



City of
BRADFORD
METROPOLITAN DISTRICT COUNCIL

City of Bradford Metropolitan District Council

Housing Delivery Test Action Plan



Edition 3 2021

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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 19th January 2021.

The latest update to the National Planning Policy Framework – NPPF (July 2021) states that where delivery has fallen below 95% of a Local Authorities housing requirement that an Action Plan should be prepared which assesses the causes and actions needed to improve delivery. In the latest test which measures the three years up to March 31st 2020 Bradford's result was 90% and as a result an Action Plan is required.

This document looks at the delivery of homes in Bradford and considers the obstacles to delivery and the actions needed to ensure future delivery keeps pace with the Districts need for homes.

The results of the 2021 Housing Delivery Test are expected in January/February 2022. The Government have already indicated that these will be moderated to take account of the restrictions placed on developers as a result of the global pandemic and access to materials which slowed many schemes during 2020/21. This will determine whether an Action Plan will be required for 2022.

1. Introduction

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:

The measurement 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 by each Local Planning Authority each Autumn. This data is provided to the Department for Levelling Up Housing and Communities (DLUPHC) (formerly the Ministry for Housing, Communities and Local Government (MHLG)) and is a net count of the number of new homes compared to 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 allowance is also included for communal accommodation such as bed-spaces in nursing homes and student shared flats on the principal that this frees up housing stock previously occupied.

1.4 The Council adopted the Core Strategy Development Plan Document (DPD) in July 2017 which sets out the spatial and strategic policies for the District for the period 2013-2030. The housing requirement set out in the Core Strategy was for a total of 42,100 homes to be delivered within the plan period, with the Objectively Assessed Need (OAN) of 2,476 homes annually. Since the publication of the Core Strategy, Government has updated how Local Authorities determine housing need and introduced a Standard Method for the calculation of Local Housing Need (LHN) into National Planning Policy Guidance (PPG) in 2018. For Bradford this generated a significantly lower annual housing need and was one of the key considerations informing the partial review of the Core Strategy which started in 2019. The partial review has since been superseded by the development of a fully integrated single plan.

1.5 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 as set out in national planning guidance. The standard method includes four steps to calculating the minimum annual local housing need figure: step 1 – setting the baseline; step 2 – affordability adjustment; step 3 – capping

mechanism and step 4 – cities and urban centres uplift. For the purposes of the Housing Delivery Test, the cities and urban centres uplift within the standard method will only apply from 2022/23 monitoring year (from the 2023 Housing Delivery Test measurement). The standard method figure excluding the uplift is therefore 1704 units per annum and is used in the calculation.

1.6 National planning policy guidance sets out the test requirements and implications as:

- Where delivery has been less than 95% - LPAs should prepare an Action Plan within 6 months of the result being published
- Where delivery has been less than 85% - a 20% buffer should be applied to 5-year housing land supply statements (the “deliverable” supply)
- Where delivery has been less than 75% - the assumption in favour of sustainable development will apply (as set out by the NPPF), subject to transitional arrangements as also set out in the NPPF.

1.7 The first set of HDT results were published in February 2019 and the Bradford District scored 76% with an under delivery of 1,268 homes for the period. In the second publication (February 2020), the Districts position had improved to a score of 94%, primarily as a result of improved completions for 2017/18 and 2018/19. The table below shows the latest published results for the three-year period 2017/18 to 2019/20 published in January 2021, with a HDT result of 90%.

Table 1: Housing Delivery Test results for 2017/18 – 2019/20

Number of homes required			Number of homes delivered			HDT result	HDT Consequence
2017 - 2018	2018 - 2019	2019 - 2020	2017 - 2018	2018 - 2019	2019 - 2020	90%	Action Plan
1,573	1,695	1,559	1,642	1,689	1,010		
4,827			4,341				

1.8 The first National lockdown was announced on the 23rd March 2020 in response to the global pandemic. This unprecedented event has had an impact on housing delivery nationally which has caused disruption across the construction sector. The Government acknowledged that this would affect housing delivery test results and adjusted the calculation to account for this. This has been reflected in this year’s result, but despite this, the latest measurement still means that a Housing Delivery Test Action Plan is required. The ongoing situation will also be addressed in next year’s result to acknowledge the difficulties being experienced by the industry generally with a further allowance of 4 months afforded to each Local Authority for the next HDT.

1.9 This update builds on the actions set out in the first two editions of the HDTAP and focuses on how to address ongoing housing delivery obstacles across the District.

2. Taking a Comprehensive Approach

- 2.1 The purpose of the HDTAP is to look at housing delivery, identify any obstacles and set out actions to remove them. It is undertaken within the context of other published council plans, strategies and activities which will support housing growth across the District. These include the following:

Council Plans & Strategies	
Bradford Council Plan	The Bradford Council Plan is a working document covering the priorities and the principles which the Council will work by. It sets out priorities for the District for jobs, housing, education and health and how these will be delivered.
The Core Strategy and Emerging Local Plan	The Adopted Core Strategy was adopted by the Council following Examination on 18 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. The Council commenced a review and consulted on a Preferred Options document in Autumn 2019. Work started on a single Local Plan in mid-2020 to cover both strategic policies and site allocations and the draft (Regulation18) version consulted upon during February and March 2021. This document provides greater focus on regeneration particularly in the City centre with the identification of a new southern gateway and in Keighley town centre linked to improved transport links to drive the delivery of additional new homes, together with a greater focus on the redevelopment of existing land and buildings. The Local Plan is underpinned by a new evidence base including the 2019 Strategic Housing Market Assessment (SHMA) and Five Year Housing Land Supply Assessment
The Brownfield Register	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. 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.

<p>Housing and Homelessness Strategy</p>	<p>‘A Place to Call Home, A Place to Thrive, Housing Strategy for Bradford District, 2020-2030’ 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. The Bradford ‘Homelessness and Rough Sleeping Strategy 2020-2025’ was 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.</p>
<p>Housing Strategy for the over 50’s</p>	<p>Housing Strategy for the over 50s 2011-2021 ‘Great Places to Grow Old’ - Bradford’s housing strategy for the over 50s which sits under the joint housing strategy for the district. The strategy was developed in consultation with the district’s Older People’s Partnership and sets out a strategy for the Council to work with other organisations to make sure housing in the District will meet needs of an ageing population.</p>
<p>Local Infrastructure Plan</p>	<p>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.</p>
<p>Whole Plan Viability Assessment</p>	<p>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.</p>
<p>Economic strategy</p>	<p>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.</p>

Homes and Neighbourhoods: A Guide to Designing In Bradford (SPD)	Adopted by the Council as a Supplementary Planning Document (SPD) on 4 February 2020. The guide seeks to deliver a step change in the quality of new housing in the District based on a vision for green, safe, inclusive and distinctive neighbourhoods that create healthy communities for all.
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2.1 Since the publication of the last Housing Delivery Test Action Plan (2020), Bradford Council have consulted on a new single Local Plan for the District (Regulation 18), which included a number of new and revised policies aimed at delivering new housing, driving up the quality of new homes and encouraging the regeneration of the District's urban areas. The emerging Local Plan also consulted on a range of Preferred Site Options for new homes and an extended plan period up to 2038. Following consideration of the comments made on the Plan, Officers are now working on a submission version (Regulation 19) which will be published in 2022.

2.2 The most up to date information on District housing issues is captured in the Strategic Housing Market Assessment (SHMA). This includes 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. There are a number of key issues identified originally by the SHMA and expanded upon below:

- House Prices and Affordability - Average house prices across the District have been consistently lower than those for the Yorkshire and Humber region and for England as a whole with a significant range of values across the District. 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). <https://ubd.bradford.gov.uk/about-us/population/> The results from the 2021 census are expected to be available 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

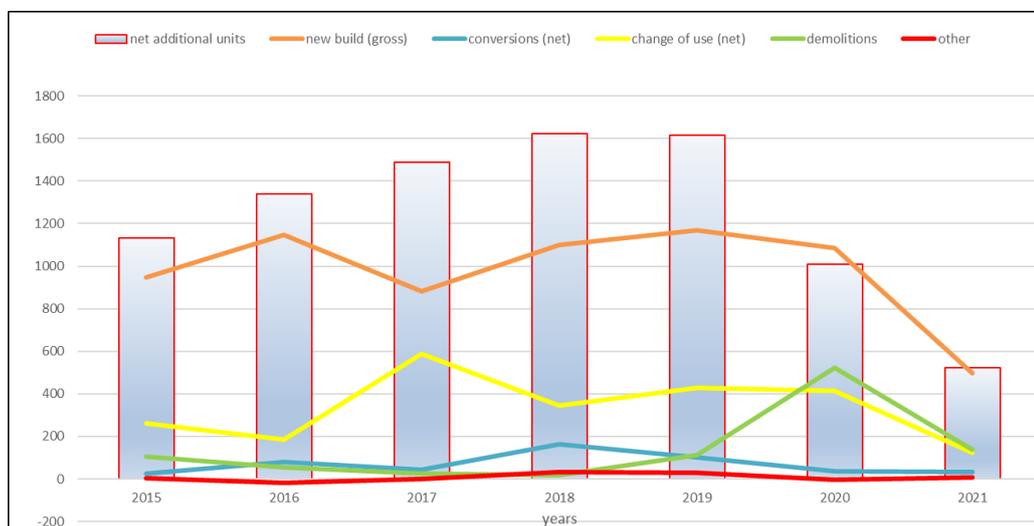
proportion. These factors together will create demand for a wide and diverse range of homes.

- 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. Key Delivery Issues

- 3.1 Figure 1 below shows that housing delivery had increased steadily after 2015, with the highest net completions across 2017/18 and 2018/19 but this dropped off during 2019/20 partly as a result of the pandemic but largely due to high demolitions in this year. Most notable is the line for new builds, which remained reasonable stable at around 1100 per year (until this year), whereas homes from changes of use peaked during 2016/17 but normally averages around 400 annually. Data for 2020/21 is illustrated in the graph and whilst the Government have recently announced some redress to cover this monitoring year, in Bradford's case it is unlikely to make any real difference in the HDT outcome for 2022, where the pandemic has clearly continued to affect development activity.

Figure 1: Net number of homes by type completed since 2014/15



Pandemic and Post-Brexit Housing Market

- 3.2 The planning service has continued to determine planning applications throughout the pandemic and there are signs that development activity across the District is picking up. At the start of the 2021/22 financial year, over 200 small and large development sites comprising in total some 4,300 homes were considered to be under construction. Detailed planning permissions is also in place for a further potential 3,100 homes. Many of these homes could theoretically be delivered within the 2021/22 period, but it is still too soon to be able to be properly forecast delivery given the ongoing pandemic, post Brexit issues and construction challenges in terms of materials, logistics and labour. In conclusion, for the next year at least, forecasting has been moderated down based on the reasonable expectation that the 2021/22 return will show some improvement on the 2020/21 outturn but potentially still less than previous delivery.

Delivering new housing in challenging housing market areas

- 3.3 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 and, 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. The next Brownfield register will include a number of new opportunities identified in the emerging Local Plan., Recent and ongoing developments in lower value areas include:

- The former headquarters of Grattan in Girdlington, Bradford; Castle Mills, Keighley; Trenton Drive, Manningham; Crag Road, Shipley and Chellow Quarry, Haworth Rd, Heaton
- Ongoing redevelopment of buildings in and around the city centre for apartments including notable buildings such as Conditioning House and Barkerend Mills

3.4 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 where these do occur, are relatively dispersed and fragmented and 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.

Challenging physical environments

3.5 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 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 topographical, heritage and ecology / wildlife constraints, with increased costs involved in the development of sites which may contain such assets and challenging landform.

4. Steps Forward - Planning for more homes

Widening Supply of Housing and Larger Scale Sites

- 4.1 Whilst some way from being formally adopted, the emerging 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 small scale development to meet the growth needs of the smaller settlements (and support smaller scale builders) and support for growth in sustainable urban locations including a mix of opportunities in the urban area to promote regeneration and with some greenfield sites on the urban edges. These site will deliver both market and affordable housing. For identified Local Plan sites in brownfield locations within settlements, housing delivery does not have to wait for the Local Plan to progress.

Delivering new housing in challenging housing market areas

- 4.2 The emerging 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. Overall the work requires a coordinated and comprehensive approach to regeneration supported in some instances by funding to help deliver housing on brownfield sites. .
- 4.3 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.
- 4.4 The Council recognises that there is a need to support the improved liveability of urban area and attract other investment, including better transport. 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.
- 4.5 The Northern Powerhouse Rail (NPR) proposal remains a Council priority despite recent announcements by the Government. The heart of this proposal lies with the development of a new city railway station and improved connections to the wider networks. This 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.

- 4.6 The 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. The Townscape Heritage Scheme will also support 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.
- 4.7 Housing delivery clearly requires a multi-agency approach. Collaborative working with key partners such as registered social landlords will drive up the provision of affordable housing together with bringing forward and delivering land in Council ownership is also the key to driving up housing number alongside support for self-build and other small scale builders.
- 4.8 The [Homes and Neighbourhood Design Guide](#) produced by The Council in partnership with stakeholders will 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.

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 the 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 brownfield opportunity sites and to align emerging local plan preferred options with funding opportunities.
- 5.3 In conclusion and in accordance with our District 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.