

Hearing Statement – Yorkshire Land Limited - Unique Representor Number: 23082

Main Matter 16

Whether or not the proposed reduction in the jobs target is justified and the implications for the plan's economic strategy and employment land requirement?

INTRODUCTION

- 1.1 We write on behalf of our client Yorkshire Land Limited (YLL) to provide their hearing statement to Main Matter 16 of the Barnsley Local Plan Examination in Public.
- 1.2 The comments made in this statement should be considered alongside YLL's representations to the Publication Draft Barnsley Local Plan (PDLP) dated August 2016 and their Hearing Statements for the Barnsley Local Plan EiP with regards to their development proposals entitled the Blackmoor Business Park. Copies of these documents can of course be provided on request or alternatively viewed online at www.blackmoorbusinesspark.co.uk.
- 1.3 YLL believe that the emerging Local Plan distributes insufficient employment land in Penistone and the Western Rural area of the Borough. To further exacerbate this concern, the only current proposed employment site allocation in Penistone (Site Ref. P2) is currently not deliverable.
- 1.4 This statement relates specifically to Issues 16.3 & 16.4 of Main Matter 16. It should be read alongside the response to Issues 16.1 & 16.2 submitted by Peter Brett Associates.
- 1.5 YLL are keen to ensure that a sound Local Plan is delivered and consequently request that the modifications suggested in this statement are considered as Main Modifications to be consulted on prior to the adoption of the Local Plan.

RESPONSE TO ISSUE: -

16.3 What implications would the proposed reduction in the jobs target have for delivering the aims of the Council's 'Jobs and Business Plan' and the plan's aim to increase job density in the Borough?

16.4 Having regard to the proposed reduction in the jobs target, is the amount of employment land proposed to be allocated in Policies E1 and E2 justified (approximately 310 hectares)?

- 2.1 Whilst BMBC have sought to re-evaluate their evidence base in respect of economic development, they have not sought to correct one of the existing anomalies and flaws associated with their previous approach, which is the significant deficiency of proposed new economic growth in Penistone and the Western Rural area of the Borough.
- 2.2 Penistone East and West Wards account for approximately 10% of the Borough's population, however, Policy E2 of the Barnsley Publication Draft Local Plan (PDLP) only seeks to distribute 1% of the Borough's future employment land opportunities to Penistone (3.27ha of a total 309.4ha). All of which is proposed to be allocated at Site Ref. P2 in Oxspring which is not currently deliverable.
- 2.3 Given Penistone's role as the principal service centre for the Western Area of the Borough we believe additional sites need to be allocated in order to ensure that the supply of viable employment land and infrastructure is sufficient to sustain and enhance the economy of the Western Area of the Borough up to the end of the Barnsley Local Plan Period in 2033.

- 2.4 Enclosed with this statement in Appendix A, is evidence from an email exchange between Barnsley Metropolitan Borough Council and the Barnsley Development Agency in respect of a previously identified employment site at Lairds Way, Penistone (Site Ref. P1 which is now in the process of being developed for residential use) which supports the argument in respect of the need to distribute additional employment sites to Penistone on account of the following: -
- From both a labour supply and a labour demand perspective Penistone is seen as being one of the Borough's most economically active parts of the borough, which has seen levels of employment and self-employment continue to increase over the last 10 years and remain higher than Borough wide, Regional and National rates.
 - Penistone West Ward residents have been more resilient and continue to record significantly lower levels of unemployment compared to other parts of the Borough and indeed Regional and National rates.
 - The ability to continue the growth recorded is crucial to helping to ensure that Penistone contributes to the overall Borough wide economic strategy targets.
 - Many "self-employed" are working from home in the Penistone and surrounding areas due to the lack of facilities in the proximity especially for new start and small businesses.
 - Recent demand for appropriate sized units at Marrtree Business Park (3,000 – 4,000 sq.ft) has seen all units on this employment site currently being occupied and let to tenants. The issue now will relate to the provision of additional space to retain these businesses and the delivery of additional employment space for similar businesses that could be attracted to Penistone.
- 2.5 Further to the above, a very recent news article attached at Appendix B, which featured in the Barnsley Chronicle on Friday 23 February 2018 identifies significant demand for new business units in Penistone.
- 2.6 The need to identify additional employment sites in Penistone and the Western Rural area of the Borough is therefore well evidenced. Such evidence exacerbates the concerns associated with the deliverability of Site Ref. P2 in Oxspring given it is currently the only proposed new employment allocation in the area.
- 2.7 In addition, we wish to also point out that since the adoption of the UDP in December 2000, a large amount of employment land in Penistone has been redeveloped for residential purposes. This is attributable to a number of reasons: -
- Poor/restricted HGV Access in the Town;
 - The Introduction of PPG3, encouraging housing developments on previously developed sites; and
 - The Councils adoption of Planning Advice Note (PAN) 30, similarly encouraging housing development on previously developed sites.
- 2.8 The result of these factors is that housing has increased to the detriment of employment land, and we therefore believe this necessitates the allocation of a further employment site which can meet the needs of the Penistone and Western Rural Area during the Local Plan period.
- 2.9 Notwithstanding the above, unless changes are made to the PDLP we believe there will be no new employment land delivered within Penistone and the Western Rural area of the Borough over the entire Plan Period. This is on account of the well-evidenced deliverability concerns

associated with the only current proposed employment allocation in Penistone, Site Ref. P2 Sheffield Road, Oxspring.

- 2.10 Despite the comments we made at the previous hearing sessions, there is still currently only one proposed employment land allocation to meet the employment needs of Penistone and the Western Rural Area over the whole of the PDLP plan period. However, Site Ref. P2 cannot currently be justified as a deliverable employment land allocation.
- 2.11 In addition, we have previously argued that insufficient evidence has been provided to demonstrate that the site's selection is soundly based and indeed why it has been considered preferential to our client's Blackmoor Business Park site, which we consider to be a deliverable employment site located on previously developed land. Please see the Aerial photograph, attached at Appendix C.
- 2.12 A further review of the background evidence associated with the proposed release of **Site Ref. P2** is the fact that it **wasn't included within an assessed General Area within the ARUP Green Belt Review**. The site is located adjacent to assessed General Area PEN1.
- 2.13 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.
- 2.14 The fact that it hasn't been assessed within a General Area means that it has also not been identified within a "resultant parcel". Which is a precursor to a site's release from the Green Belt within the Local Plan.
- 2.15 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".
- 2.16 Consequently, Site Ref. P2 has not been assessed against these three further site-based constraints prior to its release. Evidence is provided within this statement to justify that even if it had then this assessment would have confirmed that the site cannot be considered deliverable.
- 2.17 Notwithstanding this point, it is clear that the ARUP Green Belt Review needs to be amended to include a re-assessment of Site Ref. P2 in order for the document to be considered a sound and robust evidence base document of the Local Plan.
- 2.18 With regards to the deliverability of Site Ref. P2, there are a number of factors which will affect the scale of development at the site, including the presence of two large electric pylons carrying high voltage cables which hang low over the site. Policy P2 of the PDLP identifies the delivery constraints associated with the electricity pylons, alongside several other constraints including:
 - Mature trees on the site's north-eastern boundary contained within Spring Vale Wood;
 - Provision of a buffer strip;
 - Potential archaeological remains; and
 - the listed Kirkwood Farmhouse located within 100m of the site.
- 2.19 We also believe that the field shape, topography and contours of the site will be an additional constraint to the development of the site. When the above site-specific constraints are considered comprehensively, we believe that this would reduce the net developable area considerably. Potentially rendering the site's development as unviable. We are still not aware

of any developer or promoter interest in Site Ref. P2 who can provide evidence of the site's deliverability for employment use, over four years since the site's initial allocation as a draft employment site.

- 2.20 In addition to the above, we are also aware of one other key restriction associated with the development of Site Ref.P2 related to the accessibility for high sided delivery vehicles. Penistone is restricted by a number of low bridges including those located on Bridge Street, Green Road and at Sheffield Road in Oxspring which have height limits ranging between 10 feet 9 inches to 14 feet 9 inches. Site P2 is situated between these low bridges and this is a major complication for any business considering business premises in the area. Please see the photographs enclosed at Appendix D.
- 2.21 Furthermore, an increase in commercial vehicular traffic through the centre of Penistone, as the only potential route available to HGV's to reach the proposed employment land site Ref. P2, would be detrimental to the Town. BMBC recognise the issue of low bridges in and around the vicinity of Penistone, having published the 'Penistone Hauliers Guide – Routes Avoiding Low Bridges'. Please see the document enclosed at Appendix E.
- 2.22 There are therefore serious implications associated with the deliverability of proposed employment site allocation Ref. P2, leading to serious implications associated with the ability of the PDLP to meet the employment needs of Penistone and the wider rural hinterland which it serves.
- 2.23 Consequently, given Penistone's role as the principal service centre for the Western Area of the Borough (which geographically makes up over half of all land in the Borough) we believe additional sites need to be allocated in order to ensure that the supply of viable employment land and infrastructure is sufficient to sustain and enhance the economy of the Western Area of the Borough up to the end of the Barnsley Local Plan Period in 2033.
- 2.24 Site Ref. P2, by BMBC's own admission at the previous hearing sessions, is a poorly performing site which is unlikely to come forward until at least 10 years into the plan period. Furthermore, it was also identified by BMBC at the hearing sessions that the decision to choose only one allocation to meet the employment needs of the Penistone area on account of a lack of suitable sites. Which is clearly not the case.
- 2.25 It is our view that the Blackmoor Business Park site out performs Site Ref. P2 across a number of sustainability and deliverability considerations. Evidence of this is presented in our scoring of the Blackmoor Business Park site against the Council's criteria for the assessment of proposed employment sites (enclosed in Appendix F). A score which totals **88**. Compared to BMBC's score of **86** for Site Ref. P2.
- 2.26 Following a further detailed review of BMBC's scoring of Site Ref. P2 we have identified some clear errors. Accordingly, we have undertaken our own assessment of the site against BMBC's scoring criteria. Our scoring of the site totalled **70** (enclosed in Appendix G).
- 2.27 Our assessment results provide a far more accurate representation of the clear differences in sustainability and deliverability between the two sites. The Blackmoor Business Park represents an unconstrained, viable, previously developed site which is being promoted for development by a developer with a track record of delivering employment development within the area. Whereas Site Ref. P2 represents a physically constrained, unviable, greenfield site located within the Green Belt which has generated no developer interest in over four years since it has been identified as a draft employment allocation.
- 2.28 The evidence is substantially weighted in favour of allocating the Blackmoor Business Park site in place of, or in addition to, Site Ref. P2.

- 2.29 We are not aware of any other current employment land allocations or employment sites having been proposed in the Penistone area capable of meeting the area's identified needs. The proposed Blackmoor Business Park represents the only site which has the available infrastructure, satisfactory topography and which is large enough to accommodate the current and future employment needs of the Principal Town of Penistone and the Western Rural Area.
- 2.30 The site is situated in close proximity to three of the largest villages identified within the UDP as 'selected villages', these are Oxspring (0.34 Miles approximately), Thurgoland (0.8 Miles approximately) and Silkstone Common (1.84 Miles approximately).
- 2.31 It can be considered that the reduction in employment land allocations to meet the needs of Penistone and the surrounding Western Area of the Borough between the Core Strategy/Sites and Places DPD and the PDLP is associated with the lack of available, deliverable, employment land within the area, rather than a reduction in employment needs overall.
- 2.32 YLL are proposing to deliver high quality B1 & B2 employment facilities at the Blackmoor Business Park, a former petroleum storage and distribution site located to the south of Sheffield Road, Oxspring. The site extends to approximately 10.1 Hectares (25 acres) and was initially constructed in the mid 1950's by the Ministry of Defence (MoD) as a component of its Petroleum Storage and Distribution Network. It was then used privately from the 1970's until 1997 by 'ConocoPhillips' and 'Murco' for the distribution of fuel utilising a fleet of large petroleum tankers.
- 2.33 The Aerial Photograph enclosed in Appendix C provides clear evidence of the site's previously developed nature. The photograph identifies that the site contains redundant buildings, hardstanding and brick petroleum storage tanks covered by turf, which provide a clear anomaly in the local landscape character of the area.
- 2.34 Presently the land is owned by the MoD. The Inspector will recall that we wrote to her by letter dated 23rd January 2018 to forward a letter from YLL's solicitors, Gateley PLC dated 20th January 2018, which confirmed that the MoD have now appointed agents GVA Grimley to market the property for sale as early as Spring 2018 (the letters are enclosed in Appendix H).
- 2.35 Whilst the site represents a previously developed site which could be brought forward early on account of current national and local planning policy, we believe that it would be beneficial to all parties who may be interested in acquiring the Blackmoor Business Park site to have further certainty of its planning status through the site's allocation within the Barnsley Local Plan.
- 2.36 The allocation of the site for employment purposes will act as a catalyst to enhance the prospect of the site's development in the future and the development of the site would deliver substantial benefits to the Borough through the delivery of a high-quality employment site; situated in a sustainable location; by a regional developer with a successful track record in redeveloping previously developed sites.
- 2.37 YLL's proposed Blackmoor Business Park development can be considered a more deliverable employment land allocation than Site Ref. P2 on account of a combination of the following: -
- Proposed employment Site Ref. P2 is a Greenfield site located within the Green Belt. Unlike the proposed 'Blackmoor Business Park' which is categorised as a previously developed site, albeit within the Green Belt.
 - The site benefits from the presence of strong defensible landscape belts located on the northern, eastern and southern boundaries. These features would be retained and enhanced where possible.

- Whilst the site's allocation would "technically" increase the amount of land released from the Green Belt, it would not involve the release of land that meets the identified purposes of the Green Belt on account of it being previously developed.
- The site is located within a sustainable location and there are no technical constraints that would preclude the development of the site.
- The site is easily accessible to public transport with an existing bus stop located immediately adjacent to the site's entrance on Sheffield Road. There are direct local bus services to Penistone, Barnsley and Sheffield (which route via Oxspring, Thurgoland and Silkstone Common) and the nearest rail station is only a couple of miles away at Penistone, with direct, hourly services to Huddersfield, Barnsley and Sheffield.
- The site is located within close proximity of the settlements of Penistone and Barnsley and within commuting distance of Sheffield, Wakefield, Leeds and Manchester (all within 30 miles).
- The Trans Pennine Trail forms the sites South Western boundary, and this provides access to and from Penistone for those on foot or cycle. It would take approximately 10 minutes to cycle from the centre of Penistone to the proposed Business Park on a safe, flat and dedicated route segregated from motor vehicles. The Trans Pennine Trail also passes by Penistone Railway Station, where there are direct links to the Station platform.
- The site's location on the eastern edge of Oxspring adjoining the B6462 'Sheffield Road' (close to the A629) would mean that work-related trips to and from places such as Barnsley, Sheffield, Leeds and Huddersfield can access the wider highway network (including the M1 Motorway) without the need to utilise narrow country lanes or travel directly through much of Oxspring or Penistone. Thus, helping to reduce the level of congestion currently witnessed on a daily basis in Penistone.
- With regards to technical matters, as the site is previously developed it is already served by mains services, including foul and surface water drainage. In terms of drainage infrastructure, both foul and surface water outfalls can be adequately accommodated, as the site is located adjacent Penistone's Waste Water Treatment works and the River Don. As can be seen on the photograph at Appendix C.
- There are no vehicular access restrictions, including restrictions associated with low bridges, as referenced above in respect of site Ref. P2.
- The site will be designed sympathetically to ensure that any existing features of environmental value are protected or enhanced where possible.
- The development of the site will also include the remediation of any areas of contamination caused by the site's former use.
- The site is highly accessible to a large number of future employees and employers. It can importantly provide new employment opportunities to help sustain the proposed housing growth of Penistone.
- The NPPF identifies that allocations of land for development should prefer land of lesser environmental value and encourage the effective use of land by reusing land that has been

previously developed. Guidance that can be used to argue that the site is more preferable than Site Ref. P2 when considered against national planning policy.

- The NPPF promotes the creation of employment opportunities in rural areas, identifying the desire for Local Plans to promote a strong rural economy through supporting the sustainable growth and expansion of all types of business and enterprise in rural areas, both through conversion of existing buildings and well-designed new buildings.
- In relation to the site's location within the Green Belt, the NPPF identifies that the complete redevelopment of previously developed sites, whether redundant or in continuing use, is not considered to be inappropriate development within the Green Belt where it would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development.

2.38 The development of the Blackmoor Business Park would be entirely in accordance with Proposed Local Plan Policy E8 as it would: -

- Encourage a viable rural economy;
- Improve the range and quality of local services in existing settlements;
- Include the re-use of existing rural buildings in the first instance; &
- Not have a harmful impact on the countryside, biodiversity, Green Belt, landscape or local character of the area.

2.39 With regards to BMBC's desire to improve the range and quality of local services available to rural communities, the allocation of the Blackmoor Business Park is especially needed following the Inspector's requirement to allocate housing sites within Villages. The provision of additional employment allocations, which are sustainably linked to those Villages which are due to receive housing allocations, is vitally important to ensure their long-term sustainable growth.

2.40 As identified above, the Blackmoor Business Park is located within walking and cycling distance from Oxspring, Thurgoland and Huthwaite. Oxspring and Thurgoland are both due to receive new housing allocations. The site's allocation would provide a catalyst to deliver a high quality rural business park and the provision of much needed additional employment opportunities for a number of Villages located within the Western Rural area of the Borough.

2.41 The type of business park being proposed by YLL is similar to those which have been successful in similar locations which are rural in nature yet located within close proximity to Principal Town's and Villages. Examples of such sites include: -

- Escrick Business Park, Selby – High Quality B1 & B2 Class Units - Located south of Escrick Village but within proximity of Selby and York;
- Newby Stables, Newby Hall, Ripon - High Quality B1 & B2 Class Units - Located within the grounds of Newby Hall at a distance of 7 miles from Ripon.
- Broughton Hall Business Park, Broughton Hall - High Quality B1 & B2 Class Units - Located within the grounds of Broughton Hall at a distance of 4 miles of Skipton.
- Sheriff Hutton Industrial Park, Ryedale – B1 & B2 Class Units – Located south of Sheriff Hutton Village and serving a number of other local Villages.

- Green Centre Business Park, Sutton on the Forest, Hambleton – B2 Class Units – Located south of Sutton on the Forest, located within 6 miles of York and serving a number of other local Villages.
 - The Craggs Country Business Parks, Sowerby Bridge – B1 & B2 Class Units – Located within a rural setting but within 4 miles of Sowerby Bridge.
 - Kirkby Mills Employment Park, Ryedale – B1, B2 & B8 Class Units – Located within a rural setting but within 1 mile of Kirkbymoorside, 7 miles of Pickering and Helmsley.
- 2.42 Each of the above business parks provide employment opportunities for the rural areas within which they are located. Their location and size are appropriate for the character of the surrounding area. Each of these sites plays an important role in the sustainability of the settlements which surround them. Similar to that which the Blackmoor Business Park can provide.
- 2.43 Importantly, the revised Draft NPPF that is currently out for consultation would strengthen the argument we are making here (if adopted as worded) where is identities in Paragraph 85 that:
- “Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found outside existing settlements, and in locations that are not well served by public transport. In these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport). The use of previously developed land and sites that are well-related to existing settlements should be encouraged where suitable opportunities exist.”*
- 2.44 The development of the Blackmoor Business Park would exceed the requirements of this guidance on the grounds that it is well served by public transport and accessible on foot and by cycle from the Trans Pennine Trail; it would not have an unacceptable impact on local roads; and would re-use a previously developed site.
- 2.45 Finally, there is an important factual error within the ARUP Green Belt Review which we believe has played an important contribution to BMBC’s decision to not allocate the Blackmoor Business Park site.
- 2.46 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 as a resultant parcels on account of them being considered to only *moderately fulfil* Green Belt purposes. General Areas which score 16 out of 25 or more are not taken forward as resultant parcels as they are considered to *strongly fulfil* Green Belt purposes.
- 2.47 The Blackmoor Business Park is located within General Area PEN11 within the ARUP Green Belt Review. BMBC have confirmed in an email exchange dated 21st February 2018 (enclosed) that General Area PEN11 was not re-assessed for resultant parcels due to it scoring 16 out of 25 in the Arup Green Belt Review.
- 2.48 ARUP’s scoring of parcel PEN11 is however **incorrect due to a mis-calculation of the five individual scores**. These scores were: -
- GB Purpose 1 = 4 out of 5
 - GB Purpose 2 = 3 out of 5
 - GB Purpose 3 = 3 out of 5
 - GB Purpose 4 = 2 out of 5

GB Purpose 5 = 3 out of 5

TOTAL = 15 out of 25

- 2.49 General Area PEN11 was not re-assessed despite actually scoring 15 out of 25, rather than the 16 out of 25 as shown Arup Green Belt Review Document. Which means that the General Area is actually only **moderately** fulfilling the purposes of Green Belt rather than strongly fulfilling those purposes as identified in the Arup Green Belt Review document.
- 2.50 ARUP have also incorrectly given a score of 3 points to the parcel in respect of the Fifth purpose of the Green Belt. In accordance with ARUP's Green Belt Review Methodology, General Area PEN11 should actually have scored 2 out of 5 for this purpose as the parcel 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.
- 2.51 On account of these two **vital** errors, we believe that the failure to re-assess General Area PEN11 as a resultant parcel has a significant impact in respect of the soundness of the plan as the Council have failed to appropriately test reasonable alternatives for development to meet needs in Oxspring.
- 2.52 General Area PEN11 was not reassessed as a result of incorrect scoring. If it had been, the evidence indicates that YLL's proposed Blackmoor Business Park site would have been identified as being located within a resultant parcel as ARUP's assessment for General Area PEN11 confirms that the *"the Trans Pennine Trail could form a strong internal boundary to the Green Belt in PEN11 should the area be considered for subdivision and that the land in the east of the General Area (i.e. the location of the Blackmoor Industrial Complex) is less open with a reduced rural character"*.
- 2.53 The correct assessment of General Area PEN11 would thus have led to identification of the Blackmoor Business Park site to be assessed for development on account of its location with a resultant parcel. When combined with the evidence presented within this hearing statement and our previous submissions, we believe that this factor would have led BMBC to take a different decision in relation to the potential allocation of the site.
- 2.54 On account of the evidence provided above, we believe that BMBC's site selection process for the employment allocations in Penistone and the Western Rural area of the Borough is not soundly based. If it was then YLL's proposed Blackmoor Business Park site would have been identified as an employment land allocation as it is a preferable site to proposed allocation Site Ref. P2 when measured across a wide spectrum of sustainability and deliverability criteria.
- 2.55 Whilst BMBC have sought to re-evaluate their evidence base in respect of economic development, they have not sought to correct one of the existing anomalies and flaws associated with their previous approach, which is the significant deficiency of proposed new economic growth in Penistone and the Western Rural area of the Borough, particularly considering the Area's identified economic strength and resilience.
- 2.56 BMBC have again ignored the opportunity to allocate the Blackmoor Business Park for employment development. We therefore respectfully request that the Inspector recommends the allocation of the site to BMBC on the planning grounds articulated within this statement and our previous submissions as part of the Local Plan process.

PROPOSED MODIFICATION

- 3.1 On account of the above, we request that Policy E2 of the PDLP be amended to increase the distribution of proposed employment land allocations to Penistone from 3.3ha (1%) to circa 13.4ha (4.3%) in order to enable the allocation of YLL's Blackmoor Business Park development proposals.
- 3.2 The evidence provided in this statement presents an accurate representation of the clear differences in sustainability and deliverability between the two sites. The Blackmoor Business Park represents an unconstrained, viable, previously developed site which is being promoted for development by a developer with a track record of delivering employment uses within the area. Whereas Site Ref. P2 represents a physically constrained, unviable, greenfield site located within the Green Belt which has generated no developer interest in over four years since it has been identified as a draft employment allocation.
- 3.3 The evidence is substantially weighted in favour of allocating the Blackmoor Business Park site in place of, or in addition to, Site Ref. P2.
- 3.4 The PDLP's supporting evidence states that 170ha of land is to be removed from the Green Belt to deliver the Borough's employment land needs. Whilst the allocation of the Blackmoor Business Park would "technically" increase this figure (whether in addition to or to replace Site Ref. P2) it would not involve the release of land that meets the identified purposes of the Green Belt on account of it being previously developed.

APPENDIX A

From: Smith , Matthew
Sent: 09 August 2013 16:04
To: Dunn , Keiron
Subject: FW: Penistone

Keiron,

More info to help with Lairds Way report.

Matthew

Matthew Smith
Group Leader (Outer Team)
Development Management
Barnsley MBC
Planning and Transportation

From: Johnson , Paul
Sent: 15 July 2013 13:16
To: Smith , Matthew
Subject: RE: Penistone

Matthew

Many thanks for your email

In relation to your questions hopefully the following should help

Census Labour Supply Data

According to the 2011 Census the Penistone West ward (incorporates main urban centre of Pensitone, Thurlstone and Hoylandswiane) recorded;

- 11,322 residents of which 65.2% are classed as being of working age (16- Pensionable Age)
- Penistone West's working age population rate (65.2%) is greater than the rates recorded at borough (64.1%), regional (64.6%) and national (62.5%) rates – helping to indicate a potential greater demand for potential employment sites to service the indigenous population base.
- 73% of Penistone West's resident based population (16-74) are classed as being economically active, which is greater than the rates recorded at borough (66.5%), regional (68.4%) and national (69.9%) rates
- Of those who were economically active in Pensitoen West;
 - 67.5% were in employment, which is greater than the rates recorded at borough (59.1%), regional (60.0%) and national (62.1%) rates
 - 10.8% were in self employment, which is greater than the rates recorded at borough (7.7%), regional (8.4%) and national (9.8%) rates
 - 3.0 % were unemployed, which is lower than the rates recorded at borough (5.1%), regional (4.8%) and national (4.4%) rates
- Over the last 10 years (since the last Census the following characteristic's have occurred within the Penistone West ward:
 - Employment levels have increased (65.0% in 2001 to 67.5% in 2011)

- Self employment levels has increased (9.9% in 2001 to 10.8% in 2011)
- Unemployment levels has increased (2.3% in 2001 to 3% in 2011)

Unfortunately, Census 2011 data has not released travel to work statistics for lower levels of geographies, therefore we are unable to provide a response to this question , however Census 2001 indicated that residents who lived in Pensistone West ward:

- 29.4% worked less than 2K form where they lived (lower than the rates recorded at borough (28.1%), regional (29.1%) and national (29.1%) rates
- 50.8% worked less than 10K form where they lived (lower than the rates recorded at borough (66.6%), regional (71.4%) and national (67.5%) rates

Labour Demand Data

According to ONS Business Register & Employment Survey (BRES) data there are;

- 3,073 total employee jobs are held by businesses within the Penistone West Ward, of which:
 - 68.6% are classified as being full time and 31.4% are part time classified
- In terms of the industrial breakdown of jobs in the Penistone West Ward;
 - 25.7% are Manufacturing based
 - 17% are Retail based
 - 8% are Transport and Storage based
- **Over the past year;**
 - the number of jobs in the Penistone West ward has increased by 0.3%, with Full time Employment (FTE's) jobs increasing by 1.3% (lower than the 2.8% increase recorded at Barnsley level)
 - Transport and Storage sector recording the largest increase in jobs that have been created (+142 increase of 135%)
- Despite the increase recorded over the last year, the number of employee jobs in Penistone West ward remains -6.1% lower than before the last recession (2008).

In addition to the above, Bank start data (new business bank accounts) continues to record the Penistone West and East wards as being one of the top 3 wards within Barnsley for the creation of new businesses.

Conclusion

- The above evidence from both a labour supply and also to that of a labour demand perspective help to indicate that the Penistone West Ward is seen as being one of the boroughs most economically active part of the borough, which has seen levels of employment and self employment continue to increase over the last 10 years and remain higher than borough wide, regional and national rates.
- Likewise Penistone West Ward residents have been more resilient and continue to record significantly lower levels of unemployment compared to other parts of the borough and indeed regional and national rates.
- Residents of the borough are more likely to out commute to work (outside Penistone), mostly associated to more constrained workplace pay that both Penistone and Barnsley as a borough commands.
- Job growth has occurred, during the last few challenging years from largely the growth of the indigenous business stock and also the expansion and relocation of companies to new employment sites.

- The ability to continue the growth recorded over the past year is crucial to helping to ensure that Penistone West ward contributes to the overall borough wide economic strategy targets (need for up to 32,000 jobs being to be created and the growth of the indigenous businesses base by 1,500 new businesses)
- Loss of key employment land to other uses (most notably housing) could potentially hamper the future and continued growth of both the overall business base and future jobs within the Penistone part of the borough. Thus meaning that the borough is unable to meet its core economic strategy targets; a reduction in potential business rates for BMBC and the potential out commuting of businesses and loss of additional private sector jobs if a range of future land and premises does not remain.
- For instance many “self-employed” are working from home in the Penistone and surrounding areas due to the lack of facilities in the proximity especially for new start and small businesses. Starter units and test bed area would do well.
- Likewise recent demand for appropriate sized units at Martree Business Park (3,000 – 4,000 sqft) has seen all units on this employment site currently being occupied and let to tenants, issue now will be for additional grow on space to remain these businesses and additional employment space for similar businesses that could be attracted to Penistone.

Hope this helps ,however if you require any additional information please do not hesitate to let me know

Regards

Paul Johnson
Connect Barnsley Manager
Barnsley Development Agency

From: Smith , Matthew
Sent: 11 July 2013 13:44
To: Johnson , Paul
Subject: Penistone

To Paul,

I've been informed you may be able to help me out with some background information on the current and future economic potential of Penistone.

I am currently dealing with a planning application for residential development on a site in Penistone which is designated for employment use. The applicants are arguing that the site is not required for employment purposes but in order to understand whether it is needed or not it would be useful to know how the labour market acts in Penistone. With this in mind, have you got any information which might answer the following:

- What is the percentage of residents who live and work in Penistone?
- Has the trend over the last 10 years been for residents to work outside of Penistone?
- Do you know if there is a great need for employment provision within Penistone>?

Any information you can provide on the above would be appreciated.

Matthew

Matthew Smith
Group Leader (Outer Team)
Development Management
Barnsley MBC
Planning and Transportation

APPENDIX B



OPEN FOR BUSINESS: Paul Fearn outside one of the new units.

Units open in Penistone

BUSINESSES are queuing up to move into new industrial units in Penistone.

Penistone Paper and Board is using a grant of around £190,000 to part-fund building five new units on disused land off Sheffield Road.

The company has already created 13 units on the site, which have been snapped up by businesses.

Paul Fearn, co-director of Penistone Paper and Board, said: "We are literally getting asked all the time if we have any space. It's mainly local people who want to work locally."

"If you go to Barnsley or go half an hour up the road you can probably find units, but people want to work nearer to home."

"And by offering them workspace nearer home we are also doing our bit to cut carbon emissions."

The new units, and the existing ones, have all been part-funded by Section 106 money, which is paid by large developers in the area as part of planning permission to support the local economy.

The money was gained with help from Enterprising Barnsley, which aims to help businesses develop and expand; generating economic growth and creating jobs.

Andy Arnold, of Enterprising

Barnsley, said: "This is a really good example of the public sector helping the private sector. Basically what we do is work behind the scenes to help create jobs in the borough."

The first five units were created five years ago and let immediately. A further five were also snapped up and the company then built three on top of the original five.

The diverse range of businesses in the existing units include a specialist bicycle manufacturer, a tree surgeon, plasterers, a craft paper company and a furniture dealer.

The new units will be about 500 square foot each and will be ready in the summer. Paul said as well as creating space for light industry, the units had created another income stream for the company.

"There has been no growth in the paper market because of the recession, so diversifying into renting out space is a very useful source of income for us," he said.

Penistone Paper and Board take unwanted or damaged cardboard and industrial-sized rolls of paper and turn them into useable board and sheets of paper for everything from fast-food containers and toothpaste tubes to writing paper for schools.

APPENDIX C



**BARNSELY LOCAL PLAN
PROPOSED EMPLOYMENT SITE REFERENCE P2**

OXSPRING

PROPOSED 'BLACKMOOR BUSINESS PARK'

APPENDIX D



Sheffield Rd



Sheffield Rd

APPENDIX E

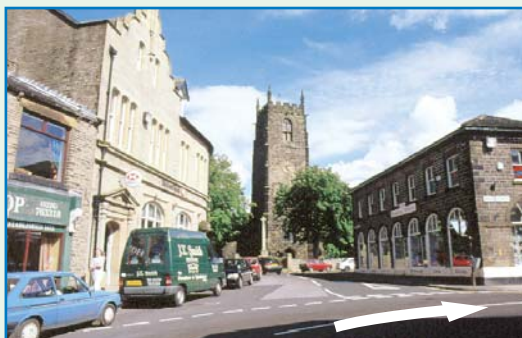
LOCAL HGV TRAFFIC THROUGH PENISTONE TOWN CENTRE

■■■■ on map overleaf
(collections/deliveries in Penistone, Springvale
and Green Road)



From A628 Bridge traffic lights

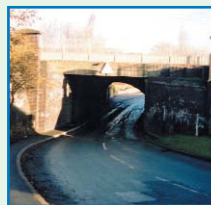
- under 14'9" bridge bear left
- bear right in town centre - Market Street
*do not carry straight on or turn left into
Church Street which is narrow
and one-way*



- **For Springvale** turn left 50 metres by chip shop
into Shrewsbury Road, then under 2 arch
bridges 16'0" and 14'9"



- **For Green Road** carry
on High Street turn left
400 metres to Green Road
- BEWARE of 10'9" hidden
arch bridge at end of
Green Road, Springvale



Springvale from A629

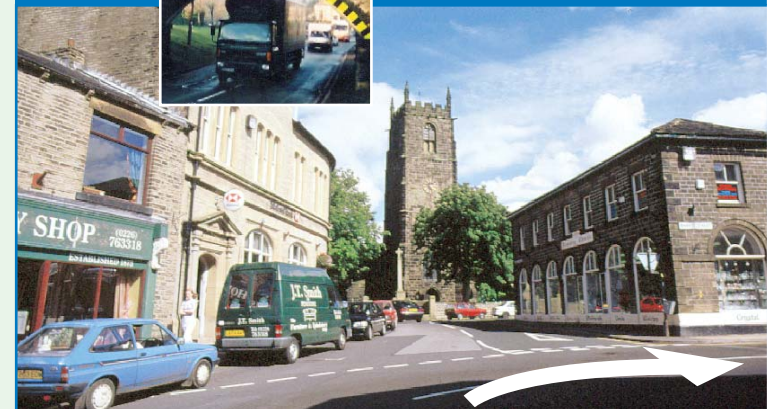
- Turn right in Oxspring onto B6462 - 30 mph
- 13'3" max rail bridge at end of village
- do not use for access to Green Road - 10'9"
hidden arch bridge



JANUARY 2004

Penistone Hauliers Guide

Routes avoiding low bridges



Emergency Contact Nos

Railtrack 01904 525895
SY Police 01142 202020
BMBC Highways 01226 773555



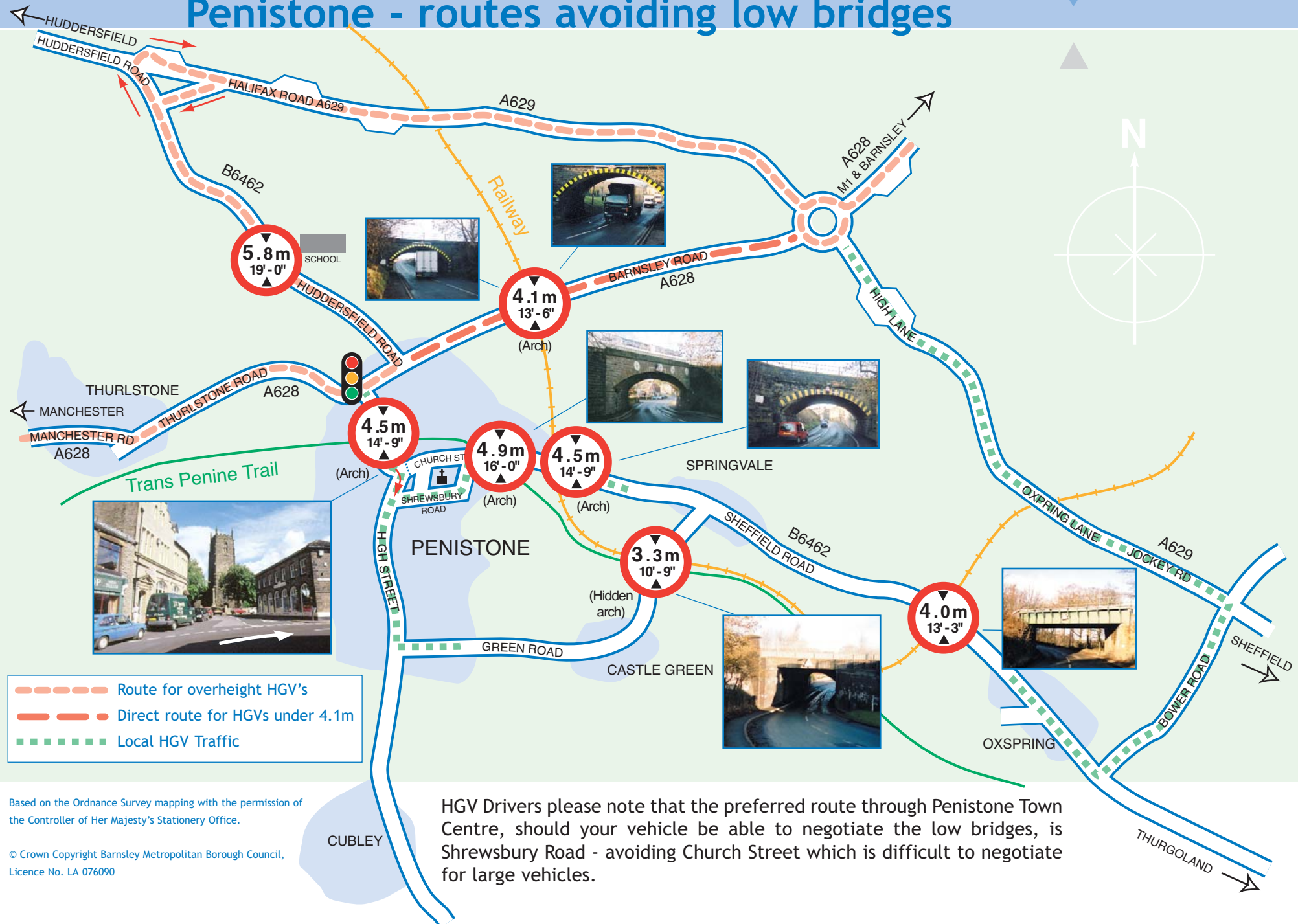
BARNSELY
Metropolitan Borough Council

Produced by BMBC Highways Service 01226 773555
with grant aid from the Leader+ programme



BARNSELY
Metropolitan Borough Council

Penistone - routes avoiding low bridges



Based on the Ordnance Survey mapping with the permission of the Controller of Her Majesty's Stationery Office.

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APPENDIX F

Blackmoor Business Park - PBP Scoring Against BMBC Employment Site Criteria

INDICATOR	DEFINITIONS	SCORE	N6 Former Petroleum Storage Facility, Off Sheffield Road, Nr Oxpsring	PBP Scoring Synopsis
MEETING EMPLOYMENT NEEDS				
Potential to meet local employment needs	Site is within an area of above average deprivation	5		Site located within Penistone & Rural Hinterland Area.
	Site is within an area of average deprivation	3		
	Site is within an area of below average deprivation	1	1	
	Site has potential to provide local jobs in an area of above average employment need	5		Well evidenced need for new employment growth in Penistone & Rural Hinterland Area.
	Site has potential to provide local jobs in an area of average employment need	3	3	
	Site has potential to provide local jobs in an area of lower than average employment need	1		
Potential to meet wider employment needs	Site has potential to make a significant contribution towards the boroughs long term employment needs and stimulate further investment	5		Well evidenced need for new employment growth in Penistone & Rural Hinterland Area. No other potential site to meet this need.
	Site has potential to make a contribution towards the boroughs long term employment needs and stimulate further investment	3	3	
	Site has limited potential to contribute towards the boroughs long term employment needs and stimulate further investment	1		
ACCESSIBILITY				
Accessibility for employees	Site is within 800m of a Railway station	5		Site is not within wa king distance but the Trans Pennine Trail will provide a dedicated cycle route within 10 mins of Penistone train station.
	Site is within 1500m of a Railway station	3		
	Site is not within walking distance of a railway station	1	1	
	Site is within high frequency bus corridor	5		Site's entrance located adjacent to an existing bus stop. Discussions with SYPTE to take place to increase frequency.
	Site is within bus corridor with medium service frequency	3	3	
	Site is not within a bus corridor or limited service frequency	1		
	Site is within walking distance of large population centres and/or is served by dedicated cycle links	5	5	Trans Pennine Trail will provide a dedicated cycle route within 10 mins of Penistone train station.
	Site is within walking distance of smaller population centres and/or is served by dedicated cycle links	3		
	Site has limited potential for walking and cycling from population centres	1		
	Committed public transport improvements within transport corridor	5		No such measures would be needed to enhance the deliverability of the site
	Potential for public transport improvements under investigation	3		
	No identified opportunities and none under investigation	1	1	
	Site could supply local jobs within an area of significant net out commuting	5		Well evidenced need for new employment growth in Penistone & Rural Hinterland Area. No other potential site to meet this need
	Site has potential to supply local jobs within an area of lower out commuting/or may not lead to a net overall decrease in commuting	3	3	
	Site could increase net in commuting into the Borough	1		
Accessibility for business needs	Site is in close proximity and/or has good access to an M1 or A1 junction	5		Access to the M1 is only a 10-minute drive time from the site. Trips would be made along existing A class and B class roads. Site is closer than P2 to the strategic road network and has no highways constraints such as low bridges
	Site is in reasonable proximity and/or has reasonable access to an M1 or A1 junction	3	3	
	Site is in poor proximity and/or has poor access to an M1 or A1 junction	1		
	Site has direct access to a high quality principal road network	5		Access to the M1 is only a 10-minute drive time from the site. Trips would be made along existing A class and B class roads. Site is closer than P2 to the strategic road network and has no highways constraints such as low bridges
	Site has no direct access to, but is in close proximity to principal road network	3	3	
	Site has limited or difficult access to the principal road network.	1		
	Road improvement scheme with committed or provisional funding	5		No such measures would be needed to enhance the deliverability of the site
	Road improvement scheme under investigation	3		
	No committed schemes or improvements under investigation	1	1	
	Rail freight access already provided	5		Site located within close proximity to Penistone Train Station but does not offer direct rail freight access
	Potential for rail freight access under investigation or been safeguarded	3		
	No potential for rail freight access	1	1	
DELIVERABILITY				
Market attractiveness	Identified market interest in the site	5	5	Yorkshire Land Limited have a 30-year track record of delivering previously developed sites in the Penistone area and are willing to invest £15m into the development of the site following its disposal by the MoD
	Number of serious enquiries into availability received	3		
	No identified market interest and limited or no enquiries received	1		
	Site is located within an area that is already attractive to the market	5		Though the area is very attractive to the market and a willing developer of the site has already been identified, we have scored the site as a "3" in comparison to other sites within the Borough
	Site is within an area with reasonable market interest or potential for future interest with further development/intervention	3	3	
	Site is within an area of limited or no market interest	1		
	Limited employment site provision within surrounding area	5	5	There is only one current proposed employment allocation in Penistone (Ref. P2) to serve the town and the Rural Hinterland. The site is severely constrained and there is no developer interest. This site represents the only alternative to meet the area's well evidence employment land needs.
	Some competition but different market sector/ land supply limits competition	3		
	Significant competition from similar nearby employment sites or competing centres	1		
Potential uses	High potential for B1 end uses in terms of market attractiveness and location	5		Though the area is very attractive to the market and a willing developer of the site has already been identified, we have scored the site as a "3" in comparison to other sites within the Borough
	Medium potential for B1 end uses in terms of market attractiveness and location	3	3	
	Poor potential for B1 end uses in terms of market attractiveness and location	1		

	High potential for B2 end uses in terms of market attractiveness and location	5		Though the area is very attractive to the market and a willing developer of the site has already been identified, we have scored the site as a "3" in comparison to other sites within the Borough
	Medium potential for B2 end uses in terms of market attractiveness and location	3	3	
	Poor potential for B2 end uses in terms of market attractiveness and location	1		
	High potential for B8 end uses in terms of market attractiveness and location	5		Yorkshire Land Limited are proposing to deliver small B1/B2 use class units at the site on account of its location and the desire to deliver a high quality designed, sensitive, business park.
	Medium potential for B8 end uses in terms of market attractiveness and location	3		
	Poor potential for B8 end uses in terms of market attractiveness and location	1	1	
	High potential for Non B class end uses/ Mixed Use in terms of market attractiveness and location	5		Yorkshire Land Limited are proposing to deliver small B1/B2 use class units at the site on account of its location and the desire to deliver a high quality designed, sensitive, business park.
	Medium potential for Non B class end uses/ Mixed Use end uses in terms of market attractiveness and location	3		
	Poor potential for Non B class end uses/ Mixed Use end uses in terms of market attractiveness and location	1	1	
Availability and constraints	Site has full or outline planning permission for employment development	5		Site currently located within the Green Belt but represents Previously Developed Land
	Site currently allocated for employment development in the UDP	3		
	Site is not allocated for employment development in the UDP	1	1	
	Site preparation works completed	5		Full site preparation works are still required but Yorkshire Land Limited have a 30-year track record of delivering previously developed sites in the Penistone area and are willing to invest £15m into the development of the site following its disposal by the MoD
	Site preparation works underway or committed	3		
	Full site preparation works are still required	1	1	
	Site preparation costs not a constraint to development potential	5	5	Full site preparation works are still required but the site will still be viable. Yorkshire Land Limited have a 30-year track record of delivering previously developed sites in the Penistone area and are willing to invest £15m into the development of the site following its disposal by the MoD.
	Site preparation costs could limit development potential but could be overcome by scale of development or other intervention	3		
	Site preparation costs significant limitation to development potential	1		
	Limited or no land ownership constraints	5	5	Presently the land is owned by the Crown and on account of the Government's proposals to dispose of surplus land, as set out in recent public statements, the site is earmarked for disposal in 2017 within the most recent MOD Disposal database
	Potential to overcome land ownership issues through negotiation or intervention	3		
	Land ownership issues significant constraint to development	1		
LOCATION				
Location	Site is within the urban area	5		The site is located outside any defined urban areas, but is within 600m of Oxspring and 1km of Thurgoland. The Trans Pennine Trail will provide a dedicated cycle route within 10 mins of Penistone train station. An existing bus stop is located directly adjacent to the site's entrance.
	Site has potential to form an extension to the urban area	3		
	Site is outside the urban area	1	1	
Land type	Site is Brownfield	5	5	The site represents previously developed land. The NPPF identifies that allocations of land for development should prefer land of lesser environmental value and encourage the effective use of land by reusing land that has been previously developed.
	Site is Greenfield	3		
	Site is undeveloped land in the Green Belt	1		
ENVIRONMENT				
Environmental Impacts	Development of site would have limited or no landscape impact	5	5	The site benefits from the presence of strong defensible landscape belts located on the northern, eastern and southern boundaries. The site will be designed sympathetically to ensure that existing features of environmental value are protected or enhanced where possible.
	Development impact could be overcome through mitigation	3		
	Development of site would have significant landscape impact	1		
	Development of site would have limited or no ecological impact	5	5	Due to the site's previously developed history, since the 1950's, it is not expected that there will be any significant areas of ecological value that couldn't be mitigated, retained or indeed enhanced.
	Development impact could be overcome through mitigation	3		
	Development of site would have significant ecological impact	1		
	Development of site within Flood Zone 1	5	5	The site is located in Flood Risk Zone 1.
	Development of site within Flood Zone 2	3		
	Development of site within Flood Zone 3a or b	1		
AMENITY				
Compatibility with surrounding land uses	Development of the site would have a limited impact on surrounding sensitive land uses	5	5	There are no sensitive land uses within proximity of the site. Any future employment use at the site would therefore be largely unconstrained. Enhancing the site's prospect as a deliverable and sustainable employment site.
	Development of the site would have a moderate impact on surrounding sensitive land uses	3		
	Development of the site would have a significant impact on surrounding sensitive land uses	1		
OTHER				
Local Plan	Site is within a Sub-regional or Principal town	5		The site is located outside any defined Sub Regional or Principal Town, but is within 600m of Oxspring and 1km of Thurgoland. The Trans Pennine Trail will provide a dedicated cycle route within 10 mins of Penistone train station. An existing bus stop is located directly adjacent to the site's entrance.
	Site is on the edge of a Sub-regional or Principal town	3		
	Site is outside a Sub-regional or Principal town	1	1	
		Total	88	

APPENDIX G

Blackmoor Business Park - PBP Scoring Against BMBC Employment Site Criteria

INDICATOR	DEFINITIONS	SCORE	Site Ref. P2 Land South of Sheffield Road, Penistone	PBP Scoring Synopsis
MEETING EMPLOYMENT NEEDS				
Potential to meet local employment needs	Site is within an area of above average deprivation	5		Site located within Penistone & Rural Hinterland Area.
	Site is within an area of average deprivation	3		
	Site is within an area of below average deprivation	1	1	
	Site has potential to provide local jobs in an area of above average employment need	5		Well evidenced need for new employment growth in Penistone & Rural Hinterland Area.
	Site has potential to provide local jobs in an area of average employment need	3	3	
	Site has potential to provide local jobs in an area of lower than average employment need	1		
Potential to meet wider employment needs	Site has potential to make a significant contribution towards the boroughs long term employment needs and stimulate further investment	5		Well evidenced need for new employment growth in Penistone & Rural Hinterland Area.
	Site has potential to make a contribution towards the boroughs long term employment needs and stimulate further investment	3	3	
	Site has limited potential to contribute towards the boroughs long term employment needs and stimulate further investment	1		
ACCESSIBILITY				
Accessibility for employees	Site is within 800m of a Railway station	5		Site within 1500m of Penistone train station.
	Site is within 1500m of a Railway station	3	3	
	Site is not within walking distance of a railway station	1		
	Site is within high frequency bus corridor	5		Site located within proximity of Bus Stops on Sheffield Road
	Site is within bus corridor with medium service frequency	3	3	
	Site is not within a bus corridor or limited service frequency	1		
	Site is within walking distance of large population centres and/or is served by dedicated cycle links	5	5	Site within 1500m of Penistone train station.
	Site is within walking distance of smaller population centres and/or is served by dedicated cycle links	3		
	Site has limited potential for walking and cycling from population centres	1		
	Committed public transport improvements within transport corridor	5		None known
	Potential for public transport improvements under investigation	3		
	No identified opportunities and none under investigation	1	1	
	Site could supply local jobs within an area of significant net out commuting	5		Well evidenced need for new employment growth in Penistone & Rural Hinterland Area.
	Site has potential to supply local jobs within an area of lower out commuting/or may not lead to a net overall decrease in commuting	3	3	
	Site could increase net in commuting into the Borough	1		
Accessibility for business needs	Site is in close proximity and/or has good access to an M1 or A1 junction	5		Access to the M1 is a 15-minute drive time from the site. Trips would be made along existing A class and B class roads. Potential issues in respect of low bridges though.
	Site is in reasonable proximity and/or has reasonable access to an M1 or A1 junction	3	3	
	Site is in poor proximity and/or has poor access to an M1 or A1 junction	1		
	Site has direct access to a high quality principal road network	5		Access to the M1 is a 15-minute drive time from the site. Trips would be made along existing A class and B class roads. Potential issues in respect of low bridges though.
	Site has no direct access to, but is in close proximity to principal road network	3	3	
	Site has limited or difficult access to the principal road network.	1		
	Road improvement scheme with committed or provisional funding	5		None known
	Road improvement scheme under investigation	3		
	No committed schemes or improvements under investigation	1	1	
	Rail freight access already provided	5		Site located within close proximity to Penistone Train Station but does not offer direct rail freight access
	Potential for rail freight access under investigation or been safeguarded	3		
	No potential for rail freight access	1	1	
DELIVERABILITY				
Market attractiveness	Identified market interest in the site	5		Though the site has been identified as a draft employment allocation for over a two-year period, we know of no developer interest in the site. This is probably on account of the site's delivery constraints.
	Number of serious enquiries into availability received	3		
	No identified market interest and limited or no enquiries received	1	1	
	Site is located within an area that is already attractive to the market	5		Though the site has no know developer interest and has deliverability constraints, we have scored the site as a "3" in comparison to other sites within the Borough
	Site is within an area with reasonable market interest or potential for future interest with further development/intervention	3	3	
	Site is within an area of limited or no market interest	1		
	Limited employment site provision within surrounding area	5		There are two existing employment areas located within close proximity of the site.
	Some competition but different market sector/ land supply limits competition	3	3	
	Significant competition from similar nearby employment sites or competing centres	1		
Potential uses	High potential for B1 end uses in terms of market attractiveness and location	5		Though the site has no know developer interest and has deliverability constraints, we have scored the site as a "3" in comparison to other sites within the Borough
	Medium potential for B1 end uses in terms of market attractiveness and location	3	3	
	Poor potential for B1 end uses in terms of market attractiveness and location	1		
	High potential for B2 end uses in terms of market attractiveness and location	5		

	Medium potential for B2 end uses in terms of market attractiveness and location	3	3	Though the site has no know developer interest and has deliverability constraints, we have scored the site as a "3" in comparison to other sites within the Borough
	Poor potential for B2 end uses in terms of market attractiveness and location	1		
	High potential for B8 end uses in terms of market attractiveness and location	5		Due to the site's surrounding uses, location and access constraints in respect of high sided vehicles, the site would not be suitable for B8 uses.
	Medium potential for B8 end uses in terms of market attractiveness and location	3		
	Poor potential for B8 end uses in terms of market attractiveness and location	1	1	
	High potential for Non B class end uses/ Mixed Use in terms of market attractiveness and location	5		Due to the site's surrounding uses, location and access constraints in respect of high sided vehicles, the site would not be suitable for non B-Class uses.
	Medium potential for Non B class end uses/ Mixed Use end uses in terms of market attractiveness and location	3		
	Poor potential for Non B class end uses/ Mixed Use end uses in terms of market attractiveness and location	1	1	
Availability and constraints	Site has full or outline planning permission for employment development	5		Site is currently located in the Green Belt within the UDP.
	Site currently allocated for employment development in the UDP	3		
	Site is not allocated for employment development in the UDP	1	1	
	Site preparation works completed	5		Full site preparation works are still required. However, due to the site's physical constraints there are serious concerns associated with the viability of the site.
	Site preparation works underway or committed	3		
	Full site preparation works are still required	1	1	
	Site preparation costs not a constraint to development potential	5		Full site preparation works are still required. However, due to the site's physical constraints there are serious concerns associated with the viability of the site.
	Site preparation costs could limit development potential but could be overcome by scale of development or other intervention	3		
	Site preparation costs significant limitation to development potential	1	1	
	Limited or no land ownership constraints	5		Though the site has been identified as a draft employment allocation for over a two year period, we know of no developer interest in the site. This is probably on account of the site's delivery constraints.
	Potential to overcome land ownership issues through negotiation or intervention	3	3	
	Land ownership issues significant constraint to development	1		
LOCATION				
Location	Site is within the urban area	5		The site is located between Penistone and Oxspring and could be considered as an extension to either settlement.
	Site has potential to form an extension to the urban area	3	3	
	Site is outside the urban area	1		
Land type	Site is Brownfield	5		The site represents undeveloped greenfield land located within the Green Belt.
	Site is Greenfield	3		
	Site is undeveloped land in the Green Belt	1	1	
ENVIRONMENT				
Environmental Impacts	Development of site would have limited or no landscape impact	5		The site's topography and location within a landscape character corridor associated with the River Don would mean that any development of the site could have a significant impact on an area of landscape sensitivity. There are also concerns associated with the coalescence between Penistone & Oxspring.
	Development impact could be overcome through mitigation	3		
	Development of site would have significant landscape impact	1	1	
	Development of site would have limited or no ecological impact	5	5	It is not expected that there will be any significant areas of ecological value that couldn't be mitigated.
	Development impact could be overcome through mitigation	3		
	Development of site would have significant ecological impact	1		
	Development of site within Flood Zone 1	5	5	The site is located in Flood Risk Zone 1.
	Development of site within Flood Zone 2	3		
	Development of site within Flood Zone 3a or b	1		
AMENITY				
Compatibility with surrounding land uses	Development of the site would have a limited impact on surrounding sensitive land uses	5		The site is located on the opposite side of Sheffield Road to existing residential land uses. The proposed development would therefore have an adverse impact on the residential amenity of existing properties.
	Development of the site would have a moderate impact on surrounding sensitive land uses	3		
	Development of the site would have a significant impact on surrounding sensitive land uses	1	1	
OTHER				
Local Plan	Site is within a Sub-regional or Principal town	5		The site is located on the edge of a defined Sub Regional or Principal Town.
	Site is on the edge of a Sub-regional or Principal town	3	3	
	Site is outside a Sub-regional or Principal town	1		
		Total	70	

APPENDIX H

Paul Butler
PB Planning Limited
PO BOX 827
YORK
YO31 6EE

Date 19 January 2018

Our ref:
DXCM\26112902.1\102743.010\CQWM

Direct tel:

Direct fax:

E-mail:

Dear Mr Butler,

Former Blackmoor PSD – South Yorkshire

Following enquiries on behalf of our client, Yorkshire Land Limited, we are advised by the Principal Estate Surveyor of the Defence Infrastructure Organisation that the former Blackmoor PSD site in its ownership at Oxspring, South Yorkshire will be marketed for sale by GVA Grimley in spring 2018.

We are aware of our client's interest in acquiring the site to pursue its redevelopment as a modern business park.

We have advised our client that it is essential to be fully aware of the planning status of the site prior to committing any substantial financial expense and it would be useful for all interested parties to have confirmation of the site's planning status within the Local Development Plan moving forward.

Yours sincerely

Dean T Copley
Partner
for Gateley Plc



Ship Canal House
98 King Street
Manchester
M2 4WU
DX 14317 Manchester 1

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

23rd January 2018

Dear Inspector Housden,

EMPLOYMENT NEEDS OF PENISTONE & THE WESTERN VILLAGES – UPDATE ON THE BLACKMOOR BUSINESS PARK PROPOSALS

We write to provide you with an important update in respect of Yorkshire Land Limited's development proposal on the previously developed land site to the south of Sheffield Road, Oxspring, which has been promoted under the name of the Blackmoor Business Park throughout the Barnsley Local Plan examination process.

We thought it prudent to write to you at this time, before you have released your findings in respect of the proposed employment site allocations and prior to the stage 4 Hearing Sessions.

Enclosed is a letter dated 20th January 2018 from Yorkshire Land Limited's solicitors, Gateley PLC, which confirms the current owners of the Blackmoor site (the Ministry of Defence) have now appointed agents GVA Grimley to market the property for sale as early as Spring of this year.

Considering that the employment site allocations of the Barnsley Local Plan has now been examined, we hope you would agree that it would be beneficial to all parties who may be interested in acquiring the Blackmoor site, to have further certainty of its planning status/potential allocation within the Barnsley Local Plan.

My client has of course made known its interest in acquiring the site to develop it for employment use. However, this would require a substantial financial commitment to purchase and redevelop the site and like any other party, my client would be unable to commit to such financial expense unless certainty can be provided.

At the point of writing this letter, it is likely that the Barnsley Local Plan examination will continue until at least the Autumn of 2018 and there is the potential for further delays once the Council's new evidence in respect of employment and housing growth has been examined further at the stage 4 hearing sessions.

If it was possible for you to provide any initial findings in respect of the Blackmoor Business Park proposal, then this would allow interested parties to commit funding towards the site's future development as early as March of this year.

Only if you consider that the site should be allocated for employment development of course. If not, then my client would need to consider the site's future redevelopment in accordance with existing national planning policy guidance. Especially as we consider the site to be sustainably located with good road and pedestrian links (via the Trans Pennine Trail) to the Principal Town of Penistone and as

it is also unaffected by low railway bridges in the area. However, there are additional planning risks associated with this approach. Risks which the site's allocation would of course remove.

You will recall that during the stage 3 Hearing Sessions of the Barnsley Local Plan Examination, we raised concerns with the quantum of employment land which is proposed to meet the needs of Penistone and the Western Villages during the Local Plan Period.

As we set out in our evidence, the only site which is presently proposed to meet the employment needs of these areas is site reference P2 (Land North of Sheffield Road, Oxspring) which makes up just 1% of the total employment land proposed across the Barnsley Borough.

Site reference P2 by the Council's own admission is a poorly performing site which is unlikely to come forward until at least 10 years into the plan period. Our evidence also identifies further factors which call into question the viability of the site, including the presence of low bridges which restrict access to high sided HGV vehicles and high voltage low hanging pylon lines.

Furthermore, the Barnsley Development Agency informed the Council in response to its request for evidence in respect of the need for employment in Penistone, that Penistone is seen as being one of the Boroughs most economically active parts of the Borough and that it is crucial the Penistone West ward has the ability to contribute to the overall Borough wide economic strategy targets.

During the Examination Hearings you asked Mr Jenkinson (Barnsley MBC Head of Planning) why the Council has not allocated more employment land to meet needs in the Penistone area. Mr Jenkinson informed you that this was because there was a lack of suitable sites.

Mr Jenkinson's comment is substantiated by the fact that, with the exception of my client, no landowners/developers have put forward land for employment development within this part of the Borough.

We apologise if you consider the submission of this letter to be out of sequence with the examination process. However, as we have received confirmation that the site will be marketed for sale as early as Spring of this year we thought it prudent to make you aware of this fact.

We also didn't want to miss a potential opportunity to look to bring the site forward for development (and contribute to meeting Penistone's and the Western Rural Area's employment land requirements) as soon as practicably possible.

It would therefore be helpful to all interested parties if you could publish your findings on the suitability of and requirement for employment land to meet the needs of Penistone and the western villages. Considering that no other party has promoted an alternative employment site for the Penistone Area throughout the Local Plan Preparation process and the Local Plan Examination has now been underway for over a year, we believe that there would clearly be no conflict of interests in this course of action.

Yours sincerely,

PAUL BUTLER
Director