the short-term most new housing development will take place in Retford with far less in Worksop. Is this the case? Certain representations question the housing figures. Is there any intention to resolve this and agree a common set of figures?

The Council believes that the settlement specific policies within the Core Strategy show quite clearly where new development will occur over the plan period. In terms of when new development will occur, without allocated housing sites it is not possible to give anything other than a broad indication of this. Clearly, the expectation is that the quantum of new housing development will be delivered within the plan period. The SHLAA assessments give the Council no cause to doubt that this will be achieved.

The Council is not aware of any national policy requirement to include a housing trajectory within the Core Strategy, either for the lifetime of the DPD or for the first five years. Such information is set out, as required, in the SHLAA and Annual Monitoring Report. This means that it can be regularly updated to reflect changing annual circumstances. If, however, the Inspector feels that an indicative trajectory would provide greater clarity about when housing development may occur, in broad terms, over the plan period, the Council will be happy to provide one (derived from the SHLAA) for inclusion as an Appendix to the Core Strategy.

The Inspector is correct that in the short term there is indeed greater potential for new housing development in Retford than in Worksop. This does not reflect a planning strategy per se, but is merely an indication of the fact that there are a greater number of outstanding permissions within Retford than there are in Worksop. Further scrutiny of the figures will show that this weighting will shift significantly in favour of Worksop when considered over the entire plan period.

The Council is only aware of two Representations (DLP and I-Plan) that seek to question the overall quantum of housing. Both are pursuing different aims, take different approaches and reach different conclusions. The majority of Representations are supportive of the Council's use of the Regional Spatial Strategy (RSS) figures, while some are concerned only with the distribution of housing. Notwithstanding this, the Council does not intend to agree a common set of figures in advance of Examination. The RSS remains part of the Development Plan and, as such, it is these housing figures that national planning policy requires the Council to use, regardless of the Government's stated intention to remove RSSs from the Development Plan. The Council, as it states in paragraph 4.6 of the Publication Core Strategy, believes the RSS figures to be the only ones that have been subject to, and agreed following, a very lengthy Examination in Public and, as such, to be a sound basis for use within the Core Strategy. Most pertinently, the Council does not believe that regional or local circumstances have changed such that either the RSS figures or, just as significantly, the strategy driving those figures, can now be regarded as unsound. Consequently, it is the Council's view that the issue at hand is the matter of the soundness (which has already been agreed) of the basis for the adopted RSS figures that are being used by the Council, rather than Examination of entirely new proposals. Such an approach would serve only to re-open a lengthy and technical debate, which has already been had in front of the Inspector for the RSS, about the quantum of housing to be delivered in Bassetlaw.

4. There is little mention of what physical, social and green infrastructure is required in association with the development proposed or who will be responsible for its provision. Again national guidance stresses the importance of infrastructure delivery.

PPS12 states that core strategies '*should be supported by evidence of what physical, social and green infrastructure is needed...*'. The Council has provided, in its Infrastructure Study, Water Cycle Study, Transport Study, Green Infrastructure Study, Open Space Study and Playing Pitch Assessment, a broad indication of the scale and nature of the infrastructure that may be needed to deliver the amount of development proposed. Given that this work, produced in close collaboration with all key infrastructure providers, did not identify any infrastructure deficits or infrastructure obstacles that would impede the delivery of the quantum of development proposed, the Council did not feel there was anything to set out in terms of a detailed schedule of potential works, or references in policy, in the Core Strategy itself. The Council is not aware of any Representations, from infrastructure providers or other interested parties, that queried the Council's conclusions in this regard. Clearly, the Site Allocations document will set out in more detail what is required of individual sites, guided by the evidence base documents referred to above. This would be supported by any Community Infrastructure Levy charging schedule.

5. The relationship with the Proposals Map is unclear and not explained. As a result there is uncertainty as to what parts, if any, of the Proposals Map are relevant. For instance are the Development Boundaries being reviewed and/or changed? Policy DM3 refers to Development

Boundaries. Are the boundaries and status of protected areas to be determined as part of this DPD?

The Core Strategy's relationship with the Proposals Map is referenced on page 8 of the Publication Core Strategy, in the box titled '*How do I use the Core Strategy?*'. The Preferred Options document made references to the Proposals Map wherever a policy referred to something that was represented on it, but these references were removed at Publication stage as it was felt that they were superfluous. If the Inspector feels that greater clarity could be achieved by their reinstatement, the Council will be happy to oblige.

The Development Boundaries were consulted upon part of the Core Strategy process. Appendix 5 of the Preferred Options document sets out the methodology used and the initial maps that were generated for comment. The Council felt that it was important that initial development boundaries were set at this stage so that there was complete clarity about where development could and could not take place during the period between the adoption of the Core Strategy and the adoption of the Site Allocations DPD. The Site Allocations DPD will, clearly, see development boundaries revised as (what are currently) edge of settlement sites are allocated.

In terms of the relevance of the Map, the Council has never had an adopted Local Plan. It has, therefore, never had an adopted Proposals Map. Consequently, all of the Map is relevant as everything on it reflects new policy contained within the Core Strategy (e.g. development boundaries; retail boundaries; flood risk zones; etc) rather than carry overs from a Local Plan. Thus, the boundaries and status of protected areas are indeed to be determined as part of this DPD but will be updated and re-examined, as required by Regulation, as subsequent DPDs that may have an impact upon these boundaries are submitted for Examination.

Programme

Thank you for conveying the Inspector's initial thoughts on an estimated timetable. The Council can appreciate the value of a Pre-Hearing Meeting but had not anticipated that two weeks would be necessary for the Hearings, given the limited number of issues that have been raised by Representors.

Referencing of Representations

Thank you for your assistance in this area. I understand that there are likely to be some changes to the referencing and look forward to resolving this in the near future.

Changes

The Council is not meeting with any Representors, although it had discussions with several in advance of the submission of the Schedule of Proposed Minor Changes.

Additional work/Inspector's questions

The Council has not produced any written responses to Representations received. It will,

however, be happy to assist the Inspector by producing topic papers or responses to particular Representations as required.

Examination web page

Thank you for your assistance in producing the web pages. I understand that these are now fully operational.

Representation

The Council will be represented by Council Officers, as required, and does not anticipate the need for legal representation.

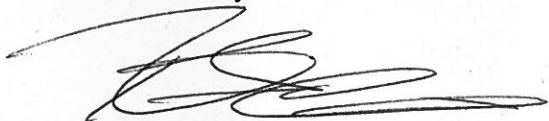
The Council will certainly call upon expert witnesses if it feels this to be necessary. We can, however, only make a judgement on this once we have receipt of the Inspector's questions or, at least, an indication of the particular issues that he wishes to explore. Unfortunately, it has already become apparent that one such witness, who was intimately involved with the production of the RSS housing figures, will be unavailable for the last two weeks of May (when Examination may take place). Consequently, should the Inspector have any further questions on this issue that he feels could be addressed by the Council in advance of Examination, early sight of such will be very much appreciated.

Advisory Visit

I can confirm that the Council did not have an LDF Front Loading visit from PINS.

I hope that this is of assistance, but will be happy to provide further information, or respond to any additional questions, as required.

Yours sincerely



Richard Schofield
Planning Policy & Conservation Manager