

27th October 2025

BMBC
Planning & Regulatory Services
P O Box 64
Barnsley
S70 9FE

Dear Jessica,

RE; Residential Development on land to the South of Doncaster Road, Darfield, Barnsley.
In joint application with Keepmoat Homes

Further to your recent email regarding comments from consultees on the above application we write to provide the following information:-

Updated Design Proposals

- SH / Da / 00-D - Site Location Plan
- 23-5638-01-P - Site Layout and Landscape - 08.10.25 Coloured
- 23-5638-10-K - Site Layout Phase 1 and 2 - 08.10.25 Coloured
- 23-5638-05-A - Site Section - 08.10.25
- 23-5638-06-A - Street scenes - 08.10.25
- SD_2503_A_ - Render - Window Details - Head & Cill – Plain
- KMH-Rut-A/O - Rutland - AS-OP
- KMH-Wat-A/O - Watergrove - AS-OP
- SH / ST / 69- A - Lime meeting M4(3)(b) standards
- SH / ST / 150 - External Door Detail Threshold and Jamb details
- SH / ST / 151 - External Window Detail and Jamb details
- E18/7309/001_01F - Engineering Feasibility Phase 1
- E18/7309/001_02F - Engineering Feasibility Phase 2
- E18/7309/001_03D - Engineering Feasibility Full Site
- PRGN-1229-HGN-DR-CH-101F - Revised Junction Arrangement - Oct 25
- PRGN-1229-HGN-DR-CH-102 - Vehicle Tracking - Oct 25
- PRGN-1229-HGN-DR-CH-103 - Off Site Highway Improvements - Oct 25
- PRGN-1229-HGN-DR-CH-104 - Proposed Speed Limit Scheme

Taking each of the plans in turn: -

Number of Dwellings

I note the total number of dwellings has been reduced by 4 dwellings to 456 dwellings, (15 dwellings above the local plan indicative number for this site), with 256 dwellings for area 1 and 200 dwellings for area 2. No plot boundaries or parking arrangements of the housing units have been provided for area 2 (the outline part of the application) so I am no further forward in giving an indication whether area 2 can contain the dwellings proposed whilst meeting the requirements of the SPD 'Design of Housing Development' (2023) and the SPD 'Parking' (2019).

Given Phase 2 is in outline form, the level of detail being requested is not appropriate. The agreed description specifies that you are to approve a "maximum" number of dwellings. As an Authority you

would be within your right to reduce this at the reserved matters stage should you feel the upper limit cannot be suitably accommodated. The level of detail on Phase 2 therefore remains as previously proposed.

Location of public open space

I appreciate that the layout for area 2 is just indicative at this stage, but I note that the reduced amount of POS now being shown proposed.

This is not accurate in respect of the Public open space. The scheme has not seen a reduction in public open space public open space provision.

The development proposes a high-quality open space to the entrance of the site, a centrally positioned LEAP which is easily accessible ensuring sufficient buffers to the surrounding dwellings in addition to the provision of smaller pocket parks. These areas provide opportunities for informal recreation, seating and socialising.

The provision of open space within Phase 1 equates to 12.8% of the site area (11.7Ha Gross, 1.5Ha POS) and this includes the usable areas of public open space only.

As you have noted, the site is one allocation and as such, should be designed in such a way that the scheme is designed holistically. In respect of Phase 2, although at outline stage only, the level of POS is significantly greater than policy at a level of 29% (Gross 7.5Ha, POS 2.2Ha). When taking to level of POS overall and as a comprehensive development, a level of 18% POS area is provided (Gross overall 19.3Ha, POS 3.7Ha).

Urban Design - Overdominance of front of dwelling parking

For area 1 we have attached a revised plan showing areas where there is an overdominance of front of dwelling parking, where I have taken this to be where they do not meet the guidance contained in the SPD 'Design of Housing Development.' This states, in section 11.4:

'The maximum number of front of dwelling parking spaces acceptable in a row is four. These should be used sparingly in a development and be separated from other parking spaces by a considerable width of soft landscaping, i.e. more than the width of a parking space.'

The point of this specified width of soft landscaping is to allow enough space for tree planting or at least significant shrub planting to break up the line of parking.

In line with the statement above, the scheme looks to avoid long stretches of car parking without the inclusion of a landscape strip. This is limited to 4 spaces as set out inline with Urban design comments.

One of the main benefits of landscaping is reducing the visual impact of cars on the street scene and many Local Authorities do specifically ask for hedges to be planted between runs of spaces for this reason. This has been achieved here. We do however appreciate the concern in respect of the widths and conflicts and therefore these hedges are included in landscape strips that are 2m or wider.

Urban Design - Visitor parking

I note that the number of visitor parking spaces for phase 1 has been increased from 30 to 53.

The visitor parking is retained on this revised site layout as noted.

Urban Design - External Spacing Standards

- External spacing standards are set in the SPD 'Design of Housing Development' in section 4.
- I have checked garden sizes on the site layout (for area 1):
- For two-bedroom dwellings the gardens should be a minimum of 50 sq. m. I have measured the following plots as undersized: plot no. 70 (35 sq.m.- corner plot), 92 (35- corner plot), 172 (40), 173 (40), 174 (45- corner plot), 221 (45), 222 (45), 247 (40), and 248 (45).
- For three-bedroom dwellings and above the gardens should be a minimum of 60 sq. m. I have measured the following plots as undersized: plot no. 115 (55 sq.m.- corner plot), 120 (55- corner plot), 135 (50), 140 (50), 191 (50), 219 (50- corner plot), 239 (50- corner plot) and 240 (55- corner plot).

A further review has been made, the layout has been revised to ensure all plots specified achieve the minimal size standards required.

Urban Design - Quad house types

Following a further review of the comments, quarter houses have been removed from the layout in their entirety. The development therefore proposes typical house type designs in this location.



Urban Design - Accessible dwellings

I note that the design and access statement states, (in section 5.5 'Amount of Development'), 'In respect of accessible buildings, 64% of dwellings comply with the M4(2) standard. Out of the 260 dwellings on Phase 1, 6% of the dwellings (16 Units) are compliant with M4(3) requirements.' Regarding M4(2) and M4(3)(2)(b) requirements, the applicant needs to ensure they state 'M4(3)(2)(b)' rather than 'M4(3)' (as under building regulations the default for M4(3) is M4(3)(2)(a), which is a lesser standard than that required in the SPD 'Design of Housing Development' (in para 6.1).

In line with the comments provided, I can confirm that the relevant labels are now included on the following:

- 23-5638-01-P - SITE LAYOUT & LANDCAPE - 08.10.25 COLOURED
- KMH-Rut-A/O - Rutland - AS-OP
- KMH-Wat-A/O - Watergrove - AS-OP
- SH / ST / 69- A - Lime meeting M4(3)(b) standards



M4(2) COMPLIANT PL-DT



M4(3)(B) COMPLIANT PL-DT

Urban Design - Typical cross section for windows and doors.

The SPD 'Design of Housing Development' states, (in para 7.11), 'Window and door openings should have sufficient recess in the reveal to give visual articulation. Typical cross sections of windows and doors at 1:5 or 1:20 scale should show a minimum 50mm set back within the reveal.'

As requested, please find attached the following details: -

- *SD_2503_A_ - Render - Window Details - Head & Cill – Plain*
- *SH / ST / 150 - External Door Detail Threshold and Jamb details*
- *SH / ST / 151 - External Window Detail and Jamb details*

These provide typical cross sections of each developer to show compliance in respect of the recess details.

Highways Development Control / Active Travel England

The resulting junction modelling is thorough, however indicates that longer queueing and increased delays will result, particularly on the A635 eastern arm and A6195 Northern Arm, although no mitigation is proposed.

The modelling has shown that the junction will operate within normal requirements therefore no migration is warranted or required.

The multi-modal person trip generation data presented in the TA has not been meaningfully integrated into the design of the site or its connectivity. The TRICS outputs indicate significant daily movements on foot, by cycle and via public transport, yet this data is only summarised narratively.

We have put forward a scheme breaking down potential off-site improvements works for pedestrian and cycling works, all works must be considered alongside the financial viability appraisal.

In line with the objectives of paragraphs 115-117 of the NPPF, LTN 1/20, and the requirements of Active Travel England, there must be a greater emphasis on supporting and enabling non-car modes through direct, safe and accessible infrastructure. The Travel Plan should also be revised to reflect these multi-modal forecasts, with clearly defined targets and actions aimed at encouraging modal shift.

We enclose a revised travel with amended targets achieving non car modes of transport.

Visibility splay dimensions are not annotated on the drawings, and it remains unclear whether the designs fully comply with the geometric and safety requirements of DMRB CD123. A completed Designer's Checklist must be submitted to confirm full compliance with CD123.

See enclosed drawing PRGN-1229-HGN-DR-CH-101F - Revised Junction Arrangement and PRGN-1229-HGN-DR-CH-102 - Vehicle Tracking with annotated visibility splay dimensions, we can also confirm the onsite access junction will be fully compliant with the designer's checklist with CD123. Confirmation will be provided regarding offsite works once an agreed works pattern is established and agreed.

Existing bus stop to the east of the access on Barnsley Road which appears to fall within the visibility splay. Any idling buses will significantly restrict visibility when egressing the site from this access and it may be necessary to relocate the stop; however annotated visibility splays will confirm this.

See enclosed drawing PRGN-1229-HGN-DR-CH-101F including revised bus stop location to avoid interference with visibility splays from new access road into the development.

A Stage 1 Road Safety Audit has not been submitted

[A complete road safety audits will be provided once principal agreements are in place for the site layout and associated off-site mitigation.](#)

Swept path analysis for an 11.4m refuse vehicle has been included in Appendix PE of the TA. The tracking for the new priority junction is a busy plan and difficult to assess

[See enclosed drawing PRGN-1229-HGN-DR-CH-102- Vehicle providing clear tracking details at large scale.](#)

Forward visibility splays shown within the internal layout extend over private garden areas.

[See enclosed site layout drawings all areas where this occurred have been updated to included wider footpath margins to ensure no forward visibility splays fall within private areas.](#)

Internally, the site layout offers good permeability but requires improvement in terms of active travel provision. Footways along Barnsley Road fall below the required 2.0m minimum in places and connections to the existing shared use path on Doncaster Road and to local facilities are poorly defined and must be strengthened. The WRAT assessment identifies that Route C to the Barnsley Road bus stops falls below acceptable thresholds due to a lack of crossings, inadequate tactile paving and vegetation overgrowth. Wider off-site mitigation appears necessary to overcome these issues.

[A scheme for offsite improvements works including footway across the site frontage including street lighting where appropriate linking to bus stops on Barnsley Road and directly to the North on Doncaster Road.](#)

[However further guidance is required from Barnsley Council/Highways separating the wish list provided by Active Travel England that encompasses all associated requirements, not necessarily the localised feasibility of requirements for Barnsley Council/Highways. Once a segregated listed is provided, we can provide budgetary figures to be included within the FVA to be considered.](#)

The Transport Assessment baseline appears reasonable, for Phase 1 it identifies around 1,909 daily person trips, of which 9% are expected on foot, 1–2% by cycle and under 3% by public transport. These proportions are broadly consistent with 2011 Census data for the Darfield & Great Houghton MSOA and South Yorkshire wide evidence which shows around 71% of trips are by car, 17% by public transport, 9% on foot and 2% by cycle. The issue however is the limited ambition shown in the Travel Plan rather than the baseline figures being significantly different to those expected.

[We enclose a revised travel with amended targets of achieving more ambitious targets of non-car modes of transport.](#)

At present the Travel Plan seeks to increase walking and cycling from 8% to 13% and public transport from 10% to 11.5% over a five-year period. Even if achieved, this would still mean three quarters of trips are being made by private car. That sits uncomfortably against the South Yorkshire Mayoral Combined Authority's Transport Strategy which aspires to 21% growth in walking, 350% growth in cycling and 18% growth in bus use by 2040, and the Government's Cycling and Walking Investment Strategy target that 50% of short urban trips should be walked or cycled by 2030. The Travel Plan targets therefore need to be revisited with a more ambitious trajectory set out, with clear milestones and remedial actions if targets are not achieved.

We enclose a revised travel with amended targets of achieving more ambitious targets of non-car modes of transport.

A significant concern in relation to access to sustainable travel, is the absence of a safe and direct route to the Doncaster Road bus stop adjacent to Strawbridges Garden Centre. This is the primary bus stop for the site, served by frequent and reliable services including the X19 which provides direct links to Barnsley town centre and onward to Doncaster. This is the route residents are most likely to use for commuting, education and shopping trips and, as such, is a stop of importance. At present, there is no continuous footway or lighting along Doncaster Road to this stop, with pedestrians having to access the stop via Barnsley Road and Saltersbrook Road, walking alongside Strawbridges Garden Centre and then routing back on Doncaster Road to the bus stop. The Walking Route Audit Tool confirms these deficiencies, with the route scoring poorly as a result. In its current state the bus stop is effectively inaccessible for many potential users, particularly those with prams, wheelchairs or mobility aids.

A scheme for offsite improvements works including footway across the site frontage including street lighting where appropriate linking to bus stops on Barnsley Road and directly to the North on Doncaster Road.

However further guidance is required from Barnsley Council/Highways separating the wish list provided by Active Travel England that encompasses all associated requirements, not necessarily the localised feasibility of requirements for Barnsley Council/Highways. Once a segregated listed is provided, we can provide budgetary figures to be included within the FVA to be considered.

It is essential that the applicant undertakes a detailed assessment for providing a safe, well-lit and direct connection via Doncaster Road to this bus stop. This must include continuous footways, improved lighting and acceptable crossing points where needed. Unless this connection is secured, the targets within the Travel Plan cannot be regarded as deliverable and it is likely that the development will develop a pattern of car dependency from day one given the remote location of the site.

A scheme for offsite improvements works including footway across the site frontage including street lighting where appropriate linking to bus stops on Barnsley Road and directly to the North on Doncaster Road. As noted above.

The Barnsley Road corridor also needs careful consideration. The WRAT audit scored the route to the bus stops at only 62.5% due to missing crossings, inadequate tactile paving and vegetation overgrowth making it an undesirable route for both pedestrians and cyclists. There is also a conflict between the eastern site access visibility splays and the existing bus stop location, which may require relocation as previously comments upon.

See enclosed drawing PRGN-1229-HGN-DR-CH-101F including revised bus stop location to avoid interference with visibility splays from new access road into the development.

The Cycle Level of Service audit undertaken on Doncaster Road shows relatively positive results, but Barnsley Road does not form part of the audit and has not been assessed despite being a key desire line. In its current condition Barnsley Road is unsuitable for cycling and should form part of the CLOs assessment. ATE has suggested mitigation such as junction tightening, speed reduction, segregation and lighting. These suggestions should be investigated to determine if mitigation can be achieved or not. It also essential that the proposed connections from the development site though to Belvedere Drive, Genoa Close and Lugano Grove, are investigated thoroughly to ensure that these can be

provided. Land ownership should be included as part of these investigations to ensure there are no obstacles that will prevent these connections from coming forward.

We understand the verge grass verges directly adjoining the development site are owned by Barnsley Council to Belvedere Drive and Genoa Close therefore no obstacles in providing pedestrian links to the adjoining existing residential developments are expected.

Active Travel England – Items not already covered under HDC

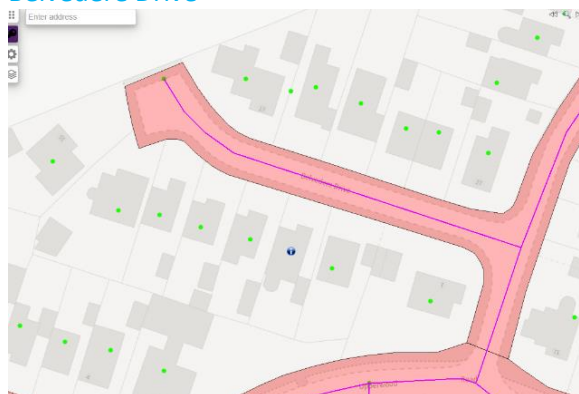
The proposals appear to see fit to retain 50mph speed limits in and around the application site, alongside the continued absence of safe crossing facilities along key desire lines while ignoring entirely the design requirements of LTN 1/20 in respect of safe conditions for cycling and the specification of crossings.

As part of the offsite improvement works packages, we are proposing to reduce the speed limit across the face of the development site along Doncaster Road to 40 MPH. Refer to Paragon Highways drawing PRGN-1229-HGN-DR-CH-104 - Proposed Speed Limit Scheme for further details.

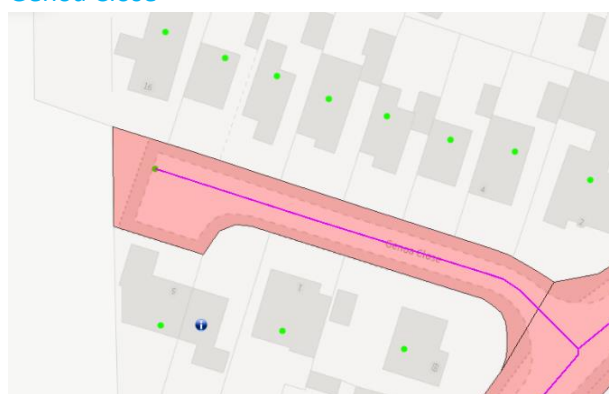
ATE seeks further information on how the development will achieve the indicated linkages along its eastern boundary to Belvedere Drive and Genoa Close which would shorten walking distances for some residents via Upperwood Road and/or the public footpath which abuts the primary school, while noting that these connections do not supplant the need to address the earlier concerns along Barnsley Road.

The carriageway and footpath adjacent the development site adopted is adopted by Barnsley Council, see extract below for extents of adoption. They directly adjoining the site ensuring pedestrian connection links are achievable.

Belvedere Drive



Genoa Close



It should also be noted that the multiple sets of barriers that confront users wishing to access / egress Lugano Grove will prevent access by disabled users and mobility scooters and consequently do not represent an inclusive and accessible environment and require to be removed if not already.

Existing barriers as required can be removed in required by Barnsley Council / Highways

Exolum

We have held discussions with Exolum Fisher German regarding the high-pressure oil pipeline apparatus, an appropriate stand-off to the pipeline has been provided complying with their requirements as the pipeline is location on Phase 1 development area

We are happy to include the recommended planning conditions in the decision notice to be dealt with as part of Construction and Operation Management Plan (COMP).

The objection refers to the outline application to Phase 2 where the position of plots is unconfirmed due to the nature of an outline application process, however there is no high-pressure oil pipeline within Phase 2, directly adjacent or in close proximity that can influence their network.



Tree Officer

The revised site layout seeks to further integrate comments raised, the redesigned layout eliminates hard surfacing with the rooting area of T35 and the retention of G31, G110 and G112. Dwellings are set an appropriate distance from T20, T24 and G25 to mitigate the need for root protection measures.

G113 set within the former tip area is still shown for removal, please refer to comments elsewhere regarding integration of the tip area within the redevelopment together with Biodiversity net gain proposals.

Ecology - Former Tip Area

Development of the allocated site excluding what is seen as “woodland/ scrub and unimproved neutral grassland” would not be possible due to a combination of engineering issues requiring solutions that are limited due to constraints surrounding the onsite oil pipeline, we understand that whilst this area currently rates extremely for biodiversity, brambles and other species will take eventually cover the site. Historically Barnsley Council used the area as a tip that would have no value whatsoever a mixture of inert waste material was dumped much of this can be seen on the surface in certain areas, kerb stones, bits of drainage and a whole host of other materials dumped on site including invasive species such as Japanese knotweed that has been able to develop and spread across the area as indicated on submitted reports, this must be dealt with immediately to prevent any further spread of invasive species on site.

The area had perimeter fencing around that has broken, deteriorated and is missing in several areas, it has various objects protruding the surface creating a health and safety obstacle course and an accident waiting to happen. There was no planning to create an ecological biodiverse area, it was created by circumstantial tipping of waste combined with abandonment of the enclosed area.

We fully appreciate the high value of this area in terms of biodiversity in its current state, however, to build new residential housing bound on all sides by the former tip area would also cause ongoing issues for any future residents, redevelopment will substantially increase the number of people and importantly kids directly adjoining this area would lead to long term ongoing hazard, it

would not be safe to leave this area in its current state regardless of the engineering issues outlined above that are created by the oil pipe line crossing the development site. The area of scrub land is certainly no idyllic woodland setting for homeowners to enjoy and benefit the setting.

We are proposing a biodiversity net gain offset to fully accommodate the credits the former tip benefits from as demonstrated in the breakdown across the entire site, refer to Whitcher Wildlife's biodiversity metric and report. We are proposing that the area of offsetting land is be provided on land directly adjoining the development site to the West of the attenuation basin within Phase 2.

Ecology – preliminary ecological appraisal

Survey information for the woodland to the south of the site adjacent to the proposed SUDS basin. It is unclear whether the woodland falls within the site boundary

The redline application boundary has been provided together with site layouts including surrounding aerial information. Whilst part of the application boundary does include the woodland area, there are no construction works within the woodland, works to enable the attenuation basin are offset preventing any impact on woodland habitat.

I advised that reptile surveys should be undertaken to support the application. The surveys should be concentrated within the area of woodland, scrub and grassland habitat to the west of the site.

Reptile survey data has been provided with 7 No. inspection records with no findings of reptiles within the woodland scrub area together with reptile matt location plans.

PEA recommends further surveys of trees assessed as having bat potential (paragraph 5.3) due to their close proximity to the proposed development

No further tree survey's have been undertaken, Whitcher Wildlife have reassessed the current layout and plot positions and indicated that no trees with any bat potential lie within c. 20m of the nearest unit. They have confirmed the landscaping layout provides sufficient screen planning together with an expected sensitive lighting strategy.

I requested that an overall BNG assessment be submitted for the proposals, rather than single BNG assessments for the two phases

See attached Whitcher Wildlife Biodiversity metric set out in one single document as requested. We confirm that only trees within the public open space are considered as part of the BNG metric. No trees have been included that are within private rear garden spaces.

Bird surveys

Yellow hammer and Sky lark plots will be created in the newly formed biodiversity offsetting land directly adjacent the development site. Further detail is provided within the biodiversity metric and associated report to provide mitigation measures.

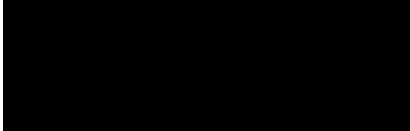
Children's Services

Confirmation no objection and the application Section 106 contribution sums for primary and secondary education have been provide and will be applied in full to Financial Viability Appraisal.

We hope these amended drawing and information now aligns with consultee comments and your aspirations for the allocated development site. If you can confirm agreement and a freeze to the layout we can submit a financial viability appraisal for consideration by your external assessor.

I look forward to hearing from you in due course.

Yours sincerely



SAUL CONSTRUCTION LIMITED

Mr P Justice