Sustainability Appraisal Representations

11 representations were received on the Sustainability Appraisal.

Of these, 8 representations were made online but actually referred to the Local Plan. We have recreated those representations attached to the correct consultation point in the Local Plan.

The following 3 representations were the only representations received that referred to the Sustainability Appraisal
Comment

Consultee: Mr Merlin Ash (838313)
Email Address: Natural England
Company / Organisation: Natural England
Address: 

Event Name: Local Plan Publication Sustainability Appraisal 2016
Comment by: Natural England (Mr Merlin Ash)
Comment ID: 7
Response Date: 19/08/16 09:23
Consultation Point: Local Plan Publication Sustainability Appraisal 2016 (View)
Status: Processed
Submission Type: Web
Version: 0.2

Do you consider that the Local Plan is legally compliant?
Yes

Please give reasons for your answer to Question 1.
Notwithstanding our concerns regarding the Habitats Regulations Assessment, Natural England are content that the Sustainability Appraisal is legally compliant in so far as our statutory environmental interests (including but not limited to statutory designated sites, landscapes and protected species, geology and soils) are concerned.

Do you consider the Local Plan is compliant with the Duty to Cooperate?

In your opinion, is the Local Plan positively prepared?

In your opinion, is the Local Plan justified?
In your opinion, is the Local Plan effective?

In your opinion, is the Local Plan consistent with national policy?

Question 8

If your representation is seeking a modification to the Local Plan, do you consider it necessary to speak at the Independent Examination?  No
Do you consider that the Local Plan is legally compliant? Yes

Do you consider the Local Plan is compliant with the Duty to Cooperate? Yes
In your opinion, is the Local Plan positively prepared? No

Please give reasons for your answer to Question 3.
Please see Barton Willmore Covering Letter

In your opinion, is the Local Plan justified? No

Please give reasons for your answer to Question 4.
Please see Barton Willmore Covering Letter

In your opinion, is the Local Plan effective? No

Please give reasons for your answer to Question 5.
Please see Barton Willmore Covering Letter

In your opinion, is the Local Plan consistent with national policy? No

Please give reasons for your answer to Question 6.
Please see Barton Willmore Covering Letter

Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound.
Please see Barton Willmore Covering Letter which details the modifications we consider necessary to make the Local Plan sound

Question 8

If your representation is seeking a modification to the Local Plan, do you consider it necessary to speak at the Independent Examination? Yes

If you have answered ‘yes’ to Question 8, above, please outline why you consider this to be necessary.
We are a land owner with a draft allocation within the Local Plan
Planning Policy Team  
Economic Regeneration  
BMBC  
PO Box 634  
Barnsley  
S70 9GG

BY EMAIL: localplanconsultation@barnsley.gov.uk

20488/A3/SG/Ifw
19th August 2016

Dear Sir/Madam

LOCAL PLAN PUBLICATION DRAFT CONSULTATION

We write on behalf of our Clients, the Church Commissioners for England (hereafter, 'the Commissioners') and welcome the opportunity to respond to the Local Plan Publication Draft consultation. The Commissioners own the land referred to within these representations at 'Land south of Darton Lane, Staincross' and a site plan is attached to this letter.

We provide detailed responses in respect of some of the policies contained in the Local Plan Publication Draft, along with additional information that confirms the suitability, availability and deliverability of our Clients’ Site for housing development. We therefore strongly support the allocation of the site, as ‘AC2’ within the Publication Draft.

Background

1.0 Our Clients’ land comprises 3.7 hectares located between Darton Lane and a dismantled railway route, and is adjacent to the services and facilities available in Darton and Staincross. The site is bordered to the south by trees and hedgerows.

2.0 The Commissioners have previously promoted their land interests through the submission of written representations to the Local Plan Additional Consultation 2015, the Community Infrastructure Levy (CIL) Preliminary Draft Charging Schedule in July 2015, the Local Plan Consultation 2014 and Strategic Housing Land Availability Assessment (SHLAA) in October 2013.

3.0 This letter of representation has been prepared in response to the inclusion of our Clients’ land interest as a proposed housing allocation – Site AC2 within the Local Plan Publication Draft 2016.

Local Plan Objectives

4.0 We generally agree with the Council’s Local Plan objectives and specifically the aspiration at paragraph 2.2 to ‘widen the choice of high quality homes’ to be achieved by ‘enabling the delivery of at least 20,330 homes that provide housing for all, including affordable housing, and maintaining at least a rolling 5 year deliverable supply of new housing.’
5.0 We also support the Council’s intention to ensure that a level of housing provision that is affordable is critical to the future prosperity of the borough of Barnsley.

6.0 The delivery of the housing allocation at ‘Land south of Darton, Staincross’ will assist the Council in meeting this objective.

7.0 In addition we agree with the aspiration to support growth in the economy and note that providing the right types of housing in the right locations is critical to the Council achieving this.

The Spatial Strategy

8.0 The Settlement Hierarchy (paragraph 5.9) identifies the focus of development to Urban Barnsley which includes the settlement of Darton.

9.0 It is understood that this hierarchy is informed by the Babtie Settlement Assessment 2003 and subsequent Jacobs update in 2007 together with the changes made through adoption of the Core Strategy in 2011.

10.0 We agree with the hierarchical approach to the distribution of development in order to create sustainable communities. Given that Urban Barnsley (which includes Darton) constitutes the main retail, employment, and educational centre in the borough, and the most accessible in terms of public transport we consider the approach to be entirely appropriate. Such recognition respects Paragraph 17 Bullet Point 11 of The framework, which states that planning should:

> ‘actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be sustainable’.

11.0 Notwithstanding the above we consider it would be beneficial to update the Settlement evidence for the next plan period having regard to the passage of time since their publication.

Policy SD1 Presumption in favour of Sustainable Development

12.0 We support the inclusion of Policy SD1 within the Local Plan which seeks to ensure that planning applications that accord with an up to date Local Plan are approved without delay and where there are no relevant policies, or they are out of date, applications will be approved unless the impacts of doing so would significantly and demonstrably outweigh the benefits. The policy is considered to be in accordance with paragraph 14 of The Framework.

13.0 In addition, we are encouraged to see that the policy states that the Council will always work proactively with applicants to find solutions in order to ensure that development proposals are approved wherever possible. Again, this accords with advice set out in The Framework.

Policy H1 The Number of New Homes to be Built

14.0 Local Plan ‘Policy H1 The Number of New Homes to be Built’ seeks to achieve the completion of at least 20,900 net additional homes during the period 2014 to 2033. This amount gives an indicative annualised figure of around 1,100 homes per annum.

15.0 The Strategic Housing Market Assessment (SHMA) Update November 2014 recommends an objectively assessed housing need of around 1,100 dwellings per annum for Barnsley. This equates to a need for 20,900 net additional homes over the plan period 2014 – 2033. The
SHMA concludes that this figure would be ambitious and aspirational in addressing housing need and supporting economic growth ambitions.

16.0 In recognising that ‘Policy H1 The Number of New Homes to be Built’ seeks to achieve the completion of at least 20,900 dwellings we note that the Policy requirement accords with the conclusions drawn from the Barnsley SHMA.

17.0 We are therefore supportive of the number of homes being planned in Barnsley over the plan period.

**Policy H2 The Distribution of New Homes**

18.0 We support the location of planned housing growth at Policy H2 which reflects the settlement hierarchy and directs around 45% of the overall supply of housing to Urban Barnsley which includes Darton.

19.0 The Council’s Background Paper for Housing (2014) sets out the methodology used to calculate the indicative number of dwellings to be achieved on allocations that do not have planning permission. Typically the methodology applies a gross to net ratio of 0.8 for sites between 1 and 10 hectares and calculates capacity at 40 dwellings per hectare based on the net area.

20.0 In respect of our clients’ Site ‘AC2’ the Council (in the Appendix to the Housing Background Paper) suggest that the Site has capacity for 64 dwellings. This is based on a gross site area of 4.4 hectares being reduced by around 50% to 2.2 hectares due to ecological constraints identified in the Council’s Ecological Assessment April 2014.

21.0 Having regard to the Site’s potential to support grassland habitat it was considered that the grassland of each of the three paddocks at the Site needed to be subject to detailed survey and assessment. Hence, a full National Vegetation Classification Survey (NVC) was carried out on 7th August 2016 by The Environmental Dimension Partnership (EDP), appointed by the Commissioners.

22.0 The findings of the NVC are set out in detail below, with our comments on the allocation of Site AC2. However, in summary the survey demonstrates that the grassland in the western field is of local note and to a much smaller extent of interest than identified in the Council’s 2014 Ecological Appraisal.

23.0 In light of this information we consider there is a greater area of developable land than the Local Plan suggests. We therefore consider there is the potential for our Clients’ site to accommodate more than 64 dwellings at a density of 40 dpa. This matter is discussed in more detail below and is illustrated on the Development Strategy Plan appended.

**Site AC2 Land south of Darton, Staincross**

24.0 We are fully supportive of the allocation of our Clients’ land at Site AC2 ‘Land south of Darton Lane, Staincross’ for housing.

25.0 We consider the site specific mitigation listed within the Policy, regarding remediation at the western part of the Site, is appropriate, having regard to the existing mineshafts affecting this part of the Site. We also appreciate the need for an appropriate Archaeological Assessment to accompany proposals in order to understand the potential of the Site to include historic assets with archaeological interest. This requirement accords with paragraph 128 of The Framework.

26.0 We object to bullet point 2 of the policy (in part) which expects development at the Site to “retain species-rich grassland meadows at the west and centre of the site”.
27.0 We understand that this requirement is based on the Council’s Ecological Assessment 2014 which notes that “the site includes two species-rich meadows... so these two fields [2 and 3] should be retained” (page 933, Urban Barnsley Ecological Appraisal).

28.0 However it is notable that the Council’s Ecological Assessment was carried out from the road edge of the Site only, and in respect of the western field it was only the northern edge which was clearly visible. This assessment was also carried out some time ago in 2014.

29.0 As referred to above, a detailed botanical survey of the site has been recently completed (August 2016) by EDP in light of the Council’s assessment that Fields 2 and 3 supported grassland of botanical note.

“The detailed botanical assessment concludes that only the unimproved neutral grassland within part of Field 3 is of any botanical note at a local level” (paragraph 4.9 of EDP’s Ecological Appraisal).

30.0 Consequently the survey demonstrates that it is the grassland in the western field only which is of local note and to a much smaller extent of interest than identified in the Council’s Ecological Assessment. We consider that EDP’s Ecological Appraisal of the Site is more robust on the basis that the Ecologist entered the Site for detailed assessment and this was carried out very recently at the beginning of August. Full details of the NVC survey and its findings are included in the Ecological Appraisal appended to this letter.

31.0 In recognising the limited extent of grassland interest at the Site and its local note, we do not consider that the botanical interest at the Site should be considered as an in principle constraint to development subject to mitigation.

32.0 Having regard to the recommendations in the Ecological Appraisal we are of the view that it is possible to develop the Site in its entirety and compensate for the loss of the grassland habitat on a strategic basis. This approach is considered to be entirely appropriate by EDP who are fully qualified Ecologists, and acceptable in planning policy terms having regard to paragraph 118 of The NPPF and the Council’s proposed Policy BIO1 Biodiversity and Geodiversity which states that “development which may harm a biodiversity or geological feature or habitat... will not be permitted unless effective mitigation and compensatory measures can be ensured” (bullet point 4).

33.0 We recognise the overarching need for housing across Barnsley is high and believe that our Clients’ Site would make a valuable contribution to delivering housing on a sustainable and deliverable Site.

34.0 We appreciate that our suggested approach has not been informed by dialogue with the Council and would welcome the opportunity to discuss this with a view to providing financial contributions, secured by a S106 agreement to adequately compensate for the loss of habitat on a strategic basis.

35.0 The Development Strategy Plan, appended to this letter has been informed by this approach, which if accepted could deliver more homes than are being proposed by the Council. At a density of 40 dph the Site can successfully deliver 90 dwellings. In respect of lower densities, at 35 and 30 dph, the Site could deliver 79 and 66 dwellings respectively.

36.0 For the reasons above, in light of more up to date evidence, we do not agree that the grassland meadows at the west and centre of the Site need to be retained. We suggest that the wording in the Policy be revised to account for this. We therefore recommend that the first part of bullet point 2 is removed and replaced with the following:

- “Compensate for the loss of the grassland habitat on the western part of the Site, to be informed by an up to date National Vegetation Classification Survey”.

37.0 Given the ability of the Site to deliver more than 64 dwellings, if our approach is agreed, we consider that the title of the draft Site Allocation should be amended to increase the indicative number of dwellings from 64 to 90. We suggest the wording of the draft allocation be revised to read:

“Site AC2 Land south of Darton Lane, Staincross Indicative number of dwellings 90”.

Policy H7 Housing Mix and Efficient Use of Land

38.0 We are generally supportive of this policy in so much that it expects housing proposals to deliver a mix of house size, type and tenure.

39.0 However the Policy is not clear whether all homes, or a percentage of housing proposals ‘must be suitable for different types of households and be capable of being adapted to meet the changing needs of the population’.

40.0 We recognise that some residents may wish to remain and adapt homes to meet different arising needs, however this will not be the case for all residents. Therefore we would agree that a percentage of new housing development should be adaptable and achieve standards such as Lifetime Homes, but it would be unduly onerous to require a 100% provision.

41.0 We consider clarity is required in respect of this point.

42.0 In terms of density we broadly agree with the principle that housing proposals should make best use of land.

Policy H8 Affordable Housing

43.0 We are generally supportive of this policy which seeks to increase the provision of affordable homes across the Borough. We agree fully with the recognition that the overall requirement for affordable housing can be reduced, if necessary, on the basis of viability. We believe that this recognition will assist in the deliverability of development across the Borough.

44.0 The Policy is unclear as to whether 20% affordable housing provision is required on-site or off-site. We consider the wording of the Policy should be revised to provide clarity on this point.

Green Belt Review (para. 3.24-3.28 of the Local Plan Publication Draft 2016)

45.0 We support the suggested realignment of the Green Belt Boundary for Site AC2 Land south of Darton Lane, which proposed that this is taken out of the Green Belt.

46.0 As set out in the Green Belt Background Paper we understand that the identified housing capacity within the settlement boundaries of Barnsley and the Principal Towns, which are considered to be deliverable, do not meet the Council’s OAHN of 20,900 dwellings. Consequently there is not enough capacity outside of the Green Belt to accommodate housing and employment development to meet the objective assessed needs of the Borough.

47.0 Owing to this we are fully supportive of the need to release land, via a review of Green Belt boundaries to meet the objectively assessed needs for housing in full.

48.0 For the reasons above we consider there are exceptional circumstances to justify altering the Green Belt Boundaries in accordance with paragraph 83 of The Framework.

49.0 In respect of our Clients’ Site we note that the Barnsley Green Belt Review (Darton and Mapplewell), August 2014 considered the Site suitable for release from the Green Belt stating the following:
“Green Belt at this location does not perform a function in safeguarding the countryside from encroachment and release of land at this location could assist in the urban regeneration of Urban Barnsley.” (paragraph 8.2.2)

"Release of this land parcel from the Green Belt [the Site] provides the opportunity to strengthen the existing Green Belt boundary by utilising the existing built form to the east and west, and the dismantled railway line to the south. This newly defined Green Belt boundary could create a more permanent, defensible boundary which is likely to endure beyond the lifetime of the Local Plan". (paragraph 8.2.3)

50.0 We agree with the assessment of the Site against the purposes of the Green Belt and the opportunities to create a more permanent, defensible boundary along the boundaries of the Site. Having regard to the Site's location within Urban Barnsley, we believe that release of our Client's Site from the Green Belt supports a sustainable pattern of development that accords with the settlement hierarchy.

Sustainability Appraisal – Housing Site Selection Methodology

51.0 The Local Plan Sustainability Appraisal Publication 2016 assesses Site AC2 ‘Land South of Darton Road’ for its potential for housing. Appendix E of the assessment, (dated 24th June 2016) appraises the Site’s sustainability, availability, suitability and achievability for development.

52.0 We support the positive comments made in regard to the sustainability of the Site which includes the following:

- Benefits from excellent transport connection i.e. availability of rail and bus within walking distance
- Close proximity to essential facilities and services and within 0.8k of town or district centre.
- No constraints in terms of historical, air quality or flooding designations
- No bad neighbour constraints

53.0 However we consider there to be various scorings within the Appraisal which do not accurately reflect the potential of the site for housing in respect of:

- Transport
- Access infrastructure
- Ground condition
- Biodiversity
- Landscape sensitivity
- Landscape Capacity

54.0 We therefore take this opportunity to clarify why the Site should achieve higher individual scores in relation to the above criteria, resulting in a higher overall score.

Transport

55.0 Within the Housing Site Assessment for the Site under criteria topic Transport: Proximity to strategic highway network, the Site has been scored 1, which indicates that the site is over 1.6km from the strategic road network. We do not agree with this position and therefore we would like to take this opportunity to confirm that the Site is located directly adjacent to Darton Lane which constitutes a Local Strategic Highway on the Policy Map accompanying the Local Plan Publication Draft.

56.0 We also note that the Site previously scored 5 points in the 2015 Housing Site assessment in this respect indicating that the Site was within 0.8km of the strategic road network.
57.0 We consider there must be an error in respect of the scoring relating to this criteria and strongly recommend this be amended to reflect an accurate assessment of the site.

**Access Infrastructure**

58.0 The Site, under the criteria topic ‘Access Infrastructure’ has scored 1 out of a possible 5 points. Whilst we acknowledge that to score 5 points, it needs to be demonstrated that extensive new infrastructure is not required, we consider the provision of two new access points shown on the attached Development Strategy Plan should not be considered ‘extensive new infrastructure’.

59.0 The Commissioners position is to provide two access points for the Site. This has been informed by a Highways Engineer who has confirmed that the Site can be accessed appropriately at these points. We therefore consider it appropriate to re-score the Site with 3 points recognising that ‘some’ new access infrastructure is required.

**Ground Conditions**

60.0 Within the Housing Site Assessment, the Site has been scored 1 point due to the expectation that treatment and/or remediation is to be required. This scoring is inconsistent with Peter Brett Associates (PBA) assessment carried out to inform the SHLAA October 2013, which states that treatment is not expected to be required on all of the Site.

61.0 In light of PBA’s assessment we consider it is appropriate to re-score the Site 5 points to reflect the fact that treatment/remediation is not expected on the majority of the site.

**Biodiversity**

62.0 As referred to above, the Site has been subject to an Ecological Appraisal, prepared by EDP, dated August 2016.

63.0 The Ecological Appraisal demonstrates that there are no ‘in principle’ constraints to development at the Site. Whilst there is the presence of locally notable grassland in part of Field 3, given the extent and level of the grassland, we are confident that compensation can adequately mitigate the impact of the proposed development. This approach is accepted in emerging Policy BIO1 of the Local Plan Publication Draft 2016 and under the provisions of The Framework.

64.0 It should be noted that the Site is not subject to any environmental designations such as; Sites of Special Scientific Interest (SSSI), Special Areas of Conservation (SAC), Special Protection Area (SPA) or a Ramsar Site, as confirmed by the mapping tool, Magic Map. Therefore the scoring within the Appraisal should be revised more positively.

**Landscape Sensitivity and Capacity**

65.0 Within the Housing Site Assessment, the Site has scored 3 out of 5 points for landscape sensitivity, which is defined as the degree to which a landscape can accommodate change without adverse effects on its character.

66.0 A Landscape and Visual Appraisal and Green Belt Review was undertaken by Barton Willmore in December 2015 (N.B. Prior to the Local Plan Publication Draft) to assess the Site’s contribution to the Green Belt and its landscape sensitivity and capacity. Having regard to Section 4 and paragraph 8.4 of the LVA, in respect of the Site’s landscape sensitivity and landscape capacity, we consider the scoring of the Site to be unreasonable on the basis that the Site is considered to be:

- In a well enclosed position in relation to the wider landscape due to its low lying position and proximity to established vegetation along the dismantled railway
• Already influenced by urban features and has an urban fringe character and that in relation to the extent of the D1: North East Barnsley Settled Arable Slopes Landscape Character Area the Site represents a very minor part of this

• Located between residential properties and the southern edge of part of Darton

67.0 Owing to the above points, it is considered that in relation to the Site, the landscape sensitivity is low, and residential development would not result in adverse effects to the characters of the D1: North East Barnsley Settled Arable Slopes Landscape Character Area.

68.0 Therefore, we consider it appropriate to amend the Site scoring in terms of landscape sensitivity to 5 points.

69.0 With respect to landscape capacity which is the judgement about the amount of development that can be accommodated within a site, the Site has scored 3 out of 5 points, giving it a medium landscape capacity. The LVA, within paragraph 8.5, indicates that this scoring is unreasonable, which is attributed to the overall open character of the Site, and that it is not covered by any landscape designations and/or encompasses any ancient woodland or TPOs.

70.0 The Development Strategy Plan for the Site illustrates how development at the Site would be offset from the existing vegetation bordering the dismantled railway and how the layout incorporates new green infrastructure linkages and public open space.

71.0 The results of the Site Appraisal within Section 4 of the LVA indicate that the capacity for development is high, therefore the Housing Site Assessment should be amended to reflect a score of 5.

72.0 Making these changes to the Appraisal would align the proposed allocation of AC2 more closely with the evidence base and correct existing errors.

**Land south of Darton Lane: Summary of Site Deliverability**

73.0 The technical team appointed by the Commissioners have been gathering baseline information in support of developing a housing proposal for the site. This work has informed the preparation of a Constraints and Opportunities Plan, and a Development Strategy Plan that has been enclosed. The key findings are summarised below, and present an overall position in terms of confirming the deliverability of the site; in terms of it being suitable and development being achievable.

**Suitability of location**

74.0 The Site is located in Urban Barnsley and surrounded by development to the east, west and north. The southern boundary of the Site comprises a dismantled railway line which represents a permanent and defensible boundary. The Site has been identified for release from the Green Belt on the basis that it does not perform a function in safeguarding the countryside from encroachment.

75.0 Having regard to its location we consider that development of the Site would assist in the urban regeneration of Urban Barnsley. The Site clearly benefits from excellent transport connections with the availability of rail and bus services within walking distance. There are five bus stops located near to the Site, with three of these along the Site’s frontage. There are a number of public rights of way close to the Site which provide opportunities for walking. The Development Strategy Plan illustrates how the Site will be developed to connect to the walking routes that exist along the dismantled railway line.

76.0 The Dearne Way national walking trail passes along the northern boundary of the site providing a riverside walk through Yorkshire.
77.0 The Site is located in close proximity to essential facilities and services at Mapplewell which is located within 0.8 miles of the Site. The Primary school is sited immediately west of the Site, Darton College is nearby at Kexborough (1.7 miles), and there are employment opportunities available nearby at Darton Business Park and Mapplewell.

**Site Access**

78.0 The site is served by Darton Lane which provides the necessary opportunity for access to the Site, without the need for wider strategic investment. The Development Strategy Plan indicates the provision of two new access points at either end of the Site.

**Environmental Considerations**

79.0 The southern boundary of the Site contains existing vegetation which will be retained and reinforced in part with additional landscaping to create a visually appealing environment and soft edge to the countryside to the south.

80.0 As explored in more detail above, the Site would sit comfortable in the landscape owing to its enclosed position in relation to the wider landscape. It is also already influenced by urban features and has an urban fringe character.

81.0 The site is within Flood Zone 1 and the developable site area is therefore at very low risk from flooding by rivers. We append Drainage Strategy plans which demonstrate how drainage at the Site can be successfully accommodated. A site specific Flood Risk Assessment has been completed and is available on request. Assuming the site will be allocated this will be presented at the application submission stage.

82.0 There are no constraints to development relating to landscape designations of local or national importance. The Site is also not subject to any environmental designations such as; Sites of Special Scientific Interest (SSSI), Special Areas of Conservation (SAC), Special Protection Area (SPA) or a Ramsar Site.

83.0 The Ecological Appraisal demonstrates that there are no ‘in principle’ constraints to development at the Site. Whilst there is the presence of locally notable grassland at part of the Site we are confident that the loss of this can be adequately compensated for in agreement with the Council.

84.0 There are no heritage constraints to development at the Site. Whilst the nearest Listed Building ‘Three Oaks Farm’ is located within 0.16km of the Site off Oaks Wood Drive the building is already surrounded by residential development on all sides. Good quality residential development at our Site will not adversely impact on the setting of the Listed Building.

**Available**

85.0 The Site is available now with the Commissioners keen to promote the land through the development plan process and to agree with the Council a programme for bringing the land forward for development.

**Achievable**

86.0 A residential scheme at the Site is capable of being achieved within the first five years of the Plan Period. As demonstrated above, technical work has already commenced and this will form part of the formal application submission.

**Conclusions**

87.0 Our Client’s Site represents a sustainable location to meet Barnsley’s housing need in a manner which would be in keeping with the landscape and visual character of the area. Please do not hesitate to contact me for further information.
Yours faithfully

JOANNE RUSSELL  
Director

Enc.  

1. Site Boundary Plan (RG-M-01 Rev A)  
2. Constraints Plan (RG-M-03 Rev C)  
3. Development Strategy Plan (RG-M-AI02 Rev A)  
4. Ecological Appraisal (EDP 2016)  
5. Landscape and Visual Appraisal (Barton Willmore 2015)  
6. Drainage Strategy Plans (Travis Baker 2016. Drawing no’s. 16081 01 and 16081 02)
Comment

Consultee: Mr Ian Smith (21756)

Email Address: Historic England

Company / Organisation: Historic England

Address:

Event Name: Local Plan Publication Sustainability Appraisal 2016

Comment by: Historic England (Mr Ian Smith)

Comment ID: 11

Response Date: 04/08/16 11:22

Consultation Point: Local Plan Publication Sustainability Appraisal 2016 (View)

Status: Processed

Submission Type: Email

Version: 0.2

Files: Smith, Ian, English Heritage attachment 2.pdf

Do you consider that the Local Plan is legally compliant?

Do you consider the Local Plan is compliant with the Duty to Cooperate?

In your opinion, is the Local Plan positively prepared?

In your opinion, is the Local Plan justified?

Question not specified

Please give reasons for your answer to Question 4.
See attached comments

In your opinion, is the Local Plan effective?

In your opinion, is the Local Plan consistent with national policy?

Question 8

If your representation is seeking a modification to the Local Plan, do you consider it necessary to speak at the Independent Examination?
04 August 2016

Dear Sirs,

re: Barnsley Local Plan – Publication Draft Sustainability Appraisal

Thank you for consulting Historic England about the above document.

On the whole, we would broadly concur with the assessment of the likely significant effects which the Policies and proposals of this latest consultation on the Local Plan might have upon Barnsley’s heritage assets and, where an adverse effect has been identified, endorse the mitigation measures which have been put forward.

However, the approach used in this Appraisal does makes it extremely difficult to ascertain precisely what significant effects the development of the proposed allocations are likely to have against each of the SA Objectives. In terms of the historic environment, for example, Sites RSV1 and H73 appear likely to result in considerable harm to designated heritage assets within their vicinity. Unfortunately, it is difficult to ascertain how significant the SA considers this these effects to be against SA Objective 18.

Similarly, the Heritage Impact Assessment has identified that a number of sites would harm elements which contribute to the significance of heritage assets in their vicinity and, accordingly, have suggested a variety of different mitigation measures. It would have been helpful to have the SA evaluate to what extent the proposed mitigation measures suggested (and incorporated into this latest iteration of the Plan) have reduced the severity of the original impact upon SA Objective 18.

Historic England strongly advises that the Council’s Conservation Section and the archaeological staff at SYAS are closely involved throughout the preparation of the SA of the plan. They are best placed to advise on; local historic environment issues and priorities, including access to data held in the HER (formerly SMR); how the policy or proposal can be tailored to minimise potential adverse impacts on the historic environment; the nature and
design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of historic assets.

Finally, we should like to stress that this opinion is based on the information provided by you with your e-mail dated on June 2016. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals which may subsequently arise (either as a result of this consultation or in later versions of the Plan) where we consider that, despite the SA/SEA, these would have an adverse effect upon the historic environment.

If you have any queries about this matter or would like to discuss anything further, please do not hesitate to contact me.

Yours faithfully,

Ian Smith
Historic Environment Planning Adviser (Yorkshire)