

Barnsley MBC Local Plan Submission

Note on implications of the Housing White Paper on the Local Plan

- 1.0 This note has been prepared in response to the Inspector's letter setting out initial questions dated 14th February 2017.
- 1.1 Barnsley MBC will be preparing a response to the Housing White Paper consultation which closes on 2nd May 2017.
- 1.2 Below are the proposals that we consider have the main future implications on the Local Plan as submitted, should they come into force. Government policy is in a state of potential change and the Council will respond accordingly as and when details are published. It does not wish to commit resources until further detail is available.
- 1.3 The issues below are ordered to correspond with the Housing White Paper Annex which sets out further detail on the proposals with the appropriate reference in brackets.

2.0 Assessing Housing Requirements (A21)

- 2.1 We note the Government's intention to introduce a standard methodology for calculating objectively assessed housing need. However, the fact that the methodology isn't revealed in the white paper means that they will presumably have to consult on whatever their preferred approach is. The timescales for this mean it is unlikely we will have clarity until later in the examination process. Accordingly, when examining whether or not the plan is sound in respect of the overall quantum of proposed housing provision, we consider that the focus of the examination should be on whether or not the proposed housing requirement represents an aspirational but realistic target (NPPF para 154).
- 2.2 Notwithstanding the above, in recognition of your initial question regarding how we arrived at our objectively assessed need figure, we will provide an addendum to our existing SHMA and update our Housing Background Paper.

3.0 Supporting small and medium sized sites and thriving rural communities (A55)

- 3.1 The white paper suggests that on top of the windfall allowance, at least 10% of sites allocated for residential development in local plans should be half a hectare or less. At present our plan includes no housing allocations below 0.5 ha and furthermore, we have set a threshold of 0.4 ha below which we have not assessed sites against our housing site selection methodology. If we are expected to now assess such sites this is likely to be time-consuming and could significantly lengthen the examination process.

3.2 With regard to smaller sites in villages, our approach to housing opportunities is that development will be allowed if consistent with Green Belt Policy and is necessary for the viability of the settlement and to meet local needs (policy LG2). Policy H8 Affordable Housing sets out that limited affordable housing to meet community needs may be allowed in the Green Belt.

4.0 **Green Belt Land (A61 - A64)**

4.1 Many of the issues raised in the proposals we consider to have already been dealt with through Green Belt review and the site selection process, and the need to set out exceptional circumstances to justify proposed amendments to Green Belt boundaries.

4.2 With particular reference to the four bullet points covering where exceptional circumstances may exist, we consider that our plan meets the suggested criteria. This is summarised briefly below:

- Making effective use of suitable brownfield sites and the opportunities offered by estate regeneration:

The housing background paper explains the success we have had in delivering housing on brownfield sites. There are various reasons for this but the most notable ones are that we have not had housing allocations covering the period 2001 (end of UDP Plan period) to the present day. This has placed a significant reliance on windfall sites, many of which have been connected with estate regeneration that was funded through the Housing Market Renewal Pathfinder Programme. The success of this programme has reduced the opportunities to bring forward further regeneration schemes. Areas where estate regeneration has taken place are Goldthorpe, Thurnscoe Bolton upon Dearne, Kendray, Worsbrough, New Lodge, Athersley, Grimethorpe and Wombwell.

- The potential offered by land which is currently underused, including surplus public sector land where appropriate:

We have sought to utilise all suitable housing sites within Urban Barnsley and the Principal Towns. Where sites have not been taken forward, reasons are provided in the rejected sites lists. There is also a significant shortage of public sector land within the borough and any suitable sites are already proposed for housing development within the Local Plan.

- Optimising the proposed density of development:

Core Strategy policy CSP14 sets out our current density targets, which are considered high when benchmarked against historical standards. The Housing Background Paper explains that the densities proposed in the emerging local plan are lower but this is still above what has been delivered in

recent times. We consider that in order to ensure that Green Belt boundaries endure beyond the plan period, it is essential that the density target in the plan is realistic and deliverable.

- Exploring whether other authorities can help meet some of the identified development requirement:

We are proposing to meet our housing requirement in full and are providing a site to contribute towards Sheffield's housing requirement. It is also important to note that all neighbouring authorities are similarly constrained by Green Belt.

- 4.3 One proposal that would affect the Local Plan as drafted is seeking compensatory improvements where land is removed from the Green Belt to the environmental quality or accessibility of remaining Green Belt land. For the proposed allocations that are currently Green Belt this would require further work assessing type and amount of compensation required and incorporating that information into the site specific policies. This would be a further contribution that may impact on the viability of sites.

5.0 Affordable Housing (A120 & A121)

- 5.1 The proposed changes to the definition of affordable housing and the suggested approach to a blanket percentage and minimum threshold would have implications for policy H8 on Affordable Housing as currently drafted but would be dealt with in a review of the plan. We would give consideration to dealing with tenure split and other details in a Supplementary Planning Document.

6.0 Detailed Proposals

- 6.1 In various parts of the white paper the Government sets out its intention to consult on more detailed proposals, such as addressing housing requirements for groups with particular needs. Our plan includes various policies to which this type of proposal could have implications for. Should there be greater certainty on the government's intentions in respect of the detailed proposals or should they come into force through a change to the NPPF before the examination is concluded we would suggest consideration is given to whether or not some of these issues could be dealt with through Supplementary Planning Documents or an early review of the plan.

7.0 CIL Reform

- 7.1 In addition to the proposals set out in the White Paper we are also aware of the proposed CIL reforms set out in "A New Approach to Developer Contributions, October 2016". This document introduces a proposal to develop a Local Infrastructure Tariff that will replace CIL. We do not consider

any material changes will be required to our Infrastructure Delivery Plan as a result of this proposal.

8.0 **Conclusion**

- 8.1 We recognise that the timing of the White Paper and the associated timescales for the consultation are not ideal but we also note the Government's commitment to a plan-led system, which is reaffirmed in the white paper. This is emphasised in paragraph 1.2, which states "We want to ensure that every area has an effective, up-to-date, plan by making it easier for plans to be produced and understood, and simpler to identify the homes that are required". In recognition of this we are in the process of providing an addendum to our SHMA as well as an updated housing background paper with the aim being to provide greater clarity on how we have arrived at our Objectively Assessed Need figure.
- 8.2 The proposals in the Housing White Paper are subject to consultation until early May. Detail on these proposals will then be subject to further consultation. Therefore, whilst we recognise that you will need to have regard to the White Paper, we conclude that at present the Housing White Paper carries little weight, and as such has no implications for the Local Plan as submitted at this time.
- 8.3 Should further details on the proposals become clearer during the examination process we would seek to request main modifications where appropriate. There may be areas where additional changes could be made that make reference to further details being set out in Supplementary Planning Documents.
- 8.4 Should any proposals be likely to come into force that cannot be addressed through main modifications that would jeopardise the Local Plan being found sound, we would consider committing to an early review of the relevant section of the Local Plan.