

## OXSPRING PARISH COUNCIL

Clerk to the Council  
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Planning Policy, Strategic Growth and Regeneration  
Barnsley Metropolitan Borough Council  
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14th October 2012

Dear Sirs

**Local Development Framework -  
Development, Sites and Places - Proposed Documents - Consultation 2012  
LD10 - 111 Low Density houses - North and South of Roughbitchworth Lane, Oxspring**

We would like to thank you for the opportunity to comment on the **proposals** for the Barnsley Development Sites and Places document. We understand that a submission of the final documents including all comments received during the consultation process will be made to the Planning Inspector in the Spring of 2013 with a Public Inquiry tabled for 2014 and we would appreciate it if you were able to notify Oxspring Parish Council, via the Clerk, of any relevant, additional or future base line studies, reports or supplementary technical information with regards to the evolving site and land use allocation and development plans for the area. This is of course in line with The Local Authorities (Executive Arrangements) (Meetings and Access to Information) (England) Regulations 2012 No 2089, Information Act 1985/Revision 2012 & best practice.

We are consequently writing to you in connection with these proposals to make you aware of our concerns as a Parish Council, in the knowledge that a number of Oxspring residents have already written/mailed you with a variety of concerns regarding your proposed development and change of land use allocation. We are also aware that Councillor Barnard, Councillor Paul Hand-Davis (Penistone East) and Angela Smith MP Stocksbridge, Penistone and Sheffield have written to you with their objections.

### **A - PUBLIC CONSULTATION**

Contrary to the Council's Statement of Community Involvement 2006, the Localism Act 2011, NPPF 2012 and Barnsley LDF Core Strategy Document adopted 2011, a prime concern is the failure to engage with the Parish Council and the residents of Oxspring with regards to the *significant* changes proposed in the Development Sites and Places Plan. We appreciate this is only a proposals document and that the consultation period to make written representations has been extended at the Parish Council's request. However,

- No post cards/letters were received by any of the residents of Oxspring setting out which Local Development Framework documents were ready for consultation, so a key core objective "*to engage with local communities*" was not met.
- The two documents that the Parish are being asked to consider, the Development Sites and

Places Consultation Draft 2012, and the Development Sites and Places Consultation Draft Sustainability Appraisal were emailed to the Parish Clerk in early August, but the Parish Council did not meet after their summer recess (in line with Parish Councils nationally) until the 2nd September. A written response was requested from The Parish by the 28th September, but after a mail shot to the residents of Oxspring, it became very clear that only one or two residents knew about the proposal to make significant changes to the land use allocation from farmland, within the green belt area - identified as an area of Borough Landscape Value (UDP) - to housing.

- The Statement of Community Involvement specifies that the LPA will conduct presentations at meetings and Area Forums. However, Area Forums no longer exist and consequently the Parish Council asked representatives from the LPA to attend a public meeting for residents to hear about the development plan document and to ask questions. The LPA agreed to attend a Parish Council meeting, but they made it very clear that no questions would be taken from the public.
- At one of the Local Authority's Planning and Localism Act surgeries in Penistone held in March 2012, representatives of the Parish Council were very clearly advised that there would be no major developments in Penistone's surrounding villages on green belt land.

Therefore we consider that there has been lack of due diligence to "**engage with local communities**" and for your spatial planning strategy to be "**community led**", thus failing to achieve *'The Government's aim to strengthen local democracy, accountability and transparency through the Localism Bill'*.

## **B - CHANGE OF LAND USE ALLOCATION**

### **1. Loss of Green Belt**

The Parish Council believes that the proposed change of use from Green Belt and Farm Land to housing development is contrary to Barnsley's key strategic policy objectives and Government advice as outlined below:

Core Strategy Objective 8 : To protect and improve the countryside and natural environment by:

- Protecting the countryside, green belt and green spaces from development and seeking opportunities for their improvement.
- Under the Statement of Consultation Summary of Changes made to the Core Strategy (CSP 28) regarding the distribution of new homes, the LPA's recorded response is that (*housing growth in villages is not sustainable or in line with the RSS and furthermore that a full scale review of the green belt will not be required to deliver the Spatial Strategy*) (page 27/28).
- According to Planning Policy Statement 2 (which is one of the base documents used in the preparation of the LDF) development plans in existing villages in Green Belt land should not allow for new building beyond the categories in paragraph 3.3 (PPS 2). Furthermore, following the Public Inquiry of the Core Strategy, the Inspector and the LPA agreed that Green Belt would only be developed to deliver employment targets. (CPS 34).
- In the Core Strategy document key diagram, it shows the Oxspring area as a village within the Green Belt. The LDF 2005 shows the site (land North and South of Roughbitchworth Lane, Oxspring) in the Green Belt.

- In 2005 Oxspring Parish Council asked the LPA to retain and safeguard the land at LD10 as Green Belt land.
- Green Belt land should only be altered in *very exceptional circumstances*, (NPPF Paragraph 83). Given that there is sufficient land outside the Green Belt, which also includes the safeguarded sites, the Sites and Places document does not determine that building high value dwellings in the Green Belt is considered to be a '*very special circumstance*', it can only therefore stipulate that the need for low density housing is a consideration which should be weighed against the harm to the Green Belt.
- The promotion of large low density housing in rural locations away from services and facilities would not deliver sustainable development or Green Belt purposes.
- Core Strategy Paragraph 5.12 states that "*Sustainability and Climate Change Proposals will be supported where they deliver improved quality of local landscape and protection of the character of the wider countryside*".

CPRE (Briefing Document on the Green Belt 2012) says "The Green Belt is the most popular planning policy in England and the envy of the world. In times of economic slowdown, politicians can sometimes be tempted by the false promise of any easy construction boom . But destroying the countryside is not the path to lasting prosperity".

## **2. Low Density Housing Allocation (LD10)**

The Parish Council believes that the proposal for policy LD10 i.e. land identified for low density housing and to include 111 dwellings is a significant departure from key objectives set out in the LDF and Core Strategy and therefore will not meet key set objectives and national guidance as follows:

- The Core Strategy identifies Policy YHG of the RSS which seeks to prevent the dispersal of development to smaller settlements and open countryside. The Core Strategy then says that no significant development is envisaged in these villages and development will only be allowed if it is consistent with green belt policy (Paragraph 8.42) As discussed in section B - 1 of this document.

### Sustainable Development

- Objective 1 of the Core Strategy - To be the spatial interpretation of the Sustainable Community Strategy - New Development is in places where it has to be accessible and inclusive, therefore, development and growth will be focussed on urban Barnsley and the Principal towns.
- Objective 4 - To make efficient use of land and infrastructure by: Utilising previously developed land in sustainable locations and making the best use of existing and proposed infrastructure.
- According to Barnsley's LDF Housing Assessment Methodology (April 2010 and revised 2012) Key Principles suggest that the location of new housing development should support a sustainable pattern of development that will alleviate carbon dioxide emissions.
- "*As a general rule of thumb, the more services within 800m the more sustainable the site is. However, the assessment recognises that some facilities are more important than others such as those that provide for essential day to day needs in terms of role and function. On this basis the scoring system is based on an assessment of:-*"

### ***Essential Services***

*Public open green space*  
*Local convenience store*  
*Doctors surgery*  
*Primary school*

### ***Other Services***

<i>Post office</i>	<i>Village/ community hall</i>
<i>Hospital</i>	<i>Retail (e.g. shopping parade)</i>
<i>Chemist</i>	<i>Church</i>
<i>Banking facility</i>	<i>Secondary school</i>
<i>Supermarket</i>	<i>Sports centre</i>
<i>Public house</i>	<i>Benefit agency</i>
<i>Library</i>	<i>Petrol station</i>
<i>Job centre</i>	<i>Tertiary college</i>

Oxspring village has only one of the facilities marked as essential on the Housing Assessment Methodology - a public open space. LEA figures identify the local primary school at capacity and over subscribed, as are neighbouring schools at Thurgoland and Springvale. Access to the Junior and Infant Schools will be very difficult in the Village, as the local school is almost full to capacity unless it ceases to offer its out of school club service (See letter from the Chair of Governors from Oxspring School dated 26th September 2012).

The village only has a small Post Office with very limited access to essential shopping facilities. There are none of the essential services, this includes no healthcare/doctors surgeries and no dentists in the village and public transport is very limited.

- The LPA's Background Paper 2 Housing Preferred Options October 2005 Threshold Work states that "***We believe it is difficult to identify a definitive population size that could be regarded as sustainable (...) We are promoting only limited housing development in settlements under 3000 because they contain relatively few facilities and people will therefore need to access facilities outside of the settlement***".

Both the 2001 and 2011 Census show that the population for Oxspring is approximately 1200, well below this threshold. and therefore with very limited facilities, as outlined earlier, to sustain both the existing population and any future increase. To access such facilities the local population, and any future increase, will have to rely on accessing such services by car.

The LPA Core Strategy does not identify Oxspring as an Accessibility Improvement Zone. Furthermore the policy document states that public transport services are particularly important as these provide access to centres of employment and major services and facilities, particularly for people without access to a car. The Core Strategy Objective 2: "To improve access, movement and connectivity with sustainable travel, outlines that this will be achieved by:

***Reducing the reliance on the private car and encouraging walking and cycling***  
***Reducing green house gases and other r pollutants to improve air quality***

As already mentioned the village only has very limited access to public transport. The distance to the nearest train station is a 30 minute walk (approximately 2.5 miles) and despite the proximity to the Trans Pennine Trail there is also poor pedestrian and cycling access to important facilities i.e. doctors, healthcare services, dentists, primary schools and a local convenience store.

Local roads such as Roughbitchworth Lane, Back Lane, Park Lane and Long Lane are narrow country lanes or single track roads which are wide enough for only one vehicle at a time and already running to capacity with local and commuter car journeys, large volume transit trucks and agricultural transport, including the movement of cattle/livestock and farming. Serious congestion

is experienced on a daily basis to access the local school entrance, which is particularly difficult for infants at the junctions with Roughbitchworth Lane and Mayfield, the bridge over the Trans Pennine Trail and the busy Penistone Road.

Already new housing developments at Green Road in Penistone are generating additional traffic on such limited capacity. Oxspring Parish Council believes that the **cumulative** effect of additional development for housing in the area, which will have to rely heavily on car journeys to access services and employment, will be contrary to the principles of sustainable development and therefore not in line with Core Strategy principles. It will also be contrary to NI 188 National Indicators in the Local Area Agreement, requiring Barnsley Council to reduce CO2 emissions by 40% by prioritising developments in towns which are well served by sustainable modes of transport reducing congestion and the need to travel by car, and increasing levels of cycling and walking.

- Barnsley Core Strategy Objective 6 - To ensure all new development is sustainable designed and built to the highest standards by embracing the principles of sustainable design including measures to prepare for, adapt to, and reduce impact on climate change and mitigate flood risks.

The land surrounding the existing Fields End and Brookfield site and the proposed new sites off Roughbitchworth Lane is sloping farm land. Rainwater runs off these fields and down towards the Trans-Pennine Trail, the village's playing fields and Sheffield Road. Any heavy rain fall causes major problems with flooding on the Fields End development and water gushes through the walls at the back of Fields End into the gardens. It then runs down the drives to the main Fields End Road and eventually down towards Brookfield.

The junction across from the Wagon and Horses going up Bower Hill is frequently flooded and indeed one of the houses in Millstones has to sand bag his front garden to prevent rainwater from getting into his house and garden. Cheese Bottom is another very susceptible area for flooding and the road is frequently closed after heavy rain fall.

In 2010 the Parish Council expended some £44,000 to improve the drainage from the farm land above the Trans-Pennine Trail and Mayfield, as well as the excess water being piped from the Trans-Pennine trail to the same culvert. This was meant to alleviate some of the problems with water flooding the village's playing field and eventually the main Sheffield Road. The drain was upgraded to cope with approximately 50% more water than was being diverted to the drain at the time. However, in the flash floods in Spring this year, the culvert was running to capacity.

Despite such improvements large areas within the Village are identified as requiring regular flood warning notification and being within Flood Risk Zones 2 and 3. Therefore Oxspring Parish Council considers that the proposed development at LD10 will be contrary to the principles of sustainable development and therefore not in line with Core Strategy principles.

## **C - NEIGHBOURHOOD PLAN**

In line with the Localism Bill, the Parish Council and residents of Oxspring, with the assistance of PAE, are in the process of producing a Neighbourhood Plan and would like the time and opportunity to properly consult with the village residents to produce a viable Neighbourhood Plan. The plan will focus on delivering "Sustainable Development" to the Village and take account of Barnsley Council's LDF and Core Strategy objectives. This will include consideration to key economic challenges for the Village and the Borough including viable long term jobs for the village.

## **CONCLUSION**

The proposals made in the DPD could have major negative implications for our village. We believe that these are unsustainable and not in line with Barnsley's Core Strategy and national guidance. The parish Council therefore opposes any such proposals and changes in land use allocation including the proposed significant development of 111 homes to the land North and South of Roughbitchworth Lane.

The Parish Council believes that it is essential that the LPA advise of the progress being made through each of the stages, particularly when and if you decide to either remove the proposal from the consultation document or to leave it as it is for future Public Planning Inquiry. We would also request that you advise us if you discount any of the concerns raised by us or any resident of Oxspring and also tell us why you have discounted them.

We therefore request that regular contact is made with the Parish Council through the Clerk to the Council, so that we are in a position to appraise your comments and to advise the residents of Oxspring regarding how the consultation process is proceeding.

We look forward to hearing from you in due course and we trust that you will take the time to answer the questions we have raised and to seriously consider the concerns we have regarding your proposal.

Yours faithfully

Stephanie Tolson  
Clerk to the Council