

Planning Policy Team
Economic Regeneration Service,
Barnsley Metropolitan Borough Council,
Westgate Plaza,
PO Box 604,
Barnsley,
S70 9FE

18th August 2016

Dear Sir or Madam,

BARNSELY LOCAL PLAN PUBLICATION DRAFT – YORKSHIRE LAND LIMITED – REPRESENTATIONS COVER LETTER

We write on behalf of our client Yorkshire Lane Limited (YLL) in response to the Barnsley Local Plan Publication Draft (BLPP), published in May 2016. This cover letter identifies the individual representations that YLL are submitting to Barnsley Metropolitan Borough Council in respect of their land interests in the Borough.

YLL has successfully developed land in the Barnsley Borough for over 29 years, bringing tens of millions of pounds' worth of investment to the area. Their focus has been to provide tangible benefits to enhance the local environment as part of their development schemes and they have never received grant funding of any type.

Our client currently holds five land interests within the Barnsley Metropolitan Borough area. These include: -

- Hunningley Lane, Worsbrough Dale - Currently designated as Green Belt and proposed to be retained within the Green Belt within the emerging Local Plan. The site lies within the defined Urban Area of Barnsley. The Urban Area of Barnsley is the main focus of growth in the Barnsley Borough. YLL's development proposals are to deliver a high quality residential development alongside new public open space. The site has firm interest from four national house builders.
- Land South of Halifax Road, Penistone – Currently designated as Green Belt but proposed as a housing allocation under Policy H82 within the emerging Barnsley Local Plan. The site lies within the defined Principal Town of Penistone. The Main focus for Growth within the West of the Barnsley Borough. YLL's development proposals are to deliver a high quality residential development alongside new public open space and local highways improvements. The site has national house builder interest from Barratt Homes & David Wilson Homes who have held pre-application discussions with the Council and are submitting separate representations to BMBC on this site.
- Oxspring Fields, Oxspring - Currently designated as Green Belt and proposed to be retained within the Green Belt within the emerging Local Plan. The site would serve the defined Village of Oxspring. No Housing allocations are currently proposed in the Villages. YLL's development proposals are to deliver a high quality residential development alongside significant new community facilities, including a new country park and funding towards the delivery of the sports pavilion and community building long desired by the local community. The site has national house builder interest.
- Blackmoor Business Park – Currently designated as Green Belt and proposed to be retained within the Green Belt within the emerging Local Plan. The site is a previously developed site located within a location that is accessible by foot, bicycle and public transport. YLL's proposal is to deliver a high quality business park on the site.

- Millstones, Oxspring – YLL's proposal is to deliver four executive homes to meet the identified qualitative housing needs of the Borough. The site is currently located in the Green Belt and is proposed to be retained in the Green Belt.

YLL believe that relevant sections of the BLPP should be amended in order for each of their land interests within Borough to be released for development. Robust planning arguments justifying this stance are presented within each of the site specific representations for YLL's five land interests listed above.

In addition to submission of individual representations associated with the above sites, YLL have also submitted representations on the updated and emerging evidence base documentation associated with the Community Infrastructure Levy.

Finally, we wish to place on record our desire to appear at the Examination on Public in respect of each of the individual topic areas which are covered in our submitted representations.

We wish to work closely with BMBC in respect of the preparation of future documentation associated with the emerging Local Plan. In this regard should you need any further information or wish to discuss anything further, please do not hesitate to contact me.

Kind regards,

A handwritten signature in blue ink, appearing to read 'P. Butler'.

PAUL BUTLER
Director



PB Planning

***Barnsley Publication Draft
Local Plan***

**Representations on behalf of
Yorkshire Land Limited**

Hunningley Lane, Worsbrough

August 2016

Strategy > Partnership > Delivery

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1.0 INTRODUCTION

- 1.1 We write on behalf of our client Yorkshire Lane Limited (YLL) to provide Barnsley Metropolitan Borough Council (BMBC) with our comments in response to the Barnsley Local Plan Publication Draft (BLPP), published in May 2016.
- 1.2 YLL has successfully developed land in the Barnsley Borough for over 29 years, bringing tens of millions of pounds' worth of investment to the area. Their focus has been to provide tangible benefits to enhance the local environment as part of their development schemes and they have never received grant funding of any type.
- 1.3 Our client currently holds five land interests within the Barnsley Metropolitan Borough area. These include: -
- Hunningley Lane, Worsbrough Dale - Currently designated as Green Belt and proposed to be retained within the Green Belt within the emerging Local Plan. The site lies within the defined Urban Area of Barnsley. The Urban Area of Barnsley is the main focus of growth in the Barnsley Borough. YLL's development proposals are to deliver a high quality residential development alongside new public open space. The site has firm interest from four national house builders. These representations are associated with this site.
 - Land South of Halifax Road, Penistone – Currently designated as Green Belt but proposed as a housing allocation under Policy H82 within the emerging Barnsley Local Plan. The site lies within the defined Principal Town of Penistone. The Main focus for Growth within the West of the Barnsley Borough. YLL's development proposals are to deliver a high quality residential development alongside new public open space and local highways improvements. The site has national house builder interest from Barratt Homes & David Wilson Homes who have held pre-application discussions with the Council and are submitting separate representations to BMBC on this site.
 - Oxspring Fields, Oxspring - Currently designated as Green Belt and proposed to be retained within the Green Belt within the emerging Local Plan. The site would serve the defined Village of Oxspring. No Housing allocations are currently proposed in the Villages. YLL's development proposals are to deliver a high quality residential development alongside significant new community facilities, including a new country park and funding towards the delivery of the sports pavilion and community building long desired by the local community. The site has national house builder interest. Separate representations are being submitted on behalf of YLL regarding this site.
 - Blackmoor Business Park – Currently designated as Green Belt and proposed to be retained within the Green Belt within the emerging Local Plan. The site is a previously developed site located within a location that is accessible by foot, bicycle and public transport. YLL's proposal is to deliver a high quality business park on the site. Separate representations are being submitted on behalf of YLL regarding this site.
 - Millstones, Oxspring – YLL's proposal is to deliver four executive homes to meet the identified qualitative housing needs of the Borough. The site is currently located in the Green Belt and is proposed to be retained in the Green Belt. Representations are being submitted by Peter Brett Associates regarding this site.
- 1.4 It is our view that YLL's Hunningley Lane site represents a deliverable residential development site; does not fulfil a Green Belt function; and is needed in order to meet the Borough's housing

needs on account of deliverability and capacity concerns associated with other proposed housing allocations located within the Borough. There are currently four national house builders whom are interested in delivering homes at the site immediately, namely Persimmon Homes, Barratt Homes, Bellway Homes and Avant Homes. This is a key consideration for BMBC as the same cannot be said for a large number of the other proposed housing allocations within the BLPP. The following sections of these representations provide our detailed response to BMBC's rejection of the site as a potential housing allocation.

- 1.5 It is our current view that the BLPP will need to be amended in order for it to be considered sound by a Government Appointed Inspector. With regards to the Hunningley Lane site the required amendments relate to the following: -
- The (lack of) robustness of the Green Belt Review on account of its assessment not including existing safeguarded sites and the disregarding of Arup's key comments and conclusions associated with the further review of suggested sub-divisions of assessed areas;
 - The proposed distribution of growth and housing allocations will not deliver the number and type of new homes required to meet BMBC's own housing needs aspirations set out within the BMBC Economic and Housing strategies; &
 - The evidence base associated with the identification of the proposed Safeguarded Land sites, the proposed quantum of safeguarded land and the wording of Policy GB6 are unsound and will not deliver long term Green Belt permanence.
- 1.6 BMBC are aware that YLL have previously consulted with leading Counsel Sasha White QC in respect of the approach of the previous Draft Barnsley Borough Local Plan (published November 2014). The Legal Opinion was submitted to BMBC enclosed to a covering letter by Walton & Co (planning Lawyers) dated 4th May 2016 and which corroborates a number of the concerns that are raised within these representations. Sasha White QC's Legal Opinion is enclosed with these representations (in Appendix 1) and is referenced throughout. YLL have retained the services of Sasha White QC and will continue to liaise with him in respect of future versions of the Barnsley Local Plan.
- 1.7 These representations seek to consider the strategic policy issues identified in Paragraph 1.5 above given their importance in respect of the overall soundness of the BLPP. These representations commence by providing detailed evidence in respect of the deliverability of the Hunningley Lane, Worsbrough Dale site. Further representations in respect of our serious concerns with the proposed Community Infrastructure Levy are provided under separate cover.
- 1.8 The comments we provide below consider local and national planning policy and practice guidance alongside our client's extensive experience and knowledge of investing in and

delivering development within the Barnsley Metropolitan Borough area throughout the past 29 years.

2.0 HUNNINGLEY LANE, WORSBROUGH DALE

- 2.1 This section of the document outlines YLL's grounds of **objection** to BMBC's rejection of the Hunningley Lane site. It is our understanding that the site was rejected on grounds of perceived impact on the Green Belt.
- 2.2 The Hunningley Lane site represents a deliverable and sustainable residential development site which would provide, as Arup acknowledge in the Barnsley Green Belt Review (Urban Barnsley and Royston Document, General Area UB12), a stronger Green Belt boundary and natural consolidation to the Urban Barnsley area in this location. Within this section of the representations we set out the planning arguments justifying the site's deliverability. A more detailed assessment demonstrating that the site does not meet the NPPF's Green Belt purposes and how it should be released from the Green Belt for development is set out in Section 3.
- 2.3 The evidence provided within this section of the representations has previously been submitted to BMBC within the report prepared by Peter Brett Associates (PBA) dated January 2015; Spawforths dated April 2014; and Smeeden Foreman in the form of a Landscape Statement dated May 2014 and subsequent Letter dated 9th January 2015. This information is enclosed in Appendix 2 and we ask that this is read in conjunction with the additional information provided in this representation.
- 2.4 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 housing needs of the Urban Barnsley area. 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.
- 2.5 The development of the site will deliver high quality homes within the identified Urban Barnsley area. Urban Barnsley is identified within the BLPP as the focus of new housing development in the Borough 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, community services and schooling including Hunningley Primary School, Barnsley Academy (secondary school) and Sixth Form. The development will help to sustain local services and facilities by providing new retail and leisure expenditure.
- 2.6 The indicative residential layout (prepared by Persimmon Homes) enclosed in Appendix 3 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 a letter prepared by Persimmon Homes dated 7th January 2015 and enclosed within the promotional report prepared by PBA and submitted to BMBC, 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. 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.

- 2.7 Persimmon Homes' indicative residential layout 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.
- 2.8 In respect of the above, Persimmon Homes have again written to BMBC by letter dated 18th August 2016 (enclosed in Appendix 4) to reiterate their interest in the site and to request its allocation for housing development within future versions of the Barnsley Local Plan. The letter re-asserts Persimmon Homes' view that there are no technical constraints that cannot be overcome through the planning process in respect of the site's delivery and the site presents an opportunity to provide sustainable housing development immediately. The letter further identifies that Persimmon Homes are highly concerned that the Local Plan seeks to identify a large number of allocations in the east of the Borough, in and around the Dearne Towns area. In this respect the letter identifies that: -

"Whilst we agree that some new development and regeneration efforts are required here, such areas are already specifically acknowledged by the Council in the BLPP (Policy H9) to have low housing demand, exhibiting weak and at times failing housing markets, and it is for these reasons that we, alongside a number of our market competitors, are unwilling to take on significant exposure within these areas. This further emphasises the need to allocate deliverable and market facing sites with acknowledged developer interest, such as this site at Hunningley Lane."

- 2.9 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 and the recognised need to deliver a step change in the quality and mix of housing available in the Borough through working in collaboration with the private sector to deliver a housing mix which meets the future requirements of the Borough.
- 2.10 We believe that the 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.
- 2.11 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.

- 2.12 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.
- 2.13 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.
- 2.14 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 authority's budgets are being reduced these areas of financial gain can provide beneficial ways in which Councils can continue to support their communities.
- 2.15 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.
- 2.16 In respect of the site being situated in a sustainable location, the BLPP 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"*.
- 2.17 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 and sixth form (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 (which do not benefit from the same proximity to facilities) 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.

- 2.18 The main environmental consideration associated with the site's development is its current location within the designated Barnsley Green Belt. However, it is clear that the site does not fulfil any of the five Green Belt purposes identified within Paragraph 80 of the NPPF. This conclusion is supported by the Hunningley Lane Landscape Statement which sets out the findings of a Landscape assessment undertaken by consultants Smeeden Foreman at the request of YLL in May 2014. As set out above, the Landscape Statement has previously been provided to BMBC in submissions to earlier consultations regarding the Barnsley Local Plan, and is enclosed at Appendix 2.
- 2.19 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 between strong, permanent, defensible boundaries. We agree with the conclusions made in the previously submitted PBA and Smeeden Foreman 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. Indeed, as set out above, Arup identified within their Green Belt Review that development at a large part of the site (calculated to be approximately 11 acres) would form 'Natural Consolidation': -
- "A small-scale area of natural consolidation exists to the south of Lockeafish Cemetery, on the land bounded by Dob Sike"***
- 2.20 We enclose an image at Appendix 5 illustrating the position of Dob Sike, which runs through the Hunningley Lane site. This point is discussed in further detail in Section 3 of these representations.
- 2.21 The proposed area of housing would only extend a modest distance beyond the existing residential area at the eastern end of Worsbrough Dale, accordingly 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 and prevent any further development in this location.
- 2.22 Furthermore, Smeeden Foreman have undertaken a more recent assessment of the site on account of advice YLL received from Sasha White QC specifically relating to his appraisal of the ARUP Green Belt Review. Their assessment, dated 4th May 2016, which is enclosed with this representation at Appendix 6 concludes that the release of the Hunningley Lane site from the Green Belt would **strengthen** the Green Belt in this location of the Borough, not weaken it, whilst also maintaining the Strategic Gap of 1.5km between Urban Barnsley and Wombwell and which Arup identify should not be diminished by any development: -
- "...the physical distance between Urban Barnsley and Wombwell remains Pronounced. Therefore, any development within (General Area) UB12 must not result in a reduction of this gap."***

2.23 Smeeden Foreman's letter succinctly provides reasoning to justify this conclusion. The key points made in the letter are as follows: -

- The Barnsley Green Belt Review at 14.1.2 provides a narrative of the tabular presentation of the Green Belt Assessment for General Area UB12 and amongst other points records *"This general area serves to protect a strategic gap of 1.5 km between Urban Barnsley and Wombwell..."*. Taking a representative point on the edge of Wombwell it can be seen that the proposed allocation site Ref. AC14 (BLPP Employment Site Reference UB16) falls on the edge of a 1.5km radius, with a small portion of the site within the radius. This situation is directly comparable with the proposed Hunningley Lane site which falls completely outside the 1.5km radius drawn from Wombwell. This clearly illustrates that the proposed development of the Hunningley Lane site does not compromise the strategic Green Belt gap.
- The Green Belt Review in the section addressing 'Level of Containment' states that where areas are highly contained within the urban form (50% and above) development in such areas would represent a natural rounding of the built form. The Green Belt Review notes that *"A small-scale of natural consolidation exists to the south of the Lockeafish Cemetery, on the land bounded by the operational railway and to the south by Dob Sike."* (this area is calculated to be approximately 11 acres in size) The enclosed illustrations clearly identify the location of Dob Sike and thus this conclusion supports the allocation of at least the northern part of the Hunningley Lane site. Where Smeeden Foreman believe this is insufficient is in not including the land to the south of Dob Sike which is itself contained to the south by the White Cross Lane residential development. As the Green Belt boundary in this location is considered to be *"relatively weak"* and with respect to the area about Hunningley Lane *"To the west the Green Belt boundary is weakly defined by built form around White Cross Lane which has sprawled beyond the B6100 Ardsley Road"* (Ardsley Road being known as Hunningley Lane north of White Cross Lane). Taken together this would form a well-defined edge to the area and allow the urban pattern to be consolidated in a natural rounding of the built form. This pattern of development would be wholly consistent with the proposed allocation of Site Ref. AC14. Assuming that the Hunningley Lane site were developed with two storey houses this site would not be visible from Wombwell, unlike parts of the proposed AC14 (BLPP Reference UB16) site.
- The Hunningley Lane site boundary with the Green Belt would be defined by a deep cutting to an active railway, a feature the Green Belt review in other areas considered to be a desirable Green Belt boundary. The Green Belt Review also records; *"An operational railway line which traverses the General Area from north to south could constitute a strong durable boundary should the area be considered for sub-division"*. The railway adjacent to the Hunningley lane site is contained within a deep cutting and is within a well wooded corridor, with fairly extensive woodland on the eastern side of the railway. Were the Green Belt boundary to be re-drawn to exclude the Hunningley Lane site the boundary would be formed by the railway line and the Green Belt would gain a well-defined and durable boundary to a large part of the north western edge of the retained Green Belt.
- The 'green wedge' between Kendray and Worsbrough Dale (identified in the Green Belt Review as General Area UB13) is extensively developed with the buildings of Barnsley Academy and the Power League Five A-Side football hall, as well as with sports field to both east and west of the buildings and with associated roads, car parks and fences. These features surrounded by the adjacent housing diminish any perception of 'openness', and the area does not contribute to the strategic Green Belt between Barnsley and Wombwell. Illustrative layouts for development at Hunningley Lane demonstrate the capacity of this site to accommodate significant numbers of dwellings whilst leaving a generous open corridor east – west through the site along Dob Sike and also a substantial area along the railway line. Such areas would be capable of landscape and ecological improvement to the benefit of the surrounding area and for new residents. More importantly public access across the site would be available and would connect to those routes within the Green Wedge to the west and provide off-road connectivity to the rail over-bridge at White Cross Lane and improve safe access into the countryside to the east. This approach would enhance the

value of the existing Green Infrastructure in the gap between Kendray and Worsbrough Dale (UB13).

- The Green Belt Review concluded (at 14.1.2) that, “*The General Area also has a strong role in preserving the setting and special character of the historic assets at Swaithe.*” Swaithe Hall Farm is on a high point above the valley of the River Dove which flows between Swaithe and Wombwell. This rising ground restricts views from Wombwell towards the Hunningley Lane site, but provides a vantage point for Swaithe Hall Farm. In many views the large scale commercial buildings at Stairfoot, seen in the enclosed visuals, are a principle detracting element to the setting of the listed buildings, which exceed any impacts from housing in the vicinity. Where filtered views exist towards the Hunningley Lane site they are above the vegetation fringing the railway line, however these views include the existing dwellings and developments along Hunningley Lane and whilst new dwellings would be closer they would not comprise a new element in the view and a significant belt of agricultural land and trees would continue to provide separation from Urban Barnsley. The trees providing a screen within the garden of these buildings prevent views southward towards the area from Hunningley Lane. On this basis Smeeden Foreman conclude that they do not anticipate any significant adverse effect on the setting of listed buildings.

- 2.24 On account of the conclusions reached in their supplementary assessment, Smeeden Foreman determine the following: -

Having considered our previous comments and landscape assessment I am confirmed in the view that a development at Hunningley Lane could not harm the existing effectiveness of the Green Belt. By utilising the railway as a new edge to the Green Belt in this area it would be possible to satisfy the National Planning Policy Framework requirement expressed in paragraph 85 to “.....define boundaries clearly, using physical features that are readily recognisable and likely to be permanent”.

The area west of Hunningley Lane which forms a green area between Kendray and the Worsbrough Dale area does not contribute to the strategic 1.5 km Green Belt between Barnsley and Wombwell and any potential perception of ‘openness’ is diminished by extensive educational and sports facilities. The area has valuable Green Infrastructure benefits which can be linked through new cycle footway connections through the Hunningley Lane site out into the wider countryside to the benefit of existing local residents as well as occupiers of new dwellings. The Hunningley Lane Site is outside the identified 1.5 km strategic gap created by the Green Belt between Wombwell and Barnsley, in common with the similarly situated proposed allocation AC14 (BLPP Employment Site Reference UB16), and in my assessment the visual impact of any development upon the Green Belt would be too slight to compromise the landscape character of the Green Belt and diminish the effectiveness of the Green Belt in providing a distinct landscape between the two built-up areas.

- 2.25 The enclosed Smeeden Foreman letter dated 4th May 2016 provides a re-assessment of Arup’s conclusions against the five green belt purposes, further to their earlier assessment which is included within the Landscape Statement. The re-assessment identifies that the removal of the Hunningley Lane site from the Green Belt would result in a **strengthening** of the remaining wider parcel of green belt (extending to approximately 175 hectares) located in General Area UB12.
- 2.26 The development of the site could therefore have a wider benefit to the Green Belt of redefining and strengthening the existing urban edge through a sensitively designed scheme. The redevelopment of the site would also provide a long term permanent boundary to the Barnsley Green Belt in this location.

2.27 The information previously submitted to the Council concludes 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. **Would clearly not lead to unrestricted sprawl of the built-up area** due to the site's defensible boundaries on all sides and as it measures 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. **Would not lead to coalescence of any settlements** as a significant strategic gap of 1.5km between Urban Barnsley and Wombwell would be maintained and strengthened through the appropriate rounding off of the settlement form of the area between clearly defined boundaries;
3. **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 to the east and White Cross Lane to the south. The site's development could provide new countryside access opportunities through the provision of public open space;
4. **Would not harm the setting and character of an historic town or listed buildings** as new dwellings would not comprise a new element in the view and a significant belt of agricultural land and trees would continue to provide separation from Urban Barnsley. The openness of the immediate area of the listed buildings would entirely be retained; and
5. **Would not have an adverse effect in relation to urban regeneration** given the site's location within the identified growth area of Urban Barnsley. The main focus for Housing Growth in the Borough.

2.28 In respect of other potential environmental matters, 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 prelude development of the site;
- 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 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.

2.29 The evidence provided in these representations provides clear evidence that the development of the Hunningley Lane site would comply with the environmental role of sustainable development as prescribed by the NPPF.

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

2.31 Accordingly, the site can be considered deliverable when assessed against the criteria prescribed by Footnote 11 of Paragraph 47 of the NPPF. We believe that the site is located in

a suitable location for residential development now. It is clear that the site is available for development now as it is being promoted through the Barnsley Local Plan process and the sole landowners have agreed to sell the land if residential consent can be obtained. With regards to achievability we are extremely confident that a viable housing development can be delivered on the site within the next 5 years. National house builders Avant Homes Persimmon Homes, Bellway Homes, Barratt Homes and David Wilson Homes have expressed an aspiration to develop the site for residential use. Letters from the house builders submitted to YLL in support of the site are enclosed with this letter. 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.

- 2.32 Based on the justification provided above, we consider that the development of the Hunningley Lane 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.
- 2.33 There are no adverse environmental impacts that would significantly and demonstrably outweigh the identified benefits of the proposed development. For the reasons identified above and within Section 3 of these representations we consider that the development of the site would comply fully with national and local planning guidance in respect of deliverability.
- 2.34 These representations identify in Section 4 that BMBC will need to release additional land from the Green Belt in order to meet their identified housing needs. Even if this were not the case the Hunningley Lane site, situated within Urban Barnsley, 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 BLPP.
- 2.35 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 and proposed housing allocations identified in the BLPP.
- 2.36 The final point we wish to emphasise 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, many of which are currently proposed within areas of low housing demand with weak and at times failing housing markets (BLPP Policy H9 - Housing Regeneration Areas). Especially given BMBC's own well documented concerns over the viability of future housing development within the poorer market areas of the Borough.

- 2.37 Finally, we think it is important at this point to identify the clear inaccuracies in BMBC's 2016 Strategic Housing and Employment Availability Assessment (SHELAA) update work undertaken by ARUP in respect of the site. Enclosed with these representations is a letter from Peter Brett Associates (PBA), dated 19th August 2016 (enclosed in Appendix 7) which identifies *"factually incorrect information and seriously flawed assumptions in the Strategic Housing and Employment Land Availability Assessment Update 2016"*.
- 2.38 In respect of the Hunningley Lane site, the letter starts by identifying that the 2013 Barnsley SHLAA identified the Hunningley Lane site (Unique Identifier Reference 547) as being a Category 2 development site having been initially assessed to be located adjacent to Urban Barnsley (whereas it is actually within) and on account of achievability issues where it was deemed only 'moderately attractive' to the market. It is clear from the evidence provided above that there should be no such achievability concerns given that four national house builders Avant Homes, Persimmon Homes, Bellway Homes, Barratt Homes and David Wilson Homes have expressed an aspiration to develop the site for residential use at the earliest opportunity. Accordingly, and at the request of YLL, P B A updated the SHLAA data for this site and wrote to BMBC to make known that the site should be considered a Category 1 site in accordance with the 2013 Barnsley SHLAA assessment criteria.
- 2.39 The PBA letter then seeks to respond to the 2016 SHELAA update work undertaken by ARUP in respect of the site, highlighting erroneous information in several areas of the Arup assessment and providing the correct information in order to provide a balanced assessment. The letter concludes that the Hunningley Lane site should again be considered a deliverable residential development site. We request that the detailed information contained in their enclosed letter is reviewed by BMBC alongside these representations.

3.0 GREEN BELT REVIEW

- 3.1 This section of the document outlines YLL's identified concerns associated with the soundness of the BLPP in relation to: -
- The robustness of the Green Belt Review on account of its assessment not including existing safeguarded sites and the disregarding of Arup's key comments and conclusions associated with the further review of suggested sub-divisions of assessed areas.
- 3.2 Accordingly, this section of the representations identified YLL's grounds of **objection** to the following policies of the BLPP: -
- Policy GB1 – Protection of Green Belt – The Barnsley Green Belt should be amended to include YLL's development proposals at Hunningley Lane, Worsbrough on account of BMBC's own evidence base and in order to enable sustainable growth to meet the identified housing needs of the Borough.
 - Policy GB6 – Safeguarded Land – A robust assessment of each of the existing safeguarded land sites in the Borough should have been undertaken as part of the Green Belt Review.
- 3.3 In 2014, 'Arup was appointed by BMBC to assist with the preparation of the Barnsley Green Belt Review, which forms an important part of the evidence base of the Barnsley Local Plan. The purpose of the Green Belt review is to provide an independent and objective appraisal of the existing Barnsley Green Belt against the five nationally-defined purposes of the Green Belt.
- 3.4 An initial general concern is that the Green Belt Review did not undertake an assessment of any of the existing safeguarded land designations in the Borough against the five purposes of the Green Belt.
- 3.5 We consider it quite disconcerting that safeguarded sites were not assessed within the Barnsley Green Belt Review. Historical decisions taken over fifty years ago in respect of the allocation/designation of land and the pattern of settlement growth should not simply be repeated. The characteristics of both proposed development sites and the character of settlements and their surrounding area can substantially change over the course of time, as can planning policy and guidance. Furthermore, new and/or additional development sites can be promoted by land owners during a Development Plan Review which provide, in some instances, more appropriate development opportunities in light of up to date evidence and planning policy.
- 3.6 As a starting point we believe that it is of paramount importance that when identifying site allocations and land designations within the emerging Barnsley Local Plan, an up to date assessment of all proposed and safeguarded development sites should be undertaken. Not simply newly proposed sites, especially where existing sites were removed from the Green Belt in the 1960's. Over 50 years ago.

3.7 In addition, we consider the identified land parcels of assessment to be too big in size and that they do not conform to existing physical boundaries which would on many occasions deliver strong, defensible, Green Belt boundaries. Such an approach is illogical.

3.8 Similar concerns to those that we raise above in respect of the soundness of the Green Belt Review have also been identified by Inspector Stephen Pratt, whom criticised the Green Belt assessment used to inform the emerging Cheshire East Local Plan, which was also undertaken by Arup. In his 'Interim Views' report, which consequently resulted in the suspension of the examination hearings, Inspector Pratt concluded that the process and evidence relating to the proposed amendments to the Green Belt were flawed. The following paragraphs from the report highlight the Inspector's key concerns: -

'...in some cases, land which makes a major or significant contribution to the Green Belt is proposed for release, whilst other sites which only make a limited contribution to the Green Belt do not seem to have been selected. Although the release of land from the Green Belt was based on several factors, this suggests that insufficient weight may have been given to the status and value of certain sites in Green Belt terms compared with other factors such as land ownership, availability and deliverability, when preparing and finalising the plan.'

Inspector Pratt, Interim Views, para 83

'...although the assessment does not recommend the release of specific sites and aims to identify strategic land parcels, it seems somewhat inconsistent in assessing relatively large tracts of land in some cases, whilst dealing with much smaller sites in other areas; it may not be as finely grained as it could have been, omitting some smaller parcels of land on the fringes of settlements which might have had less impact on Green Belt purposes.'

Inspector Pratt, Interim Views, para 85.

3.9 We believe that a more detailed Green Belt assessment should be undertaken which considers each of the points we raise above. Without the undertaking of this further work we are of the view that it is highly probable that an inspector will also find the Barnsley Green Belt Review flawed for similar reasons to those identified above, which could lead to the whole emerging Barnsley Local Plan being considered unsound.

3.10 BMBC's key reason for discounting the Hunningley Lane site is associated with its current location within the designated Barnsley Green Belt. However, as set out above it is clear from the professional opinions of Smeeden Foreman, Peter Brett Associates, Spawforth Associates and ourselves, that the site does not fulfil any of the five Green Belt purposes identified within Paragraph 80 of the NPPF, and accordingly that there are no reasonable planning grounds which should preclude the allocation of the site for housing development purposes.

- 3.11 The site is located on the north western edge of the assessed General Area UB12 within the ARUP Barnsley Green Belt Review. Arup's Key conclusions in respect of this land parcel identify the following in reference to the Hunningley Lane Site: -
- *To the west, the Green Belt boundary is weakly defined by built form around White Cross Lane which has sprawled beyond the B6100 Ardsley Road. On the whole, the existing Green Belt boundary is considered to be relatively weak.*
 - *An operational railway line which traverses the General Area from north to south could constitute a strongly durable boundary should the area be considered for sub-division.*
 - *Green Belt boundaries to the north east and west are also weakly defined by built form. Development to the north east and west of the General Area could have a relatively strong functional relationship with the built form of Urban Barnsley.*
- 3.12 Notwithstanding the above the ARUP Green Belt Review concludes that the General Area UB12 plays a strong role in safeguarding the countryside from encroachment, Consequently, the assessment confirms that no further resultant land parcels would be identified for further/closer review and thus ignoring their key conclusions presented within the three bullet points above.
- 3.13 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 on all sides. The sites release from the Green Belt would not constitute a significant incursion into the Green Belt as demonstrated in the plans included within the Smeeden Foreman Hunningley Lane Landscape Statement which was undertaken in May 2014 and is enclosed as part of our letter dated 16th September 2015 (appendix 2).
- 3.14 The proposed development would only extend a modest distance beyond the existing residential area at the eastern end of Worsbrough Dale, and any further encroachment into the Green Belt beyond is not possible due to the presence of the railway line to the east and White Cross Lane to the south, the B6100 'Hunningley Lane' to the west and existing built form to the north, which all form strong, permanent physical boundaries preventing Urban Sprawl.
- 3.15 On account of the above we believe that our client's proposals have not been assessed appropriately within the Barnsley Green Belt Review as they have been included within an assessment area where land to the east of the existing railway line shares entirely different environmental characteristics to that located to the west. We believe this provides a further valid reason to warrant a review of the Green Belt document prior to publication of further versions of the Barnsley Local Plan. In making this point we wish to refer back to the Inspector's quotes provided within paragraph 3.8 above.
- 3.16 Following further discussions with BMBC Officers we are aware that the site was initially excluded on grounds that the larger land parcel in which it is located serves a Green Belt purpose in respect of avoiding coalescence between the Urban Area of Barnsley and the

Principal Town of Wombwell. This provides further evidence on the inaccuracy of the proposed parcels within the ARUP Green Belt Review given that it has ignored the strong defensible boundary created by the existing railway line located to the east of the Hunningley Lane site. Importantly, the remaining areas of land assessed in General Area UB12 are all located out with the defensible boundaries of the site made up in the east of the existing railway line and in the south of White Cross Lane, meaning any development of the site would thus not have an impact in respect of coalescence between these two settlement areas. Following any development of the site the distance between the eastern edge of Worsbrough Dale and Wombwell would be retained at 1.5km.

3.17 We also acknowledge and agree with Smeeden Foreman's opinion (enclosed as part of our letter dated 16th September 2016) 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. When considered together the redevelopment of the site would provide a long term permanent boundary to the Barnsley Green Belt in this location.

3.18 As stated in Section 2 above, we believe that the Hunningley Lane site does not fulfil any of the five Green Belt purposes identified in Paragraph 80 of the Framework for the following reasons:

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1. **Would clearly not lead to unrestricted sprawl of the built-up area** due to the site's defensible boundaries on all sides and as it measures 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. **Would not lead to coalescence of any settlements** as a significant strategic gap of 1.5km would be maintained and strengthened between the site and Wombwell through the appropriate rounding off of the settlement form of the area between clearly defined boundaries;
3. **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 to the east and White Cross Lane to the south. The site's development could provide new countryside access opportunities through the provision of public open space;
4. **Would not harm the setting and character of an historic town or listed buildings** as new dwellings would not comprise a new element in the view and a significant belt of agricultural land and trees would continue to provide separation from Urban Barnsley. The openness of the immediate area of the listed buildings would entirely be retained; and
5. **Would not have an adverse effect in relation to urban regeneration** given the site's location within Urban Barnsley. The main focus for Housing Growth in the Borough.

3.19 We believe that the General Areas 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. 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 site from the Green Belt.

3.20 The conclusions we identify above also need to be considered against those presented in the 2013 Barnsley SHLAA, which when properly updated to take account of the original inaccuracies in relation to location and achievability (the site is actually located within Urban Barnsley - not adjacent - and is considered highly attractive – not moderately attractive - benefiting from the firm interest of four national housebuilders) in accordance with the endorsement of PBA (who undertook the SHLAA on behalf of Barnsley Council) identifies the Hunningley Lane site as being a Category 1 deliverable development site.. We identified in Section 2 of these representations that the national house builders Avant, Persimmon Homes, Bellway Homes, Barratt Homes and David Wilson Homes have all expressed an aspiration to develop the site for residential use at the earliest opportunity. Section 2 of these representations also demonstrates that the site can be considered to be suitable, available and achievable in the context of Footnote 11 of paragraph 47 of the Framework.

3.21 The ARUP Barnsley Green Belt Review identifies a Methodology Flow Diagram for Green Belt Review in Figure 1.1. The figure is presented within each of the statements associated with the assessed areas of the Borough and in respect of the Hunningley Lane site it can be found on Page 5. The methodology contains three stages. The bullet points below briefly assess the Hunningley Lane site against each of the three stages utilising the evidence provided above: -

1. *Does the assessment demonstrate that the current green belt is not fulfilling the purposes as defined in NPPF?*

Yes. Both ARUP's own assessment and the further work undertaken by Smeeden Foreman, Spawforth Associates, Peter Brett Associates and ourselves, identify that not only does the Hunningley Lane site not fulfil any Green Belt purposes, but that the site's development could also strengthen existing weak and fragmented Green Belt boundaries in this location.

2. *Does the assessment demonstrate that land is suitable and has least constraints?*

Yes. The site is identified as a Category 1 deliverable residential development site within the 2013 SHLAA and further evidence is provided above in Section 2 of these representations which identifies that the site is located in Urban Barnsley and that four national house builders have a firm interest in developing the site at the earliest opportunity. Accordingly, there are no constraints associated with the development of new homes at the site. As BMBC accept that land is needed to be released from the Green Belt to deliver the Borough's housing and employments needs, the release of such sites should be given priority where they do not fulfil Green Belt purposes.

3. *Does the assessment demonstrate that new land parcel meets green belt purposes as defined in NPPF?*

Yes. For the reasons identified above the site should be removed from the Green Belt. Its removal would both strengthen the surrounding Green Belt through the delivery of long term defensible boundaries, whilst in turn providing a deliverable residential development site that can contribute significantly towards the supply of new housing required to meet the Borough's housing needs.

3.22 BMBC are aware that YLL have consulted with Leading Counsel Sasha White QC in respect of the evidence provided above in relation to the Hunningley Lane proposals. Sasha White QC's Legal Opinion is enclosed with these representations (Appendix 1). Some of the key points raised by Sasha White QC in respect of the Green Belt Review's methodology are as follows: -

- *Para 28 - Further, on the facts relating to the two YLL sites, it would seem to me that there has been a clear failure properly to analyse the merits of releasing land from the Green Belt consisting of smaller areas than the general areas identified in the review. Whilst in other locations the Green Belt review process leads to an analysis of "resultant parcels" where release could be considered, there is no such analysis in respect of the YLL sites. I consider this at least arguably unsound given that in the case of both PEN11 and UB12 (discussed further below), the Arup reports recognise (a) the absence of defensible boundaries for the whole of the general areas but (b) the existence of features within the general areas which could form defensible Green Belt boundaries. It seems to me that a sound Green Belt review should, when faced with that evidence, go on to consider whether the purposes of the Green Belt in that location could be served by adjusting the boundary to reflect the defensible boundaries identified (i.e., the Trans Pennine Trail in PEN11 and the operational railway line in UB12). I can see no consideration whatsoever of that possibility.*
- *Para 29 - The effect of this lack of analysis is particularly acute given that neither of the YLL sites appears to fulfil the purposes of Green Belt as identified in the NPPF.*
- *Para 30 - In those circumstances, my view is that the Arup Green Belt review lacks robustness, at least in respect of the two sites which YLL promotes for development.*

3.23 As identified in Section 2 of these representations, the advice from Sasha White QC also provides specific comments in relation to the Hunningley Lane site in paragraphs 21, 22 and 31 to 33. Following a review of the advice of Sasha White QC, YLL asked Smeeden Foreman to review the findings of their initial Landscape Appraisal. The results of this assessment are set out in the Smeeden Foreman letter dated 14th May 2016 (enclosed in Appendix 6), are summarised in Paragraphs 2.23 & 2.24 above and will not be repeated here for brevity.

3.24 Smeeden Foreman's re-assessment of Arup's conclusions against the five green belt purposes identified that the removal of the Hunningley Lane site from the Green Belt would result in a **strengthening** of the remaining parcel of green belt located in General Area UB12.

3.25 When considered together the enclosed Legal Opinion of Sasha White QC and the reviewed Smeeden Foreman landscape appraisal provide compelling evidence to justify the release of the Hunningley Lane site from the Green Belt. Importantly, both of these documents utilise BMBC's own evidence in reaching their conclusions.

3.26 We maintain our opinion that there are no known planning grounds for the Council to maintain their stance in respect of the retaining the Hunningley Lane site within the Green Belt. The site clearly does not meet any of the identified Green Belt purposes and the site's release would be consistent with BMBC's decisions associated with the release of other land from the Green Belt in the Borough.

4.0 DELIVERY OF IDENTIFIED HOUSING NEEDS

4.1 This section of the document outlines YLL's identified concerns associated with the soundness of the emerging Barnsley Local Plan specifically in relation to our belief that: -

- The proposed distribution of growth and housing allocations will not deliver the number and type of new homes required to meet BMBC's own housing needs and aspirations set out within its adopted Economic and Housing strategies.

4.2 Accordingly, this section of the representations identifies YLL's grounds of **objection** to the following policies of the BLPP: -

- Policy H3 – Housing Site Policies – We believe that additional sites are required to be allocated and released in order to meet the identified qualitative and quantitative housing needs of the Borough on grounds of issues associated with the deliverability of a significant number of the housing allocations currently proposed.
- Policy GB1 – Protection of Green Belt – The Barnsley Green Belt should be amended to include YLL's development proposals on account of BMBC's own evidence base support and in order to enable sustainable growth at deliverable housing sites to help meet the identified qualitative and quantitative housing needs of the Borough.

The Number of New Homes to be Built

4.3 Firstly, our client wishes to comment on Policy H1 of the BLPP which is associated with the number of new homes to be built in the Borough over the local plan period. The plan seeks to deliver at least 20,900 net new dwellings over the plan period (2014 to 2033). This is identified to be provided at an average rate of 1,100 dwellings per annum (dpa). YLL support the reference in the policy to the housing requirement being identified as a net minimum.

4.4 Paragraph 9.2 of the BLPP states that the net plan target of 1,100dpa is anticipated to evolve up until the point at which Local Plan is submitted to the Planning Inspectorate for examination in order to ensure that the plan is based upon the most up to date evidence available at the time of submission. YLL are supportive of this approach and an important element of the evidence that requires consideration is the recent release of the 2014 based sub national population and household projections, which update the 2012 based projections upon which BMBC's 2016 *Housing Background Paper* is based. The National Planning Practice Guidance (NPPG) is clear that the most recent projections should form the 'starting point' for determining the objectively assessed housing needs and housing requirement within an area.

4.5 The 2014 projections (845 homes) identify a 64 dwelling per annum increase from the 2012 projections (781 homes). Though the increase in dwellings has not been comprehensively modelled at this point initial evidence does suggest that this work would lead to an evidenced base increase above the current 1,100 home annual requirement proposed by Policy H1 of the BLPP.

- 4.6 BMBC's currently proposed housing requirements are influenced by recent delivery rates over a period of economic recession. Accordingly, YLL are of the view that BMBC shouldn't seek to model upon recessionary conditions, particularly when it is clear from BMBC's Annual Monitoring Reports that housing completions have been greater than 1,300 homes previously. The current trajectory for 2016 is higher than 1,450 homes, providing evidence of the attainability of a higher housing target.
- 4.7 From a review of BMBC's evidence base, it is apparent that the identified housing requirement is at the lower end of the identified range of options. We are therefore unsure how this figure is related to the Council's economic aspirations in respect of job creation over the plan period. Not only in the Borough itself, but also in support of the City Regions of Leeds and Sheffield. The BLPP identifies the aspiration to deliver 17,500 jobs over the next 20 years. The Sheffield City Region are seeking to deliver 70,000 new jobs over the next 10 years and the Leeds City Region proposes to create 62,000 new jobs by the year 2021.
- 4.8 The impact of the proposed level of job creation needs to be given sufficient weight by BMBC in the review of their housing requirements prior to the submission of the Local Plan. The Housing Background Paper identifies that the number of homes needed to meet the figure closest to BMBC's proposed level of jobs growth (a scenario of 19,833 jobs over the plan period) would be between 1,475 homes and 1,649 homes per annum; much higher than the proposed 1,100 home annual requirement set out in Policy H1 of the BLPP.
- 4.9 The Local Plan provides the opportunity for BMBC to set aspirational, yet realistic, housing targets to seek to meet the Borough's economic objectives (discussed further below). Through the provision of a higher supply target and the allocation of deliverable residential development sites, situated in locations attractive to the development industry, the delivery of a higher housing requirement is realistically attainable.
- 4.10 From the evidence currently presented by BMBC we expect that the number of homes to be delivered in the Borough will need to be increases above the 1,100 homes per annum target currently identified.

Meeting Barnsley's Qualitative House Needs

- 4.11 We are concerned that BMBC's identification of sites within the BLPP process does not take into consideration its own evidence base with regard to the adopted Economic Strategy, Housing Strategy and the Strategic Housing Market Assessment (SHMA). A significant proportion of the proposed sites will not deliver the type of housing which has been assessed to be needed in the Borough and are not located in identified areas of strong housing demand.

- 4.12 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.
- 4.13 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 the BMBC will need to work in collaboration with the private sector to deliver a housing mix which meets the future requirements of the Borough.
- 4.14 The Economic Strategy identifies the importance of changing the housing mix within the Borough, particularly in terms of delivering lower-density housing and increasing the breadth of housing supply. It is well documented that Barnsley has experienced the trend of more people on higher and medium incomes moving out of the Borough than are moving in, which of course can be attributed to the fact they are unable to find suitable housing options to meet their needs.
- 4.15 BMBC's adopted Economic Strategy also 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. An identified issue that requires tackling to solve the economic issues of the Borough is the "*inadequate supply of appropriate development sites and executive housing*".
- 4.16 BMBC's adopted Housing Strategy for the period 2014-2033 reiterates the key messages of the adopted Economic Strategy. It again identifies the key objective of increasing the number of larger (4 and 5 bed) family/higher value homes across the Borough and specifically identifies the objective of delivering "*c.2500 larger family/higher value homes*" in the strategy period. However, there is no proposed policy within the Draft Local Plan associated with ensuring the delivery of new larger family/higher value homes in the Borough.
- 4.17 In respect of the type of new homes required, pages 81 to 83 of the Barnsley SHMA, published November 2014, again acknowledge that a provision of executive dwellings is needed to support economic growth and to address social imbalances by pulling higher income earners into Barnsley. Indeed, the SHMA states that a challenge for the Borough '*must be to provide more large houses in the better areas of Barnsley MB to retain, and also attract, mid-upper income households.*'
- 4.18 The SHMA also states that executive housing provision will have a role in responding to "*the need for diversification and expansion of the sub-regional economy and in contributing towards achieving wider population and economic growth objectives for the Region*".

- 4.19 The SHMA identifies that *“none of the developers consulted were currently developing executive housing in Barnsley citing the tough market conditions, access to finance/mortgages and general economic climate as the main reasons”*. Finally, the SHMA states that it was felt by the developers consulted that any significant development of executive housing in Barnsley would need to coincide with an improvement in the local economy.
- 4.20 The SHMA states that there is a short fall of all property types in the Borough, including in detached executive 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.
- 4.21 Further evidence of the need to increase the provision of executive family homes in the Borough is set out within a cabinet report of BMBC’s Executive Director of Development Environment and Culture, dated 4th July 2012 Ref.CAB.4.6.2012/8 in which BMBC identify a need for low density dwellings in the top bracket of the housing market and confirm an aspiration to deliver 1200 low density high value dwellings. Importantly, BMBC also recognise in this report the need to provide a mix of executive housing in differing price brackets, in order to take account of the need for a range of executive housing to cater for those in managerial positions of differing levels. Despite this recognition, and repeated reference to it in submissions throughout the Development Plan Process by YLL, it is apparent that BMBC have not currently sought to address these matters as part of its Local Plan and the associated housing site identification process.
- 4.22 The provision of new build executive homes will therefore not only help to retain the Borough’s current population of those in senior managerial roles, but also attract those from neighbouring authority areas as well. However, the evidence presented above warns that the delivery of executive homes should be focused in areas of the Borough where those seeking such executive homes wish to live. Finally, in reference to selling prices, we believe that the Borough has an opportunity to steal a march on its competition of neighbouring authority areas due to lower selling prices. It is evident that if development proposals for the right type, quality and size of properties were granted planning permission by BMBC in the Borough’s most attractive market locations, then supply would rise to meet the demand and consequently, the identified executive housing needs of the Borough would start to be met.
- 4.23 All of the evidence highlighted above clearly points to a need for more executive housing in order to stem the flow of higher income households out of the Borough in search of larger properties, and also to attract the higher income population into Barnsley. The level of executive housing currently being developed in the Borough falls a long way short of achieving these aims.

- 4.24 The delivery of detached/executive family homes comes hand in hand with the identification of housing sites in areas of strong housing demand. Simply put, developers will not wish to deliver a product in an area where it won't sell.
- 4.25 Whilst we acknowledge and support BMBC's aim of seeking to encourage development in areas of low demand in order to deliver regeneration benefits, in order for this approach to work it should be taken in combination with ensuring that the right amount and type of housing is also delivered in the stronger housing market areas of the Borough.
- 4.26 Such an approach is essential if BMBC are to ensure the delivery of the Borough's identified housing requirements which will demand the need to deliver between 30 and 40 individual housing outlets a year. On the basis of the sites identified in the BLPP we are concerned that insufficient demand will be generated by developers to ensure the delivery of the required number of housing outlets per year.
- 4.27 Accordingly, sustainable, available and deliverable sites which have identified developer interest should be given substantial weight by BMBC in the determination of housing allocations. Sites such as this at Hunningley Lane, which has interest from four national house builders including Persimmon homes, Avant homes, Bellway homes and Barratt Homes and David Wilson Homes. The same cannot be said for a significant proportion of the currently proposed housing allocations of the BLPP.

Meeting Barnsley's Quantitative House Needs

- 4.28 Linked to the need to deliver the "qualitative" housing needs of the Borough is the requirement to also ensure that the "quantitative" housing needs are met through the identification of deliverable housing allocations.
- 4.29 Accordingly, In July 2016 PB Planning undertook an assessment of the deliverability of all proposed housing allocations in the BLPP of circa 100+ homes in size. The assessment was undertaken in accordance with national planning guidance in respect of assessing suitability, availability and achievability.
- 4.30 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.

- 4.31 Footnotes 11 and 12 of paragraph 47 of the NPPF provide the definition of “*deliverable*” and “*developable*” residential development sites.
- 4.32 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.*”
- 4.33 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.
- 4.34 The following evidence was taken into account in our assessment: -
- Site Visit - undertaken on 3rd June 2016
 - Barnsley UDP
 - 2013 BMBC SHLAA
 - 2016 BMBC SHELAA
 - BMBC’s 2016 Site Assessments of the proposed allocations
 - BMBC’s Ecological Assessment
 - Planning History Search
 - Discussions with Developers
 - Knowledge of the market and viability matters.
- 4.35 The assessment is enclosed in Appendix 8 and provides the following conclusions in respect of the ability of the proposed housing allocations to meet the quantitative housing needs of the Borough: -

Area	BMBC Total	PBP Total	Difference
Urban Barnsley	6,080	4,001	-2,079
Royston	770	740	-30
Goldthorpe (Dearne Towns)	1,852	694	-1,158
Cudworth	966	709	-257
Wombwell	1,248	1075	-173
Hoyland	1,663	1,195	-468
Penistone	786	756	-30
Total	13,365	9,170	-4,195

- 4.36 We believe it is important to reiterate that the majority of evidence used in our assessment to analyse the deliverability of the proposed allocations reviewed was provided by/obtained from BMBC's own evidence base.
- 4.37 On the basis of the above BMBC need to allocate additional sites in every settlement area in order to meet the current housing distribution figures presented in Policy H2 of the BLPP. As you will note, Urban Barnsley (which is the main focus for growth in the Borough) experiences the biggest reduction in numbers, this is associated with the very large allocations in Urban Barnsley (Sites Reference MU1 and AC12) not being able to deliver the number of homes anticipated across the BLPP's timescales to 2033 (this is discussed further below). The Dearne Towns have the second biggest reduction on account of recognised low housing demand and weak and at times failing housing markets, resulting in serious viability implications, an issue we referenced above in relation to meeting the qualitative housing needs of the Borough.
- 4.38 Accordingly, our assessment provides both qualitative and quantitative reasoning for BMBC to identify additional housing allocations which have identified developer interest either in place of or in addition to those currently proposed.
- 4.39 One particular concern we identify in our assessment is associated with the large size of some of the proposed allocations and whether they can realistically deliver the number of homes identified within the Local Plan period to 2033. This concern was specifically associated with individual sites such as 'MU1' and where a number of large sites would need to be grouped together in annual build out rates and selling outlet terms given their location adjoining/adjacent to each other, such as sites as AC12, AC11 & H44 in Urban Barnsley and sites H45, H7, H8 & AC31 in Hoyland. With regards to the grouped sites referenced above there are also a number of other serious technical/viability constraints identified within our assessment, which may preclude their delivery, at least in the early years of the Barnsley Local Plan.
- 4.40 Enclosed with this document is recent research undertaken by Savills, published in October 2014 (Appendix 8), which identifies the average lead in times and annual delivery rates associated with sites of over 500 homes in size. The report identifies that on average, across all of the sites analysed, construction on the first phase of housing started more than four years after the submission of an outline application. With regards to annual delivery rates, the analysis indicated that once construction starts, and in a strong market area, annual delivery can be anticipated to be around 60 units in the first year of construction, picking up to more than 100 units per annum in subsequent years and increasing to around 120 units.

- 4.41 Accordingly, on the basis of the evidence provided within the Savills report, in the context of the Barnsley Local Plan this suggests that the proposed housing allocations of over 500 homes in size won't start to deliver new homes until at least 2021/2022, based on four years post the adoption of the Local Plan in 2018 and the subsequent submissions of outline planning applications. Over the remaining 12-year period the development will then provide outline planning applications. Over the remaining 12-year period the development will then provide 60 homes in the first year; 100 homes for the proceeding 5-years; and 120 homes maximum over the remaining 6 years of the plan. A total of circa **1,200 homes** up to the end of the Local Plan Period in 2033. This would equate to a 500 dwelling deficit at site MU1 alone (which has a proposed capacity of 1,700 homes).
- 4.42 With reference to the Savills research, such delivery rates are based on schemes in strong market areas and it could be concluded that these sites are not located in a comparably strong market area and thus that the assumed delivery rates could be lower than anticipated, resulting in a further increase in the deficits identified in our enclosed assessment.
- 4.43 A further point of concern identified by the assessment was the number of large allocations identified predominantly within the east of the Borough. A number of which are located within the same principle town area. As identified above sites of circa 500 homes in size will require two to three housebuilders developing the site at the same time. As the number of housebuilders willing to deliver homes in the weaker eastern market areas of Barnsley is limited, we are concerned that there will simply be too many large sites in these locations to attract the number of housebuilders needed to deliver the annual number of homes required from these sites in order to meet the BLPP's dwelling targets.
- 4.44 The above issue also leads onto a further concern in relation to the proposed densities of the housing allocations. Paragraph 9.5 of the BLPP identifies that proposed housing allocations *"have been assessed at an indicative density of 40 dwellings per hectare. The site areas quoted are gross.* We have significant concerns associated with the Council's proposed densities. Particularly given that the 40 dwellings per hectare calculation is associated with gross densities.

As identified above, it is our view that the proposed housing allocations will not deliver the number of homes needed. The assessment we undertook also considers the proposed densities of the allocations and identifies where we believe the 2013 SHLAA densities/capacities are more appropriate and should be utilised.

- 4.45 We do however appreciate that BMBC will have utilised more up to date, robust, information to identify the capacity of the proposed housing allocations where this is available. PB Planning are directly involved in two new housing schemes where a revised dwelling quantum has now been identified in the BLPP to that which was prescribed in the previous Draft Barnsley Local Plan, these being at YLL's draft Barnsley Local Plan Housing site allocation at Land to the

South of Halifax Road, Penistone (Ref.H82) and a Barratt Homes site at Carrs Lane, Cudworth (Ref. H32).

- 4.46 With regards to YLL's site South of Halifax Road, Penistone (Ref.H82), the site was previously for 516 homes, however, this figure that has now been revised to 414 homes in the BLPP. However, Barratt Homes & David Wilson Homes have recently prepared a detailed layout for the site proposing a development of 394 homes at a gross density of 23dph and a maximum net achievable density of 35dph at 15,302.9sq. ft. to the acre of coverage.
- 4.47 In respect of the Carrs Lane, Cudworth site (Ref.H32), the site was previously for 333 homes, a figure that is revised to 278 homes in the BLPP. This is on account of Barratt Homes' current planning application which seeks the delivery of 278 homes on the site at a gross density of 24dph and a net density of 35dph at 13,845sq. ft. to the acre of coverage. Importantly, the level of homes proposed within the application was reduced from 316 homes at the request of the Council's planning and design officers, ward members and local residents.
- 4.48 It is our view that the Council should seek to review the proposed housing allocations on the basis of a 30dph gross density, which is still a higher rate than those proposed within the two examples given above.
- 4.49 Prior to a review of all of the proposed housing allocations, it could be argued that the Council will need to reduce the capacity of all existing proposed allocations by up to 25% in order to reflect more appropriate densities. If not, then the proposed allocations will simply not deliver sufficient housing to satisfy the Council's objectively assessed housing needs for both market and affordable homes. As identified above, our assessment of the proposed housing allocations sets out where we believe the densities provided in the 2013 SHLAA are more appropriate and should be utilised. We request that BMBC fully consider the results of our deliverability assessment for the proposed housing allocations whilst undertaking its review.
- 4.50 In conclusion we believe there is robust evidence to demonstrate that additional housing sites need to be identified in the Borough's stronger housing market locations in order to ensure the livery of both the qualitative and quantitative housing needs of the Borough which are clearly established by BMBC's own adopted economic and housing strategies.
- 4.51 BMBC are aware that YLL have consulted with Leading Counsel Sasha White QC in respect of the evidence provided above in relation to meeting the evidenced housing needs of the Borough. Sasha White QC's Legal Opinion is enclosed with these representations (Appendix 1). The key points raised by Sasha White QC in respect of the evidence presented in this section of the representations is as follows: -

- **Para 44 - In my view the Council clearly must ensure that the BLP is consistent with the Housing Strategy, which identifies a need for c. 2500 larger family/higher value homes in the plan period. Whilst it would not be necessary for the BLP to include a policy requirement to deliver this number of houses, it clearly should be demonstrated that the housing policies of the BLP will deliver this element of the Housing Strategy. The evidence referred to in my instructions would seem to suggest that there is a real risk that this element of the housing needs of the area will not be met through the proposed allocations, because of their inability to deliver such high value housing.**
- **Para 45 - In those circumstances, in my opinion there is a good case for the Council reviewing whether the proposed housing allocations are able to deliver the identified requirement of c. 2500 larger family/higher value homes. If they cannot deliver that requirement, then there is plainly a case for allocating additional or alternative sites which can meet those requirements.**
- **Para 46 - The Council appear to proceed on two assumptions about housing delivery upon which YLL and others have cast considerable doubt. First, the Council's assumption about the density of new housing sites arguably does not recognise the need described above to provide larger homes.... Second, a number of the Council's proposed allocations lie in poorer performing housing areas, where there are doubts about deliverability, build-out rates and the ability of the sites to meet market demand. It is clear that a sound plan must provide housing in the areas in which the housing demand arises. Both of these assumptions call into question the soundness of the BLP as drafted.**
- **Para 48 - In my opinion there is doubt as to whether the BLP can be considered sound in terms of its ability to meet the area's housing needs both quantitatively and qualitatively. The information provided in my instructions confirms that both YLL sites are capable of delivering larger family homes at an early stage of the plan process, contributing to meeting the apparent qualitative and quantitative deficiencies in the BLP as drafted.**

Hunningley Lane, Worsbrough Dale

- 4.52 We believe that the development of the proposed 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. It can deliver circa 329 homes of which 33 would be affordable at a gross density of 28 dwellings per hectare.
- 4.53 Whilst development of the site will meet the sustainable development and deliverability policies of the National Planning Policy Framework, given the site's location in Urban Barnsley it is also important to place great weight on the very real and important fact that there are a number of national house builders (Persimmon, Avant, Bellway and Barratt & David Wilson Homes) who have documented an aspiration to deliver new homes on this site as soon as possible. Indeed, Persimmon homes has demonstrated a firm interest in the site having already produced a draft layout and indicated its desire to acquire and develop the site at the earliest opportunity, if allocated. 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 in respect of the identification of suitable, available and achievable housing allocations within the emerging Barnsley Local Plan.

- 4.54 We believe that 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 BLPP. 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.

5.0 SAFEGUARDED LAND

- 5.1 YLL objects to the evidence base associated with the identification of the proposed Safeguarded Land sites, the proposed quantum of safeguarded land and the wording of Policy GB6.
- 5.2 With regards to the policy's evidence base, as stated above we have concerns over the soundness of the Green Belt Review on the grounds that there is no robust, up to date, assessment of the proposed Safeguarded Land designations for future development. It is clear from our review of a number of the Safeguarded Land sites that there are a number of deliverability concerns associated with them. Particularly those located in Penistone and the adjacent Villages. Land which is Safeguarded for development clearly needs to be deliverable for its proposed future development. Otherwise its allocation would be unsound and not justified.
- 5.3 In respect of the quantum of safeguarded land, Paragraph 85 of the Framework identifies that where necessary the need to plan for longer term development needs "*stretching well beyond the plan period*" through the designation of Safeguarded Land. There are varying examples within recently approved Development Plan documents of what a timescale of "*well beyond the plan period*" can equate to which differ between an additional 10% of land allocations; an additional 5 years' worth of land; or in some cases 10 years' worth of land. It could be argued the greater amount the greater permanence can be provided to the Green Belt.
- 5.4 The BLPP identifies 201.5 hectares of Safeguarded Land. Using a more appropriate gross density calculation of 30 dwellings per hectare, the proposed Safeguarded Land designations would deliver circa 6,000 homes. Which is greater than a five-year supply based on an annual housing land requirement of 1,100 homes per annum. However, as identified in Section 4 above there is a case for an increase of the annual dwelling requirement based on the latest population projections and predicted job growth. In addition, there is also the case that a number of the proposed safeguarded land designations would then be needed to deliver any shortfall in housing land allocations as a result of an increase in the annual housing requirements, but also on account of a number of the existing housing allocations being considered undeliverable. In this respect, we have a number of serious concerns associated with the deliverability and suitability of the proposed designated Safeguarded Land sites, resulting in the argument that BMBC will need to identify additional Safeguarded Land sites to those proposed even if the proposed quantum of 5 years is found sound.
- 5.5 Notwithstanding the above, YLL do object to the proposed quantum of Safeguarded Land and consider that a more robust target of at least 10 years beyond the identified plan period (to 2043) should be identified. Especially when the timescales between the adoption of the Barnsley

UDP (December 2000) and the proposed adoption date of the new Barnsley Local Plan are considered.

- 5.6 With regard to the specific wording of the policy, our client **objects** to the lack of reference in Policy GB6 in reference to potential trigger points for the release of safeguarded land and a review of the Local Plan. Such trigger points usually relate to the inability to demonstrate a 5-year supply of deliverable housing land to meet the identified housing needs of the District which would put pressure on the need to release the Safeguarded Land sites to meet these needs. Thus also triggering a need to undertake a partial or full review of the Local Plan accordingly. YLL therefore believe that in order for the policy to align with national planning guidance, Policy GB6 should be amended to include reference to the justification text provided within Paragraph 18.22 of the BLPP where it states that: -

“Safeguarded land can only be released in exceptional circumstances which may include a lack of five-year land supply or a local need. Where there is a local need a safeguarded land site may be considered, for example, through a neighbourhood plan.”

- 5.7 Without the provision of the above mechanisms within the proposed policy it is clear that the Council would be placed in a position where they would potentially not be able to flexibly respond to the Borough's housing needs until a replacement Local Plan is adopted. Which is of course a process which would take a number of years. In the BLPP, Safeguarded Land should be designated on account of its deliverability as a potential development site, and not due to the “*open nature of the land*”. Accordingly, YLL request that the policy is amended as suggested above and also that the reference to the need to ‘protect the open nature of the land’ is removed.

6.0 SUMMARY & CONCLUSIONS

6.1 When either considered together or individually we believe that the areas of identified concern raised within these representations provide a compelling case for amendments to be made to the emerging Barnsley Local Plan to enable the release of our client's sites at Hunningley Lane from the Green Belt and its allocation for residential use in order to help satisfy the adopted housing and economic strategies of BMBC.

6.2 To re-iterate the three areas of concern presented within the introduction, we consider the required amendments to relate to the following: -

- The (lack of) robustness of the Green Belt Review on account of its assessment not including existing safeguarded sites and the disregarding of Arup's key comments and conclusions associated with the further review of suggested sub-divisions of assessed areas;
- The proposed distribution of growth and housing allocations will not deliver the number and type of new homes required to meet BMBC's own housing needs aspirations set out within the BMBC Economic and Housing strategies; &
- The evidence base associated with the identification of the proposed Safeguarded Land sites, the proposed quantum of safeguarded land and the wording of Policy GB6 are unsound and will not deliver long term Green Belt permanence.

6.3 Accordingly, we believe that changes should be made to the BLPP to include YLL's Hunningley Lane site as a housing allocation, followed by a further round of consultation, prior to the submission of the document to the Secretary of State. At the same time BMBC would also have the opportunity to remedy the identified lack of robustness and inaccuracies associated with the current evidence base.

6.4 Should the amendments requested by these representations not be made we would have strong concerns over the ability of a Government appointed Inspector to consider the Barnsley Local Plan sound in its current form. A conclusion shared by Sasha White QC where he stated in Paragraph 53 of his enclosed Legal Opinion that: -

"On the basis of the information before me and my consideration of the evidence supporting the BLP, I consider that there is a real risk of the BLP as drafted not being found to be sound in the process of the examination. Such a finding would be likely to result in substantial delay to adoption, as is clearly evidenced from the experience in other authorities (see e.g. the plan processes in Cheshire East and Medway, to name just two). There is an opportunity at this stage to make changes to the BLP to address the deficiencies identified above in respect of the Green Belt review and housing numbers so far as these matters impinge on YLL's sites. If that opportunity is missed, the same points are likely to be raised during the examination by Counsel and will have a strong prospect of persuading the Inspector that adoption cannot be recommended."

6.5 Whilst Sasha White QC's Legal Opinion was based on the previous version of the Draft Barnsley Local Plan (published November 2014) it is clear that the required amendments

needed to render the document sound have not been made to the BLPP prior to its publication and therefore remains up to date and relevant for consideration.

BMBC Allocations Deliverability Assessment

Urban Barnsley						
Site Reference	Site Address	Indicative Number of Dwellings	BMBC Deliverability Comments	PBP Deliverability Comments	PBP Conclusion	PBP Yield in Plan Period
UB6	Zenith Business Park extension	182	<p>Barnsley UDP – Urban Greenspace Proposal</p> <p>2013 SHLAA - No SHLAA assessment is available.</p> <p>2016 SHEELA – Site Ref. 991 – 143 Homes - Years 5-10 Some new access infrastructure required Extensive new drainage infrastructure required Site has bad neighbours with potential for mitigation No information on availability, but thought likely to be in private and/or multiple ownership.</p> <p>BMBC 2016 Site Assessments On a greenspace where its loss would result in deficiency:</p> <p>Planning History - No recent relevant planning applications</p>	<ul style="list-style-type: none"> • Large Pylons Crossing Site. • Amenity Issues due to access through an employment area. • Potential amenity issues associated with industrial uses to the west of the site. • Is access available from a landownership point of view. • 	No evidence has been presented by BMBC that the constraints identified by them and PBP are resolvable. Including the loss of urban greenspace. Notwithstanding this position it is considered that some housing development can be provided on the site over the course of the plan period. Due to the location of the pylons the capacity of the site should be reduced accordingly.	100 Dwellings
H20	Site south of Bloomhouse Lane, Darton	209	<p>Barnsley UDP – Safeguarded Land</p> <p>2013 SHLAA Ref. 266 – Category 2 - 194 Homes at 35dph Site faces some suitability constraints Site performs well against availability criteria Site performs well against achievability criteria Some Access constraints identified by Highways Authority Minor Drainage Constraints Identified Ground Treatment expected to be required on part of the site. Housing in a location likely to be moderately attractive to the market. Site is within 200 metres to 800 metres of an AQMA.</p> <p>2016 SHELAA – 237 Homes – Years 0-5 Site within an area likely to contain geological constraints of mining cavities.</p> <p>BMBC 2016 Site Assessments On a greenspace where its loss would result in deficiency</p> <p>Planning History - No recent relevant planning applications</p>	<ul style="list-style-type: none"> • We are aware that very large mining cavities exist at this site and in addition, that a part of it was also used as landfill. Has this been assessed and are there no contamination issues or achievability issues re viability. • Impact of remediation on delivery rates. • If the site is deliverable, then why hasn't the site come forward for development yet given its UDP allocation? 	No evidence has been presented by BMBC that the constraints identified by them and PBP are viably resolvable. Notwithstanding this position it is considered that some housing development can be provided on the site over the course of the plan period. Identified site constraints will have an impact on the site's capacity, especially when mitigation is taken in account. Density reduced to 30dph accordingly.	160 Dwellings
H53	Site north of Wilthorpe Road	301	<p>Barnsley UDP – Urban Greenspace</p> <p>2013 SHLAA – Ref. 383 – Category 2 - 197 homes at 25 dph Site faces some suitability constraints Site performs well against availability criteria Site face some achievability constraints Some Access Constraints Identified by Highways Authority Major Drainage Constraints Identified Ground Treatment expected to be required on part of the site Housing in a location likely to be moderately attractive to the market. Site has bad neighbours with potential for mitigation Moderate Achievability - Cannot be used in the first 5-year land supply.</p>	<ul style="list-style-type: none"> • Site has planning permission – are the numbers included in the BLPP's initial dwelling distribution table set out in Policy H2? 	None. Site has planning permission and is currently being developed.	301 Dwellings

			BMBC 2016 Site Assessments Extensive new drainage infrastructure required Planning History - Full Planning Application (Ref. 2014/0474) for 301 homes approved in 2015. Persimmon site currently being developed.			
H14	Site west of Wakefield Road	135	Barnsley UDP – Safeguarded Land 2013 SHLAA – Ref.251 – Category 1 – 289 homes as 35dph Site performs well against suitability, availability and achievability criteria. Some Access Constraints Identified by Highways Authority. Major Drainage Constraints Identified. Housing in a location likely to be moderately attractive to the market. 2016 SHELAA – Site within area likely to contain geological constraints of mining cavities. BMBC 2016 Site Assessments Extensive new drainage infrastructure required. Planning History - Application for approval of reserved matters Ref. 2016/0337 of 46 dwellings associated with outline planning permission 2014/0249 which was for up to 250 dwellings approved in 2016.	<ul style="list-style-type: none"> Site has planning permission – numbers included in initial dwelling distribution table in the Draft Local Plan? Issues associated with pylons located across the site. 	On account of the site's planning permission we believe that BMBC's figure of 135 homes should be used as we consider that this figure has acknowledged the concerns associated with pylons crossing the site.	135 Dwellings
AC1	Former Woolley Colliery	86	Barnsley UDP – Green Belt 2013 SHLAA – Ref.667 – Category 2 – 47 homes at 25dph Site faces some suitability constraints. Site performs well against availability criteria. Site face some achievability constraints. Minor Drainage Constraints Identified. Ground treatment expected to be required on part of the site. Housing in a location likely to be moderately attractive to the market. Site within 200 metres to 800 metres of an AQMA. Moderate Achievability - Cannot be used in the first 5-year land supply. 2016 SHELAA – Site has bad neighbours with potential for mitigation Site within area likely to contain geological constraints of mining cavities. Planning History - No recent relevant planning applications.	<ul style="list-style-type: none"> No comments. 	No evidence has been presented by BMBC that the constraints identified by them are resolvable. Notwithstanding this position it is considered that some housing development can be provided on the site over the course of the plan period. If BMBC are to retain the site within the Local Plan, then the SHLAA figure should be considered the most appropriate.	47 dwellings based on SHLAA.
AC3	Former William Freeman site, Wakefield Road	131	Barnsley UDP – Employment Site 2013 SHLAA – Ref.202 – Category 3 – 47 homes at 35 dph Site faces significant suitability constraints. Site performs well against availability criteria. Site performs well against achievability criteria. Some access constraints identified by the Highways Authority. Major Drainage constraints identified. Ground treatment expected to be required on the majority of the site. Housing in a location likely to be moderately attractive to the market. Site has bad neighbours with no potential for mitigation. SHELAA 2016 –	<ul style="list-style-type: none"> Pylons crossing edge of the site. Potential issues associated with density as this is a location more attributable to a 30pdh to 35pdh net housing development Has sufficient evidence been provided to identify that the site is no longer viable or required for employment use? If the site is deliverable, then why hasn't the site come forward for development since 2009 when a planning application (reference 2009/1076) was submitted (and subsequently withdrawn) for 83 dwellings and various industrial units. 	No evidence has been presented by BMBC that the constraints identified by them and PBP are resolvable. No planning activity has taken place since 2009 and thus we would consider this to be evidence that the site's constraints cannot be overcome.	0 Dwellings

			<p>Site within area likely to contain geological constraints of mining cavities. No information on availability, but thought likely to be in private and/or multiple ownership</p> <p>BMBC 2016 Site Assessments Extensive new drainage infrastructure required. Extensive new access infrastructure required. Site within area likely to contain geological constraints or mining cavities.</p> <p>Planning History - Outline Application Ref. 2009/1076 for 83no. residential dwellings and industrial units use class B1, B2 and B8 was withdrawn in 2009.</p>			
MU1	Land South of Barugh Green Road	1700	<p>Barnsley UDP – Green Belt</p> <p>2013 SHLAA – Ref.215 – Category 2 – 764 homes at 25dph Site faces some suitability constraints. Site performs well against availability criteria. Site face some achievability constraints. Some Access constraints identified by Highways Authority. Minor Drainage Constraints Identified. Ground Treatment expected to be required on part of the Site. Site is within 200 metres of an AQMA. Moderate Achievability - Cannot be used within the first 5-year land supply.</p> <p>2016 SHELAA – Site within area likely to contain geological constraints of mining cavities. No availability information, but thought likely to be in private and/or multiple ownership.</p> <p>Planning History - No recent relevant planning applications.</p>	<ul style="list-style-type: none"> • Huge initial infrastructure requirements. • Former mining area, including bell pits. Has remediation been factored into viability matters & deliverability timescales. • A link road to provide easy access to and from the M1 is proposed nearby junction 37 - Is this link road needed in the first instance. If so, is the funding in place to deliver the required infrastructure upon the commencement of development? • Due to anticipated lead in times (infrastructure) and annual delivery rates it is considered that the site won't deliver homes for the first 5 years of development and then will deliver circa 120 homes per year maximum over the remaining plan period. • Understood that there is developer interest in the site. Not multiple developers though. 	No evidence has been presented by BMBC that the constraints identified by them and the delivery constraints identified by PBP are viably resolvable. As PBP understand that there is developer interest, it is considered that housing development could commence circa 5 years from the adoption of the plan. The maximum number of homes to be delivered each year will be circa 120 homes, if 3 selling outlets are present. There is concern that this won't be the case, however, this figure has been included in the assessment in order to provide an optimistic outlook.	1,200 Dwellings
H83	Land to the east of Woolley Colliery Road	89	<p>Barnsley UDP – Green Belt</p> <p>2013 SHLAA – Ref. 207 – Category 1 - 91 homes at 35dph Site performs well against suitability, availability and achievability criteria. Minor Drainage Constraints Identified. Site is within 200 metres to 800 metres of an AQMA.</p> <p>2016 SHELAA – Some new access infrastructure required No availability information, but thought likely to be in private and/or multiple ownership.</p> <p>Planning History - No recent relevant planning applications.</p>	<ul style="list-style-type: none"> • We are aware that very large mining cavities exist beneath the adjoining site (reference H20) and therefore consider it reasonable to believe that they exist beneath this site also. • Impact of remediation on delivery rates. 	No evidence has been presented by BMBC that the constraints identified by them and PBP are viably resolvable. Notwithstanding this position it is considered that some housing development can be provided on the site over the course of the plan period.	89 Dwellings
AC12	Land off Shaw Lane Carlton	1206	<p>Barnsley UDP – Green Belt; Safeguarded Land; Employment Policy Area & Urban Greenspace.</p> <p>2013 SHLAA – Ref.258/454/490 – Category 3 – 935 homes at 35dph Site faces significant suitability constraints Site performs well against availability criteria Site face significant achievability constraints Major constraints identified by County Council Highways Authority Minor drainage constraints identified Treatment expected to be required on part of the site Site has bad neighbours with no potential for mitigation Poor Achievability - Cannot be used in the first ten years' land supply</p>	<ul style="list-style-type: none"> • Site reference AC 12 is the site of the former 'Carlton Main Colliery'. Historical maps also illustrate that there were a number of quarries and landfill in the vicinity thus remediation needs to be factored into viability matters and delivery timescales. • A site of this size and in this location requires strong developer interest from the outset in order for BMBC to be sure that the site is deliverable in respect of viability/infrastructure requirements. • Availability concerns. • Furthermore, due to the site's size, should developer interest be evident then BMBC need to factor in a sufficient lead in time to the delivery of homes on the site for the provision of significant infrastructure. The site will not potentially deliver homes for the first 5 years of the plan and this needs to be considered. • Evidence also needs to be provided to justify the availability of the site given the potential for multiple ownerships. 	No evidence has been presented by BMBC that the constraints identified by them and PBP are viably resolvable. BMBC's own SHLAA assessment identifies that the site is a Category 3 site due to the level of constraints associated with the site's deliverability. When this is also factored into the uncertainty over the site's availability and the lack of developer interest then it becomes clear that the site is	600 Dwellings in final 5 years of the plan period.

			<p>2016 SHELAA – All Site References Extensive new access infrastructure required Extensive new drainage infrastructure required Treatment/remediation expected to be required Site has bad neighbours with potential for mitigation Site within area likely to contain geological constraints of mining cavities No availability information, but thought likely to be in private and/or multiple ownership 10 Years+ for the majority to come forward.</p> <p>BMBC 2016 Site Assessments Site is significantly detached from existing settlement area</p> <p>Planning History - No recent relevant planning applications.</p>	<ul style="list-style-type: none"> • • Food factory operated by premier foods is located within the central area of the site, has this been factored in to a masterplan? • Site should also be considered as part of Sites AC11 & H44 in respect of build rates due to proximity of sites AC11 & H44 i.e. there will be no more than three selling outlets on sites AC12, AC11 & H44 at the same time in order to limit competition. • Large southern part of the site allocated as urban Greenspace in the Barnsley UDP and includes part of the Historical Barnsley Canal route and identified Green ways. • Part of the site adjacent to the factory is allocated for the 'expansion of an existing firm' (employment purposes) within the Barnsley UDP • 	<p>simply not deliverable. If the site does come forward it will optimistically be in years 10+ of the local plan period on account of the constraints identified, but also as the adjacent housing allocation (reference H44) will likely be delivered first on account of it being a more deliverable housing prospect.</p>	
AC11	Land between Fish Dam Lane and Carlton Road	294	<p>Barnsley UDP – Urban Land to Remain Undeveloped & Housing Proposal</p> <p>2013 SHLAA – Ref.226/227/343/410 – Category 2 – 180 homes at 25dph</p> <p>Site faces some suitability constraints Site performs well against availability criteria Site performs well against achievability criteria Major constraints identified by County Council Highways Authority Minor drainage constraints identified</p> <p>2016 SHELAA – All site references Site within area likely to contain geological constraints of mining cavities. No availability information, but thought likely to be in private and/or multiple ownership.</p> <p>BMBC 2016 Site Assessments Site is within a conservation area. On a greenspace where its loss would result in deficiency. Site is marginally viable i.e. it neither generates a positive or negative residual value. Or site is unviable and generates a negative residual value.</p> <p>Planning History - No recent relevant planning applications.</p>	<ul style="list-style-type: none"> • A site of this size and in this location requires strong developer interest from the outset in order for BMBC to be sure that the site is deliverable in respect of viability/infrastructure requirements. • Furthermore, due to the site's size, should developer interest be evident then BMBC need to factor in a sufficient lead in time to the delivery of homes on the site for the provision of significant infrastructure. • Evidence also needs to be provided to justify the availability of the site given the potential for multiple ownerships. • Considering that part of this site is allocated as a housing proposal within the UDP, why hasn't it come forward for development to date (approximately 16 years)? • Site should also be considered as part of Site AC12 & H44 in respect of build rates due to proximity of sites AC12 & H44 i.e. there will be no more than three selling outlets on sites AC12, AC11 & H44 at the same time in order to limit competition. • Former significant mining uses nearby (Carlton Main Colliery). With the potential for mining cavities to be present, remediation needs to be factored into viability matters and delivery timescales 	<p>No evidence has been presented by BMBC that the constraints identified by them and PBP are viably resolvable. BMBC's own assessments identify that the site has significant physical constraints to overcome, that the site may not be viable and that the site's availability is unknown. When these factors are considered against the site's UDP allocations and the fact that the submission of a planning application for residential development would have been acceptable in principle on parts of the site in the past, it is clear that the site simply is not a deliverable residential development site. Unless further evidence is provided to overcome these concerns then the site should not be included as a housing allocation in the Local Plan.</p>	0 Dwellings.
H44	Land to the north of West Green Way, West Green	477	<p>Barnsley UDP – Safeguarded Land & Employment Policy Area</p> <p>2013 SHLAA – Ref.325 - Category 3 – 492 homes at 35dph Site faces significant suitability constraints Site performs well against availability criteria Site face some achievability constraints Major Drainage Constraints identified Site has bad neighbours with potential for mitigation Moderate Achievability - Cannot be used in the first 5-year land supply.</p> <p>2016 SHELAA – Site within area likely to contain geological constraints of mining cavities</p> <p>Planning History - No recent relevant planning applications.</p>	<ul style="list-style-type: none"> • A site of this size and in this location requires strong developer interest from the outset in order for BMBC to be sure that the site is deliverable in respect of viability/infrastructure requirements. • Furthermore, due to the site's size, should developer interest be evident (which we don't believe it is) then BMBC need to factor in a sufficient lead in time to the delivery of homes on the site for the provision of significant infrastructure. • Site should also be considered as part of Site AC12 in respect of build rates due to proximity of sites AC12 & AC11 i.e. there will be no more than three selling outlets on sites AC12, AC11 & H44 at the same time in order to limit competition. • This site lies adjacent to the site of the former 'Carlton Main Colliery' and historical maps indicate that there was a landfill tip on site (a part of this is also located on safeguarded site reference SAF1) with a number of further quarries and landfill in the vicinity. Thus remediation need to be factored into viability matters and delivery timescales 	<p>No evidence has been presented by BMBC that the constraints identified by them and PBP are viably resolvable. BMBC's own SHLAA assessment identifies that the site is a Category 3 site due to the level of constraints associated with the site's deliverability. Notwithstanding this position it is considered that some housing development can be provided on the site over the course of the plan period. When considered alongside Site AC12 it is considered that the site could deliver new homes in the 5-10-year period of the Local Plan. With site AC12 following on from this</p>	477 homes in years 5-10 of the plan period

					site. Therefore, a rate of 120 homes per annum for this period has been considered, optimistically, on account of the potential for 3 selling outlets on this site when considered alongside site AC12 holistically.	
H13	Site east of Burton Road, Monk Bretton	218	<p>BUDP – Urban Land to Remain Undeveloped</p> <p>2013 SHLAA – Ref.250 – Category 2 – 238 homes at 35dph Site faces some suitability constraints Site performs well against availability criteria Site performs well against achievability criteria Major Access Constraints identified by the County Council Highways Authority Minor Drainage Constraints Identified Site is within 200 metres to 800 metres of an AQMA</p> <p>BMBC 2016 Site Assessments Extensive new access infrastructure required Owner unknown or complex multiple ownership</p> <p>Planning History - No recent relevant planning applications.</p>	<ul style="list-style-type: none"> • Potential issues associated with density as this is a location more attributable to a 30pdh to 35pdh net housing development. • Is a second access point needed on account of the size of the site? If so can this be viably delivered? The Local Plan is clear that no vehicular access shall be taken from Littleworth Lane, which limits additional access options. • The Council recognise that archaeological remains are known to be present on site. Has sufficient mitigation been provided? • Historical Maps identify that an explosives magazine and Bleach Works were located on the site. In addition, the maps also identify that the former 'Monk Bretton Colliery' was located directly adjacent. With the potential for contamination from the Bleach Works and mining cavities attributable to surrounding mining uses it is important that remediation is factored into viability matters and delivery timescales 	No evidence has been presented by BMBC that the constraints identified by them and PBP are viably resolvable. Particularly in respect of availability and mining cavities. Notwithstanding this position it is considered that some housing development can be provided on the site over the course of the plan period.	218 Dwellings
H42	Site west of Wakefield Road	246	<p>Barnsley UDP – Urban Land to Remain Undeveloped</p> <p>2013 SHLAA – Ref.267 – Category 2 – 200 homes at 35dph Site faces some suitability constraints Site performs well against availability criteria Site performs well against achievability criteria Some Constraints identified by Highways Authority Major Drainage Constraints Identified Site has bad neighbours with potential for mitigation</p> <p>2016 SHELAA – Site within area likely to contain geological constraints of mining cavities</p> <p>BMBC 2016 Site Assessments Site is significantly detached from existing settlement area Extensive new drainage infrastructure required</p> <p>Planning History - No recent relevant planning applications.</p>	<ul style="list-style-type: none"> • Historical Maps indicate extensive former mining sites immediately adjoining the site including the former 'East Gawber Hall' Colliery, 'Primrose Main' Colliery and 'Wharnccliffe Carlton' Colliery. With the potential for mining cavities to be present, it is important that remediation is factored into viability matters and delivery timescales 	No evidence has been presented by BMBC that the constraints identified by them are resolvable. Notwithstanding this position it is considered that some housing development can be provided on the site over the course of the plan period. We believe that the SHLAA capacity should be used for this site as this is a more appropriate density for the area.	200 Dwellings
H73	Land between Mount Vernon Road and Upper Sheffield Road	154	<p>Barnsley UDP – Green Belt & Urban Greenspace</p> <p>2013 SHLAA – Ref.620 – Category 2 – 321 Homes at 25dph (along with site H72) Site faces some suitability constraints Site faces some availability constraints Site face some achievability constraints Minor Drainage Constraints Identified</p> <p>2016 SHELAA – Site within area likely to contain geological constraints of mining cavities</p> <p>No availability information, but thought likely to be in private and/or multiple ownership</p> <p>BMBC 2016 Site Assessments On a greenspace where its loss would result in deficiency</p> <p>Planning History - No recent relevant planning applications.</p>	<ul style="list-style-type: none"> • We would question why only the southern portion of the site has been identified as having value as setting/ greenspace. No issues in respect of access. • Is the site available? 	No evidence has been presented by BMBC that the constraints identified by them are resolvable. (Especially in respect of why only half of the site is considered to have setting/greenspace value. Issues over the site's availability need to be addressed as well. Notwithstanding this position it is considered that some housing development can be provided on the site over the course of the plan period.	154 Dwellings

H72	Land North of Kingwell Road, Wosbrough	77	<p>Barnsley UDP – Green Belt & Urban Greenspace</p> <p>2013 SHLAA – Ref.620 – Category 2 – 321 Homes at 25dph (along with site H73) Site faces some suitability constraints Site faces some availability constraints Site face some achievability constraints Minor Drainage Constraints Identified Moderate Achievability - Cannot be used in the first 5-year land supply</p> <p>2016 SHELAA – Site within area likely to contain geological constraints of mining cavities</p> <p>No availability information, but thought likely to be in private and/or multiple ownership</p> <p>BMBC 2016 Site Assessments On a greenspace where its loss would result in deficiency</p> <p>Planning History - No recent relevant planning applications.</p>	<ul style="list-style-type: none"> Has sufficient evidence been provided to demonstrate that the site has no value as urban greenspace? Is the site available? 	No evidence has been presented by BMBC that the constraints identified by them are resolvable. Especially in respect of the loss of land which has greenspace value. Issues over the site's availability need to be addressed as well. Notwithstanding this position it is considered that some housing development can be provided on the site over the course of the plan period.	77 Dwellings
H19	Site north of Keresforth Road	231	<p>Barnsley UDP – Safeguarded Land</p> <p>2013 SHLAA – Ref.489 – Category 3 – 163 homes at 35dph Site faces significant suitability constraints Site performs well against availability criteria Site face some achievability constraints Major Constraints identified by County Council Highways Authority Minor Drainage Constraints Identified Site has Bad Neighbours with potential for mitigation Site within 200 metres of an AQMA Moderate Achievability - Cannot be used in the first 5-year land supply</p> <p>2016 SHELAA – 189 homes. Site has bad neighbours with potential for mitigation. Site within area likely to contain geological constraints of mining cavities.</p> <p>BMBC 2016 Site Assessments Extensive new access infrastructure required On a greenspace where its loss would result in deficiency</p> <p>Planning History - No recent relevant planning applications.</p>	<ul style="list-style-type: none"> Has evidence been provided to demonstrate that a suitable vehicular access can be provided. There looks to be no potential from the northern end of the site and there are topographical/arboricultural issues associated with taking access from the south of the site. Have air quality and noise assessment being undertaken to identify whether a suitable stand off from the M1 motorway can be provided. General topographical issues associated with the site's development. If the site is deliverable, then why hasn't the site come forward for development yet given its UDP designation allows this? 	No evidence has been presented by BMBC that the constraints identified by them and PBP are viably resolvable. BMBC's own SHLAA assessment identifies that the site is a Category 3 site due to the level of constraints associated with the site's deliverability. Due to serious concerns associated with the site's accessibility, until further evidence is provided to demonstrate that an access can be provided the site cannot be considered deliverable.	0 Dwellings
H18	Site east of Smithy Wood Lane	144	<p>Barnsley UDP – Safeguarded Land</p> <p>2013 SHLAA – Ref.256 – Category 2 – 118 homes at 35dph Site faces some suitability constraints Site performs well against availability criteria Site faces some achievability constraints Major Access Constraints identified by County Council Highways Authority Minor Drainage Constraints Identified Site within 200 metres to 800 metres of an AQMA Moderate Achievability - Cannot be used in the first 5-year land supply.</p> <p>2016 SHELAA –</p>	<ul style="list-style-type: none"> Ownership (willing owner)? Are there access constraints caused by ownership issues? Historical Maps indicate former 'Stafford Collieries' adjacent, thus potential remediation needs to be factored into viability matters and delivery timescales 	No evidence has been presented by BMBC that the constraints identified by them are resolvable. Notwithstanding this position it is considered that some housing development can be provided on the site over the course of the plan period. We believe that the SHLAA capacity should be used as this is a more appropriate density for the area.	118 Dwellings.

			<p>Site within an area likely to contain geological constraints of mining cavities</p> <p>BMBC 2016 Site Assessments Extensive new access infrastructure required</p> <p>Planning History - No recent relevant planning applications.</p>			
AC16	Land off Broadway, Barnsley	200	<p>Barnsley UDP – Urban Greenspace & Housing Policy Area</p> <p>2013 SHLAA – Ref.461 – Category 2 – 125 homes at 35dph Site performs well against suitability criteria Site performs well against availability criteria Site face some achievability constraints Ground treatment expected to be required on part of the site Site is within 200 metres to 800 metres of an AQMA Moderate achievability - Cannot be used in the first 5-year land supply.</p> <p>2016 SHELAA – 138 dwellings Site within an area likely to contain geological constraints of mining cavities</p> <p>BMBC 2016 Site Assessments Site within an area likely to contain geological constraints or mining cavities.</p> <p>Planning History - No recent relevant planning applications.</p>	<ul style="list-style-type: none"> Has sufficient evidence been provided to identify that the site's existing uses are no longer viable or required? If the site is deliverable, then why hasn't the site come forward for development yet given its UDP allocation allows this? Currently home to the Keresforth (medical) centre in the ownership of South West Yorkshire Partnership NHS Foundation Trust (though the land was originally in BMBC's Ownership). Is this medical centre due to be closed? If not, then the land will not be available. The allocation includes large playing fields. Has sufficient evidence been provided to demonstrate that this part of the site has no value as greenspace? 	<p>No evidence has been presented by BMBC that the constraints identified by them are resolvable. Notwithstanding this position it is considered that some housing development can be provided on the site over the course of the plan period. We believe that the SHLAA capacity should be used as this is a more appropriate density for the area.</p>	125 Dwellings
	BMBC Total	6,080 Dwellings			PBP Total	4,001 Dwellings

Royston

Site Reference	Site Address	Indicative Number of Dwellings	BMBC Deliverability Comments	PBP Deliverability Comments	PBP Conclusion	PBP Yield in Plan Period
H11	Land at Lee Lane, Royston	770	<p>Barnsley UDP – Safeguarded Land & Housing Proposal</p> <p>2013 SHLAA Site - Ref.321/473/382/244 – Category 2 & 3 – 740 homes at 35pdh Site faces significant suitability constraints. Major drainage constraints identified. Site faces some achievability constraints. Moderate achievability (cannot be used in first five years).</p> <p>2016 SHELAA – Treatment/remediation expected to be required Site within area likely to contain geological constraints of mining cavities</p> <p>Planning History - Outline Planning Application (Ref. 2013/0932) for residential development of up to 200 homes approved on north east section of site in 2014. Developer interest in the site is known.</p>	<ul style="list-style-type: none"> No deliverability concerns. Known developer interest. Large site, but subject to commencement of development in first five years of the plan and more than one developer being on site at any one time, then the numbers should be deliverable in the plan period. 	<p>No evidence has been presented by BMBC that the constraints identified by them are resolvable. Notwithstanding this position it is considered that some housing development can be provided on the site over the course of the plan period given the known developer interest. We believe that the SHLAA capacity used as this is a more appropriate density for the area.</p>	740 Dwellings
	BMBC Total	770			PBP Total	740

Goldthorpe (Dearne Towns)

Site Reference	Site Address	Indicative Number of Dwellings	BMBC Deliverability Comments	PBP Deliverability Comments	PBP Conclusion	PBP Yield in Plan Period
H1	Former Reema Estate and adjoining land off School street	525	<p>Barnsley UDP – Safeguarded Land</p> <p>SHLAA Site Ref.125 – Category 1 – 752 homes at 35pdh - Site performs well against suitability, availability and achievability criteria.</p> <p>2016 SHELAA – Some new drainage infrastructure required Treatment/remediation expected to be required</p> <p>BMBC 2016 Site Assessments Low attractiveness area. Site is marginally viable i.e. it neither generates a positive or negative residual value. Or site is unviable and generates a negative residual value.</p> <p>Planning History - Outline Planning Application (Ref. 2009/1408) for residential development approved in 2010. No reference to a Reserved Matters application being submitted which suggests that the application may now have lapsed and that no developers were previously and are currently interested in the site.</p>	<ul style="list-style-type: none"> Sections of the overall site currently in the process of being developed by Keepmoat. Has Keepmoat or any other developer confirmed interest in developing the remaining areas of the site, which are much larger than the area which it has already developed? Site has planning permission – are the numbers included in the BLPP's initial dwelling distribution table set out in Policy H2? If the site is deliverable, then why hasn't it come forward for development yet given its UDP designation allows this? 	No evidence has been presented by BMBC that the constraints identified by them are resolvable. Especially in respect of viability matters and developer interest. Notwithstanding this position it is considered that some housing development can be provided on the site over the course of the plan period given the known developer interest in the first phase of the site, where development is underway.	525 Dwellings
H84	Land to the west of Thurnscoe Bridge Lane, south of Derry Grove, Thurnscoe	308	<p>Barnsley UDP – Green Belt</p> <p>2013 SHLAA Site Ref. 183 & 498 - Category 2 – 304 homes at 35dph. Site faces some suitability constraints. Major constraints identified by County Council Highways Authority. Major drainage constraints identified. Site performs well against availability criteria Site face some achievability constraints. Moderate achievability (cannot be used in first five years).</p> <p>BMBC 2016 Site Assessments Extensive new drainage infrastructure required Low attractiveness area Site is marginally viable i.e. it neither generates a positive or negative residual value. Or site is unviable and generates a negative residual value</p> <p>Planning History - No recent relevant planning applications.</p>	<ul style="list-style-type: none"> Is there developer interest given the market location? 	No evidence has been presented by BMBC that the constraints identified by them are resolvable. Especially in respect of viability matters and developer interest. Given PBP's concerns in respect of the market area, it is considered that further evidence needs to be provided to demonstrate the site's deliverability before it can be considered a deliverable residential development site.	0 Dwellings
H30	Land north of East Street, Goldthorpe	112	<p>Barnsley UDP – Housing Policy Area; Urban Greenspace & Housing Proposal</p> <p>2013 SHLAA Site Ref. 296 – Category 2 – 137 homes at 35pdh – Site performs well against suitability criteria. Minor drainage constraints identified. Site performs well against availability criteria. Site face some achievability constraints. Moderate achievability (cannot be used in first five years).</p> <p>BMBC 2016 Site Assessments On a greenspace where its loss would result in deficiency Low attractiveness area</p>	<ul style="list-style-type: none"> Is there developer interest given the market location? Market area looks particularly poor. Severe access constraints. If the site is deliverable, then why hasn't the site come forward for development yet given its UDP allocation allows this? Historical maps indicate significant former mining site 'Hickleton Main' colliery adjacent, thus with the potential for mining cavities to be present it is important that remediation is factored into viability matters and delivery timescales. 	No evidence has been presented by BMBC that the constraints identified by them are resolvable. Especially in respect of access, viability matters and developer interest. Given PBP's concerns in respect of the market area, it is considered that further evidence needs to be provided to demonstrate the site's deliverability before it can be considered a	0 Dwellings

			Site is marginally viable i.e. it neither generates a positive or negative residual value. Or site is unviable and generates a negative residual value Planning History - No recent relevant planning applications.		deliverable residential development site.	
H51	Land north of Barnburgh Lane, Goldthorpe	109	Barnsley UDP – Safeguarded Land 2013 SHLAA Site Ref. 370 – Category 2 – 89 Homes at 35pdh - Site performs well against suitability criteria. Minor drainage constraints identified. Site performs well against availability criteria. Site face some achievability constraints. Moderate achievability (cannot be used in first five years). BMBC 2016 Site Assessments Low attractiveness area Site is marginally viable i.e. it neither generates a positive or negative residual value. Or site is unviable and generates a negative residual value. Planning History - No recent relevant planning applications.	<ul style="list-style-type: none"> Is there developer interest given the market location? Gleeson currently developing a site adjacent. Have they identified a desire to maintain development in this area? If the site is deliverable, then why hasn't the site come forward for development yet given its UDP allocation? Historical Maps indicate that the former 'Goldthorpe Colliery' is located adjacent, thus with the potential for contamination and mining cavities to be present it is important that remediation is factored into viability matters and delivery timescales 	No evidence has been presented by BMBC that the constraints identified by them are resolvable. Especially in respect of viability matters and developer interest. Given PBP's concerns in respect of the market area, it is considered that further evidence needs to be provided to demonstrate the site's deliverability before it can be considered a deliverable residential development site.	0 Dwellings
H17	Site south of Barnburgh Lane	115	Barnsley UDP – Safeguarded Land 2013 SHLAA Site Ref. 254 - Category 2 – 206 Homes at 35pdh - Site performs well against suitability criteria. Major drainage constraints identified. Site performs well against availability criteria. Site face some achievability constraints. Moderate achievability (cannot be used in first five years). The Draft allocation figure must have been reduced from 206 on account of completions. BMBC 2016 Site Assessments Extensive new drainage infrastructure required. Low attractiveness area. Site is marginally viable i.e. it neither generates a positive or negative residual value. Or site is unviable and generates a negative residual value. Planning History - No recent relevant planning applications on the western section of the site. An application for full planning permission (Ref. 2015/1198) was approved for 61 dwellings in 2016 on the eastern section of the site.	<ul style="list-style-type: none"> Gleeson currently developing the adjoining site. Have they identified a desire to maintain development in this area? Historical Maps indicate former mining and landfill uses adjacent, thus with the potential for contamination and mining cavities to be present, it is important that remediation is factored into viability matters and delivery timescales 	No evidence has been presented by BMBC that the constraints identified by them are resolvable. Especially in respect of viability matters and developer interest. Notwithstanding this position it is considered that some housing development can be provided on the site over the course of the plan period given the known developer interest in the adjacent site. This is an optimistic position which is likely to be disproved when details of developer interest are provided.	115 Dwellings
H50	Land to the north of Dearne ALC	102	Barnsley UDP – Existing Community Facility 2013 SHLAA Site Ref. 364 & 365 – Category 1 – 91 homes at 35 dph – Site performs well against suitability, availability and achievability criteria. Treatment expected to be required on part of the site. 2016 SHELAA – Some new drainage infrastructure required Site within area likely to contain geological constraints of mining cavities BMBC 2016 Site Assessments Low attractiveness area Site is marginally viable i.e. it neither generates a positive or negative residual value. Or site is unviable and generates a negative residual value. Planning History - No recent relevant planning applications.	<ul style="list-style-type: none"> Is the market area the reason why the site has not come forward to date given that the site is now developable? Is there identified developer interest? Historical Maps indicate former mining and landfill uses adjacent, thus with the potential for contamination and mining cavities to be present, it is important that remediation is factored into viability matters and delivery timescales 	No evidence has been presented by BMBC that the constraints identified by them are resolvable. Especially in respect of viability matters and developer interest. Given PBP's concerns in respect of the market area, it is considered that further evidence needs to be provided to demonstrate the site's deliverability before it can be considered a deliverable residential development site.	0 Dwellings
H12	Bolton House Farm, Barnsley Road	194	Barnsley UDP – Employment Proposal	<ul style="list-style-type: none"> No comments. 	No evidence has been presented by BMBC that the	0 Dwellings

			<p>2013 SHLAA Site Ref. 247 – Category 2 – 118 homes at 35pdh. Site performs well against suitability criteria. Minor drainage constraints identified. Treatment expected to be required on part of the site. Site performs well against availability criteria. Site face some achievability constraints. Moderate achievability (cannot be used in first five years).</p> <p>2016 SHELAA – Site has bad neighbours with potential for mitigation Site within area likely to contain geological constraints of mining cavities</p> <p>BMBC 2016 Site Assessments Low attractiveness area Site is marginally viable i.e. it neither generates a positive or negative residual value. Or site is unviable and generates a negative residual value.</p> <p>Planning History - An application for outline planning permission (Ref. 2005/1560) for employment use was withdrawn in 2005.</p>	<ul style="list-style-type: none"> • If the site is deliverable then why hasn't the site come forward for development yet given its UDP allocation, especially following the site's identification as a draft housing site allocation? 	constraints identified by them are resolvable. Especially in respect of viability matters and developer interest. Given PBP's concerns in respect of the market area, it is considered that further evidence needs to be provided to demonstrate the site's deliverability before it can be considered a deliverable residential development site.	
H67	Site to the east of Broadwater Estate	333	<p>Barnsley UDP – Safeguarded Land</p> <p>2013 SHLAA Site Ref.469 (Site half of) – Category 2 – 613 homes at 35dph – Site faces some suitability constraints. Major drainage constraints identified. Site performs well against availability criteria. Site performs well against achievability criteria</p> <p>2016 SHELAA – Site within area likely to contain geological constraints of mining cavities</p> <p>BMBC 2016 Site Assessments Extensive new drainage infrastructure required Very detrimental ecological impact On a greenspace where its loss would result in deficiency Low attractiveness area Site is marginally viable i.e. it neither generates a positive or negative residual value. Or site is unviable and generates a negative residual value.</p> <p>BMBC 2016 Housing Ecological Assessment Biodiversity Score 1</p> <p>Planning History - No recent relevant planning applications.</p>	<ul style="list-style-type: none"> • Is there developer interest given the market location? • Market area looks particularly poor. • Site also to be surrounding by huge employment allocation (reference D1). Due to the topography, this may have an impact on amenity. • BMBC's Ecology Assessment identifies areas of significant ecological value across the site, which will impact on the net developable area. This has not been taken into account in the site's capacity. We consider that a 50% reduction of the site's capacity should be considered in order to take account of the ecological importance of the site and any proposed mitigation. • Would ecology issues/mitigation costs render the site unviable? • If the site is deliverable, then why hasn't the site come forward for development yet given its UDP designation? 	No evidence has been presented by BMBC that the constraints identified by them and PBP are viably resolvable. Especially in respect of ecology, viability matters and developer interest. Given PBP's concerns particularly in respect of the market area and ecology matters, it is considered that further evidence needs to be provided to demonstrate the site's deliverability before it can be considered a deliverable residential development site.	0 Dwellings
H52	Site south of Beaver Street	54	<p>Barnsley UDP – Employment Proposal & Employment Policy Area</p> <p>2013 SHLAA Site Ref. 373 – Category 2 – 63 homes at 35pdh – Site performs well against suitability criteria. Minor drainage constraints identified. 10% - 25% of site area is within Flood Zone 3a. Site performs well against availability criteria. Site face some achievability constraints. Moderate achievability (cannot be used in first five years).</p> <p>2016 SHELAA – Treatment/remediation expected to be required Site within area likely to contain geological constraints of mining cavities</p> <p>BMBC 2016 Site Assessments</p>	<ul style="list-style-type: none"> • Has the developer confirmed interest in developing the remaining areas of the site? • Site has planning permission – are the numbers included in the BLPP's initial dwelling distribution table set out in Policy H2? • Historical Maps indicate that this site forms part of former 'Goldthorpe Colliery' and that part of the site was subsequently utilised as a landfill tip, thus with contamination and mining cavities likely to be present, it is important that remediation is factored into viability matters and delivery timescales. 	No evidence has been presented by BMBC that the constraints identified by them are resolvable. However, given that an outline planning application has been approved at the site in the last 2 years then it can optimistically be considered that a developer will progress with a Reserved Matters application within the next year. This position needs to be monitored though.	54 Dwellings

			<p>Low attractiveness area Site is marginally viable i.e. it neither generates a positive or negative residual value. Or site is unviable and generates a negative residual value.</p> <p>Planning History - An application for outline planning permission (Ref. 2013/1330) for residential use on the majority of the site was approved in 2014.</p>			
	BMBC Total	1,852 Dwellings			PBP Total	694 Dwellings

Cudworth						
Site Reference	Site Address	Indicative Number of Dwellings	BMBC Deliverability Comments	PBP Deliverability Comments	PBP Conclusion	PBP Yield in Plan Period
H32	Site adjacent Carrs Lane/ Summerdale Road, Cudworth	278	<p>Barnsley UDP – Safeguarded Land</p> <p>2013 SHLAA Ref. 298 – Category 1 – 167 Homes at 25dph. Site performs well against suitability, availability and achievability criteria. Some constraints identified by Highways Authority. Minor drainage constraints identified.</p> <p>2016 SHELAA – Some new access infrastructure required Some new drainage infrastructure required Site within area likely to contain geological constraints of mining cavities</p> <p>BMBC 2016 Site Assessments Site is marginally viable i.e. it neither generates a positive or negative residual value. Or site is unviable and generates a negative residual value</p> <p>Planning History - Full Planning Application for 278 homes (Ref. 2015/1070) approved subject to legal agreement in 2016.</p>	<ul style="list-style-type: none"> No comments. PB Planning are the planning agent acting on behalf of Barratt Homes on the full planning application referenced. Discussions in respect of the legal agreement associated with the application are ongoing. The site will be found viable in due course following agreement between BMBC and Barratt Homes. Whether via an appeal or not. 	Site is a deliverable residential development site.	278 Dwellings
H75	Land off Cudworth Bypass	192	<p>Barnsley UDP – Green Belt</p> <p>2013 SHLAA Ref. 398 – Category 1 – 258 Homes at 35dph. Site performs well against suitability, availability and achievability criteria</p> <p>2016 SHELAA – Some new access infrastructure required Some new drainage infrastructure required Site within area likely to contain geological constraints of mining cavities No availability information, but thought likely to be in private and/or multiple ownership.</p> <p>Planning History - No recent relevant planning applications.</p>	<ul style="list-style-type: none"> The site is part of three allocations in the same area. Does this mean there are land ownership issues (i.e. multiple ownership's). There looks to be access constraints. Though potential access to the south of the site. 	No evidence has been presented by BMBC that the constraints identified by them and PBP are viably resolvable. Notwithstanding this position it is considered that some housing development can be provided on the site over the course of the plan period.	192 Dwellings
H39	Site at Weetshaw Lane, Shafton	144	<p>Barnsley UDP – Urban Land to Remain Undeveloped</p> <p>2013 SHLAA Ref.312 – Category 2 – 117 Homes at 35pdh Site performs well against suitability criteria. Treatment expected to be required on part of the site. Site performs well against availability criteria. Site face some achievability constraints. Moderate achievability (cannot be used in first five years).</p>	<ul style="list-style-type: none"> Access to be taken from the existing roundabout spur in conjunction with site H76 or alternatively the access road adjacent. Site previously a quarry. Remediation needs to be factored into viability matters and delivery timescales. Historical Maps indicate former quarry on site and we also have knowledge of the quarry's existence. It is important that remediation is factored into viability matters and delivery timescales 	No evidence has been presented by BMBC that the constraints identified by them and PBP are viably resolvable. Notwithstanding this position it is considered that some housing development can be provided on the site over the course of the plan period. We	117 Dwellings

			2016 SHELAA – Some new access infrastructure required Site has bad neighbours with potential for mitigation Site within area likely to contain geological constraints of mining cavities BMBC 2016 Site Assessments Site within Flood zone 2 Planning History - No recent relevant planning applications.		consider that the SHLAA capacity should be used as this is a more appropriate density for the area.	
AC23	Land off Pontefract Road	192	Barnsley - UDP – Housing Proposal & Allotments 2013 SHLAA Ref.241 – Category 2 – 87 Homes at 25dph - Site faces some suitability constraints. Minor drainage constraints identified. Site performs well against availability criteria. Site performs well against achievability criteria BMBC 2016 Site Assessments On a greenspace where its loss would result in deficiency Planning History - Outline Planning Application (Ref. B/05/0773/CU) for residential development withdrawn in 2005.	<ul style="list-style-type: none"> Considering that this site has been a housing allocation since the adoption of the UDP in December 2000 (approximately 16 years ago), we question why only small parts of it have been developed and why it has not been brought forward comprehensively to date if it is viable. Looks to be access constraints and multiple land ownerships. Can the existing allotments included within the proposed allocation be re-located? 	No evidence has been presented by BMBC that the constraints identified by them and PBP are viably resolvable. Notwithstanding this position it is considered that some housing development can be provided on the site over the course of the plan period. A net density of 35dph has been used as we believe that this is a more appropriate density for the area.	122 Dwellings
H22	Site at Blacker Lane	160	Barnsley UDP – Safeguarded Land 2013 SHLAA Ref.278 – Category 2 – 92 Homes at 25dph - Site faces some suitability constraints. Some constraints identified by Highways Authority. Minor drainage constraints identified. Site performs well against availability criteria. Site performs well against achievability criteria 2016 SHELAA – 147 Homes BMBC 2016 Site Assessments Site is marginally viable i.e. it neither generates a positive or negative residual value. Or site is unviable and generates a negative residual value. Planning History - No recent relevant planning applications.	<ul style="list-style-type: none"> Poor market area. Large pylons cross the site Existing business premises on site – is the business willing to sell and relocate? Is there identified developer interest. Looks to be access constraints. We question why the site has not been brought forward for development to date given its UDP allocation would allow this. 	No evidence has been presented by BMBC that the constraints identified by them and PBP are viably resolvable. Especially in respect of access, viability matters and developer interest. Given PBP's concerns in respect of the market area and access matters, it is considered that further evidence needs to be provided to demonstrate the site's deliverability before it can be considered a deliverable residential development site.	0 Dwellings
	BMBC Total	966 Dwellings			PBP Total	709 Dwellings

Wombwell						
Site Reference	Site Address	Indicative Number of Dwellings	BMBC Deliverability Comments	PBP Deliverability Comments	PBP Conclusion	PBP Yield in Plan Period
H3	Land south of Doncaster Road	540	Barnsley UDP – Safeguarded Land 2013 SHLAA Site Ref. 188 - northern half of site – Category 1 – 536 homes at 35dph Site performs well against suitability, availability and achievability criteria. Minor drainage constraints identified. 2016 SHELAA – Site Ref. 188 – Site within area likely to contain geological constraints of mining cavities 2016 SHELAA - Site Ref. 957 – Southern half of the site – Some new access infrastructure required	<ul style="list-style-type: none"> No deliverability comments. Land registry documentation indicates that a substantial underground pipeline runs through the site and that the land is subject to an easement in favour of the British Pipeline Agency, clearly this will have serious implications in respect of dwelling capacity. BMBC's Ecology Assessment of the site identifies area of significant ecological value across the site. Area which will impact on the net developable area. This has not been taken into account in the site's capacity. We consider that a 30% reduction of the site's capacity should be considered in order to take account of the ecological importance of the site and any proposed mitigation. 	No evidence has been presented by BMBC that the constraints identified by them and PBP are viably resolvable. Especially in respect of ecology matters. Notwithstanding this position it is considered that some housing development can be provided on the site over the course of the plan period. On account of the significant ecology issues identified by	378 Dwellings

			<p>Some new drainage infrastructure required Site within area likely to contain geological constraints of mining cavities No availability information, but thought likely to be in private and/or multiple ownership.</p> <p>BMBC 2016 Site Assessments Very detrimental ecological impact Low landscape capacity</p> <p>BMBC 2016 Housing Ecological Assessment Biodiversity Score 1</p> <p>Planning History - No recent relevant planning applications.</p>	<ul style="list-style-type: none"> Historical Maps indicate a former sand mine within site boundaries. Thus remediation needs to be factored into viability matters and delivery timescales. Is there a willing landowner? As we understand there is an uplift clause exists on the land which may render it unviable/unsuitable for the present landowner to sell. We question why the site has not been brought forward for development to date given its UDP allocation would allow this. 	BMBC, we have reduced the capacity by 30%.	
H40	Site of former Foulstone School Playing Fields	189	<p>Barnsley UDP – Existing Community Facility</p> <p>2013 SHLAA Site Ref. 314 – Category 2 – 235 homes at 35dph - Site performs well against suitability criteria. Minor drainage constraints identified. Site performs well against availability criteria Site face some achievability constraints. Moderate achievability (cannot be used in first five years).</p> <p>2016 SHELAA – Extensive new drainage infrastructure required Treatment/remediation expected to be required</p> <p>BMBC 2016 Site Assessments Low landscape capacity</p> <p>Planning History - No recent relevant planning applications.</p>	<ul style="list-style-type: none"> Large Pylons cross the site, which are likely to impact upon the net developable area. Loss of existing community facility (playing fields) looks to be justified given current condition of the site. 	No evidence has been presented by BMBC that the constraints identified by them are resolvable. Notwithstanding this position it is considered that some housing development can be provided on the site over the course of the plan period.	189 Dwellings
AC39	Land off Margaret Road, Darfield	109	<p>Barnsley UDP – Safeguarded Land & Housing Policy Area</p> <p>2013 - SHLAA Site Ref. 516 & 452 – Category 2 – 93 homes at 35dph – Site faces some suitability constraints. Minor drainage constraints. Likely to be constrained by geological constraints/mining cavities. Site performs well against availability criteria. Site performs well against achievability criteria.</p> <p>2016 SHELAA – Treatment/remediation expected to be required No information, but thought likely to be in private and/or multiple ownership</p> <p>BMBC 2016 Site Assessments Low landscape capacity</p> <p>Planning History - No recent relevant planning applications.</p>	<ul style="list-style-type: none"> Poor market area. Is there identified developer interest. Paul, the majority of the site is located within the Green belt in the UDP? Historical maps indicate that the site is situated adjacent to the former 'Darfield Main' Colliery thus with the potential for mining cavities to be present it is important that remediation is factored into viability matters and delivery timescales 	No evidence has been presented by BMBC that the constraints identified by them and PBP are viably resolvable. Notwithstanding this position it is considered that some housing development can be provided on the site over the course of the plan period. We believe that the SHLAA capacity should be used as this is a more appropriate density for the area.	93 Dwellings
H70	Land east of Lundhill Road	160	<p>Barnsley UDP – Safeguarded Land</p> <p>2013 SHLAA Site Ref. 510 – Category 2 – 95 homes at 25dph – Site faces some suitability constraints. Minor drainage constraints. Site performs well against availability criteria. Site face some achievability constraints. Moderate achievability (cannot be used in first five years).</p> <p>2016 SHELAA – Site has bad neighbours with potential for mitigation Site within area likely to contain geological constraints of mining cavities</p>	<ul style="list-style-type: none"> No deliverability comments. Site being promoted by Persimmon Homes for 165 homes. Historical Maps indicate mining uses associated with the former 'Lundhill colliery' and a refuse tip adjacent, thus with the potential for mining cavities and contamination to be present, it is important that remediation is factored into viability matters and delivery timescales 	The promotion of the site by Persimmon Homes, a national housebuilder which undertakes stringent deliverability assessments prior to progressing with sites, demonstrates that the site can be considered deliverable. Persimmon's promotion of the site for 165 homes also provides evidence of the proposed future density and the housing mix they consider appropriate for the site.	165 Dwellings

			Planning History - No recent relevant planning applications.			
AC40	Former Wombwell High School, Wombwell	250	Barnsley UDP – Existing Community Facility 2013 SHLAA Site Ref. 293 – Category 1 – 256 homes at 35dph – Site performs well against suitability, availability and achievability criteria. Some constraints identified by Highways Authority. Treatment expected to be required on part of the site. 2016 SHELAA – Some new access infrastructure required Treatment/remediation expected to be required Site within area likely to contain geological constraints of mining cavities. Planning History - No recent relevant planning applications.	<ul style="list-style-type: none"> Potential access constraints to development capacity. Historical Maps indicate former mining uses nearby associated with the 'Lundhill Colliery', thus with the potential for mining cavities to be present, remediation should be factored into viability matters and delivery timescales. 	No evidence has been presented by BMBC that the constraints identified by them are resolvable. Notwithstanding this position it is considered that some housing development can be provided on the site over the course of the plan period. We believe that the SHLAA capacity should be used as this is a more appropriate density for the area.	250 Dwellings
	BMBC Total	1,248 Dwellings			PBP Total	1,075 Dwellings

Hoyland						
Site Reference	Site Address	Indicative Number of Dwellings	BMBC Deliverability Comments	PBP Deliverability Comments	PBP Conclusion	PBP Yield in Plan Period
AC31	Broad Carr Road	131	Barnsley UDP – Green Belt 2013 SHLAA Site Ref. 631 (site is a small part of) – Category 2 – 630 homes at 25dph. Site faces some suitability constraints. Minor drainage constraints identified. Site faces some availability constraints. Site face some achievability constraints. Moderate achievability (cannot be used in first five years). 2016 SHELAA – Site has bad neighbours with potential for mitigation No availability information, but thought likely to be in private and/or multiple ownership BMBC 2016 Site Assessments Extensive new drainage infrastructure required Treatment/remediation expected to be required Site within area likely to contain geological constraints or mining cavities Planning History - No recent relevant planning applications.	<ul style="list-style-type: none"> We believe that the site has access constraints. There are potential ecology and arboriculture constraints associated with Skiers Wood Local Wildlife Site, which will either render the site undeliverable or reduce the site's developable quantum. Large pylons located across the site which are likely to impact on the net developable area. Only suitable access point looks to be ultimately from site H7. Site should also be considered as part of Sites H45, H7 & H8 in respect of build rates due to proximity of sites H45, H7 & H8 i.e. there will be no more than three selling outlets on sites AC31, H45, H7 & H8 at the same time in order to limit competition. Total number of homes proposed by Barnsley MBC from sites H45, H7, H8 & AC31 is 993. Historical Maps indicate the former 'Skiers Wood' Colliery and Drift Mine on site, thus it is important that remediation is factored into viability matters and delivery timescales 	No evidence has been presented by BMBC that the constraints identified by them and PBP are viably resolvable. Especially in respect of access, ecology and site availability. Access to the site is a clear physical and availability (ransoms) limitation and accordingly should the site be deliverable in the future this would be following the delivery of sites H7, H8 & H45, which would optimistically be in years 10+ of the local plan period on account of the constraints identified. However, until evidence is provided to identify that the site's deliverability constraints can be viably overcome then the site cannot be considered deliverable.	0 Dwellings
H45	Springwood farm and adjoining land	696	Barnsley UDP – Safeguarded Land 2013 SHLAA Site Ref. 339 – Category 2 – 295 homes at 25dph – Site faces some suitability constraints. Some constraints identified by Highways Authority. Minor drainage constraints identified. Site performs well against availability criteria. Site face some achievability constraints. Moderate achievability (cannot be used in first five years). 2016 SHELAA – 554 Homes	<ul style="list-style-type: none"> Severe access constraints as the site is required to be accessed via Site H7. Is there any developer interest which is essential given a site of this size? Can Hoyland sustain two sites of this size, (i.e. along with Site Ref. H16) from a developer interest point of view considering this is a weak market area in the Borough? Site should also be considered as part of Sites AC31, H7 & H8 in respect of build rates due to proximity of sites AC31, H7 & H8 i.e. there will be no more than three selling outlets on sites AC31, H45, H7 & H8 at the same time in order to limit competition. Total number of homes proposed by Barnsley MBC from sites H45, H7, H8 & AC31 is 993 	No evidence has been presented by BMBC that the constraints identified by them and PBP are viably resolvable. Especially in respect of access. Access to the site is a clear physical and availability (ransoms) limitation and accordingly should the site be deliverable in the future this would be following the delivery of sites H7 & H8, which would optimistically be in years 5+ of the local plan period on account	554 Dwellings from year 5+ of the plan period.

			<p>Site within area likely to contain geological constraints of mining cavities</p> <p>Planning History - No recent relevant planning applications.</p>	<ul style="list-style-type: none"> Historical Maps indicate former mining uses and associated shafts in the vicinity, thus it is important that remediation is factored into viability matters and delivery timescales. 	<p>of the constraints identified. We believe that the SHLAA capacity should be used as this is a more appropriate density for the area.</p>	
AC30	Land at Tankersley Lane	118	<p>Barnsley UDP – Green Belt</p> <p>2013 SHLAA Site Ref. 392 – Category 2 – 72 homes at 35dph – Site faces some suitability constraints. Major constraints identified by County Council Highways Authority. Minor drainage constraints identified. Site 200m - 800m of an AQMA. Site performs well against availability criteria Site face some achievability constraints. Moderate achievability (cannot be used in first five years).</p> <p>2016 SHELAA – 101 Homes Site within area likely to contain geological constraints of mining cavities</p> <p>BMBC 2016 Site Assessments Extensive new access infrastructure required</p> <p>Planning History - No recent relevant planning applications.</p>	<ul style="list-style-type: none"> The proposed employment allocation reference HOY 1 which surrounds the site could impact on the its attractiveness to residential developers. Have the owners of the Transport Depot off Sheffield Road identified a willingness to sell – if not, the site faces significant access constraints which may not be overcome. Multiple ownerships. Have all the landowners confirmed that the site is available? Has developer interest been identified? 	<p>No evidence has been presented by BMBC that the constraints identified by them and PBP are viably resolvable. Notwithstanding this position, optimistically, it is considered that some housing development can be provided on the site over the course of the plan period. We believe that the SHELAA capacity should be used as this is a more appropriate density for the area.</p>	101 Dwellings
H16	Site north of Hoyland Road	603	<p>Barnsley UDP – Safeguarded Land</p> <p>2013 SHLAA Site Ref.253 – Category 2 – 425 homes at 35 dph. Site performs well against suitability criteria. Minor drainage constraints identified. Site 200m - 800m of an AQMA. Site performs well against availability criteria. Site face some achievability constraints. Moderate achievability (cannot be used in first five years).</p> <p>2016 SHELAA – Site within area likely to contain geological constraints of mining cavities No availability information, but thought likely to be in private and/or multiple ownership</p> <p>Planning History - No recent relevant planning applications.</p>	<ul style="list-style-type: none"> Multiple ownerships. Have all the landowners confirmed that the site is available. Is there any developer interest which is essential given a site of this size? Can Hoyland sustain two sites of this size, (i.e. along with Site Ref. H45) from a developer interest point of view, considering this a weak market area in the Borough? If the site is deliverable, why has it not been brought forward to date considering its UDP allocation would allow this? Site adjacent to the former 'Rockingham Colliery' and historical maps suggest that part of the site was also subject to open cast mining, thus remediation needs to be factored into viability matters and delivery timescales. Can the allotments to the West of the site be relocated? 	<p>No evidence has been presented by BMBC that the constraints identified by them and PBP are viably resolvable. Especially in relation to availability (including ransoms) and developer interest. Notwithstanding this position it is considered that some housing development can be provided on the site over the course of the plan period. We believe that the SHLAA capacity should be used as this is a more appropriate density for the area.</p>	425 Dwellings
H4	Land south of Hay Green Lane	115	<p>Barnsley UDP – Safeguarded Land</p> <p>SHLAA Site 217 (site is a very small part of circa 1/8) – Category 2 – 365 homes at 25dph. Site faces some suitability constraints. Some constraints identified by Highways Authority. Minor drainage constraints identified. Site 200m - 800m of an AQMA. Site performs well against availability criteria. Site face some achievability constraints. Moderate. achievability (cannot be used in first five years).</p> <p>2016 SHELAA – Site within area likely to contain geological constraints of mining cavities</p> <p>Planning History - No recent relevant planning applications.</p>	<ul style="list-style-type: none"> If the site is deliverable, why has it not been brought forward to date considering its UDP allocation would allow this? Is there a willing landowner? Site nearby the former 'Rockingham Colliery' providing the potential for mining cavities to be present in which case remediation needs to be factored into viability matters and deliverability timescales. 	<p>No evidence has been presented by BMBC that the constraints identified by them are resolvable. Notwithstanding this position it is considered that some housing development can be provided on the site over the course of the plan period.</p>	115 Dwellings
	BMBC Total	1,663 Dwellings			PBP Total	1,195 Dwellings

Penistone

Site Reference	Site Address	Indicative Number of Dwellings	BMBC Deliverability Comments	PBP Deliverability Comments	PBP Conclusion	PBP Yield in Plan Period
H81	Land South of Well House Lane, Penistone	132	<p>Barnsley UDP – Green Belt</p> <p>2013 SHLAA - No SHLAA Assessment available.</p> <p>2016 SHELAA - Ref 926 (part of) – 437 Homes Some new access infrastructure required Some new drainage infrastructure required Treatment/remediation expected to be required Site within area likely to contain geological constraints of mining cavities No availability information, but thought likely to be in private and/or multiple ownership</p> <p>BMBC 2016 Site Assessments High landscape sensitivity Low landscape capacity</p> <p>Planning History - No recent relevant planning applications.</p>	<ul style="list-style-type: none"> Site is deliverable. Site submitted by landowner/developer. 	Site is a deliverable residential development site.	132 Dwellings
H82	Land South of Halifax Road, Penistone	414	<p>Barnsley UDP – Green Belt</p> <p>2013 SHLAA Site Ref. 680 (south east part of site) – No SHLAA Assessment available.</p> <p>2016 SHELAA - Ref 926 (part of), 680 & 910 – 661 Homes Some new access infrastructure required Some new drainage infrastructure required Treatment/remediation expected to be required Site within area likely to contain geological constraints of mining cavities No availability information, but thought likely to be in private and/or multiple ownership</p> <p>BMBC 2016 Site Assessments High landscape sensitivity Low landscape capacity</p> <p>Planning History - No recent relevant planning applications.</p>	<ul style="list-style-type: none"> Site is deliverable. Site submitted by landowner/developer. PBP are the planning agent for a recent pre-application enquiry for a national housebuilder on the site. Keen developer interest. Developer has submitted a number of technical documents to BMBC throughout the Local Plan preparation process to demonstrate that the site is deliverable. This work has included design, highways and landscape material. No mining cavities to affect. No mining has been undertaken within this location. 	Site is a deliverable residential development site.	414 Dwellings
SAF37	Land at Springvale, Penistone	0.9Ha	<p>Barnsley UDP – Safeguarded Land</p> <p>No 2013 SHLAA or 2016 SHELAA Site Ref.</p> <p>Planning History - No recent relevant planning applications.</p>	<ul style="list-style-type: none"> Severe access constraints; Severe topographical constraints that would render the site unviable and thus undeliverable. Site also identified as “Spring Vale Riverside Wildlife Haven” by a sign at the site’s entrance. If the site was deliverable and had developer interest, then it would have come forward by this point due to the site’s existing UDP 	There is no available evidence that the deliverability constraints identified by PBP are viably resolvable. Especially in respect of access, topography and the ecological value of the site. The fact that the site has not come forward	Site Not Developable

				designation and location within a strong market area in the West of the Barnsley Borough.	at this point given its UDP designation also signifies the site's lack of deliverability.	
SAF16	West of Castle Lane, Penistone	2.9Ha	<p>Barnsley UDP – Safeguarded Land</p> <p>2013 SHLAA Site Ref. 307 – Category 2 – 56 homes at 25dph - Site faces some suitability constraints. Major constraints identified by County Council Highways Authority. Minor drainage constraints identified. Site performs well against availability criteria. Site performs well against achievability criteria.</p> <p>2016 SHELAA – Site within area likely to contain geological constraints of mining cavities No availability information, but thought likely to be in private and/or multiple ownership</p> <p>Planning History - No recent relevant planning applications.</p>	<ul style="list-style-type: none"> • Site has severe access constraints off a narrow carriageway country lane. • The delivery of this site will have an adverse impact on the area's landscape character; • Although the boundary to the south of the site is a strong woodland edge, helping to screen views from the south, the western edge consists of a narrow line of broken, intermittent vegetation along a field boundary. Therefore, development of this site would result in a weak western edge to the Green Belt in this area; • The delivery of this site would exacerbate the existing highways problems of Penistone and create rat running through Cubley. Especially when considered cumulatively with any development of site SAF17. • The Council's previous assessment of the site prior to the SHLAA process identifies the preference to leave the site as open fields unless a sensitive development including stone barn type housing was considered. • If the site was deliverable and had developer interest, then it would have come forward by this point due to the site's existing UDP designation and location within a strong market area in the west of the Barnsley Borough • We are informed that the landowner is unwilling. 	There is no available evidence that the deliverability constraints identified BMBC and PBP are viably resolvable. Especially in respect of access, highways matters, landscape and availability. The fact that the site has not come forward at this point given its UDP designation also signifies the site's lack of deliverability.	Site Not Developable
SAF17	East of Castle Lane, Penistone	4.8Ha	<p>Barnsley UDP – Safeguarded Land</p> <p>2013 SHLAA Site Ref. 348 – Category 2 – 90 homes at 25dph - Site faces some suitability constraints. Major constraints identified by County Council Highways Authority. Minor drainage constraints identified. Treatment expected to be required on part of the site. Site performs well against availability criteria. Site performs well against achievability criteria.</p> <p>2016 SHELAA – Site has bad neighbours with potential for mitigation Site within area likely to contain geological constraints of mining cavities No availability information, but thought likely to be in private and/or multiple ownership</p> <p>Planning History - No recent relevant planning applications.</p>	<ul style="list-style-type: none"> • Site has severe access constraints off a narrow carriageway country lane adjacent a working farm and beyond a blind bend. • The delivery of this site will have an adverse impact on the area's landscape character; • The western and eastern boundaries of the site are unclear and largely indefensible, defined by a combination of very weak arbitrary vegetation and weak dry stone wall boundaries; • The landscape character of this side of Penistone is of high quality. Characterised by quiet, tranquil, narrow country roads flanked by dry stone walls with open views punctuated by stands of mature trees. The development of the site would have an adverse impact on this landscape character; • The delivery of this site would exacerbate existing highways problems of Penistone and create rat running through Cubley. Especially when considered cumulatively with any development of site SAF16; • Large high voltage Pylon lines which emanate from a substantial electrical substation immediately adjoining the site are likely to constrain development. • The Council's previous assessment of the site prior to the SHLAA process identifies that the development of the site would be detrimental to the urban character of the area as a whole. • If the site was deliverable and had developer interest, then it would have come forward by this point due to the site's existing UDP designation within a strong market area in the west of the Barnsley Borough. 	There is no available evidence that the deliverability constraints identified BMBC and PBP are viably resolvable. Especially in respect of access, highways matters, landscape and availability. The fact that the site has not come forward at this point given its UDP designation also signifies the site's lack of deliverability.	Site Not Developable
SAF38	Land off Moors Avenue, Penistone	3.1Ha	<p>Barnsley UDP – Safeguarded Land</p> <p>2013 SHLAA Site Ref. 333 – Category 1 – 34 homes at 15 dph - Site performs well against suitability, availability and achievability criteria. Major constraints identified by County Council Highways Authority. Minor drainage constraints identified.</p> <p>2016 SHELAA – Site within area likely to contain geological constraints of mining cavities No availability information, but thought likely to be in private and/or multiple ownership</p>	<ul style="list-style-type: none"> • The delivery of this site will have an adverse impact on the area's landscape character; • The Green Belt currently has a strong and well defined edge to the adjacent residential area to the west of the site. This is defined by a well-established belt of woodland which also provides a setting for a footpath and screening for the existing residential development. • The proposed development boundary would be along a weak existing field boundary line sparsely marked by occasional trees and shrubs. • The development of the site would result in an extremely weak and irregular boundary to the Green Belt with very few defining features which might act as a barrier to curtail future expansion or development of this area. • Access to the site is severely constrained at the main access point at Lyndhurst Bank; 	There is no available evidence that the deliverability constraints identified BMBC and PBP are viably resolvable. Especially in respect of access, highways matters, landscape and availability. The fact that the site has not come forward at this point given its UDP designation also signifies the site's lack of deliverability.	Site Not Developable

			Planning History - No recent relevant planning applications.	<ul style="list-style-type: none"> It is highly probable that motorists leaving this site at peak times would attempt to avoid traffic congestion in the Town centre by travelling along Mortimer Road, Oxspring Road, Long lane and Roughbitchworth Lane, which leads onto the B6462 in the centre of Oxspring. Creating rat running. These highways are all narrow country lanes which are wholly unsuitable for increased volumes of commuter traffic, causing a road safety hazard. If the site was deliverable and had developer interest, then it would have come forward by this point due to the site's existing UDP designation within a strong market area in the west of the Barnsley Borough. 		
SAF31	Land off Mortimer Road, Cubley	5.5Ha	Barnsley UDP – Safeguarded Land 2013 SHLAA Site Ref. 268 – Category 1 – 104 homes at 25dph. Site performs well against suitability, availability and achievability criteria. Minor drainage constraints identified. Minor drainage constraints identified. 2016 SHELAA – No availability information, but thought likely to be in private and/or multiple ownership Planning History - No recent relevant planning applications.	<ul style="list-style-type: none"> Site not currently available. The delivery of this site will have an adverse impact on the area's landscape character; The development of the site would redefine an existing strong boundary edge of mature woodland to create a poor outer boundary to development defined by a weak dry stone wall boundary to the east and a very weak wire fence boundary to the south; The proposed development would significantly impact upon the landscape setting of the historic Cubley Hall which has had a rural outlook since it was built in the 1700's. The hall is a local feature and landmark and is well used by the local community; The delivery of this site will exacerbate existing highways problems within Penistone Town Centre, which would have to be traversed if using the main route out of Penistone; This Site would substantially increase car journeys through Penistone Town Centre as Cubley has very limited bus services. It is also far less accessible to Penistone Railway station; It is highly probable that motorists leaving this site at peak times would attempt to avoid traffic congestion in the Town centre by travelling along Mortimer Road, Oxspring Road, Long lane and Roughbitchworth Lane, which leads onto the B6462 in the centre of Oxspring. Creating rat running. These highways are all narrow country lanes which are wholly unsuitable for increased volumes of commuter traffic, causing a road safety hazard. If the site was deliverable and had developer interest, then it would have come forward by this point due to the site's existing UDP designation within a strong market area in the west of the Barnsley Borough. 	There is no available evidence that the deliverability constraints identified BMBC and PBP are viably resolvable. Especially in respect of heritage, highways matters, landscape and availability. The fact that the site has not come forward at this point given its UDP designation also signifies the site's lack of deliverability.	Site Not Developable
H69	Land at Sheffield Road	42	Barnsley UDP – Mixed Use Development 2013 SHLAA Site Ref.501 – Category 3 – 33 homes at 25dph - Site faces significant suitability constraints. Site performs well against availability criteria. Site performs well against achievability criteria. Within an area of defined employment land. 2016 SHELAA – Site has bad neighbours with potential for mitigation Site within area likely to contain geological constraints of mining cavities BMBC 2016 Site Assessments High landscape sensitivity Low landscape capacity Planning History - Outline Planning Application (Ref. 2012/1363) for residential development approved in 2014. No reference to a Reserved Matters application being submitted as of yet which suggests that no developers are currently interested in the site.	<ul style="list-style-type: none"> Site has Planning Permission, however, we are aware that the site has a number of extensive ground problems (structural and Contamination) and the cost of remediation is likely to render this site unviable for residential development. The site has been actively marketed for sale for over 4 years, but despite having the benefit of residential approval, no developer has ultimately been forthcoming. The remediation requirements of developing a site for commercial / Employment uses are generally less stringent; as such this may be a more viable option for this site. 	No evidence has been presented by BMBC that the constraints identified by them and PBP are viably resolvable. Notwithstanding this position it is considered that some housing development can be provided on the site over the course of the plan period.	42 Dwellings
H47	Site south east of Schole Hill Lane, Penistone	139	Barnsley UDP – Safeguarded Land 2013 SHLAA Site Ref. 349 – Category 1 – 92 homes at 25dph - Site performs well against suitability, availability and achievability criteria.	<ul style="list-style-type: none"> Site has planning permission with development underway by Persimmon Homes— are the numbers included in the BLPP's initial dwelling distribution table set out in Policy H2? 	Site is a deliverable residential development site.	139 Dwellings

			<p>Minor drainage constraints identified.</p> <p>2016 SHELAA – Site within area likely to contain geological constraints of mining cavities</p> <p>BMBC 2016 Site Assessments High landscape sensitivity Low landscape capacity</p> <p>Planning History - Full planning application (Ref. 2013/0785) for Residential development of 139 no. dwellings with associated access, car parking and landscaping was approved in 2014. Site is currently being developed by Persimmon.</p>			
H25	Land at Talbot Road, Penistone	30	<p>Barnsley UDP – Urban Land to Remain Undeveloped</p> <p>2013 SHLAA Site Ref. 467 & 284 – Category 1 – 33 homes at 15dph – Site performs well against suitability, availability and achievability criteria. Minor drainage constraints identified.</p> <p>BMBC 2016 Site Assessments Site within Flood zone 2 High landscape sensitivity Low landscape capacity</p> <p>Planning History - No recent relevant planning applications.</p>	<ul style="list-style-type: none"> Severe topographical issues across the site rendering the deliverability of new homes problematic. A cut and fill exercise together with substantial retaining wall costs would mean that developing this area for housing is cost prohibitive; Access would have to come from Talbot Road. The only suitable access point for a new road would be from the unmade section of Talbot Road. Even if this was deliverable it would necessitate the upgrading of this entire unmade road down to Thurlstone Road (A628). Any additional traffic generated by new housing would then impact on the junctions of Talbot Road with Thurlstone Road and Bridge Street; The Council's previous assessment of the site through the preparation of the UDP identifies that the it is steeply sloping with access constraints and that development of the site would increase traffic movements at the restricted junctions with Talbot Road, Thurlstone Road and Bridge Street; Recent development/extension of the car parks associated with the two public houses to the north has encroached into the site. Car parks and other uses around them were recently classed as a nuisance leading to the refusal of a planning application on part of this site. (See plan) This would still be the case for any new proposals. There is a gas main located within vicinity of the site, issues with this include amenity concerns associated with noise. If the site was deliverable and had developer interest, then it would have come forward by this point due to the site's existing UDP designation within a strong market area in the west of the Barnsley Borough. 	No evidence has been presented by BMBC that the constraints identified by them and PBP are viably resolvable. Especially in respect of topographical, access and developer interest. Until evidence is provided to identify that the site's deliverability constraints can be overcome then the site cannot be considered deliverable.	0 Dwellings
H34	Land east of Saunderson Avenue, Penistone	29	<p>BU DP – Urban Land to Remain Undeveloped & Housing Policy Area</p> <p>2013 SHLAA Site Ref. 302 (Part of) – Category 1 – 19 dwellings at 15dph – Site performs well against suitability, availability and achievability criteria.</p> <p>2016 SHELAA – Some new access infrastructure required</p> <p>BMBC 2016 Site Assessments Site within Flood zone 2 High landscape sensitivity Low landscape capacity</p> <p>Planning History - No recent relevant planning applications.</p>	<ul style="list-style-type: none"> The existing access off Bent Street from Thurlstone Road (A628) has poor visibility and is unlikely to be able to be improved. Therefore, road access must come from Saunderson Road past the recently completed low cost affordable homes. Potential issues associated with additional traffic accessing Saunderson Road. If the site was deliverable and had developer interest, then it would have come forward by this point due to the site's existing UDP designation within a strong market area in the west of the Barnsley Borough. 	No evidence has been presented by BMBC that the constraints identified by them and PBP are viably resolvable. Notwithstanding this position it is considered that some housing development can be provided on the site over the course of the plan period.	29 Dwellings
SAF21	South of New Smithy Drive, Thurlstone	4.4Ha	<p>Barnsley UDP – Safeguarded Land</p> <p>2013 SHLAA Site Ref. 332 & 255 – Category 2 – 86 homes at 25dph – Site faces some suitability constraints. Some constraints identified by Highways Authority.</p>	<ul style="list-style-type: none"> There are severe access constraints on Towngate associated with the width of the road and also the steep junction with Thurlstone Road resulting in cars needing to enter the opposite carriageway when leaving Towngate to obtain a clear view of road traffic and to enable a left turn; The access raises safety implications for cars and it would be 	There is no available evidence that the deliverability constraints identified BMBC and PBP are viably resolvable. Especially in respect of access, highways matters, landscape	Site Not Developable

			<p>Minor drainage constraints identified. Site performs well against availability criteria. Site face some achievability constraints. Moderate achievability (cannot be used in first five years).</p> <p>2016 SHELAA – No information, but thought likely to be in private and/or multiple ownership</p> <p>Planning History - No recent relevant planning applications.</p>	<p>virtually impossible for construction traffic to access/egress from the junction with Thurlstone Road. There is no potential to upgrade the junction due to level issues in this location;</p> <ul style="list-style-type: none"> • The site's access is severely constrained as a result of narrow roads on Westfield Land and Westfield Avenue. When cars are parked on street on these roads it is nearly impossible to drive a car along them. It will therefore be virtually impossible for construction traffic to access the site, particularly without significant disruption; • Substandard footpath provision from Towngate impacting on the site's sustainability and safe accessibility on foot; there is no real prospect of footpath improvement/provision due to the narrow nature of the roads in this location. • The delivery of this site will have an adverse impact on the area's landscape character; • The proposed boundary to the west is a very weak arbitrary line with no defining features. The northern boundary is also weak, defined only by a dirt track. • If the site was deliverable and had developer interest, then it would have come forward by this point due to the site's existing UDP designation within a strong market area in the west of the Barnsley Borough. 	<p>and availability. The fact that the site has not come forward at this point given its UDP designation also signifies the site's lack of deliverability.</p>	
SAF18	North and South of Roughbitchworth Lane, Oxspring	5.10Ha	<p>Barnsley UDP – Safeguarded Land</p> <p>2013 SHLAA Site Ref. 341 – Category 2 – 102 homes at 25dph – Site faces some suitability constraints. Some constraints identified by Highways Authority. Minor drainage constraints identified. Site performs well against availability criteria. Site performs well against achievability criteria</p> <p>2016 SHELAA – No information, but thought likely to be in private and/or multiple ownership</p> <p>Planning History - No recent relevant planning applications.</p>	<ul style="list-style-type: none"> • The delivery of this site will have an adverse impact on the area's landscape character; • There are presently no defensible boundaries on the western and southern boundaries of the site; the northern boundary is an arbitrary line across an open grassed field • The proposed designation boundary (northern) does not follow existing field patters and consequently it's development would have a negative landscape impact; • There are severe drainage implications associated with connections to the existing network which may not be possible in the worst case. Gravity systems for both foul and surface water are not achievable based on site topography without the need to provide pumping for both surface and foul water. Therefore, any specific site layout proposals will need to take the requirements for pumping stations and the associated 15m no build zone into account. An Independent Drainage report in respect of this site and its issues has been submitted to BMBC. • Ecology issues have been identified by qualified consultants Smeeden Foreman in respect of the presence of an active Badger sett adjacent to the site. Therefore, development at the site has the potential to have an adverse effect on this species. Further survey work is also required for bats and Water Voles to determine the impact on these species; • Further development to the south west of Oxspring would both ignore and conflict with the historic linear pattern of development of Oxspring between the Trans Pennine Trail and the B6462 'Sheffield Road'/ River Don valley area.; • Development in this location is already beginning to encroach upon the rural nature of the adjacent hamlet of Roughbitchworth. Further development would have a profound impact and increase coalescence with Oxspring; • The site is capable of supporting Green Belt purposes. Especially in respect of coalescence and also as the site's draft designation boundary ignores the principle of defining enduring physical boundaries given the artificial boundaries that have been proposed; • The Arup Green Belt assessment report identifies that the development of the site would weaken the integrity of the Green Belt; • YLL understand that there are drainage issues associated with this area of Oxspring. Evidence of this can be taken from incidents that have occurred on the Brookfield development the delivery of which it had involvement in; • The vast majority of vehicular traffic from the two combined sites including construction traffic would access the wider highway network by travelling north across the bridge over the Trans Pennine 	<p>There is no available evidence that the deliverability constraints identified BMBC and PBP are viably resolvable. Especially in respect of access, drainage, highways matters, landscape and availability. The fact that the site has not come forward at this point given its UDP designation also signifies the site's lack of deliverability.</p>	Site Not Developable

				Trail which leads to the B6462 'Sheffield Road' which due to width restrictions already has traffic management measures in place; <ul style="list-style-type: none">• Directly adjacent to the north of the bridge is Oxspring Primary School, where on street parking at school drop off and pick up times restricts the available width for passing traffic which would include the majority of traffic from this site. Construction traffic would also pose a significant safety risk.• It is a matter of public record that the Landowner has made known he is unwilling to sell the land.		
	BMBC Total	786 Dwellings			PBP Total	756 Dwellings

Housing Allocation Assessment Conclusion

Area	BMBC Total	PBP Total	Difference
Urban Barnsley	6,080	4,001	-2,079
Royston	770	740	-30
Goldthorpe (Dearne Towns)	1,852	694	-1,158
Cudworth	966	709	-257
Wombwell	1,248	1075	-173
Hoyland	1,663	1,195	-468
Penistone	786	756	-30
Total	13,365	9,170	-4,195

Safeguarded Land Assessment Conclusion

None of the current safeguarded site designations in Penistone can be considered developable housing sites due to a multiplicity of issues. Accordingly, we believe that additional safeguarded land sites need to be identified to ensure Green Belt permanence and future deliverability.

Urban Extensions

Assessment of Delivery Rates

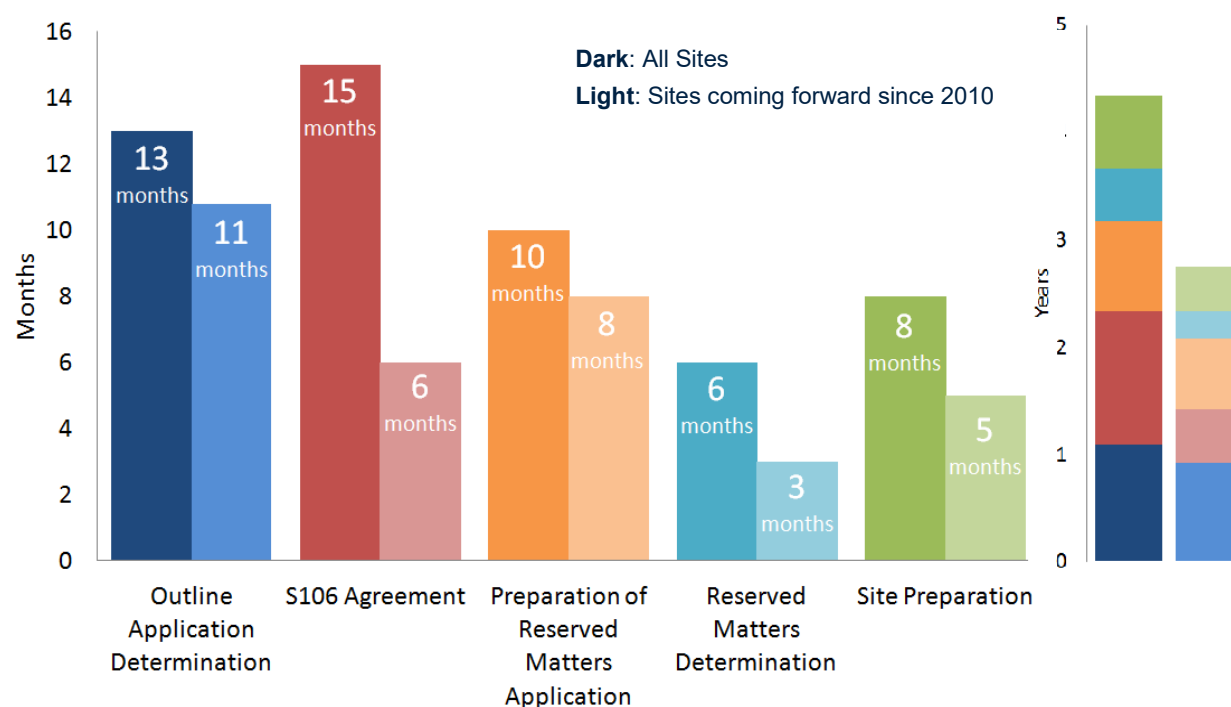
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1. Summary and Conclusions

This report assesses the pace of delivery of large scale development in order to establish how these sites contribute to five year housing land supply and the implementation of development plans. It considers firstly how long it takes for an urban extension to progress through the planning system, and once construction has started, the rate at which new housing units are delivered.

The report tracks the progress of 84 urban extensions through the planning system over the last 25 years. On average across all sites analysed, an urban extension site starts construction on **the first phase of housing more than four years after the submission of an outline application**. There are however many exceptions to this timescale. Whilst it is **not unusual for sites to take much longer**, in recent years urban extension sites have tended to progress more quickly. Considering only sites coming forward **since 2010**, the average time taken to start on **site drops to under three years after the submission of an outline application**.



Nevertheless, there are clearly significant risks of longer timeframes on these large complex sites. Delays can occur at any stage of the process, and can be due to many factors such as problems with funding, infrastructure requirements or local objections. However, the individual nature of these sites means it is difficult to identify absolute trends.

Some urban extensions have progressed through the planning process **more quickly in established growth areas**, suggesting that the appetite of the local authority for development and the resource available for progressing major planning applications plays a crucial role. Analysis of the sites in the sample indicates that, once construction starts and in a strong market, annual delivery can be anticipated to be around **60 units in first year of construction, picking up to more than 100 units per annum in subsequent years and increasing to around 120 units**. The build out rate of each site will depend on the disposal strategy of each developer, but the presence of multiple developers on site helps to drive higher annual completion

Urban Extensions

Assessment of Delivery Rates



rates. **We are aware of many urban extensions in the south of England where recent delivery rates have been substantially in excess of 120 units per annum.**

It should be noted that the above timescales do not take into account:

- a) Time taken between the allocation of the site and starting preparation of the planning application
- b) Pre application discussions/negotiations and preparation of the outline planning application
- c) The period between starting construction and delivering the first residential unit.

This study has not provided evidence in relation to these time periods. **Whilst previous research estimated b) and c) at 2.5 years, it is also the case that outline applications can be made very soon after allocation**, where local planning authorities and a developer are working together to bring forward sites, allowing processes to run in parallel.

In simple terms the data reviewed for the study points to the following indicative timescales.

	All sites	Post 2010 sites
Not reviewed in this study		
Allocation to first completions (years) ¹	6.8	Data not available
Allocation to start on site (years) ¹	5.3	
Reviewed in this study		
Outline application to start on site (years)	4.3	2.8
Build rate first year (homes per annum)	65	Not analysed separately
Build rate after first year (homes per annum) ²	110	

(1) According to earlier study by Hourigan Connelly for Gladman Developments.

(2) This rose to 120 per annum in 2013. Observed build rates in the south of England can be significantly higher.

The study indicates that, whilst many urban extensions have taken longer than four years to progress from outline application to a start on site, it appears that these timeframes have compressed more recently, to less than three years on average. This suggests that, if pre-application timeframes can be accelerated, it has become more likely that these sites can start to deliver housing within the lifetime of a five year housing land supply plan.

2. Introduction

Barratt Homes are seeking to understand the pace of delivery of large scale development in order to establish how these sites contribute to five year housing land supply and the implementation of development plans. This report will be used as evidence for planning applications and Development Plan submissions.

The report references a study by Hourigan Connolly on behalf of Gladman Developments Limited, *A Report into the Delivery of Urban Extensions*, published in February 2014, to provide case studies of sites of over 500 units that have been brought forward in the last 25 years. These case studies have been analysed to determine the timescales involved for these sites to progress through the planning system and start on site, and thereafter the rate at which housing units are delivered.

2.1. Methodology

The Gladman study was supported by evidence provided by local authorities on 78 sites via a site specific proforma. We have updated the study by reviewing recent planning activity recorded by Glenigan, adding in a further six sites for which an application has been made since 2010. All sites in the sample are urban extensions, predominantly on greenfield land. For the most part, the responses did not include sites on previously developed land which may require extensive remediation before houses are completed, new settlements which may require significant infrastructure work, or sites which have received government funding.

The regional spread of the sites is as follows:

Region	Number of Sites
South East	27
South West	12
East of England	6
East Midlands	14
West Midlands	5
Yorkshire and Humber	6
North East	1
Scotland	11
Wales	2

Of the sites in the sample, 64% are under construction, 6% have been built out, and 30% are yet to commence on site.

This data has been analysed in two stages. Firstly, we have examined how long it takes for a site to progress through each stage of the planning system, from the submission of an outline application to beginning construction of the first housing units, and sought to establish whether the size or location of the site influences this process.

The second part of the study examines the rate of delivery of units once construction has started, assesses how many units are deliverable from these sites per annum, and investigates the relationship between delivery and housing market strength.

3. The Planning Process

To establish the length of time for a site to progress through planning, we have broken down the process into 5 stages: submission of outline application to resolution to grant, negotiation of section 106 leading to the grant of outline permission, preparation of first reserved matters application, consideration of reserved matters application, and discharging the pre commencement conditions prior to the start on the first housing units. This study does not account for time spent on pre application discussions.

We have used the dates provided for each stage in the site proforma, supplemented by data from Glenigan Planning Database and local authority planning archives to establish when applications were submitted and determined for each site, and calculated the time period between each month. Taking the median time period for each stage indicates that **commencement on the first phase of housing delivery is likely to be in the fifth year following the submission of the outline application**. This is shorter timescale than the seven years detailed in the Gladman report, which accounts for additional stages, such as the preparation of the outline application (1 year) and the period between starting on site and delivering the first residential units (1.5 years). We do not have data covering these stages so have relied on the elapsed times of the schemes in question.

Table 1 – Median time taken from submission of outline application to start on site

	Year 1				Year 2				Year 3				Year 4				Year 5
	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1
Outline Application Consideration																	
Section 106 Negotiations																	
Preparation of 1 st Reserved Matters Application																	
Reserved Matters Consideration																	
Site Preparation including discharging pre commencement conditions																	
Start on Site (Housing)																	

Source: Savills using data from Gladman, Hourigan Connolly, Glenigan and local authorities

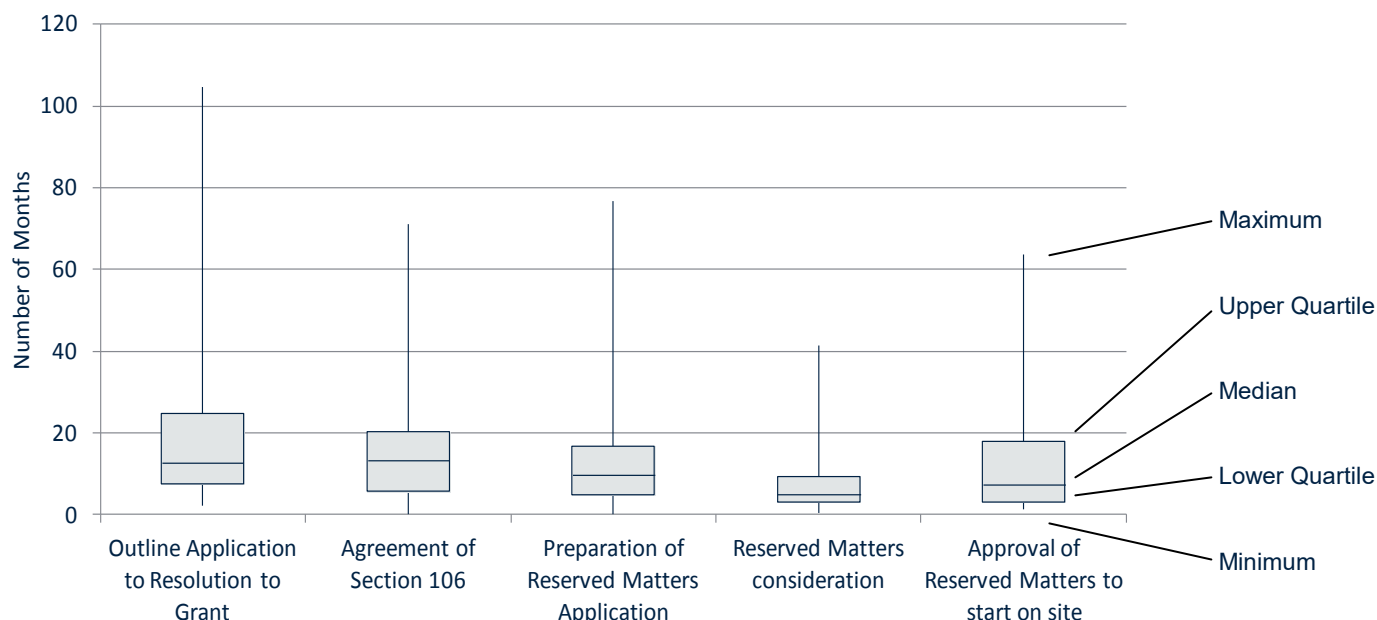
Urban Extensions

Assessment of Delivery Rates



Within the sample however, there are significant variations from this timescale. Figure 1 shows the maximum, minimum, median and lower and upper quartiles of the time taken to progress through each stage.

Figure 1 – Range of timescales for urban extensions to pass through planning process



Source: Gladman & Hourigan Connolly

There are outliers over long time periods at each stage of the process, which highlights the complexity of bringing this type of site forward. The **median time for a site to gain a resolution to grant permission is just over one year**, but the sample also includes eight sites which took over 3 years to reach the same stage. Within each category there are also sites which are yet to reach the end of that stage. Among these sites are Bronham Road in Bedford, Ladygrove East in South Oxfordshire and Shawfair in Midlothian. All these sites are at the Agreement of Section 106 stage, having gained a resolution to grant in 2003, 2005 and 2006 respectively. The amount of time taken to agree the Section 106 or Section 75 agreement on these sites has already far exceeded the current maximum in the sample of 71 months, likely due to the changing housing market affecting viability following the economic downturn in 2008.

Each site has unique circumstances that may hamper its progress, from local opposition, statutory challenges, a call in for determination by central government, to the strength of local housing market. This can be simply due to the complexity of the application, as the size of these schemes often means there are multiple development partners involved. At Cranbrook in Devon, the Section 106 took over 64 months to agree, well above the median time of 14 months, as multi-agency agreements and clawback clauses, combined with difficult market conditions caused significant delay. Initial delays can also result in further complications; Outline Permission was granted in 1991 for the 660 unit site at Branston, East Staffordshire, and although several reserved matters applications were approved between 1994 and 2004, only 50 units were ever built. The site was sold in 2010, and rather than continue to submit reserved matters applications for the 1991 permission, the new developer instead submitted a revised outline application to reflect the changed housing market conditions in October 2011. The new application has progressed much more quickly, gaining Outline Permission in 2013.

3.1. Infrastructure Requirements

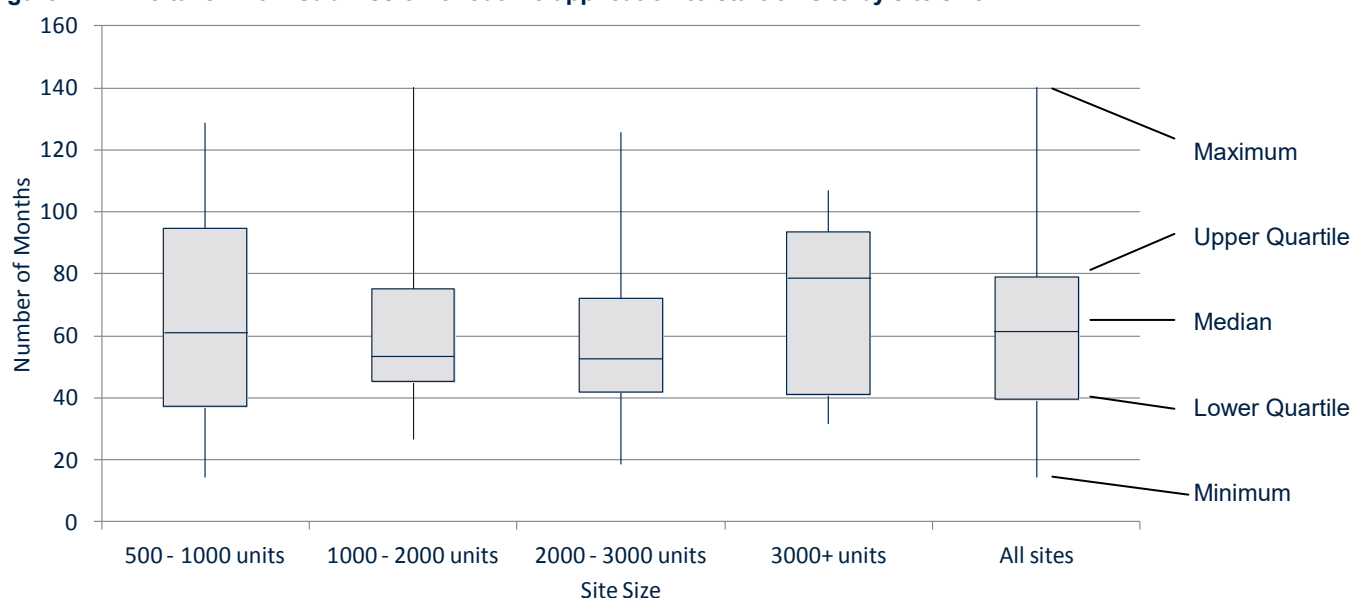
A recurring hindrance to quick progress is the provision of infrastructure. This tends to slow down the delivery of urban extensions at two key points, firstly in agreeing the Section 106, and secondly between approval of reserved matters and starting on the first housing units. It took three years for the Section 106 for the 1,284 unit site at Sharp Lane, Leeds to be agreed, as it was complicated by requirement for off-site highway works.

The timing of the infrastructure works is also key. Where is it planned to be delivered in line with the phasing of housing delivery, the potential for problems is limited. At Hunts Grove, Gloucester, major off-site works have been scheduled in line with delivery of later phases, allowing construction to start on housing four years after the submission of the outline application, and the site to deliver 400 units since construction started in 2010. However, if the infrastructure works are not phased alongside the housing delivery, it can pose problems; the site at Melton Road, Rushcliffe made smooth progress through the planning system. The outline permission was granted a year after submission, and approval of the first reserved matters application followed 18 months later. Three years later however, construction is yet to start on site as major off site infrastructure is still required. Similarly, the North Colchester urban extension gained a resolution to grant subject to the agreement of the Section 106 in September 2013, but improvements to the Northern Access road are required before development can get underway and consequently timescales for the submission of reserved matters and subsequent delivery of housing is undetermined at present.

3.2. Site Size

There is little correlation between the size of the urban extension and how long it takes to progress through the planning process. **The median for 3000+ unit sites is slightly higher at 79 months compared to 50 – 60 months for the other size bands.** However, the maximum time taken for the 3000+ unit sites is lower than the maximum in all other site size bands. .

Figure 2 – Time taken from submission of outline application to start on site by site size



Source: Gladman & Hourigan Connolly

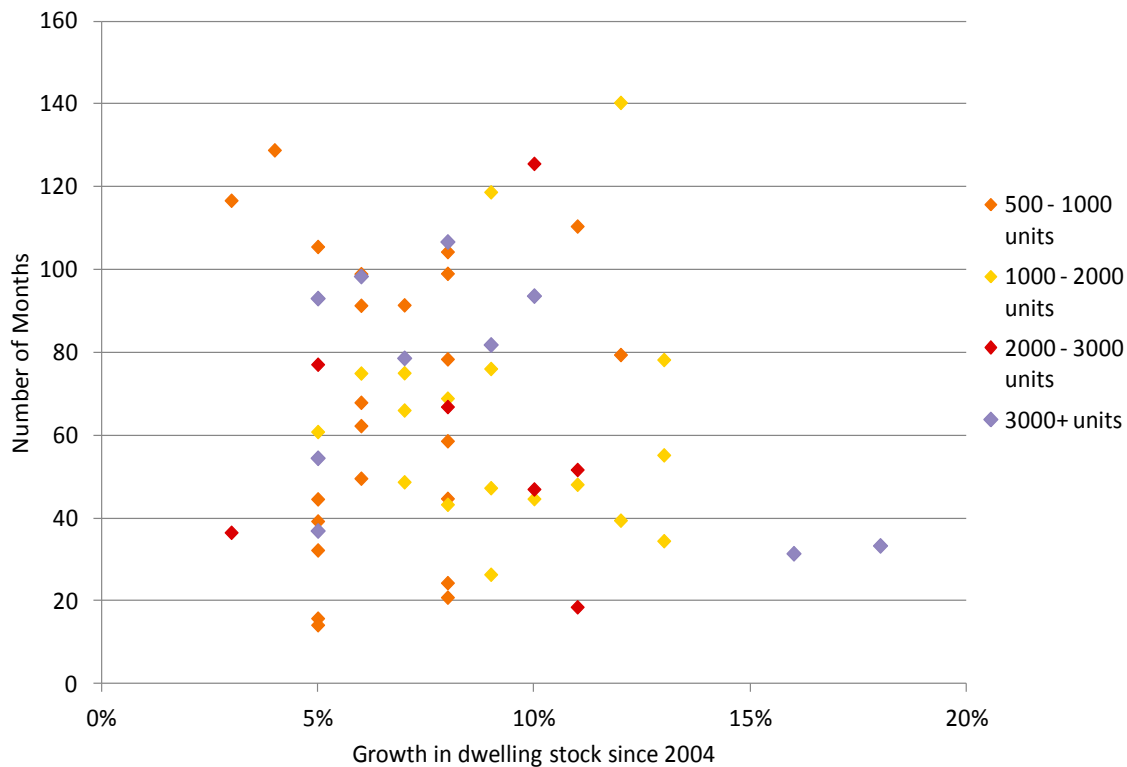
Urban Extensions

Assessment of Delivery Rates



There is however some indication that sites are more likely to progress quickly through the system in local authorities with high housing growth. Plotting the total time taken for construction to begin from the submission of an outline application against the increase in dwelling stock in each local authority over the last decade shows rapid progression of sites of over 3000 units in the established growth areas of Milton Keynes and Corby.

Figure 3 – Time taken from submission of outline application to start on site by authority delivery rates



Source: Savills using DCLG, Scottish Neighbourhood Statistics, Gladman & Hourigan Connolly

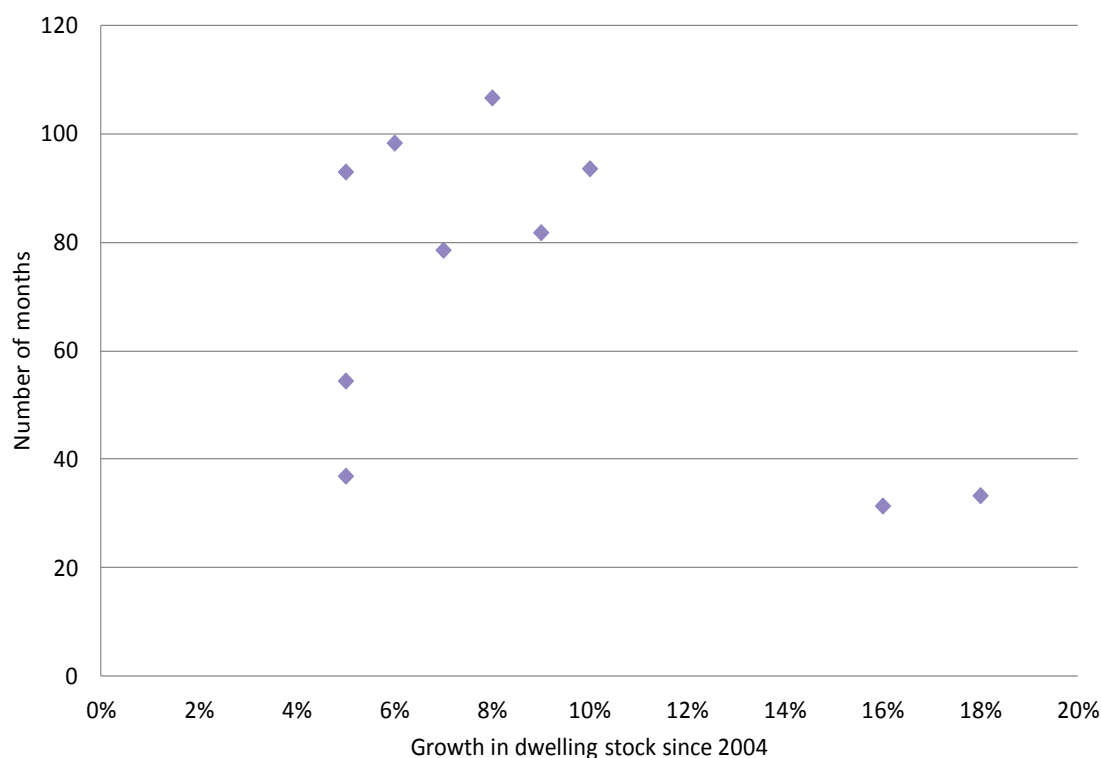
Urban Extensions

Assessment of Delivery Rates



In these two local authorities, which have respectively seen a 16% and 18% growth in dwellings since 2004, construction began within three years of an outline application being submitted. Conversely in the local authorities which have seen less than 10% growth, all but two of the 3000+ unit sites took longer than the 5 year average outlined in Table 1.

Figure 4 – Time taken from submission of outline application to start on site by authority delivery rates: 3000+ unit sites



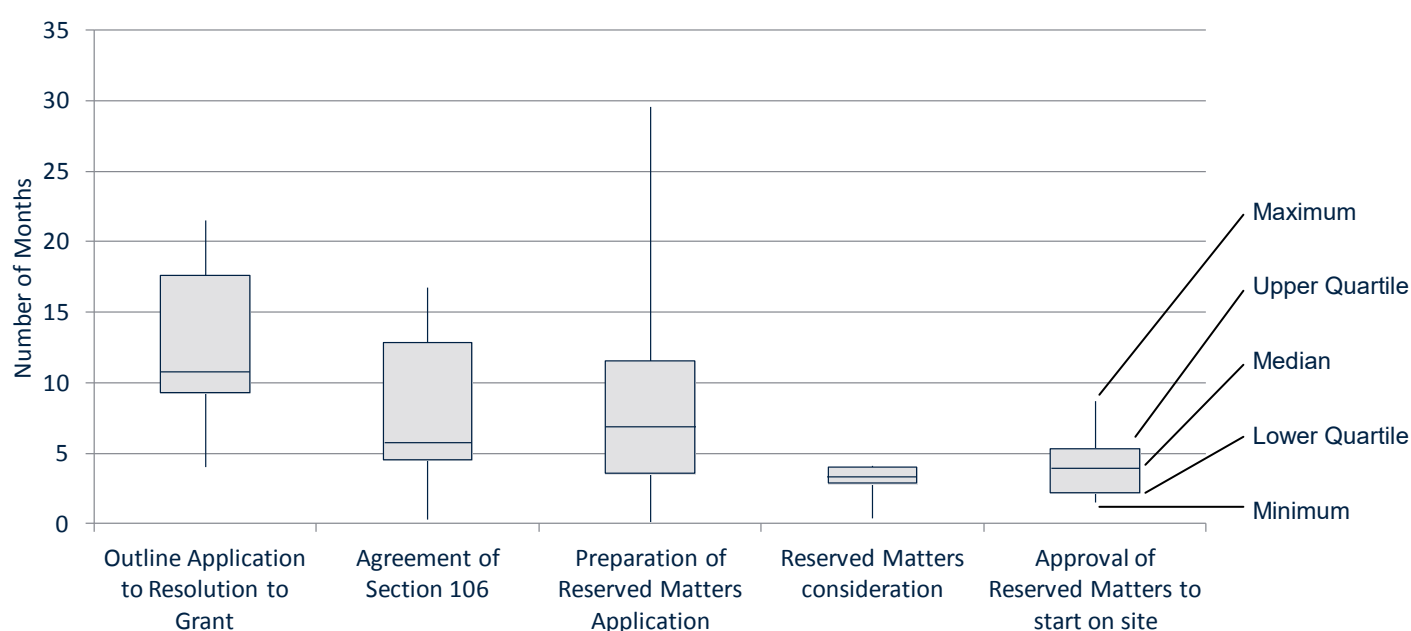
Source: Savills using DCLG, Scottish Neighbourhood Statistics, Gladman & Hourigan Connolly

The rapid progress of these sites through the planning process in local authorities which were already delivering high numbers of new dwellings suggests that the appetite for development and resource for dealing with major applications within the local authority plays just as important role in bringing forward urban extensions as the characteristics of the site itself. Corby and Milton Keynes were both recipients of funding through the 2003 Sustainable Communities Plan, which included grants totalling £350 million across the country for Planning Delivery, enabling them to progress major development sites more rapidly.

3.3. Recent Trends

The sites sampled in Gladman's report have come forward over a thirty year period, reflecting a variety of market conditions. To gain a clearer understanding of the progression of urban extension sites in the current climate, we have identified 24 sites for which an outline application was submitted after 2010, 18 of which were identified in the original Gladman report. Compared with the overall sample, these sites have progressed much more quickly, taking an **average of 33 months from the submission of the outline application to start on site, against the average of the whole sample of 60 months.** This suggests that it has become more likely that large sites will progress through the planning system quickly enough to begin delivering housing units within the lifetime of a five year housing land supply plan.

Figure 5 – Progression of urban extension applications submitted since 2010

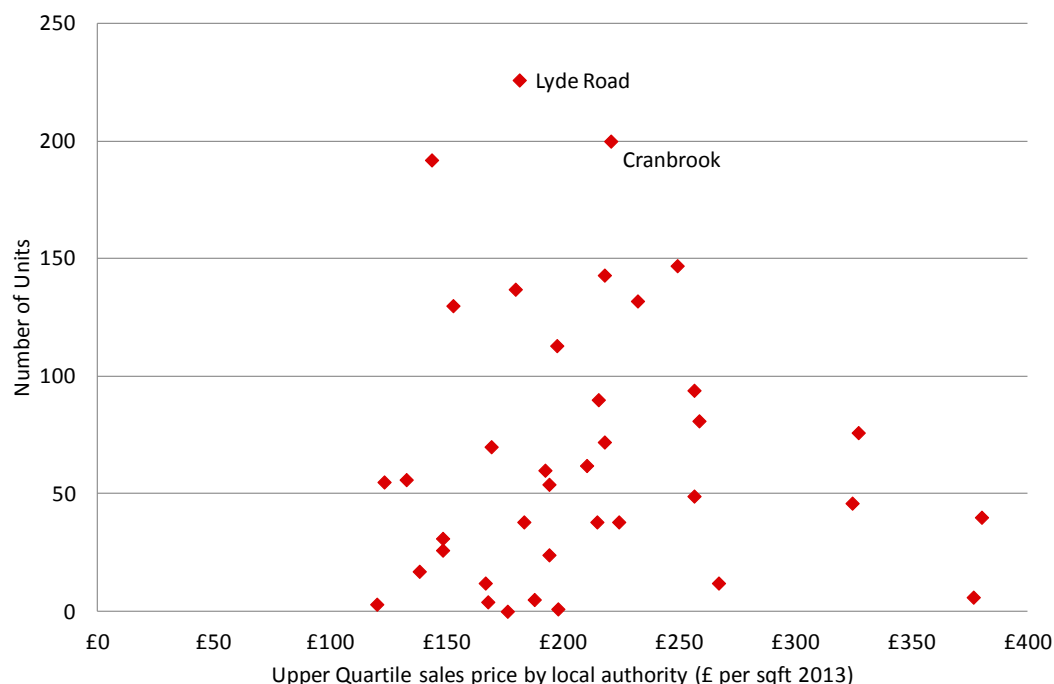


Source: Savills plus Gladman & Hourigan Connolly

4. Housing Delivery Rates

The site proforma in the Gladman study detail the number of units delivered per annum on sites where construction has started. Data is provided for 43 sites. **On average, sites delivered 65 units in the first year of construction**, although again there is a wide variation in the numbers delivered.

Figure 6 – Delivery of housing in the first year of construction



Source: Savills using Hometrack, Gladman & Hourigan Connolly

The sites which delivered high numbers in the first year generally did so due to their funding arrangements. The Lyde Road site in Yeovil which delivered 226 units had a high completion rate as the majority of the units were affordable homes and had to be completed within that financial year as a condition of government funding. The second highest delivery in the first year of construction was 200 units at Cranbrook in Devon. This site benefitted from strategic restrictions on development elsewhere in the borough, creating a positive climate for investment in the scheme, and competition between multiple developers on the site has led to high build rates.

After the first year of completions, the number of houses delivered by a site **rises to an average of 110 units, and remains at or above that level until year six of delivery**. After that point, delivery rates on sites in the 500 – 1000 unit band taper as they near completion. We do not have sufficient data to comment on delivery rates on larger sites in the later years of development.

Urban Extensions

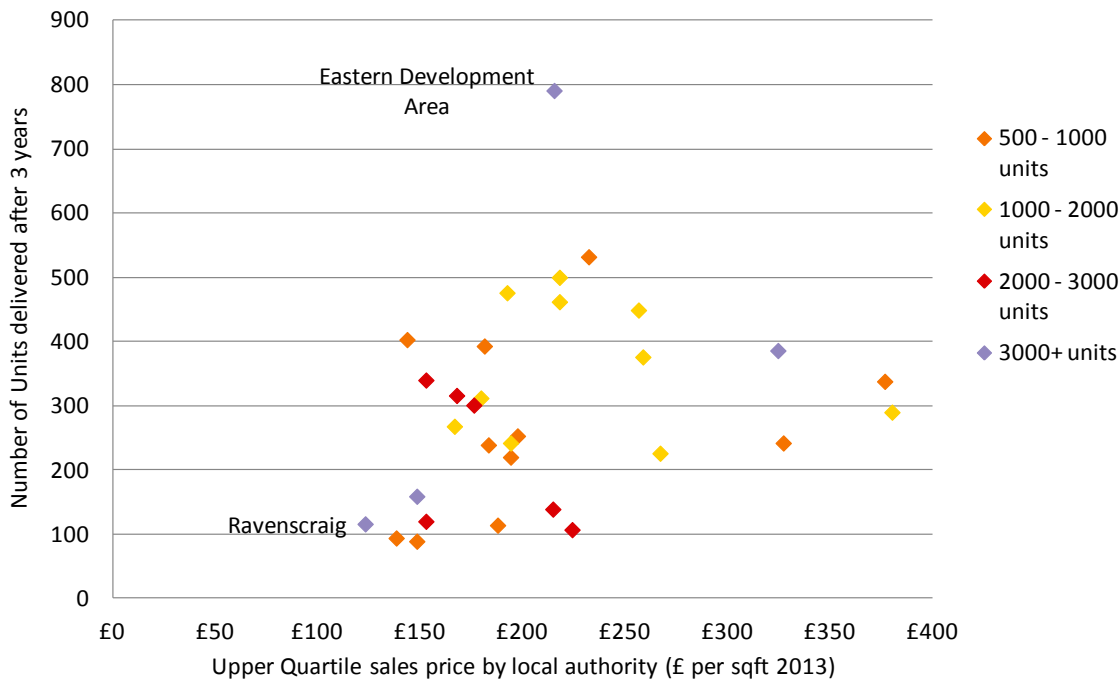
Assessment of Delivery Rates



4.1. Housing Market Strength

To study the relationship between delivery rates and housing market strength, we have plotted the number of units delivered three years after construction commenced against Hometrack house price data for the site's local authority.

Figure 7 – Impact of site size and housing market strength on rates of delivery in three years following start on site



Source: Savills using Hometrack, Gladman & Hourigan Connolly

This demonstrates that sites that struggle to deliver at high volumes tend to be in lower value areas. Every site that had not delivered 200 units or more after three years of construction is located in a local authority where the upper quartile sales value was less than £250 per sqft in 2013.

There is no overall trend of higher levels of delivery on the larger sites. There are very high rates on Eastern Development Area at Milton Keynes (capacity 4,000 units) where 791 units were delivered after three years of construction. This is in an established growth area, and was associated with high levels of competition between multiple developers on site. However, volumes have been much lower on other sites of a similar size. Conversely, the Ravenscraig site (capacity 3,500 units) has only delivered 116 units over the same period. Factors contributing to this include a weaker housing market, with upper quartile sales values of £126 per sq ft, and only having one developer active on site.

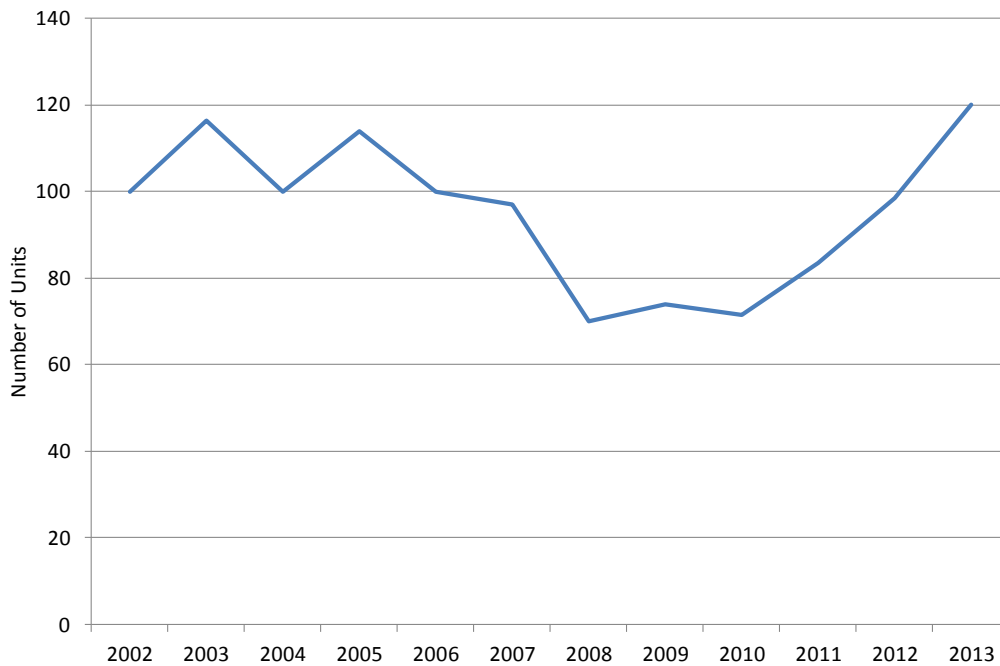
Urban Extensions

Assessment of Delivery Rates



The influence of the strength of the housing market on delivery from urban extensions is further shown by looking at the average total number of units, including affordable, delivered from the sites in the sample each year since 2002. In the years prior to the economic downturn, average delivery never dropped below 100 units a year. The weaker market from 2008 resulted in reduced delivery of fewer than 80 units a year from 2008 to 2011. As the housing market has strengthened in the last two years, delivery from the sites in the sample has increased sharply to an average of 120 units in 2013.

Figure 8 – Average annual housing delivery on urban extensions



Source: Gladman & Hourigan Connolly

At these rates, it takes a significant period to build out an urban extension to reach site capacity, but will see steady supply and high numbers of delivery, over the build out period, especially when building out in a robust housing market. The sites in the sample that have reached their first allocated capacity are:

- Cortonwood Colliery, Rotherham – 529 units, eight years from construction start, 17 years from submission of the outline application
- Former Brymbo Steelworks, Wrexham – 700 units, seven years from construction start, 17 years from the submission of the outline application
- Marks Farm, Braintree – 1000 units, twelve years from construction start, 14 years from submission of the outline application
- North East Caterton, West Oxfordshire – 1500 units, twelve years from construction start, 15 years from submission of the outline application
- Queen Elizabeth Park, Guildford – 500 units, seven years from construction start, 8 years from the submission of the outline application.

We are aware of many urban extensions in the south of England where recent delivery rates have been substantially in excess of the 120 units per annum shown in the chart for 2013.

Important Note

Finally, in accordance with our normal practice, we would state that this report is for general informative purposes only and does not constitute a formal valuation, appraisal or recommendation. It is only for the use of the persons to whom it is addressed and no responsibility can be accepted to any third party for the whole or any part of its contents. It may not be published, reproduced or quoted in part or in whole, nor may it be used as a basis for any contract, prospectus, agreement or other document without prior consent, which will not be unreasonably withheld.

Our findings are based on the assumptions given. As is customary with market studies, our findings should be regarded as valid for a limited period of time and should be subject to examination at regular intervals.

Whilst every effort has been made to ensure that the data contained in it is correct, no responsibility can be taken for omissions or erroneous data provided by a third party or due to information being unavailable or inaccessible during the research period. The estimates and conclusions contained in this report have been conscientiously prepared in the light of our experience in the property market and information that we were able to collect, but their accuracy is in no way guaranteed.