

Housing Delivery Test Action Plan 2024 – 2025

**Consultation Draft
(May 2025)**

Housing Delivery Test Action Plan

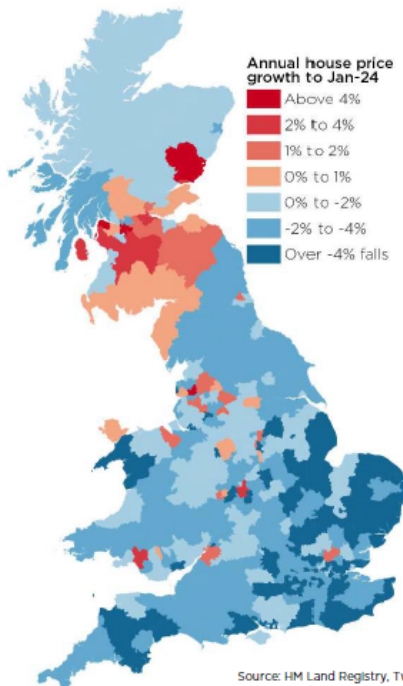
1.0 Introduction

- 1.1 The Housing Delivery Test (HDT) is used by The Government to monitor whether local areas are building enough homes to meet their need. The HDT compares the number of homes delivered over a 3 year rolling period against the housing requirement for the same period and is published annually. It is a tool to determine to what extent the target for new homes with the benchmark of 95% has been met and to determine what steps a Local Authority will need to take to boost housing supply and delivery.
- 1.2 This action plan has been produced to investigate the reasons for the under delivery of new housing in Barnsley as measured under the Housing Delivery Test (HDT) published in 2024, and to put in place measures to speed up the delivery of housing.
- 1.3 Barnsley's housing requirement is set out in the adopted Local Plan (2019, reviewed 2022). Policy H1 seeks to achieve the completion of at least 21,546 net additional homes during the plan period (2014 to 2033). This gives an indicative annualised figure of 1,134 per annum, an ambitious and aspirational figure which addresses housing needs and supports economic growth ambitions.
- 1.4 Barnsley's Housing Delivery Test performance for 2023 was measured at 84%, as published by Government on 12 December 2024.
- 1.5 The Council's latest estimated five year housing land supply position at the base date of 1 April 2024, is that 5708 net dwellings can be delivered against a requirement of 9215 net dwellings, equating to a 3.1 years supply.

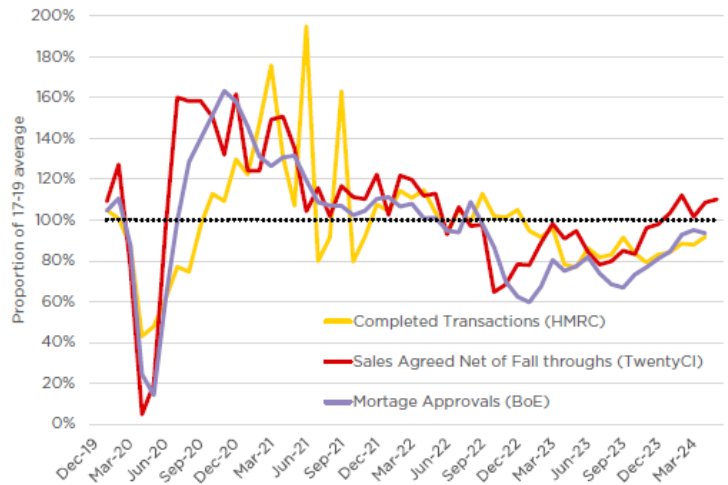
2.0 National and Regional Housing Market – Delivery Analysis

- 2.1 The national housing market is not favourable at present in terms of delivery and supply. However, according to research done by Savills set out in a presentation delivered in June 2024, 2024 has been more positive than recent

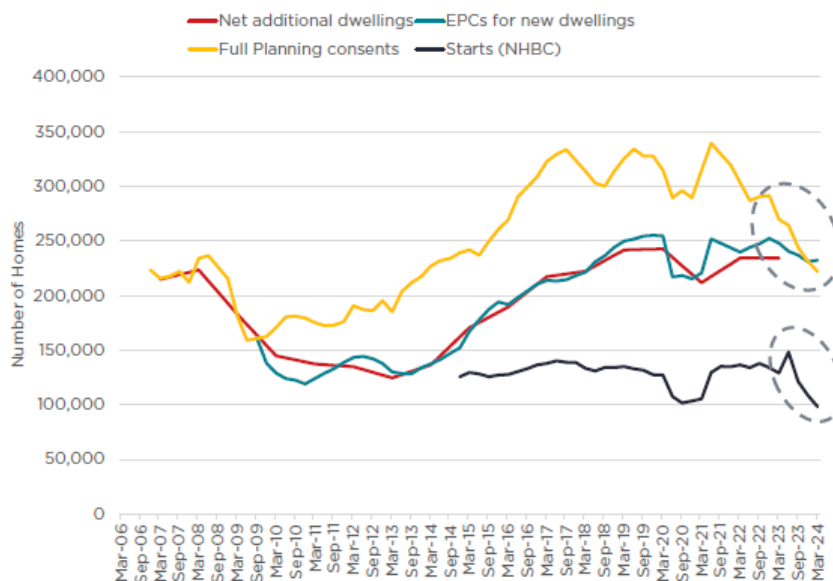
years.



Market conditions certainly more **positive** than 2023



Grim outlook for housing supply



Source: Savills Research using major housebuilder reports, DLUHC, Glenigan, NHBC Residential Construction portal

Sales rates are down:
Weak sales market
No more Help to Buy

2023/4 will be OK, boosted by:
Increased affordable
A good year for Build to Rent completions

But the outlook is weak:
Rapidly falling consents
Very low levels of starts
Shrinking pipeline under construction

- 2.2 The Government records completion figures across the country which can be found here:

https://assets.publishing.service.gov.uk/media/667c25e95b0d63b556a4b3bf/Housing_Statistics_June_2024.pdf

<https://www.gov.uk/government/statistical-data-sets/live-tables-on-net-supply-of-housing>

Appendix 1 provides an extract from table 122 housing supply net additional dwellings by LA district England. This shows the completion figures of the four South Yorkshire authorities since 2009/10 to 2022/23. This demonstrates the fluctuation in delivery rates and the cyclical nature of housing delivery.

3.0 Local Housing Market - Delivery Analysis

3.1 Barnsley Housing completions

Chart 1 below shows the level of housing completions (gross and net) since the start of the Local Plan period.

Chart 1: Gross and net housing completions

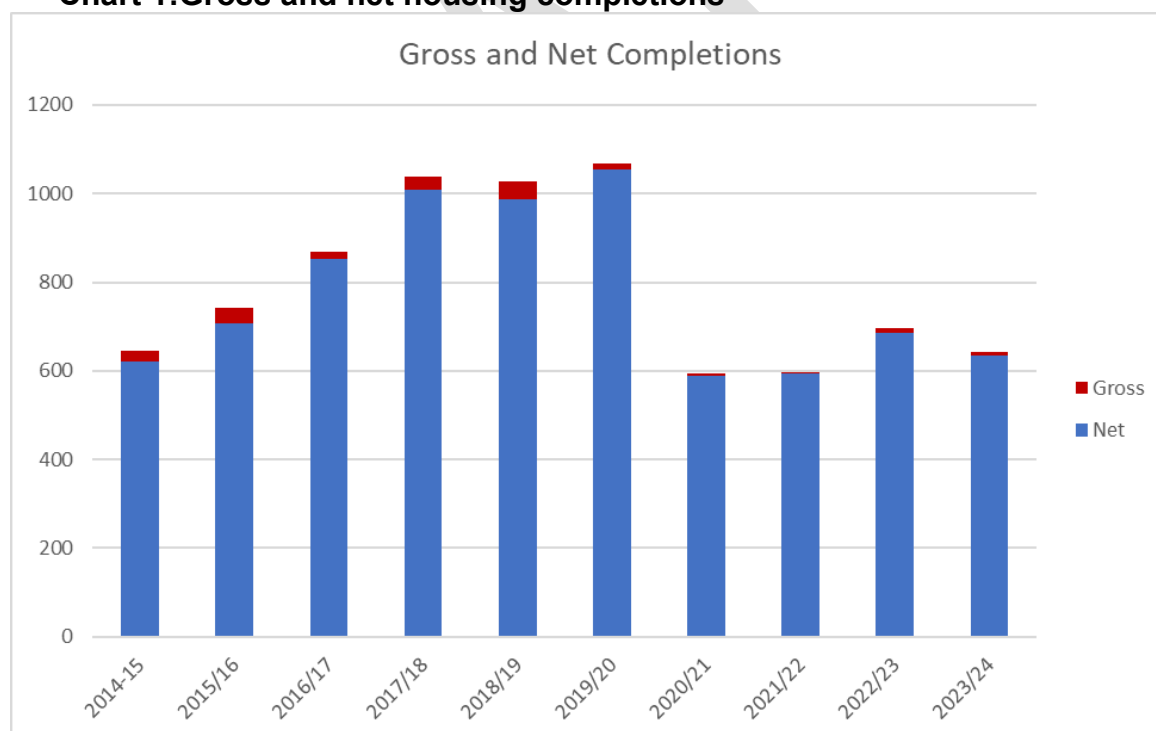
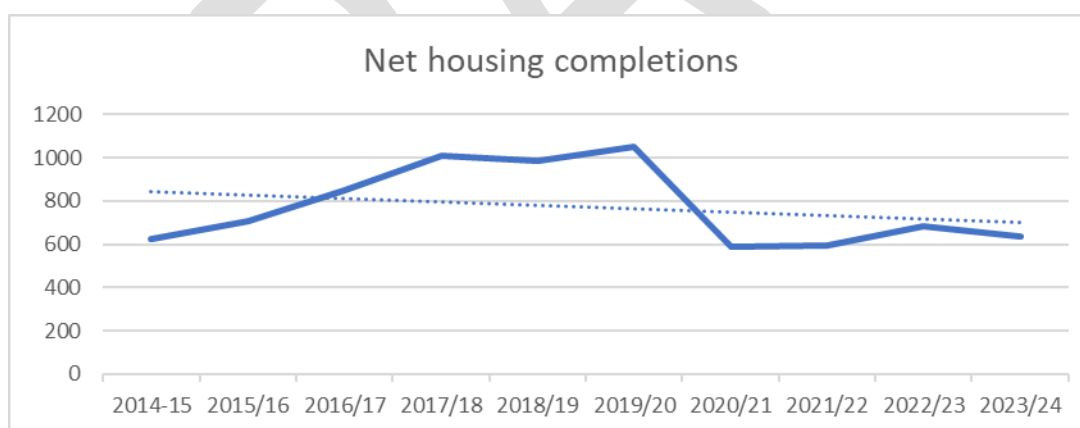


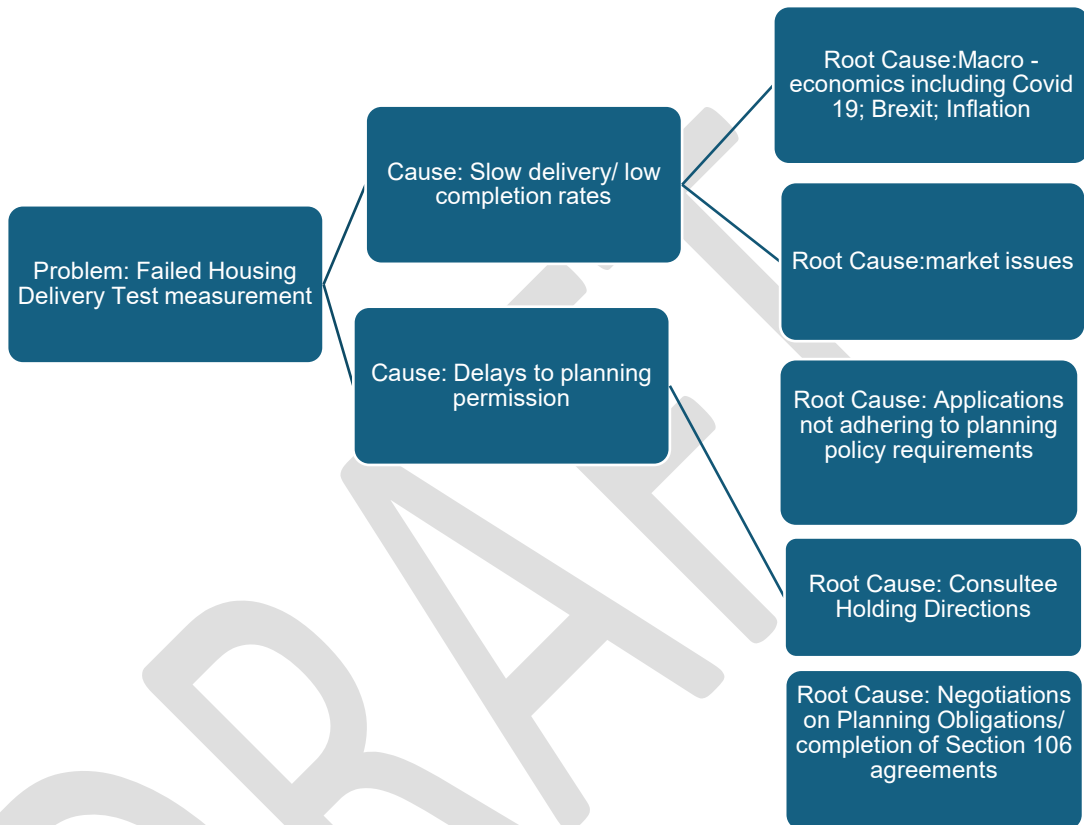
Chart 1 shows a general trend of increasing completions to the reporting year 2019/20, the year in which the Local plan was adopted, which was the highest of the plan period to date. It is clear from the chart that the impact of the COVID-19 pandemic and subsequent cost of living crisis has been significant. The net housing completions for the financial years 2020/21 and 2021/22, at just 588 and 594 dwellings respectively, were the lowest figures in Barnsley this century and are almost 500 fewer net completions than in 2019/20. All are lower than the annual 1,134 dwelling target.

- 3.2 The impact of the COVID-19 pandemic on the construction sector should not be understated. This caused delays, disruptions, and increased costs for developers, contractors, and suppliers. The lockdown measures also affected the planning and approval processes.
- 3.3 The impact of the pandemic has been felt by authorities across the country, through a combination of factors including the end of the stamp duty holiday, increase cost of building materials, labour shortages and associated supplies issue affecting the construction industry. This was recognised by the Government and taken account of in their Housing Delivery Test calculations for the years 2020 and 2021.
- 3.4 There is uncertainty and volatility in the housing market. The market is influenced by various factors such as interest rates, inflation, income, employment, consumer confidence, and government policies. The Brexit transition period also created some challenges for the housing sector, especially in terms of labour supply, materials sourcing, and investment flows.
- 3.5 Chart 2 below shows the net housing completions data as a trendline. It shows that housing delivery has been fairly stable since the start of the plan period, with a slight decreasing trend, accounted for by the significant drop in delivery as the Covid pandemic hit.

Chart 2: Net housing completions



- 3.6 However, both charts show that there are signs of recovery with the number of net new housing completions having risen since the 2020/21 low, with a marked increase of 91 net additional dwellings in 2022/23.



- 4.1 **Macro-economics:** The national picture has changed since the adoption of the Local Plan in January 2019. Covid-19, Brexit and more latterly inflation resulting in higher interest rates have impacted on the housing market, resulting in a prolonged period of turbulence.
- 4.2 The COVID-19 pandemic impacted on the construction sector, causing delays, disruptions, and increased costs for developers, contractors, and suppliers. The lockdown measures also affected the planning and approval processes.
- 4.3 The cost of living crisis, increase in materials and hike in interest rates have had an impact on the housing market and delivery. High inflation and rising interest rates are adversely affecting confidence and limiting the amount people can borrow.

- 4.4 There is uncertainty and volatility of the housing market, which is influenced by various factors such as interest rates, inflation, income, employment, consumer confidence, and government policies. The Brexit transition period also created some challenges and opportunities for the housing sector, especially in terms of labour supply, materials sourcing, and investment flows.

4.5 **Statutory consultee holding directions**

Other factors have also impacted housing delivery including a National Highways Agency change in position. The publication of circular 1/22 is now being referred to by the Highways Agency who are placing greater emphasis on Local Council's consideration of the impact on Strategic road networks and the delivery of sustainable development. This resulted in a large number of holding directions being issued until developers carried out significant levels of transport modelling. This has had an impact of stalling many sites. These holding directions have now been removed. However, these led to significant delay in determining applications which has had a knock on effect for delivery.

4.6 **Non-conformity with Local Plan policies and Masterplan Frameworks**

The Council has adopted masterplan frameworks for some of the larger Local Plan allocations, or clusters of sites. In some cases, these masterplan frameworks have been developed in collaboration with developers, yet developers are seeking to depart from these masterplan frameworks resulting in further delay.

4.7 **Change of Government and Planning Reforms**

The lead up to the general election, given the pre election period immediately following the May Local and Mayoral elections, and the election itself just prior to the summer break, further impacted on the speed of decision-making on some key planning applications.

The current Government has recently released a revised NPPF with a focus on housing delivery. This proposes wide ranging changes to the planning system.

The Government has also released a White Paper on English Devolution which intends to legislate to enable countrywide coverage of strategic planning, with elected Mayors being responsible for the development and agreement of sub regional Spatial Development Strategies (SDS). Government's intention is to publish a white paper in Autumn 2024, followed by legislation in 2025/26.

Further details on issues such as National Development Management Policies and Local Plan regulations are also awaited.

Given the details that are still awaited, it is uncertain whether there will be delay in some applications being submitted until the implications of any further planning reforms are known.

4.8 Resources

Developers are seeking permission for other sites including Safeguarded Land sites, which are contrary to national and local policy. Defending these sites will create additional work. The Council has scarce resources which are having to be spent dealing with these enquiries and applications, and in some instances defending appeals. This is resource intensive and can be costly to local planning authorities, particularly if the tilted balance arising from NPPF paragraph 11d is applied, appeals are lost, and costs are awarded.

In addition changes to the NPPF regarding Green Belt/Grey Belt are expected to result in additional enquiries and speculative applications. A further review of the Green Belt will also need to be undertaken in light of these changes, if they are implemented.

4.9 GDPR & Confidentiality

Confidentiality of information is a key challenge. The Council keeps preapplication discussions confidential and therefore the need for information to be published in the action plan conflicts with this. In addition, the General Data Protection Regulation (GDPR) may have implications for the publishing of data for the action plan, such as applicants' details for individual planning applications.

5.0 Issues not considered to be affecting delivery

5.1 Speed of determining planning applications

On balance the planning application process is running as it should. Issues with delays in determining applications have arisen on the large and complex masterplan framework sites. There have been delays in these applications being submitted and once submitted there has been gaps in information provided, and proposals have not been policy compliant. This has been disappointing given the resources that have been expended to produce the masterplan frameworks. Some of these have been developed with and/or led by landowners, agents and developers.

Where pre-application advice has been sought, some applications are submitted that do not fully adhere to the advice given.

5.2 Decisions on planning applications

In order to ensure that the Council achieves the best possible outcome for Barnsley, it is right that the line is held on planning applications that are contrary to national and local policy, and that do not conform with Masterplan Frameworks and other guidance that has been produced to ensure sites deliver development that meets the needs of local communities and provides necessary infrastructure. There has been a step change since 2019 in terms of ensuring the quality of design. Whilst the latest NPPF consultation

proposes to remove the term 'beautiful' which is subjective, it is still clear that the intention is to retain the emphasis on well designed schemes.

5.3 Land allocated for housing

Having a Local Plan adopted in 2019, that was reviewed in 2022 and considered to be fit for purpose, indicates that the issues are not caused by a lack of appropriate land allocations.

5.4 Burdens from planning obligations

Updated viability was undertaken in March 2024 to review the section 106 contributions sought through Supplementary Planning Documents, particularly in light of mandatory requirements such as Biodiversity Net Gain. The viability work carried out sensitivity testing which found that the increased SPD requirements do not render schemes unviable.

The report concludes:

"4.4. In short, the majority of the sensitivity tests undertaken do not undermine scheme viability. It is also stressed that even if the S106 contributions are increased to £13,000 per dwelling this does not significantly change the viability outcome (although it undoubtedly reduces the 'headroom' for a scheme to be viable).

4.5. In summary, the majority of the sites tested, even through sensitivity testing, are shown to be viable with the revised SPD policy requirements (and the subsequent increase in costs).

4.6. Based on the testing undertaken, the results therefore suggest that the proposed SPD policy requirements would not be sufficient alone to undermine viability. Instead, other factors such as density, build costs and sales value are more likely to have a significant bearing on the viability outcomes should there vary significantly from what has been assumed in the testing.

4.7. In conclusion, the proposed supplementary planning document requirements are not considered to undermine the viability of the Local Plan (albeit accepting that viability is still likely to be a consideration on a case by case basis reflecting the specific circumstances of a scheme)"

6.0 Extent to which issues are within BMBC control

6.1 Many of the issues are outside of the control of the Council. In particular, it has no control over the macro economics that impact on the housing market.

6.2 The Council has adopted a Housing Strategy which highlights that housing is a priority for the borough. The strategy sets out the measures it intends to implement in relation to the four pillars of the strategy which are:

1. Maximising existing stock
2. Supporting strong and resilient communities
3. Supporting people to live healthy and independent lives
4. Enabling sustainable housing growth to meet need

7.0 **Key Actions and Responses**

Table 1 below sets out key corrective actions that are planned or in progress. The table sets out who is responsible, indicates where progress has been made and indicative timescales.

8.0 **Project management and monitoring arrangements**

- 8.1 The principles of Plan – do – check - act will be used to monitor the position. Table 1 below sets out who is responsible for the actions and how they will be monitored.



Table 1: Proposed Corrective Actions

| Actions | How implemented | Responsibility | Timescale | In progress? | How monitored |
|---|---|-----------------------------|-----------|---|--|
| Speed up the signing of S106 Agreements | Review the process with Legal Services and developers. Identify reasons for delay once resolution to grant permission has been made, use of standard template where appropriate and milestones set out as part of the planning application process including the signing of S106 Agreements. Work with applicants to speed up the signing of section 106 agreements at their end. | Planning and Legal Services | ASAP | Standard templates are being used where appropriate. | To be monitored by Planning DM/ Support team |
| Consider use of shortened commencement condition of major housing development applications. | Attachment of planning condition to housing schemes | Planning and Legal Services | ASAP | | |
| Speed up the disposal of Council-owned land | Set out timescales for disposal. There are a number of Local Plan Housing allocations that are in whole or in part owned by BMBC. | Assets | ASAP | Discussions held between Assets and Housing teams. Asset Management strategy underway | |
| Speed up the delivery of in-house development taking into account viability. | Review programme of housing delivered directly by the Council. Allocate more resources to in-house delivery. The Housing | Housing team. | | Relaxations around spending RTB receipts is on | |

| Actions | How implemented | Responsibility | Timescale | In progress? | How monitored |
|--|---|-------------------|-----------|--|---------------|
| | Development Strategy and Delivery Programme has reviewed this. | | | acquisitions therefore current priority is acquisitions so a resource issue. A New Build and Acquisitions report was approved on 24 th July 2024 https://barnsley.ymbc.moderngov.co.uk/documents/s118721/Report.pdf | |
| Increase promotion of Barnsley as a place to build. | Regular meetings with developers and the creation of a team championing new housing delivery (Housing Growth team). Work with Comms. Regional discussion with SYMCA/ Homes England through Strategic Place Partnership to promote Barnsley as a place to build. | | | | |
| Stimulate the supply of affordable new homes, and to provide a focus | Regular engagement with Registered Providers on our Framework to understand their | Housing/ Planning | | | |

| Actions | How implemented | Responsibility | Timescale | In progress? | How monitored |
|--|---|--------------------------|-----------|--------------|---------------|
| for future affordable housing delivery. | pipeline and aspirations for increasing their affordable stock in the borough. Explore whether Registered Providers have any appetite to deliver more bespoke accommodation e.g. LD & Autism to meet the needs of particular service areas | | | | |
| Identify options for redundant housing stock and existing or proposed development requirements | <p>Berneslai Homes have a voids programme to bring BH stock back into use asap.</p> <p>Safer Neighbourhoods team are very proactive in terms of bringing empty private sector homes back into use.</p> <p>Assets are responsible for 'other' underutilised assets e.g. disposal at auction etc.</p> | Berneslai Homes / Assets | | | |
| Increase publicity and a point of contact for SMEs looking to develop in the Borough. | Publicise a point of contact within the Council as a coordinator for SME developers with input from Planning and Asset functions to provide advice and guidance along with the digital tool, development frameworks, brownfield land register and PIPs. Improvement | Planning/Assets | | | |

| Actions | How implemented | Responsibility | Timescale | In progress? | How monitored |
|--|---|----------------|-----------|---|---|
| | <p>of the website to address this issue.</p> <p>Opportunity to work with Procurement to develop a framework of SME's to help us deliver affordable homes.</p> <p>Potential for better engagement re asset disposals/LP opportunities.</p> | | | | |
| Small sites/ custom self build | <p>A policy will be included in the Local Plan review.</p> <p>SPD is being considered.</p> <p>Workshop with Right to Build Taskforce, with a follow up offer of further support.</p> | Planning | | Workshop held May 2024. Further support to be considered. | Number of custom/ self build sites/units are monitored annually for Government return |
| Review site viability to determine the funding gap | <p>Outcomes to be considered against funding opportunities.</p> <p>Strategic Housing can help link developers/house builders in with SYMCA/Homes England to see whether there are any viability solutions e.g. loan/grant</p> | Planning | | Some viability work undertaken in March 2024 to support SPD production. | |

| Actions | How implemented | Responsibility | Timescale | In progress? | How monitored |
|--|--|----------------------|-----------------------|--|---------------|
| Developer forums/ Agents forums | <p>Hold regular developer forums to build relationships with developers and understand the challenges of sites.</p> <p>These need to be topical. House builders unlikely to divulge any site specific issues/constraints in a public forum. Messaging that the Council is open for business.</p> | Housing/ Planning | | <p>Housing team organised forum July 2024</p> <p>Planning to hold Agents forum in September 2024</p> | |
| Delivery rates | <p>Work with developers to understand delivery rates and what can be done to increase them.</p> <p>Related to work with Homes England on Housing Pipeline and work on stalled sites.</p> | | | | |
| SHMA – Strategic Housing Market Assessment | The SHMA considers the need for affordable housing and the size, type and tenure of housing need for specific groups within the borough. | | Latest SHMA June 2021 | Completed. May need to be updated to support future Local Plan review. | |
| Housing Strategy | <p>The Council has adopted a Housing Strategy 2024-2028</p> <p>https://www.barnsley.gov.uk/media/gxqo1mvn/bmbc-housing-strategy-2024-2028.pdf</p> | Planning/ Housing | | | |

| Actions | How implemented | Responsibility | Timescale | In progress? | How monitored |
|---------------------------------|---|-----------------|-----------|--------------|---------------|
| | <p>The Council's Housing Strategy (2024-2028) confirms that housebuilding remains one of the Council's key objectives. Work is underway to unlock a range of Local Plan sites to accelerate housing delivery across the borough, and to move live planning applications to determination. In addition, the Council's New Build and Acquisitions Strategy sets out an ambitious £43M programme to deliver 200 new affordable homes over the next five years. Officers are also exploring a range of alternative delivery mechanisms for Council-owned assets to maximise market and affordable housing delivery.</p> | | | | |
| BMBC new build and acquisitions | <p>BMBC new build and acquisitions programme. Quote from press release re Housing Revenue Account Budget 19/1/2024 "We have also allocated significant funding to develop 200 new homes over the next five years through our</p> | Housing/ Assets | | | |

| Actions | How implemented | Responsibility | Timescale | In progress? | How monitored |
|---|--|--|-----------|---|---------------|
| | New Build and Acquisition programme." (From https://www.barnsley.gov.uk/news/cabinet-will-consider-the-housing-revenue-account-budget-for-202425/ >) | | | | |
| Housing Pipeline project with Homes England | Homes England and the South Yorkshire Mayoral Combined Authority (SYMCA) have committed to entering into a Strategic Place Partnership, designed to support sub-regions with the most ambitious proposals for housing growth. As part of this Partnership, the Council are part of a 'Housing Pipeline Project' led by Cushman and Wakefield in part to enable an increase of housing delivery across the sub-region, including accelerating housing delivery on Local Plan and Masterplan Framework sites in Barnsley. The Carlton Masterplan Framework sites MU2 and MU3 have been identified as 'amber - challenging but deliverable sites' which alongside MU5 at Royston constitute a catalyst site with an | Housing Team led with Assets and Planning input. | | Initial work completed. Ongoing. | |

| Actions | How implemented | Responsibility | Timescale | In progress? | How monitored |
|----------------------------|--|----------------|-----------|--|-----------------|
| | additional funding commitment from SYMCA and Homes England to accelerate delivery strategies this year. Prioritisation of internal resources will allow the coordination of steering groups and drive forward pre-apps/planning applications in the short-term. | | | | |
| Local Validation checklist | <p>Ensure Local Validation Checklist is clear and up to date to ensure good quality planning applications are submitted with all the relevant information.</p> <p>Ensure viability is considered prior to submission. Add to validation checklist. Where applicants are claiming viability issues recommend they do a full costing of publicised contributions/contributions advised at pre-application stage. Consider adding to validation checklist a statement requiring that this has been undertaken. If applicants consider the scheme unviable then a viability assessment should be submitted</p> | Planning DM | | Validation checklist updated early 2024. | Review annually |

| Actions | How implemented | Responsibility | Timescale | In progress? | How monitored |
|---------|---|----------------|-----------|--------------|---------------|
| | <p>with the application together with agreement to pay for independent review at the validation stage. The review could then be done early in the process to avoid delay.</p> <p>Improve quality of submissions, and ensure timely submission of additional/ amended information. Exploration of training for applicants on requirements or a clear statement from LPA of requirements and expectations.</p> <ul style="list-style-type: none"> • Set clear timescales with applicants for the submission of additional/amended information both at the validation stage and subsequently, throughout the validation process. • Training for volume housebuilders • Statement of requirements/ expectations from LPA | | | | |

| Actions | How implemented | Responsibility | Timescale | In progress? | How monitored |
|---|--|------------------------------|-----------|----------------------------------|------------------|
| Brownfield Land Register | Brownfield Land Register has been published, | Planning Policy | | Done | Updated annually |
| Publish the Digital Brownfield Tool providing site information. | Consider making the Tool available on the Council's website to help to support SMEs to take on more sites and implement more existing permissions. | Planning | | | |
| Stalled sites survey | Links with housing pipeline Numerous enquiries/conversations with agents re stalled sites. Setting up shared database between Policy, DM, Strategic Housing, Assets etc to ensure Council is aware of latest position/ latest conversations | Planning/ Housing/ Assets | | | |
| Housing allocation site status | Set up a table to share with Housing and Assets so all can update and information is kept in one location. | Planning Policy | ASAP | First draft done and circulated. | |
| Transport modelling | Extensive transport modelling has been done to support development proposals and overcome National Highways holding directions. This has been carried out by developers | BU6 | | | |

| Actions | How implemented | Responsibility | Timescale | In progress? | How monitored |
|--|--|----------------------|-----------|--------------|---------------|
| | working collaboratively and in consultation with the Council as local planning authority and highway authority. | | | | |
| Vacant properties / Empty homes? | The Council's Housing Strategy 2024- 2028 aims to reduce the number of empty homes. | Housing | | | |
| Improve quality of submissions, and ensure timely submission of additional/ amended information. Could include training for applicants on requirements or a clear statement from LPA of requirements and expectations. | <ul style="list-style-type: none"> Set clear timescales with applicants for the submission of additional/amended information both at the validation stage and subsequently, throughout the validation process. Training for volume housebuilders Statement of requirements/ expectations from LPA | Planning/ Developers | | | |
| Minimise number of pre-commencement conditions | Post permission, delays can be caused by discharging conditions, for the same reason as applications (inadequate submissions and lack of specialist consultees). Where possible it would be beneficial to | Planning/ Developers | | | |

| Actions | How implemented | Responsibility | Timescale | In progress? | How monitored |
|---------------------------------|--|-------------------------|-----------|--------------|---------------|
| | keep pre-commencement conditions to a minimum | | | | |
| Minimise incremental amendments | Possible training or statement of expectations for volume housebuilders where the need for comprehensive amendments in one go is explained. In order to achieve this, work to take place to receive all consultee responses within the 21 day statutory period to enable a comprehensive request for amendments to be issued early in the application cycle. | Planning/ Developers | | | |
| Showstoppers | Ensure everyone is sighted on showstoppers and they are tackled head on e.g. power/ network capacity etc | | | | |

Appendix 1

Extract from table 122 housing supply net additional dwellings by LA district England

| Authority | 2009/ 10 | 2010/ 11 | 2011/ 12 | 2012/ 13 | 2013/ 14 | 2014/ 15 | 2015/ 16 | 2016/ 17 | 2017/ 18 | 2018/ 19 | 2019/ 20 | 2020/ 21 | 2021/ 22 | 2022/ 23 |
|-----------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|
| Barnsley | 563 | 1012 | 886 | 717 | 809 | 680 | 766 | 910 | 1069 | 1048 | 1112 | 650 | 595 | 681 |
| Doncaster | 506 | 817 | 522 | 381 | 719 | 857 | 1227 | 1114 | 1273 | 1392 | 1278 | 826 | 1190 | 1295 |
| Rotherham | 394 | 543 | 787 | 694 | 738 | 818 | 770 | 790 | 657 | 607 | 741 | 751 | 1090 | 745 |
| Sheffield | 1681 | 685 | -378 | -50 | 106 | 954 | 778 | 1437 | 1493 | 1165 | 2272 | 1039 | 1774 | 1667 |