

Appendix 5 – Options for additional housing provision

Introduction

1. In light of the Inspector's interim findings and the work we have carried out in relation to the jobs target and the objectively assessed need we have begun to consider the options available for providing any additional housing that may be required to meet our objectively assessed need in full. This work, which is being carried out alongside the work to establish options for providing additional housing within the villages, will also be important once we receive the Inspector's findings following stage 3 of the examination. As a result of work carried out in preparation for and during the Stage 3 hearings we have already identified the some sites may now not deliver in full during the plan period and that the capacity of others will reduce as a result of constraints that we not previously accounted for.
2. In light of the above it is necessary to explore the options available for identifying additional housing allocations should the need arise. This note therefore set out three possible options that we are considering. These are as follows:
 - a) Allocate housing sites that are currently shown as safeguarded land and look to identify new areas of safeguarded land.
 - b) Increase our assumption on the amount of units delivered on windfall sites throughout the plan period and find additional safeguarded land.
 - c) Revisit rejected sites to see whether constraints can be overcome.
 - d) Allocate sites known to the authority and promoted by developers that are within strongly performing general areas of Green Belt but which aren't themselves performing a strong Green belt function.
3. This report therefore sets out the rationale for and merits of each of these approaches.

Options

- a) *Allocate housing sites that are currently shown as safeguarded land and look to identify new areas of safeguarded land.*
4. This option would involve simply allocating areas of land currently shown as safeguarded land but which we consider capable of being delivered for residential development either in full or in part during the plan period. The sites themselves would firstly have to be located in areas of growth to ensure that we retain our settlement hierarchy.

They would then have to be considered suitable, achievable and available for housing development when assessed against our housing site selection methodology. This would also involve an assessment to ensure that there were no overriding constraints and we would then consider cumulative impacts including the potential for them to adversely affect deliverability of nearby sites due to the likely competition.

5. The advantage of this approach is that the areas of land identified have already been assessed as suitable for release from the Green Belt to meet longer term development needs. Accordingly, it is logical to explore opportunities arising from these areas of land first, which is the approach we are taking to identify additional sites in the villages.
6. This disadvantage of this approach is that the areas of safeguarded land around Urban Barnsley and the Principal Towns tend to be large in scale so where they are located around settlements already earmarked for substantial housing growth it is debatable as to what extent they could deliver in their entirety during the plan period. Where there is known developer interest the prospects inevitably increase but we need to consider any knock on implications on delivery of existing allocations.
7. Should we be able to identify such sites, it is almost certain we would have to identify new safeguarded land to replace the land being allocated and anticipated to deliver during the plan period. The starting point for this process would be to look at the resultant parcels identified in the Green Belt Review. There would again be logical because these areas of land are also not considered to be performing a strong Green Belt function. The only potential issue with this approach is that these resultant parcels are not distributed evenly between the identified growth settlements and so it may not be possible to sustain our spatial strategy in the years immediately following the end of the plan period.
- b) Increase our assumption on the amount of units delivered on windfall sites throughout the plan period and find additional safeguarded land.*
8. When we calculated how much safeguarded land would be required in order to ensure that Green Belt boundaries would endure beyond the plan period, we based this on providing a 5 year supply of housing based on the requirement to provide 1,100 homes a year. However, rather than providing the amount of land required to meet the requirement for 5,500 homes, we considered it sensible to firstly account for any windfall sites that would be likely to come forward during the plan period over and above those already accounted for.
9. In respect of windfall sites we made an allowance for the first 5 years of the plan period amounting to 476 homes, which amounts to just over 2% of our overall requirement. We used the first five years only based on previous planning guidance but more recent guidance does suggest

that a greater allowance can be included in Local Plans if it is supported by clear evidence. In the case of Barnsley, we have consistently delivered windfall sites in the past. This explains why there is so little previously developed land currently available, which has led to the need to review the Green Belt boundaries.

10. Until around 2008/09 Barnsley experienced significant housing development on sites previously used for employment purposes. This is set out on page 14 of our Annual Monitoring Report 2016. Since then the amount of employment land developed for residential purposes has declined significantly as a result of the Council taking a firm line on such proposals in order to protect the supply of employment land so that it is available to accommodate employment floorspace. However, once there is an adequate supply of employment land or premises in the locality as a result of the allocations in this plan and their associated development for employment purposes, it is probable that we will begin to support residential applications on suitable vacant employment sites that cannot satisfactorily support continued employment use. This is supported by the inclusion of a 95 hectare replacement allowance in our employment land calculations a good proportion of which could be suitable for residential purposes.
 11. In light of the above and historic evidence on other sources of windfall sites, it is considered that there is strong evidence to support our existing approach of factoring in a windfall assumption when establishing how much safeguarded land is required. However, we have refrained from bringing this allowance forward to form a component of our housing requirement as we consider that our current approach provides much needed flexibility should the identified housing allocations not come forward as anticipated and the approach does not result in additional Green Belt release by virtue of the windfall allowance being accounted for in the safeguarded land calculations. Nonetheless, there is potential scope to include a higher windfall figure within the plan if required and certainly we would expect a small allowance to be directed towards the villages to reflect historic trends and our rural exceptions policy.
 12. If we were to pursue this option we would need to identify new safeguarded land to ensure that Green Belt boundaries could endure beyond the plan period. This again leaves us with a challenge of ensuring there is a relatively equitable distribution of safeguarded land across the various settlements earmarked for growth.
- c) *Revisit rejected sites to see whether constraints can be overcome.*
13. This option is to revisit the rejected sites and see if they offer any potential. To some extent this is covered by the first option already as safeguarded sites were rejected as housing allocations. However, there are other sites that were rejected where new information may have come to light since the decision was made to reject them. Some

of these could have been raised in the stage 3 hearing sessions and it is possible that the Inspector may have a different view on their suitability, availability and achievability. As these sites have already been assessed it will be relatively straightforward to revisit the specific issues that resulted in the site being rejected.

14. In the majority of cases there will be no prospect of the constraint being overcome but there will inevitably be some sites that were rejected where the decision was finely balanced. If the context has changed and more sites are needed it is therefore logical to examine this possible source of supply.

d) *Allocate sites known to the authority and promoted by developers that are within strongly performing general areas of Green Belt but which aren't themselves performing a strong Green belt function/purpose.*

15. Since we embarked on the Local Plan process in 2014 a number of developers/landowners and their representatives have been promoting sites that we have consistently resisted because they fall within strongly performing general areas of Green Belt. Their argument has been that although the larger general area that their site is located within is performing a strong Green Belt function, their site alone is not. In light of the Inspector's findings that we may need to increase our objectively assessed housing need and that we have accepted that some site won't deliver to the extent originally anticipated, this position is certain to continue during the remainder of the examination. This is despite the fact that the inspector has made no criticisms of the Green Belt Review and the approach we've taken thereafter in her interim findings.

16. Our concern about adopting this type of approach is the danger that it would unravel our Green Belt Review methodology and our strategic objective of protecting the most important general areas of Green Belt and this is reinforced by the lack of criticism to date from the Inspector. On this basis, we consider that the scope of the exercise should be limited to a small number of sites around Urban Barnsley and the Principal Towns that we are already aware of and initially excluded at previous stages.

17. The main advantage of this particular option is the fact that where there is known developer interest we can be confident that sites will be delivered early in the plan period, which is important if we are to preserve a 5 year housing land supply. By definition, this decreases the extent to which we would have to allocate safeguarded land for residential purposes when the plan is first reviewed. Being willing to consider a small number of these sites will also potentially allow us to allocate sites in areas where there are few potentially competing sites further improving the prospects for delivery. It could also facilitate allocation of particularly sustainable sites that were only rejected because they were within a strongly performing general area of Green

Belt despite not themselves not performing a strong Green Belt function/purpose and having no overriding constraint that would prevent them coming forward. Such an approach would inevitably be criticised by those who are promoting sites that are currently safeguarded and/or are located within a Green Belt resultant parcel which we chose not to allocate. However, much of this potential source of supply has already been rejected for housing either because of an overriding constraint or because we felt there was already sufficient land allocated within a specific area that would promote a more sustainable pattern of development. It would therefore be difficult to justify resisting a new source of supply from a limited number of sites that despite being located within a strongly performing general area of Green Belt would promote a more sustainable pattern of development without causing demonstrable harm to the Green Belt and our overall strategic approach of seeking to protect the stronger performing general areas.

18. In light of the above, we do consider that this source of supply should be explored but it would be our intention to only pursue this option around Urban Barnsley and the Principal Towns in a handful of instances. Similarly, as indicated in paragraph 7.5 of the main cabinet report, this approach is unlikely to be considered around the villages unless there are obvious opportunities for infill to create a more defensible boundary and a site performs relatively strongly when assessed against the site selection methodology.

Recommendation

19. Having assessed these options it appears that they all have their merits but they also have disadvantages. They each therefore have the potential to contribute towards meeting objectively assessed housing need but this will largely depend on the circumstances. We are therefore proposing to explore each of these options but the scope of option 4 will be limited in scale to a handful of sites which we consider to have very specific characteristics that warrant their allocation.