

BARNSLEY HOUSING DELIVERY TEST ACTION PLAN (2024 - 2025)

CONSULTATION SUMMARY

PREPARED BY BARNSLEY METROPOLITAN BOROUGH COUNCIL

October 2025



**Barnsley – the place
of possibilities.**



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Introduction

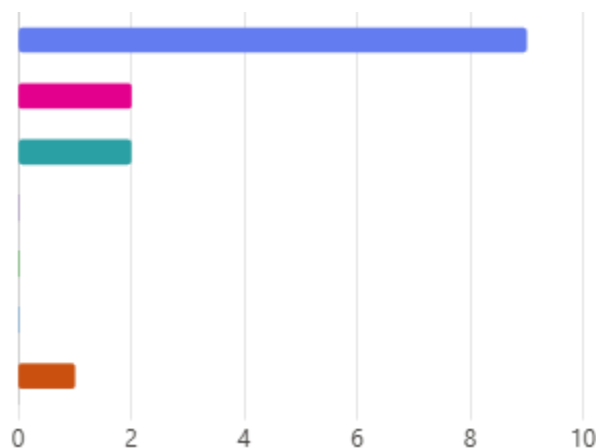
- 1. The Housing Delivery Test Action Plan has been produced to investigate the reasons for the under delivery of new housing in Barnsley, as measured under the 2023 Housing Delivery Test, and to put in place measures to speed up housing delivery.
- 2. Targeted consultation took place on the draft Housing Delivery Test Action Plan between 4th June 2025 and 27th June 2025.

Who we consulted

- Landowners
- Housing Developers
- Land promoters
- Infrastructure Providers
- Public bodies
- Neighbouring Local Authorities

Who responded

- 3. We received 14 responses, predominantly from landowners. The ‘other’ was a planning agent. No responses were received from infrastructure providers, adjoining LPAs or any other public bodies.



a land owner	9
a housing developer	2
a land promoter	2
an infrastructure provider	0
a local authority	0
a public body	0
Other	1

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Response to Consultation

4. The table below summarises the main issues raised during consultation and the Council's response.

Summary of responses

Comment number	Summary of comment	Response
Introduction – Housing requirement		
1	Noted HDT test figure will decline to approximately 67% given the increase to the standard method figure from 831 to 1092 dpa; and considers how this additional challenge should be addressed in the action plan. Suggests there is the potential and opportunity to scale up housing delivery through strategic partnerships. See significant potential to support BMBC in strengthening delivery through strategic collaboration.	Whilst the extent of the potential impact is not agreed, it is acknowledged that the Local Housing Need (LHN) figure calculated using the new standard method (as published by MHCLG in December 2024), will result in additional challenges to meeting future Housing Delivery Test (HDT) requirements. The new LHN is 944 dwellings per annum (dpa), not the 1092 dpa suggested. The 1092 dpa figure was the summer 2024 consultation draft figure, which was superseded by the final figure published by MHCLG, alongside the associated changes to NPPF/NPPG in December 2024. However, this action plan is appropriately prepared on the basis of the 2023 HDT measurement, as published in
2	Agree with the need for the action plan and considers that it should reflect the updated standard method figure.	

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		December 2024. Future iterations of the action plan will be updated accordingly.
Introduction – Housing delivery/5 year land supply		
3	The estimated delivery is well under requirement, and the introduction is not clear as to whether any mitigation measures or alternative policy provisions exist.	The purpose of the action plan is to reflect on the extent and reasoning for the under delivery of housing and to set out how the Council, alongside associated partners, intends to speed up housing delivery. A sentence has been added to the introduction to clarify where the proposed actions are located, within the Action Plan.
4	The problem is likely to get worse as housing is not being delivered fast enough and the units that make up the 3.1 years supply are not progressing quickly enough to positively impact delivery targets.	The action plan acknowledges that housing has not been delivered at the rate that was anticipated when the plan was adopted. It is the purpose of the action plan to put in place measures to speed up the delivery of housing.
5	Suggests further review of the 5yrs figure to be undertaken, to include realistic delivery rates and removal of any category B sites.	The action plan is not directly related to the 5 year housing land supply, which will be reviewed separately.
Introduction – Delivery of MU1		
6	Concern/lack of clarity over the length of time it is taking to bring forward development associated with	The Action Plan addresses delays in determining planning applications, including those that are the subject of

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	the Barnsley West Masterplan Framework (MU1), despite significant preparatory work.	masterplan frameworks. However, planning permission has since been granted (subject to Section 106 agreements) for part of the MU1 site that includes 216 dwellings in the shorter term, with a reserved matters application to follow for over 1300 dwellings.
7	Housing delivery performance would be hugely improved if the long standing Barnsley West proposal were to proceed to a successful conclusion.	
Introduction – Housing site deliverability updates		
8	Notifications received relating to site availability and deliverability.	Comments noted
Section 2: National and Regional Housing Market - Delivery Analysis		
9	Lack of analysis of whether differing policies on the amount of affordable housing provision, transport contributions etc has an impact on delivery across the region.	Viability analysis on planning policy requirements in Barnsley was undertaken previously. This will be refreshed as necessary, and further analysis will be considered for future iterations of the Action Plan. A review of site viability to determine the funding gap is included as a corrective action in table 1.
10	Lack of assessment of the type of sites being delivered and the impact of developer contributions (i.e. are sites with mitigating factors and therefore limited developer contributions coming forwards over those with significant requirements?)	

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11	No analysis of decision making timescales and impact on delivery. Considers BMBC has a long lead-in time for determining applications from submission to determination, worsened by inability to speak to planning officers to resolve minor issues efficiently.	This issue is addressed through the commentary of the action plan. Some of the proposed measures are designed to improve the decision making process. Examples of improvements underway, most of which are included in table 1 of the action plan, are: • Planning and Building Control newsletter that aims to keep key stakeholders informed and up to date with national and local planning issues • Stressing the importance of submitting good standard pre-apps to improve quality. • Limiting number of amendments and revisions to plans • Addressing technical issues that have caused previous delays such as software used to process planning applications. • Recruitment to vacant posts • Change in telephony system • Ensuring Local Validation Checklist is clear and up to date to ensure good quality planning applications are submitted with all the relevant information. Applicants often take some time to submit revisions. Where a quick turnaround is requested, we do our best, however

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		time must be allowed for consultees to respond and further public consultation where necessary.
12	Delivery of MU1 would massively improve the Council's performance in housing delivery.	See above response to comments 6 and 7
13	A small landowner has been involved in MU1 project for 20+ years, and still not started.	See above response to comments 6 and 7
14	The Savills analysis cited demonstrates market volatility but ignores the fundamental mismatch between market-led delivery and housing need. The "grim outlook" acknowledges falling consents and shrinking pipelines - yet the action plan offers no substantive departure from failed market mechanisms. South Yorkshire comparison data (Appendix 1) shows systematic regional underperformance. Barnsley's volatility (563-1,328 homes annually) reflects market dependency rather than strategic planning. This volatility will intensify under presumption policies.	Comment noted.
15	Brexit (2020) and Covid lockdowns (2021) explain the sudden drop in delivery but cannot be blamed for the slow recovery. Cost of living crisis and materials cost inflation are/were current challenges, but if it's not	Comment noted. These issues are considered relevant to the current action plan. Any future iterations of the action

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	these then it will be something else. The Council needs to be aware of these commercial challenges and become part of the solution not just another challenge we have to overcome.	plan will reflect challenges that have affected delivery at that time.
Section 3: Local Housing Market - Delivery Analysis		
16	Masterplans and policies are all well and good, but like any business to expect each and every site and every developer to be bound in identical terms will continue to result in delays as not all sites and companies can conform if development is to be accommodated in an economically viable way.	Local Plan policies and Masterplan Frameworks are there to give the community and developers more certainty. All Masterplan Frameworks were subject to public consultation.
17	Considers that ecology requirements are often difficult to navigate, referencing limited ecologist officer resource. An example given where an issue may have been able to have been resolved in a telephone call rather than the production of costly amended mitigation plans.	The Council has two planning ecologists. It is recommended that pre-application advice is sought to ensure clarity on what information is required, and what is considered acceptable on a site, or what mitigation may be required. The Local Validation checklist makes clear what surveys are needed to support applications and will be updated as required in line with the corrective action in table 1. Information on survey seasons is contained in the table towards the end of appendix 1 of the Local Validation Requirements.

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18	Recognises that Green Belt and safeguarded sites are taking up time but also refers to BMBC resource required to defend appeals for unauthorised Traveller sites. Considers the LPA to have been ineffective in resolving the large number of unauthorised traveller sites in locations inappropriate for residential development, as a direct result of the LPAs failure to provide sufficient traveller sites. To free up more resources it would be beneficial to provide sites for travellers.	Comment noted.
19	Dispute the speed of delivery of planning decisions, citing personal and shared experience of delays to the decision making process. Examples included: • Planning officers unaware of full suite of documents submitted, resulting in requests for information that has already been provided. • Planning officers unaware that planning fees have been paid, citing a resultant 5 week delay to application validation. • A policy compliant, minor scheme taking a year to determine.	See response above to comment 11.
20	Further critical Analysis of delivery trends given.	Comment noted.

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	Historical data reveals three distinct periods: • 2001-2024 average: 861 homes/year • Local Plan period (2014-2024): 815 homes/year • Post-adoption (2019-2024): 735 homes/year • Pre-COVID peak (2016-2020): 1,035 homes/year The peak period (2016-2020) delivering 4,140 homes gave HDT a "running start" but masks underlying structural failure. Post-COVID performance has collapsed to 67% of target, creating an accelerating shortfall. Key Observation: The delivery data suggests strategic opportunities around timing and scale. BMBC's strong performance during 2016-2020 (1,035/year average) demonstrates the borough's capacity for enhanced delivery when conditions align. It is believed this performance can be sustained and expanded through strategic partnerships.	
21	MU1 project will vastly increase supply in the area. Although the proposed housing may not be	Comment noted. See response above to comments 6 and 7.

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	"affordable" its availability will free up existing more affordable properties.	
22	Lack of Flexibility - The Masterplan frameworks served to steer the larger developments but in some cases are outdated. Sticking rigidly to them in the face of opposition from the local community and statutory consultees, whilst ignoring betterment offered by an alternative approach is obtuse and creates significant delays.	The local planning authority considers it has allowed flexibility where appropriate to do so.
23	Lack of commerciality - BNG, increasing Section 106 costs, design and density constraints (sometimes contrary to market demand) and the level of consultation that has to be endured, all impact viability and profitability. It takes a considerable amount of time to review, redesign and reappraise sites, all of which lead to delay. The level of information required is out of proportion and in some cases of no material benefit. (A "well-being survey" for a residential development for example)	BNG is mandatory. It is recommended that pre-application advice is sought to cut out need to redesign and reappraise sites. All supporting information required is crucial to enable a robust planning decision to be made. The HIA is not additional information it should be based on information already required, and health and well-being are central to planning, emphasised by NPPF. Viability assessments include developer profit.
Section 4: Review of Key Issues and Challenges - Root Cause Analysis		

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24	More discretion needs to be applied, where guidance is provided within policy, it needs to be read as guidance not a regulation. This would allow for sensible flexibility.	Comment noted.
25	With reference to the view that the shortage of housing supply generally must be addressed as a matter of urgency, for as long as there are those in society who do not have their own homes, offers an assumption as to the delay in bring MU1 forwards. Cites local opposition and lack of recognition of the general benefit to society.	See response above to comments 6 and 7.
26	While macro-economic factors explain recent delivery challenges, suggest opportunities to enhance delivery through partnership approaches that address structural capacity rather than relying solely on market mechanisms. Key partnership opportunities suggested include: • Enhanced RP partnerships leveraging borrowing capacity and grant funding access • Land value optimisation through strategic assembly and value capture	Comment noted.

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	• Development delivery vehicles such as municipal housing companies or joint ventures • Alternative tenure innovation including Community Land Trusts, cooperative models, and rent-to-buy schemes Note the focus on process improvements but suggest additional emphasis on delivery mechanism enhancement to achieve sustainable long-term performance.	
27	Incomplete information from planning department cause of delay in planning application review/approvals.	Specific example not given. The local planning authority has numerous SPDs and guidance. Would need to know the specific issue to look into what further information the Council could provide. The action plan deals with delays in determining planning applications. Pre-application advice is recommended.
28	Reflects on resource constraints that impact the delivery of sites in part Council ownership that could be best delivered through collaboration.	BMBC Estates and Strategic Housing Teams are in the process of recruiting additional personnel resource.

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	Constraints cited include: • Personnel to advise on the education requirements (size, design, utilities) • Resources to contribute to the cost of advancement (topographical surveys, ground investigation etc). • Capacity gaps, either the lack of personnel or the lack of personnel with the requisite experience/authority to promote the site. Suggest the appointment of a BMBC project manager ('ringleader') for large strategic sites who can coordinate the various departments and deal with internal political conflict. For example, BNG and density requirements are diametrically opposed.	
29	It is appreciated that time is lost on non-compliant applications and appeals but maybe with better engagement and a degree of flexibility these situations could be avoided in the first place.	Pre-application discussions are welcomed and encouraged. Each application is determined on its own merits.
Section 5: Issues not considered to be affecting delivery		

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30	Question the viability assessment for financial burdens associated with development given it was based on March 2024 data, which was prior to rises in national insurance, minimum wages and employers tax contributions as well as the knock on effects for employer based pension contributions. The 2024 figures do not take into account those increases or how they will have an effect on the delivery of sites nor how those added into the £13000 per dwelling requirement will affect viability. Whilst at the current time no additional burden has been added to corporation tax, a contingency needs to be integrated as to how that will play its own role and whether all those external factors should actually be considered against the other financial burdens placed on sites as part of the planning conditions.	Viability analysis on planning policy requirements will be refreshed as necessary, and further analysis will be considered for any future iterations of the Action Plan. A review of site viability to determine the funding gap is included as a corrective action in table 1.
31	Suggest section 5.4's assessment of planning obligations could benefit from enhanced analysis. While the March 2024 viability work provides valuable insights, our experience suggests opportunities for more sophisticated approaches to affordable housing delivery that balance viability with community need. The conclusion that "other factors such as density,	See response above to comment 30.

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	build costs and sales value are more likely to have a significant bearing" highlights opportunities for partnership approaches that address these factors systematically rather than on a case-by-case basis.	
32	Decision making - Applications should adhere to national and local planning policy. However, compliance with Masterplans that were set over 5 years ago without taking into account any mitigation, betterment or the desires of the local community should be challenged to ensure the right result for the community.	See response above to question 16.
33	Respondent had previously had positive negotiations with a housebuilder which failed with the amount of S106 required, the housebuilder decided the extra burden made the project unsustainable.	Comment noted. See response above to question 30.
34	Review reasons masterplan sites have stalled. Many of these sites have stalled to date due to viability and challenges associated with bringing multiple landowners together.	With regard to viability see response above to comment 30. The scale and nature of the masterplan framework areas means that delivery is complex.

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35	Sites on the periphery of masterplans, which could be delivered as standalone sites, should be considered favourably on their own merits, as they would support the significant undersupply of housing and are located on sites already considered acceptable for residential development.	Sites will be considered on their own merits.
36	Disagree with 5.3, if allocated sites have not come forward since the adoption of the Local Plan in 2019 the Local Planning Authority should be considering the barriers to delivery of these sites, and provide policy mechanisms to unlock their potential.	Table 1 includes some corrective actions on stalled sites.
Section 6: Extent to which issues are within BMBC control		
37	BMBC needs to be more flexible and pragmatic in its approach and adopt a dynamic approach to tackling difficult solutions that would stop delivery being slowed down or stagnating. Supporting developers by losing the additional site financial contribution burdens would be something that the authority could look to achieve.	Section 106 requirements are there to ensure community and infrastructure needs resulting from the development are met to make it acceptable.
38	Support for the Corrective Action List shown at Table 1 but question its achievement.	Comment noted. Corrective actions will be monitored to review their effectiveness.

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39	Raise an additional issue that is in BMBC control. Consider the prevalent attitude within BMBC planning (and possibly wider within the authority), to be confrontational, dictatorial and lacking communication as opposed to being positive with a sense of partnership. In short builders prefer to go to other areas than BMBC where the reception is much more positive and progressive.	Comment noted.
40	While Section 6.1 correctly identifies macro-economic constraints, there are significant opportunities for enhanced local intervention that could substantially improve delivery outcomes. Councils possess considerable powers that could be deployed more systematically: • Strategic land assembly and direct delivery • Enhanced partnerships with registered providers • 100% affordable housing delivery on public land • Community Land Trusts and alternative tenure models • Joint ventures leveraging public assets	The Council would consider wholly affordable schemes on a case by case basis; and encourage Registered Providers to engage with us at an early stage. The Council would look at needs in a particular sub-market area to determine support for a wholly affordable scheme. Table 1 refers to the Housing Strategy. As part of implementation of the strategy, officers are also exploring a range of alternative delivery mechanisms for Council-owned assets to maximise market and affordable housing delivery.

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	BMBC's existing strengths in strategic planning and asset management provide an excellent foundation for expanding these approaches.	
41	Planning department comments and requirements need to be structured instead of issued piecemeal.	Comment noted. Specific examples would be helpful to assist process improvement. Case officers complete an initial assessment and ask for comprehensive information that is apparent at that time. However, it is not efficient for officers to wait for consultee responses before doing this, and consultees may make additional requests. Amended plans may also flag up additional issues. Pre-application advice is encouraged.
42	BMBC is well placed to address many issues that are retarding delivery. A strong and empowered management team that can deal with opposing departmental views; that understands the challenges being faced; that adheres to national and local planning policy but can work with developers to address issues and is open minded to alternative solutions that provide betterment for the community. Relying on an out-dated masterplan without any real explanation is frustrating delivery and causing delays.	See response above to question 16.

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43	The Local Planning Authority could undertake a review of stalled housing allocations to understand why they have not delivered and provide support, through the use of policy considerations to support their future delivery.	Comment noted, further monitoring and analysis will be carried out.
44	Preparation of a new Local Plan that includes policy mechanisms to support the delivery of masterplan sites.	Comment noted. Local Plan review timetable to be agreed in due course.
Section 7: Key actions and responsibilities		
45	The Authority needs to consider investing more in the delivery of its own affordable housing supply. For years there has been a lack of investment, the money from right to buy has not be put into the delivery of new council properties and it is not a fair burden for the private sector to continually be expected to deliver more funding for affordable or social housing, the LPA need to look at how it can be more efficient in delivering these. Similarly, if the LPA looks to bring forwards its own sites, these should not be brought forwards at the expense of private sites, any funds obtained from those sites should be utilised fully to	Table 1 refers to the Housing Strategy and other Council strategies that seek to address these issues.

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	subsidise all the same things that privately developed sites are used for alongside the delivery of social and affordable homes.	
46	Raises issues surrounding willing landowners, land availability and cites examples where this is complicated by multiple land ownership of sites, and the existence of small ransom strips stalling wider site progress. Considers there should be a compulsory purchase option to unlock the wider development.	Comment noted.
47	Considers that BMBC needs to realise that not all sites have a huge value for sale for housing. Examples of additional financial burdens affecting land values (and decisions regarding the sale of land) and therefore to be absorbed by the landowner are cited, including: • Ransom strips • 30% planning gain to be paid to the previous owners • Significantly increased capital gains tax as direct result of the Labour Government's new policy.	See response above to question 30. Price paid for land and capital gains tax are not planning issues and therefore cannot be taken into account in determining planning applications.
48	Support for the proposed actions	Comment noted.

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49	Suggest additional partnership approaches that could significantly enhance delivery outcomes. Key opportunity: Enhanced registered provider partnerships to complement existing initiatives. Enhanced Partnership Actions: • Strategic Affordable Housing Partnerships • Opportunity to commit to enhanced affordable housing delivery on council disposals - current "Policy H7 plus" approach could evolve toward more ambitious targets • BMBC's existing structure demonstrates strong foundations: Berneslai Homes ALMO excels at housing management via HRA, presenting opportunities for complementary development partnerships • Enhanced municipal delivery vehicle could bridge development gap - distinct from Berneslai Homes' management role, focused on strategic development delivery • From RP perspective: strategic partnerships enable retained nomination rights whilst leveraging borrowing capacity and grant funding	Comment noted. Table 1 refers to the Housing Strategy and other Council strategies that seek to address some of these issues.

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	access, including the new £39bn AHP with social rent focus - Joint venture opportunities can scale beyond current acquisition-focused approach to comprehensive development programmes Economic Rationale for Affordable Focus Barnsley's economic profile demonstrates perfect conditions for affordable housing prioritisation: - Housing Affordability Crisis: Median house prices £165,000+ against average household income £28,400 creates 5.8x income multiple, excluding 60%+ of households from homeownership - Private Rental Affordability Gap: Average private rents £550-650/month exceed Local Housing Allowance rates (£416/month for 2-bed), creating £134-234 monthly affordability gap for benefit claimants - Mortgage Accessibility: £28,400 average income supports maximum mortgage of £142,000 at 5x income multiple, insufficient for market housing across all sub-markets	

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	• Economic Growth Dependency: Regional economic growth strategy dependent on retaining skilled workforce—impossible without affordable housing provision matching wage levels • Regional Comparison: Neighbouring authorities developing municipal housing companies whilst Barnsley relies on failed market mechanisms Municipal Housing Company - Strategic Development Opportunity BMBC's existing structure presents excellent foundations for enhanced delivery: • Berneslai Homes ALMO: Demonstrates BMBC's success with specialist delivery vehicles - proven excellence in housing management, repairs, maintenance through HRA • BMBC strategic oversight: Strong track record in acquisitions, disposals, Right to Buy administration, strategic planning • Current £43M programme: Valuable foundation delivering 200 homes over 5 years, with potential for strategic scaling	

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	Partnership opportunity: Enhanced municipal housing delivery vehicle focused on development, complementing rather than replacing existing strengths. This could: • Build on existing HRA rental income streams and financial management expertise • Access Homes England £39bn AHP at scale through RP partnerships • Retain democratic oversight while achieving enhanced development pace • Target 500+ homes annually through strategic partnerships and expanded capacity Direct Delivery Expansion • Scale up in-house delivery beyond 200 homes over 5 years • Establish municipal housing company • Revenue borrowing for affordable housing investment	

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Section 8: Project management and monitoring arrangements		
50	The timescales are already overdue and require amending.	Comment noted, timescales are addressed in the final version.
51	There should also be more long stop dates by which the LPA needs to act, it's no benefit to leave these undated or ASAP, what could be reasonably expected of one action might not be the same time scale for another.	
52	In the interests of efficiency and transparency the Authority should be accountable for failures on deliverance. This would also assist in creating a more development supporting culture that recognised the importance of swift and timely delivery of management and monitoring.	Comment noted.
53	The Plan-Do-Check-Act cycle requires outcome-focused metrics: • Affordable housing completions by tenure type • Average sale/rent prices vs. local incomes • Land value capture per dwelling	Comment noted.

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	Time from consent to completion by developer type	
In your view, are there any additional issues and challenges to housing delivery that have not been included in the draft action plan?		
54	The action plan should recognise the default position of planning, the presumption for planning permission, where a local planning authority should grant a planning application if it is in accordance with the development plan, and there are no material planning considerations which would justify refusal. It is felt this seems often to be overlooked and the LPA apparently searching for a reason to refuse.	We would be interested in seeing specific examples. We strongly refute this assertion as the local planning authority aims to give permissions to appropriate, well designed, policy compliant developments. Proposals must be sustainable in line with NPPF requirements, and the Local Planning Authority need to consider all other material planning considerations. The development plan must be read as a whole in weighing these considerations.
55	The bare minimum of conditions should be attached to a planning consent, not additional ones simply to create controls that are not of benefit or that will merely be the subject of a change of conditions application at a later date.	The local planning authority ensures all conditions meet the statutory, legal tests. Table 1 refers to corrective actions to ensure the local validations are clear, improve the quality of submissions and reduce the number of pre-commencement conditions.
56	Consider that the current government's stated objective of simplifying the planning process will if	Comment noted.

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	successfully applied be for the benefit of society as a whole.	
57	Whatever has been the cause of the huge delay in the Barnsley West Masterplan must be overcome as a matter of urgency.	Please see response above to comments 6 and 7.
58	NPPF Standard Methodology Impact and Strategic Response The increase from 831 to 1,092 homes annually (31% uplift) under revised NPPF standard methodology presents delivery challenges that require strategic response: • Current 735/year delivery represents 67% of new requirement (vs 88% of previous 831/year requirement) • HDT performance may decline to approximately 67% within 2-3 years without intervention • Strategic opportunity: With HDT published annually in December, the next measurement (December 2025) presents a defined timeline for enhanced delivery initiatives • Partnership window: Strategic partnerships implemented over the next 24 months could	Comments noted. We are currently using the Local Plan figure of 1134 dwellings per annum.

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	significantly strengthen delivery before policy implications intensify	
59	Five-Year Land Supply Crisis Current 3.1-year supply already breaches the 5-year requirement. Recalculated against: - Increased NPPF methodology (1,092/year vs 1,134/year) - Accumulated shortfall from previous years 20% buffer requirement The realistic supply position deteriorates to approximately 2.8 years, significantly below the 5-year threshold.	Comment noted.
60	Imminent Presumption Risk Combined HDT underperformance and 5YLS deficit trigger presumption in favour of sustainable development within 24 months. This will: Override local plan allocations	Comment noted.

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	• Enable speculative development on inappropriate sites • Undermine Section 106 negotiations through viability challenges • Destroy local democratic planning control	
61	Affordable Housing Crisis • Current delivery provides minimal affordable housing relative to need • Market housing increasingly unaffordable for local residents • Social rented stock depleted through Right to Buy • No strategy for social rent equivalent provision	Table 1 refers to the Housing Strategy and other Council strategies that seek to address these issues.
62	Climate and Sustainability Deficit • No reference to zero-carbon housing requirements • Missing retrofit strategy for existing stock • No reference to 20-minute neighbourhood principles • Infrastructure-led development approach absent	This action plan is focussed on housing delivery.

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63	As the Local Planning Authority does not have a 5-year supply of deliverable housing, all applications at present should be considered in line with the presumption in favour of sustainable development.	Comment noted.
64	Masterplan sites, specifically Royston (reference MU5), have stalled due to the challenges involved in bringing together multiple landowners. Policy constraints and viability issues have also impacted the delivery of this wider masterplan site. Further consideration should be given to large-scale masterplan sites where several standalone applications on peripheral sites could come forward in isolation. All allocated sites have already been assessed as acceptable, suitable, achievable and deliverable in the current Plan period, for residential development. More detail is provided for a specific part of MU5 which it is considered could be brought forward in isolation.	All sites will be considered on their own merits.
65	Site allocation planning history provided including allegations of mishandling of a series of planning applications. Offer to meet with the Council and developer to progress site forwards.	Comment noted.

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66	Referenced a separate parcel of land owned.	Comment noted.
In your view, are there any additional potential measures to speed up housing delivery that have not been included in the draft action plan?		
67	A tick box exercise in that if a development complies with land usage as allocated, has all reports submitted with realistic and reasonable measures put forwards, these should be capable of being signed off and a decision noticed granted within 8-12 weeks. Planning officers should be available to speak to not simply contacted by email as it is almost impossible to speak directly to an officer.	This does not describe the planning process; each case should always be considered on its own merits. See response above in response to comment 11. A change in telephony system has resolved some technical issues with direct contact.
68	Sweep aside objections by NIMBY's on the basis that they are driven by selfish attitudes to the protection of the value of their own homes.	Comment noted. The Council has a duty to listen to issues raised by all parties.
69	Always evolution rather than revolutionary approaches Required Municipal Housing Renaissance: • Establish Barnsley Community Housing Trust • 100% affordable housing policy on all public land	Comments noted.

BARNSELY HOUSING DELIVERY TEST ACTION PLAN (2025 – 2026)
CONSULTATION SUMMARY

Comment number	Summary of comment	Response
	• Revenue borrowing programme scaled to need (minimum 500 homes/year) • Partnership with trade unions for direct labour delivery Land Reform Agenda: • Systematic mapping of land banked sites with planning consent • CPO strategy for sites with delayed implementation • Community Land Trust establishment programme • Agricultural land acquisition at current use value plus uplift Alternative Delivery Models: • Community-led housing enabling team • Self-build cooperative programmes • Modular/offsite construction initiatives • Housing association joint venture vehicles	

BARNESLEY HOUSING DELIVERY TEST ACTION PLAN (2025 – 2026)
CONSULTATION SUMMARY

Comment number	Summary of comment	Response
	Conclusion Barnsley's HDT performance represents more than statistical failure - it signals the imminent collapse of local planning sovereignty. The current trajectory will trigger presumption in favour of sustainable development, unleashing speculative development that serves private profit over public need. The choice is stark: Evolutionary intervention through 100% affordable housing policies and direct delivery expansion; or surrender planning control to market forces through presumption policies. The action plan's market-led incrementalism guarantees failure. Only fundamental departure from profit-driven delivery toward social housing provision can avert the planning sovereignty crisis. Partnership Recommendation: Support enhancing this action plan through strategic affordable housing partnerships that complement BMBC's existing strengths whilst building delivery capacity to meet community needs. Believe Barnsley has excellent foundations for enhanced delivery through strategic partnerships. The combination of BMBC's strategic assets, Berneslai Homes' management excellence, and registered provider partnerships could deliver transformational	

BARNSELY HOUSING DELIVERY TEST ACTION PLAN (2025 – 2026)
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	change within the 24-month strategic window available.	
70	Recommends that Barnsley Council undertakes a review of the adopted Barnsley Local Plan to include a robust assessment of the likely delivery of allocated housing sites. The review should also consider the allocation of potential new housing sites, alongside a green belt review utilising the funds provided by central government and consider the release of “grey belt” opportunities. The review would, of course, need to take on board recent changes to government planning policy; including the revisions to the NPPF. We note that since the adoption of the Barnsley Local Plan in 2019 housing delivery in the borough has significantly decreased. Taking the information provided in Appendix 1 of the Housing Delivery Test Action Plan over the 3 year period 2020/21 to 2022/23 housing delivery has decreased by over 26% from the previous 11 year average. This is in contrast with the other boroughs in South Yorkshire which have all seen increases over their previous 11 year averages; Doncaster (11% increase), Rotherham (25% increase) and Sheffield (61% increase). If Barnsley Council can	Comments noted. Local Plan Review timetable to be agreed in due course.

BARNSELY HOUSING DELIVERY TEST ACTION PLAN (2025 – 2026)
CONSULTATION SUMMARY

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	only demonstrate a 3.1 year housing land supply figure against a minimum 5 year requirement it will be vulnerable to speculative planning applications on unallocated or protected land (as the Housing Delivery Test Action Plan notes). Recommend that a review of the adopted Barnsley Local Plan is undertaken without haste to prevent ad hoc planning applications being made and to provide proper direction to future housing provision in the borough.	