

# Core Strategy and Development Management Policies Publication Stage Representation Form

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Please return to Bassetlaw District Council by 5pm on Monday 20th December 2010

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This form has two parts:

**Part A** – Personal Details

**Part B** – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

**Guidance on how to complete this form is provided on the final pages**

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## PART A

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### 1. Your details

### 2. Agents Details (if applicable)

Title	<input type="text"/>	<input type="text"/>
First Name	<input type="text"/>	<input type="text"/>
Last Name	<input type="text"/>	<input type="text"/>
Job Title	<input type="text"/>	<input type="text"/>
Address line 1	<input type="text"/>	<input type="text"/>
Line 2	<input type="text"/>	<input type="text"/>
Line 3	<input type="text"/>	<input type="text"/>
Line 4	<input type="text"/>	<input type="text"/>
Postcode	<input type="text"/>	<input type="text"/>
Telephone Number	<input type="text"/>	<input type="text"/>
E-mail Address	<input type="text"/>	<input type="text"/>

If you would like your details to be added to our consultation database, please tick

**PLEASE NOTE THAT THESE REPRESENTATIONS, INCLUDING YOUR CONTACT  
DETAILS, WILL BE PUBLIC DOCUMENTS.**

**PART B - Please use a separate sheet for each representation**

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Name or Organisation:

**3. To which document does your representation relate?**

Core Strategy

**4. To which part of the Core Strategy/Sustainability Appraisal does your representation relate?**

Paragraph Number(s)		Policy Number(s)	Policy CS3	Diagram(s)	

**5. Do you consider the document to be legally compliant\*?**

Yes

**6. Do you consider the Core Strategy to be 'sound'\*?**

No

**7. If you consider the Core Strategy to be 'unsound', please identify the test of soundness to which your representation relates.**

Justified	Effective	
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\* The considerations in relation to the Core Strategy being 'sound' and 'legally compliant' are explained on the back page of this form.

**8. Please give details of why you consider that the Core Strategy/Sustainability Appraisal/Proposals Map is not legally compliant or is unsound. Please be as precise as possible.**

**If you wish to support the legal compliance or soundness of the Core Strategy/Sustainability Appraisal/Proposals Map, please use this box to comment.**

**Our concern relates to the soundness of Policy CS3: Retford.**

**Under Section C “Retford Town Centre and Regeneration Opportunities” the policy states “Support will be given to town centre developments that enhance Retford’s vitality and viability in it’s role as a core service centre and attraction as a visitor destination in it’s own right. These will include..... a marina on the Chesterfield Canal (with appropriate ancillary facilities, as necessary)”.**

**British Waterways (BW) has concerns over the soundness of the proposal to support a marina on the Chesterfield Canal in terms of the justification provided within the evidence base and it’s effectiveness in terms of deliverability. We would wish to emphasise that we are pleased to see positive proposals for waterway-related development such as this within the Core Strategy, and we would not wish to see this reference deleted altogether if it were found to be unsound, rather we consider that there is scope to make a small amendment to the wording of the policy to ensure it’s soundness.**

**British Waterways established a New Marinas Unit in 2005 to facilitate successful marina developments. There is now in place an application process which is designed to help BW manage potentially competing demands on water resources and other facilities from multiple developers in a fair way. The expansion in mooring capacity is generally constrained by factors that impact upon water resources and supply, navigational safety and the environment. Although in principle, BW would lend its support to the development of new off-line mooring provision on the Chesterfield Canal, together with associated essential infrastructure, we would not wish to restrict marina development only to the vicinity of Retford, or those locations considered to be the most suitable within the Bassetlaw Marina Study- Final Report (April 2010) which forms part of the evidence base for the Core Strategy. In addition BW would need to check, through the New Marinas process, that any site is acceptable in terms of water resource, navigational safety and its impact upon the environment.**

**The Council’s Marina Study includes a market assessment that compares the number of boats per mile on the Chesterfield Canal to that of a perceived average number of boats per mile on the whole network and his analysis directly relates the low level of boat numbers to a lack of moorings. It is worth noting that there are currently approximately 34,000 licensed craft on the 2,200 miles of waterways managed by BW. The figure referred to in the report is 10 boats per mile. The report also states that 1 in 10 of boats is used as a hire boat. This figure appears to be exaggerated. Furthermore, the report contains data relating to forecast demand for new off line moorings generated in 2005. We consider that this data should be reviewed in light of current information available.**

**BW considers that this study requires updating, and the input of BW, as owners of the Chesterfield Canal, is considered to be essential to ensure that an up-to-date Marina Study can provide a robust and credible evidence base for any Core Strategy policy to support or encourage new marina development in the Retford area.**

**As noted above, BW is the owner of the Chesterfield Canal here, and any new marina**

proposal will require a network connection agreement from BW in order to access the canal. BW's support for such a proposal is therefore essential to its delivery. As also noted above, whilst BW is supportive of the principle of increasing off-line mooring provision in the form of new marina developments, without further investigation, the feasibility, and therefore deliverability, of a marina near to Retford, whether or not at any of the locations identified in the Council's Marina Study, cannot be confirmed.

9. Have you raised this issue during previous formal consultations? (tick as appropriate)

Yes (at Issues & Options)  Yes (at Preferred Options)

No  If you have answered 'No', please explain why this issue has not been raised before:

10. With reference to your answer at 8 above, please outline the precise change that you consider to be necessary to make the Core Strategy/Sustainability Appraisal/Proposals Map legally compliant or sound. Please demonstrate *why* this change will make the Core Strategy/Sustainability Appraisal legally compliant or sound.

**British Waterways considers that to make the Core Strategy sound, Policy CS3 should be amended to read as follows:**

*"Support will be given to town centre developments that enhance Retford's vitality and viability in its role as a core service centre and attraction as a visitor destination in its own right. These **may** include..... a marina on the Chesterfield Canal (with appropriate ancillary facilities, as necessary)".*

**Please note, we are suggesting only the alteration of one word, as highlighted above in bold. We consider that this very minor amendment to the wording of the policy allows a marina, with all the attendant economic benefits that such a development could offer in terms of employment, leisure and tourism, to be explicitly identified as a potential option, without the need for a more detailed investigation of its deliverability at this stage, or the need to address the uncertainties which we feel remain over the robustness of the evidence base in the form of the Council's Marina Study.**

**By indicating only that a marina might be an option, amongst others, which has the potential to contribute positively to the vitality and viability of Retford in its role as a core service centre and visitor destination, we consider that the Core Strategy has an evidence base which is sufficient to demonstrate such a level of broad potential to warrant further consideration of this option at a later stage, for example, in a Site Allocations document.**

**11. If your representation is seeking a change to the Core Strategy or Sustainability Appraisal, do you consider it necessary for you to participate at the oral part of the examination or will this written response (to be submitted to the Inspector) be sufficient?**

***Please note that this written representation carries the same weight, and will be subject to the same scrutiny, as oral representations.***

No, I do not wish to participate

Yes, I wish to participate

**Signature: Date 20/12/2010**

**PLEASE RETURN THIS FORM BY 5PM ON MONDAY 20TH DECEMBER 2010 TO:**

Planning Services, Bassetlaw District Council, Queens Buildings, Potter Street, Worksop,  
S80 2AH or by email to [future.plans@bassetlaw.gov.uk](mailto:future.plans@bassetlaw.gov.uk) .

## RESPONSE FORM GUIDANCE NOTES

### Introduction

Bassetlaw District Council has published the Publication Core Strategy for representations from Monday 8 November 2010 to Friday 20th December 2010. Following the end of this period, all representations will be submitted to the Secretary of State, together with the final Core Strategy. A Planning Inspector appointed by the Secretary of State will then lead a public examination on the Core Strategy, and issue a binding report, before it is formally adopted by the District Council.

According to the Planning and Compulsory Purchase Act 2004 the purpose of the examination is to consider whether the Core Strategy is **legally compliant** and is **sound**. If you are seeking to make representations on the way in which Bassetlaw has prepared the Core Strategy, then your comments or objections will relate to a matter of **legal compliance**. If your representation is regarding the content of the Core Strategy, then it is likely that it will relate to whether the Core Strategy is **sound**.

### Making Representations

If you wish to make a representation seeking a change to the Core Strategy or part of the Core Strategy you should make clear in what way the Core Strategy or part of the Core Strategy is not sound having regards to the tests of soundness (which are set out below). You should try to support your representation by evidence showing why the Core Strategy should be changed. It will be helpful if you also say precisely how you think the Core Strategy should be changed. Representations should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested change, as there will not normally be a subsequent opportunity to make further submissions based on the original representation made at this stage. After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Where there are groups who share a common view on how they wish to see a Core Strategy changed, it would be very helpful for that group to send a single representation which represents the view, rather than for a large number of individuals to send in separate representations that repeat the same points. In such cases, the group should indicate how many people it is representing and how the representation has been authorised.

### Legal Compliance

You should consider the following before making a representation on legal compliance:

- The process of community involvement should be in accordance with the Council's Statement of Community Involvement 2009;
- For each stage of consultation and according to the regulations, the Council must make available the various documents that have helped produce and inform the various stages of the Core Strategy through the media, website, libraries and distributions of hard copies on request;
- Bassetlaw District Council is required to produce a Sustainability Appraisal Report when the Core Strategy is published;
- The Core Strategy should have regard to national planning policies, but its policies must not repeat guidance set out in national policy; and
- The Core Strategy must have regard to the Sustainable Communities Strategy for Bassetlaw.

## Test of Soundness

The tests of soundness are that the Core Strategy should be:

- i) Justified - to be justified, the Core Strategy needs to be:
  - Founded on a robust and credible evidence base, involving evidence of participation by the community and stakeholders;
  - Choices made in the document must be backed by facts;
  - It must be the most appropriate strategy when considered against reasonable alternatives.
- ii) Effective - to be effective, the Core Strategy should be;
  - Deliverable;
  - Have a sound infrastructure delivery plan;
  - Have delivery partners who are signed up to it;
  - Coherent with the strategies of neighbouring authorities.
- iii) Consistent with National Planning Policy – to be consistent with National Planning Policy, the Core Strategy should be;
  - Justify its approach;
  - Justify a local need;
  - Has not repeated National Policy.