

# City of Bradford Metropolitan District Council

## Housing Delivery Test Action Plan



**August 2019**

**Edition 1**

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# 1. INTRODUCTION

- 1.1 The Government has introduced a package of reforms that will help to increase the supply of new homes. A key aspect of these changes is the Housing Delivery Test (HDT) which was introduced by the updated National Planning Policy Framework (NPPF) in July 2018. The test assesses the number of homes built in local authority areas over the previous three years and compares these against the local housing requirements for the same period.
- 1.2 The first set of results of the Housing Delivery Test Measurement were published in February 2019<sup>1</sup>. The Bradford District scored 76%<sup>2</sup> with an under delivery of 1,268 homes over the last three years (this represents the gap between the number of homes required (5,305) and the number of homes delivered (4,037)). The results as published are set out in in Table 1 below.
- 1.3 As a consequence, there is a requirement for the Local Planning Authority (LPA) to prepare a Housing Delivery Action Plan (HDTAP) and to add a 20% buffer to the housing land supply calculation. A 20% buffer was applied to the Council's most recent five-year housing land supply statement (1<sup>st</sup> March 2019)<sup>3</sup> and this action plan has been developed to clearly focus upon improving housing delivery within the District in light of the HDT results.

Table 1: Housing Delivery Test

Number of homes required			Number of homes delivered			HDT	HDT Consequence
2015 - 2016	2016 - 2017	2017 - 2018	2015 - 2016	2016 - 2017	2017 - 2018	76%	20% Buffer
1,862	1,870	1,573	907	1,488	1,642		
5,305			4,037				

- 1.4 This is the Council's first HDTAP and it demonstrates a commitment to identifying the obstacles to new housing development across the District. It investigates the reasons for the persistent under delivery of new homes and the actions which need to be taken in order to address these challenges. The HDTAP actions will help to ensure that our community's future housing needs can be met, and that our economic growth ambitions will be supported through the provision of new, quality housing. The next publication of the HDT is scheduled for November 2019

<sup>1</sup> Housing Delivery Test: Measurement MHCLG, 19<sup>th</sup> February 2019

<sup>2</sup> It is noted that the office MHCLG 'net additional dwellings' live tables for year 2015/16 has an inaccurate net completion figure of 907. Although the Council has tried to have this changed to the correct figure of 1,338 net completions the figure of 907 remains on public record and has therefore been included for the purposes of the Housing Delivery Test Action Plan.

<sup>3</sup> <https://www.bradford.gov.uk/media/5212/five-year-housing-land-statement-and-appendices.pdf>.

and the Council will review recently issued national planning policy guidance in the production of following editions of the action plan.

### Relationship to Council plans/strategies and Council activities

- 1.5 This HDTAP is undertaken within the context of other council plans, strategies and activities which will support housing growth across the District. These include the following, some of which are under review or evolving:

<b>Council Plans &amp; Strategies</b>	
<b>Bradford Council Plan</b>	The Bradford Council Plan sets out how the Council will work with others to contribute to priorities set out in the Bradford District plan 2016-2020. Key priorities include the need to increase the number of homes to meet the rising demand for housing; to provide decent, safe homes that are appropriate for people's needs and support for people in most housing need. The Council Plan is currently under review.
<b>Adopted Core Strategy</b>	The Adopted Core Strategy is a key Development Plan Document (DPD) that forms part of the Local Plan for the Bradford District. It 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. It identifies a need for a total of 42,100 dwellings over the plan period to 2030.
<b>Bradford City Centre Area Action Plan</b> <b>Shipley Canal Road Corridor Area Action Plan</b>	The Council adopted the City Centre AAP and Shipley and Canal Road Corridor AAP on 12 <sup>th</sup> December 2017. The AAP's form part of the statutory planning framework for Bradford City Centre and Shipley and Canal Road Corridor and plan for sustainable growth in these areas to 2030.
<b>Core Strategy Partial Review (CSPR)</b>	The Council agreed to commence a review of its adopted Core Strategy in 2018 and has produced a Preferred Options document (Regulation 18, July 2019), which sets out updated policy positions with supporting evidence on strategic policies including housing and employment need. The Preferred Options has been produced to reflect changes in government policy including the standardised calculation of housing need and enhanced Green Belt protection and updated local policy on economic growth ambitions. The CSPR sets out a revised minimum housing need of 1703 dwellings per annum over a revised plan period of 2020-37 (28,951 units in total).
<b>Housing and Homelessness Strategy</b>	The Housing and Homelessness Strategy: 'A Place to Call Home' reflects the commitment of the Council and its partners to meet the housing needs of residents

	<p>across the District. The Housing and Homelessness Strategy is currently under review and expected to be published towards the end of 2019. A decision has been taken to have two distinct strategies; a Housing Strategy and a Homelessness and Rough Sleeping Strategy.</p>
<p><b>Housing Strategy for the over 50's</b></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><b>Bradford Local Investment Plan</b></p>	<p>Bradford Local Investment Plan 2011-2020 – this sets out the housing investment requirements for the next three years, which are necessary for supporting the delivery of Bradford's Housing and Economic Strategies and underpinning wider economic success across the District.</p>
<p><b>Local Infrastructure Plan</b></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. The LIP is being updated to align with work progressing in the CSPR and Allocations DPD.</p>
<p><b>Whole Plan Viability Assessment</b></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 will sit alongside the development of the CSPR and Allocations DPD.</p>
<p><b>Economic strategy</b></p>	<p>Economic Strategy 2017-2030 – Growing Together is Bradford's Economic Growth Strategy. This identifies the need to provide an affordable and distinctive housing offer and develop our housing supply. It sets out the ambition to be the UK's fastest growing economy over the coming decade increasing the value of our economy by £4bn, getting 20,000 more people into work and improving the skills of 48,000 residents.</p>

1.5 The remaining structure of the report is concentrated upon:

- **Section 2: Bradford District – Housing Context:** a summary of recent housing research; housing supply and delivery; the local area and types of sites; viability and deliverability and planning strategy and forecast needs.
- **Section 3: Findings from Stakeholder Feedback:** feedback from stakeholders over key constraints to housing delivery.
- **Section 4: Action Plan:** Identified range of key actions and prioritisation.
- **Section 5: Project Management and Monitoring:** summary of key project and risk management arrangements.

## 2. Bradford District – Housing Context

### Taking a comprehensive approach

2.1 Bradford District is an enterprising and energetic place. The Council aims to reflect this through working with partners and communities to create a healthier, caring, more prosperous and sustainable Bradford District.

2.2 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.



### Recent housing research

2.3 The most up to date information on the strategic housing market context and local needs is captured in the Strategic Housing Market Assessment (SHMA) 2019<sup>4</sup>, which comprises of a household survey with input from 3,459 respondents, online surveys with stakeholders and interviews with estate and letting agents and an up-to-date review of secondary data.

### House Prices and Affordability

2.4 Median house prices across the District have been consistently lower than those for the Yorkshire and Humber region and for England as a whole<sup>5</sup>. During 2018, median prices across the District were £131,000, compared with £155,000 across Yorkshire and the number and £230,000 across England<sup>6</sup>. During 2018, lower quartile prices were 4.6x lower quartile incomes. This compares with 5.8x across the region and 7.3x across England. Within the District, affordability ratios were highest in City North East (6.4x) and City West (6x) and in Wharfedale the affordability ratio was 5.1 given the higher income profile of the area.

2.5 While the income to house price affordability ratios are not as high as other parts of the country, there is still a substantial affordable housing requirement within the District. The latest edition of the SHMA indicates an overall annual net imbalance of 441 dwellings per annum. In terms of affordable housing dwelling type these

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[https://www.bradford.gov.uk/Documents/planningStrategy/Core%20Strategy%20Partial%20Review/Core%20Strategy%20Partial%20Review%20-%20Preferred%20Options%20Report/Bradford%20Strategic%20Housing%20Market%20Assessment%20\(SHMA\)%202019.pdf](https://www.bradford.gov.uk/Documents/planningStrategy/Core%20Strategy%20Partial%20Review/Core%20Strategy%20Partial%20Review%20-%20Preferred%20Options%20Report/Bradford%20Strategic%20Housing%20Market%20Assessment%20(SHMA)%202019.pdf)

<sup>5</sup> Land Registry Price Paid Data

<sup>6</sup> Land Registry Price Paid Data

are split 25.1% one bedroom, 30.6% two bedroom, 28.3% three bedroom and 16% four or more bedroom. A tenure split of 65% rented and 35% intermediate tenure is also recommended.

## Demographics

- 2.6 We recognise that the District's population is growing and creating demand for a wide range of homes across the district. Bradford District is home to around 10% of the Yorkshire and the Humber's population and in 2018 the population was estimated to be 537,173<sup>7</sup>. According to the 2016-based population projections, the population of Bradford District is projected to increase by 2.4% over the period 2019-2037 to around 549,540 in 2037<sup>8</sup>. There will be a marked increase in the number and proportion of older residents. The population aged 65+ years is expected to increase by 39.5% from 80,960 in 2019 to 112,950 in 2037<sup>9</sup>. This compares with an increase of 35.1% across Yorkshire and the Humber and 40.1% across England over the period 2019-2037.
- 2.7 The Bradford District currently has a relatively young population with 23.8% of the District's population aged under 16 and Bradford has the fourth highest percentage in England after the London Borough of Barking and Dagenham, Slough Borough Council and Luton Borough Council. Bradford has a median age of 36.2 which is lower than the median age for England (39.9) and Yorkshire and the Humber region (40) and the second lowest (after Leeds which has a median age of 35.4) in West Yorkshire<sup>10</sup>.
- 2.8 Between the 2001 and 2011 Census the Bradford District became more ethnically diverse. The largest proportion of the District's population identified themselves as White British (63.9%) in the 2011 Census down from 76.1% in 2001. Bradford has the largest proportion of people of Pakistani ethnic origin (20.4%) in England – an increase in six percentage points since the 2001 census. The proportions of people from Black, Mixed, Bangladeshi, Other Asian and Other White also increased between the census period<sup>11</sup>.

## Economic Profile and Earnings

- 2.9 Across Bradford District, 57.3% of Household Reference People (HRP)<sup>12</sup> are economically active and in employment (2011 Census) and a further 12% are retired from work, 5.8% are unemployed, 9.8% are students and 15.1% are economically inactive. According to the 2011 Census, 70% of residents in employment living in Bradford District also work in the district, with 30% commuting out, in particular to Leeds (14.9%), Calderdale (3.3%), Kirklees (2.7%), Craven (2.3%) and elsewhere (6.7%). The Office for National Statistics (ONS) identifies that across the District incomes are lower than the regional and national averages. Lower quartile earnings in 2018 were £19,018 (compared with £19,775 across Yorkshire and the Humber and £21,273 across England) and

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<sup>7</sup> ONS 2018 Mid-year population estimate

<sup>8</sup> ONS 2016-based Subnational Population Projections

<sup>9</sup> ONS 2016-based Subnational Population Projections

<sup>10</sup> Data reproduced from <https://ubd.bradford.gov.uk/about-us/population/>

<sup>11</sup> Data reproduced from <https://ubd.bradford.gov.uk/media/1348/ethnicity-in-bradford.pdf>

<sup>12</sup> HRPs provide an individual person within a household to act as a reference point for producing further derived statistics and for characterising a whole household according to characteristics of the chosen reference person. For a person living alone, it follows that this person is the HRP.



median incomes were £25,143 (compared with £26,894 across Yorkshire and Humber and £29,869 across England)<sup>13</sup>.

- 2.10 In terms of multiple deprivation, Bradford District ranks as the 19<sup>th</sup> most deprived local authority in England (where 1 is the most deprived local authority and 326 is the least deprived) and 2<sup>nd</sup> most deprived in the Yorkshire and Humber region (after the City of Kingston upon Hull)<sup>14</sup>. Whilst much of the northern area of Bradford, around Ilkley in Wharfedale ranks in the least deprived areas of England, a number of areas in the City of Bradford and Keighley are ranked amongst the most deprived 10 per cent in England.

### Dwelling Stock

- 2.11 This SHMA assumes a total of 217,930 dwellings<sup>15</sup>. It is estimated that there are 9,623<sup>16</sup> properties (4.4%) which are not occupied, the majority of which are vacant. The SHMA uses a base of 208,307 households across the district<sup>17</sup>. Based on 2011 Census household data, the tenure profile of the District is:
- 65% owner occupied (29.3% owned outright and 35.7% owned with a mortgage or loan);
  - 15.4% affordable (14.8% rented from a social landlord and 0.6% shared ownership); and
  - 19.6% private rented or living rent free.
- 2.12 The latest 2017 Valuation Office Agency data reports that:
- 18.9% are 1-or 2-bedroom houses, 43.7% are 3-bedroom houses, 14.1% are 4 or more-bedroom houses;
  - 8.3% are 1-bedroom flats, 7.4% are 2 or more-bedroom flats; and
  - 5.0% are 1-or 2-bedroom bungalows and 2.6% are 3 or more-bedroom bungalows.

Stock condition is a particular issue for the District and associated with terraced houses and older properties.

### Planning Strategy and Forecast Needs

- 2.13 The overall Development Plan for the District currently comprises the following:
- Saved Policies of the Replacement Unitary Development Plan (adopted October 2005)
  - Bradford Core Strategy (adopted July 2017)
  - Bradford City Centre Area Action Plan (adopted December 2017)
  - Shipley and Canal Road Corridor Area Action Plan (adopted December 2017)
  - Bradford Waste Management DPD (adopted 2017)
  - Burley in Wharfedale Neighbourhood Plan (2018)

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<sup>13</sup> ONS 2018 Annual Survey of Hours and Earnings

<sup>14</sup> Index of Multiple Deprivation (2015)

<sup>15</sup> 2018 Council Tax –compares with 216,640 2017 Valuation Office

<sup>16</sup> 2018 Council Tax

<sup>17</sup> 2018 Council Tax –compares with a 2018 figure of 208,961 using 2014-based MHCLG household projections

The Addingham Neighbourhood Plan has recently successfully gone through examination and is due to be considered by Executive in September 2019.

- 2.14 Both the Adopted Core Strategy and the two Adopted AAP's have included public consultation throughout their preparation. In accordance with the NPPF, in undertaking the Partial Review of the Core Strategy and Site Allocations DPD preparation and to speed up the Local Plan, engagement with stakeholders will need to be proportionate and effective.
- 2.15 Following the publication of a revised NPPF for comments in May 2018 and the revised approach to the standard methodology for calculating housing need, plus the publication by the Government of new and substantially lower population and household projections, the Council decided to undertake a Partial Review of the Core Strategy. This review will ensure that the correct minimum housing growth target is reflected within the Core Strategy and in turn will re-examine the issue as to whether there are exceptional circumstances to justify changes to the Green Belt and in so doing ensure that all reasonable options have been examined fully for meeting its identified need for development including use and intensification of use of brownfield sites.
- 2.16 The adopted Core Strategy sets out an overall housing requirement for the period 2013-2030 of 2,476 dwelling per annum or circa 42,100 homes. The Council's CSPR Preferred Options report which is currently subject to consultation sets out a revised minimum housing need figure of 1703 dwellings per annum or 28,951 dwellings over a suggested revised 17-year plan period of 2020-37. The housing figure has been calculated using the Government's Standard Methodology. This sets the minimum starting point for assessing the homes needed though Government guidance suggests that Council's should also consider whether there is a need and justification to plan for a higher figure for example relating to economic uplift or strategic infrastructure. At present the Council does not consider that there is a justification for a figure higher than this minimum.
- 2.17 The CSPR contains a number of headline themes, which is partially reflective of the changing wider policy and environmental context to plan-making and includes:
- Balancing growth while protecting local assets – reduced but ambitious minimum housing target and a lower level of Green Belt release – reflective partially of Government's heightened emphasis on the protection of Green Belt;
  - Investing in regeneration opportunities – maximising opportunities for major transport investment and making the best use of neighbourhood renewal opportunities;
  - A greener and healthier place – reducing air pollution and our carbon footprint – investing in green infrastructure, biodiversity, walking, cycling and cleaner public transport to help deliver more liveable and healthy places;
  - Supporting jobs, training and skills development – growth of at least 1600 jobs per year plus support for skills, development and training and the delivery of the right high-quality employment spaces in the right locations; and

- Driving high quality housing and place-making – making a step change in the quality of housing and place-making.

- 2.18 One of the key challenges in delivering the CSPR is tacking housing growth in areas where standard volume house builders have not been active – primarily brownfield urban areas, often requiring more regeneration related interventions.
- 2.19 Following the publication of the CSPR for public consultation the Council is preparing an Allocations Development Plan Document (DPD) Preferred Options, which will set out a set of preferred housing site allocations, amongst other content. A Preferred Option will reflect the strategic approach outlined in the Core Strategy as the most sustainable vision for each settlement area, insofar as this is possible.
- 2.20 Development of the Core Strategy Partial Review and the Allocations DPD is being twin-tracked by the Council in order to expedite the process. The objective is to issue the Publication Draft in July 2020, followed by Submission for Examination later the same year.



### Housing Supply and Delivery

- 2.21 The Council's most recent 5 Year Housing land Supply Statement published in March 2019 covering the period 2018-23<sup>18</sup> indicated that the 5-year deliverable supply stood at 2.06 years or 7,421 dwellings.

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<sup>18</sup> <https://www.bradford.gov.uk/planning-and-building-control/planning-policy/five-year-housing-land-statement/>

2.22 Using data to the same baseline date, the Council has also published a Housing Land Supply Update (HLSU)<sup>19</sup>. This document is not a full Strategic Housing Land Availability Assessment but does provide a comprehensive set of data on the housing land delivery and technical availability to 31st March 2018. The summary of position table for the District from the HLSU is provided below in Table 2. The table uses the Adopted Core Strategy targets as its starting position and then details the number of homes completed since the start of the plan period, the expected delivery from planning permissions and total potential need remaining against target.

Table 2: Summary of Position (as at 31<sup>st</sup> March 2018)

	Adopted Core Strategy No.	No. new homes completed (net)	Expected No. of new homes from sites where planning permission is in place	Total potential delivery	Total potential need remaining against target*	% Remaining against target
<b>Regional City (total)</b>	<b>27,750</b>	<b>3,743</b>	<b>6,991</b>	<b>10,734</b>	<b>17,016</b>	<b>61.32%</b>
City Centre	3,500	762	1,772	2,534	966	27.6%
Canal Road Corridor	3,100	228	1,206	1,434	1,666	53.74%
Bradford NE	4,400	774	1,532	2,306	2,094	47.59%
Bradford NW	4,500	547	884	1,431	3,069	68.20%
Bradford SE	6,000	827	357	1,184	4,816	80.27%
Bradford SW	5,500	443	1193	1,636	3,864	70.25%
Shipley	750	162	47	209	541	72.13%
<b>Principal Towns (total)</b>	<b>6,900</b>	<b>916</b>	<b>1,381</b>	<b>2,297</b>	<b>4,603</b>	<b>66.71%</b>
Bingley	1,400	201	493	694	706	50.43%
Ilkley	1,000	255	125	380	620	62%
Keighley	4,500	460	763	1,223	3,277	72.82%
<b>Local Growth Centres (total)</b>	<b>4,900</b>	<b>1,024</b>	<b>694</b>	<b>1,718</b>	<b>3,182</b>	<b>64.94%</b>
Burley in Wharfedale	700	79	111	190	510	72.86%
Menston	600	35	10	45	555	92.5%
Queensbury	1,000	365	74	439	561	56.10%
Silsden	1,200	123	343	466	734	61.17%
Steeton	700	311	132	443	257	36.71%
Thornton	700	111	24	135	565	80.71%
<b>Local Service Centres (total)</b>	<b>2,550</b>	<b>590</b>	<b>726</b>	<b>1,316</b>	<b>1,234</b>	<b>48.39%</b>
Addingham	200	60	28	88	112	56%
Baildon	350	92	138	230	120	34.29%
Cottingley	200	33	3	36	164	82%
Cullingworth	350	99	207	306	44	12.57%
Denholme	350	78	155	233	117	33.43%
East Morton	100	8	4	12	88	88%
Haworth	400	60	129	189	211	52.75%
Harden	100	6	29	35	65	65%
Oakworth	200	37	16	53	147	73.5%
Oxenhope	100	24	4	28	72	72%
Wilsden	200	93	13	106	94	47%
<b>DISTRICT TOTAL</b>	<b>42,100</b>	<b>6,273</b>	<b>9,792</b>	<b>16,065</b>	<b>26,035</b>	<b>61.84%</b>

\*this is a net requirement figure meaning additional land will need to be identified based on the expected level and pattern of losses of stock through clearance and demolition'

<sup>19</sup> <https://www.bradford.gov.uk/planning-and-building-control/planning-policy/bradford-land-supply-update/>

- 2.23 As can be noted in Table 2, some progress on the delivery of the Core Strategy has been achieved. Completions up to 31st March 2018 and capacity on deliverable sites with unimplemented permissions amount to approximately 38.16 per cent of the Adopted Core Strategy target. Settlements with greater than 50% of target potentially met include: Bradford City Centre, Bradford North East, Steeton, Baildon, Cullingworth, Denholme and Wilsden. Lowest delivery rates are associated with Bradford South East, Menston, Thornton, Cottingley and East Morton.
- 2.24 Information on current Previously Developed Land (PDL) performance against target extracted from the HLSU is noted below in Table 3. The HLSU concludes that good progress has been made in bringing forward land identified for development in the Replacement Unitary Development Plan and on land which has been previously developed (PDL). To date 73% of all completed homes have been developed on such sites and a further 61% of all other permissioned homes are on PDL.

Table 3: Current PDL Performance against target

	Regional City Total	Principal Towns Total	Local Growth Centres Total	Local Service Centres Total	DISTRICT TOTAL
<b>Core Strategy Target</b>	<b>27,750</b>	<b>6,900</b>	<b>4,900</b>	<b>2,550</b>	<b>42,100</b>
Policy HO6 - PDL target (dwellings)	15,263	3450	735	893	<b>21,050</b>
Policy HO6 - PDL Target (%)	55%	50%	15%	35%	<b>50%</b>
Total completions,	3,743	916	1,024	590	<b>6,273</b>
Total PDL completions	3,199	671	378	334	<b>4,582</b>
Proportion of completions on PDL	85%	73%	37%	57%	<b>73%</b>
Extant permissions	6,991	1,381	694	726	<b>9,792</b>
Extant permissions on PDL	4,376	598	317	621	<b>5,912</b>
Proportion of extant permissions on PDL	63%	43%	46%	86%	<b>60%</b>
Total PDL completions and extant permissions	7,575	1,269	695	955	<b>10,494</b>
Remaining PDL requirement to meet Policy HO6 (dwellings)	7,668	2,181	40	-63	<b>10,556</b>
Remaining PDL requirement to meet Policy HO6 (%)	45%	47%	1%	-5%	<b>41%</b>

**Note: Some extant permission may not be implemented.**

- 2.25 Behind the headlines, the delivery picture is far from simple. Some good sites originating from the RUDP in locations of low activity and potentially higher sales values remain unimplemented and there are some ‘hotspots’ in the District where build out rates have been stronger than expected.
- 2.26 The Council’s Brownfield Register was first published in December 2017. The purpose of the register is to promote those sites which already have planning permission in place but have not been developed. The register should also contain sites which the Council considers suitable, available and achievable for residential development. The register was last updated in December 2018 and while the number of sites on the register (216 entries) remains the same by coincidence from 2017 to 2018 the total of sites with detailed permission has increased from 53 to 65<sup>20</sup>.
- 2.27 Much of the analysis in the preceding paragraphs has related to a relatively short snapshot of time. The District’s average net housing delivery rate over 20 years is 1236 dwellings per annum. The highest delivery rate recorded over this period was in 2007/08 at 2156 units and lowest of 696 in 2010/11 with the ‘weighted average’ across the top 10 best performing years being 1519 units.
- 2.28 The Council’s Authority Monitoring Report (2018) provides information on affordable housing completions from 2013-18<sup>21</sup>. Against total completions, affordable housing completions averaged 18.15% over the 5 year period - this can be contrasted against an Adopted Core Strategy policy target of 15-30% affordable housing depending upon geographical location.

### Local Area and Types of Sites

- 2.29 Bradford Metropolitan District is characterised by a mixture of urban and rural areas with distinctive character and attractive landscapes. The varied topography of the Bradford District (particularly Airedale and Wharfedale Valleys) means most of the industrial and residential development is in the south of the District and along the valley bottoms of the Rivers Aire and Wharfe and their tributaries, with the majority of the population living in the urban centre of Bradford and within the freestanding settlements of Keighley, Bingley and Shipley, in Airedale, and Ilkley, in Wharfedale. While the urban areas are quite densely developed, two-thirds of the District is rural with moorland and attractive valleys surrounding and penetrating into the urban areas.
- 2.30 Another important feature of the District is the South Pennine Moors Special Protection Area (SPA) / Special Area of Conservation (SAC) which together with Sites of Special Scientific Interest, total about 12.28% of the Bradford Land cover. Much of the District (65%) is also designated Green Belt, totally about 23,886 ha. The Green Belt is tightly drawn around settlements<sup>22</sup>. The topography of the area, natural environment and Green Belt provide a series of constraints to development.

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<sup>20</sup> <https://www.bradford.gov.uk/planning-and-building-control/planning-policy/the-brownfield-register/>

<sup>21</sup> Authority Monitoring Report 2017-18, March 2019

<sup>22</sup> Information taken from AMR 2018

2.31 The overall portfolio of current housing sites consists of very few larger yield sites and is relatively dispersed and fragmented with few concentrations of sites. This is partly reflective of the legacy of heavily urbanised area, which have struggled with the multiple challenges of de-industrialisation, deprivation and a lack of market confidence in parts of the District. Table 4 below groups data from Appendix A of the HLSU in terms of completed sites by total site capacity for the Regional City and Principal Towns (total of 145 sites). It can be noted from the frequency table that almost half of all completions relate to sites of less than 10 dwellings. Almost 85% of the 145 sites listed were delivering completions on relatively small sites (no more than 50 units).

**Table 4: Completed Sites by Total Site Capacity – Regional City and Principal Towns**

Location	Yield 5-9	Yield 10-25	Yield 26-50	Yield 51-99	Yield 100-249	Yield 250+	Totals
Regional City – City Centre	6	4	6	3	1	0	20
Regional City – Canal Road Corridor	4	1	2	1	0	0	8
Regional City – Bradford North East	10	6	3	5	1	0	25
Regional City – Bradford North West	9	6	0	2	1	0	18
Regional City – Bradford South East	9	5	5	2	1	0	22
Regional City – Bradford South West	4	1	4	1	0	0	10
Regional City - Shipley	2	3	0	0	1	0	6
Principal Towns - Bingley	7	1	3	0	0	0	11
Principal Towns - Ilkley	8	0	1	1	0	0	10
Principal Towns - Keighley	10	3	0	1	1	0	15
Totals	69	30	24	16	6	0	145
Percentage	47.6%	20.7%	16.6%	11.0%	4.1%	0.0%	100%

### Viability and Deliverability

2.32 The Council's Community Infrastructure Levy (CIL) evidence and CIL Charging Zone Map provides a general overview of residential values at the time of development. While research has been commissioned to update the viability evidence for the Local Plan and CIL, it still allows for some useful insights:

- There are significant variations in market conditions and values across the District, with the District broken into 4 residential changing zones.
- The highest value charging zone is located across the Wharfedale corridor / north of the District and include locations such as Addingham, Ilkley, Burley in Wharfedale and Menston. These are locations where significant developer interest has been focused and growth has been generally lower.
- Zones 2 and 3 (higher to medium values) includes the vast majority of areas outside Bradford City to the north and west but excludes, Keighley, Oakworth, Denholme and Thornton.
- Zone 4 (lower values) includes the Regional City of Bradford, Keighley, Oakworth, Denholme and Thornton – generally in the case of Bradford City – locations where population growth has been greatest.

2.33 The Council recognises that there is a need to support a wider and more varied range of housing products to not only respond to positive market signals in some locations but also support the regeneration of areas with lower values. The discussion about the local area and types of sites highlighted that there are some significant constraints to housing delivery across the District but much of the delivery has been through a patchwork of small sites.

2.34 There are no simple solutions to improving housing delivery. As noted in the Letwin Review (2018)<sup>23</sup>, a key constraint is the build out rates on large sites primarily delivered by volume housebuilders which is partly the result of the ‘absorption rate’ - how many homes can be sold into a local market without overwhelming the demand to buy. There is also a high degree of ‘homogeneity’ of products, which means that housebuilders can often compete for sales with broadly the same type and size of homes. Solutions to the problems may include diversifying the housing offers to include a wider range of size and types of homes also a more varied approach to tenure – shared ownership, build to rent and social and affordable rent.

### **Moving Forward – Recent Directions**

2.35 Consequently, to ensure we get a mixed supply of housing to meet the needs and aspirations of the District, a great deal of work is already underway which will serve to unlock housing delivery across the District. In accordance with our District Plan, we will continue to work with housebuilders to deliver high quality, affordable homes where our communities need them. We will continue our work with housing providers, including housing associations and private landlords, to make sure homes in the District are decent, safe and support those in housing need.

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<sup>23</sup> Independent Review of Build Out Final Report – Rt Hon Sir Oliver Letwin MP (October 2018) CM9720



- 2.36 The Council has also produced a new Homes and Neighbourhood Guide (SPD)<sup>24</sup> in partnership with stakeholders to 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.

#### Allocating Resources

- 2.37 We 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. We have therefore committed additional resources in working towards getting a comprehensive up to date Adopted Local Plan in place. Dedicated project management resources have been allocated with frequent reporting to a Local Plan Board consisting of senior officers and the portfolio holder for regeneration, planning and transport. We recognise this as a key priority and critical to getting homes delivered in the right locations and in support of our ambitions to stimulate economic growth across the District.
- 2.38 Resources have also been re-focused upon ensuring that the right infrastructure is in place to support growth including transport infrastructure within the city and other key growth locations. The outputs from these projects are often long-term.

#### Next Steps

- 2.39 While work is progressing through various initiatives on place-making and area regeneration – it is acknowledged that further work is required in this regard. Bradford District has a complex housing market and there is a need to more fully understand how the Council can help transform its housing markets in less viable locations and also support growth across the District – providing the right balance of housing for our diverse needs.
- 2.40 In Section 3 we asked a sample of stakeholders (internal and external) to explore what we could do more to improve our housing delivery and focus upon key issues.

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<sup>24</sup> Currently subject to formal consultation - <https://www.bradford.gov.uk/planning-and-building-control/planning-policy/supplementary-planning-documents/?Folder=SPDs%20in%20preparation\Homes+and+Neighbourhoods+-+A+Guide+to+Designing+in+Bradford>

### 3. Findings from Stakeholder Feedback

#### Stakholder Survey

- 3.1 The Council has gathered a broad range of evidence and views from a variety of key stakeholders involved in planning policy, planning processes and the delivery of housing across the District. This has included a review of policy documents and has factored in past and present research studies in relation to housing delivery. It has also involved engagement with volume housebuilders, Registered Providers, SMEs and intermediaries who contribute to our housing supply in order to gain an understanding of the key factors influencing delivery across the District. This has involved engaging with providers and developers who are active in the District and those that have had little activity in Bradford but are delivering regionally. The details on the numbers and key parties involved in the survey are detailed in Appendix 1.
- 3.2 The feedback received, combined with our knowledge of local sites, land and development activity and housing context has aided identification of the issues and barriers to delivery and the actions required to overcome them. Overleaf we set out the four common themes that have been identified.



## Theme 1 - Planning Policy

The developers interviewed considered that Bradford was disadvantaged in the competition for new investment as a result of a lack of supply of suitable allocated sites. Delays in the plan preparation process was found to be causing frustration amongst those keen to invest in Bradford.

- Whilst the preparation of the Local Plan is advancing, the continued absence of an Adopted Allocations DPD was considered by some respondents to be creating prolonged uncertainty and frustration for developers, housebuilders and for investment. The developers interviewed have told the Council that Bradford is disadvantaged in the competition for new investment as a result of lack of a supply of deliverable allocated sites.
- Consultees considered that the lack of a five-year housing land supply<sup>25</sup> with approximately just 2 years of land supply remaining is directly impacting upon the potential future pace of housing delivery. Those consulted identified that there is a lack of sites of the right size and in the right locations to attract housing development. This does not relate solely to greenfield or Green Belt sites but also deliverable brownfield sites which are also likely to be of interest.
- Further, housebuilders and intermediaries advise that many of the remaining allocated sites are not of commercial interest to their businesses.
- Delays in the plan preparation process is argued to be causing frustration amongst those keen to invest in Bradford. There is a risk that option agreements<sup>26</sup> will not be renewed, putting housing delivery at risk, or at least building delays into the process as new developers are sought by landowners once agreements expire.

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<sup>25</sup> Five year Housing Land Statement, April 2018-March 2023, 1<sup>st</sup> March 2019

## Theme 2 – Planning Processes

Whilst there was some variation in the views of those consulted, in general, consultees advise that Bradford Council is performing well in terms of the planning application process and is regarded as being above average in terms of its pre-application service. The majority of consultees cited the development management process as being a positive experience and that the Council was supportive in getting potential issues resolved.

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- Although the general feedback in relation to the development management process is positive, it is recognised that the lack of resources sometimes results in delays, although there is empathy for this.
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- Whilst growth is an agreed priority for the District as set out within the District Plan, those consulted in relation to the HDTAP reported frustration where despite officer's recommendations to approve, the Planning Committee issues a refusal. This can create costs to the council and delays to the pace of housing delivery.
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- The Council provides Members with informal briefing sessions where points of clarification can be resolved in advance of an application being considered at the Planning Committee, but that this process may need reinforcing. Several consultees considered that this is helpful on more complex sites as a way of reducing the risk of deferments.
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## Theme 3 – Development Viability & Supply-Side Issues

The Housing Land Supply Update (March 2018) shows that there are currently 9,792 extant planning permissions accounting for 23% of the Core Strategy target. Of these approximately 60% are on previously developed land (PDL) which can often prove more challenging to deliver as a result of the physical constraints.

Consequently, some of these extant permissions may not be deliverable.

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- Issues typically affecting new homes supply in some areas is the viability and deliverability of sites. Prevailing low values and slower sales rates, in combination with physical constraints, such as contamination, flood risk, archaeology and infrastructure needs, can adversely impact on development viability of some sites in some parts of the District<sup>27</sup>.
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- Previously Developed Land (PDL) can come forward in good locations<sup>28</sup> where values and sales rates are sufficient to enable viable schemes to be delivered. However, it is recognised that brownfield site development can prove a challenge, particularly in weaker market areas in the District. Reliance on private sector development on marginal brownfield sites in the absence of public sector grant support, can place housing delivery targets at risk.
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- Unrealistic aspirations of land value by landowners can be a major challenge in terms of site acquisition and development viability and impacts on the ability of housebuilders and Registered Providers to access viable sites.
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- There is a low level of activity in Bradford by Registered Providers. Registered Providers also need to adopt a commercial approach to project viability and need greater planning certainty and access to land supply. A diversified supply of land will enable an accelerated pace of housing delivery.
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<sup>27</sup> Cushman and Wakefield undertook research into Bradford District's Housing Market in 2015 with many of the findings remaining relevant today.<sup>27</sup> The report highlights the diverse housing market areas (with multiple sub markets of high and low value) with different characteristics. A large proportion of the district is of medium and low housing demand and low sales values prevail in some areas which are challenging in terms of attracting investment and development activity.

<sup>28</sup> The Housing Land Supply update (2018) indicates that the proportion of dwellings completed on previously developed land (PDL) is currently higher than the Core Strategy targets

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- Some interviewee feedback indicates that certain sites with outline planning permissions which have been offered for sale by landowners are not considered to be commercially viable/deliverable. This can result in extant planning permissions which are unlikely to proceed in the short term, as they might not be implementable.

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- It was suggested by many consultees that the active promotion of suitable sites by the Council would be beneficial and may aid development activity across different residential sectors. We heard for example that SME builders typically encounter difficulties identifying a pipeline of sites. Such promotion would go beyond the Council's Brownfield Sites Register.
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## Theme 4 – Promotion of Sites and Enabling Works

The Council's housing team is well respected and continues to be instrumental in the direct delivery of homes at sites within the District as part of its Affordable Homes Programme. However, it is recognised by some consultees that this team is under-resourced, with limited capacity to promote and drive forward housing delivery on stalled sites.

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- There is a lack of an appropriately resourced and skilled team whose role it is to promote housing development on sites in Bradford, trouble-shoot barriers to investment and draw up business cases for council investment in enabling works and site assembly to unlock stalled sites. The Council does not provide a focused after-care service to landowners and developers of permissioned and allocated sites.
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- Limited Council resources within the housing team is adversely impacting on the ability for the Council to proactively engage with Registered Providers, SME's and community groups resulting in little new build supply activity in these sectors.
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- Responsibility for promoting and enabling new homes construction in Bradford is currently shared across a number of services. HDTAP consultees have highlighted the benefits that would be realised by having a dedicated Housing Delivery Team (HDT). Internal and external consultees agreed that a new HDT with the appropriate resources to provide strong leadership, focus and direction to drive and co-ordinate housing delivery on suitable sites would be likely to make a meaningful difference to the rate of supply across all price points. This team would need to include the skills to undertake pro-active site assembly, brokerage between landowners and housebuilders, delivery of enabling works and to establish partnering arrangements with housebuilders and Registered Providers. Establishing a multi-disciplinary team along these lines is currently in motion.
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## 4 Action Plan

4.1 This Housing Delivery Action Plan sets out a number of practical measures which the Council is implementing to address below target rates of housing delivery. Some of these actions build on existing activities currently underway as highlighted previously, however, new interventions are identified in which the Council will have a proactive role. Our HDTAP includes mechanisms for managing and monitoring these specified actions moving forward. Four key strands of activity are identified where a range of activities will be focused.

Action	Task Description	Lead Officer(s)	Expected Outcome	Timescale (short, medium)
<b>Council Supporting Role in Housing Delivery</b>				
<b>Adoption of Local Plan</b>	Through the Local Plan Board, continue to strengthen governance and project management surrounding the preparation of the Local Plan.	Strategic Director (Place)	Risks to twin tracked Core Strategy Partial Review and Site Allocations DPD are proactively managed and monitored and production expedited without further delays.  Engage all parts of the organisation including operational delivery.	Short term
	Make housing supply central to Corporate Objectives to support resourcing	Strategic Director (Place)  Assistant Directors (Economy & Development and Planning & Transport and Highways)	Reinforce shared determination and resolve in prioritising and resourcing of planning policy preparations	Short term
	Continue to review resourcing requirements to deliver Core Strategy Partial Review and Site Allocations DPD through to examination stage + on programme.	Strategic Director (Place)	Reduce risk to Local Plan Timeframe for Adoption and expedite process.	Short term






Action	Task Description	Lead Officer(s)	Expected Outcome	Timescale (short, medium)
	Ensure plan evidence is proportional and robust and risk management processes are in place including through appropriate legal engagement	AD Planning & Transport and Highways	Risk of contention and protracted examination is reduced.	Short term
<b>Enabling Role and Council Interventions</b>	Explore alternative and innovative funding approaches with investment partners such as Homes England recoverable investment and Local Growth Fund and WYCA (West Yorkshire Combined Authority)	Strategic Director (Place)	Brownfield/inner urban areas enabled developments	Medium term
	Implement plans for a dedicated, skilled and resourced Housing Delivery Team (HDT).	Strategic Director (Place) Assistant Directors (Economy & Development and Planning & Transport and Highways)	Provision of end to end development management services to unlock stalled sites.	Short term
	Publicise list of permissioned suitable sites (linked to HDT)	Planning & Transport Strategy Manager	Increased visibility of permissioned and non permissioned suitable sites for housebuilders, developers and Registered Providers to actively encourage development activity	Short term
	Prepare a Delivery Plan for a pipeline of suitable sites in "warm markets"	Regeneration Development Manager Assistant Director (Economy & Development)	Unlock sites to enable housing delivery/ delivery of complex work programmes	Short to Medium

Action	Task Description	Lead Officer(s)	Expected Outcome	Timescale (short, medium)
<b>Enabling role and Council Interventions</b>	Proactive engagement with the sector to address issues/challenges in housing delivery across the District (links to PM role above)	Strategic Director (Place) Assistant Director (Economy & Development) Assistant Director (Estates & Property)	Council proactively works with this sector to enable new housing delivery	Short to Medium
	Consider market testing the securing of one of Home England's Strategic RP Partners to act as the delivery partner for the interim pipeline. (links to HDT)	Assistant Director (Economy & Development Services); Principal Housing Development Manager	Council proactively works with these sectors to enable new housing delivery and speed up housing site pipeline delivery	Short to Medium
	Work closely with agencies/partners to access funding to address infrastructure constraints (links to HDT)	Assistant Director (Economy & Development Services); Principal Housing Development Manager	Unlock sites to enable housing delivery on unviable sites	Medium to Long Term
	Secure planning permissions on Council owned sites and other viable sites (links to HDT)	Assistant Director (Economy & Development Services); Principal Housing Development Manager	Unlock sites to enable housing delivery on unviable sites	Medium term
	Council to mediate with landowners where necessary (links to HDT)	Assistant Director (Economy & Development Services); Principal Housing Development Manager	Pro-actively facilitate site assembly and accelerate development	Short to Medium term
	Review resourcing requirements for above enabling activities including Housing Team Resources to Interim Sites Pipeline for implementation	Assistant Director (Economy & Development Services); Principal Housing Development Manager	Pro-actively facilitate site assembly and accelerate programme of managed development	Short term

Action	Task Description	Lead Officer(s)	Expected Outcome	Timescale (short, medium)
<b>Small sites development</b>	Support to self-build and community groups. Support to Registered Providers (linked to HDT)	Principal Housing Development Manager	Increased development activity on small sites and market diversification	Short to medium term
<b>Review and Improve residential planning application /determination processes</b>	Reinforce and further support existing Planning Committee training e.g. flood/drainage and development viability. Reinforce the importance of the Local Plan and role of decision making in accordance with NPPF.	Strategic Director (Place) AD Planning & Transport and Highways	Improved confidence in Planning Case Officer recommendations. Positive outcomes for the community.  Fewer unnecessary delays and costs associated with Planning Appeals.	Short to medium term.
	Accommodate requests for pre-application engagement in a timely fashion without compromising the current high standard of service provided	AD Planning & Transport and Highways	Fewer delays experienced	Short term
	Fast track revised applications	AD Planning & Transport and Highways	Delays in processing applications minimised and reduced costs	Short term
	Renegotiate S106's where necessary to enable development to proceed <sup>29</sup>	AD Planning & Transport and Highways	Unlock stalled developments due to undeliverable/unviable permissions	Short Term

<sup>29</sup> In some instances, landowners obtain planning permission with an agreed s106 with the intention of disposing of the land to a housebuilder/developer with the benefit of the planning permission. On occasion the s106 agreement places too great a policy burden on the development, rendering the scheme unviable and therefore the developer will seek to renegotiate the S106.

Action	Task Description	Lead Officer(s)	Expected Outcome	Timescale (short, medium)
	Increased use of Planning Performance Agreements for larger scale and complex sites	AD Planning & Transport and Highways	Agreed deliverable timescales for determination of applications. Faster and more effective planning application process	Short term

Timeframe	Priority Level
Short – within 6 months	Critical 
Medium – 6 to 12 months	Essential 
Long – 12-24 months	Important 

## 5 Project Management and Monitoring

### **Project Management**

- 5.1 The Strategic Director for Place will be responsible for ensuring the actions within this Action Plan are monitored and tasks are implemented. Quarterly progress reports and update will be provided to the Place Outcome Board which has representation from planning, housing, transport planning and economic development.
- 5.2 There will also be progress reports to the Council's Executive on progress in preparing the Local Plan.

### **Reviewing and Risk Management**

- 5.3 The Action Plan will be reviewed and updated on an annual basis as part of the Council's Authority Monitoring Report and will be aligned with the publication of the annual Housing Delivery Test results.

## Appendix 1: Range of Interviewees

- Seven active developers / site promoters / house builders were interviewed
- Three developers who are not active in the District were interviewed.
- Three Registered Providers were also interviewed.
- Eight planning officers were interviewed

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