Objection to the Local Plan Publication Draft 2016 made by Residents of the Hoyland and Birdwell Areas

For the attention of both Barnsley Council, as part of the final Local Plan consultation, and the Inspectorate of Planning undertaking a review of the Barnsley Local Plan

May 2017

Please note that this document should be reviewed in colour print

The SaveHoylandCommon Group has collected over 400 signatures on petitions during the course of the consultations and has held numerous community meetings and drop in sessions. For this reason we request that this Group is permitted a representative at the Examination of the Local Plan stage.
**Contents**

<table>
<thead>
<tr>
<th>Section</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>PURPOSE OF THIS DOCUMENT</td>
<td>3</td>
</tr>
<tr>
<td>SCOPE</td>
<td>3</td>
</tr>
<tr>
<td>EXECUTIVE SUMMARY</td>
<td>4</td>
</tr>
<tr>
<td>POLLUTION</td>
<td>5</td>
</tr>
<tr>
<td>EXTENT OF DEVELOPMENT</td>
<td>6</td>
</tr>
<tr>
<td>TRAFFIC AND CONGESTION</td>
<td>9</td>
</tr>
<tr>
<td>IMPACT ON LOCAL FACILITIES AND AMENITIES</td>
<td>10</td>
</tr>
<tr>
<td>MANAGEMENT OF THE CONSULTATION PROCESS</td>
<td>11</td>
</tr>
<tr>
<td>CONCLUSION</td>
<td>12</td>
</tr>
<tr>
<td>APPENDIX 1 – PETITION AGAINST THE LOCAL PLAN PUBLICATION VERSION</td>
<td>13</td>
</tr>
</tbody>
</table>
PURPOSE OF THIS DOCUMENT

This paper has been prepared by the **Savehoylandcommon Group** ("the Group") - a number of local residents representing both the Hoyland and Birdwell areas.

It should be noted that the two areas are widely recognised as separate and distinct settlements with their own character. We firmly believe that these two areas have been combined for the purpose of the Barnsley Local Plan Publication Draft 2016 (the “Local Plan”) in order to circumvent any arguments that two settlements cannot be merged under generally recognised planning rules. However, we have submitted a joint response in order to follow the format of the Local Plan.

Both the Planning Inspectorate and Barnsley Council ("BMBC") are the intended recipients of this report which has been drafted to summarise the main points which the Group believe affect the Hoyland and Birdwell areas based on the proposed Local Plan Publication Draft 2016. However, it is noted that there are number of additional objections raised by local residents which have been submitted under independent submissions and this report is **not intended to be read instead** of those comments but to be read in conjunction with them.

**SCOPE**

The comments within this paper relate to the following land allocations within the Local Plan Publication Draft 2016 presented for consultation:

**Proposed Residential (Housing) Allocation**

AC29, AC30, AC31, H2, H4, H6, H7, H8, H9, H16, H45, H77 & 887,

**Proposed Employment Allocation**

HOY1, HOY2, HOY3, HOY4, HOY5, HOY6 & HOY7

**Proposed Safeguarded Land Allocation**

AC33, SAF7 & H79
EXECUTIVE SUMMARY

The main objections which the Group have in relation to the Local Plan are:

- Nitrogen Dioxide levels are currently in excess of permitted EU levels and additional employment land and residential land would only act to increase the health and pollution impact. Independent meter readings have been taken for a period of 12 months and the findings are set out later in this document;
- Under the Local Plan, a new boundary has been designated by the planning department incorporating Hoyland and Birdwell as a single settlement. These have always been widely recognised as separate and distinct settlements which, based on the Government NPPF publication, should not be adjoined/merged through development. We firmly believe that these two areas have been combined for the purpose of the Local Plan in order to circumvent this argument;
- The Local Plan would lead to no accessible green space in the local community whatsoever (the only green spaces remaining in Hoyland Common are one small public football field and a cemetery);
- A disproportionate amount of the target housing and employment land is allocated within the Hoyland and Birdwell area (a massive 11% of the total development for Barnsley is being suffered by this area - which is actually a very small area). This will not only change the character of the local community but also negatively impact upon amenities such as schools, medical centres and recreational facilities (which are already under resourced);
- Traffic levels and congestion are already a significant problem in the area. An independent survey found the A61 through Birdwell towards the Junction 36 M1 roundabout (“Junction 36”) was the second worst road in the UK for delays. The “improvements” at Junction 36 will assist with traffic and congestion only in some locations (and not, for example, at Allots Corner);
- Barnsley as a whole appears to be marketing itself as a commuter town for Leeds and Sheffield, with Junction 36 (the Hoyland and Birdwell area) being treated as a significant artery to the M1. This policy does not correlate to the traffic and green agendas promoted by the NPPF. Furthermore, local people are not in favour of this development as there is little demand for housing locally. The Group, and local residents, consider that Sheffield and Leeds should provide for their own expansion needs; and
- Fundamentally, the consultation process has not been conducted on a basis by which any reasonable person would consider a consultation to take place. It has been people within the above Group who have brought the Local Plan process to the attention of the local community and have experience resistance from the Council when raising concerns at each stage of the consultation.

These points are further explained below.
POLLUTION

Nitrogen Dioxide levels within Hoyland Common are already in breach of EU Regulations

- The Group has engaged an independent pollution monitoring service which has established that areas within the Hoyland Common area are currently in excess of 40mg per cubic meter i.e. the European limits for Nitrogen Dioxide emissions (data supplied by the East End Quality of Life Initiative).
- The graph below illustrates the readings of one of the test areas which is adjacent to the local primary school (over a 12 month period). The results were in excess of 40mg/m in 9 of the 12 months.

BMBC has designated a number of areas of poor air quality as AQMA’s (Air Quality Management Areas). The M1 corridor running past Birdwell roundabout (Junction 36) is already designated AQMA1, an acknowledged pollution hotspot by BMBC.

BMBC have elected not to recently monitor PM10 particles in either the Birdwell or Hoyland settlements which we do not believe is appropriate given the intention of the Local Plan and the development plans at Junction 36.

The Local Plan does not take account the effect of increased traffic levels travelling through Birdwell and Hoyland Common on already heavily congested roads, with slow moving and stationary traffic at peak
times causing an inevitable increase in vehicle emissions. Note this will be further impacted by additional
development in areas such as Goldthorpe which will also be serviced by the Dearne Valley Parkway
leading off Birdwell roundabout at Junction 36.

The Group is not aware of BMBC having undertaken any traffic flow research to examine the effect that
increased volumes, the increased risk of resident frustration or road injury or death will have on Hoyland
and Birdwell.

Local residents have widely expressed their view to the Group that current traffic levels are intolerable and
will significantly worsen if the proposed development proceeds. These areas (for example the cross roads
at Allots Corner) will not be relieved by the “improvements” at the Junction 36 roundabout.

The Group believes the available data and research illustrates BMBC have an absolute duty of care
towards local residents who should not be subjected to wholly unacceptable and avoidable levels of
pollution.

EXTENT OF DEVELOPMENT

Both housing and employment land allocations are disproportionately high in the Hoyland
and Birdwell areas when compared to the overall Local Plan

- Hoyland and Birdwell are bearing a disproportionate amount with 11% (the third largest housing
  allocation) of the overall housing allocation of the Local Plan. Though statistics in relation to
  employment land are not available, we believe Hoyland and Birdwell are also bearing a significant
  proportion of the employment land within the Local Plan. Taking the cumulative impact of both
  housing and employment land, this will lead to no available green space for resident to enjoy (in
  Hoyland Common, the only remaining green space will be a small public football field and a
cemetery);
- We believe BMBC have made the housing and employment decisions based purely on a desk top
  review without taking into account the real impact on the local area;
- As part of the plan, BMBC have now chosen to treat Hoyland and Birdwell as one individual
  settlement with no remaining green space to separate them. Local residents of both these
  independent settlements do not consider these two communities as being linked. The new
  boundary area has been enlarged by BMBC in order to facilitate the overall Local Plan and to
  enable the joining of the two separate settlements. We believe the existing limited green corridor
  should be protected from development at all costs and the character of these separate settlements
  respected;
- Recent statistics show that Barnsley has one of the highest levels of unused homes in the UK within
  the private sector. We do not believe that the housing target figures which BMBC are working to
  are robust or appropriate. They are aspirational not achievable. Moreover, they do not reflect local
  demand, instead they seek to fulfil a proportion of Sheffield and Leeds’ housing demand;
• Current demand for housing in the area continues to be low and there are areas where housing developments have been started but not completed due to lack of demand;

• We note the BMBC’s strategy is to significantly increase the amount of employment land whilst there remains a large number of unused warehouses. Similar employment targets have been set in the past by BMBC and have never been achieved and yet the housing allocations within the Local Plan are based on a forecast that a large number of jobs will be created;

• Further development will create a commuter belt for Sheffield, Leeds and Wakefield, increasing congestion and pollution which if fundamentally against the NPPF; and

• The maps below illustrate that impact the BMBC approach has been had on the open spaces within and around the Hoyland and Birdwell areas which appears to have been to identify all available land close to Junction 36 and designate it as development land, be that housing or employment land.

The maps are taken from the BMBC website along with the legend below
As is evident from these maps, no green space whatsoever will remain in the Hoyland area.
TRAFFIC AND CONGESTION

Traffic is already at unacceptably high levels, congestion is constant and impacts pollution and the safety of residents. Based on data from the Department of Transport, an independent survey carried out by Barnsley Chronical, found the A61 through Birdwell towards the Junction 36 M1 roundabout was the second worst road in the UK for delays.

- There is currently very significant congestion in both Hoyland Common (in particular, Allots Corner) and the main A61 Sheffield/Barnsley road within Birdwell;
- The level of pollution associated with traffic in the area is already very high (see above under “Pollution”);
- The increased levels of commercial and residential traffic which will be directed through both Hoyland and Birdwell given the amount of employment and housing land assigned to both areas will have a catastrophic impact on the traffic situation, resulting in a deterioration to local residents’ quality of life; and
- Living and working locally will become intolerable at peak hours.

The new highways infrastructure and reconfiguration at Junction 36 may alleviate congestion to a point on the transport corridor, however principal towns are poorly served and therefore inevitably will increase traffic at Junction 36.

Adding in the target of 30,000 new jobs and 20,000 new homes in the Barnsley area (targets that we fundamentally believe are not achievable given demographics etc.) will impact significantly on the overstretched road network.

The key objective of the Local Plan is to reduce the impact of climate change and the impact of transportation related to greenhouse gas emissions.

The Local Plan fails to promote sustainability in the following areas:

- Removing green and recreational spaces.
- Replacing it with Industrialisation and urban development on a scale that is neither warranted nor justified and which our current Infrastructure already struggles.

On this basis, we believe that based on our work within the Hoyland and Birdwell areas the Local Plan is not justified, sound or positively prepared.
IMPACT ON LOCAL FACILITIES AND AMENITIES

*Amenities are already stretched in the area and the proposed development will strain them further*

The current draft Local Plan does not take into account the impact on local services as a direct result of an increase in population. Including:

- Increase in required hospital health care provision;
- Increase in GP care provision;
- Lack of schools and education facilities;
- Increase on emergency fire & rescue services;
- Loss of green space for recreation, health and wellbeing;
- Increase in refuse and recycling provision;
- Increase in local public transport requirements;
- Loss of sporting and social amenities for local people;
- Increase in crime from a direct increase in population;
- Increase in the social services provision;
- Decrease in community cohesion; and
- Lack of amenities like post offices.

The above bullet points are the main concerns of local residents, though not exhaustive, in respect of the impact on local amenities which are already negatively impacted by population size. It should be noted that school places and GP appointments are already a significant issue in the area with local residents waiting over a week to see a GP and one local resident having to take his three children to three separate schools.

Local Government need to be made accountable for the increase in population as a direct result of addressing housing strategies, furthermore this must include the positive impact of commissioning on the health and wellbeing of their local populations. The interdependence between housing, health and social care in promoting well-being, e.g. links between supported housing and physical and mental health or homelessness and ill health, and the benefits of early prevention over costly late intervention. We do not consider this to be achievable if the Local Plan is adopted as it is currently written.

The provision of public services such as health care, education, sanitation and criminal justice—is a key task for government. People care about public services and depend on them being delivered well. Public services provide the most common interface between people and the state, and their functioning shapes people’s sense of trust in and expectations of government. At a national level, public services underpin human welfare and economic growth.

The proposed development of site HOY1, not only removes green space from the current Rockingham Centre, but also land currently under agricultural and mixed amenity use bordered by the M1 and A61 down to Parkside Farm.

For the reasons stated above the residents of the Hoyland and Birdwell areas believe the Local Plan Publication Draft 2016 has not been soundly prepared in respect to these localities.
MANAGEMENT OF THE CONSULTATION PROCESS

Local residents have expressed their disgust at the management of the consultation process which has only been brought to their attention through the efforts of the Group. A significant number of local people are still unaware of the plans.

- We believe BMBC has failed in their duty to consult local residents fairly;
- The Local Plan has been insufficiently communicated, there has been negligible engagement by BMBC and information has not been readily accessible. Even those documents which people are aware exist are very difficult to locate on the BMBC website;
- Based on the Group’s interaction with local residents, it is clear that any responses to the Local Plan are due to the activities of the Group and not through direct/targeted engagement and notification by BMBC. For this reason, we believe the consultation has been ineffective;
- The way in which development sites have been assigned and changed throughout the consultation has led to local notices only showing a fraction of a total development, which is wholly misleading. For example, a site which was originally shown as one site was later broken down into a larger number of sites meaning the headline number of houses per any single site was lower. Local residents were also asked to comment on each site separately, this, in practice, was impossible;
- At one council led session we witnessed 2 people being provided with deliberately misleading information; and
- Even during the final consultation phase (July 2016), the Group took a stand at a local gala at which over 260 residents signed a petition (Appendix 1). All commented that they were, even at this stage of the consultation, unaware of the Local Plan. This is just one of many such examples.

The Department of Communities and Local Government sets out the structure for consultation on the Local Plan through the NPPF. At a local level, the Community Involvement Statement should ensure local people have a say on key decisions affecting their local areas.

The first consultation in respect of the Local Plan in Barnsley was between 10 November 2014 and 16 January 2015. The consultation website was not user friendly and the online portal had not been adequately maintained.

The consultation/BMBC website is not a user friendly system and many residents struggled to find and navigate the consultation portal, indeed even those who are computer literate and were aware of the links on the site still found it difficult to locate the relevant information on which to form an opinion or to be able to respond to any consultation. Advertisement of the consultation was limited and many residents simply couldn’t submit their comments. The harder to reach, and non-computer literate, members of the community were disenfranchised by this limited method of consultation.

Additional consultation was carried out for a period from 30 October 2015 until 11 December 2015. This consultation was, following complaints in respect of the first consultation, organised slightly better given drop in sessions were arranged throughout the Borough. However, it was very disappointing that this stage
of the consultation focused solely on additional sites within the plan. Many residents were disappointed that they could not have their say on the original sites, having only becoming aware after the first consultation ended (through the efforts of the Group not BMBC). They have been left feeling that their right to have their say has been denied. In addition, the Group visited the drop in sessions and were very disappointed that any reference to the whole plan (all sites) were not openly referred to by the planning officers until challenged and the site references at this stage had been changed from the first stage leading to significant confusion.

The final consultation period between 24 June 2016 and 19 August 2016 is intended to only be open to comments on key legal factors of soundness. Again many residents who have not been able to comment on the Local Plan due to the restrictions put in place in the first round of consultation are now left without a say. Similarly, the wording of the final consultation is unlikely to be misunderstood by the layman and, in our view, is structured to either discourage people from seeking to make any type of comment or to lead respondents into making comments which are discountable by BMBC based on “the rules” (rules set by BMBC) of what people are entitled to comment upon.

For these reasons, we believe that based on our work within the Hoyland and Birdwell areas that BMBC has breached their duty to consult effectively and that the Local Plan is not justified, sound or positively prepared.

**CONCLUSION**

Based on our work within the Hoyland and Birdwell areas and conversations with a huge number of local residents we believe that the Local Plan is not justified, legal, sound or positively prepared.

This is not a “local plan for local people”, there is very little demand for housing locally and this can be demonstrated by the empty homes statistics, development sites recently abandoned as the homes didn’t sell and empty warehousing sites. The proposed development will have a catastrophic impact on the lives of local people in order to aid neighbouring cities of Sheffield and Leeds.

The infrastructure simply cannot cope with what is being proposed. Services are already strained and traffic levels are intolerable. Pollution levels are already cause for concern.

The development allocation is disproportionate and we ask that the plan is rejected and reviewed.
We the undersigned, residents of the separate Hoyland and Birdwell settlements, which have now been designated as the “Principle Town of Hoyland” by Barnsley Council, strongly object to the current proposals within the Barnsley Local Plan presented in June, July and August 2016. We call upon the council to:

1. Reject this plan
2. Accept that the consultation process to date has not been conducted appropriately as residents have not been properly communicated with or made aware of the proposed introduction of the plan; and
3. Engages with the local residents to agree acceptable Local Plan to benefit local residents and the people of Barnsley

For reasons of personal data protection contact details of the signatories have been redacted in this submission. The original hard copy is available on request.