

Our Ref: YL-PB-OF-02

Mr Gladstone
Executive Director
Development, Environment and Culture
Barnsley Metropolitan Borough Council
PO Box 604
Barnsley
S70 9FE

5th June 2015

Dear Mr Gladstone,

**DRAFT LOCAL PLAN SITE REFERENCE – SAF 18 - LAND NORTH AND SOUTH OF
ROUGHBIRCHWORTH LANE – OXSPRING**

We write to provide you with further information in respect of the proposed Safeguarded Land designation of the above site within the emerging Barnsley Local Plan. This Letter should be read in conjunction with the letter Reference YL-PB-OF-01, sent to yourself on 5th June 2015.

Site SAF 18 comprises of two Green Fields to the South of Oxspring which are bisected from North East to South West by Roughbirchworth Lane. The annotated Aerial Photographs attached to this letter (Appendix A) clearly identify that the North Western boundary of the site is wholly arbitrary and does not follow any physical feature or logical field pattern and is therefore not defensible. The Remaining site boundaries are formed by dry stone walls, a feature abundantly present throughout the wider area and cannot be considered a credible feature from which to provide a long term, permanent, Green Belt boundary. Barnsley Metropolitan Borough Council's (BMBC) own Independent consultants (Arup) themselves recognise at page 21 of their Green Belt Review Approach and Method report that Natural Field Boundaries are soft boundaries lacking in durability. In contrast Arup also confirm that The Trans Pennine Trail, a dismantled railway, could represent a strong internal boundary.

This site was previously proposed as a draft 'Low Density' Housing Site (reference LD10) within the Council's Development Sites and Places Document DPD of 2012; however, the land has remained permanently outside of Green Belt designation since the 1960's. The site measures 5.10 hectares in size and on the basis of the site's historical planning context it can be considered that it is safeguarded for the delivery of between 100 and 150 new homes.

The proposed development of Site SAF 18 site has previously attracted opposition from residents of the Parish. Oxspring Parish Council (OPC) and Hunshelf Parish Council have also previously submitted formal letters of objection to BMBC via the Draft Local Plan Consultation process citing a number of concerns, including an increase in traffic using narrow country lanes and also surface water drainage/flooding issues. More recently, it was confirmed by OPC (in their November 2014 meeting minutes at section 5A) that the landowner of the site has stated he is not willing to make the land available for development.

Our client, Yorkshire Land Limited (YLL) have successfully developed land in the Western Part of the Borough for over 26 years and were instrumental in the delivery of the Brookfield development which is situated directly adjacent to the Southern Eastern part of Site SAF 18. Due to their involvement with the Brookfield site, YLL have a robust knowledge, which both they and their consultants have utilised in the assessment of Site SAF 18's deliverability.

This letter considers the planning merits of the retention of Site SAF 18 as Safeguarded Land outside of the Green Belt. It compares the site against our client's proposed development site Oxspring Fields, Oxspring. Comprehensive details of YLL's Oxspring Fields development proposals have been submitted to BMBC for their consideration as part of the consultation process of the emerging Local

Plan. A summary of which is presented in the letter Reference YL-PB-OP-01, sent to yourself on 5th June 2015 and referred to above.

Our assessment of the planning credentials of Site SAF 18 against YLL's Oxspring Fields development proposals has considered the following matters:-

- Local Planning Policy Context;
- Emerging Barnsley Local Plan Evidence Base Documents;
- Further Assessment Work; and
- Assessment against of the NPPF Green Belt Purposes.

Our assessment concludes that the retention of Site SAF 18 outside of the Green Belt is not consistent with National and Local Planning Policy Guidance. As a consequence Site SAF 18 should be re-designated as Green Belt land in exchange for our client's site at Oxspring Fields, which does not fulfil any of the five Green Belt purposes and would align with the historic settlement character of Oxspring and the landscape character of the area.

LOCAL PLANNING POLICY CONTEXT

Barnsley Unitary Development Plan

BMBC has the ability to return land back into the Green Belt and we believe that this is a wholly appropriate process to include within the Green Belt Review and to be undertaken as part of the emerging Barnsley Local Plan.

The Barnsley Unitary Development Plan (UDP) identifies that, in the period from 1974 to the UDP's adoption in December 2000, 2,590 hectares of land was added back into the Green Belt, an increase of 12% (Paragraph 3.18 Volume 1). This approach was utilised by the Council in the preparation of the policies for the Western Rural Community Area, as identified in Paragraph 4.10 Volume 13 of the UDP. As part of this holistic review process Site SAF18 was retained outside of the Green Belt and designated as Safeguarded Land in the UDP.

Of further importance to the planning policy context of the area is the identification in Paragraph 4.12 of Volume 13 of the UDP which identifies that Oxspring is identified as a location in the Western Rural Community Area for additional development because of its "*physical relationship to the Penistone Urban Area and because it has the infrastructure capacity to accommodate some further development without serious detriment to the quality and character of the Green Belt*". Accordingly, housing allocations and safeguarded land designations were identified in Oxspring. In respect of the safeguarded land designation in the Village the UDP states that "*if, in the long term, there is a need to release further land for housing then there is the scope to accommodate additional development*". Since the adoption of the UDP, Oxspring's inextricable relationship with Penistone has increased on account of the housing and employment developments that have taken place. These developments have provided further links between the two settlements and furthermore the emerging Local Plan identifies Penistone's only proposed Employment Allocation, Site Reference P2 Land North of Sheffield Road (3.27Ha), is located within the Parish of Oxspring.

In compliance with the guidance presented in the UDP we believe that BMBC have the capability to return land back into the Green Belt. Furthermore, on account of Oxspring's recognised physical relationship with Penistone and the Village's capacity to accommodate development, we consider that housing and safeguarded sites are required to be identified in the Village in the emerging Barnsley Local Plan. As a consequence, YLL believe that BMBC are in a defensible position to re-designate Site SAF 18 as Green Belt and in turn remove the Oxspring Fields site from the Green Belt. Further evidence to affirm this position is provided below.

Barnsley Core Strategy & Emerging Barnsley Local Plan

The Barnsley Core Strategy, adopted September 2011, was prepared without the undertaking of a review of the Green Belt. This was due to consideration at the time that the planned growth with respect to housing numbers could be accommodated without the need to encroach into the Green Belt

(Paragraph 6.5). Consequently, only a localised review of the Green Belt was due to take place to include minor changes to the Green Belt boundary to address such things as mapping anomalies, accuracy issues and changes in physical features and to provide more defensible boundaries.

BMBC have identified in the Draft Barnsley Local Plan (November 2014) that this stance is set to be overturned. Paragraph 3.25 of the document identifies that the housing and employment needs and aspirations of the Borough cannot be accommodated without the need to release land from the Green Belt. Consequently the document identifies that BMBC have undertaken a Green Belt review as part of the evidence base for the Local Plan which has resulted in the proposal to take out of the Green Belt around 190 hectares of land for housing and around 70 hectares of land to be safeguarded in order to meet longer-term development needs stretching beyond the plan period.

The Draft Barnsley Local Plan identifies in Paragraph 3.26 that further minor changes will also be made to the Green Belt boundary to address such things as mapping anomalies, accuracy issues, changes in physical features and to provide more defensible boundaries than those currently identified.

Paragraph 3.27 of the document further identifies that changes to the Green Belt will be shown on the Policies Map and that further plans are available in the Green Belt background paper, which also sets out the exceptional circumstances to justify alterations to the Green Belt boundary. Discussions with BMBC's Planning Policy Officers have identified that the Green Belt background paper has yet to be finalised and that the Barnsley Green Belt Review is therefore the key evidence base document that underpins the Council's current approach to Green Belt release across the Borough.

With regard to current proposed land allocations and designations, Site SAF 18, located to the North and South of Roughbitchworth Lane, is identified to be retained as Safeguarded Land within the emerging Local Plan. The document does not however provide any justification for the site's designation. In addition, and of importance in respect of the historic development pattern of Oxspring and the settlement's links to Penistone, Penistone's only proposed employment allocation, Site Reference P2 Land North of Sheffield Road (3.27Ha) is located within the Parish of Oxspring.

The adopted Unitary Development Plan and emerging Barnsley Local Plan provide a planning policy context for the release of land in the village of Oxspring for future development. However, no justification is provided within the emerging Draft Barnsley Local Plan for the retention of the Safeguarded Land designation Site SAF18. We presume that this decision was reached in continuation of the site's historical planning context. However, a review of the emerging Barnsley Local Plan evidence base should provide justification for BMBC's approach.

EMERGING BARNSELEY LOCAL PLAN EVIDENCE BASE DOCUMENTS

Barnsley Green Belt Review

In 2014, 'Arup was appointed by BMBC to assist with the preparation of the Green Belt Review, which will form a part of the evidence base informing the Barnsley Local Plan. The purpose of the Green Belt review is to provide an independent and objective appraisal of Green Belt against the five nationally-defined purposes of the Green Belt.

The Green Belt Review did not undertake an assessment of Site SAF18 against the five purposes of the Green Belt.

We consider it quite disconcerting that Site SAF18 was not included within the Barnsley Green Belt Review. Historical decisions taken in respect of the allocation/designation of land and the pattern of settlement growth should not simply be repeated. The characteristics of both proposed development sites and the character of settlements and their surrounding area can substantially change over the course of time, as can planning policy and guidance. Furthermore, additional development sites can be promoted by land owners which provide, in some instances, more appropriate development opportunities in light of up to date evidence and planning policy.

As a starting point we believe that it is of paramount importance that when identifying site allocations and land designations within the emerging Barnsley Local Plan, an up to date assessment of all

proposed development sites should be undertaken. Not simply newly proposed sites, especially where a site was removed from the Green Belt in the 1960's.

Notwithstanding the above, the report which relates to the area closest to Safeguarded Land Site SAF18 is contained within sections PEN2 and PEN11 of Arup's Barnsley Green Belt Review document. Our client's Oxspring Fields development proposals are also located in assessed area PEN11. Annotated aerial photographs identifying the boundaries of these areas are enclosed (Appendix B).

The North Western parcel of Site SAF18 is located in the eastern section of general area PEN2. The document identifies the following key points in respect of area PEN2:-

- Generally, safeguarded land and allocations made by the UDP proposals map do not strengthen this boundary but enforce its irregularity.
- The existing Green Belt boundary is particularly weak to the south of Oxspring around Roughbirchwood Lodge.
- Land at locations to the east of the assessed area are more open.
- To the east of Long Lane, the existing Green Belt boundary is stronger, with the Trans Pennine Trail and the railway line providing permanent boundaries and checking further sprawl between Penistone and Oxspring.
- The strength of the boundary at Roughbirchworth Lane is under pressure from development and is weaker where it reconnects with Oxspring; however, overall the Green Belt to the east of Long Lane fulfils Green Belt purposes to a greater degree.

It is clear from the Green Belt Review that the development of the North Western parcel of Site SAF18 would only aid in re-enforcing the area's weak defensible boundary irregularity and that a more appropriate long term defensible boundary would be the Trans Pennine Trail given the openness of the area to the east of Long Lane. A characteristic that provides justification for the retention of this area in the Green Belt.

Both the South Eastern parcel of Site SAF18 and our client's Oxspring Fields development site are located in general area PEN11. The report identifies the following key points in respect of area PEN11:-

- The Trans Pennine Trail within a dismantled railway could represent a strong internal boundary, should the General Area be considered for sub-division.
- The Green Belt in PEN10 has sought to focus development to other land within Oxspring, although the area of safeguarded land off Roughbirchworth road will appear to weaken the integrity of the Green Belt.

With regard to the retention of Site SAF18 as Safeguarded Land within the emerging Local Plan the key conclusion for the Green Belt Review is that the site would *"appear to weaken the integrity of the Green Belt"*.

With regard to YLL's Oxspring Fields development proposals, the assessed area PEN11 covered land located either side of the Trans Pennine Trail, a key locational characteristic which we believe should have been used as the assessment area boundary. Particularly when considered against the conclusions of the assessment as identified above.

The assessed area of PEN11 located to the North East of the Trans Pennine Trail, where our client's proposed Oxspring Fields development is located, benefits from a strong defensible boundary further to the North East in the form of the B6462/Sheffield Road. Whereas to the South west of the Trans Pennine Trail, where the southern parcel of Site SAF 18 is located, there are no logical boundaries until Cross Lane, which is located almost 1km from the Trans Pennine Trail.

As a consequence it can be argued that our client's proposals have not been assessed appropriately as they have been included within an assessment area that shares entirely different environmental characteristics to those located to the west of the Trans Pennine Trail. Alongside the non-assessment of Site SAF 18 within the Green Belt Review, we believe this provides a further reason to warrant a review of the document prior to publication of further versions of the Barnsley Local Plan.

Furthermore, our client is also disappointed that the Works site (identified as a 'depot' on the map of general area PEN11) was not specifically identified as a further strong defensible boundary to the southern area of PEN11. If you include this boundary alongside the Trans Pennine Trail, the B6462/Sheffield Road and the existing settlement area of Oxspring, it is clear that our client's Oxspring Fields development site benefits from defensible boundaries on all sides. The same cannot of course be said for Site SAF 18.

Similar concerns to those that we raise above in respect of the soundness of the Green Belt Review have also been identified by Inspector Stephen Pratt, whom criticised the Green Belt assessment used to inform the emerging Cheshire East Local Plan, which was also undertaken by Arup. In his 'Interim Views' report, which consequently resulted in the current suspension of the examination hearings, Inspector Pratt concluded that the process and evidence relating to the proposed amendments to the Green Belt were flawed. The following paragraphs from the report highlight the Inspector's key concerns:

'...in some cases, land which makes a major or significant contribution to the Green Belt is proposed for release, whilst other sites which only make a limited contribution to the Green Belt do not seem to have been selected. Although the release of land from the Green Belt was based on several factors, this suggests that insufficient weight may have been given to the status and value of certain sites in Green Belt terms compared with other factors such as land ownership, availability and deliverability, when preparing and finalising the plan.'

Inspector Pratt, Interim Views, para 83

'...although the assessment does not recommend the release of specific sites and aims to identify strategic land parcels, it seems somewhat inconsistent in assessing relatively large tracts of land in some cases, whilst dealing with much smaller sites in other areas; it may not be as finely grained as it could have been, omitting some smaller parcels of land on the fringes of settlements which might have had less impact on Green Belt purposes.'

Inspector Pratt, Interim Views, para 85

We believe that a more detailed Green Belt assessment should be undertaken which considers each of the points we raised above. Without the undertaking of this further work we are of the view that it is highly probable that an inspector would also find the Barnsley Green Belt Review flawed for similar reasons to those identified, which could lead to the whole emerging Local Plan being considered unsound.

Whilst we have concerns over the soundness of the Green Belt Review for the reasons identified above, it is clear from this element of BMBC's own evidence base that there is no robust, up to date, justification for the retention of Site SAF 18 as a Safeguarded Land designation for future housing development. Even without a site specific assessment of Site SAF 18, clear evidence is presented in the Green Belt Review which identifies that the retention of the site as Safeguarded Land would weaken the integrity of the Green Belt on account of a lack of defensible boundaries and openness of the area immediately surrounding the site. A position that is entirely the opposite to that of our client's proposed development site at Oxspring Fields.

Barnsley Strategic Housing Land Availability Assessment

During 2012, BMBC commissioned Independent Planning Consultants 'Peter Brett Associates' (PBA) to undertake a Strategic Housing Land Availability Assessment (SHLAA) for the Borough. Site SAF 18, assigned unique identifier reference 341, achieved a Category 2 deliverability rating on account of a number of site constraints including Access, Drainage and Suitability. The SHLAA also assessed that the site was considered to have a bad neighbour, this being a working Dairy farm situated adjacent to the west of the site, which could cause potential amenity issues to any prospective residents of the site.

It is therefore clear from this element of BMBC's evidence base that there is no robust, up to date, justification for the retention of Site SAF 18 as a Safeguarded Land designation for future housing development.

By contrast, the Oxspring Field's development site, assigned unique identifier reference 681, achieved a Category 1 'deliverable' development site rating on account of the site performing well against a number of suitability, availability and achievability criteria. The SHLAA also assessed the potential impact of the site on the character of the landscape and concluded that the site could accommodate high quality, low-density housing in a location likely to be highly attractive to the market.

Consequently, BMBC's own evidence base clearly establishes that the Oxspring Fields development site is a more deliverable housing site than the Safeguarded Land site SAF18.

FURTHER ASSESSMENT WORK

YLL's Landscape Consultant, Smeeden Foreman, prepared a Landscape Statement (May 2014) which has previously been submitted to BMBC for their consideration in the preparation of the Barnsley Local Plan. The document is enclosed with this letter for ease of reference (Appendix C). The document considered the historical settlement pattern of Oxspring, the baseline environmental position of both Site SAF 18 and YLL's Oxspring Fields development site and finally the potential environmental impact on the character of Oxspring should they be developed.

Over the last two centuries, the settlement of Oxspring has developed in a linear form along the River Don valley, with isolated rural farmsteads and small hamlets scattered over the remaining landscape. When the Railway arrived in the mid-19th Century, it provided another strong boundary to the southwest providing an additional force to influence the already established linear pattern of development along the River Don Valley. The Combination of River and Railway has thus provided the syntax and framework for a strong linear pattern of development in this location over the last two centuries.

More recently during the late 20th century and early 21st century, development has contravened this established historic development pattern by moving to the southwest of Oxspring towards the hamlet of Roughbirchworth. Any further development towards Roughbirchworth would therefore both ignore and conflict with the historic linear pattern of development and effectively cause coalescence between the settlements.

The importance of retaining the historic settlement pattern of Oxspring in the future planning decisions of BMBC was also noted in a meeting which took place on the Oxspring Parish Sports Field on 25 February 2014 between a senior BMBC Planning Officer, Ms Helen Willows, and representatives of the NPG including the then Chair, Ms Ruth Rovira-Wilde, where Ms Willows stated:-

"We'll (BMBC) be looking at the historic development and form of Oxspring and how to support that and how to not change it, change the character so that it loses what's important about Oxspring."

With regards to Site SAF18 the Landscape Statement identified that further development to the southwest would both ignore and conflict with the historic linear pattern of development in the Don Valley area. It further stated that:-

Development to the southwest of Oxspring, toward Roughbirchworth, is already beginning to encroach upon the rural nature of the hamlet. Further development towards Roughbirchworth is likely to have a profound impact on the rural nature of this hamlet and effectively begin a coalescence between these two settlements. In addition, this site clearly has a more arbitrary boundary with no natural or clear edges which could help define a barrier for future development.

In comparison the Landscape Statement identifies that YLL's Oxspring Fields development proposal:-

"Represents a natural extension of the historic settlement pattern along the River Don valley between two clear, strong and defensible boundaries; the River Don and the old railway line and embankment. Furthermore, the site is also sandwiched between two existing areas of development; Oxspring village to the northwest and the largely disused industrial site to the southeast, creating clear, well defined barriers to prevent further expansion."

Enclosed with this letter is an annotated Aerial Photograph of site SAF 18 (Appendix A), which clearly evidences that the North Western part of the site lacks any physical boundary and does not even follow

a logical field pattern. The remaining boundaries are formed only by weak dry stone walls, which are abundantly present throughout the area and cannot be considered a credible long term, permanent and defensible Green Belt Boundary. Arup themselves recognise such a feature as a soft boundary lacking in durability at page 21 of their Green Belt Review Approach and Method report. By contrast, the Oxspring Fields Development site benefits from four existing strong physical boundaries as described above.

Furthermore, in respect of retaining the historic settlement pattern of Oxspring, enclosed is a plan that super-imposes YLL’s proposed Oxspring Fields development site onto the Draft Local Plan proposal map 51 (Appendix D). The enclosed plan provides further evidence that the development of the site would provide a natural extension to the historic settlement pattern of Oxspring. The Western Boundary of the Oxspring Fields site is only 140 metres distance from the Waggon and Horse Public House which forms the Historical Centre and Heart of Oxspring.

Finally, the Landscape Statement includes a comparison of the Site SAF 18 (identified using the site’s previous reference: LD10) against our client’s Oxspring Fields development proposals considering a variety of assessment areas. The conclusions reached are provided in the table below. The evidence provided to substantiate these conclusions is set out in the report.

SUMMARISED COMPARISON OF THE PROPOSED SITES LD10 AND OXSPRING FIELDS		
	LD10	Oxspring Fields
Mitigation and restoration	The size of LD10 provides limited opportunities for additional mitigation planting or restoration of boundary walls.	Oxspring fields provides a generous mitigation area with proposals to plant significant screening vegetation. Proposals also include ground modelling and restoration of derelict dry stone walls. Furthermore, the site is well screened by existing landform and topography; the visual screen provided by the old railway embankment and its location at the lower part of a valley.
Ecology and green infrastructure	Initial ecology assessment suggests high badger activity with what appears to be a main sett within the site which could be impacted by development. There are not currently any plans for this site that would suggest any consideration for ecological improvements or green infrastructure.	Initial ecology assessment suggests some badger activity adjacent to the site, although there was no evidence of a main sett nearby. Furthermore, this site represents an opportunity to create an overall net gain in terms of habitat and biodiversity due to generous mitigation areas and introduction of a number of habitats defined by the local Biodiversity Action Plan. Site proposals would also contribute to the wider green infrastructure and flood alleviation in the Don Valley area.
Transport and local services	This site would rely on minor roads running through a residential area to connect to the main road through the village, the B6462. Thus creating unnecessary intrusions into the lives of residents in this area. No bus stops adjacent to site.	This site would connect directly to the B6462 Sheffield Road, minimising potential intrusions on local residents. Proposals also connect the site directly to the Pennine way cycle and pedestrian route and local bus routes. There is a bus stop adjacent to the site.

Settlement Pattern	<p>This development contradicts the existing centuries old linear settlement pattern that has developed and would impact upon the rural nature and identity of the adjacent hamlet of Roughbirchworth, forming the beginnings of a coalescence with this neighbouring settlement. Furthermore, there are no strong or well defined boundaries to this development that might help to define a clear interface between settlement and green belt.</p>	<p>This site respects the existing historic linear settlement pattern between the well-defined existing boundaries of the river and old railway line. It is further defined by the B6462</p> <p>Sheffield Road, and adjacent, largely disused industrial site.</p>
Leisure and Recreation	<p>The size and location of this site would severely limit the possibilities for the introduction of, or improvements to, leisure and recreation facilities.</p> <p>There are not currently any plans for this site that would suggest any consideration for leisure or recreation improvements</p>	<p>The Oxspring fields Leisure & recreation proposals include:</p> <ul style="list-style-type: none"> • Improvements to the existing sports field by creating a community/ sports centre and associated play area; • Additional woodland recreational area and walking routes; • New and improved connectivity to existing walking & cycling routes; • Additional walking route and connection to Trans Pennine Trail

In addition to the Landscape Statement, Smeeden Foreman also prepared a response to the Barnsley Green Belt Review on behalf of YLL. The response dated 23rd December 2014 is enclosed with this letter (Appendix E) and concludes that:-

“Our report reinforced what is apparent to even casual observation which is that the SAF18 site is as equally capable of supporting Green Belt purposes as any other area in Pen11. Furthermore it was our opinion that development of SAF18 was harmful to the Green Belt, in part because there was a danger of coalescence with the hamlet of Roughbirchworth and most importantly because it entirely ignored the important principle that new Green Belt boundaries should be clearly defined by enduring physical boundaries.”

“It is our assessment that the aspirations of the Neighbourhood Plan committee to deliver benefits for Oxspring; the resolve of the planning officer to respect and reflect the historic pattern of the settlement of Oxspring; and the support provided by the Green Belt Study for Pen11 all serve to question the value of the proposed SAF18 designation and reinforce our positive assessment of the landscape benefits, amongst others, that would arise were the Oxspring Fields site to become the preferred option to deliver the Council’s objectives for a mix of housing types for Oxspring”.

It is clear that the further assessment work undertaken by our client confirms that no robust evidence is presently available to justify the retention of Site SAF 18 as Safeguarded Land in the emerging Barnsley Local Plan. In contrast, an abundance of evidence is available to support the identification of our client’s Oxspring Fields development proposals as a housing land allocation.

Importantly, this letter has not sought to make reference to the large number of housing and community benefits that the Oxspring Fields development proposals can deliver, which Site SAF 18 cannot. This information is presented in our letter referenced YLL-PB-OF-01 dated 5th June 2015 and we request that this is taken into account in the holistic assessment of YLL’s Oxspring Fields development proposals.

NATIONAL PLANNING POLICY FRAMEWORK – ASSESSMENT AGAINST THE GREEN BELT PURPOSES

The Landscape Statement prepared by Smeeden Foreman, referred to above, also included an assessment of Site SAF18 (identified using the site’s previous reference: LD10) and our client’s Oxspring Fields development proposals against the nationally defined five Green Belt purposes. The conclusions reached are provided in the table below. Again, the evidence provided to substantiate these conclusions is set out in the report.

GREENBELT 5 PURPOSES CHECKLIST	LD10	OXSPRING FIELDS
1) Checks the unrestricted sprawl of large built-up areas	NO - Increases potential for sprawl due to poorly defined and arbitrary boundaries	YES - Decreases potential for sprawl being contained within well defined, strong boundaries
2) Prevents neighbouring towns merging into one another	NO - This development will begin a coalescence with the neighbouring hamlet of Roughbirchworth	YES - Does not encroach on any neighbouring settlements
3) Assists in safeguarding the countryside from encroachment	NO - Increases potential for encroachment due to poorly defined and arbitrary boundaries, exposed position and lack of provision for mitigation	YES - Due to strong physical boundaries, this site is a natural end to development in this area. Significant provision for mitigation proposals will help to blend the site in to the landscape
4) Preserves the setting and special character of historic towns	NO - Contradicts historic development pattern of Oxspring. No provision for character improvements	YES - Preserves historic development pattern of Oxspring, improves village approach, restores drystone walls and includes a generous amount of woodland, mitigation planting and habitat development
5) Assists in urban regeneration, by encouraging the recycling of derelict and other urban land	NO - There are no current plans for this site to encourage the regeneration of any derelict urban land	YES - Provides partial assistance with regeneration of derelict land around Penistone station through funds generated from the development of this site

The conclusions of the assessment provided above present’s further justification that Site SAF18 fulfils identified purposes of Green Belt. Whereas the development of the Oxspring Fields proposals would not and could also strengthen the Green Belt in the surrounding area of the site and settlement.

As a consequence it is clear that our client’s proposals at Oxspring Fields out-perform the existing Safeguarded Land Site SAF18 in respect of Green Belt characteristics.

CONCLUSION

In view of the above evidence, YLL believe that BMBC are in a defensible position to re-designate Site SAF 18 as Green Belt, given that it meets a number of Green Belt functions, and in turn remove the Oxspring Fields site from the Green Belt and allocate it for housing development. The key reasons being as follows:-

- Local residents and Oxspring Parish Council have historically objected to the development of Site SAF18 for housing citing highways, drainage and availability issues.
- The UDP identifies that BMBC have the ability to remove as well as re-designate land within the Green Belt.
- The UDP identifies the historical settlement linkages between Penistone and Oxspring, and Oxspring’s capacity to accommodate growth as a result.
- The Draft Barnsley Local Plan identifies the need to release land from the Green Belt to meet the Borough’s housing needs and proposes both safeguarded land designations and employment land allocations in the Parish of Oxspring, which recognises the settlement’s capacity for future development.
- The Green Belt Review, which doesn’t include a full assessment of Site SAF18, identifies that the retention of Site SAF18 as Safeguarded Land would weaken the integrity of the Green Belt on account of a lack of defensible boundaries and openness of the area immediately surrounding the site. A position that is entirely the opposite to that of our client’s proposed development at Oxspring Fields.
- The SHLAA identifies Site SAF18 as a Category 2 housing site on account of identified deliverability issues, including impact on landscape character. The Oxspring Fields site is identified

as a Category 1 'deliverable' housing site due to there being no suitability, availability and achievability concerns.

- Further assessment work undertaken by YLL's Landscape Consultants have identified that the Oxspring Fields development proposals perform better than Site SAF18 against a number of environmental concerns including the historic settlement pattern, landscape character and ecology.
- Further assessment work undertaken by YLL's Landscape Consultants have identified that that Site SAF18 fulfils identified purposes of Green Belt. Whereas the development of the Oxspring Fields proposals would not and could also strengthen the Green Belt in the surrounding area of the site and settlement.

We respectfully request that you and your officers review the content of this letter in the preparation of the next edition of the Barnsley Local Plan.

Yours sincerely,



PAUL BUTLER
Director

Cc

David Shepherd, Service Director for Head of Economic Regeneration, Barnsley Metropolitan Borough Council, Westgate Plaza, PO Box 604, Barnsley, S70 9FE

Joe Jenkinson, Head of Planning & Building Control, Economic Regeneration Service, Barnsley Metropolitan Borough Council, Westgate Plaza, PO Box 604, Barnsley, S70 9FE

APPENDICES

- A.** Annotated Aerial Photographs of Site SAF18
- B.** Annotated Aerial Photographs Identifying the boundaries of Barnsley Green Belt Review Areas PEN2 & PEN11
- C.** Smeeden Foreman Landscape Statement (May 2014)
- D.** BMBC's Draft Local Plan proposal map 51 superimposed with the Proposed Oxspring Fields Layout Plan.
- E.** Smeeden Foreman Response to the Barnsley Green Belt Review dated 23rd December 2014