
An Ex Ante Appraisal of the Barnsley Urban Centre IDP Part B Priority 5 Integrated Development Plan

A Report to the South Yorkshire Objective 1 Secretariat

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1.0 EXECUTIVE SUMMARY

Overall, this is a solid, thorough and balanced plan. It has a logical structure which seeks to link needs and opportunities. Although further development is required (a point which is recognised by the authors), considerable thought has gone into individual projects which is extremely helpful. Furthermore, the plan does take account of risk factors and has established a First Year Priority Programme as a means of moving forward on priorities.

There are a number of suggestions within this document as to how the plan might be further enhanced, as well as considerations for the future. The following seeks to summarise some of the key points:

- Further consideration of the contribution of partners in developing projects.
- Clarification of the scope of the business districts and further detail on the community business districts.
- Further thought as to how the sector strategies link with the masterplans to avoid strategy overload. Additionally, the list of and rationale for, target sectors would be helpful.
- Further consideration of how the thematic elements will be carried forward at strategic basis in addition to the projects identified.
- The potential importance of fostering existing, traditional activities was raised in our Part A report, and has still not really been carried forward.
- The range and definition of targets needs to be brought into line with the PC. Overall further work is required in relation to targets. Furthermore, the lack of information on costs and outputs make value for money assessments impossible.
- Slightly more clarification on the process for monitoring/evaluation and review.
- The expected contribution of the different priorities to targets cannot be unpicked at present, and further detail on this is required.
- Whether there is greater potential to lever in private sector investment than the plan currently states. If the relatively modest levels cannot be increased, the problems of leverage should be discussed further.
- The extent to which links with past EU investment is discussed is limited to Objective 2, and we would expect the Commission to want to see this element enhanced.
- The provision of further site details if possible e.g. type of floorspace.
- The need to incorporate further information in relation to market failure issues.

2.0 INTRODUCTION AND APPROACH

ECOTEC Research and Consulting Limited in association with Weatherall, Green and Smith were appointed to conduct an independent appraisal of the Objective 1 IDPs. This report involves an appraisal of the quality of the key elements outlined in the IDP template for Part B (Part A was reviewed in February 2001) for Barnsley Urban Centre. Briefly the two parts comprise of:

- An assessment of the strategic context, objectives, impacts and links to other parts of the programme (Part A)
- A more detailed appraisal of delivery aspects (Part B).

The report contains the following:

- An economic appraisal of delivery aspects, funding and outputs (Section 3);
- A thematic review covering, equality and inclusion, ICT and sustainability and transport issues (Section 4); and,
- Comments on property aspects (Section 5.0).

We have set out our key recommendations in italics throughout the text. Appendix 1 sets out the minimum requirements for Part B plans. Figure 2.1 indicates the current state of compliance with these requirements. Broadly speaking, the plan provides some detail about the actions required to delivery the objectives of the IDP and does contain a detailed schedule of projects. Some of the other requirements have also been provide including a plan of the IDP area (also provided in Part A). At this stage project site plans, sketch schemes and illustrations, photographs and publicity material have not been provided.

Figure 2.1: Compliance with the Minimum Requirements of Part B Plans

Requirements for Part B Plans	Included (Yes/No)	Comments
Actions to deliver the objectives of the IDP	Yes	
Early public sector improvements/actions required	Yes	
Identification of projects with key characteristics set out	Yes	
<p>Schedule of projects containing the following:</p> <ul style="list-style-type: none"> - Methodology and delivery vehicles - Public sector partners - Private sector partners - Collaborative partners - Activities - Site identification - Ownership issues - Constraints - ERDF funding required - Public funding - Private funding - Phasing - Relevant deliverability criteria e.g. requirement for planning consent - Linkages for other priorities for grant - Sustainability profile – economic and environmental - Risk analysis 	Yes, although not to the detail required.	<ul style="list-style-type: none"> • The Action Plan details, on an objective by objective basis, individual activities/projects. This schedule indicates linked IDP objectives, lead agency, lead SPD priority/measure, estimated total cost, illustrative funding source, delivery timeframe and outputs. At this stage no priority is identified for individual activities/projects.

Other Requirements		
• Plan of IDP area	Yes	
• Project site plans	No	
• Sketch schemes and illustrations	No	
• Photographs	No	
• Publicity material e.g. posters	No	
• Capability to utilise software and electronic facilities	No	

3.0 OVERALL PLAN AND ECONOMIC APPRAISAL

This part of the appraisal will focus upon the economic (employment and business creation) impact of the programme. It will also assess how financial and output estimates for the IDPs correspond to Priority targets highlighting any variances or areas of concern.

3.1 General points

This is a solid, thorough and balanced plan. Its strengths include:

- A logical structure which includes a comprehensive approach and a clear effort to link needs and opportunities;
- An extensive range of detailed thinking on individual projects with recognition of the need for further development work.
- Some consideration of risk factors and how they can be handled;
- The identification of priorities – the First Year Priority Programme is a very helpful way forward.

There is recognition of the weakness of private sector development interest and consideration of means of addressing this. *However, it is also important to recognise the present uncertainty about precisely what role Objective 1 resources will be able to play in supporting gap funding and private sector schemes more generally and the potential for delays in resolving these issues.*

There has been a clear attempt to build a broadly based partnership with strong private sector involvement to take forward the plan and this is clearly to be welcomed.

Though it is indicated that a range of partners will bring forward projects, there is clearly a very ‘uneven playing field’ in terms of project development resources and *it would be useful to consider how this might be addressed.*

There are references to monitoring but *it would be helpful to include a more detailed discussion of the processes of monitoring/evaluation and review and updating.*

The concept of business districts is a useful one, although the way it is taken forward is something of a hybrid. *What substance the community business districts are likely to have in practice warrants some discussion. The scope of the business districts of different types also need clarification.* Section 1 introduces and provides maps for four business districts which are identified as “priority locations” (though it is not clear to us if Kendray is covered in the maps). The list of districts then grows to 7 (p18) and 8 (p20) without clear locations or plans or a strong steer on how far the non-priority districts are to be treated differently.

Presentationally it would be better to start with a long list and then to set priorities making clear what this is to mean in practice.

The discussion of business district master plans and sector strategies suggests a risk of strategy overload. However, as the sector strategies appear to link to single business districts it should be possible to produce single, sharp documents.

Helpfully, the plan has addressed constructively the issue of links to the SEZs and there do not appear to be significant overlaps.

The plan highlights the proposed extent of use of Measure 30 funds and provides an associated target for firms assisted. In common with the Part Bs we believe that *the issue of developing supply chains warrants more working up.*

We commented on the draft Part A strategy on the extent of the focus on new activities and the potential importance of fostering existing, traditional activities - following which a reference was added to this in the strategy. *This aspect has not, however, really been carried forward.*

The horizontal themes of the SPD are carried forward into the Part B. *However, with the possible exception of aspects of sustainability (the proposal for environmental profiling), they have not been strongly developed.* For example, promoting equal opportunities has to be about much more than “ensuring no groups are discriminated against in terms of access to opportunity in the Urban Centre.”

The issue of the split of Measure 29 resources between the Urban Centres will clearly be a matter for discussion in the wider Driver Partnership. At present the financial table involves a bid for around a third of the available resources. It expects to deliver 30% of the new floorspace target from the PC and a similar proportion of the refurbished floorspace but a much *higher proportion of the net additional jobs.* *However, there is a need here to ensure that the range and definition of the targets is brought into line with the PC.*

The project level detail cannot be built up to the level of the summary table, though it clearly indicates that there is at least the potential to deliver – and perhaps much more than deliver – on the overall targets.

3.2 Overall Economic Assessment

3.2.1 Types of Activity and Contribution to Critical Mass of Economic Activity

As noted in the context of the Part As, the approach has a very clear sectoral focus but there are questions concerning the scale of the potential for some activities and the potential role of Barnsley vis-à-vis Sheffield. *Targeting on the P1/P2 sectors is arguably currently limited.*

The Plan has the potential to create significant impacts but clearly not to transform the Urban Centre.

3.2.2 Links to the Relevant Policy Context

Comments were made in the Part A report and need not be repeated here. The clear links to the SEZ context are helpful.

3.2.3 Significance and Appropriateness of the Economic Activities Involved

Since there are no clusters within Barnsley it is not appropriate for such specific activities. The IDP refers implicitly to target sectors, and *the rationale for the choices (and a comprehensive list of target sectors) would be helpful.*

The real questions relate to the extent of the potential for generator services and how much can be done in reality to change the role and ambience of the town centre. See also comments above about the P1/P2 sector link.

3.2.4 Rationale

The issue of market failure is dealt with, although the reasons for this market failure are not necessarily explicit. *Some further analysis of its scale in relation to different types of property development would be helpful.* The proposed, pragmatic approach to tackling the problems involved is a sensible one.

3.2.5 Potential for ESF/ERDF Integration

This is dealt with in terms of the nature of the activities involved and in aspects of the funding package. The plan as a whole deals well with the issue of integration. The only real concern is the limited focus on higher level skills which seems to us critical to some of the aspirations to develop higher value added sectors – an issue for all of the IDPs.

3.2.6 Links to Other Priorities

These are generally highlighted clearly both in the approach and in the proposed funding package.

3.2.7 Objectives

The framework of objectives is clear and reasonable. *The targets will require further work – as discussed below – and linking back to the Part A (where we raised some questions about the job need calculation).*

3.2.8 Supply Chain Issues

As noted in the general comments, this is an aspect that warrants further development. *Specifically, attention should be paid to consultation with local SMEs and a consideration of links/networks between major new companies and SME suppliers.*

3.2.9 Financial Appraisal

We commented on some aspects in the general comments above. Other points of note are as follows:

- The overall balance of the package in terms of the division of resources between objectives is extremely reasonable;
- The extent of private sector investment looked modest – particularly compared with the other plans we have looked at so far. *This may well reflect a realistic assessment of the problems of levering in private sector developments but it warrants discussion;*

It is not possible – because of the integrated nature of the funding package to fully separate out the P5 element. The leverage of total ERDF to other spend of (1:1.1) is below the PC estimate of 1:1.5 for Measure 29, although if Measure 29 ERDF is considered alone the leverage ratio rises to 1:2.4 – although this is clearly a basis of calculation which would be difficult to defend. *Again this aspect of the plan warrants discussion.*

At present the funding packages for individual projects are indicative and lack detail – which is not unreasonable at this stage. There also seems to be more detail for the first year priority schemes – in particular the Digital Media Centre – which is clearly helpful.

3.2.10 Links to Past EU Investment

Except for some discussion of continuing schemes (past work under Objective 2), this element is missing and *it is an aspect we would expect the Commission to want to see provided.*

3.2.11 Outputs and Impacts

See general comments. The approach is a perfectly reasonable one but, as argued, the framework of targets requires development, with definitions reflecting the PC. The Part A document also provided a range of supplementary baseline data against which change can be measured.

Part A calculates that about 1700 net additional and safeguarded jobs are needed in the urban area to achieve local goals (essentially a reduction in the Barnsley unemployment rate to the national average). This figure of 1700 is then adopted as the target impact to be achieved through all EU Objective One intervention.

Part A also presents a table showing what is to be achieved through Measure 29 resources, including 500 jobs safeguarded and 700 jobs created (1200 in all). The inference is that the balance of 500 jobs will flow from EU Objective One expenditure outside Measure 29. This table is based on a pro rata'ing of the outputs listed in the SPD.

Part B repeats (Page 20) the figure of 1700 jobs and divides it in an arbitrary though doubtless reasonable way between the various business districts. Part B does not, however, comment on the other outputs to be achieved through Measure 29 or other measures.

We have had to assume that the outputs table presented in Part A for Measure 29 remains valid. The lack of any detailed account of how outputs are to be achieved has inhibited the extent to which we have been able to undertake this assessment.

There will also be a need to ‘unpick’ the expected role of spend under different priorities in contributing to the targets. Additionally, it seems that the figures (in 3.4.4) are incorrect, as are the VAT registration figures; but we are happy to discuss this directly with the authors.

The issue of contribution to new growth and high value added sectors is a difficult one. As noted, targeting on the P1/P2 sectors is arguably somewhat limited and achieving growth in some of the targeted activities may not prove easy in practice.

The Objective 1 SPD sets target ranges for P5 (see below), however since the IDP does not provide an analysis of outputs and costs, it is not possible to make a comparison.

Table 3.3: Priority 5: Target Ranges	
Indicator	Target Range
Outputs	
Business Assisted	£60,000
Land reclamation	£300,000 - £600,000 hectare
Floorspace constructed	£750 per sq. m
Floorspace refurbished	£250 - £300 per sq. m
£1 of investment	£1 of support generates £8 in increased sales
Km of motorway	£5.2m
Results	
Sq. m per developed hectare	£2,500 - £8,000
Serviced land developed by end of Programme	80% - 90%
Impacts	
Jobs accommodated	1 per £20- £30 sq. m
Dead-weight - ERDF	15 - 25%
Displacement ERDF	25 - 35%
1 net job	£27,000 added value

Source: Single Programming Document, Objective 1, South Yorkshire, Part 3

3.2.12 Deliverability

There is no reason to question this at this stage, although – as the plan itself recognises – there are inevitably some difficult issues. The modest reliance on the role of private sector investment, paradoxically, reduces a major source of uncertainty.

3.2.13 Value for Money

Again, it is not possible to ‘unpick’ value for money comparisons with the SPD target ranges from the summary table because of the way the figures are bundled. However, for objective 3 – property development – working the calculation backwards produces an anticipated level of spend – based on the PC target range for spend per m² of £20.9m-£22m, which is virtually the same as the projected spend on the objective in the plan of £21m. Of course, it is entirely possible that this may have been how the summary table was built up and that the exercise is simply circular!

We have not looked at individual projects bearing in mind the status of the costing indicated by the plan text. Individual projects will clearly require later appraisal.

4.0 THEMATIC REVIEW

We take each of the three main thematic areas in turn.

4.1 Equal Opportunities, Social Inclusion and Employability

4.1.1 Overall Comments on the Urban Centres

The Part Bs for the Urban Centres, in the main, take a ‘pepper potting’ approach towards equal opportunities, social inclusion and employability. All the plans mention communities, highlighting the need for involvement and specific projects that will benefit local residents, particularly in relation to accessing jobs and training. However, the majority of the plans could do more to demonstrate an integrated approach to ensuring that equal opportunities, gender mainstreaming and employability are considered in all Urban Centre activities, whether project or management related.

Integrated Implementation Plans (IIPs) for sites, as suggested for the SEZs, and sustainability profiling as mentioned in the Barnsley plan, could be usefully developed for the Urban Centres, particularly in relation to cross cutting themes. Provided that projects are required to develop and provide IIP type documents, this would seem to be an effective way to ensure that sustainability issues are taken forward. The piloting of community access plans for some areas in the SEZs would also appear to be an appropriate way to ensure community involvement. It could be useful to explore the capacity of communities to get involved in ‘planning for real’ activities to ensure projects reflect issues of sustainability as suggested in the Rotherham plan. The Rotherham IDP provides a useful approach to communities and equal opportunities through specific activities within the sites such as advertising jobs in local newspapers. The Plan also considers cross cutting themes within a matrix and identifies measure indicators. This approach could be usefully replicated.

One plan requests that the Programme Executive provides advice about how cross cutting themes could be integrated into Part B. Guidance about what the plans are expected to produce, and to what level of detail, is important here. It would also be useful to have within the Part Bs information about how specific equal opportunities targets will be met, and monitored, through the projects and how sustainability issues will be/have been integrated into project selection criteria. Some plan areas such as Barnsley and Rotherham are more advanced in relation to these issues. However, the above remain the main challenges facing plan teams attempting to integrate equal opportunities.

4.1.2 Barnsley Comments

The Plan notes that community links are already established. In particular, the Area Forums have contributed to the preparation of the Community Plans which, in turn, have fed into the IDP. That the Area Forums will be an important means of ensuring community involvement in the delivery of the IDP is recognised. There are, too, local groups which will be relevant in the development of Community Partnerships. *Attention will need to be paid to ensuring representation and involvement across the whole of the Urban Centre.*

In referring to project selection, it is stated that projects will need to demonstrate consistency with the wider Objective 1 strategy and, further, that they will need to make a tangible contribution towards at least one of the six cross-cutting themes of the Objective 1 Programme. *Further work is merited to determine exactly what projects will need to demonstrate in order to satisfy gender mainstreaming and equal opportunities objectives, to avoid accusations of tokenism.*

4.2 ICT

ICT is integrated more fully than equal opportunities into the Part Bs and is frequently mentioned in relation to specific sites within the plans, for example in relation to ICT infrastructure provision and strategies. As with equal opportunities, ICT could usefully be developed within IIPs. The SEZ Part Bs state that connectivity is not an issue. The Urban Centres could usefully explore whether or not this is the case. The plans could also be enhanced with further details about how advanced the sites are in relation to ICT and specific ICT activities to be developed within the site profiles.

4.3 Transport, Labour Mobility, Environmental Sustainability and Sustainable Development

The appraisal of Part A highlighted a number of issues in relation to Transport, Labour Mobility, Environmental Sustainability and Sustainable Development. A summary of these are provided in Annex 2.

4.3.1 General Coverage of Sustainable Development Part B

The Barnsley Part B IDP Action Plan states that all projects will need to demonstrate consistency with the wider Objective 1 strategy. In particular projects need to make a tangible contribution to at least one of the cross cutting themes. It also states that all projects put forward reflect these themes. However, the plan makes no explicit attempt to demonstrate how projects will contribute, nor does it propose to offer project sponsors any suggestions or proactive assistance in understanding how they might contribute.

Whilst the proposal to undertake sustainability assessments of all physical development projects is welcomed, it is important that this is not seen as merely a negative check on applications but rather an opportunity to promote ideas to project sponsors for how they could contribute to the cross cutting themes. *The plan could usefully set out the type of actions it would wish to see different types of projects incorporating to work towards environmental or wider sustainability objectives.*

If this is not considered by the partnership as the appropriate level at which to address these issues, the implementation framework proposed for development projects does provide the opportunity for inclusion of suggested actions through the following:

- Business district masterplans (Objective 1)

- Preparation of development briefs (Objective 3)

4.3.2 Promotion of Actions Supporting Environmental Sustainability

In relation to physical development, it is important that the actions suggested for promoting environmental sustainability go beyond enhancements to the urban realm through improved urban design and landscaping. The Plan should additionally encourage, where appropriate: energy efficient buildings; use of recycled building materials, use of renewable energy, adoption of waste and/or water recycling methods, and adoption of other sustainable technologies.

4.3.3 Transport and Labour Mobility

The Part B documentation includes a reasonably comprehensive range of transport actions, including some which would not have been evident from the first draft of the Part A document i.e. improving links to SEZs, travel plan co-ordination and the development of cycle and walking networks. These would appear to provide the basis for the development of a better integrated land-use transportation system in the Barnsley Urban Centre and between the Centre and its surrounding communities.

5.0 PROPERTY COMMENTS

5.1 Property Summary

Property activity is essential in realising the strategy for Barnsley Urban Centre. The potential for, and potential value in, the Plan linking with the SEZ strategies (particularly those for the M1 and Dearne Valley, given they adjoin Barnsley) is also recognised. Overall, the Plan would be enhanced through:

- Some further basic facts about each site, for example ownership, constraints, deliverability criteria, remedial costs, phasing, *would give the reader more insight into the relative risks of each one*. The SEZs provide a good model in this sense, setting out estimated take-up rates, the main areas of risk¹, the positive and negative features in relation to planning policies, environmental and social criteria, value for money and a summary analysis.
- The incorporation of further information in relation to market failure issues, the need for intervention and analysis of market activity (take-up rates, rentals, capital values, for example).
- The production, at some point, of a *phasing plan*.

5.2 Part A Review

The Part A review highlighted a number of key issues:

- All 5 Wards are amongst the most deprived nationally
- Barnsley does not attract substantial insitutional investment towards property development
- Developers refer to depressed rent/capital values, which leads to unviable property development
- Speculative development is almost non-existent within the urban centre

It is clearly apparent that new development of business-use premises within the Barnsley urban centre is generally non-viable to private sector, and that ‘market failure’ is prevalent.

5.3 Comments on Strategy

This IDP document sets out the Action Plan to deliver the strategy and objectives presented in the Part A document. In all, seven objectives are identified, the first three of which deal in some detail with property-related issues (although other objectives also have implications for property).

¹ Indicating the probability of the site and premises being developed within the programme period.

There is clear recognition of the need for property activity to satisfy Objective 1 criteria, including linkage with SEZ strategies. This is important to Barnsley, as it adjoins both M1 and Dearne Valley SEZ's. *Such linkages should seek to enhance all three IDP's, rather than create competition between similar opportunities.*

- Objective 1 - Creating Business Districts

Unlike SEZ's, urban centres are well-established complex mixed-use areas, with little opportunity for significant property redevelopment activity. A number of Business Districts are proposed and the key priority of the action plan is to prepare masterplans for them. The plan recognises that these business districts already suffer from a lack of sustained private sector investment, and that - through masterplanning - investment opportunities and mechanisms (including public intervention) will be required. The masterplans will provide a detailed framework for the delivery of key physical projects - including those to be funded through P5. At this stage specific property projects are not identified in detail.

Sector strategies will determine which key business sectors will be promoted in each Business District. These will provide a framework for cluster development.

- Objective 2 - Consistent Marketing Strategy

The Action Plan includes specific provision for marketing of the IDP as part of the overall marketing strategy for the plan. It acknowledges certain existing transitional projects, e.g. the marketing activity of the Barnsley Development Agency, which is included as an eligible activity for Objective 1 support. This addresses one of our major concerns arising from the need to successfully promote new property activities - both within the IDP area and within the context of Objective 1 as a whole, i.e. adjoining SEZ's and sub-region. We consider integrated marketing to be equally important as delivery of suitable premises, given that the effect of Priority 5 could be to flood the market with an over-supply of premises. Stimulation of limited existing demand will be crucial to attracting private sector investment involvement in the process.

- Objective 3 - Providing a Spectrum of Business Accommodation

This is the most substantial element of the programme and seeks to deliver the physical capacity for firms to develop and grow, by meeting the needs of business occupiers. However, it refers to demand evidence study (by GVA Grimley) which information has not yet been made available to us.

The plan acknowledges existing private sector investment as a major delivery constraint and suggests that the public sector will be required to lead, through intervention and other means, where projects will have the greatest overall impact on end user and investor demand. Yorkshire Forward, with Barnsley MBC, will take the lead but opportunities for private sector will be encouraged.

In total, some 41,000 sq m of new and refurbished floorspace is suggested, to provide an improved range and choice of business accommodation.

5.4 Supply & Demand

The Plan recognises that Barnsley Urban Centre clearly suffers from lack of private sector investment – suggesting significant market failure. It promotes public sector led property activity with significant intervention measures.

It would be useful for us to have sight of the GVA Grimley report on the Barnsley property market, from which we can gain a better feeling for the market failure issues and need for intervention in certain cases. The IDP document itself does not support this with any recent statistical analysis or comment of space take up or indeed shifts in market activity – e.g. as might be reflected by property rentals or capital values.

Although we have not been requested to comment on the financial viability of the specific projects put forward for Objective One funding, the minimal amount of data within the IDP document concerning proposed floor space by type, balance of floor space mix or (as previously referred to) analysis of recent take-up or predicted take-up during the IDP programme constitutes a weakness in the presentation. *This will require to be addressed by the Driver Partnership when considering site-specific proposals for Objective One support – whether from private or public sector partners.*

Where private sector schemes are directly or partly involved in the proposed IDP, market confidence in the suitability; deliverability; and sustainability of the appropriate scheme is essential to generate the early support and leverage suggested within the IDP document. *Again, market analysis of rentals, recent uptake, shifts in market trends, advantages in relocation, social issues, transportation etc, will all be necessary factors in the successful delivery and marketing such schemes.*

ANNEX 1:
PART B DELIVERY PLAN TEMPLATE

Part B – Delivery Plan

Actions to deliver the objectives of the IDP

Early public sector improvements/actions required

Identification of projects with key characteristics set out

Schedule of projects containing the following:

- Methodology and delivery vehicles
- Public sector partners
- Private sector partners
- Collaborative partners
- Activities
- Site identification
- Ownership issues
- Constraints
- ERDF funding required
- Public funding
- Private funding
- Phasing
- Relevant deliverability criteria e.g. requirement for planning consent
- Linkages for other priorities for grant
- Sustainability profile – economic and environmental
- Risk analysis

Other Requirements

Plan of IDP area

- Project site plans

Sketch schemes and illustrations

Photographs

Publicity material e.g. posters

Capability to utilise software and electronic facilities

ANNEX 2:

**TRANSPORT AND SUSTAINABILITY ISSUES FROM
THE INITIAL PART A PLAN**

The following issues were highlighted in the appraisal of the Part A plan:

a) Transport and Labour Mobility

- Accessibility issues in relation to many of the development areas not addressed
- No specific proposals to enhance access from targeted communities to newly created employment opportunities.
- No reference to the potential role of green travel plans in promoting sustainable access to employment.

b) Environment

- Absence of any identified actions to promote resource efficiency or encourage activities which use less environmental resources

c) Sustainable Development

- Whilst the plan generally performs well against sustainability criteria there was a failure to explicitly demonstrate its contribution to all cross cutting themes

It should be noted that the following comments were prepared without sight of the revised Part A document and it may be that some of the comments made below have been addressed elsewhere. Indeed, it is appropriate for many of these issues to be fully addressed within the Part A document. However, support for specific actions or site-specific issues should be included within the Part B IDP.

ANNEX 2:

TRANSPORT, LABOUR MOBILITY, ENVIRONMENTAL SUSTAINABILITY AND SUSTAINABLE DEVELOPMENT – INITIAL PART A CONCERNS

Transport, Labour Mobility, Environmental Sustainability and Sustainable Development – initial Part A Concerns

- a) Transport and Labour Mobility
 1. Poor analysis of transport issues
 2. No explicit encouragement for modal shift
 3. No reference to capacity constraints on rail and air modes
 4. Inadequate consideration of cycling and walking as sustainable modes for internal movements.

- b) Environmental Sustainability
 - 1 Does not address issues of resource efficiency and pollution
 - 2 Implication that there is no need to improve environmental performance rather ‘monitor and maintain’.
 - 3 No consideration of use of environmental technologies/practices and how they could be integrated into project delivery (e.g. waste and water recycling, renewable energy, sustainable building design, etc.)

- c) Sustainable Development
 1. The Part A document including no framework for monitoring its impact upon sustainability objectives.