

**REGULATION 30(E)
CONSULTATION STATEMENT**

**BASSETLAW CORE STRATEGY
& DEVELOPMENT
MANAGEMENT POLICIES DPD**

JANUARY 2011

1. INTRODUCTION

This statement has been prepared, in line with regulation 30(e) of the Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008 (hereafter 'the Regulations') to demonstrate how Bassetlaw District Council has complied with regulation 28(2).

The Bassetlaw Core Strategy & Development Management DPD (hereafter referred to as the Publication Core Strategy) was published for public representations for a period of six-weeks from 8 November to 20 December 2010.

72 respondents submitted 287 'duly made' representations on the Publication Core Strategy over the six-week period. These representations ranged from suggested minor amendments to those seeking new approaches to the distribution of residential growth across Bassetlaw. This Statement provides a summary of the key themes emerging from these representations.

A paper or electronic copy of the document, together with a response form, was sent to the Statutory Consultees. Any one else with their details registered on the Council's LDF consultation database was alerted to the start of the consultation and directed to where they could find the relevant documents on the Council's website. In addition, the document was made available at the Council's offices and at Libraries throughout the District. Notices inviting representations were placed in the local press. Posters advertising the events were distributed to all Parish Councils, local libraries, community halls/centres, the Council offices in both Retford and Worksop and to the various Council Contact Centres around the District.

Given the nature and purpose of the publication stage, the District Council did not undertake as intensive a programme of community engagement activities as it had for previous formal stages. That said, Officers made themselves available for discussion 'surgeries' and coffee mornings over the consultation period; held stalls at Worksop and Retford markets; attended Parish Council meetings as required; and manned displays at local libraries. Public notices were placed in the press and on the Council's website and a further article on the Core Strategy process appeared in the local press.

2. SUMMARY OF THE MAIN ISSUES

2.1 Vision and Objectives

Representations were generally supportive of the Vision. Of the objections, the only proposed changes were that:

- there should be a reference to Retford's rail link to London;
- there should be recognition of the growth in the economy in Retford;
- specific reference should be made to the need to provide a mix of house types in the District, particularly in Harworth; and
- Rural Service Centres should be specifically referenced.

Representations were generally supportive of the Objectives. Of the objections, the only proposed changes were that:

- SO1 should only refer to Worksop, Retford and Harworth Bircotes as locations for housing growth;
- SO2 should only refer to Worksop Retford and Harworth Bircotes as locations for new employment sites and should identify the A1 corridor as a location for employment growth in its own right;
- SO3 is not clear on what it means by a 'community regeneration' opportunity; and
- SO8 should protect natural resources including mineral resources.

In relation to SO6, the two representations received were seeking opposing aims, one wishing to ensure that addressing climate change was not a universal requirement and one wishing to see the aim expanded beyond 'new development' only.

2.2 Core Strategy Policies

Overall housing numbers

The vast majority of Representations supported the Council's decision to keep to the Regional Spatial Strategy (RSS) housing targets, although some did reference the emergence of the 2008 household projections, which might have a bearing on these targets. Two representations sought to increase the housing figures (using different data and reaching different conclusions) and a few wished the figures to be regarded as minimums. A minority felt that the housing (and employment) numbers in the table on page 20 (page 21 for employment) should be included in policy, alongside the percentage splits.

Distribution of housing numbers

The main issue to emerge from the representations made on the Publication Core Strategy, and the only issue to receive substantial numbers of representations, relates to the approach taken to the distribution of Bassetlaw's housing growth. Numerous representations seek to change how the total housing growth figure is distributed between the tiers of the

Settlement Hierarchy as set out in Policy CS1. The majority of these representations state that the target for one or more settlement tier is either too high or too low. A small number seek to make specific changes to redistribute the percentage share of housing each settlement is given.

The common approach taken is to seek a rise in the amount of housing given to one settlement tier by lowering the target in one or more of the other tiers. These proposals are all then tied to site specific representations. There is, unsurprisingly, no consensus between the Representors as to the most appropriate overall distribution. By way of example, the table below illustrates the proposals from four different representations just in respect of Worksop.

Respondent	Suggested percentage share of housing to be allocated to Worksop
DLP	35%
I-Plan Solutions	42%
SSR Planning	40%
JVH Planning	55%

There was, however, strong support for seeing Worksop as the main focus for housing growth and some concern at the deliverability of the levels of growth proposed on brownfield land in Harworth.

Affordable housing

There was general support for the affordable housing targets, and the trigger point for requiring affordable housing, for the District. A very small minority objected to the use of varied targets across the District and even fewer to the new trigger point. Two representations sought higher figures for Cuckney and Worksop respectively. Repeated objection was made, however, to the suggestion that allocated sites should be assessed to establish whether they can deliver a higher percentage of affordable housing provision than the target given for that settlement.

Site allocations

As noted above, a high proportion of representations sought to promote specific sites at this stage. Most were through requests to amend development boundaries (which some representors felt were inappropriate for revision at this point), although a minority wished to see strategic allocations made or wished to see greater specificity in relation to the direction of growth of Worksop and Harworth in particular. Conversely, one representor objected to any reference to Sustainable Urban Extensions.

Settlement hierarchy

There was support for allocating growth across Bassetlaw on the basis of a settlement hierarchy and, with just four objections to the classification of some of the villages, general support for the structure of the hierarchy. It was felt

that Worksop should be re-classified as a Sub-Regional Centre, now that the RSS has been reinstated.

Release of additional housing land

There was limited concern that the policy did not provide sufficient clarity over how or when sites outside of development boundaries might be released in the event of delays to the Site Allocations DPD or lack of delivery of existing planning permissions (Misterton and Harworth were identified specifically).

Retail boundaries

Three respondents felt that the approach taken to town centre retail in the Core Strategy policies was out of line with the sequential approach set out in PPS4.

Employment land

The vast majority of relevant representations supported the District's proposed levels and distribution of employment land, acknowledging that the evidence supported high levels of future demand. Two respondents felt that the amount of employment land to be allocated to Retford should be increased, although only one proposed a new percentage figure relating to the inclusion of a specific site.

Two respondents felt that greater consideration should be given to formally allocating rural employment sites (although the document does seek to facilitate windfall employment in rural areas and this approach was supported by the NFU's representation).

2.3 Development Management policies

In contrast to the Core Strategy policies, the Development Management policies were, individually, the subject of a limited number of representations and lacked any significant common themes.

Policies DM1 – DM3: Development in Rural Areas received a small number of representations, with no common themes. Individual concerns included the requirement to market buildings for economic, affordable housing or community uses before consideration would be given to market residential conversion; the potential re-use of rural brownfield land without consideration of its natural regeneration as important habitat; the lack of a requirement that replacement buildings should be no larger than the original .

Policy DM4: Design and Character received both supporting and objecting representations. The only common theme (two representations) of objection was a request that the policy should not reference any specific guidance or professional body that could be superseded during the lifetime of the Strategy, although there was also support for the inclusion of the Building for Life reference.

Policy DM5: Housing Mix & Density attracted some objections, chiefly in relation to housing mix. Objections queried the range of documents listed to inform housing mix and how they were to be used. There was also a request that market demand should be a factor in decisions over housing mix. While there was support for an approach to density that sought to consider local character and site constraints, there was also an objection to the criteria that may be used to assess the need for higher or lower densities

Policy DM6: Gypsies, Travellers & Travelling Show People received just four objections. Three related to issues of future site location and the number of pitches and sites to be delivered. One raised objections to the criteria used to consider rural exception sites.

Policy DM7: Securing Economic Development received several supporting and objecting references. The common objections (two apiece) were concerned that the policy seemed to suggest that existing Local Plan allocations would continue to be protected and with the requirement that new non-economic development uses would need to be the minimum required to support economic development uses. There was support for the policy's flexibility in terms of its consideration of the release of poor quality or surplus employment land for other uses, with justification through viability appraisal, but one objection suggested that lack of market interest should be an additional criterion. One objector wished to see a wider range of data included alongside the Council's most recent Employment Land Study as evidence to support change of use.

Policy DM8: The Historic Environment received limited objections, with none from English Heritage. The only common objection (two representations) was concerned with the policy's treatment of heritage asset significance. Two site specific representations were received in relation to the Welbeck Estate and Creswell Crags, both of which were felt to warrant specific mention in the policy (albeit for different reasons).

Policy DM9: Green Infrastructure; Biodiversity & Geodiversity; Landscape; Open Space & Sports Facilities received a number of representations in support and objection. The only common objections were in relation to the policy's approach to protection of open space. Two objections concerned the evidence base that informed the policy. Additional objections related to a desire for greater clarity in relation to defining Green Infrastructure and specific reference to Biodiversity in the introductory text.

Policy DM10: Renewable & Low Carbon Energy received a number of objections seeking changes to the policy. Although there was support for the Council's approach in not seeking to move ahead of national initiatives, one objector felt that the Council was not being firm enough in what it was expecting of new developments in relation to renewable energy provision. A common objection (two representations) requested that text explaining the function of the Energy Opportunities diagram should sit underneath the diagram and that there should be greater clarity in section A in relation to issues of biodiversity and landscape character impacts. The potential negative

impact of this policy on the financial viability of new developments also emerged as a main issue. An additional common concern related to the viability of District Heating schemes (with one representation proposing specific thresholds to trigger their use).

Policy DM11: Developer Contributions & Infrastructure Provision received a number of representations in support and objection. Common issues (two representations apiece) were a concern that the policy seeks to ensure necessary infrastructure is in place in advance of or in tandem with new development, rather than once the development is in place, and that a viability assessment is required where proposals are not policy compliant. Three representations supported the viability assessment approach. Additional comments requested that greater consideration be given to the Community Infrastructure Levy (CIL) and the CIL regulations in the policy.

Policy DM12: Flood Risk, Sewerage & Drainage received a small number of objections, although the Environment Agency regard the DPD as 'sound'. These objections concerned the wording of the policy, which it was felt contained requirements more appropriate for a validation checklist; the need for clarification of the applicability of the Sustainable Drainage Systems section; and a request that Shireoaks be included in the list of settlements cited in the policy.

DM13: Sustainable Transport received a small number of objections. The main objection concerned the wording of the policy, which it was felt contained requirements more appropriate for a validation checklist

DM14: Ground Conditions and Land Stability received one supporting representation from The Coal Authority and two objections. The objections felt, respectively, that the policy repeats national guidance in PPG14 and that it may place an undue burden on developers.

2.4 Additional Issues raised

Key Diagram

There was an objection to the terminology used to define certain settlements.

Guidance text in policies

A number of representations objected to the inclusion of what is, in essence, guidance rather than policy direction in the policies themselves.