

8 December 2010

Dear Sir,

Bassetlaw Core Strategy

Please would you consider the following comments from the Retford Civic Society on the draft Core Strategy which has been published recently for consultation. The Society will be happy to discuss the various points with you if this would help.

Our most serious concerns are that the Strategy does not promote growth in the centre of Retford sufficient to stop it falling behind Worksop and Gainsborough as a place in which to shop and work, and that designation of the King Edward School site as protected open space would prevent enabling development which is likely to be essential if this important listed building is to be brought back into use.

Detailed Comments

The vision – page 26 and Policy CS3

23/1 { The strategy gives insufficient recognition to the need for growth in the economy of Retford. This is the main service centre for the extensive rural part of the district but has been falling far behind Worksop and Gainsborough in the provision of employment and retail facilities. It is not enough to say that its role will be sustained. Positive policies and action are needed to attract new commercial development and prevent Retford becoming increasingly a dormitory town. This would be consistent with the sustainability objective of reducing travel to shops and jobs and it need not conflict with conservation priorities.

23/2 There is merit in developing Harworth because of brownfield land availability and the decline in mining, but this area is not easily accessible from Retford or the eastern villages. The proposed distribution of employment land does not adequately address the need for jobs in the east of the district and does not reflect the proposal that Retford should have 26% of the district's new housing. Retford's failure to develop new jobs in recent years should not be taken as a reason not to seek growth in the future. It has been due, in part at least, to the lack of public investment in industrial sites and the closure of several large businesses with their sites being developed for housing. The provision for employment related development in Retford should be increased.

There needs to be an Action Plan for Retford town centre, as well as for Worksop and Harworth, to identify and promote opportunities for commercial development.

Policy CS3C

23/3 We welcome the suggestion of a marina in Retford. However, the policy indicates that this must be in the town centre. This is unlikely to be practical as there is insufficient land there at an appropriate level. However, undeveloped land next to the Hop Pole would be suitable. The policy should be reworded to allow for this. The presumption against new non-retail uses on Carolgate is unnecessary. There are few cafes and similar uses there now and possibly not enough. Some more would do no harm and could improve the shopping experience. There may come a time when the predominance of retailing is threatened, but we are a long way from this in Retford. The policy is not based on a sound evidence base indicating that such a restriction is necessary.

Policy DM5.

23/4 This requires housing to be of a mix informed by various documents. However, that mix is not specified and it is not clear what the policy means in practice. The policy is unclear and therefore unsound.

Policy DM7

23/4 We welcome the intended protection of existing employment sites and hope it will work. Unfortunately, most of Retford's employment sites have already been lost to housing and not replaced.

Policy DM9

23/5 This precludes development which would result in loss of 'protected open space' and the proposals map shows both sites of the former King Edward school as having this designation. This is wholly unacceptable. Outline planning permission has been given to build houses on the rear site and the future of the listed buildings on the frontage site is largely dependent on enabling development of the adjoining land. The policy would prevent such development and is not based on sound reasoning.

The policy defines 'green infrastructure' to include hedgerows and implies that no development would be allowed which would lead to a loss of hedgerow. It is unrealistic and too restrictive, preventing the creation of new accesses as well as much otherwise acceptable development where the hedge is of limited value.

Policy DM10

23/6 Much of Retford is shown on the Proposals Map as a district heating opportunity area where the policy requires developers to install district heating unless they can show good reason not to. This is a very onerous requirement which will affect the cost of building and the viability of development. Although district heating can be beneficial in certain circumstances, it is unreasonable to require it.



Where a district heating network has been established, the policy requires all subsequent development to connect into it. This would allow the developer of a district heating scheme an unreasonable hold over anyone developing adjacent or nearby land. They would be forced to connect into the district scheme even though they were not party to its provision initially and regardless of the price demanded by the district heating operator.

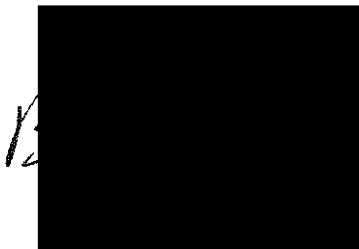
The policy is not supported by evidence that its effects on the viability of development have been properly assessed.

Policy DM12

23/7 This requires all new development to incorporate a sustainable drainage system. This is impractical within a built up area, and unduly onerous in most small scale development. Even on large sites, the provision of SuDS may be impossible due to difficulty in providing for long term maintenance. It cannot be used in connection with housing estates unless a public authority is prepared to adopt and maintain it and at present this is not usually achievable. The policy is not based on a realistic assessment of its consequences for the viability of development.

Policy DM13

23/10 This requires compliance with parking standards. These are not specified in the Core Strategy but it is clear from the wording that they require provision to be to at least specified levels. The policy is unsound as it is inconsistent with PPG13 which says that standards must be maxima and there can be no requirement to provide at least a specified number of spaces. It should merely require provision to be sufficient to avoid serious road safety or amenity problems.



Planning Policy Team
Bassetlaw District Council

