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Dear Paula,

Barnsley Local Development Framework – Core Strategy (Revised Preferred Options) Consultation

The Regional Planning Body (RPB) welcomes the opportunity to comment on the Barnsley Core Strategy – Revised Preferred Options document and to continue its involvement in the development of a coherent spatial planning framework for the region. The comments offered in this letter are intended to be within the spirit of continued and productive joint working.

At this stage, the RPB's response to the consultation document is a set of comments aimed at highlighting where issues related to general conformity with the Regional Spatial Strategy might arise. When the DPD is published prior to being submitted to the Secretary of State a formal RPB view on its general conformity with the Regional Spatial Strategy will need to be requested (Regulation 29, 2008).

As we discussed on the phone, we have purposefully kept our comments brief at this stage. We thought that it would be most helpful to give you the 'headlines' of our comments and then to meet with you to discuss them in more detail. After that, we will be able to provide more detailed written comments if that would be helpful.

To that end, I look forward to meeting you and Alice with my colleague Martin Elliot when we come to your offices on Monday 7th September at 2pm as arranged.

The Yorkshire and Humber Plan

Our comments are made in relation to the current RSS – The Yorkshire and Humber Plan, which was issued by the Secretary of State in May 2008. The Yorkshire and

Humber Plan aims to achieve a more sustainable pattern and form of development, investment and activity across the region, putting a greater emphasis on matching needs across the region with opportunities and managing the environment as a key resource. There is a particular emphasis on achieving the regeneration and renaissance of the region's city and town centres by making them the focus for housing, employment, shopping, leisure, education, health and cultural activities and facilities in the region.

Previous comments

We previously commented on the Preferred Options document in 2005. This was a substantially different document but at the time we highlighted what we saw as a lack of a strategic context, raised points over the distribution of housing in smaller settlements, pointed out the need for the transport section to have more on implementation and suggested that it would be helpful to have more information on the phasing of development delivery.

As you will be aware these comments were made in relation to the then current Regional Spatial Strategy (based on the selective review of RPG12 issued in December 2004) and the draft Regional Spatial Strategy – the Yorkshire and Humber Plan (December 2005).

Key Points on the Core Strategy: Summer Consultation

Your draft Core Strategy seeks to address a great deal of issues and reflects the challenges that Barnsley faces in planning for a sustainable future.

You rightly point out that the RSS is part of the statutory development plan for Barnsley and the resultant need for there to be 'general conformity' between the Core Strategy and the RSS.

However, we feel that the complexity of the spatial issues that Barnsley faces and how they could be addressed to develop sustainable patterns and forms of development that deliver regeneration and renaissance of the Borough's settlements are not fully developed in the Core Strategy. This leads us to raise three 'headline' points at this stage. Our aim is to highlight where we consider changes are needed to help ensure that the next stage of preparation leads to a more straightforward and unproblematic Examination and ultimately a sound Core Strategy.

Firstly, the main issue we recommend that you address is the lack of an explicit connection between your evidence base and the proposed policies. Whilst we acknowledge that it is a challenge to prepare a concise document that can be read and understood by a variety of audiences, it is essential that it is more transparently evidenced and that there is a more obvious technical approach to the conclusions you are reaching.

Clearly, as set out in paragraphs 4.36 to 4.38, you have been working hard to develop an evidence base and have commissioned a variety of detailed studies. Unfortunately it is not clear in reading the Core Strategy how the outputs of this work have fed into the chosen approaches. It is also not clear how the results of consultation activities and sustainability appraisals have steered your thinking. We believe an Inspector will expect to see robust evidence of why your approaches could lead to patterns of development quite different from those envisaged in the RSS and how you have built upon (or why you have diverged from) the sub-area policies set out in the Yorkshire and Humber Plan.

Secondly, following on from the main point above, we suggest that more detail will be needed in the next iteration of the Core Strategy to clearly set out the implications of defining such a broad 'urban area' of Barnsley. Without this detail, the implications of this label for the development patterns of this part of the Borough could be misinterpreted and assumptions made about the functions of the settlements that it is proposed are included.

Thirdly, in addition to the regional and sub-regional context provided by the RSS, there are clearly a number of programmes being developed and delivered at the functional sub-regional level that are relevant to the spatial planning of Barnsley. Some of these are jointly delivered with neighbouring authorities, and the context section of the draft Core Strategy reflects that Barnsley is part of two city-regions. We recognise that this creates a potentially complicated spatial planning and delivery picture. However, it is not always clear how these programmes influence the Core Policies both from a general spatial overview and from a more specific perspective ie how they impact in different ways on different parts of Barnsley.

It is not always clear what is the 'unique' role for Barnsley in these two city regions. We would consider that an Inspector, unfamiliar with the area, would find it especially difficult to relate the policy approach to functional sub-regional drivers. To that end, it might be useful to try to map or represent visually the impacts that different programmes have on different parts of the authority and how these lead to cross-boundary relationships with neighbouring local authorities and city-regions. It may be that these would be best represented on the Key Diagram, which currently only reflects cross boundary issues in relation to transport routes.

Below is a summary of the main points we think you need to consider at this stage.

1. A clear link is needed between your evidence base and your proposed policies to demonstrate how the Core Strategy policies are a local interpretation or variation on the context set by the RSS and how they will be implemented:

- a. from the SHLAA and ELR to demonstrate that the current urban area of Barnsley is 'not large enough' to accommodate proposed rates of growth (Option 1 page 24)
- b. from the SHLAA, ELR, infrastructure planning, delivery and viability work and retail assessments to show that the proposed additional Principal Towns (of Royston and Grimethorpe – Option 3 page 26) can fulfil a role more than that of a local centre – at present the retail hierarchy (pages 76 to 77) and place shaping (pages 113 to 123) sections do not provide evidence to support their proposed elevation
- c. to demonstrate how a dispersed pattern of development across the Borough (CSP3), including in proposed Principal Towns with relatively weak public transport infrastructure, will help to address climate change challenges and deliver more sustainable patterns of development
- d. to support the proposed target for the % of development on PDL given that you state that the RSS target 'may be unrealistic to achieve' (paragraph 9.5)
- e. to demonstrate how the transport policies and proposals will be implemented as they currently contain some aspirational propositions based on investment decisions that might not come to fruition from other bodies (section 9.3)

- f. from your ELR and assessment of the impact of current market conditions to demonstrate: what employment mix needs to be catered for; that you have carried out a thorough review of allocated sites; to reflect levels of 'churn' in the market; and to identify the likely need for strategic sites (section 9.4)
 - g. from your SHLAA, SHMA and viability assessment work to: demonstrate levels of housing need and its spatial distribution and therefore how the proposed distribution of housing across the settlements meets these needs; to give information on the housing mix needed to meet these needs; and to support the proposed levels of affordable housing provision of 15% of new developments (section 9.5)
 - h. to demonstrate how current housing market conditions and levels of delivery will impact on short, medium and longer term trajectories of delivery; the proposed approach of stepping down delivery towards the end of the Plan period would appear to be at odds with the likely 'under delivery' in the first few years of the Plan period coupled with continued upward pressure of household formation and the growth point expectations (see attached briefing note we have recently circulated to local authorities)
 - i. to support the proposed use of the 10% renewables figure from RSS (CSP48)
 - j. from your SFRA to support your policies on flood risk(CSP46)
2. **Clarity is needed over the implications of proposing a very broad Barnsley urban area to include existing free standing settlements** (including Darton and Dodworth – preferred option 2 page 25); for example how will development be distributed within this broadly defined area and how will this affect the functions of these settlements and possible levels of growth in the future?
3. **More detail is needed on what will be Barnsley's 'unique' role within the Leeds City Region and Sheffield City Region** – if it is to be a 'focus for growth' then the detailed spatial implications of this are crucial – reinforcing the points made above.

As I said on the phone, we are aware that there are many policy areas covered in the draft Core Strategy and that we have much more detailed comments to share with you around all of the above headlines. We therefore look forward to having an opportunity to discuss these with you in September.

Yours sincerely,



Jenny Poxon
Head of Planning Delivery

Please note: **from 1 April 2009 officers supporting the work of the Joint Regional Board, the new Regional Planning Body, work in LGYH; please amend your contact databases accordingly.**



BRIEFING: SCALE AND DISTRIBUTION OF HOUSING

Introduction

1. Since the issuing of approved RSS in May 2008 further work has been undertaken to update our understanding of the drivers of housing growth in the region. This work was initiated as part of the evidence base for the selective review of RSS – the RSS update 2009. At its meeting on the 24th April the Joint Regional Board decided not to proceed with the RSS Update and to move straight to the development of a new Integrated Regional Strategy.
2. The development of the RSS update in surfacing a range of new evidence on housing growth will have implications for the development of LDF Core Strategies and other Development Plan Documents. This briefing looks at how national and regional policy deals with emerging evidence, examines the headlines from the evidence and provides advice to local authorities on how to respond to these circumstances.
3. In addition to the matter of addressing more recent evidence a number of planning authorities have raised issues about the role of the Core Approach in the approved RSS in shaping the distribution of housing within the Plan area.

National and Regional Policy

4. PPS3 Housing sets out, in paragraphs 33 to 35, how the level of housing provision should be determined and distributed within the region. It describes the range of evidence that is needed on the drivers of housing growth and the capacity to accommodate this growth. This includes evidence from Strategic Housing Market Assessments, advice from the National Housing and Planning Advice Unit, the latest household projections and economic growth forecasts, evidence on the availability of suitable land from Strategic Housing Land Availability Assessments, the government's ambitions for affordability and a Sustainability Appraisal.
5. PPS12 Local Development Frameworks notes, in paragraphs 4.14 and 4.15, that Core Strategies should have room for manoeuvre and need not be updated simply because there has been a change in the housing numbers in the RSS. The guidance advises that this can be achieved by local authorities considering the implications of different levels of development taking place
6. Approved RSS sets out a scale and broad distribution of housing provision in policy H1 Provision and distribution of housing. In policy H2 Managing and stepping up the supply and delivery of housing it sets out a flexible approach that does not treat the figures in H1 as a ceiling whilst ensuring development is focussed on locations that deliver the Plans Core Approach and Sub area policies.
7. This national and regional policy approach both recognise that their needs to be a degree of flexibility in the supply and delivery of housing provided that the planned approach is grounded in sound evidence.

The scope and implications of more recent evidence

8. A range of new evidence has emerged since the completion of work on the approved RSS. The key pieces of evidence are the supply range advice to the region from the NHPAU, the Experian study that tested that advice and developed our understanding of how the economy drives housing growth, the University of Leeds work on migration trends that was refreshed in March 2009 and finally CLG issued the 2006 based trend household projections.
9. All the above evidence shows that household formation in the region is increasing at a greater rate than envisaged in the approved RSS. In broad terms the annual rate of increase in the region is between 27-32,000 households compared to 22,000 in approved RSS. The work carried out by Experian and the CLG trend projections include evidence on the likely rates of growth in different parts of the region. Evidence that the region has ability to deliver new housing at rates that correspond with the growth in households requires further development. The recently published report of the Enquiry into housing delivery shows that in the short to medium term (2-5years) the market is unlikely to be able to deliver the scale of provision required by the approved RSS. However the report shows that the recovery in delivery rates will vary across the region and some areas will recover more quickly. In addition it is clear that local planning policies can assist the recovery by responding to the need to reshape housing schemes to meet the current and likely future market circumstances.
10. The evidence for the scale of increase will not be fully tested and a strategy to respond to the increases will not be in place until the completion of work on the Integrated Regional Strategy. This inevitably creates significant uncertainty for the development of Plans and Strategies until the completion of the IRS. However, it is worth ensuring that any options work undertaken treats RSS housing figures as a lower option target and other drivers as higher option targets to remain in keeping with the spirit of the guidance.

Responding to and managing this uncertainty

11. The policy approach in PPS3 recognises that new evidence will become available and that the policy approach at regional and local level should be capable of recognising and responding to this.
12. The RSS provides in policy H2 an approach to managing this uncertainty through not treating the housing figures in policy H1 as ceilings whilst ensuring that development is focussed on locations that deliver the Plan's Core Approach and Sub area policies. To demonstrate this, in progressing Core Strategy, work local authorities can use the evidence from Strategic Housing Land Assessments to show how the scale and distribution of deliverable housing sites can achieve an appropriate rate of delivery with the strategic framework provided by the RSS.

Distribution between settlements

13. Policies YH4, YH5 and YH6 set out the overall priorities for directing development to the higher order settlements in the region. In discussions with a number of local authorities about the development of Core Strategies the apportionment of housing provision between the different categories of settlement has been raised. Authorities appear to be concerned that the YH policies could be seen to encourage a 'fossilising' of the current order and

relationships between settlements and disadvantaging the rural areas in the region.

- 14.** The approved RSS does stress the importance of supporting the existing roles of the higher order settlements and focussing development in these places. However it does also offer scope to identify additional Principal Towns through policy YH5 where there is compelling local evidence that justifies this. Furthermore in discussions with individual authorities we have been alert to the variety of local circumstance across the region. Where clear local evidence demonstrates the need for a particular approach we have recognised this in our responses to consultations on emerging Development Plan Documents. This can be illustrated through the contrasting outcomes of the recently adopted Core Strategies for Harrogate and Wakefield which meet the requirements of the RSS and yet have quite different approaches to the proportion of development directed to smaller settlements.

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July 2009