

16th September 2015

Dear Sirs,

LAND AT HUNNINGLEY LANE, WORSBOROUGH DALE – BARNSELY - INDEPENDENT SUSTAINABILITY & DELIVERABILITY ASSESSMENT

Further to your recent instructions, we write to provide you with an independent assessment of the sustainability and deliverability credentials of the Hunningley Lane, Worsborough Dale site when considered against the relevant policies set out within the National Planning Policy Framework (NPPF). We confirm that we have not had any previous involvement with the promotion of this site and that an initial site visit was undertaken on 10 September 2015.

PB Planning has over 12 years' experience in securing planning consent for residential development. PB Planning is headed up by Paul Butler, a chartered Town Planner, who has spent the last 5 years working as the Head of Planning in the Yorkshire Region for a national house builder, gaining a critical knowledge of the deliverability of residential development sites. In this period he successfully obtained planning permission for over 3,000 homes across the Region on a diverse range of sites. Prior to this role Paul's experience included working for the national town planning consultancy's Nathaniel Lichfield & Partners (NLP) and Barton Willmore.

Our assessment has considered the evidence which has previously been submitted to Barnsley Metropolitan Borough Council (BMBC) in respect of the site's suitability for residential development. Evidence contained within the reports prepared by Peter Brett Associates (PBA) dated January 2015; Spawforths dated April 2014; and Smeeden Foreman's Landscape Statement dated May 2014 and their subsequent Letter dated 9th January 2015. The site location plan and indicative residential layout which are included within the PBA report are enclosed separately with this letter for ease of review.

We have reviewed the content of these documents against existing national planning policy guidance, the Barnsley Core Strategy, the policies contained within the emerging Barnsley Local Plan and the evidence base which underpins it.

SUSTAINABILITY ASSESSMENT

The Framework is clear in Paragraph 6 that the purpose of the planning system is to contribute to the achievement of sustainable development. In Paragraph 7 it identifies three dimensions to sustainable development, which are as follows:-

- ***An economic role*** – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;
- ***A social role*** – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being; and

- **An environmental role** – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.

The Framework identifies that these three roles should not be considered in isolation because they are mutually dependent. The document makes it clear that economic growth can secure higher social and environmental standards, and well-designed buildings and places can improve the lives of people and communities. The Framework states in Paragraph 8 that to achieve sustainable development:-

“economic, social and environmental gains should be sought jointly and simultaneously through the planning system. The planning system should play an active role in guiding development to sustainable solutions.”

Paragraph 9 of the Framework further identifies that sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment, as well as in people’s quality of life, which includes but is not limited to the following:

- *Making it easier for jobs to be created in cities, towns and villages;*
- *Moving from a net loss of bio-diversity to achieving net gains for nature;*
- *Replacing poor design with better design;*
- *Improving the conditions in which people live, work, travel and take leisure; and*
- *Widening the choice of high quality homes.*

The assessment below considers the merit of the site against each of the NPPF’s identified roles of Sustainable Development.

Economic & Social Role

BMBC have stated in a number of their strategies and policies that the Borough is trailing behind the Yorkshire & Humber and national averages in relation to a wide range of economic indicators. Which is leading to significant social imbalances.

In particular BMBC’s now adopted Economic Strategy entitled *“Growing Barnsley’s Economy (2012 – 2033)”* recognises that housing plays a key role in both stimulating and supporting economic growth. Importantly, the report acknowledges the need to deliver a step change in the quality and mix of housing available in the Borough. To ensure the delivery of these aspirations the Strategy recognises that BMBC will need to work in collaboration with the private sector to deliver a housing mix which meets the future requirements of the Borough.

BMBC’s adopted Economic Strategy identifies that if left to market forces the economic performance gap between Barnsley and the region is likely to widen thus placing the Borough in an even less favourable position for inward investment, indigenous business growth and generally providing local residents with lower levels of new economic opportunities.

In addition, the Barnsley Strategic Housing Market Assessment (SHMA) concludes that there is a short fall of all property types in the Borough, but specifically in detached family house types. It concludes that future development should focus on addressing identified shortfalls to reflect household aspirations by delivering a house type mix that should take account of the identified imbalances.

We believe that the proposed development of the Hunningley Lane site can provide an important contribution to increasing the breadth of housing in the Borough through the delivery of an appropriate mix of housing that can aid in the re-balancing of the Borough’s housing supply.

With specific regard to the economic role of sustainable development, the development of the site would deliver close to a £40 million pounds worth of construction investment to the local area and the wider Borough over a 10 year period. The level of investment envisaged would deliver a wide range of direct and indirect economic benefits to the area, stimulating employment growth during and post construction.

The development has the potential to deliver 120 new direct and indirect construction jobs over the 10 year build period. A large proportion of the workforce for housing developments are drawn locally. It is therefore highly likely that the majority of any future construction jobs will be taken up by the local workforce. Furthermore, local business will also benefit from trade linkages established through the construction of the development, meaning that a large proportion of the indirect jobs would be supported locally from suppliers of construction materials and equipment.

Following the construction of the residential development, new employment opportunities could be created and existing facilities/services sustained as a result of the spending patterns of new residents within the local area. It is estimated that the development could generate approximately £6 million pounds each year of spending power to the local retail and leisure economy.

The development could deliver significant economic gains through the Government's New Homes Bonus incentive of approximately £2.8 million pounds and annual Council Tax payments of approximately £480,000. At a time when local authorities budgets are being reduced these areas of financial gain can provide beneficial ways in which Councils can continue to support their communities.

The development will also provide the potential to deliver a significant financial contribution to the improvement of local infrastructure, including local educational facilities, sustainable transport schemes, green infrastructure, community sports facilities and healthcare facilities through Community Infrastructure Levy payments.

We understand that the revenue arising from the development of the site will enable further investment to be made at Cannon Hall Open Farm, your very successful local business which is a major tourist attraction, educational facility and which provides a large number of employment opportunities and plays a major role in the area's economy. Further investment into the business will aid in increasing its role in the local economy and this should be considered very seriously by BMBC when considering the benefits associated with the release of the Hunningley Lane site as a potential housing allocation.

On account of the above we believe that the development of the Hunningley Lane site will deliver significant economic benefits to both the local area and the wider Borough and will meet the Government's economic objectives of sustainable development.

Turning to the social role of sustainable development, we believe that the development of the Hunningley Lane site can contribute to supporting a strong, vibrant and healthy community by providing a supply of housing that is required to meet the needs of the present and future generations. Furthermore, the development can help to re-balance the Borough's housing supply through the delivery of a mix of house types, including detached family homes.

Paragraph 47 of the NPPF identifies that in order to boost significantly the supply of housing Local Planning Authorities are required to ensure that they meet in full their objectively assessed needs for housing and in doing so demonstrate annually a 5 year supply of deliverable housing sites. We set out in detail below how we consider the site to represent a deliverable housing site.

The development of the site will deliver high quality homes for local families within the identified Urban Barnsley area. Urban Barnsley is identified within current and emerging Local Planning Policy as the focus of new housing development on account of it being the most sustainable location for development in the Borough. With regards to the Hunningley Lane site, the site is located within walking and cycling distance of a range of leisure and community services. The development will help to sustain local services and facilities by providing new retail and leisure expenditure.

The enclosed indicative residential layout (prepared by Persimmon Homes) identifies that the site has the potential to deliver a high quality of design that will complement the character of the settlement, creating an attractive place to live. The layout, which was included within the letter prepared by Persimmon Homes dated 7th January 2015 and enclosed within the PBA report, identifies that following the undertaking of necessary technical work Persimmon Homes consider that the development of the site could deliver 329 dwellings including a mix of 2, 3 and 4 bed family homes. Importantly, 10% (33) of the proposed dwellings would also be provided for affordable housing in accordance with local planning policy. The amount, tenure, type and size of the proposed affordable housing can be negotiated with BMBC to ensure that the development fully meets BMBC's requirements. We therefore believe that the development of the site will therefore make an important contribution to meeting the market housing and affordable housing needs of the local area and the wider Borough.

The indicative residential layout enclosed with this letter delivers a density of 28 dwellings per hectare (gross) or 39 dwellings per hectare (net) once the proposed areas of open space are removed from the calculation. The identified net density levels therefore comply with the BMBC's density requirements for development within the Urban Barnsley area.

With regards to density we agree with the point made in the PBA report that there will be a need to release additional housing sites to those already proposed within the draft Barnsley Local Plan. We have identified above that the Hunningley Lane site can deliver a high quality development which would meet identified housing needs and deliver an appropriate level of open space, resulting in a gross density level of 28dph. This equates to a net density of 39dph when the areas of open space are removed from the calculation. However, as there are no physical constraints associated with the development of the site (such as topography, easements or pylons), it could easily be foreseen that this position would not be the same on a number of the other proposed allocations and thus they wouldn't be able to deliver BMBC's identified quantum of homes for this reason. Notwithstanding of course whether they can all be considered to be deliverable or not.

Linked to the above point is also the matter of the delivery of the right type of homes in the right market locations. BMBC's Economic Strategy and Housing Strategy identify the need for the delivery of a number of detached family homes in the Borough to help to re-balance the Borough's economy through the retention of high skilled workers. We agree with the PBA report that the currently proposed densities would not enable the delivery of the level of low-density executive homes required to meet BMBC's identified needs and thus once this matter is taken fully into consideration as part of the emerging Barnsley Local Plan it is likely that the proposed quantum of a number of the identified draft housing allocations will reduce and accordingly additional land will need to be released from the Green Belt in order to meet the identified housing needs of the Borough.

On account of the above we believe that the development of the Hunningley Lane site in the manner proposed would meet the Government's social objectives of sustainable development.

Environmental Role

The Framework identifies the environmental role of sustainable development as contributing to protecting and enhancing our natural, built and historic environment.

It is clear from our review of the previously submitted documentation that the Hunningley Lane site will meet the environmental role of sustainable development prescribed in the NPPF.

In respect of the site being situated in a sustainable location, the Barnsley Core Strategy identifies that the site is located in Urban Barnsley, a location which is *"expected to accommodate significantly more growth than any individual Principal Town to accord with its place in the settlement hierarchy"*.

Linked to the above point is the site's immediate sustainable location close to public transport facilities on Hunningley Lane as well as being located in walking and cycling distance from a range of shops, services and community facilities including Hunningley Primary School and Barnsley Academy (located across the road to the west of the site). The site's location, particularly in respect of local schools, is a huge benefit when considered against other identified potential housing allocations in that it will ensure that the use of the private car will be minimised and the use of sustainable transport modes such as public transport, cycling and walking will be maximised.

We concur that the main environmental consideration associated with the site's development is its current location within the designated Barnsley Green Belt. However, it is also our professional opinion that the site does not fulfil any of the five Green Belt purposes identified within Paragraph 80 of the NPPF.

It is unequivocal that the development of the Hunningley Lane site would represent a logical rounding-off of Urban Barnsley, with it being located immediately adjacent to existing housing and with strong, permanent, defensible boundaries. We agree with the statement made in the previously submitted material that the site's release would not constitute a significant incursion into the Green Belt as demonstrated in the plans submitted within the Smeeden Foreman Landscape Statement.

From our review of the plans we concur that the proposed area of housing would only extend a modest distance beyond the existing residential area at the eastern end of Worsborough Dale, and that any further encroachment into the Green Belt beyond would not be possible due to the presence of the railway line to the east and White Cross Lane to the south, which would form strong, permanent physical boundaries.

We also acknowledge and agree with Smeeden Foreman's opinion that the development of the site could have a wider benefit to the Green Belt of redefining the existing urban edge through a sensitively designed scheme. The redevelopment of the site would provide a long term permanent boundary to the Barnsley Green Belt in this location.

Following a review of the previously submitted documentation and BMBC's evidence base documents which underpin the emerging Barnsley Local Plan we believe that the Hunningley Lane site does not fulfil any of the five Green Belt purposes identified in Paragraph 80 of the NPPF for the following reasons:-

1. The development of the site would clearly not lead to unrestricted sprawl of the built-up area due to the site measuring only 12.5Ha, which equates to only 7% of an identified localised Green Belt parcel of 187.3Ha and only 0.05% of the total wider Barnsley Green Belt area of 25,000Ha;
2. The development of the site would not lead to coalescence of any settlements as a strategic gap would be maintained and strengthened through the appropriate rounding off of the settlement form of the area;
3. The development of the site would not lead to any significant encroachment into the countryside beyond permanent defensible boundaries through the creation of a new, strong, permanent physical Green Belt boundary in the form of the existing railway line and White Cross Lane;
4. The development of the site would not harm the setting and character of an historic town; and
5. There would also be no adverse effect in relation to urban regeneration given the site's location within the identified growth area of Urban Barnsley.

Finally, we concur with the comments made in the PBA report and Smeeden Foreman Letter contained within it (dated 9th January 2015) that the land area parcels assessed within the ARUP Green Belt Review are too large and do not therefore provide appropriate conclusions in respect of specific, smaller, parcels of land such as the Hunningley Lane site. We again agree with the PBA report where it is stated that if the ARUP Green Belt Review had considered the Hunningley Lane site on its own

merits then the outcomes would have been different and more positive in respect of supporting the release of the land from the Green Belt.

In respect of other potential environmental matters, we have undertaken our own assessment of the area and confirm that the position stated in the previously submitted Spawforths Advocacy Document is correct in that there are:-

- No identifiable highways constraints;
- No potential drainage constraints that could not be overcome through modern, standard, drainage techniques;
- No identifiable areas of ecological or arboricultural value that would could not be appropriately mitigated;
- No anticipated constraints regarding ground conditions, geology or mining;
- No issues in respect of flood risk as the site is mostly located in Flood Risk Zone 1;
- No adjacent land uses that would adversely impact on the amenity of any future residential development of the site;
- No issues in respect of Air Quality;
- No issues with regard to the loss of high value agricultural land.

The evidence provided in the previously submitted documentation provides clear evidence that the development of the Hunningley Lane site would comply with the environmental role of sustainable development as prescribed by the Framework.

On account of the above we believe that the potential development of the Hunningley Lane site would ensure the protection of the area's natural and built environment through the delivery of a sympathetically designed scheme situated in a sustainable location.

Sustainability Assessment Conclusion

The Framework is clear that the purpose of the planning system is to contribute to the achievement of sustainable development.

Our review has established that the development of the site for residential use could make a positive contribution towards achieving the three mutually dependent dimensions of sustainable development. It has identified the following:-

- **An economic role** – *the development proposals will deliver economic investment through the delivery of a suitable mix of new homes that will provide new employment opportunities, increased spending in local facilities and substantial financial contributions towards improvements such as education and local infrastructure.*
- **A social role** – *the development proposals will support strong, vibrant and healthy communities, which will help to re-balance the Borough's housing supply by contributing to the identified housing needs of the area through the delivery a high quality residential development which can meet the needs of first time buyers, families and those in affordable housing need.*
- **An environmental role** – *the development proposals will contribute to protecting and enhancing the natural, built and historic environment of the area through the delivery of a sympathetically designed scheme situated in a sustainable location which can provide long term permanence to the Green Belt.*

In conclusion it is our professional view that the development of the Land at Hunningley Lane, Worsborough Dale would fully accord with the economic, social and environmental dimensions of sustainable development, as prescribed by the NPPF. Overall there are no adverse environmental

impacts that would significantly and demonstrably outweigh the identified benefits of the proposed development.

DELIVERABILITY ASSESSMENT

As the site is being promoted as a potential residential development allocation a further planning policy test of the NPPF to consider the site's credential against is "deliverability".

Paragraphs 47 and 159 of the National Planning Policy Framework (NPPF) provide clear guidance that in order to boost significantly the supply of housing land local planning authorities should in their Local Plans identify specific *deliverable* sites that can provide 5 years' worth of housing land and *developable* housing sites for the period beyond this. A local planning authority's housing land allocations should therefore be capable of delivering sufficient housing over 5 and at least 15 year periods, unless they believe this period should be extended. One such reason for extension to this period is to ensure long term permanence to the Green Belt.

Footnotes 11 and 12 of paragraph 47 of the NPPF provide the definition of "*deliverable*" and "*developable*" residential development sites.

Footnote 11 identifies that "*to be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a real prospect that housing will be delivered on the site within five years, and in particular that development of the site is viable.*" Footnote 12 states that "*to be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged.*"

The NPPF is clear that sites considered to be *deliverable* are considered to represent better planning prospects than those identified as *developable*, and consequently they should take preference in the identification/allocation of housing land.

In accordance with Footnote 11 of Paragraph 47 of the National Planning Policy Framework, we have therefore assessed the deliverability of the site in respect of whether it is available now, is a suitable location for development now, and whether a viable housing development could be achievable within the next five years. Our conclusions are as follows:-

Suitability

We believe that the site is located in a suitable location for residential development now. As identified above, a sustainable development can be delivered at the site with pedestrian and cycle access to existing services, facilities and public transport. A suitable vehicular access can be provided to the site. In addition, the technical assessments included within the Spawforths Advocacy Document provide evidence that there are no technical constraints that would preclude the development of the site for residential use. Importantly, we also agree with the conclusions of the PBA report and the Smeeden Foreman documentation that the site does not fulfil any of the five Green Belt roles prescribed within the NPPF.

Availability

It is clear that the site is available for development now as it is being promoted through the Local Development Plan process, and that yourselves, as the sole landowners, have agreed to sell the land if residential consent can be obtained. The site is available for residential development as there are no legal or ownership constraints and as national house builders Persimmon Homes, Bellway Homes, Barratt Homes and David Wilson Homes have expressed an aspiration to develop the site for residential use.

Achievability

On account of our experience of the housing industry and local housing market, we are extremely confident that a viable housing development can be delivered on the site within the next 5 years. We are aware that the national house builders Persimmon Homes, Bellway Homes, Barratt Homes and David Wilson Homes have expressed an aspiration to develop the site for residential use. Prior to the progression of development sites these companies undertake a thorough marketing and economic viability assessment for each site, including an assessment of any site specific abnormal costs. Therefore, the site is considered to be achievable for residential development now as there is a realistic prospect that the site can deliver new homes within the next 5 years.

Deliverability Conclusion

It is our view that the site can be considered a deliverable residential development site and its release would deliver significant economic and social benefits in the form of:-

- Construction Investment to the area;
- Creation of Direct & indirect employment opportunities;
- A mix of homes to deliver identified housing needs;
- Social Infrastructure investment to the area through Community Infrastructure Levy payments;
- Increased expenditure from residents to the area;
- Council Tax Payments & New Homes Bonus Payments which will help to sustain Council's services; and
- Investment into a successful local business that offers a large number of employment opportunities and which plays a major role in the area's economy.

Based on the justification provided above, we consider that the development of the Hunningley Lane, Worsborough Dale site will create a sustainable, high quality and accessible residential development which will provide significant social and economic benefits to the local area and the wider District.

Overall there are no adverse environmental impacts that would significantly and demonstrably outweigh the identified benefits of the proposed development. For the reasons identified above we consider that the development of the site would comply fully with national and local planning guidance in respect of deliverability.

CONCLUSION

It is our professional and independent view that the release of the Hunningley Lane site from the Green Belt and its allocation for residential development would be entirely in accordance with national and local planning guidance.

BMBC have identified in the Draft Barnsley Local Plan that the housing and employment needs and aspirations of the Borough cannot be accommodated without the need to release land from the Green Belt. Consequently the document identifies the proposal to take out of the Green Belt around 190 hectares of land for housing and around 70 hectares of land to be safeguarded in order to meet longer-term development needs stretching beyond the plan period. Therefore the release of a further 12.5ha of land from the Green Belt in order to deliver the identified benefits associated with the Hunningley Land site can be considered minimal in the wider scope of the Green Belt release proposed within the emerging Barnsley Local Plan.

Though we agree that it is likely that BMBC will need to release additional land from the Green Belt in order to meet their identified housing needs, we believe that even if this were not the case the Hunningley Lane site performs better against the NPPF's sustainable development and deliverability tests than a significant proportion of the other presently identified draft housing allocations set out in the emerging Barnsley Local Plan.

We therefore believe that this site should be released from the Green Belt for new homes either in place of, or in addition to, existing proposed housing allocations identified in the Draft Barnsley Local Plan.

Though a lot of focus has been provided in this letter on the site's ability to meet the sustainable development and deliverability policies of the NPPF, the final point we wish to make is the very real and important fact that there are a number of national house builders who have an aspiration to deliver new homes on this site as soon as possible.

We believe that the enthusiasm of these companies to invest approximately £40 million pounds into the site and into Barnsley should not be ignored and should be given great weight by BMBC in their future decision making in respect of the identification of housing allocations within the emerging Barnsley Local Plan.

Following your review of this letter should you need any further information, or clarity on any of the specific points made, then please do not hesitate to contact me.

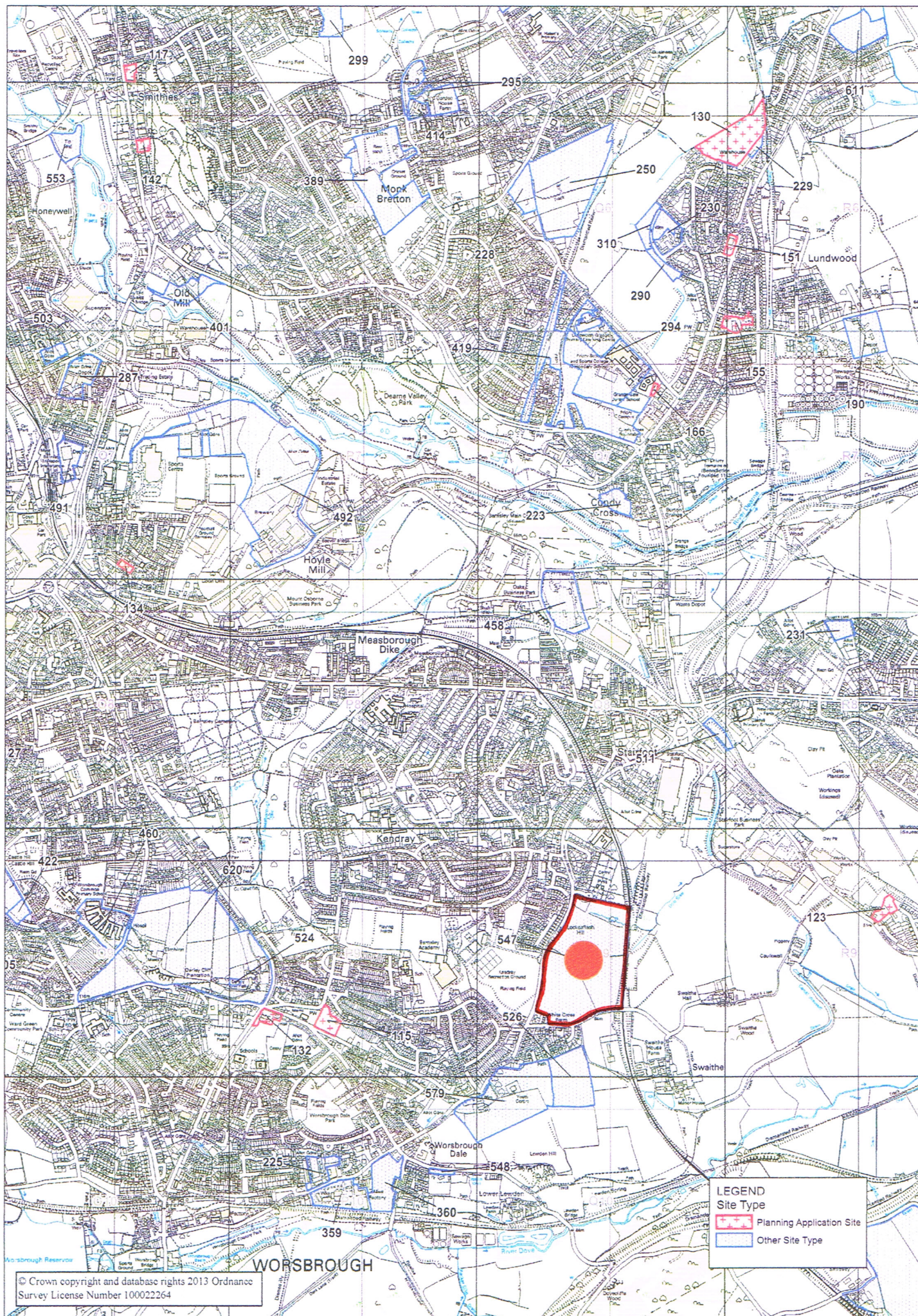
Yours sincerely,



PAUL BUTLER
Director

Enc.

Site Location Plan for Identification Purposes
Indicative Residential Layout



 = SITE EDGED RED FOR IDENTIFICATION PURPOSES



Hunningley Lane, Worsbrough

Illustrative Layout

Gross: 29.5 acres

Nett: 20.4 acres

329 Dwellings

