

Jones Homes (Yorkshire) Ltd

Land South of Bloomhouse Lane, Darton, Barnsley

Five Year Housing Supply Assessment

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1. Introduction and Background

Spawforths have been instructed by Jones Homes to prepare an Assessment of the Five Year Housing Supply within Barnsley, to support a full planning application for the erection of approximately 214 dwellings on land north of Station Road and South of Bloomhouse Lane, Darton, Barnsley

The Council has recently confirmed that it does not have a five year supply in the Barnsley Five Year 'Deliverable' Housing Land Supply Report April 2014-March 2019 (March 2016).

Barnsley's Local Plan was submitted to the Secretary of State for Communities and Local Government on the 23rd December 2016. The submitted Local Plan Publication consultation document provides an indication of a new housing land supply target for Barnsley with 'at least' 20,900 net additional homes required during the period of 2014-2033. This provides an annual average delivery target of 1,100 per annum.

The adopted Core Strategy (September 2011) sets out a housing land supply target of 21,500 net additional homes required during the period of 2008-2026 with a 'soft start' approach as set out in the Core Strategy Housing Trajectory. The average rate of supply across the Core Strategy period would be 1,194 per annum.

Core Strategy Net Housing Requirement 2008-2026	Core Strategy Annual Net Housing Requirement	Local Plan Publication Net Housing Requirement 2014-2033	Local Plan Publication Annual Net Housing Requirement
21,500 (18 years)	1,194	20,900 (19 years)	1,100

The latest housing supply report was prepared in March 2016 which considers the five year supply from April 2014 to March 2019. The start point of April 2014 is over three years ago. It is therefore important to now revisit the five year supply in order to secure an up-to-date and robust evidence base in respect of the housing supply position in Barnsley as of 1st April 2017.

This document provides evidence to demonstrate and reaffirm that Barnsley Metropolitan Borough Council (BMBC) does not have a five year supply of available housing land.

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2. Policy Context and Key Decisions

2.1. National Policy Context

National planning policy is (aside from PPS10 relating to Waste Management) contained exclusively within the National Planning Policy Framework (hereafter referred to as the Framework), which was published on 27th March 2012.

The Framework has now replaced existing Planning Policy Guidance Notes and Planning Policy Statements with a single document to set out the approach to planning at a national level. The Framework has been subject to extensive consultation and is a key material consideration as the statement of national policy and should therefore be taken into account and given appropriate weight when assessing this application.

The Framework, as adopted national planning policy, confirms the presumption in favour of sustainable development and the Government's key objective to increase significantly the delivery of new homes. Where relevant policies are out of date, for example where a five year housing land supply cannot be demonstrated, paragraph 14 of the Framework states that:

"planning permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole."

Part 6 of the Framework confirms the Government's commitment to significantly boost the supply of housing and paragraph 47 states that:

"Local planning authorities should:

- Use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far*

as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period;

- Identify and update annually a supply of specific deliverable¹¹ sites sufficient to provide five years' worth of housing against their housing requirement with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land;
- Identify a supply of specific, developable¹² sites or broad locations of growth, for years 6-10 and, where possible, for years 11-15;
- For market and affordable housing, illustrate the expected rate of housing delivery through a trajectory for the plan period and set out a housing implementation strategy for the full range of housing describing how they will maintain delivery of a five year supply of housing land to meet their housing target; and
- Set out their own approach to housing density to reflect local circumstances."

Footnote 11 - "To be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable. Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years, for example they will not be viable, there is no longer a demand for the type of units or sites have long term phasing plans."

Footnote 12 - "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."

Paragraph 48 of the Framework states that:

“Local planning authorities may make allowance for windfall sites in the five year land supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should be realistic having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends, and should not include residential gardens.”

Paragraph 49 of the Framework states that:

“Housing applications should be considered in the context of the presumption in favour of sustainable development. Relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five-year supply of deliverable housing sites.”

Within this context, the Framework sets out that housing policies within the development plan will be considered out of date, if a five year supply of deliverable sites cannot be demonstrated. In such an event, paragraph 14 of the Framework will apply and planning permission should be granted unless adverse impacts would “*significantly and demonstrably*” outweigh the benefits of doing so.

2.2. LGA / PAS Guidance Note “Ten Key Principles for owning your housing number – finding your objectively assessed needs” (July 2013)

On the matter of how to address previously un-met need, the Local Government Association (LGA) and the Planning Advisory Service (PAS) guidance note suggests that when dealing with previously un-met housing need, appeal decisions tend to support the approach in the Sedgefield appeal case where the local planning authority was required to make good the shortfall when calculating its five year supply rather than spreading the shortfall over the remainder of the development plan period.

2.3. National Planning Practice Guidance (6th March 2014)

The National Planning Practice Guidance (hereafter referred to as the Planning Practice Guidance) was published on 6th March 2014 and provides clarity on the operation of national planning policy.

PPG outlines that *“establishing future need for housing is not an exact science. No single approach will provide a definitive answer”*. Under the sub heading “What is the starting point for the five year housing land supply” the Planning Practice Guidance confirms that, *“where there is no robust recent assessment of full housing needs, the household projections published by the Department for Communities and Local Government should be used as the starting point”*

Nonetheless, PPG goes on to state that household projections are trend based and, *“do not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behavior.”*

Significantly, the Planning Practice Guidance cautions that:

“The household projection-based estimate of housing need may require adjustment to reflect factors affecting local demography and household formation rates which are not captured in past trends. For example, formation rates may have been suppressed historically by under-supply and worsening affordability of housing. As household projections do not reflect unmet housing need, local planning authorities should take a view based on available evidence of the extent to which household formation rates are or have been constrained by supply.” (Last updated: 06 03 2014 Reference ID: 2a-015-20140306)

PPG outlines that *“wherever possible, local needs assessments should be informed by the latest available information. The National Planning Policy Framework is clear that Local Plans should be kept up-to-date”*.

The Planning Practice Guidance echoes the view expressed in the LGA / PAS Guidance Note and suggests that, *“Local planning authorities should aim to deal with any undersupply within the first 5 years of the plan period where possible”* (Revision date: 06 03 2014 Related policy

National Planning Policy Framework Paragraph 47 Paragraph: 036 Reference ID: 3-036-20140306).

2.4. The Yorkshire and Humber Regional Spatial Strategy

The Yorkshire and Humber Plan Regional Spatial Strategy (RS) to 2026 was adopted in May 2008 and set out a net requirement for Barnsley of 1,015 dwellings per annum from March 2008 onwards. The Yorkshire and Humber RS was revoked on 22nd February 2013.

2.5. Local Development Plan Context

The statutory Development Plan for Barnsley comprises the Barnsley Core Strategy (2011) and the remaining saved planning policies in the Barnsley Unitary Development Plan (UDP) (2000), including the Proposals Map.

Section 38 of the Planning and Compulsory Purchase Act 2004, states that applications should be determined in accordance with the development plan unless material considerations indicate otherwise.

Policies relating to the supply and delivery of new housing across the Borough are contained within the Core Strategy, which was adopted in September 2011. The document addresses the strategic housing requirements for the Borough over the period 2008 to 2026. The Core Strategy identifies a need for 21,500 new homes in Barnsley up to 2026. Core Strategy Policy CS9 includes a requirement for 21,514 net new homes over the plan period from 2008/09 to 2024/26. As the plan period progresses the trajectory is updated with actual completion data.

It is within Urban Barnsley as a whole where most development should take place. Approximately 90% of this total is direct to Urban Barnsley which includes Darton. Urban Barnsley including Darton is identified as providing 9,800 new homes or 46% of the total supply. It is confirmed that the housing figures are indicative and therefore consideration is given to contribution to the overall supply.

The Core Strategy states:

"The Core Strategy policy CSP8 prioritises Urban Barnsley for development and identifies it as the main focus for housing, employment, shopping, health, leisure, business and public services in the region. CSP10 anticipates 9800 new homes for Urban Barnsley over the plan period. These homes will be distributed amongst the towns neighbourhoods using greenfield and previously developed safeguarded sites in proximity to good bus services. They will respect established neighbourhood character and integrate new development into networks of greenspace incorporating cycleways and footpaths.

The opportunities for significant new housing in Darton afforded by the former colliery and other greenfield safeguarded sites will be fully explored as will those prompted by the soon to be redundant Kingstone and Priory (Lundwood) school sites. The potential opportunities in Dodworth will also be explored taking advantage of local employment opportunities and the railway station."

Policy CS8: The Location of Growth indicates that priority for housing development will be given to Urban Barnsley which includes Darton.

Policy CS9 states:

"CSP 9: The Number of New Homes to be Built

We will seek to achieve the completion of at least 21500 net additional homes during the period 2008 to 2026.

A minimum five year supply of deliverable sites will be maintained."

The Core Strategy identifies a 'soft start' to housing provision to reflect, "difficulties of the housing market due to the global recession which began in 2009-10 and recognising that it will probably take at least until 2014 to recover and start to grow."

The Core Strategy indicates that the rate of delivery would be 800 net additional units in 2011/12, rising to 862 units in 2012/13 and 996 units in 2013/14. It would then rise further in subsequent years from 1,125 to 1,476 and then for the remainder of the plan period ramp

up to 1,450 net units per annum 2019-2026. This represents a significant net rate of increase in supply and delivery at a rate far in excess of anything that has been delivered in Barnsley before.

The Core Strategy was adopted in 2011, prior to publication of the Framework which indicated that plans adopted post-2004 would be afforded weight in spite of any limited conflict with the Framework. Paragraph 215 of the Framework applies in respect of the statutory plan, stating that, “*due weight should be given to relevant policies in existing plans according to their degree of consistency with this framework*”.

In the context of the five year supply of housing sites therefore, the statutory Development Plan, via the Core Strategy, establishes that Barnsley Metropolitan Borough Council should identify sufficient sites to provide for an additional 21,500 dwellings. Notwithstanding the indicative trajectory identified in the adopted Core Strategy, this provides an average annual net requirement of 1,194 units.

The Planning Practice Guidance indicates that any shortfall in provision over this period would also need to be addressed within the first five years.

This plan period commenced in March 2011 and hence has now been in place for more than six years since adoption of the Core Strategy. As the Core Strategy was adopted prior to the publication of the Framework, it was not subject to a review of its compliance with national planning policy contained therein.

In addition, paragraph 158 of the Framework requires local plans to be based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area.

2.6. Draft Barnsley Local Plan, November 2014

The Core Strategy was adopted in 2011. However, whilst the Council commenced with a Sites & Places DPD, it has now moved to produce a new composite Local Plan. The document was submitted to the Secretary of State for Communities and Local Government on the 23rd December 2016. The Examination in Public commenced on the 16th May 2017 and is due to close on the 13th October 2017. Adoption of the Barnsley Local Plan is expected in Spring 2018.

The document seeks to identify sufficient sites to meet Barnsley's housing needs in the period 2014 to 2033. Policy H1 indicates that:

"We will seek to achieve the completion of at least 20,900 net additional homes during the period 2014 to 2033. A minimum five year supply of deliverable sites will be maintained."

It is indicated that this provides an "indicative annualised figure of 1100 [units] per annum" which is suggested meet the Strategic Housing Market Assessment target of 'around' 1,100 units per annum which includes some flexibility to deal with any issues that may arise from market signals.

2.7. Barnsley Housing Strategy 2014-2033

The document was published in August 2014. It indicates that housing demand exceeds supply across all sub-areas of Barnsley with shortfalls in detached and semi-detached housing but a sufficient supply of terraced housing and flats. Also, "there are shortfalls of all property sizes and limited choice in some areas particularly larger family properties and executive housing."

It indicates that in the period 2008-2012 [inclusive], approximately 4,000 new homes have been completed across Barnsley. It states that:

"Based on recent evidence, the projected housing growth is likely to be over 20,000 new homes and probably more like 25,000 over the period of this Housing Strategy (2014-2033)."

These housing targets are aligned to future housing developments including trends relating to housing growth, household aspirations together with the need for affordable housing.

In the future, the Council aims to diversify the housing offer by encouraging the development of larger family housing and a higher value offer but also delivering a range of tenures including longer term private rented options and products to enable access into homeownership."

2.8. Growing Barnsley's Economy 2012-2033

This report was produced for the Council and approved by Cabinet on 6 June 2012. The report sets out proposals for economic growth linked in part to the Economic Investment Plan (2012/3-2016/7). The report was produced after adoption of the Core Strategy in 2011. The report states that *"Housing plays a key role in both stimulating and supporting economic growth"*. It notes the need for greater housing mix and *"increasing the breadth of housing supply"*. It refers to a need in the Sites and Places DPD for the Council to work with private developers to achieve the requisite housing mix to meet the future housing needs of the Borough. It suggests that this may include a review of the Green Belt (this has indeed been subsequently undertaken).

3. Housing Land Requirement

In this section the housing requirement for Barnsley MBC is identified over the period 1st April 2011 to 31st March 2017, against which the five year housing land supply must be measured.

The Yorkshire and Humber Plan Regional Spatial Strategy (RS) to 2026 was adopted in May 2008 and set out a net requirement for Barnsley of 1,015 dwellings per annum. The Yorkshire and Humber RS was revoked on 22nd February 2013.

The average annual requirement expressed in the Barnsley Core Strategy for net additional dwellings is based on an overall requirement of 21,500 units from 2008 to 2026 which equates to 1,194 dwellings per annum. The Core Strategy indicated a 'soft start' to reflect economic conditions and allow for additional delivery in later years of the Plan Period when delivery in earlier years of the plan are below those forecasted. However, this was considered to be imprecise by the North Gawber appeal Inspector as it was not conducive to meeting the growth requirements of Barnsley, as expressed in the Economic Growth Strategy.

In the identified Plan period to date (2008-2017) against the original RSS target, there is a net cumulative shortfall of 2,188 dwellings. The Council has failed to meet the required target in any of the given years during this period.

The Core Strategy 'soft start' approach outlined in the original Core Strategy Housing Trajectory does not take account of actual demolitions. We have updated the Housing Trajectory with the actual number of demolitions from 2008-2017 to demonstrate the actual annual net requirement based on the Core Strategy Housing Trajectory. We have called this the Updated Core Strategy 'soft start' Housing Trajectory (based on actual demolitions). The Original Core Strategy Trajectory Net Requirement has been used before considering the actual demolitions and not the Updated Housing Trajectory from the Barnsley Five Year 'Deliverable' Housing Land Supply Report: April 2014 – March 2019 (March 2016).

Projected demolitions for the 2008-2017 period were 1,079 but the number of actual demolitions were 924 which has resulted in the annual net requirement for 2008-2017 to be 157 additional dwellings than the Original Core Strategy Housing Trajectory. This is illustrated in Graph I and Table I.

Graph I - Projected Demolitions against Actual Demolitions (1st April 2008 – 31st March 2017)

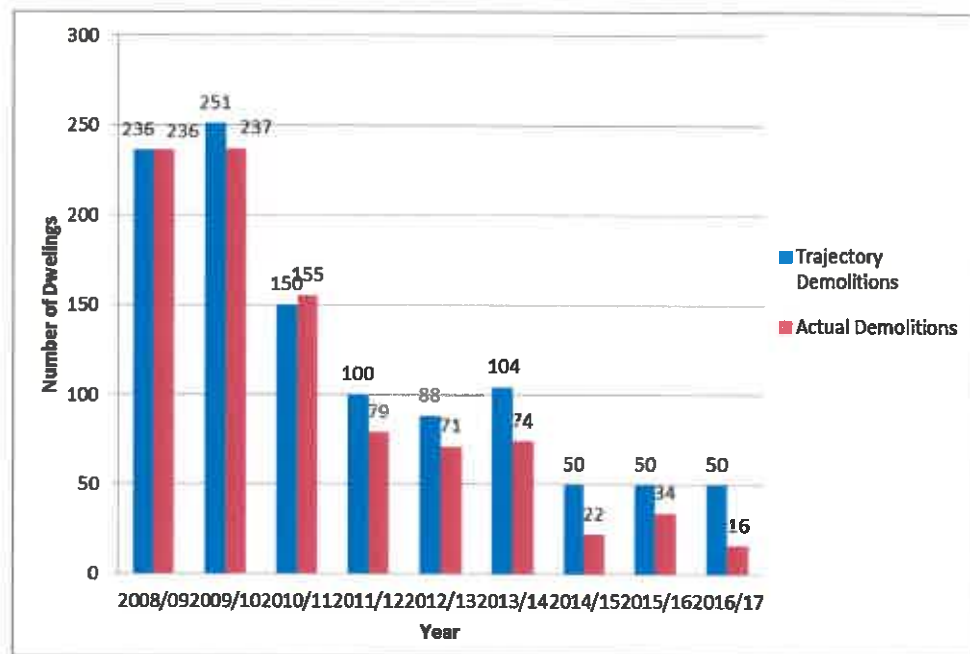


Table I - Barnsley MBC Updated Core Strategy Housing Trajectory (1st April 2008 – 31st March 2017)

	Original CS Gross Trajectory Requirement (2008)	Original CS Net Trajectory Requirements	Actual Demolitions (difference with projected demolitions)	Updated Net Requirements (CS Gross Trajectory – Actual Demolitions)
08/09	1,096	860	236 (0)	860
09/10	797	546	237 (-14)	560
10/11	850	700	155 (+5)	695
11/12	900	800	79 (-21)	821
12/13	950	862	71 (-17)	879
13/14	1,100	996	74 (-30)	1,026
14/15	1,150	1,100	22 (-28)	1,128

	Original CS Gross Trajectory Requirement (2008)	Original CS Net Trajectory Requirements	Actual Demolitions (difference with projected demolitions)	Updated Net Requirements (CS Gross Trajectory – Actual Demolitions)
15/16	1,250	1,200	34 (-14)	1,216
16/17	1,450	1,400	16 (-34)	1,434
Total	9,543	8,462	924 (-153)	8,619

Against the Updated Core Strategy 'soft start' Housing Trajectory (based on actual demolitions), the Council has undersupplied since 2008 by 1,799 net dwellings (see Table 2) including a significant undersupply in 2012-17 of 2,097 units.

Table 2 - Barnsley MBC Housing Delivery / Undersupply in Last 9 Years (1st April 2008 – 31st March 2017) against Updated Core Strategy 'soft start' Housing Trajectory (based on actual demolitions).

	Gross Completions	Actual Demolitions	Net Completions	Updated Core Strategy 'soft start' Housing Trajectory (based on actual demolitions)	Difference between updated net requirement and net completion
08/09	1,076	236	840	860	-20
09/10	793	237	556	560	-4
10/11	1,153	155	998	695	+303
11/12	919	79	840	821	+19
12/13	728	71	657	879	-222
13/14	821	74	747	1,026	-279
14/15	644	22	622	1,128	-506
15/16	738	34	704	1,216	-512
16/17	872	16	856	1,434	-578
Total	9,543	924	8,620	8,619	-1,799

From 2008, this is skewed by the Council's stated significant 'oversupply' of 303 units (998 units against an updated trajectory target of 695 units) in 2010/11. If this is read against the original RSS target of 1,015 units and the average annual net supply rate (see below) of 1,194 units then these results in an undersupply for that year.

The Core Strategy 'soft start' trajectory and approach allows for additional delivery in later years of the Plan Period when delivery in earlier years of the plan fell significantly below the number forecasted. We consider the additional delivery in the remaining years of the plan (up to 1,476 net dwellings in the Updated Housing Trajectory, March 2016) to be excessively high and unachievable given that the last time the Borough achieved over 1,000 net dwellings was in 2004/05 (1,305 net dwellings). Consequently, we have averaged out the net requirement for Barnsley of 21,500 units which equates to 1,194 units per annum 2008-2026.

Against this adopted average annual target, in the five years (2012-2017) preceding this assessment, there has been a net cumulative shortfall of 2,384 dwellings with significant undersupply in each of the years. This is shown in Graph 2 and Table 3.

Graph 2 - Dwellings Delivered Against Average Annual Supply Requirement (1st April 2012 – 31st March 2017)

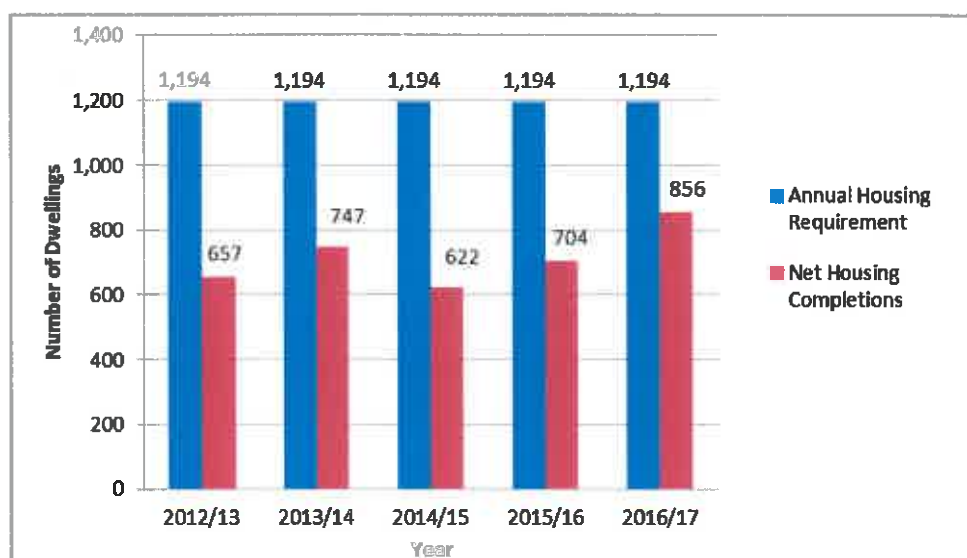


Table 3 - Barnsley MBC Housing Delivery / Undersupply in Last 5 Years (1st April 2012 – 31st March 2017)

	Gross Completions	Actual Demolitions	Net Completions	Net Average Annual Five Year Requirement	Difference between average annual requirement and net completion
12/13	728	71	657	1,194	-537
13/14	821	74	747	1,194	-447
14/15	644	22	622	1,194	-572
15/16	738	34	704	1,194	-490
16/17	987	16	856	1,194	-338
12-17	3,918	217	3,586	5,970	-2,384

Table 3 demonstrates that when comparing net completions with the average annual supply requirement from 1st April 2012 to 31st March 2017 the cumulative net shortfall is 2,384 dwellings or 39.9% of the 5,975 dwellings that should have been delivered during that period. An alternative way to appreciate the scale of the problem is that just 60.1% of the required homes have been delivered in the last five years.

The Council has consistently failed to meet its annual housing requirement throughout this period and has only achieved over 1,000 annual net dwellings once since 2004 in 2004/05 (1,305 net dwellings). In addition, 2008/9 at the start of the Core Strategy period yielded 840 net units and 2009/10, just 546 units. These were well below the RSS target, the Original Core Strategy 'soft start' Housing Trajectory approach, the Updated Core Strategy 'soft start' Housing Trajectory (based on actual demolitions) and the average annual supply rate. We do not include 2008-2011 in the undersupply, as it seems reasonable that in projecting forward to achieve a five year requirement the undersupply in the preceding five year period (2012-2017) rather than over a longer timescale should be considered.

Table 4 - Barnsley MBC Housing Delivery / Undersupply in Last 5 Years (1st April 2012 – 31st March 2017)

	Annual Net Completions	Original CS Net Trajectory Requirements	Updated Net Annual Requirement (based on actual demolitions)	Council's Updated Housing Trajectory (March 2016)	RSS Net Annual Requirement	Core Strategy Net Average Annual Requirement
12/13	657	862	879	657 (actual)	1,015	1,194
13/14	747	996	1,026	747 (actual)	1,015	1,194
14/15	622	1,100	1,128	1,125	1,015	1,194
15/16	704	1,200	1,216	1,225	1,015	1,194
16/17	856	1,400	1,434	1,425	1,015	1,194
Total	3,586	5,558	5,683	5,179	5,075	5,970
	Difference	-1,972	-2,097	-1,593	-1,489	-2,384

The Council's position is that it does not have a persistent pattern of undersupply and therefore a 5% buffer should be applied to future supply calculations. Table 4 indicates that the Council has not met its housing target over the last five years when compared against all available trajectory and requirement scenarios. The Council has a history of persistent undersupply and a buffer of 20% should therefore apply. This is considered further below.

3.1. The Council's Position

The Council produced its Barnsley Five Year 'Deliverable' Housing Land Supply Report April 2014 – March 2019 in March 2016, setting out its five year housing land position. The Council concluded that it could only identify a '5 Year 'Deliverable' Net Supply Total' of 4,727 dwellings against a requirement of 7,062 net additional units. This equates to a significant shortfall of shortfall of 2,335 units / an available housing land supply of 3.3 years.

There are various flaws in the Council's analysis that we have identified, the main ones being the approach to the Core Strategy Housing Trajectory and under/oversupply.

The Core Strategy 'soft start' approach outlined in the original Core Strategy Housing Trajectory does not take account of actual demolitions which are less than the projected demolitions outlined in the Core Strategy Housing Trajectory. Consequently, fewer annual

demolitions results in a higher annual net requirement for the Core Strategy Housing Trajectory. In addition, the Core Strategy 'soft start' trajectory and approach allows for additional delivery in later years of the Plan Period when delivery in earlier years of the plan are below those forecasted. We consider the additional delivery in the remaining years of the plan (up to 1,475 net dwellings in the Updated Housing Trajectory) to be excessively high and unachievable given that the last time the Borough achieved over 1,00 net dwellings was in 2004/05 (1,305 net dwellings).

With regard to under / oversupply, the Council's stated position is that there has not been a history of undersupply and a 5% buffer should be applied. The Council states within its Barnsley Five Year 'Deliverable' Housing Land Supply Report April 2014 – March 2019 in March 2016 that "over the ten year period the borough has delivered a surplus of 812 dwellings. This justifies the use of a 5% buffer". Over the current ten year period (2007 - 2017), the Council delivered 7,962 dwellings. There have been years when the Council did meet its requirement, however this relates to what target is being applied as outlined in Table 5 below. What is clear is that whichever target / requirement from 2007 to 2017 is used, the Borough has failed to deliver a sufficient dwellings.

Table 5 - Barnsley MBC Housing Delivery / Undersupply in Last 10 Years (1st April 2007 – 31st March 2017)

	Annual Net Completions	Original CS Net Trajectory Requirements	Updated Core Strategy 'soft start' Housing Trajectory (based on actual demolitions).	Council's Updated Housing Trajectory (March 2016)	RSS Net Annual Requirement	Core Strategy Net Average Annual Requirement
07/08	1,142	1,015 (RSS)	1,015 (RSS)	1,142 (actual)	1,015	1,194
08/09	840	860	860	840 (actual)	1,015	1,194
09/10	556	546	540	556 (actual)	1,015	1,194
10/11	998	700	695	998 (actual)	1,015	1,194
11/12	840	800	821	840 (actual)	1,015	1,194
12/13	657	862	879	657 (actual)	1,015	1,194
13/14	747	996	1,026	747 (actual)	1,015	1,194
14/15	622	1,100	1,128	1,125	1,015	1,194
15/16	704	1,200	1,216	1,225	1,015	1,194

	Annual Net Completions	Original CS Net Trajectory Requirements	Updated Core Strategy 'soft start' Housing Trajectory (based on actual demolitions).	Council's Updated Housing Trajectory (March 2016)	RSS Net Annual Requirement	Core Strategy Net Average Annual Requirement
16/17	856	1,400	1,434	1,425	1,015	1,194
Total	7,962	9,479	9,634	9,555	10,150	11,940
	Difference	-1,517	-1,672	-1,593	-2,188	-3,978

The Core Strategy was adopted in 2011 and the RSS revoked in 2013. Curiously the Core Strategy Inspector allowed reference (in the Core Strategy Appendix) to a trajectory that accounted for the failure to meet the RSS target, which then 'accelerated' through the plan period up to 1,450 net units later in the Plan Period (2017/8 onwards). The Updated Housing Trajectory for the remainder of the Plan Period within the 'Barnsley Five Year 'Deliverable' Housing Land Supply Report: April 2014 – March 2019' (March 2016) raised the annual requirement further to 1,476 net units in 2018/19. These rates of delivery are well above the RSS target and above anything that the Council has achieved in previous years (since 2002/3, the highest net delivery was 1,305 units in 2004/5). It is not to say that the Council should not set ambitious yet achievable targets in their quest for growth, and this is supported by the applicant, but this indicative of the history of persistent undersupply and the need for significant increased housing land supply to meet the needs of Barnsley.

Best practice indicates that it is not correct to 'back-end' the housing supply, as this simply defers the issue and creates pressure in future to simply readdress the target, rather than address the shortfall. In the North Gawber appeal, the Council's approach was criticised by the Secretary of State who concluded:

"...that the Appellant's methodology for calculating the 5 year period is to be preferred over that advocated by the Council and, in particular, given the ambitious overall target included in the CS, that there is little benefit to be gained from adopting a methodology which effectively constrains the 5 year requirement."

The Appeal Inspector indicated that there was a shortfall of 'some 500' units, and that this 'underperformance' meant that the Council's stated gross requirement was 5,251 units and

that the shortfall would need to be made up meaning a requirement of 5,760 units. The Appellant has argued that the requirement was in fact 6,688 units. Linked to this is the Inspector's further confirmation (as detailed in national policy) that any targets are 'minimum' requirements and housing targets should not be applied as a 'ceiling' figure. The appeal decision at Dunsville, Doncaster (APP/F4410/W/16/3158500) on the 12th July 2017 confirms this 'minimum' approach at paragraph 37.

The Council, in its assessment has indicated that it may have met target in three of the last five years preceding the study and, indeed, exceeded it significantly by 298 units in 2010/11 and slight increase of 10 units in 2009/10 and 40 units in 2011/12. Again, we would argue that this should actually be considered in the context of the RSS figure of 1,015 which applied at that time and would have resulted in a shortfall of some 459 units, 17 units and 265 units in the years 2009/10, 2010/11 and 2011/12 respectively. In addition Table 4 demonstrates that net completions in the last 5 years (2012-2017) were well below all targets considered which are the RSS target, the Original Core Strategy 'soft start' Housing Trajectory approach, the Updated Core Strategy 'soft start' Housing Trajectory (based on actual demolitions) and the average annual supply rate. Given that the supply figures were effectively 'retro-fitted' at the point of adoption of the Core Strategy, evidenced by the relationship to target in the years 2010/11 and 2011/12, then the 2010/11 delivery figure was clearly underestimated against the original target and should not therefore be used as an indication of healthy delivery rates in Barnsley.

The Council's use of this alleged 'oversupply' to then discount against future requirements is flawed. Moreover, as supply targets are not to be considered as a minimum, then they should not in any regard be used to discount future requirements. The appeal decision at Dunsville, Doncaster (APP/F4410/W/16/3158500) outlines that there is no specific mention of over delivery in the Framework and that exceedance of the housing requirement in one year should not be used to reduce the requirement in future years which would go against the Government's aim to significantly boost the supply of housing.

The Local Plans Expert Group report in March 2016 to the Communities Secretary and to the Minister of Housing and Planning recommended that Local Planning Authorities make provision for, and provide a mechanism for the release of, developable Reserve Sites equivalent to 20% of their housing requirement

In addition, in the three years (2014-2017) following the 'Barnsley Five Year 'Deliverable' Housing Land Supply Report: April 2014 – March 2019' (March 2016), the Council has fallen significantly short of its own 'soft start' housing trajectory, which without a significant level of provision in the short-term, can only lead to further increasingly significant shortfalls in the short-term. Against the Council's own target and net supply figures there is now a chronic and significant undersupply.

Planning Practice Guidance, which reflect the Government's emphasis on housing delivery and state that, "Local planning authorities should aim to deal with any undersupply within the first 5 years of the plan period where possible" (Revision date: 06 03 2014 Related policy National Planning Policy Framework Paragraph 47 Paragraph: 035 Reference ID: 3-035-20140306). It is our view that there is an undersupply and this needs to be added to the following 5 years supply calculations.

The latest report indicated that the Council had a net target for the next 5 years (2014/15 to 2018/19) as 6,600 units on the Councils Housing Trajectory approach. The net target rises to 6,726 net units when the 2008/09-2013/14 deficit of 126 dwellings is applied (before the requisite buffer has been applied). If the Council's position applies, then application of a 5% buffer means a target of 7,062 net units. However, if a 20% buffer is applied to address persistent undersupply, then this target would increase to 8,071 net additional units. Although neither of the aforementioned figures makes any allowance for the cumulative undersupply of units delivered in previous years (we consider this further below).

The Inspector that addressed the appeal at Sellars Farm, Hardwick, Gloucestershire¹ suggested,

"With regard to the shortfall in completions against the requirement over the period 2006-2011, there is no definitive guidance² or binding local precedent on how this should be treated. However, in view of the emphasis in Government policy on delivery, and with

¹ APP/C1625/A/11/2165865 (Inspector) Sellars Farm, Hardwick, Gloucestershire. Sedgefield approach – paragraph 15

² The Planning Practice Guidance published since this appeal decision states that, "Local planning authorities should aim to deal with any undersupply within the first 5 years of the plan period where possible" (Revision date: 06 03 2014 Related policy National Planning Policy Framework Paragraph 47 Paragraph: 036 Reference ID: 3-036-20140306).

no strong local case for rolling forward the backlog over the longer period, the shortfall should be added to the 5 year target...."

The Inspector at the Honeybourne appeal in Worcestershire³ said,

"Recent pre-NPPF decisions by the SoS expressly approved the Sedgefield approach at Andover and Moreton-in-Marsh. In my view it is inconsistent with Planning for Growth and the NPPF paragraph 47 to meet any housing shortfall by spreading it over the whole plan period. Clearly it is better to meet the shortfall sooner rather than later. Moreover, if buffers are brought forward into the first five years as in the NPPF, so should the shortfall."

The Under or Over Supply Position

It is clear that against three separate target indicators (RSS, Updated Core Strategy 'soft start' Housing Trajectory, Core Strategy average annual requirement), the Council now has an undersupply in the Core Strategy Plan period from 2008 to present. The question is whether it presents a persistent history of undersupply and warranting a 20% buffer. The appeal decision at Dunsville, Doncaster (APP/F4410/W/16/3158500) on the 12th July 2017 confirms that the Planning Practice Guidance acknowledge that the assessment of under delivery is likely to be more robust if a longer term view, such as over ten years is taken, to take account of the peaks and troughs of the housing market.

It is our view, that the Core Strategy 'soft start' approach does not present a true picture of supply against required demand. It is acknowledged that the Authority performed reasonably well in the period up to 2008, but has since faltered. The Core Strategy Housing Trajectory was identified in spite of the RSS target that was based on sound and accepted housing supply calculation principles. Applying the RSS and the Updated Core Strategy 'soft start' Housing Trajectory figures indicates a history of persistent undersupply in the period from 2008 and would warrant a buffer of 20% on future supply. Of greater relevance since revocation of the RSS is the Core Strategy's overall target, coupled with its growth requirements. In this regard, we consider that the most appropriate approach to the target

³ APP/H1840/A/12/2171339 (Inspector) Land between Station Road and Dudley Road, Honeybourne, Worcestershire. Sedgefield approach – paragraph 36

is to provide an average rate of supply across the Plan Period. As identified above, this produces an average requirement from 2008-2026 of 1,194 units. Again, when this is applied to historic supply, this presents a pattern of consistent undersupply since 2008 as shown below.

Table 6 – Barnsley MBC Housing Delivery / Undersupply from 1st April 2008 – 31st March 2017)

	Annual Net Completions	Updated Core Strategy 'soft start' Housing Trajectory (based on actual demolitions).	RSS Net Annual Requirement	Net Averaged Annual Requirement
08/09	840	860	1,015	1,194
09/10	556	560	1,015	1,194
10/11	998	695	1,015	1,194
11/12	840	821	1,015	1,194
12/13	657	829	1,015	1,194
13/14	747	1,026	1,015	1,194
14/15	622	1,128	1,015	1,194
15/16	704	1,216	1,015	1,194
16/17	856	1,434	1,015	1,194
Total	6,820	8,619	9,135	10,746
Difference to Net Completions		-2,339	-2,315	-3,926

Paragraph 47 of the Framework states that when identifying a 5-year housing land supply, local authorities should include an additional 5% buffer to ensure choice and competition in the market. The Framework further states that the buffer should be 20% where local authorities have a record of persistent under delivery of housing. The appeal decision at Dunsville, Doncaster (APP/F4410/VV/16/3158500) on the 12th July 2017 also confirmed that persistent under delivery of completions over a ten year period should require a 20% buffer to be applied to the five year requirement and any undersupply.

In this regard, and given the Council's history of persistent failure to deliver housing over 9 years, we consider that shortfall in provision should be considered and a 20% buffer should be applied.

In this context, an appeal decision ⁴ stated in paragraphs 61-62 that,

"The needs that have gone unmet in the past, remain part of the needs now. The houses that should have been built for the populous of the area still need to be built...The 20% addition is required as a reflection on the track record of under delivery. This should reflect 20% of the totality of the undersupply because it relates to the extent of development required."

In these circumstances, we consider that the 5 year housing requirement should include under delivery and that the 20% buffer should be added both to the base requirement and the undersupply, to ensure that the unmet housing needs are addressed as soon as possible.

Taking the Council's approach and adding in the shortfall for the past **three years** the total deliverable five year housing requirement for Barnsley at this time would be 7,301(1,475+1,476+1,450+1,450+1,450) + 2,053 (undersupply 1st April 2012 – 31st March 2017) + 5% buffer = **9,822 net additional dwellings (1,964 net dwellings per annum)**, which would fall to be delivered to be delivered during the Five Year Period from 1st April 2015 up to 31st March 2020.

3.2. Scenario A – Housing Requirement based on the Council's Updated Core Strategy 'Soft Start' Housing Trajectory and with 20% Buffer and Undersupply for five years (April 2012-March 2017) addressed

Scenario A applies a 20% buffer to the housing land requirement including the undersupply against the Updated Core Strategy 'soft start' Housing Trajectory target (based on actual demolitions). This approach based on the Updated Core Strategy Housing Trajectory (based

⁴ APP/V0728/A/13/2190009 (Inspector) Land west of Galley Hill Estate, Stockesley Road, Guisborough (26th September 2013)

on actual demolitions) within the 'Barnsley Five Year 'Deliverable' Housing Land Supply Report: April 2014 – March 2019' (March 2016) would create a total deliverable five year housing requirement for Barnsley at this time of 7,301(1,475+1,476+1,450+1,450+1,450) + 2,053 (undersupply 1st April 2012 – 31st March 2017) + 20% buffer = **11,225 net additional dwellings (2,245 net dwellings per annum)**, which would fall to be delivered to be delivered during the Five Year Period from 1st April 2017 up to 31st March 2022.

Table 8 – Barnsley MDC undersupply against the 'Updated Core Strategy 'soft start' Housing Trajectory target (based on actual demolitions) from 1st April 2012 – 31st March 2017

	Updated Core Strategy Net Annual Requirements (CS Gross Trajectory – Actual Demolitions)	Annual Net Completions	Difference between updated net requirement and net annual completion
12/13	879	657	-322
13/14	1,026	747	-279
14/15	1,128	622	-476
15/16	1,216	704	-496
16/17	1,434	856	-578
12-17	5,683	3,586	-2,053

3.3. **Scenario B - Housing Requirement based on the Average Annual Council Core Strategy requirement and with 5% Buffer and Undersupply addressed for five years (April 2010-March 2015)**

As we have advocated above, and as indicated by the Appeal Inspector at the North Gawber Colliery Inquiry, the Council's approach to trajectory in the Core Strategy does not address the net housing requirement as outlined in the RSS (which was relevant at the point of adoption and certainly from the base date of 2008), or the growth aspirations of Barnsley, as outlined in the Economic Growth Strategy. The Core Strategy provides a target of 21,500, which equates to an average annual requirement over the Plan Period (2008-2026) of 1,194 units.

We apply this to the housing supply calculations in the form of Scenarios B and C. There was some ambiguity over in the North Gawber Colliery appeal as to whether a 5% or 20%

buffer should apply (the Framework had not been adopted at this point and given the lack of 5 year supply, the appeal was allowed without detailed consideration of this issue).

Scenario B therefore accounts for undersupply against the average annual Core Strategy target and applies a 5% buffer. This equates to a total deliverable five year housing requirement for Barnsley at March 2017 of 5,970 ($5 \times 1,194$) + 2,384 (undersupply 31st March 2012 – 31st March 2017) + 5% buffer = **8,772 net additional dwellings (1,754 net dwellings per annum)**, which would fall to be delivered during the Five Year Period from 1st April 2017 up to 31st March 2022.

Table 9 – Barnsley MDC undersupply against the Average Annual Council Core Strategy requirement from 1st April 2012 – 31st March 2017

	Average Annual Core Strategy Net Requirement	Annual Net Completions	Difference between updated net requirement and net annual completion
12/13	1,194	657	-537
13/14	1,194	747	-447
14/15	1,194	622	-572
15/16	1,194	704	-490
16/17	1,194	856	-338
11-16	5,970	3,586	-2,384

3.4. Scenario C - Housing Requirement based on the Average Council Core Strategy requirement and with 20% Buffer and Undersupply addressed for five years (April 2011 - March 2016)

As indicated above we consider that an annual average requirement of 1,194 units should apply. We have followed the same approach as Scenario B, but add a buffer of 20% which indicates persistent under delivery.

This equates to a total deliverable five year housing requirement for Barnsley at March 2017 of 5,970 ($5 \times 1,194$) + 2,384 (undersupply 31st March 2012 – 31st March 2017) + 20% buffer = **10,025 net additional dwellings (2,008 net dwellings per annum)**, which would fall



to be delivered to be delivered during the Five Year Period from 1st April 2017 up to 31st March 2022.

Barnsley's Five Year Housing Requirement Scenarios

Five year Land Component	Council's Position based on position at March 2014 (March 2016) and last three year's data added including shortfall	Scenario A - 31st March 2017 (incorporating 2012/13-2016/17 (5 year) shortfall against Updated Core Strategy 'soft start' Housing Trajectory (based on actual demolitions) and approach advocated in Planning Practice Guidance that shortfall be addressed within first five years) (20% Buffer)	Scenario B - 31st March 2017 (incorporating 2012/13-2016/17 (5 year) shortfall against average CS target and approach advocated in Planning Practice Guidance that shortfall be addressed within first five years) (5% Buffer)	Scenario C - 31st March 2015 (incorporating 2012/13-2016/17 (5 year) shortfall and approach advocated in Planning Practice Guidance that shortfall be addressed within first five years) (20% Buffer)
Annual requirement	1,450-1,476	1,450-1,476	1,194	1,194
5 year requirement	7,301	7,301	5,970	5,970
Shortfall in delivery (2012/13-2016/17)	2,053	2,053	2,384	2,384
5 year + Shortfall	9,354	9,354	8,354	8,354
5% Buffer	468		418	
20% Buffer		1,871		1,671
Total requirement	9,822	11,225	8,772	10,025
Equivalent Annual Requirement	1,964	2,245	1,754	2,005

4. Five Year Housing Supply

4.1 Introduction

The Framework establishes that the Council should demonstrate a five year supply of deliverable housing sites, which are available now, suitable, with achievable delivery within 5 years and are viable.

The Council has confirmed that it does not have a five year supply of housing land. We concur with this position.

BMBC Housing Trajectory 2008/9-2025/6 (Reproduced from the Council's Adopted Core Strategy 2011 and adapted by Spawforths)



The Council's own Housing Trajectory above indicates an ambitious approach to housing provision with a significant rate of increase in supply requirement. The average annual rate of net delivery since 2012 is 717 units (3,586/5). If this is applied to the above trajectory it presents a significant differential between supply and demand.

If the same average rate of supply is achieved in the next 5 years, this would equate to a net supply of 3,586, significantly short of the Core Strategy (updated trajectory), Core Strategy (equalised) and Draft Barnsley Local Plan average requirements. It would certainly then

create a continued pattern of undersupply and would make no contribution to address the previous undersupply over the last five years and the resultant unmet housing needs across the Borough.

We are now in receipt of email communication from the Council which demonstrates that in the 12 months to 31st March 2017 just 856 net additional dwellings were completed.

Thus, the Council's own trajectory shows that the persistent and long-standing trend of poor performance on housing delivery in the Borough will continue and peoples' housing needs in Barnsley will continue to not be met. The Council is required to ensure the maintenance of a deliverable five-year supply of housing land.

4.2. Barnsley Council Five Year Deliverable Housing Land Supply 1st April 2014 – 31st March 2019

Barnsley's latest 5 year supply assessment considers the housing land supply position at March 2014. No further update is presently available. Accordingly, we are relying on the assumptions made by the Council in identifying its deliverable housing supply.

The Council's Five Year Deliverable Housing Land Supply to its five year housing land position. The claimed supply at 1st April 2014 is suggested to come from the following sources:

Planning permissions $\geq$ 10 Dwellings	= 2,263
Remaining UDP Housing Proposals	= 152
Redundant School Sites	= 347
Planning permissions $<$ 10 Dwellings	= 437
Additional Sites	= 958
Windfalls	= 695
5 Year 'Deliverable' Gross Supply Total	= 4,852
Predicted Losses	= 125
Total	= 4,727

The Council has indicated that it has identified a net deliverable supply of 4,727 houses in the period 2014-2019. Whilst this figure needs to be revisited, in the absence of such data and given the confirmation that the Council has failed to meet its targets in the last five years by a significant margin, the deliverable supply is unlikely at this point to be any higher than that calculated. Equally, there is insufficient evidence to suggest at this stage that the supply should be reduced further. The Council's supply figure of 4,727 units is therefore retained for the purposes of this assessment.

	Council's Position based on position at March 2014 (March 2016) and last three year's data added including shortfall.	Scenario A – 31st March 2017 (incorporating 2012/13-2016/7 (5 year) shortfall against Updated Core Strategy 'soft start' Housing Trajectory (based on actual demolitions) and approach advocated in Planning Practice Guidance that shortfall be addressed within first five years) (20% Buffer)	Scenario B – 31st March 2017 (incorporating 2012/13-2016/7 (5 year) shortfall against average CS target and approach advocated in Planning Practice Guidance that shortfall be addressed within first five years) (5% Buffer)	Scenario C – 31st March 2017 (incorporating 2012/13-2016/17 (5 year) shortfall against average CS target and approach advocated in Planning Practice Guidance that shortfall be addressed within first five years) (20% Buffer)
Total requirement	9,822	11,225	8,772	10,025
Net Supply*	4,727	4,727	4,727	4,727
% of supply	0.48	0.42	0.54	0.47
Years Supply	2.4	2.1	2.69	2.35

*Net Supply is based on the Council's latest deliverable supply calculation at March 2014

5. Summary

This document provides evidence to show that Barnsley Metropolitan Borough Council cannot demonstrate a five year supply of available housing land.

This report has sought to address the current five year housing land supply position in Barnsley. It has assessed the most relevant policy, appeal decisions and evidence base available with regard to housing supply in order to form a view on the potential of the Council to demonstrate a five year land supply at this time or at the time of an appeal decision.

The Core Strategy established a requirement for an additional 21,500 net units 2008-26, equating to an average requirement of 1,194 dwellings per annum across the plan period. This plan period commenced on 31st March 2008 and hence has been in place for nine years, six of which have elapsed since adoption. As the Core Strategy was adopted prior to the publication of the Framework, it has therefore not been subject to a review of its compliance with national planning policy expressed in the Framework.

The Draft Barnsley Local Plan sets a target of 20,900 new homes to be delivered in the period 2014-2033, which would equate to an average annual net requirement of 1,100 units per annum. However, the Draft Barnsley Local Plan is not expected to be adopted until 2018. Consequently, we have used the Core Strategy requirement to inform our analysis of the extent of Barnsley's available housing land supply.

The challenge for Barnsley is significant. To meet an average annual net requirement of 1,194 dwellings (against at draft Local Plan figure of 1,100), it is considered that 35 housing outlets (these are active housing sites which may involve one or more developers, each classified as an active sales outlet and building at a rate of up to 35 dwellings per year) will be required.

The availability of sufficient suitable sites in a choice of locations throughout the Borough is frustrating the Council's ability to achieve its housing requirement. Consequently, it is vital that the Council looks to encourage the construction of a sufficient level of housing development to provide choice in a variety of locations and certainty to the market.

5.1. Housing Requirement

As indicated above, it is clear that the Council cannot identify a 5 year deliverable supply of housing sites at the current time. The Council's own 'soft start' Core Strategy approach is proving difficult as the 'target' increases year on year and the supply remains static. This means that both the level of undersupply increases year on year, but also that the undersupply of previous years is not addressed. The net result is that the supply requirements year on year increase exponentially.

Below we set out the housing requirements, as detailed above and apply these to the net deliverable supply identified by the Council as 4,727 units. The table indicates how the Council is performing in terms of its requirement to identify a 5 year supply of deliverable sites. This is considered against the Council's position which has been updated to take account of the past three years which now provide a shortfall in supply where the Council has previously identified a surplus. The supply is also then applied to the three scenarios (A, B & C) identified above.

	Council's Position based on position at March 2014 (March 2016) and last three year's data added including shortfall.	Scenario A – 31st March 2017 (incorporating 2012/13-2016/7 (5 year) shortfall against Updated Core Strategy 'soft start' Housing Trajectory (based on actual demolitions) and approach advocated in Planning Practice Guidance that shortfall be addressed within first five years) (20% Buffer)	Scenario B – 31st March 2017 (incorporating 2012/13-2016/7 (5 year) shortfall against average CS target and approach advocated in Planning Practice Guidance that shortfall be addressed within first five years) (5% Buffer)	Scenario C – 31st March 2017 (incorporating 2012/13-2016/7 (5 year) shortfall against average CS target and approach advocated in Planning Practice Guidance that shortfall be addressed within first five years) (20% Buffer)
Total requirement	9,822	11,225	8,772	10,025
Net Supply*	4,727	4,727	4,727	4,727
% of supply	0.48	0.42	0.54	0.47
Years Supply	2.4	2.1	2.69	2.35

*Net Supply is based on the Council's latest deliverable supply calculations at March 2014

5.2. Conclusions

If the **Council's Position** (9,822 dwellings (or 1,964 dwellings per annum) in respect of its Housing Requirement is applied against the available supply (4,727 dwellings) then Barnsley would have no better than a **2.4 years supply** of housing land (this is a slight increase in the Council's stated supply position at March 2012).

If **Scenario A** with a 'soft start' (11,225 dwellings and 2,245 dwellings per annum) is applied to the Council's Housing Requirement where a 20% buffer has been applied, the identified deliverable net supply of 4,727 units would equate to no better than a **2.1 year supply** of housing land in Barnsley.

If our **Scenario B** (8,772 dwellings (4,727 dwellings per annum) is applied, then this would mean that Barnsley has no better than a **2.69 year supply** of housing land.

Finally, should our **Scenario C** (10,025 dwellings (2,005 dwellings per annum) be utilised against the available supply that would mean that Barnsley would have no better than a **2.35 year supply** of housing land.

From the results of our assessment, it is clear that there is a very substantial shortfall in the supply of available housing land in Barnsley and that unless a significant number of planning permissions are granted and subsequent delivery of sites is achieved, the Council will continue to fall further behind its housing delivery target and the deliverable housing supply will be even further reduced.

There remains a level of contention as to whether a 5% or 20% buffer should be applied. However, we sincerely believe that a 20% buffer should be applied given a number of years of persistent undersupply in the Borough. The Council's position is that annual targets were reduced in the Core Strategy to reflect a realistic level of supply and that this was not reflective of an unhealthy housing market.

However, regardless of what buffer should be applied, it is evident that Barnsley cannot demonstrate a 5 year supply of deliverable housing sites based on their approach (equating to **2.4 years supply**) and three alternative scenarios, which conclude that the extent of available supply is no better than **2.1 years' supply (Scenario A)**, **2.69 years' supply (Scenario B)** or **2.35 years' supply (Scenario C)**.

Paragraph 4.2 of the Council's Five Year Deliverable Housing Land Supply Report April 2014 – March 2019 concludes that, *"The Council cannot currently demonstrate a supply of specific, deliverable sites sufficient to meet the boroughs (sic) housing requirement. In this situation the NPPF is clear, at paragraph 49, that relevant policies for the supply of housing should not be considered up to date. As a result, applications for residential planning permission in the borough (including proposals on UDP Safeguarded Land and UDP Urban Land to Remain Undeveloped allocations), where it can be demonstrated that they are in a sustainable location, will now be determined in line with the NPPF Presumption in Favour of Sustainable Development (paragraph 14 of the NPPF), relevant development plan policies and any other material considerations."*

We agree that because the Council is unable to demonstrate a five year supply of housing land, its housing policies as outlined in the Core Strategy are out-of-date and the presumption in favour of sustainable development in paragraph 14 of the Framework and the 'weighted balance' is triggered. Consequently, planning permission should be granted for the application proposals unless adverse impacts would *"significantly and demonstrably"* outweigh the benefits of doing so.

