

Inspector Housden
c/o Mr Richard Gilbert
Local Plan Programme Officer
Forwarded via Planning Policy Team
Economic Regeneration
Barnsley Metropolitan Borough Council
PO Box 634
Barnsley S70 9GG

14th March 2018

Dear Inspector Housden,

EMPLOYMENT & HOUSING NEEDS OF PENISTONE & THE WESTERN VILLAGES – ARUP GREEN BELT REVIEW CONCERNS

We write on behalf of our client Yorkshire Land Limited in respect of Stage 4 of the Barnsley Local Plan Examination in Public. We apologise for writing to you at this juncture, however, whilst preparing our Stage 4 Hearing Statements for Main Matters 16 and 20 we found what we consider to be two very important concerns in respect of the soundness of the ARUP Green Belt Review and with it BMBC's current employment and housing evidence base.

Whilst we appreciate that you will have not had sight of our hearing statements at this point, we thought it prudent to summarise these two concerns now in order to help draw your attention to them when reviewing our statements.

Within our hearing statement to Main Matter 16, we identify in Paragraphs 2.12 to 2.17 that proposed employment site allocation Site Ref. P2 (Sheffield Road, Oxspring) wasn't included within an assessed General Area within the ARUP Green Belt Review. The site is located adjacent to assessed General Area PEN1, but not within it. We believe that this presents a huge issue in respect of the soundness of the proposed allocation of the site on the basis that it has not been properly assessed against the five Green Belt purposes prior to its proposed release from the Green Belt by BMBC.

Furthermore, the ARUP Green Belt Review approach and Method report identifies at paragraph 5.3.2 that following the initial sift of formal national-level statutory designations, General Areas were assessed for three further site-based constraints including Flood Risk, Historic Environment and Topography/Landscape/Visual matters. The aim of this approach was that it would further refine the land which is potentially suitable for release from the Green Belt as a "resultant parcel". Consequently, Site Ref. P2 has not been assessed against these three further site-based constraints prior to its release. Evidence is provided within our statement to justify that even if it had then this assessment would have confirmed that the site cannot be considered deliverable.

Our second point of concern is identified in our hearing statement to Main Matter 20, in association with the proposed housing and safeguarded land allocations Site Ref. EC6 and Site Ref. EC7 at Sheffield Road, Oxspring. Within Paragraphs 3.6 to 3.12 of our statement in association with Site Ref. EC6, we identify that our client's Oxspring Fields site has never been properly tested as a reasonable alternative by BMBC on account of a factual error within the ARUP Green Belt Review.

The ARUP Green Belt Review identifies that General Areas which score 15 out of 25 when assessed against the NPPF's Green Belt purposes should be considered for resultant parcels on account of them being considered to only *moderately fulfil* Green Belt purposes. YLL's Oxspring Fields site (together with the Blackmoor Industrial Complex) is located within parcel PEN11 within the ARUP Green Belt

Review and was not re-assessed for resultant parcels as it was shown to score 16 out of 25 in total against the five Green Belt purposes, as assessed within the Arup Green Belt Review.

However, ARUP's scoring of General Area PEN11 is *incorrect* due to a mis-calculation of the five individual scores. General Area PEN11 was not re-assessed despite actually scoring 15 out of 25. Meaning that the General Area PEN11 is actually only **moderately** fulfilling the purposes of Green Belt. This should have led to the General Area being considered for resultant parcels, which as we know is a potential precursor for the identification of allocations within the Local Plan.

Furthermore, ARUP also incorrectly gave a score of 3 points to the General Area PEN11 in respect of the Fifth purpose of the Green Belt. Whereas in accordance with paragraph 2 on page 21 of ARUP's Green Belt Review Methodology, General Area PEN11 should actually have scored 2 out of 5 for this purpose as the General Area includes a large previously developed site (i.e. the Blackmoor Industrial complex). The impact of correcting this further error would reduce the overall score of the General Area further to 14 out of 25.

On account of these errors, we believe that the failure to re-assess General Area PEN11 for resultant parcels has a significant impact in respect of the soundness of the plan as the Council have failed to appropriately test reasonable alternatives for development around Oxspring.

We therefore believe that the ARUP Green Belt Review needs to be amended to include a re-assessment of Site Ref. P2 and General Area PEN11 in order for the document to be considered a sound and robust evidence base document of the Local Plan.

Again, we apologise for writing to you at this time. However, given the implications of the above evidence in respect of the Stage 4 hearing sessions, we wanted to give you as much advance warning as possible of these concerns.

Yours sincerely,



PAUL BUTLER
Director