City of Bradford Metropolitan District Council

Housing Delivery Test Action Plan

Edition 4 2022

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Executive Summary

Housing delivery is measured against The Housing Delivery Test which was first introduced by the Government as part of the planning reforms in 2018, as a way of seeking to boost housing delivery to meet the national target of 300,000 new homes per year. The results of the Housing Delivery Test are published in the early part of each year with the latest published on the 14th January 2022.

The latest results for Bradford indicate a housing delivery test result of 74%, down from 90% in the previous year (2021). The main reasons for this drop in delivery relate to:

- Significant demolitions during 2019/20 and 2020/21
- The pandemic, which slowed the completion rates of schemes significantly during 2020/21

The implications of the current housing delivery test result are that:

- The authority should publish an action plan as housing delivery is below 95%
- A 20% buffer should be added to the calculation of the 5year housing land supply as delivery is below 85%; and
- The application of the presumption in favour of sustainable development as set out in the National Planning Policy Framework (NPPF) should apply

Under para 11 of the NPPF for decision-taking the presumption in favour of sustainable development concerns: approving development proposals that accord with an up-to-date development plan without delay (11c); or where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date (with reference to less than five year supply of deliverable housing or a housing delivery test result of less than 75%), granting permission unless: (i) the application of policies in this Framework that protect areas or assets of particular importance (defined under footnote 7 of the NPPF) provides a clear reason for refusing the development proposed; or (ii) 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 (11d)

This publication looks at the delivery of homes in Bradford District and considers the root causes of under delivery and the actions needed to ensure future delivery keeps pace with the Districts need for homes. It also sets out the measures the Council are taking to improve housing delivery at both a strategic and local level.

The results of the next Housing Delivery Test are expected in January 2023. At present there is no Government indication whether there will be any further moderation on the figure supplied for 21/22 to take account of ongoing difficulties in accessing building materials and staff vacancies caused by the pandemic nor the UK leaving the EU in December 2021. This may determine whether an Action Plan will be required for 2023.

1. Introduction

Understanding housing data

1.1 The Housing Delivery Test (HDT), is used by The Government to monitor whether local areas are building enough homes to meet their need. The HDT compares the number of homes delivered over a 3 year rolling period against the housing requirement for the same period and is published annually. It is a tool to determine to what extent the target for new homes with the benchmark of 95% has been met and to determine what steps a Local Authority will need to take to boost housing supply and delivery.

1.2 The Government have produced the Housing Delivery Test Measurement Rule Book which sets out the methodology to be applied. This is expressed as the formula below:

$$\text{Housing Delivery Test (\%)} = \frac{\text{Total net homes delivered over 3yrs}}{\text{Total number of homes required over 3yrs}}$$

1.3 The number of homes delivered (net), is sourced from the annual Housing Flow Reconciliation (HFR), data which is submitted to the Government each Autumn. This data is provided to the Department for Levelling Up, Housing and Communities (DLUHC) and is a net count of the number of new homes completed against the number demolished, together with the net change of new homes created from changes of use, conversions and other forms of accommodation such as caravans which create permanent homes. An additional allowance is also added to account for the delivery of communal accommodation such as bed-spaces in nursing homes and student rooms on the principal that this frees up other housing stock.

1.4 The Council adopted its Core Strategy, Development Plan Document (DPD) in July 2017. This sets out the current spatial and strategic policies for the District for the period 2013-2030 with a total housing requirement of 42,100 homes to be delivered within the plan period. This figure was based on the Objectively Assessed Need (OAN) of 2,476 homes annually.

1.5 Since the publication of the Core Strategy, the Government has updated how Local Authorities should determine the number of new homes needed and introduced in 2018, a Standard Method for the calculation of Local Housing Need (LHN) into National Planning Policy Guidance (NPPG). For Bradford, this generated a significantly lower annual housing need of 1,704 homes and was one of the key considerations which informed a partial review of the Core Strategy in 2019. The partial review has since been superseded by the development of a fully integrated single plan.

1.6 For housing requirements less than five years old, the HDT rule book states that the number of homes required should be the lower of either the adopted housing requirement or the minimum annual LHN figure determined by the standard methodology. For the purposes of the Housing Delivery Test, the cities and urban centres 35% uplift within the standard method will only apply from 2022/23 monitoring year. The standard method figure, excluding the uplift, is therefore 1,704 units per annum and is used in the Governments calculation. The current housing delivery test result for Bradford in accordance with the measurement technical note is set out in the table below.

Table 1: Housing Delivery Test result: January 2022

Number of homes required			Number of homes delivered			HDT result	HDT Consequence
18/19	19/20	20/21	18/19	19/20	20/21	**74%**	**Presumption**
1,695	**1,559**	**1,134**	**1,689**	**1,010**	**550**		
4,389			**3,250**				

Test Implications

1.7 The first set of HDT results were published in February 2019 in which Bradford District scored 76%. The second iteration showed an improved score of 94%, primarily as a result of improved completions for 2017/18 and 2018/19, but the third iteration of the HDT in 2021 showed a slight drop to 90%. The latest published results for the three-year period 2018/19 to 2020/21 as published in January 2022 show an overall test result of 74%. Table 2 below details the HDT results over the publication periods, which also demonstrates the annual volatility of the figures.

Table 2: Housing Delivery Test outcome – 2018 to 2022

Measurement Years	Number of homes required	Number of homes delivered	HDT result	HDT Consequence
2015-2018	5,305	4,037	76%	Action Plan and 20% buffer
2016-2019	5,138	4,819	94%	Action Plan and 5% buffer
2017-2020	4,827	4,341	90%	Action Plan and 5% buffer
2018-2021	4,389	3,250	74%	Action Plan, 20% buffer and Presumption

1.8 The first National lockdown was announced on the 23rd March 2020 in response to the global pandemic. Two further lockdowns were called after this date with consequential impacts on productivity. For over 2 years, this unprecedented event has caused disruption across the construction sector, including staff shortages and availability of building materials with a significant impact on housing delivery. Brexit has further impacted on housing delivery through additional labour constraints.

1.9 The Government acknowledged that the pandemic would adversely impact housing delivery and adjusted the period on which completions were assessed for the period 2017-2020 by 1 month to reflect this. A second adjustment was also made to the latest period 2018-21 period, but unfortunately despite this, not sufficient to negate the 2 very low yielding years of 19/20 and 20/21. The result is that Bradford Council will be required to approve homes in sustainable locations to ensure ongoing supply.

1.10 This update builds on the actions set out in the first two editions of the HDTAP and focuses on the further steps that will need to be taken to address any ongoing housing delivery obstacles across the District.

2. Housing Delivery Analysis

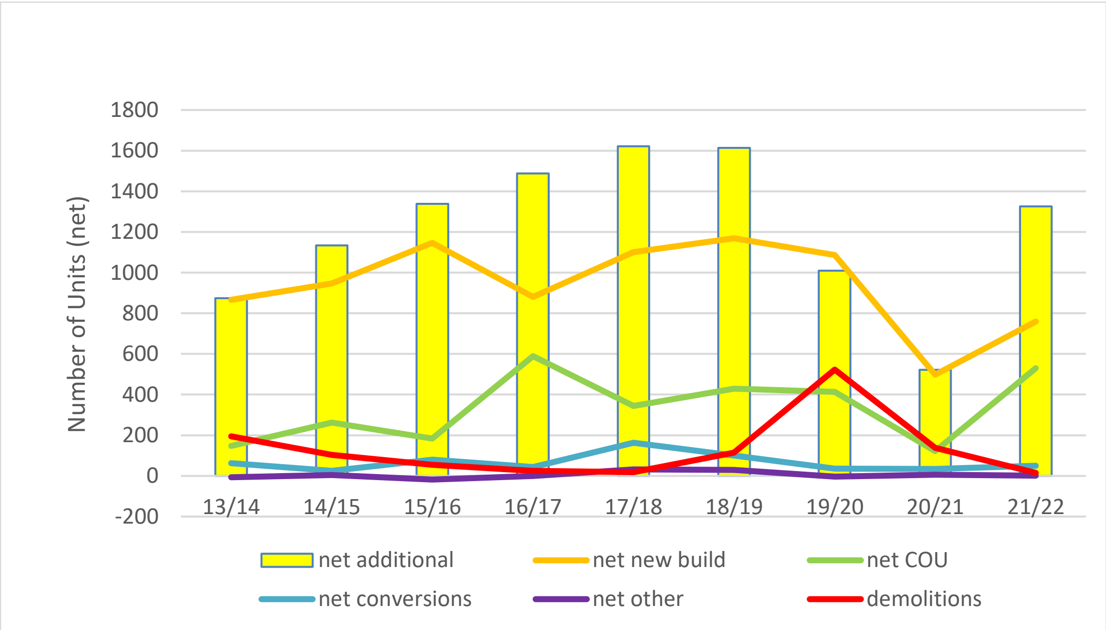
2.1 The publication of a Housing Delivery Test Action Plan shows that the Council is actively taking steps to investigate the problems involved in the delivery of new homes in the District. The production of an Action Plan also supports the delivery of the Local Plan.

Historic completion data

2.2 Figure 1 below shows that housing delivery increased steadily after 2013, with the highest net completions across 2017/18 and 2018/19 but this dropped off during 2019/20 with an improvement in 2021/22. The reason for this was not the result of any significant change to the delivery of new build homes, nor change of use, but because of a significant number of demolitions in this year. For 2020/21 all development types were significantly impacted by the drop in activity levels caused by the Pandemic but for the latest monitoring year, there has been a marked improvement in the delivery of new homes from each source, although this will not be accounted for until the next HDT outcome when it is published in January 2023.

2.3 It is not known at this stage whether the Government will provide any further mitigation to the data for 21/22 to account for the period after April 2021 where the pandemic continued to affect development activity.

Figure 1: Net number of homes completed by source since 2013/14



The supply of sites

2.4 The net completions for 21/22 show a marked increase on the previous year of 1,325 units' net, (1,384 expected with the communal accommodation top up). The level of completions within this count was noted to be clustered at the start of the period showing that the pandemic was the root cause as these might ordinarily have come through the in the previous monitoring year. Another cluster was noted toward the late summer, potentially in response to the stamp duty holiday, with buyers' eager to complete transactions before October 2021.

2.5 The planning service has continued to determine planning applications throughout the pandemic and there are clear signs that development activity across the District is picking up. Monitoring up to 31st March 2022 suggests that, some 3,891 homes could be completed on sites under construction with a further 3,204 on other undeveloped sites with detailed planning permission in place within 5 years. A further 2,173 homes could also be delivered from sites which currently have only outline permission in place, giving a total supply of 9,268 homes. The five-year housing land supply considers the rate of delivery and other factors such as viability and sites coming through the development process, together with any other potential supply from elderly people accessing nursing homes and releasing homes back into the supply. It has assessed the potential deliverable supply of new homes as 9,130 homes for the period 2022-2027. This equates to 1,826 average per year assuming a 100% completion rate for 2022-2027.

2.6 The emerging draft Local Plan published in 2021 set out an overall dwelling target of 27,675 homes for the period 2020- 2038. This figure takes into account expected losses to clearance and other uses through change of use and unforeseen homes developed on windfall sites including those on small sites, too small to allocate in the Plan. The residual target has been spread across the District with the main focus on the Regional city urban area and the Principal towns of Keighley and Bingley and the well-connected settlements of Burley in Wharfedale and Silsden. It has identified sufficient sites to meet the settlement targets in each case. These sites were identified from a significant supply of sites assessed initially by the Strategic Land Assessment (SLA), with only those assessed as suitable, available and developable going forward for more detailed assessment and selection. Further detailed work is now ongoing on the sites to determine the final list of sites going forward into the submission version of the Local Plan.

Delivery Constraints

2.7 One of the key ongoing challenges in Bradford has been bringing forward housing growth in areas where developers have been less active. This includes urban brownfield areas of the District with low sales values, remediation and potential abnormal costs, that are often smaller in scale and unattractive to volume house-builders. In recent years the number of larger brownfield sites on the Brownfield Register has decreased but a number of smaller and medium sized brownfield sites remain, with new ones being added at each review. Recent and ongoing developments in lower value areas include:

- The former headquarters of the former Grattan buildings in Girlington; Castle Mills, Keighley; Trenton Drive, Manningham; Crag Road, Shipley, the former auction Mart, Bingley and at Chellow Quarry, Haworth Rd, Heaton

- Ongoing redevelopment of buildings in and around the city centre for apartments including notable buildings such as Conditioning House, Olicana House, George Street, Pennine House and Highpoint, Westgate

Other brownfield sites now have planning permission and are expected to be brought forward in the near future;

- Buildings at Bradford College and Bolton Road, Bradford, Barkerend Mills, former Hall Mark Cards, Bingley Road, former Manningham Middle school, Manningham Lane,

2.8 Behind the positivity of ongoing development, challenges still remain in ensuring that delivery continues to keep pace with need in the locations where new homes are most required. One of the issues commonly raised by house builders is that there are too few larger sites and those that do exist often have other constraints. This is partly reflective of the legacy of a heavily urbanised area, which has struggled with the multiple challenges of de-industrialisation, deprivation and a lack of market confidence in parts of the District.

2.9 The varied topography of the District has also meant that most of the industrial development is concentrated in the south of the District and along the valley bottom of the River Aire and River Worth on Keighley with the majority of the population living in the urban centre of Bradford and the freestanding settlements of Keighley, Ilkley and Bingley. While the urban areas are quite densely developed, two-thirds of the District is rural with steep hillsides, moorland and attractive valleys surrounding and penetrating into the urban areas. The land supply is also considerably limited by flood risk, heritage and ecology / wildlife constraints, with increased costs involved in the development of sites which may contain such assets set against challenging landform.

2.10 Average house prices across the Bradford District have been consistently lower than those for the Yorkshire and Humber region (18% higher) and for England as a whole (45% higher). This is in part due to impact of the recession of 2008/9 where significant planned investments were mothballed and the market has struggled to recover since in the inner urban area. Low incomes and consequential ability to afford homes, coupled by the high levels of Victorian terraced stock which remain affordable alternatives has also affected prices. This aside there are areas with significantly higher house prices, such as in Wharfedale and the Aire Valley leading to affordability issues in these areas. More information is provided in section 3.5 below.

2.11 Certain parts of the District are also affected by poor image, limiting buyer demand and deterring volume house builders. The area also has relatively poor transport connections compared to other cities nationally despite its size as one of the largest Districts in the country. As a consequence, it does not always attract investment from employers looking to relocate in the area, hence why the Aire and Wharfe Valley areas which are better connected to neighbouring Leeds, tend to be popular and encourage higher values.

2.12 Low relative house prices compared to increasing development costs, can also have a negative impact on the delivery of new homes. This added to unknown planning issues at the time of application such as availability of finance and other remedial issues to resolve, can present developers with more challenges and costs which negate the development value to the investor and mean schemes are not implemented. Analysis undertaken for the Local Plan has shown that on average 10% of schemes with planning permission are not implemented. The level of under delivery is generally higher in the main urban areas and less in the rural fringes and more affluent suburbs such as Baildon and Ilkley.

2.13 Unprecedented demolitions in 2019/20 and 2020/21 had a significant impact on delivery for these years which was compounded by low overall delivery due to the pandemic. These demolitions were largely from former Council owned stock now managed by social housing provider Incommunities, who have taken the decision to replace unpopular flatted stock with more traditional family homes at much lower development density, with some schemes still to be implemented. There is no current indication from Incommunities, to any future substantial losses in the immediate years.

2.14 Community resistance to development has also some bearing on delivery in the District as it will in other local authority areas. This in many cases leads to a long and protracted planning application process, creating pressure on planning committee to refuse applications and then appeals and further legal challenges. In recent announcements the Government have suggested that the community should have more say in decision making, which in turn could lead to further delays in the delivery of new homes.

3. Addressing Housing Delivery

3.1 The purpose of the HDTAP is to address the issues affecting housing delivery and set out the actions needed to remove them. The following programmes and strategies will support housing growth across the District.

The Bradford Council Plan

3.2 The Bradford Council Plan is a working document covering the priorities and the principles which the Council will work by. It sets out the Councils ambitions for the District and how these will be delivered including:

- for jobs and the economy underpinned by a number of other plans including The Economic Strategy (2010-2030)
- increasing the supply of new homes and improvements to the existing housing stock to meet energy efficiency targets underpinned by the "A Place to Call Homes, a Place to Thrive" strategy
- Better educational and health outcomes with an improved environment
- Building safe and strong communities

Bradford Housing Strategy

3.3 A Place to Thrive' Bradford Housing Strategy 2020 to 2030 was published in January 2020. It sets out the vision, priorities, challenges and approach for meeting the housing needs of the residents of the district. It should be read in conjunction with this document. The Bradford 'Homelessness and Rough Sleeping Strategy 2020-2025' was also published in January 2020. It sets out the vision, themes and priority actions identified for tackling homelessness and rough sleeping and serves to guide and influence the policies and delivery programmes of partners and stakeholders.

The New Local Plan

3.4 The Adopted Core Strategy was adopted by the Council following Examination on the 18th July 2017 and sets out the broad aims and objectives for sustainable development within Bradford District to 2030. This is supplemented by two Area Action Plans for the Bradford City Centre and the Shipley and Canal Road Corridor which were adopted in December 2017. A review of the Core Strategy was consulted in Autumn 2019 which was followed by publication of a single Local Plan in February 2021 which comprises revised policies and a range of preferred site options for new homes and employment with an extended plan period up to 2038. Following consideration of the comments made on the Plan the next version "Submission" (Regulation 19) will be published in 2023 followed by submission to examination.

3.5 The Local Plan is underpinned by a new evidence base including the 2019 Strategic Housing Market Assessment (SHMA). The SHMA contains information on the Local Housing Need (LHN) calculation and provides a detailed understanding of the housing market and the housing requirements of Bradford's residents. It considers a number of key issues which can affect housing delivery rates including:

- **House Prices and Affordability** - The latest Government House Price index (published October 2021) now shows the average England property price (all property types) at September 2021 of £287,895 with the Yorkshire and the Humber region showing an average price of £192,354. In September 2021 the average house price in Bradford (all types of dwellings) was £157,209. Prices have increased in the District by 6.47% since October 2020, which implies a degree of confidence and movement in the market, possibly driven by the recent stamp duty holiday and/or higher values in neighbouring areas. However, in terms of overall affordability, wages have not increased to the same extent and as such there is still an imbalance between income and the availability of homes in some areas that are affordable.

- **Demographics –** The Office for National Statistics published the latest population forecasts in June 2021. It stated that the District generally has a young population (26.3% under 18) with a median age of 36.7 years, lower than the England and Yorkshire and Humber averages (40.2). The results from the 2021 census are expected to be available later in 2022. The population of Bradford is ethnically diverse. The largest proportion of the District's population in 2011 identified themselves as White British (64%) with people of Pakistani origin making up the second largest proportion. These factors together will create demand for a wide and diverse range of homes.

- **Dwelling Stock –** The largest proportion of the total District dwelling stock is owner occupied (around 65%) with the remainder either privately or social rented with terraced homes making up the majority of stock with most of these built pre 1940. The location of different types does differ across the District and more information is provided in the Local Area Profiles provided as part of the emerging Local Plan. In recent years the development of flats in new and repurposed buildings (often former mill buildings) have provided an increase in the flatted stock. The District has also seen a growth in retirement accommodation with a number of new build schemes aimed at older people completed and in the pipeline.

3.6 Whilst some way from being formally adopted, the Local Plan is seeking to address the shortfall of land and has identified a range of development opportunities to meet the housing requirement up to 2038. These include sites for large and small scale development providers which meet the growth needs of the smaller settlements (and support smaller scale builders) and support for more substantive growth in sustainable urban locations. The Plan allocates a broad mix of development opportunities on previously developed sites and buildings within the urban area to promote regeneration and underused greenfield sites together with green belt sites on the edge of some urban areas. These site will deliver both market and affordable housing, new homes for young families and those looking to downsize or move into residential care.

3.7 A total of 328 sites are currently identified in the Local Plan for housing, or mixed use/housing and comprise;

- 189 sites less than 1ha
- 79 sites between 1ha and 2.5ha
- 27 sites between 2.5ha and 5ha
- 33 sites larger than 5ha
- 127 sites which are predominantly previously developed (brownfield)
- 201 sites which are predominantly greenfield

3.8 Many of these sites can come forward for development ahead of the adoption of the Local Plan, as they lie in areas with few policy constraints. Sites in other areas, including in the green belt will be able to be brought forward when the Local Plan process is completed subject to any additional infrastructure or mitigation requirements identified. The current list of sites as consulted in February 2021 may be revised ahead of the publication draft of the Local Plan.

3.9 The Local Plan contains policies to drive major regeneration within the city and town centres and areas where a higher density of development would be appropriate, near services and facilities and within close proximity to public transport hubs and corridors. Work is ongoing to draw up further details of City Centre and Keighley town centre regeneration and new development opportunities, which includes establishing new housing markets and communities within often challenging urban environments. This document provides greater focus on regeneration, linked to improved transport links to drive the delivery of additional new homes.

The Local Infrastructure Plan and whole Plan Viability Assessment

3.10 The Local Plan is supported by a Local Infrastructure Plan (LIP). The LIP has been developed with input from utilities providers and service providers and identified the improvement to existing or new infrastructure required to support growth of the Local Plan. Plan-making now includes an upfront focus upon viability assessments as set out in national planning policy and guidance. Viability is a dynamic concept and understanding the local context and variables are essential to housing delivery across the District. The viability assessment sits alongside the Local Plan.

Economic Strategy

3.11 The Bradford District Economic Strategy 2018-2030 is Bradford's Economic Growth Strategy. It identifies the need to provide an affordable and distinctive housing offer and develop our housing supply to support the ambition to be the UK's fastest growing economy over the coming decade. The Bradford District's Economic Recovery Plan addresses national challenges including the economic fallout from the Covid-19 restrictions, social and increased pressure on public finances since the UK's exit from the EU to support the resident population.

Design Guidance

3.12 The Homes and Neighbourhood Design Guide produced by The Council in partnership with stakeholders, will further ensure that development is of good design quality in line with guidance in the NPPF. A Street Design Guide is also planned to complement the Homes and Neighbourhood Guide. Supplementary Planning Documents, set out the Councils detailed expectations on design to deliver better quality schemes and provide developers with greater clarity ultimately speed up decision making on future applications.

4. Steps Forward

4.1 Housing delivery clearly requires a multi-agency approach. Collaborative working with key partners including registered social landlords will drive up the provision of affordable housing and bring forward Council owned sites with private developers and self-build communities. Additional school capacity will be required to support new homes including in areas traditionally used for commercial and business use. Bradford will take steps to ensure that as a statutory education authority there are sufficient school places in the District to support the provision of new homes. Urban Capacity and Brownfield Land support

4.2 Master planning, can provide the basis for future planning permission and guide developers in the provision of site and community infrastructure, mitigation and design decisions. The Council has commissioned work on a number of sites identified in the Local Plan, including some sensitive sites on the edge of urban areas and difficult sites within the urban areas including in Keighley, which have remained undeveloped for a number of years. This work involves detailed site master planning in some cases and other viability work for others, to potentially unlock these sites to enable them to be brought forward for development. The sites are a combination of Council owned and privately owned sites.

4.3 Additional development frameworks aimed at unlocking further potential in the City centre is also taking place, with a new city village concept in the “Top of Town area”. This ambitious vision aims to repurpose and revitalise a former retail area into a green and healthy sustainable neighbourhood of around 1000 homes. Further proposals including the development of grade A office accommodation at One City Park and longer term regeneration in the Southern Gateway to include up to 2,500 new homes and business opportunities linked with infrastructure investments, including a new hospital and other proposals are aimed at transforming the city and the Districts image on the national stage.

4.4 To provide a clearer picture of the availability of any additional sites which could be developed for new homes, a new Urban Capacity Study is being undertaken. This will identify additional sites of all sizes with assessment work determining whether residential development would be suitable. Previously developed sites meeting the brownfield register threshold of 0.25ha/5 homes will be added to the 2022 register and also included as additional sites in the Local Plan.

4.5 In line with Government requirements, Bradford have produced a Brownfield Register annually since 2017. This includes a number of sites which already have planning permissions in place and sites/buildings where the delivery of new homes would be supported by the Council, which now also appear in the Local Plan. Over the past 3 years, numerous homes have been developed on such sites, many of them small sites which have come forward having been included on the register.

4.6 In July 2020 the West Yorkshire Combined Authority (WYCA) was allocated £66.7m of capital funding to support the development of 4500-6000 new homes on brownfield sites across the region (The Brownfield Housing Fund). The fund is derived from Government and will support the delivery of housing sites where normal funding to bring forward underutilised and brownfield sites has been challenging. Eligible sites can be from the public or private sector and is aimed at sites where a funding gaps exists and those with specific constraints which need to be addressed to allow development to take place. The Council working collaboratively with partners have submitted a number of sites into this fund for consideration.

4.7 The Council is also looking at ways to bring forward available land in Council ownership which could include working with delivery partners to bring forward specialist housing products such as Self Build, Assisted living and senior housing, accommodation for Gypsies and Travellers and further affordable housing. In addition to the Brownfield Housing Fund outlined above, the West Yorkshire devolution deal has meant that WYCA has also been allocated a further £3.2m to develop a housing pipeline – Housing Pipeline Revenue Fund. Bradford has secured funding from this source towards technical and feasibility studies.

4.8 The Council recognises that there is a need to support the improved liveability of the urban area and attract other investment, including better transport. It is working with WYCA to improve roads to cope with higher rates of housebuilding and improvements in public transport. This includes increasing the capacity of strategic roads, improvements to bus corridors, provision of new and improved railway infrastructure and provision for cyclists and pedestrians. Ambitions remain focused upon driving up housing in the city centre and to secure national investment in the form of new strategic rail and transit infrastructure and better local networks. Further investment is also required on localised improvements to public transport, to better connect local communities to jobs, education and leisure facilities and improvements to public realm, open spaces and green infrastructure in many urban areas.

4.9 The improvements to the connection between Liverpool/Manchester and Leeds envisioned by Transport for the North with a new railway station in the city centre remains a Council priority despite recent announcements by the Government to cancel the Northern Powerhouse Rail project. The development of a new city railway station and improved connections to the wider networks will bring new strategic investment which will not only transform the city but also provide the catalyst for the transformation and renewal of the city centre housing market and business economy and that of adjacent areas. Mass transit will promote sustainable travel by better connecting adjacent towns, neighbourhoods and communities which will also accelerate housing growth. It is also hoped that improved connectivity will also support the case for a new hospital in the city centre.

4.10 The LCR Transforming Cities fund will support the delivery of further walking and cycling initiatives and other enhancements to help support regeneration and make more attractive living environments. It is centred around the civic quarter of the city centre and will improve better access between Centenary Square (The Mirror Pool) and the theatres and Media museum. This could involve the removal of the Jacobs Well roundabout and Vehicular access on Hall Ings and closure of the lower part of Little Horton Lane with an improved pedestrian environment created. Further enhancements will include potential pedestrianisation of Market Street and Broadway which will improve air quality and the experience and in turn trigger new housing markets.

4.11 The Townscape Heritage Scheme will support further public realm improvements and the delivery of new family homes in the area defined as the “City Village/Top of Town” currently occupied by The Oastler Market. Towns fund initiatives are also being rolled out for Keighley and Shipley will also provide a stimulus for new growth. The plan also has a specific focus upon diversifying housing types (including urban housing) and providing affordable housing and a wider choice of homes for all communities including specialist housing and meeting the needs of gypsies and traveller communities.

4.12 In June 2022, the District was announced as the 2025 City of Culture. Aside of future events planned to celebrate this title, it is hoped that more investment will be a positive outcome which will in turn trigger renewed housing markets, particularly in the inner urban areas around the city centre. This coupled with the delivery of improved transport links, better pedestrian environments and the provision of new hospitals, offices, the Odeon (Bradford Live) development and new market on Darley Street, should create a more positive impression of the city and drive up interest from homes providers as has been the case in other cities.

5. Conclusions and Actions

5.1 The Council acknowledge that a step change in supply is essential if we are to address our housing delivery shortfall and meet our current and future housing needs. A new corporate working group with Officers from planning, housing and regeneration now meets monthly to identify issues with delivery and consider solutions to any obstacles on sites to ensure that homes can be delivered in the right locations and in support of our ambitions to stimulate economic growth across the District. This group also focuses upon options for supporting funding. Further work is also to be progressed in developing a housing enabling strategy – widening housing delivery and supporting growth across the District.

5.2 Resources have also been re-focused upon ensuring that the right infrastructure is in place to support growth including transport and local infrastructure requirements within the city and other key growth locations. The outputs from these projects are often long-term. Further work across the Council has also been undertaken on identifying further brownfield opportunity sites and to align emerging local plan preferred options with funding opportunities.

5.3 In conclusion and in accordance with the Council Plan, we will continue to work with local communities, landowners, agents and house builders to deliver high quality homes, promote brownfield site opportunities and seek to maximise investment in low value areas to underpin local economic recovery. The Local Plan will develop a cohesive approach to place making, balancing open spaces to create healthy neighbourhoods which appeal across generations. This Action Plan has outlined the main issues and over the next year will continue to seek solutions to under delivery in Bradford with the main focus on the four key actions:

- **Action 1 - Ensure Bradford meets the District Housing Requirement and has a five year supply of housing land**

  Continued progress will be made on delivering and promoting the emerging Local Plan and the Council will continue to maximise returns on property assets and work proactively with developers to bring forward high quality planning applications.

- **Action 2 - Ensure quality housing that provides the right mix of housing types across the District**

  Policies in the emerging plan support the Councils wish to further expand housing choice, including developments for more specialist housing options. The preferred list of sites within the local plan contains a wide range of sites to meet the needs for all sizes and types of provider, whether it be the self-builder or developer of retirement homes

- **Action 3 - Drive forward the delivery of brownfield sites and others in low value areas**

  This will be supported by regional investment managed by the West Yorkshire Combined Authority (WYCA), through the Brownfield Fund and the Brownfield Register which will continue to provide a resource for investors looking for small and medium sized site options in the urban areas. The housing enabling strategy will provide further detail on facilitating the delivery of new housing and improving the housing pipeline.

- **Action 4 – Support for a renewed City Centre Housing offer**

  A significant proportion of the Local Plan housing target is directed toward the city centre. The delivery of transformational development in the city centre driven by wider national and strategic transport investment will help stimulate and support new housing markets; improved environmental and community infrastructure and help grow a stronger economy. This in turn will drive wider regenerative impacts across neighbouring areas.