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Dear Mr Richard Gilbert,

BARNSLEY LOCAL PLAN: INSPECTOR'S MAIN ISSUES AND QUESTIONS

Thank you for consulting with the Home Builders Federation on the Barnsley Local Plan.

The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing.

We would like to submit the following comments on selected questions posed within the Inspector's Stage 4 Main Issues and Questions.

Yours sincerely,



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Main Matter 17 – What implications would the proposed reduction in the jobs target have for the objectively assessed need for housing in the Borough and for the plan’s housing requirement figure?

Context – The Planning Practice Guidance states that plan makers should make an assessment of the likely change in job numbers and having regard to the growth of the working age population in the housing market area. Based on the proposed reduction in the jobs target, the demographic modelling indicates that the objectively assessed housing need would be 1134 per year (21,546 over the plan period).

17.1 Is the revised objectively assessed housing need figure of 1,134 per year in the Edge Analytics report (October 2017) (EB56) over the plan period justified and is it supported by clear and robust evidence?

The Edge Analytics Demographic Forecasts report (October 2017) states that the Regional Econometric Model (REM) has been updated and is presented as new evidence within the October 2017 report, with three new scenarios.

The updated REM uses an increased level of economic activity rate for both the ‘Policy On’ and ‘Policy On Netted’ forecasts. The HBF does not dispute that an increase in jobs may lead to increased economic activity rates, indeed increases to the State Pension Age are likely to ensure this is a reality. However, there is no direct evidence to support the realism of the sensitivity rates applied.

The updated REM also sees an improvement in commuting ratios for the ‘Policy On’ and ‘Policy On Netted’ scenarios. It is considered that commuting ratios are particularly difficult to control and in the case of Barnsley are heavily influenced by commuting to jobs in nearby centres such as Sheffield and Leeds. Given that these areas are also seeking growth it is not considered realistic that significant changes to the rate of commuting can be achieved. Furthermore, any changes to commuting patterns would require agreement under the duty-to-cooperate as this would have knock-on effects for the housing requirements in neighbouring authorities.

Table 6 sets out that 1,134 dwellings are needed to meet the employment led ‘Policy On’ ‘CR SENS’ scenario. However, if the assumptions in relation to commuting ratios are brought in line with the latest OBR evidence this increases the ‘Policy On’ figure increases to 1,459 dwellings as set out in Table 7.

As set out in our previous response of 18th August 2016, and is evident from the 2017 5-year supply note, the Council continue to identify a trajectory with levels of completions above 1,459 dwellings it is therefore clear that higher rates of completions can be achieved.

Background Paper 8 seeks to set out the work the Council has undertaken to address the mismatch between the level of jobs growth and the objectively assessed housing growth. It states that the REM produces a jobs figure of 28,840, which the Council consider to be in line with the 26,700 set out in the Jobs and Business Plan. The Background Paper also sets

out that a Sustainability Appraisal has been undertaken by ARUP and that although there would not clearly be significant adverse impacts arising from the pursuit of 1,600 dwellings.

1,134 dwellings each year is considered to be an improvement on the previous figure, and the Edge Analytics report has improved the links with the economic growth proposed. However, it is still considered that this figure is suppressed by some of the assumptions made in the report as set out above.

17.2 Are the commuting ratio and economic activity rate assumptions informing the demographic projections in the Edge Analytics report (EB56) robust and supported by the evidence? Is there any change to the assumptions compared with those made in the earlier demographic report (March 2017) (EB56) and if so what evidence justifies the change?

Please see response to 17.1 in relation to concerns of the HBF.

17.3 Have the sustainability implications of higher levels of housing growth been robustly assessed in the Sustainability Appraisal addendum (SD4)? How have the results in the addendum informed the proposed revised housing requirement?

17.4 Would the proposed housing requirement of 1,134 dwellings per year (21,546 over the plan period) meet identified needs in full and is it deliverable over the plan period?

Please see response to 17.1 in relation to concerns of the HBF.

Main Matter 18 – Whether or not the plan’s housing requirement will be met, including the need for different types of housing and whether sufficient land has been identified to provide a 5 year supply of housing on adoption and throughout the plan period

Issue – Choice and mix of housing

Context – The National Planning Policy Framework (para 56) indicates that local planning authorities should plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community.

18.1 Will Policy H7 provide an appropriate mix and choice of housing over the plan period to meet the needs of different groups in the community identified in the Strategic Housing Market Assessment (EB45)?

18.2 Is the proportion of affordable housing sought in different settlements in Policy H8 justified by the evidence? Are the thresholds and targets justified and based on a robust assessment of economic viability?

The HBF supports the provision of affordable housing providing it is based upon a realistic assessment of viability. The HBF also supports the use of variable affordable housing targets across the district to account for the variations of viability encountered within many districts, where this can be supported by evidence. However, as set out in our previous correspondence the HBF continues to have concerns that the affordable housing contributions are not viable in some of the sub-markets, particularly those in the lower value areas. Whilst the caveat in relation to viability within the policy is noted and supported the HBF do not consider that it should be used to justify an unsustainable policy.

18.3 Apart from delivering affordable housing as a contribution from market housing schemes under Policy H8, what other measures will be available to deliver affordable housing?

The 2017 SHMA Addendum identifies a need for 292 affordable dwellings each year, as set out in our previous comments, this would require a significant proportion (26%) of all dwellings built to be affordable dwellings. The HBF consider the Council need to have a clear plan as to what other measures will be used to deliver these affordable homes, or alternatively to increase the overall housing requirement to contribute to the provision of further affordable homes, consistent with advice contained within PPG (ID 2a-029).

Issue – Housing Requirement and Five Year Land Supply

Context – The National Planning Policy Framework indicates that local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide 5 years’ worth of housing against their housing requirements. The Council’s Five Year Deliverable Housing Land Supply Report (April 2017 – March 2022) (EB182) sets out the latest position in relation to the five year supply and Background Paper 3 Housing provides further information on the plan’s approach.

18.4 Has there been any shortfall in supply against the annual requirement since the start of the plan period (between 2014 – 2018) and what is the residual amount of housing that needs to be delivered?

Based on the proposed housing requirement of 1,134 dwellings each year. It is evident that there has been a shortfall in supply in the period 2014/15 to 2016/17, with less than two thirds of the housing requirement having been provided.

| Table 1: Plan Period Housing Delivery | | | | |
|---------------------------------------|---------------|------------------------------|---------------------|------------|
| Year | Net Dwellings | Proposed Housing Requirement | Over / Under Supply | Cumulative |
| 2014/15 | 622 | 1,134 | -512 | |
| 2015/16 | 706 | 1,134 | -428 | -940 |
| 2016/17 | 856 | 1,134 | -278 | -1,218 |
| Total | 2,184 | 3,402 | -1,218 | |

18.5 How will any past shortfall be recovered – over the next 5 years ('Sedgefield') or over the lifetime of the plan ('Liverpool') and why?

The HBF supports the 'Sedgefield' method of delivery. This requires delivery of any under-supply within the first five years. This is consistent with the principals set out within the PPG (ID 3-035). Any deviation from this methodology must be accompanied by robust evidence.

18.6 Should an additional buffer of 5% or 20% be added to five-year housing land supply as required by the National Planning Policy Framework to significantly boost housing supply? Has there been a record of persistent under delivery of housing and what time period/requirement figure should this be assessed against?

The HBF consider that there has been a record of persistent under delivery of housing over the last 10 years and that as such a 20% buffer should be applied.

The table below utilises the housing requirement from the adopted Core Strategy for the period 2008 to 2014, with the proposed housing requirement utilised for the period 2014 onwards.

| Table 2: 10-year Housing Delivery | | | | |
|-----------------------------------|---------------|---------------------|---------------------|------------|
| Year | Net Dwellings | Housing Requirement | Over / Under Supply | Cumulative |
| 2007/08 | 1,140 | 840 | 300 | |
| 2008/09 | 841 | 1,194 ¹ | -353 | -53 |
| 2009/10 | 556 | 1,194 ¹ | -638 | -691 |
| 2010/11 | 998 | 1,194 ¹ | -196 | -887 |
| 2011/12 | 842 | 1,194 ¹ | -352 | -1,239 |
| 2012/13 | 656 | 1,194 ¹ | -538 | -1,777 |

¹ Core Strategy Housing Requirement

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| | | | | |
|---------|--------------|--------------------|---------------|--------|
| 2013/14 | 747 | 1,194 ¹ | -447 | -2,224 |
| 2014/15 | 622 | 1,134 ² | -512 | -2,736 |
| 2015/16 | 706 | 1,134 ² | -428 | -3,164 |
| 2016/17 | 856 | 1,134 ² | -278 | -3,442 |
| | 7,964 | 11,406 | -3,442 | |

In this case the HBF consider that ten years is a reasonable period of time demonstrating that the situation is one of persistent under delivery, rather than a temporary or short-lived fluctuation.

18.7 Does the housing requirement figure incorporate a sufficient 'buffer' to allow for non-delivery as well as providing sufficient choice and flexibility in the supply of housing land?

Assuming the housing requirement is 1,134 as proposed, this is the same as the identified Objectively Assessed Need and as such there does not appear to be any buffer identified.

The HBF would, as set out previously, recommend that a buffer is provided in terms of the housing requirement or housing land supply to allow for non-delivery and to provide choice and flexibility in the supply of housing land.

It is noted that if the housing requirement is continued to be identified as a minimum figure there would remain opportunities to surpass the overall requirement.

18.8 Based on a plan requirement of 1,134 dwellings per year, would the plan help to ensure the delivery of a 5-year supply of deliverable housing sites in the plan area?

The HBF considers that the Council need to make sure that the Plan will provide sufficient land to ensure the delivery of a 5-year supply of deliverable housing sites.

Table 3 sets out the 5-year requirement based on the information provided by the Council within their 5-year supply note and background paper. As set out in response to 18.4 the HBF believe there has been a shortfall in housing provision within the plan period equating to 1,218 dwellings, and as set out in response to 18.5 the HBF consider this should be addressed using the Sedgefield method. Taking into the consideration the persistent under-delivery set out in response to 18.6 the HBF considers that a 20% buffer should be applied.

| Table 3: Calculating the 5 Year Requirement | | |
|---|---|--------|
| A | Proposed Housing Requirement (2014 – 2033) | 21,546 |
| B | Annual Housing Requirement (= A/19 years) | 1,134 |
| C | Five Year housing rate (= B x 5) (= 1,134 x 5) | 5,670 |
| D | Actual completions | 2,184 |

² Proposed Local Plan Housing Requirement

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| (2014/15 to 2016/17) | | |
|----------------------|---|--------------|
| E | Proposed Housing Requirement expected Completions (= B x 3) (= 1,134 x 3) | 3,402 |
| F | Surplus / Shortfall in housing delivery (= D – E) (= 2,184 – 3,402) | -1,218 |
| G | Five Year Requirement (incorporating surplus / shortfall) (= C – F) (= 5,670 – (-)1,218) | 6,888 |
| | | |
| H | Buffer (20%) (= G x 20%) (= 6,888 x 20%) | 1,377.6 |
| I | Five Year Requirement (incorporating surplus / shortfall and buffer) (= G + H) (= 6,888 + 1,377.6) | 8,266 |
| J | Annual target for next 5 years (= I / 5) (= 8,266 / 5) | 1,653.2 |

It is noted that the five-year requirement set out in table 3 above is greater than the supply as set out by the Council in their 5-year supply document (8,056 dwellings), although it is below the figure including the additional site allocations (9,016 dwellings). However, this is without taking into account concerns set out in response to 18.9 below. The HBF consider that the Council need to ensure that there are appropriate deliverable sites identified within the plan to meet at a minimum this requirement.

18.9 Do the following sources¹ represent a ‘deliverable’ supply of sites to provide a 5 year supply of housing land:

- **Sites with planning permission for 10 or more dwellings - 3203**
- **Remaining Unitary Development Plan proposals - 668**
- **Redundant school sites – 313**
- **Sites with planning permission for less than 10 dwellings - 427**
- **Capacity on sites allocated in the plan – 3964**
- **Windfall – 566**

Total 9141 minus predicted losses of 125 dwellings = 9016

(Could the Council please provide any necessary updates to these figures in its response to the MIQs)

The HBF does not wish to comment upon the acceptability or otherwise of individual sites. It is, however, important that Council’s assumptions on sites in relation to delivery and capacity should be realistic based on evidence supported by the parties responsible for housing delivery and sense checked by the Council based on local knowledge and historical empirical data.

The HBF note that the Council has identified that not all small sites with planning permission come forward to development and that they have used a 60% build out rate.

The HBF have concerns about the continued inclusion of undeveloped UDP proposals and would seek assurance that there is clear evidence that these sites will now come forward, within the 5-year period.

18.10 Do assumptions about previous windfall rates provide a robust basis for predicting future rates? Compared with the Core Strategy policies (EB11), are there any policy approaches in the plan which could change the rate of delivery on windfall sites in the future?

The HBF consider that there is potential for the allocation of housing, combined with a more detailed assessment of housing land availability to reduce the level of windfall development that comes forward. As set out in our previous consultation comments, the HBF also consider it is necessary to consider whether Policy H6 will have any implications for the delivery of housing from windfall.

It is considered that the Council will need to monitor the provision that windfall development is making to the delivery of homes in the Borough to ensure that this supply remains and is continuing to provide additional flexibility and the opportunity to boost housing supply.

18.11 How will the supply of sites be monitored and managed to ensure a rolling 5 year of deliverable sites throughout the plan period?

The HBF notes the monitoring framework set out chapter 26 and recommends that specific monitoring triggers are introduced, such triggers could include, but not be restricted to; persistent failure to meet its housing requirement, lack of a five-year housing supply, and additional household growth information identifying an increased need for new housing. There should also be clearly identified actions as to what will happen, and when, if these targets are not met, for example how long would it be before a final resort of reviewing the plan and introducing new allocations is considered.

18.12 Does Policy H2 provide sufficient flexibility and should it refer to the provision figures in the table as a minimum for consistency with Policy H1?

The HBF considers that Policy H2 should be applied flexibly and should not be used to limit development on sustainable sites once the figures set out have been met. The HBF considers that the figures should be expressed as a minimum in line with policy H1, which should help to avoid this issue.

Main Matter 22 – Whether or not the plan would be viable and deliverable within the plan period and whether the arrangements for monitoring are robust.

22.1 Would the proposed employment, housing and mixed use site allocations be able to accommodate the plan's policy requirements having regard to viability and is this supported by the evidence in the Viability Study (SD22)?

The HBF does not wish to comment upon the acceptability or otherwise of individual sites. It is, however, important that Council's assumptions on sites in relation to delivery and viability should be realistic based on evidence supported by the parties responsible for housing delivery and sense checked by the Council based on local knowledge and historical empirical data. It is clear from the evidence that some areas of Barnsley may struggle to deliver the required amount of housing due to the significant viability issues identified within the Council's evidence base. The Council will need to consider the deliverability of all sites carefully, monitor their delivery and potentially provide additional sites to make good any likely shortfall.

22.2 Is the revised housing trajectory (BMBC030) deliverable over the plan period and how will it be monitored and kept up to date?

22.3 Does the plan have sufficient flexibility to respond to changing circumstances? Should there be a policy or statement requiring an early review of the Plan?

The HBF continues to consider that it is necessary to ensure that there is sufficient housing land available to provide flexibility and choice and to ensure that the objectively assessed need is met. If an suitable monitoring framework is put in place with appropriate targets, triggers and corrective actions this could help to ensure that a review of the plan happens at an appropriate time.