

Planning Policy Team

SENT BY EMAIL
planningpolicy@barnsley.gov.uk
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Dear Sir / Madam,

BARNSELY SPDS

The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing.

We understand Barnsley's Supplementary Planning Documents are to be used alongside the 2019 Local Plan in order to make decision on planning applications. It should be noted that PPG (ID: 61-008) states that *'Supplementary planning documents (SPDs) should build upon and provide more detailed advice or guidance on policies in an adopted local plan. As they do not form part of the development plan, they cannot introduce new planning policies into the development plan. They are however a material consideration in decision-making. They should not add unnecessarily to the financial burdens on development.'* With that in mind we would like to submit the following representations.

Affordable Housing

The HBF have concerns in relation to the approach to the tenure of affordable housing be provided whilst the text of the policy seems to suggest a level of flexibility and evidence that would be used to determine the appropriate tenure of housing to be provided based on a site by site basis, Table 1 appears to provide a more restrictive policy. Given that the SPD states that the Council intends to produce a new SHMA it seems a little in appropriate to include Table 1 into the policy. The HBF would recommend that this table is deleted.

Design of Housing Development

Internal Space Standards

Section 5 of this document relates to Internal Space Standards; the Council will be aware that the Government have introduced Nationally Described Space Standards (NDSS). The Council will also be aware that the NDSS, as introduced by Government, are intended to be optional and can only be introduced where there is a clear need and they retain development viability. As such they were introduced on a

'need to have' rather than a 'nice to have' basis. The PPG provides clear guidance in relation to these standards.

PPG (ID 56-018) states that where a local planning authority wishes to require an internal space standard, they should only do so by reference in their Local Plan to the nationally described space standard (NDSS). This SPD is not a Local Plan and it is therefore not considered lawful to introduce an internal space standard through this document. It should be noted that the newly adopted Local Plan does not make reference to minimum internal space standards nor does it make reference to the South Yorkshire Residential Design Guide.

PPG (ID 12-028) also states that SPDs *'should build upon and provide more detailed advice or guidance on the policies in the Local Plan. They should not add unnecessarily to the financial burdens on development'*. Again, it is therefore not considered appropriate for the NDSS to be a requirement of the SPD.

PPG (ID 56-020) identifies the type of evidence required to introduce a policy for internal space standards. It states that *'where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies. Local planning authorities should take account of the following areas:*

- **Need** – *evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes.*
- **Viability** – *the impact of adopting the space standard should be considered as part of a plan's viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted.*
- **Timing** – *there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions'.*

Therefore, even if the Council were to be looking to prepare a Local Plan policy to introduce this requirement, they would need robust justifiable evidence to introduce this standard, based on the criteria set out above. The HBF consider that if the Government had just expected all properties to be built to NDSS that they would have made these standards mandatory not optional.

In conclusion, the HBF strongly object to the inclusion of the Internal Space Standards from the South Yorkshire Residential Design Guide as a requirement within this SPD and recommend that any reference to an internal space standard is removed.

Hard and Soft Landscaping

The HBF have concerns in relation to the restrictive nature of paragraph 11.3, the HBF recommend that the Council do not adopt a strict 50:50 balance at the front of dwellings, adopting such a standard may have an impact on the overall layout and therefore impact on the dwelling numbers on the site and impact on the overall density (dwellings per hectare) achievable on site. When considered alongside the holistic

impact that the Draft SPD's can have on viability matters, will potential render a significant number of sites unviable.

Viability

It is considered that the Council should take into consideration any implications the requirements of these SPDs and others including the Planning Obligations, Open Space Provision, Sustainable Travel and Financial Contributions to Schools SPD may have on the viability of a development. Paragraph 34 of the NPPF (2018) established the importance of viability to ensure that development identified in the Plan should not be subject to such scale of obligations and policy burden that their ability to be delivered might be threatened.

Future Engagement

I trust that the Council will find these comments useful as it continues to progress these SPDs. I would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider house building industry. The HBF would like to be kept informed of the progress of these documents. Please use the contact details provided below for future correspondence.

Yours sincerely,



Joanne Harding

Local Plans Manager – North

Email: joanne.harding@hbf.co.uk

Phone: 07972 774 229