

YORKSHIRE LAND

Limited

CONSULTEE ID: 23082

BARNSLEY LOCAL PLAN EXAMINATION 2018

STATEMENT REGARDING 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”

A BRIEF INTRODUCTION

Yorkshire Land Limited has been successfully developing in and around Penistone and the Western Villages for over 30 years, during which time it has brought tens of millions of pounds of investment and betterment into the local economy.

The Directors, Mr & Mrs Green, were born, bred and educated in Barnsley in the early 1960’s and have gained a vast and valuable experience of the Borough’s strengths and weaknesses and are highly knowledgeable of the area’s capacity to accommodate housing and employment allocations.

Whilst Yorkshire Land Limited is represented by Peter Brett Associates & PB Planning at Stage 4 of the Barnsley Local Plan Examination in Public and comprehensive Hearing Statements responding to the Main Issues and Questions for Stage 4 have been submitted by these representatives, we provide our own focussed response herein to Main Matter 16 of the Inspector’s MIQ’s, which serves to substantiate our professional opinion that the Local Plan cannot be found sound unless Main Modifications are made by the appointed Inspector, Mrs Sarah Housden BA (Hons) MRTPL.

16.1 IS THE EVIDENCE FOR THE REDUCED JOBS TARGET SET OUT IN THE BACKGROUND PAPER ROBUST AND IS IT CLEAR HOW THE 28,840 FIGURE HAS BEEN ARRIVED AT?

We do not consider that the evidence is robust. The Council submitted its Local Plan for Examination on the basis that it was a sound document. For the Council to amend its evidence retrospectively more than halfway through the Examination in Public makes a mockery of the process.

The Economic Strategy (2014-2033) sets out in paragraph 5.2 that:

“Without a concerted long-term commitment, our work has indicated the gap between Barnsley and the rest of the region is likely to widen hence, Barnsley’s efforts to reduce the current economic under performance will therefore need to be more ‘intense’ and indeed ‘move at a much faster pace’ to compensate the efforts of other local authority areas also delivering similar economic plans to raise their economic performance.”

This statement was based on the results of Barnsley’s first Local Economic Assessment, undertaken by Local Economic Futures, which identifies that Barnsley has an undersized economy and its educational outcomes whilst improving remain below national averages, The Economic Strategy also identifies that Barnsley has a deficit in business stock and in local jobs; high levels of worklessness, a low skills base and inadequate supply of appropriate development sites, executive housing and available business premises.

It was on this basis that the council has targeted significant growth through the Local Plan.

Importantly, the Council recognise in paragraph 5.4 of the Economic Strategy that Barnsley’s economy is still over reliant on the public sector, and that they recognise the need to do more in supporting the transition to a more private sector led economy.

For the Council now to row back on the compelling evidence which underpins the level of growth targeted in the Local Plan which has been submitted for Examination, in response to the Inspector’s interim Findings, whilst still wishing to maintain the same quantum of employment sites, suggests to us that the new job target has been presented as a tool to minimise the allocation of further housing sites to meet real objectively assessed needs in full.

It raises eyebrows that the Council’s decision to reduce the jobs target was taken prior to the publication of findings in the Arup Sustainability Appraisal Addendum in which Arup recognise the benefits to the local economy of the higher growth options, yet proceed to recommend Option A, which is the lowest growth option considered in that document. This Option appears to have been chosen retrospectively to support the Council’s decision to reduce the jobs target.

We would like to take this opportunity to make known our strongest dissatisfaction with the Councils handling of the Examination and the way the Council is now attempting to proceed with its Local Plan. The evidence base underpinning the Barnsley Local Plan spells out clearly what is needed in the Borough and the Local Plan should be the catalyst to make

this happen. Instead, this compelling evidence is being buried, overlooked and watered down by the Council to deliver a Local Plan which suits them, rather than seeking to meet the objectively assessed needs of the Borough and the aspirations set out in the Economic and Housing Strategies.

We believe much of the initial Examination process has been a complete waste of time, resources and financial expense in light of the fact that the initial stages must now be re-examined to assess the modified evidence which the Council has presented so late in the Examination process.

Significant housing and employment growth is needed urgently to meet objectively assessed needs; needs which are particularly acute considering the long standing lack of supply in the Barnsley Borough.

The Council submitted the Local Plan on the basis that it was to be a sound document yet has now indicated this is not the case and is instead moving the goal posts with retrospective evidence submitted to the Examination.

We have instructed Peter Brett Associates to prepare more detailed evidence on this topic which will be provided in their own Hearing Statement in response to this Main Matter.

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?

We believe that the proposed reduction in the Jobs Target will result in the Aims of the Jobs and Business Plan not being met. Likewise, Job Density will be adversely affected by the decision to reduce the overall employment target.

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)?

Whilst we do not believe that the evidence supports a reduction in the Jobs Target, clearly if this were to be accepted then we do not consider that the amount of employment land proposed to be allocated is justified. In addition, we consider that the employment land which is proposed should be better distributed to provide a sufficient quantum of employment land in the Penistone and the western villages to meet needs in these areas during the Local Plan period. The Western half of the Borough is home to 10% of the Borough's population and makes up over half of all land within Barnsley, however, only 1% of the total employment land proposed to be identified in the Borough has been allocated to meet the needs of Penistone and the Western Rural area.

A reduction in the Jobs Target clearly does not warrant a supply of Employment Land which is in excess of the jobs target and we would question why the Council would want to maintain a higher quantum of employment land than required by the reduced jobs target if this was in fact the correct target for the Borough.

16.5 DOES THE EVIDENCE PUT FORWARD BY THE COUNCIL IN BACKGROUND PAPER 8 DEMONSTRATE THAT EXCEPTIONAL CIRCUMSTANCES EXIST TO JUSTIFY THE RELEASE OF LAND FROM THE GREEN BELT LAND TO MEET THE EMPLOYMENT LAND REQUIREMENT? IF SO, WHAT ARE THEY?

We believe that Exceptional Circumstances have been demonstrated by the Council to justify the release of land from the Green Belt to meet the employment land requirement.

The Economic Strategy identifies that the Borough has an undersized economy and that Without a concerted long-term commitment, the Council's work has indicated the gap between Barnsley and the rest of the region is likely to widen hence, Barnsley's efforts to reduce the current economic under performance will therefore need to be more 'intense' and indeed 'move at a much faster pace' to compensate the efforts of other local authority areas also delivering similar economic plans to raise their economic performance.

Barnsley is a Green Belt Authority with 77% of land in the Borough identified as Green Belt. Housing and employment needs simply cannot be met without the need to release land from the Green Belt.

16.6. WOULD THE PROPOSED REDUCTION IN THE JOBS TARGET HAVE ANY IMPLICATIONS FOR BARNSELY'S CONTRIBUTION TO THE SHEFFIELD CITY REGION AND LEEDS CITY REGION STRATEGIC ECONOMIC PLANS (EB119 AND EB133)?

We believe that the proposed reduction in the jobs target will have negative implications on the basis that if the reduced jobs target is adopted, then fewer jobs will be delivered in Barnsley and hence a lower contribution of jobs and economic output is delivered by the Barnsley Authority Area.

16.7 OVERALL AND HAVING REGARD TO THE PROPOSED DELETION OF SITE RSV1 (PARA 11.1 OF BACKGROUND PAPER), WILL THE PLAN DELIVER AN ADEQUATE AMOUNT AND APPROPRIATE DISTRIBUTION OF EMPLOYMENT LAND OVER THE PLAN PERIOD?

We do not consider that the Local Plan will deliver an adequate amount of employment land for Penistone and the Western Villages or that the overall distribution of Employment Land

is appropriate. Penistone and the western Rural Area make up over 50% of land in the Barnsley Borough. However, only one site (reference P2) has been allocated to meet the employment needs of these areas over the Local Plan Period. This site represents just 1% of the overall supply proposed in the Borough.

Site P2 is a Greenfield and Green Belt site and as we have identified in our previous hearing statements, has a number of technical and viability constraints which are likely to prevent its delivery. It is identified in the Council's Main Matter 10 Hearing Statement site P2 scores relatively poorly but, given the lack of suitable alternatives it is proposed for allocation to ensure some new employment land provision is made in Penistone. EB37 Barnsley Employment Land Report Mott MacDonald April 2016 anticipates that the site is unlikely to be developed until over 10 years into the plan period (Timescale: Long term 10+years).

Having reviewed the Barnsley Green Belt Review document entitled 'Penistone and Neighbouring villages' it has become apparent that site P2 has not been assessed through the Green Belt Review despite being a Green Belt site.

As the Inspector is aware, we are promoting the Blackmoor Business Park site which is a previously developed site in the Green Belt situated between Oxspring and Thurgoland in a sustainable location adjacent with access to the Trans Pennine Trail, from where Penistone is just a 10 minute cycle ride away. There is also an existing bus stop located at the entrance to the site providing access to the surrounding villages of Oxspring, Thurgoland and Silkstone Common as well as the Principal Town of Penistone.

The Council's approach to employment land in the west of the Borough is such that it often appears that people residing in the western villages have been forgotten or overlooked. These people require opportunities to work close to home just as much as those people residing in the central and eastern parts of the Borough where the majority of employment land has been identified.

We are aware that many residents residing in the Western part of the Borough would welcome the opportunity to set up or relocate their existing business closer to home. Please see Appendix A, an article which featured in the Barnsley Chronicle on Friday 23 February 2017 which evidences the demand for workspace in Penistone and Appendix B, just one of many consultation responses we have received through the comments form on our proposed Blackmoor Business Park website (www.blackmoorbusinesspark.co.uk) from a local business owner looking for suitable premises in the Penistone Area.

Presently, the Local Plan seeks to distribute only 1% of the overall supply of employment land to meet the needs of the western part of the Borough, which makes up over 50% of land in Barnsley. We therefore believe that a more proportionate supply of employment land should be identified to meet the needs of Penistone and the Western villages.

Importantly, the revised Draft NPPF which is currently out for consultation would strengthen the argument we are making here (if adopted as worded) where it identifies 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.”

The allocation of our proposed Blackmoor Business Park, as an alternative or in addition to the site P2, 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 importantly re-use a previously developed site.

YORKSHIRE LAND Limited

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APPENDIX A

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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 B

From: A.M.Crossland [mailto:wordpress@blackmoorbusinesspark.co.uk]

Sent: 02 February 2017 20:43

To: office@yorkshireland-ltd.com

Subject: Blackmoor Business Park

Message Body:

The company I own is presently looking for suitable premises in the Penistone area, we at this moment employ around 12 people most haveing to travel through central Barnsley to our present premises factory. The Blackmore site would be ideal and would save on many miles of travel.

This e-mail was sent from a contact form on Blackmoor Business Park
(<http://www.blackmoorbusinesspark.co.uk>)

No virus found in this message.

Checked by AVG - www.avg.com

Version: 2016.0.7998 / Virus Database: 4756/13884 - Release Date: 02/02/17