

**Barnsley Local Plan – Main Matter 3 – Issue: Will the plan meet the OAN for employment within the plan period?**

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

We write on behalf of our client Yorkshire Land Limited (YLL) to provide their hearing statement to Main Matter 3 of the Barnsley Local Plan Examination in Public. The comments made in this statement should be considered alongside YLL's representations to the Publication Draft Barnsley Local Plan (PDLP) dated August 2016 with regards to their development proposals entitled the Blackmoor Business Park. A copy of the previous representations can of course be provided on request or alternatively viewed online at [www.blackmoorbusinesspark.co.uk](http://www.blackmoorbusinesspark.co.uk).

Whilst YLL are in support of the PDLP's economic objectives and believe the document establishes a sound objectively assessed need for future employment development across the Borough, they are concerned that insufficient employment land is being proposed in the Western Rural area of the Borough, particularly in Penistone.

We acknowledge that this stage of the examination does not deal with site specific considerations, we consider it prudent to identify our client's proposed solution to the issues raised in this statement with regards to meeting the employment needs of Penistone and the Western Rural area of the Borough. Especially considering we are not aware of any other competing sites for employment issues being proposed in the Penistone area at this point.

Penistone accounts for approximately 10% of the Borough's population. The settlement services the rural hinterland and provides the main focus of employment opportunity within the Western Rural area of the Borough. Importantly, Penistone and the Western Rural Area of the Borough geographically forms approximately half of the Barnsley Borough.

The PDLP recognises in Paragraph 5.54 that the unemployment rate in the town is lower than other parts of the Borough due to a large number of commuters, but that many residents still depend on the employment opportunities in the town. Opportunities that are considered to be even more important for the rural hinterland it serves.

Paragraph 5.56 further states that *Penistone is the main centre for the surrounding villages and we want to consolidate this role through the plan period.*

Notwithstanding the above, Policy E2 of the PDLP only seeks to distribute 1% of the Borough's future employment land opportunity to Penistone (3.3ha of a total 309.4ha).

Not only do YLL believe additional employment land should be identified in Penistone, but they also consider there to be deliverability issues associated with the only proposed employment allocation in the Town.

The Council's adopted Core Strategy at section 7 (Spatial Portrait) sets out in paragraph 7.79 the need to provide between 4.5 and 6.5 hectares of Employment Land in Penistone over the Core Strategy Plan Period (2008 to 2026). The PDLP now extends to 2033 and therefore at least a proportionate amount of additional employment land will be required to ensure that needs will be met over the extended plan period.

In the Sites and Places DPD of 2012, the Council proposed two potential employment sites to meet the needs of the Principal Town of Penistone these being: -

- P1 - Land South of Sheffield Road (Penistone) - 1.29 Hectares; &
- P2 - Land North of Sheffield Road (Oxspring) - 3.27 Hectares

Site Ref. P1 was the subject of a successful appeal allowing planning consent for residential use. Therefore, the only proposed site identified within the Draft Barnsley Local Plan (November 2014) to meet the employment land needs of Penistone is Site Ref. P2, which is located to the north of Sheffield Road, Oxspring. Site P2 is a Greenfield site located within the Green Belt.

Therefore, Site Ref.P2 which is situated within the Parish boundary of the village of Oxspring is now the only proposed employment allocation to meet the needs of Penistone within the PDLP. Resulting in Penistone having one of the lowest supplies of new employment land in the Borough.

Whilst the proposed employment Site Ref. P2 will go some way towards meeting the area's employment needs, 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. Indeed, Policy P2 of the PDLP identifies the constraint associated with the pylons alongside several other constraints associated with mature trees on the site's north eastern boundary; provision of a buffer strip, archaeological remains; and the listed Kirkwood Farmhouse located within 100m of the site.

In addition, 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. By way of example, a small printing business employing perhaps twelve staff, may have its paper delivered by a vehicle undertaking multiple drops around the country, very often the delivery vehicle may be a high sided lorry which would be unable to access the employment facilities at site reference P2, north of Sheffield Road, Oxspring. This is a major complication for any business considering business premises in the area. Furthermore, an increase in commercial vehicular traffic through the centre of Penistone 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'.

There are serious implications associated with the deliverability of proposed employment site allocation 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.

Consequently, given Penistone's role as the principal service centre for the Western Area of the Borough (which as we identify above, 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.

In response, YLL are proposing to deliver high quality B1 & B2 employment facilities at the former petroleum storage and distribution site located to the south of Sheffield Road, Oxspring. A proposed development which would be referred to as Blackmoor Business Park. Presently the land is owned by the Crown and on account of the Government's proposals, as set out in recent public statements, that they wish to maximise the redevelopment of previously developed sites owned by Governmental departments, we are confident that the land will be disposed of in due course. YLL have instructed agents in an attempt to secure the site.

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.

The site represents a previously developed site located within the Green Belt. The site extends to approximately 10.1 Hectares (25 acres) and was initially constructed in the mid 1950's by the Military 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. Approximately seventy staff were employed at the site in various roles

throughout this period, including but not limited to office based Admin staff, Garage Mechanical/Maintenance Staff and Petroleum Tanker Drivers. The MoD out sourced the maintenance of the (mothballed) site from 1997 until 2015, when decommissioning works commenced.

Importantly, the proposed allocation of site Ref.P2 to meet the employment needs of Penistone acknowledges Oxspring's capacity to accommodate development and reiterates the close relationship between the two settlements. The inextricable links between the two settlements are identified in the adopted Barnsley Unitary Development Plan (Volume 13 'Western Rural Area') at paragraphs 3.8 and 4.12 where it states that: -

#### **Paragraph 3.8**

***“There are few opportunities to provide new sites in the Community Area without encroaching into areas of Green Belt. However, the vulnerability of the Penistone Community Area due to its over-dependence on a few large scale employers and its shortage of suitable industrial land mean that there is an overriding need to identify a high quality site which serves the needs of both the Western Rural and Penistone Community Areas. The only site which has the available infrastructure and satisfactory topography and which is large enough to accommodate industry is located in the Green Belt at the former British Rail Oxspring Sidings site (in Oxspring).”***

#### **Paragraph 4.12**

***“Oxpring in particular is the location for the only major industrial proposal in the (Penistone) Community Area...Oxpring is one of the locations in the Western Community Area for additional development because of its physical relationship to the Penistone Urban Area and because it has the infrastructure capacity to accommodate some further development without serious detriment to the quality and character of the Green Belt.”***

Furthermore, and importantly, the senior Unitary Development Plan (UDP) Inspector Mr D A Harmston JP, FRICS, DipTP, MRTPI confirms in paragraph 13.4.219 on page 1201 of his Barnsley UDP Inspectors report that: -

***“I consider Oxspring is well located in the Community Area for additional housing development. This is particularly so in the light of its relationship to Penistone...”***

For clarity, the Oxspring Sidings site identified in Paragraph 3.8 of the adopted Barnsley UDP has long been developed and is now known as the Martree Business Park.

YLL proposed redevelopment of the Blackmoor Business Park site as a modern high quality employment facility will re-establish the site's employment activity. Through the proposed delivery of high quality B1 and B2 employment uses, it is our view that the site's redevelopment would have less of an impact on the local environment and infrastructure than the site's previous use.

YLL believe that the site would be suitable as a high-quality business park serving to meet the needs of Penistone and the Western Rural Area. As alluded to above we consider the most appropriate employment uses for the site to be B1 and B2 uses. More specifically: -

- Offices;
- Research & Development of Product or Processes;
- Light Industrial; &
- General Industrial

The site can accommodate small starter units through to larger premises for established businesses.

The proposals will focus on providing high quality employment facilities for BMBC's identified priority employment sectors as set out within the PDLP. They will enhance the sustainable growth of Penistone,

whilst also contributing to maintaining sustainable rural communities and viable villages in the Western Area of the Borough. The delivery of the site will also drastically enhance sustainability in respect of reducing out commuting and journeys to work, thereby reducing the use and reliance on the Private Car.

Existing road access is provided by the B6462 'Sheffield Road' which has proven suitable to accommodate Heavy Goods Vehicles, with a fleet of large petroleum tankers having previously operated from this location, as set out above.

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. The site's south western boundary is formed by the Trans Pennine Trail which provides excellent pedestrian/cycle connectivity to the wider area, including the Principal Town of Penistone (which is approximately 10 minutes away by bicycle) and a strong defensible boundary from the Green Belt beyond.

The location of the 'Blackmoor Business Park' ensures that any associated commercial vehicular traffic does not have to travel through the centre of Penistone and is not affected by the low bridges in the area.

Accordingly, the allocation of the Blackmoor Business Park could help to meet the potential deficit in employment land in Penistone as a result of complications associated with the development of Site Ref. P2. Whilst also providing for the delivery of additional very high quality employment facilities on a previously developed site which is situated in a sustainable location with inextricable links to the Principal Town of Penistone.

The PDLF identifies that 170ha of land is to be removed from the Green Belt to deliver the Borough's employment land needs. Whilst the site's allocation would "technically" increase this figure, it would not involve the release of land that meets the identified purposes of the Green Belt on account of it being previously developed land.

Importantly, views to and from the site are extremely limited on account of the site's strong defensible boundaries. Meaning that subject to sensitive design the development of the site would not have an adverse impact on the openness of the wider Green Belt.

The site is located within a sustainable location and there are no technical constraints that would preclude the development of the site.

The NPPF identifies that the Government is committed to securing economic growth in order to create jobs and prosperity, making it easier for jobs to be created in cities, towns and villages. A core planning principle of the document is to proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs.

With regard to the Blackmoor Business Park proposals, 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 PDLF 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.

Finally, and specifically 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.

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.

Given the deliverability of the proposed Blackmoor Business Park and its proximity to Penistone, we believe that the allocation of the site would help to meet the identified employment needs of the town and the wider western rural area of the Borough.

**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 potential allocation of YLL's Blackmoor Business Park development proposals.**