

Supplementary Planning Documents Consultation Statement

Adopted November 2019









Introduction

Public consultation took place on 8 draft Supplementary Planning Documents and Planning Advice Notes for a period of four weeks between 16th September and 14th October 2019. A total of 38 comments were received from 7 consultees. One late response was received which made 3 comments.

The Council adopted all 8 documents on 28th November, 2019. The adopted documents are:

- Sustainable Travel SPD
- Planning Obligations SPD
- Parking SPD
- Section 38 Agreements Planning Advisory Note
- Section 278 Agreements SPD
- Development Affected by Contaminated Land SPD
- Elsecar Conservation Area Design and Maintenance Guide SPD
- Cawthorne Village Design Statement

Who we consulted

- Barnsley Economic Partnership
- Infrastructure Providers
- Duty to Cooperate Bodies
- Bodies and organisations with a topic specific interest
- Developers and Agents active in the Borough
- Housing Associations active in the Borough
- Parish Councils

How we consulted

- Emails or letters sent to the above consultees
- Press advert in the Barnsley Chronicle 13th September 2019

- Press Releases (including use of the Council's Facebook and Twitter Pages) and press coverage through the course of the consultation period.
- Documents made available on the Councils website
- Documents were made available at Library@the Lightbox and Branch Libraries across the Borough (online and paper form)

Response to Consultation

The tables below set out the main issues raised during consultation. They summarise the main points and any key changes made to the documents as a result of comments received.

General/ overarching comments

NUMBER OF COMMENTS: 1	
MAIN ISSUES RAISED	HOW THE ISSUES HAVE BEEN ADDRESSED
None of the topics were in the respondents sphere of interest therefore no comments.	N/A

PLANNING OBLIGATIONS SPD

This is a new SPD which introduces the topic specific SPD's which seek section 106 contributions (Sustainable Transport, Affordable Housing, Financial Contributions for Schools and Open Space Provision on New Housing Developments). This SPD sets out priorities for contributions. It makes it clear that where multiple developer contributions are required those for schools and sustainable travel will take precedence.

A previous draft of this SPD was consulted on and the comments summarised in the consultation statement for the documents consulted on in tranche 1. The tranche 1 consultation statement can be found here. <u>https://www.barnsley.gov.uk/media/10958/spd-consultation-statement.pdf</u> From those comments a change was made to this latest draft to remove the term 'non negotiable'.

Key changes made as a result of comments below: None

NUMBER OF COMMENTS: 4 plus 1 late comment

MAIN ISSUES RAISED	HOW THE ISSUES HAVE BEEN ADDRESSED
Generally supportive of the provisions within the Planning Obligations	Support welcomed. No changes required.

- The SPD states that contributions will be secured through planning obligations where necessary provisions are not made directly by the developer. It also provides for the pooling of contributions to be used to delivery necessary infrastructure where required, which is supported. Paragraph 4.2 identifies that contributions towards sustainable travel will take precedent and will be non-negotiable, which is welcomed.
- reference is made to seeking contributions toward highways infrastructure works through Section 278 Agreements, which is stated in Paragraph 4.5
- welcome the cross referencing to the supporting text of Policy I1 and specifically Paragraph 25.4, which states in relation to the pooling of contributions that, "It may be necessary to consider the cumulative effect of a number of developments such that developers may be required to contribute jointly towards necessary infrastructure". We are also supportive of the requirement for, "All new development should therefore make appropriate provision to contribute towards offsetting the additional pressures it has created whether this is through on or offsite provision of facilities or financial contributions", along with the requirement for developers to demonstrate that, "adequate capacity either exists, or that provision will be made to meet the necessary infrastructure requirements within an appropriate timescale".

Recommends that both the Planning Obligations SPD, and the next iteration of the Financial Contributions to Schools SPD, be amended to include reference to the recently published guidance on education provision in garden communities and securing developer contributions for education, at <u>https://www.gov.uk/government/publications/delivering-schools-to-</u> support-housing-growth

next review.

We will consider incorporating this into the School Places SPD on

 Generally supportive, in particular the following points: the approach set out within paragraph 4.2 (page 3) of the SPD which states: 'Where contributions are required for school places or sustainable travel, these will take precedence'. This approach will help to ensure that the need for additional school places arising from new housing developments are appropriately funded, and school places are provided in a timely manner. welcomes the commitment within the sister SPD (Financial Contributions to Schools (Adopted May 2019), signposted within this SPD, that the funding requirements for new schools will be based on the DfE scorecards as this accords with guidance and Planning Practice Guidance. supports the use of planning obligations to secure developer contributions for education wherever there is a need to mitigate the direct impacts of development, consistent with Regulation 122 of the CIL Regulations. The advantage of using Section 106 relative to CIL for funding schools is that it is clear and transparent to all stakeholders what value of contribution is being allocated by which development to which schools, thereby increasing certainty that developer contributions will be used to fund the new school places that are needed 	Support welcomed. No changes required.
Signposts to the Developer Loans for Schools prospectus for information.	Comment noted.
Planning Obligations should be sought in accordance NPPF policy and in accordance with the three tests stipulated in legislation and paragraph 55 of the NPPF, i.e. necessary, directly related to the development and fair and reasonably related to the scale and kind of development. Whilst, the Planning Obligations SPD clearly states the three tests, the SPD makes clear that precedence will be given to the contributions towards School Places and Sustainable Travel. This SPD does not provide for flexibility in respect of specific site requirements for applicants and the Council to determine which	Late representation. It is considered that the SPD does seek contributions in accordance with NPPF. No change proposed.

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SUSTAINABLE TRAVEL SPD

This is a new SPD which seeks contributions to sustainable and active travel. An earlier version was consulted on with the first tranche of SPD's that were adopted in May 2019. The methodology for calculating contributions in this revised version has been changed and is based on trips generated by a scheme, with reductions depending on whether it is located in Town Centre or a District Centre, or in the Accessibility Improvement Zone (AIZ). This SPD also sets out the number of electric vehicle charging points to be provided by developments as a minimum.

The comments made on the first draft were summarised in the consultation statement for the documents consulted on in tranche 1. The tranche 1 consultation statement can be found here. https://www.barnsley.gov.uk/media/10958/spd-consultation-statement.pdf

of the formula for non-residential development.

NUMBER OF COMMENTS: 16 plus 2 late comments	
MAIN ISSUES RAISED	HOW THE ISSUES HAVE BEEN ADDRESSED
 The SPD is generally supported, in particular the following points: The overall objective of the SPD is to, "ensure that the accessibility of new development via public transport, walking and cycling is acceptable in order to promote sustainable transport and active travel and where possible enhance the safety, efficiency and sustainability of the transport", which is supported welcome that reference is also made to the Planning Obligations SPD in relation to securing contributions towards 	

- Barnsley's strategy to deliver a sustainable pattern of development which considered the accessibility of sites as a key means of reducing transport infrastructure requirements is fully supported, particularly the concept of locating development to reduce the need to travel by car.
- Paragraph 4.9 details how the provisions within the SPD will contribute to achieving the aspirations of Policy T3 to promote reducing car usage and dependency. It identifies that developers will be expected to provide a capital contribution towards public transport and / or active travel infrastructure which is supported. In terms of how these contributions are calculated, the approach and level of flexibility is considered to be sensible.
- Section 9 states that "Early pre-application discussions with the BMBC's Highway Development Management section and Highway's England (where development is likely to be generated on its network) are strongly recommended to determine the level of assessment that may be required', which is particularly supported. Formal pre-application discussions are an effective means of gaining a good, early understanding of the development, its benefits, its likely impacts and its infrastructure needs. Consultation at preapplication will ensure that the transport assessment prepared is appropriately scoped and is based on the most relevant and up-to-date data. It will also ensure awareness of, and can take account of, any SRN issues that might have a bearing on the way in which the development is planned and/or delivered.
- Section 9 details the support that the Council is able to provide as part of the Travel Plan preparation process and states that, "a Travel Plan will ideally represent a partnership approach between the applicant, the developer, the Council and any third parties, such as Highways England...". welcomes that this makes reference to engaging with Highways England.
- The SPD incorporates a new Section 10 which details the support the Council will provide to applicants in relation to the

production of Travel Plans. Paragraph 10.1 states that their production will, " <i>ideally represent a partnership approach</i> <i>between the applicant, the developer, the Council and any</i> <i>third parties, such as Highways England, car club providers,</i> <i>public transport operators and active travel providers</i> ", which is particularly supported.	
General support and overall the document is welcomed. Considers it is encouraging to see the breadth and depth of information within the SPD. The document adds value to the relevant Local Plan policies by providing detail on many critical issues, which are covered in a rigorous but pragmatic way so that they can be readily interpreted by developers and the wider public. Overall welcomes the production of this SPD and the role it can play in helping to deliver more sustainable development across Barnsley.	Support welcomed.
 Introduction and Context Section 2 Since the finalisation of the SCR Transport Strategy in February 2019, the MCA and local authorities have been working together to develop a number of implementation plans so that the priorities in the strategy are delivered. These are: Integrated Rail Plan, which was formally launched in July 2019 Active Travel Plan (due January 2020) Roads plan (due January 2020) Public Transport Plan (due early 2020) Although the majority of these plans are still to be finalised, all will be agreed over coming months and so it would be helpful for the SPD to reference these alongside the SCR Transport Strategy as an important part of the general context within which the SPD needs to be considered. 	As some of the documents won't be finalised until after the SPD is adopted a reference will be added to various emerging and existing SCR plans.
Financial Contributions towards public transport and active travel (Section 4)	Changes to be made.
Suggests the following additional points could be inserted into this section of the SPD to give a little more clarity on rail	

and active travel, as well as the links between the two:

- At Para 4.2-suggest that additional text or an additional bullet is added to reflect the need to "..... raise awareness of and remove barriers to accessing public transport".
- Para 4.5 "rail station plan" should be referred to as "South Yorkshire Station Plan". Could this text be replaced with a reference to "Community station improvements' outlined within the Integrated Rail Plan".
- Towards the end of this section an additional paragraph could be included to broaden out active considerations, ie "4.12 Whilst the focus for active travel facilities is often on journeys to work, education and shopping, it is important to include access to green space and leisure *routes*, these should also include provision for running and be fully accessible. If there are traffic free *routes*, these should feel safe for *users*, and lit where appropriate."

What contributions will be used for (Section 6) It would be helpful if the SCR Active Travel Implementation

Plan is referenced in Section 6 of the SPD "What will the contributions be used for" as an area of likely spending that can be supported.

The bullet points following paragraph 6.6 of the SPD cover walking and cycling and additional points could be added to strengthen the links between individual

The first bullet will be added.

Proposed 2nd bullet will be added with the following amendments:

It is essential Where feasible and practical that new developments will connect into and develop the active travel network. The Active Travel Implementation Plan will include a future network map to be developed by 2040 and developer contributions should be targeted at that"

 developments and the wider active travel network, specifically: "The SCR active travel programme is currently developing infrastructure guidelines and it is important that walking and cycling provision is of sufficient width, quality and accessible to all. It is essential that new developments connect into and develop the active travel network. The Active Travel Implementation Plan will include a future network map to be developed by 2040 and developer contributions should be targeted at that" 	
 Under the corresponding sub-section on Rail, it would also be helpful to: add a reference to the SCR Integrated Rail Plan to the first bullet point and amend the point to read "SYPTE rail station Option Selection Reports" (rather than SYPTE Stations Option Review) provide additional text at the end of the second bullet to add "and improved pedestrian and cycle access to stations and cycle parking facilities". 	Suggested changes will be made.
The bullet point on Rail Park and Ride could also be amended to read "Expansion of existing <u>or creation of new</u> rail park and ride sites, where feasible".	Suggested changes will be made.
Electric Vehicle Charging Points (Section 8) The SPD provides straightforward and clear requirements on EV charging points. As part of this, would also question whether the guidance could also suggest a requirement for parking space(s) for the establishment of car sharing clubs in larger developments. This may be within or additional to space for EV charging	Consider that this is covered in Travel Plan section at paragraph 11.4 therefore no further change.

points but would provide an indication of how large-scale residential development provides the opportunities for reducing the impacts of private motorised transport in a number of different ways.	
Travel Plan Measures (Section 11 and detail in annexes) The SPD is particularly strong in setting out the appropriate contents of a travel plan, with a detailed list of headings and a checklist of measures at section 11. Within this section, measures to promote walking and cycling are listed separately. Although this is readily understandable, a stronger approach may be to link cycling and walking more closely under the general heading "active travel and accessibility" so that all forms of active travel are given a higher status and issues of accessibility are encompassed together.	Add for example direct routes with high levels of natural surveillance to both sections. Point 2 under measures to promote cycling add routes to public transport hubs
In terms of measures to promote walking and cycling, the points on site layout design (ie points 2 and 1 respectively) could usefully emphasise the need to optimise all forms of active travel both into and within the site, with a greater emphasis for more direct routes given to cyclists and walkers. Cycle facilities can often be placed as an after-thought and developers should be encouraged to locate them in visible, public places to provide the highest level of informal surveillance possible.	
Point 2 on segregated cycle paths also needs to refer explicitly to routes to rail stations (as well routes to school and work) to illustrate the importance of integrated travel.	
In terms of measures to promote public transport, could the word "stops" at point two be removed as this infers bus stops and may inadvertently exclude rail stations. Point 3 of this sub section could also include way-finding signs to key transport nodes, such as rail stations.	Agree to delete 'stops' Agree to add additional point regarding way finding signs.

 Design Guidance (Section 12) The draft SPD refers to the Design Manual for Roads and Bridges and the Manual for Streets at the very end of the document. These are critical reference points for active travel, particularly the MfS which has proved to be successful in changing the approach of designers and local authorities to walking and cycling. Design guidance is developing rapidly in this area and several Local Transport Notes are currently being produced by the DfT that update active travel infrastructure. As such, it may be helpful to raise the profile of this guidance earlier in the SPD as well as bring the readers' attention to other forms of advice and guidance that provide good practice on active travel. For example, this includes: London Cycle Design Guide International cycle design best practice – John Parkin NACTO Global Street Design Guide 	Agree to move the existing text to section 9 on planning permission to give more prominence. The list of other examples is not to be added.
Contribution Figures (Appendix C) Appendix C of the document is helpful in explaining how contributions towards sustainable travel are calculated. This currently focuses on schemes in the Infrastructure Delivery Programme and Transforming Cities Fund, with updates to be undertaken periodically when updated evidence and information is available. As part of this suggests inclusion of more active travel schemes in the scheme list, such as those included in the Transforming Cities Fund bid which Barnsley have played an important role in helping to prepare.	We will review the SPD in due course when more detail on schemes is known. Not currently relevant to methodology therefore we will consider inclusion when figures are reviewed.
	A reference to the final point will be added to final point "and other

In addition to the Barnsley Transport Strategy and SYPTE station plan (which is now completed), it would also be important to reference here the SCR Transport Strategy and forthcoming Active Travel Implementation Plan. As noted above, this will define a key route cycle network and include generalised costs for appropriate crossings and other infrastructure that could be used to update costings	relevant SCR documents as they emerge."
 Objects to the SPD on the following grounds: The proposed contribution formula found in Section 5 is unclear, vague and misleading in terms of how it should be applied; and There should be greater clarity within the SPD as to the types of provision that would be paid for by the financial contribution towards 'Public Transport and Active Travel' and those 'standard' or site specific sustainable transport measure that would still be required for all developments. 	No change proposed.
Considers that until there is more certainty and information is provided on these two matters, the SPD should not be adopted. Would like further opportunity to comment when this information is provided. Proposed Contribution Formula From studying the contribution Formula for both residential and business space, reference is made in the draft SPD to an element identified as ' £ figure to be determined ' but there is no mention within the text of document or Appendix C as to how the value of this figure is derived. It is important that the SPD is precise and clear in terms of how the contribution is calculated but the formula does not fulfil this objective.	The formula for non -residential development is to be deleted from this draft. Sustainable travel contributions from non-residential developments will be devised on a site by site basis depending on what is needed to achieve modal shift targets. It is proposed that a cross reference to appendix C is added underneath the formula to ensure it is clear where the up to date figure to insert into the calculation can be found.
Within Table 1 of Appendix C the development types refer to residential uses (houses or flats) and Office Space only. This is not helpful as the SPD does not currently provide an extensive list of potential uses that could be eligible for this financial contribution. Without knowing the Person Trip Rates for all other eligible uses, the draft SPD does not give us the opportunity to work out the likely level of contribution required.	Delete reference to office space

Reference is made to Section 122 of The CIL Regulations 2010 which confirms that 'a planning obligation may only constitute a reason for granting planning permission for the development if the obligation is fairly and reasonably related in scale and kind to the development'. The SPD should therefore offer transparency through clear guidance as to the workings behind the formula so that a proper evaluation can be made as to whether the calculation would generate an amount that would be considered reasonable in the context of the CIL Regulations.	It is considered that the SPD is clear. No change proposed.
The Uses of the Contribution Section 6 of the draft SPD seeks to clarify how the contributions will be used. In the case of new developments located outside the defined town centre the SPD confirms that contributions will be used to help finance the necessary public transport enhancements scheduled for that settlement or corridor of the town in which the development is located.	It is considered that the SPD provides sufficient clarity.
However, at paragraph 6.5 it also confirms that the contributions will not be used to contribute to basic on-site public transport infrastructure such as pedestrian links, bus stops, shelters, and real time displays which should be provided as standard for all developments. Paragraph 6.6 goes on to assume that individual types of infrastructure will be detailed in the Section 106 agreement.	Sentence to be added for clarity to read " <i>These will typically be covered under</i> S278 or S38 agreements where appropriate."
It is important to understand and achieve clarity within the SPD as to the distinction between the more strategic enhancement measures and those more site-specific sustainable travel measures that would still be subject to a S106 agreement. It would be helpful if the SPD could provide a schedule in an appendix which identifies a list of likely measure that could fall within the two categories to avoid any misunderstanding. This approach would also give the developer transparency of all potential requests on an upfront basis. For example, it is unclear as to whether the cost of an extension and rerouting of an existing bus service would form part of the financial contribution towards Public Transport and Active Travel. Similarly, we suspect that the costs associated with appointing a Travel Plan	

Coordinator would be a site specific matter and form part of a S106 agreement. These points should be made more explicit within the document hence the reason for our suggestion of a list or table to distinguish between the two categories of payment that may be required by your authority.	
The Sustainable Travel SPD, should clearly set out the up to date evidence base as to how the Council have derived at the suggested policy requirements. In particular, the Council identify the preparation of a Transport Strategy, which is yet to be finalised. The SPD needs to clearly set out that the requirement for contributions should provide flexibility for all applicants to demonstrate whether particular circumstances justify the need for a viability assessment and thus inform discussions with the Council on the priorities for delivering obligations on site.	Late representation. It is considered that the SPD does clearly set out how the figure has been arrived at. No change proposed.
Barnsley has low market value areas and placing a general obligation across all sites within the Borough, will place further pressure on scheme viability and encumber the deliverability of development. Furthermore, the Council should consider differential rates based on house types, similarly to parking provision. Welcomes the opportunity for developers to provide an alternative approach to calculation should they consider the Council's approach is inappropriate.	
Questions paragraph 8.1 which states that development will be required to provide electric vehicle charging points. In the case of residential development, the SPD states that 1 charging point per unit (dwelling with dedicated parking), or 1 charging point per 10 spaces (unallocated parking). There are no adopted Local Plan policies which specifically require this level of provision on site. We would request further clarification on type of charging points the Council are seeking, as this may place further costs on the scheme viability. Furthermore, we would request that the SPD provides flexibility in the delivery of the charging points to be based upon the site's accessibility and consideration of proposed improvements as a result of this development.	Late representation. Local Plan policy CC1 Climate Change provides a policy basis for this requirement. No change proposed.

PARKING SPD

This is an update of a 2012 SPD. The policy context and some of the parking standards have been updated.

Key Changes from previous version: The reference to the parking standards being 'maximum' has been deleted and some standards updated.

NUMBER OF COMMENTS: 1	
MAIN ISSUES RAISED	HOW THE ISSUES HAVE BEEN ADDRESSED
General support particularly the following points:	Support welcomed. No changes required.
 The SPD includes standards that have been designed to be used as part of a package of measures to, "promote sustainable transport choices and efficient use of land, enable schemes to fit into central urban sites, promote linked trips and access to development for those without the use of a car and to tackle congestion". The approach proposed can generally be supported, particularly with regard to supporting a level of parking that is commensurate with maintaining sustainable transport choice. Paragraph 3.2 confirms that the guidelines set out in the SPD have been based upon the accessibility of the area by other means of transport and developers will be expected to reduce the levels of car parking provided where there are more sustainable transport options available. 	

Key Changes made as a result of comments below: No changes made

SECTION 278 AGREEMENTS SPD

This is a new SPD which sets out the process of Section 278 agreements which relate to works within the highway.

Key Changes made as a result of comments below: Cross reference to Highways England Guide and text advising developers to contact Highways England to be added.

NUMBER OF COMMENTS: 1	
MAIN ISSUES RAISED	HOW THE ISSUES HAVE BEEN ADDRESSED
The provisions and requirements within the SPD relate purely to the local highway and do not extend to the SRN. As such it is considered that the SPD would benefit from the inclusion of a cross reference to Highways England's Guide, which establishes the general approach to the S278 process and the most common mechanism used for procuring works associated with the SRN. In particular, Paragraphs 131 – 142 cover third party funding agreements including S278 Agreements. It should be noted that where possible, in situations where the S278 involves both Highways England and the Local Highway authority, a single agreement will be proposed with both bodies working collaboratively on the agreed mitigation. As such, it is recommended that developers contact the relevant Highways England regional planning team for further information regarding third party funding for highways mitigation.	Text to be added to this effect.

SECTION 38 AGREEMENTS PAN

This is a new PAN which sets out the process of Section 38 agreements which relate to adoption of highway.

Key Changes made as a result of comments below: No changes made.
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NUMBER OF COMMENTS: 0

DEVELOPMENT ON LAND AFFECTED BY CONTAMINATION

This is a new SPD which gives information on how to deal with contaminated land.

Key Changes made as a result of comments below: Updated references included and text amended accordingly where not a Local Plan policy

NUMBER OF COMMENTS: 5	
MAIN ISSUES RAISED	HOW THE ISSUES HAVE BEEN ADDRESSED
We are pleased to see that this document has been part of the SPDs for the new Local Plan. Overall the content is good and contains what we would like to see for an SPD of this type.	Support welcomed
The document refers throughout to the contaminated land guidance CLR11, Model Procedures for the Management of Land Contamination. This document was archived in 2016 and has been replaced with 'Land contamination: risk management' which is available on gov.uk https://www.gov.uk/guidance/land-contamination- how-to-manage-the-risks. We would advise that all the references to CLR11 be replaced with	Reference to be amended accordingly.
this new document.	
Appendix 1 – B states that the DoE industry profiles are available to download free of charge from gov.uk. We agree that these documents are a useful resource to direct the reader to, however we don't believe they are available on gov.uk. The documents are available on the CL:AIRE website here: https://www.claire.co.uk/useful-government- legislation-and-guidance-by-country/198-doe-industry-profiles	Reference to be amended accordingly.
Page 3 of the SPD. Purple box, first bullet: replace 'work out' with 'identify'	This is the adopted Local Plan policy CL1. The wording of this cannot be changed through the SPD process.
Page 9 of the SPD. First line of second paragraph: replace 'influence' with 'impact'	Text amended accordingly

Elsecar Conservation Area Design and Maintenance Guide SPD

This is a new SPD which supports the Elsecar Heritage Action Zone (HAZ) and the conservation area status.

Key Changes made as a result of comments below: Suggested changes to text and formatting made.

NUMBER OF COMMENTS: 10	
MAIN ISSUES RAISED	HOW THE ISSUES HAVE BEEN ADDRESSED
Welcomes the SPD and considers it is a key part of securing the legacy of the Heritage Action Zone within the village. The SPD contains a lot of useful information and is written in plain English which hopefully makes it accessible to homeowners, landlords and potential developers. Considers the amount of information contained within the SPD is required to provide clarity to these groups and also to make the document useful for Planning and Conservation Officers.	Support welcomed.
The reference to the Heritage Action Zone could be clarified to say that the area was a Heritage Action Zone in partnership with Historic England from 2017-2020. The SPD will be used for the whole plan period so this makes the duration of the Heritage Action Zone project clear.	Suggested change to be made.
In order to make the document easy to use we recommend greater use of text boxes, subheadings and paragraphs numbers which would make the text more accessible and easier to reference.	Suggested formatting changes to be made.
In particular, the last two paragraphs of the section on roofs (starting "when dealing with any historic building") would be best included within a text box as they are helpful advice to building owners rather than necessarily planning advice.	Suggested formatting changes to be made.
A subheading for pointing would be useful.	Suggested formatting changes to be made.
A map showing the conservation area would be useful, it would perhaps be best to include this as a link to the Barnsley conservation area maps in case these are updated in future and this would avoid having to update the SPD.	Link to be added.
The authors of the Historic Area Assessment should be referenced as: Rimmer, Went and Jessop 2019 (as opposed to the previous order of	Change to be made.

Jessop, Rimmer and Went).	
Part Two: Historic Housing Character Areas. Caption to second page of images mentions 'Fitzwilliam St John Carr type houses' and also in the table - 'H - John Carr style houses/shops'. Though we likened these buildings to the John Carr-style housing in the Historic Area Assessment because of their design features, it would be better to avoid giving them the John Carr label in the published SPD as there is a risk that this could be misunderstood/ inadvertently misused over time.	Change to be made.
It would be useful if the photographs of the character areas were labelled and ordered to correspond with the character areas shown in the best practice guidance table over the page. For example using the "A-Old Row, B-Station Row" format and putting the photographs in the same order as they appear in the table.	Labelling to be added and order of photographs to be changed.
Elsecar SPD best practice guidance table. To make this section clearer and easier to read the rows headed "how it is now" could be omitted. This would make it clearer to homeowners, landlords etc. what the best practice is and what they should be aiming for.	Suggested change to be made.

Cawthorne Village Design Guide

This is an update of a previously adopted document. The policy context has been updated.

Key Changes made as a result of comments below: No changes made.

NUMBER OF COMMENTS: 0