

## Comments on Planning Applications 2021/1089 and 2021/1090

Many of the documents are the same, if with different filenames. Comments are common to both if appropriate.

*Extracts from documents are in blue italics. Highlighted in red.*

Comments in black.

### Overall

It is clear that this level of development and “saving the planet” are not compatible and that development wins. Applying “Mitigation” is a recognition of this and it is little better than black magic, pretending that both can be achieved and hoping that nobody notices.

Many very important issues are left to “reserved matters”. What level of consultation will be applied?

Some of the housing in Phase 1(a) is completely unacceptable, not least because it is the very opposite of what was promised to residents by the very same developer.

15 years of disruption and destruction is completely unacceptable.

### Planning Statement

*4.29 • Arboretum link road with a communal linear park* This smacks of the siting of the playground at Penny Pie Park – A “park” adjacent to the link road with its probably heavy and stop/start traffic (thanks to roundabouts and crossings) is not environmentally friendly for those using it.

*4.33 2-, 3-, 4- and 5-bedroom properties ... mainly 2 storey high properties with some containing rooms in the roof-space (also referred to as 2.5 storey) and 3 storey homes.* What happened to the promise to some residents to ensure that bungalows would be appropriate where existing properties are of that type?

*4.34 The layout has carefully considered the relationship with existing residential development which adjoins the western boundary.* Ditto. Consideration may have been careful but the result was perverse.

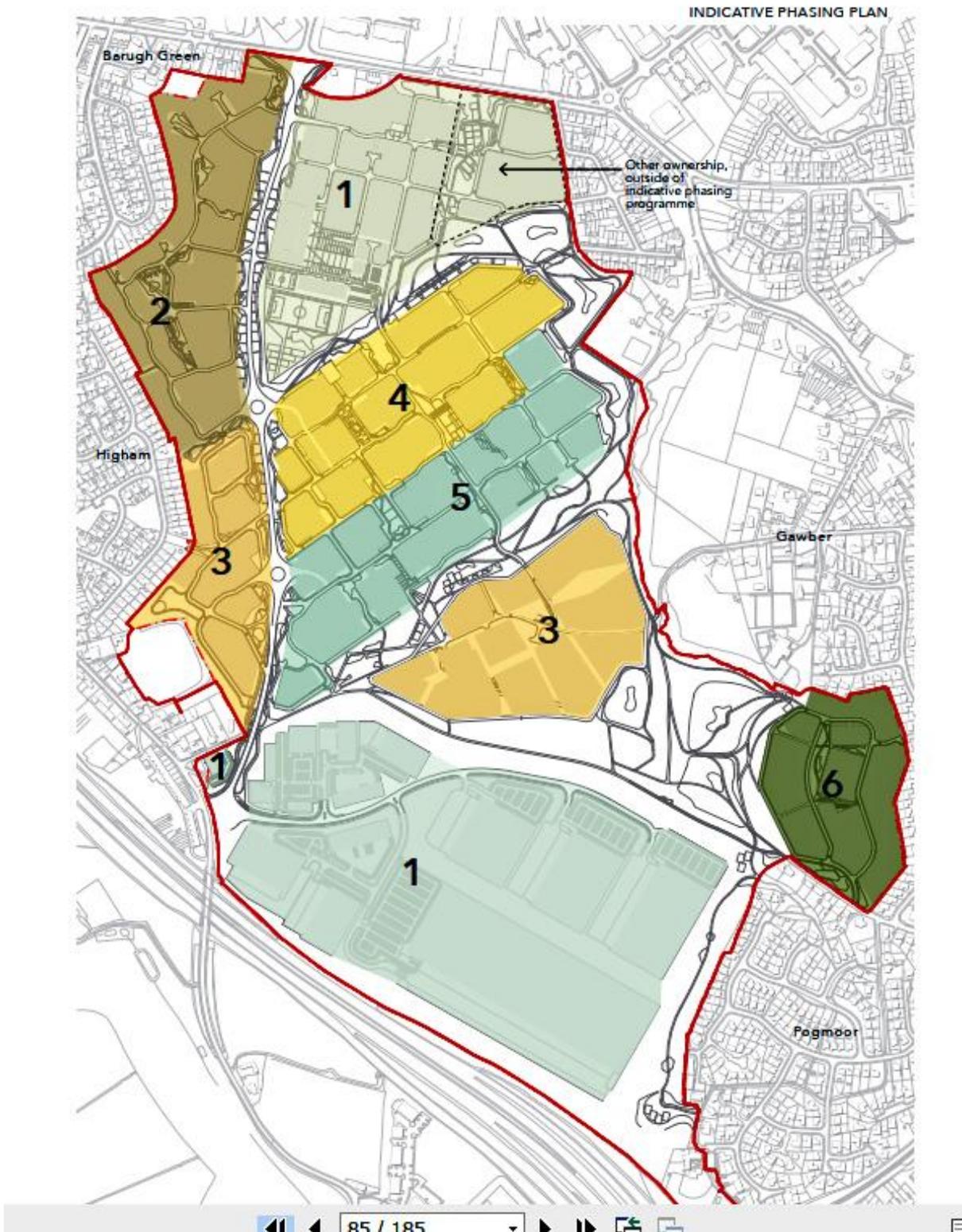
*4.39 The location for employment development requires good links to the strategic highways network to minimise the impact of HGV's travelling along the new the link road* This ignores the purpose of the link road linking to businesses north of the site.

*4.43 A new 2 form entry primary school with ...car parking* There are serious complaints about street parking by staff near Horizon College (not to mention school run parking issues at most schools). Irrespective of aims to initiate “active travel” the likelihood for the foreseeable future is continued heavy use of cars by staff and parents, not least because the housing is being sold to commuters. Is there sufficient room for a suitably-sized car park and drop off facilities?

*4.44 Maximum building heights are illustrated for each land use on the Parameters Plan. ... consideration of the existing residential areas surrounding the site. It is assumed that the building heights across the residential element of the site would be up to 3 storeys (up*

to 13.5m in height). See above even 2 storey properties are unacceptable in areas where existing properties are single storey.

4.46 Remodelling of the site would last for up to 8 years, to allow for the necessary earthworks and land surcharging [time for the ground to settle and strengthen] What is the precise programme by location? What is understandable from this document is that the masterplan framework issued in November 2020 is quite out of date.



4.47 *The construction programme is expected to commence during 2022 ... Phase 1(a) (i.e. the first 229 dwellings) would be completed by 2026. See above.*

6.5 *Priority will be given to development within Urban Barnsley as a first priority ... Really?* The MU1 site was not in Urban Barnsley before the LP process and was integral to separating the communities outside the urban area from each other, an important NPPF consideration.

6.13 *the separation distances have been exceeded from the existing dwellings to protect residential amenity levels for both existing and future residents.* Residential amenity, in many cases, includes consideration of relative heights of existing and proposed properties.

6.31 *The link road has been designed to accommodate the proposed development in combination with reassigning traffic from the local roads, such as Higham Common Road. The reduction of traffic and congestion on roads not designed to carry heavy volumes of traffic will be significantly improved.* On the other hand, there will be new traffic on the link road which will also include traffic that would otherwise use the Dodworth Road gateway. The only road likely to see any benefit will be Higham Common Road north of Hermit Lane. Traffic that can now use Hermit Lane will have to use one or other gateway route.

6.32 *will provide four crossings along the new link road, as well as crossing points at the proposed roundabouts, to ensure the site is well connected.* This will be a sloping road with much stop/start activity involving HGVs as well as cars, with consequent implications for noise and air quality.

6.35 *the potential environmental effects resulting from the increase in traffic generated by the development are predicted to be minor or negligible* See above. How can this be claimed, remembering that the starting point is 122ha of green space?

6.93 *A single hedgehog was recorded on site in 2020 and suitable habitat is present for hedgehog.* That must be one very athletic hedgehog! They are a fairly common sight in gardens surrounding the site, along with other fauna. The link road will provide an effective barrier for small animals unless there are crossing tunnels, etc.

6.97 *Due to the size of the site, it will be brought forward as a multi-phased development, though ground works may be required generally at the outset for to achieve appropriate levels for the development platforms and drainage infrastructure.* What is the programme by area? See above.

6.105 *The assessment of landscape effects during operation also concludes that the character of Barnsley Settled Wooded Farmland would be significantly adversely affected by the proposed development at year 1. By year 15 the level of effect would have reduced with maturing planting and the development becoming more settled in the landscape.* See comments below on climate change.

6.106 *Construction works will affect the composition and character of views and will be over the medium term (5-15 years).* Ditto.

6.107 *At year 15 significant adverse effects would remain. This is due to the overall scale of proposed development, and maturing vegetation would not have enough mitigating effect to reduce the level of effect below significant for these receptor groups.* Ditto

6.108 land, which is currently undeveloped would further disappear from views, to become extensively developed with no visual break between the residential area of Gawber and Higham. This defeats a key aspect of NPPF, avoiding communities coalescing.

6.110 Whilst the assessment of landscape effects during the construction and operational phases concludes that the proposed development would have significant adverse effects on the landscape, ... this Statement demonstrates that significant weight in the planning balance towards economic growth and investment should be applied to outweigh the identified landscape effects in order to confirm the site's suitability for development. This is more like an either/or situation. See also comments on climate change.

6.115 The site is well separated from neighbouring properties. Within the proposed development separation distances meet or exceed national guidelines and boundary treatments between plots ensure privacy is maintained. As a result, the proposals **will not have a detrimental impact on the amenity of existing or future occupiers, within or adjacent to the site in respect of overshadowing, loss of daylight and overlooking.** This is clearly nonsense. The much-stressed greening of areas between elements of the development is mainly internal to the site. The last part of the last sentence is an insult to existing residents.

6.116 The proposed layout is reflective of the form of development surrounding the site, whilst making the most efficient use of the site. As a result, there are no concerns regarding the impact of the proposed development in terms of residential amenity for existing or future residents. See above.

6.123 development which impacts on areas sensitive to air pollution due to traffic emissions will be expected to demonstrate suitable and proportionate mitigation. The land subject to this application is located within Air Quality Management Areas (AQMA). Land bordering existing properties close to the route of the link road currently enjoys freedom from any of the pollution arising from the link road. What mitigation can offset heavy commercial and domestic vehicular movements on a sloping road with at least six possible stopping points?

6.127 The effect of road traffic during the operational phase of the proposed development at modelled locations is also identified as not significant. See above. Wishful thinking.

6.131 Regarding potential noise impacts associated with the construction phase of the proposed development, the assessment has determined that there is likely to be a temporary major effect at existing dwellings to the west of the site when the Phase 1(a) residential area is constructed. ... An acoustic barrier along the western boundary of the Phase 1(a) area; ... What form will this barrier take? Will it be removed when construction is complete?

6.143 For the phase 1(a) development it is unlikely that low or zero carbon technologies would be required to achieve compliance with Building Regulations. This appears to mean conventional gas heating/cooking, for example, yet it is BMBC's objective to force a switch to electric heating. Why install obsolescent equipment? Could it be recognition of unacceptably high running costs?

6.145 For the Phase 1(a) residential development EVCP (Electric Vehicle Charging Points) will be included for each dwelling. The trend is for high charge rates to minimise

downtime. What rate is proposed here? Will the power distribution system be rated for future high rate chargers? Will the installations be suitable for 2-way operation? If smart meters are installed, they will be obsolete as soon as separate control of EV charging, heating and other large loads is implemented.

[ENVIRONMENTAL STATEMENT – Non-Technical Summary](#)

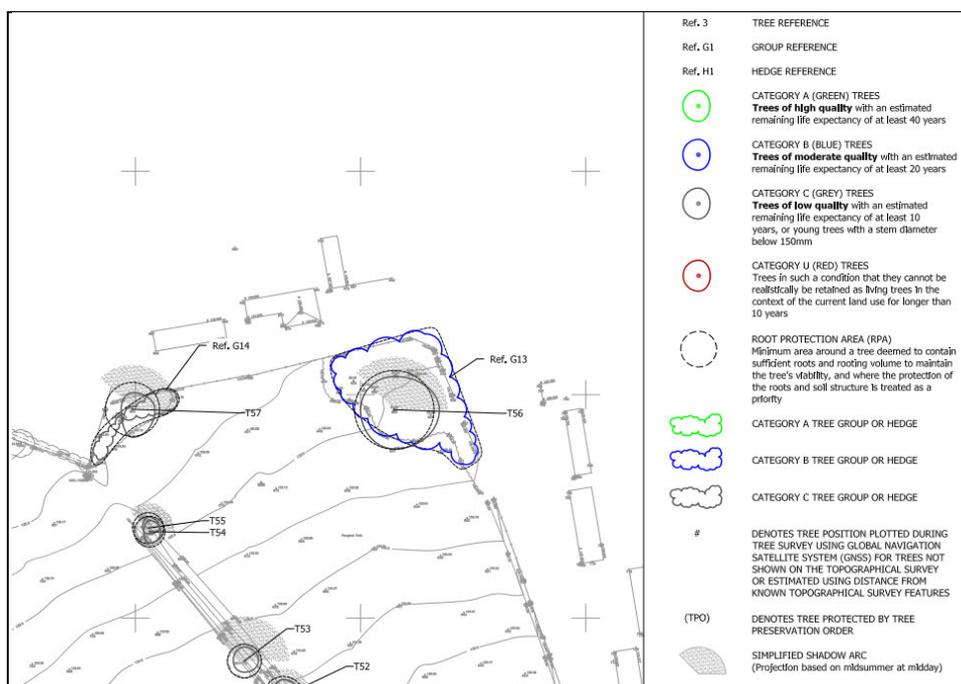
26. *The results of this assessment have indicated that the potential environmental effects resulting from the increase in traffic generated by the development are predicted to be minor or negligible and not significant.* Contradicted by the statement below and the extensive amount of “mitigation” required for noise detailed in the Noise chapter.

43. *The Development will generate additional traffic and will cause a redistribution of existing traffic on the local road network. There is the potential for adverse effects on local air quality to occur at existing and proposed properties located close to roads where traffic flows are predicted to increase as a result of the operation of the Development.* See above.

45. *During the operational phase the effect of road traffic from the Proposed Development at nearby locations would be ‘Not Significant’.* This effect may be reduced further via the implementation of mitigation strategies as required under the BMBC Air Quality and Emissions Good Practice Planning Guidance (March 2020). See above.

63. *Mitigation has been built into the scheme in order to prevent the project giving rise to significant effects in relation to its contribution to climate change through the emissions it will produce. This includes constructing the development in line with UK Government carbon reduction targets for residential and non-residential development. Mitigation will also prevent the development from experiencing significant effects as a result of climate change in the future.* See the section on climate change

**20211089 AIA Rpt Figures ACAD\_B028734 Barnsley West Tree Constraints Plan TCP17.pdf**



***20211090 AIA Rpt Figures B028734 Barnsley West Tree Protection Plan TPP17.pdf***

Trees in the corner of Wharfedale Rd/Colster Close are classed as trees of moderate quality with a 20 life span and some of them at least were planted as part of a planning consent, but all appear to have been slated for removal. Is this correct? If so, why?

***20211090 LRDP 9014-A3-100-P-002-B GENERAL ARRANGEMENT SH 1 OF 3.pdf***

The crossings at Ch.140, Ch.450 on Sheet 2 and Ch.840 and 1010 on Sheet 3 have an adverse effect on traffic flow.

***20211090 ES - Vol 1 Chapter 6 Figure 6.8 Landscape Masterplan.pdf***

Relocation of the road opposite St John's Avenue could increase separation.

***20211090 Illustrative Masterplan.pdf***

Lack of facilities for Gawber J&I School drop off.

In the original masterplan there was a green buffer behind Wharfedale Road and this should be reinstated.

***20211090 ES - Vol 1 Chapter 15 - Climate Change.pdf***

*15.3.2 Given that the site is largely greenfield and farmland and no operational buildings, for the purposes of GHG **assessment the emissions within the Project Site are assumed to be zero.** This will allow for the completion of a worst-case assessment of net emissions and evaluation of the significance of these on future climate change. Best scenario, therefore, is do nothing.*

*15.3.7 ... the RCP 8.5 (high) emissions scenario has been selected for use within these assessments though this may over estimate climate risks should global efforts to reduce GHG emissions begin to take effect and result in a "medium" or even "low" emissions scenario in the years ahead. Even IPCC (behind the political summaries) don't recommend using this scenario, which is deemed extreme and most unlikely to happen.*

*15.4.5 Changing temperatures and rainfall may change the habitats within the Site, primarily those which have value – i.e. the SACs, SPAs, and Local Wildlife Sites ... There will be no habitats, as earthworks taking place over long periods will destroy what is currently there.*

*15.4.8 A full flood risk and drainage strategy supports the planning application and sets out the impacts of the Proposed Scheme and its resilience to potential for increased winter rainfall as a result of climate change. As a result, primary mitigation resulting from the design will reduce any risk to essential infrastructure and human health to a level that is not considered significant. All that will change will be the details of the flood prevention arrangements, which would be required to meet present-day standards anyway. Any extra effort = extra CO<sub>2</sub>.*

## Disruption of transportation patterns and infrastructure due to severe weather conditions

15.4.9 *Pedestrians and cyclists will be sensitive to extreme weather conditions which could affect transportation patterns. The increased likelihood of overheating could have a detrimental effect on the comfort of public transport users.* There will be 15 years of serious disruption, requiring travellers who would be able to cross the site via Hermit Lane or existing footpaths to use circuitous route and possibly have to use powered transport where walking would have been preferred. Recreational walkers will have to travel further afield by car. *Pedestrians and cyclists will be sensitive to* weather rather more than climate change.

15.4.12 *An increase in traffic (including HGVs) during the construction phase of the Proposed Scheme was assumed at Scoping stage. The Transport Chapter (Chapter 8) confirms within Section 8.8.17 that increases to traffic flows will be minor adverse. Any required mitigation measures for traffic management during construction will be set out within the CEMP, prepared to define local routes to be used by lorries generated by construction activities so that carbon emissions associated with the temporary increase in construction traffic to existing pedestrians, cyclists and drivers will not be significant, in line with the assessment of impact on traffic flows.* How can there be any trust or reliance on a study that suggests *increases to traffic flows will be minor adverse* when the starting point is carbon neutrality (at worst), when development of the site will involve:

- Millions of cubic metres of earthmoving;
- Manufacture, delivery and pouring of thousands of tonnes of concrete;
- Manufacture, delivery and erection of thousands of tonnes of steel;
- Manufacture, delivery and installation of building cladding and other construction materials;
- Manufacture, delivery and laying of millions of bricks and roofing tiles;
- Manufacture, delivery and laying of thousands of tonnes of tarmac and drainage products?

15.6.1 *There are no residual effects considered likely during the construction or operational stages as a result of climate change which cannot be appropriately mitigated by the mitigation measures which have been built into the scheme proposals.* See above. Implausible.

15.8.3 *Mitigation measures that are included to reduce GHG emissions from the operational stage of the development are detailed in the Sustainability Appraisal Statement (Appendix 15.1) As a result, the majority of potential effects have been determined to be insignificant.* See above. Implausible. Whilst claiming no significant effect, the developer is, nevertheless, prepared to spend almost £1million on “mitigation”. A similar commitment on the Hermes site resulted in a proposal for, in effect, bike sheds and charging points, none of which would necessarily result in any actual behavioural change.

## **20211089 ES - Vol 2 Chapter 15 Appendix 15.1 Energy and Sustainability Statement.pdf**

...

3.1.1 *Barnsley Local Plan (Adopted January 2019) Planning policy CC1 ‘Climate Change’ states:*

*We will seek to reduce the causes of and adapt to the future impacts of climate change by:*

*i) Giving preference to development of previously developed land in sustainable locations;*  
In that case, why MU1?

*Development will be expected to minimise resource and energy consumption through the inclusion of sustainable design and construction features, where this is **technically feasible and viable**.* There are no current alternatives for any of the CO<sub>2</sub>-intensive major construction processes, so this is meaningless virtue signalling.

*We will allow development that produces renewable energy as long as there is no material harm upon:*

- i) The character of the landscape and appearance of the area;***
  - ii) Living conditions;***
  - v) Key views of, from or to scenic landmarks or landscape features;***
- Another fail.

*Planning policy CC1 'Climate Change' states:*

*We will seek to reduce the causes of and adapt to the future impacts of climate change by:*

- i) Giving preference to development of previously developed land in sustainable locations;***

Another fail.

#### *5.1 Policy*

*Planning policy CC2 'Sustainable Design and Construction' states:*

*Development will be expected to minimise resource and energy consumption through the inclusion of sustainable design and construction features, **where this is technically feasible and viable**.* See above. Meaningless virtue signalling. Even where a problem is admitted, the magic word "mitigation" appears, where the proposer pretends something useful has been offered, whereas the definition of "mitigation" is merely the act of making a condition or consequence less severe. In effect, "Yes, there will be any number of issues but we'll do our best to make them less worse than if we did nothing".

There is clear conflict between the goals of development and saving the planet and development wins.

***20211089 ES - Vol 2 Chapter 10 Appendix 10.4 - Coal\_Mining\_Assessment.pdf***

#### *6.0 CONCLUSION*

*....*

*Coal may be encountered during the earthworks operations. Any coal encountered during the earthworks shall be treated as 'incidental' and an agreement to remove the coal from the Coal Authority will be required.* Presumably, any available coal will be exploited by the developer to offset costs. How does this sit with the Council's climate policies?

