



City of
BRADFORD
METROPOLITAN DISTRICT COUNCIL

City of Bradford Metropolitan District Council

Housing Delivery Test Action Plan



August 2020
Edition 2

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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. In the spring budget of 2020 the Minister announced that the Secretary of State for Housing Communities and Local Government would be setting out reforms to the planning system. These will include ways to accelerate the development process and will involve a stricter approach on Local Planning Authorities who fail to meet their local housing need.
- 1.2 Paragraph: 042 (Reference ID: 68-042-20190722) of the National Planning Practice Guidance sets out a number of measures which Local Planning Authorities must take if delivery falls below certain thresholds as follows:
- the authority should publish an action plan if housing delivery falls below 95%;
 - a 20% buffer on the local planning authority's 5 year land supply if housing delivery falls below 85%; and
 - application of the presumption in favour of sustainable development if housing delivery falls below 75%, subject to the transitional arrangements set out in [paragraph 215 of the Framework](#).

These consequences apply concurrently, for example those who fall below 85% should produce an action plan as well as the 20% buffer. The consequences will continue to apply until the subsequent Housing Delivery Test measurement is published. The relevant consequence for any under-delivery will then be applied. Should delivery meet or exceed 95%, no consequences will apply.”

- 1.3 The first set of results of the Housing Delivery Test Measurement were published in February 2019¹. The Bradford District scored 76% with an under delivery of 1,268 homes for the period 2015/16-2017/18. In the second publication¹ the District's position had improved to a score of 94%, partly as a result of improved completions for 2018/19 but mainly due to the removal of the low yield year of 2015/16 from the calculation. The results as published are set out in Tables 1a and 1b below.
- 1.4 In line with the national guidance and based on the on the 76% housing delivery test result from February 2019, the Council produced its first HTDAP and applied a 20% buffer within the Council's last five-year housing land supply (5YHLS) statement. Although delivery has improved significantly it still falls just below 95%. There remains a requirement for the Local Planning Authority (LPA) to prepare a Housing Delivery Action Plan (HDTAP) however the buffer to be applied to the requirement within the next 5 YHLS calculation is 5%. This updated action plan has been developed to clearly focus upon ensuring continued improvements on housing delivery within the District in light of the HDT results.

¹ Housing Delivery Test: Measurement MHCLG, published 19th February 2019 and 13th February 2020

Table 1a: Housing Delivery Test results for 2015/16 to 2017/18 (published February 2019)

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

Table 1b: Housing Delivery Test results for 2016/17 to 2018/19 (published in February 2020)

Number of homes required			Number of homes delivered			HDT	HDT Consequence
2016 - 2017	2017 - 2018	2018 - 2019	2016 - 2017	2017 - 2018	2018 - 2019	94%	Action Plan
1,870	1,573	1,695	1,488	1,642	1,689		
5,138			4,819				

- 1.5 The Council's first HDTAP set out the obstacles to new housing development across the District. It looked at the reasons for the persistent under delivery of new homes and the actions which needed to be taken in order to address these challenges. The HDTAP actions identified 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. This update builds on these actions and sets out progress since the first HDTAP.

Relationship to Council plans and strategies

- 1.6 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:

Council Plans & Strategies	
Bradford Council Plan	The Bradford Council Plan sets out how the Council will work with others to contribute to priorities set out in the Bradford District plan. 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.
Adopted Core Strategy	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.
Bradford City Centre and Shipley Canal Road Corridor Area Action Plans	The Council adopted the City Centre AAP and Shipley and Canal Road Corridor AAP on 12 th 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.
Core Strategy Partial Review (CSPR)	The Council agreed to commence a review of its adopted Core Strategy in 2018 and consulted on a Preferred Options document (Regulation 18, Autumn 2019). This document - 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) based upon the published Standard Method. ²
The Local Plan Allocations Development Plan Document (DPD)	The Allocations DPD (Regulation 18) is scheduled for consultation in Autumn 2020. The document focuses upon the Council's spatial ambitions for a revised CSPR plan period and details of proposed preferred allocations for new homes and employment.
Housing and Homelessness Strategy	'A Place to Call Home, A Place to Thrive, Housing Strategy for Bradford District, 2020-2030' was published in January 2020. The strategy 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. The strategy 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.
Housing Strategy for the over 50's	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.
Bradford Local Investment Plan	Bradford Local Investment Plan sets out the housing investment necessary for supporting the delivery of

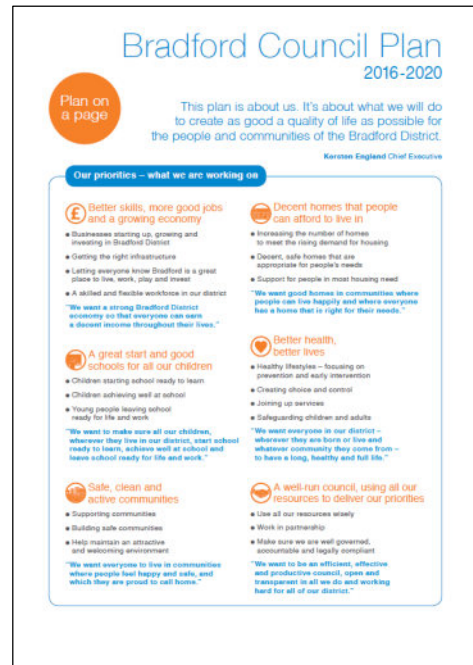
² It is noted that Government is also consulting on further changes to Standard Method for assessing housing numbers in strategic plans (MHCG 'Changes to the current planning system' August 2020)

	Bradford's Housing and Economic Strategies and underpinning wider economic success across the District.
Whole Plan Viability Assessment	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.
Economic strategy	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.
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.

2. 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 at the time of publication on the strategic housing market context and local needs is captured in the Strategic Housing Market Assessment (SHMA) 2019³, 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 whole⁴. Between April 2019 and March 2020 house prices in the District averaged £136,000 with prices from as little as £71,000 in areas on the edge of the city centre and parts of Keighley, to in excess of £350,00 in Wharfedale. Bradford District average prices are significantly lower than those across Yorkshire and the Humber region with an average of £164,000 across the same period. The average house price in England at March 2020 was £248,000 (£232,000 UK).⁵
- 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 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.

³ Core Strategy Partial Review

^{4/5} Land Registry Price Paid Data

Demographics

- 2.6 It is recognised 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 537,173⁶. According to the population projections the population of Bradford District is projected to increase by 2.4% by 2028, 3.8% by 2037 and 5.2% by 2043. There will be a marked increase in the number and proportion of older residents. The population aged 65+ years is expected to increase from 14.8% in 2018 to 17.2% by 2028 (19.6% by 2037). These proportions lie below the national average estimates for England of 18.2% (2018) and 20.7% (2028).
- 2.7 The Bradford District currently has a relatively young population with 23.8% of the District's population aged under 16 and 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 years 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 Yorkshire⁷.
- 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 period⁸

Economic Profile and Earnings

- 2.9 Across Bradford District, 57.3% of Household Reference People (HRP)⁵ 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 median incomes were £25,143 (compared with £26,894 across Yorkshire and Humber and £29,869 across England)⁸.
- 2.10 In terms of deprivation, Bradford District ranks as the 21st most deprived local authority in England (where 1 is the most deprived local authority and 326 is the least deprived). The index of deprivation uses seven domains which include income, employment, education, health, crime access to housing and living environment. Whilst much of the northern area of the District, around Ilkley in Wharfedale ranks in the least deprived

⁶ ONS 2018 Mid-year population estimate⁷ Data reproduced from <https://ubd.bradford.gov.uk/about-us/population/>

⁸HRPs 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.reference person.

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 assumed a total of 217,930 dwellings⁹. It is estimated that there are 9,623¹⁰ properties (4.4%) which are not occupied, the majority of which are vacant. The SHMA uses a base of 208,307 households across the District⁶ 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 2019 Valuation Office Agency data reports that there are 218,190 homes in the District:
- 18.4% are 1-or 2-bedroom homes, 2.5% are 3-bedroom houses, 13.8% are 4 or more-bedroom houses;
 - 8.2% are 1-bedroom flats, 6.3% are 2 or more-bedroom flats; and
 - 4.8% are 1-or 2-bedroom bungalows and 2.5% are 3 or more-bedroom bungalows.

Terraced homes make up the largest proportion of all homes in the District at 36.4% and stock condition in this sector mainly associated with properties built in the pre-1940 period.

⁹ 2018 Council Tax –compares with a 2018 figure of 216,640 Valuation Office. ¹⁰2018 Council Tax

3. PLANNING FOR MORE HOMES

The Local Plan

- 3.1 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)
 - Addingham Neighbourhood Plan (2020)
- 3.2 Both the Adopted Core Strategy and the two Adopted Area Action Plan's have included public consultation throughout their preparation. In accordance with the NPPF, in undertaking the Partial Review of the Core Strategy (CSPR) and Site Allocations DPD preparation and to speed up the Local Plan, engagement with stakeholders will need to be proportionate and effective.⁷
- 3.3 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. Consultation took place in Autumn 2019 on scoping and preferred options and included a revised Plan period of 2020-2037, a lower minimum housing growth target and re-examined the issue as to whether there are exceptional circumstances to justify changes to the Green Belt. Further consultation on the Core Strategy is scheduled to take place in Autumn 2020 and consultation is also scheduled to take place on the Allocations Development Plan Document (DPD). This DPD will identify the sites for new housing development to meet the housing requirement set out in the CSPR.
- 3.4 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 sets out a revised minimum housing need figure of 1,703 dwellings per annum or 28,951 dwellings. The housing figure has been calculated using the Government's published Standard Methodology, which is currently subject to Government consultation on potential changes.
- 3.5 The CSPR contains a number of headline themes, reflective of the changing wider policy and environmental context to plan-making and includes:
- Balancing growth while protecting local assets

⁷ It is noted that the Government has recently published the Planning White Paper which includes proposals for significant changes to the planning system in England – MHCLG 'White Paper: Planning for the Future' August 2020.

- 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.
- 3.6 One of the key challenges in delivering the CSPR is bringing forward housing growth in areas where volume house builders have not been active – primarily brownfield urban areas, often requiring more regeneration related interventions.
- 3.7 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. The Preferred Option DPD will reflect the strategic approach outlined in the Core Strategy as the most sustainable vision for each settlement area.

Housing Supply

- 3.8 The Council's [5 Year Housing Land Supply Statement](#), published in March 2019, covering the period 2018-23, indicated that the 5-year deliverable supply stood at 2.06 years or 7,421 dwellings.⁸
- 3.9 As set out in table 1b above, for the assessment period. The delivery of new homes in the District has improved year on year and now lies close to the test target. Further monitoring of the available supply is on-going and a revised calculation of the 5 year supply statement will be published soon. This will take account of updated completions data for the period 2019/20, analysis of progress on sites under construction and examination of the permissioned and other deliverable supply following improvements in data intelligence.
- 3.10 Behind the positivity of strong recent delivery and hotspots in the District where build out rates have been stronger than expected, there remain challenges to ensuring that delivery continues to keep pace with need in the locations where new homes are most required. This includes in areas where ongoing clearance is taking place to replace high rise flats with family homes District which over the short-term is likely to subdue the overall net housing completion rates. The impact of COVID 19 on the development sector will also inevitably impact on expected completions for 2020/21 and potentially into the following years dependent upon the extent of the recession, consumer confidence and housing sector impacts, but also of concern is on-going inactivity on good sites originating from the RUDP. The implications of any potential changes to the planning system in England on housing delivery are also unclear over the short-term.

⁸ The assessment in the adopted Core Strategy is different to the HDT which is based on the Standard Method.

- 3.11 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 2019. The new register contains an additional 45 sites than previously identified but with a slightly reduced overall number of sites than in 2018, illustrating strong take up of brownfield opportunities since the previous year. A high proportion of these sites were also permissioned or with an application pending, showing confidence in the delivery of new homes from this land source. Monitoring of [previously developed land](#) is continuing and the Local Plan will continue to support redevelopment opportunities for new homes in urban locations.
- 3.12 The Council's [Authority Monitoring Report](#) provides information on affordable housing completions. Against total completions, affordable housing completions have typically averaged around 18% - 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

- 3.13 Bradford District is characterised by a mixture of urban and rural areas with distinctive character and attractive landscapes. The varied topography of the 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.
- 3.14 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. The topography of the area, natural environment and Green Belt provide a series of constraints to development.
- 3.15 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 has struggled with the multiple challenges of de-industrialisation, deprivation and a lack of market confidence in parts of the District. Historically since 2013, the largest proportion of sites which have typically been completed were those yielding less than 25 homes, with no sites of over 250 homes.

Viability and Deliverability

- 3.16 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 four residential changing zones.
- The highest value changing zone is located across the Wharfedale corridor / north of the District and includes 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.

3.17 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 with stakeholders, noted below in para 3.19 and Appendix 1 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.

3.18 There are no simple solutions to improving housing delivery. As noted in the Letwin Review (2018), a key constraint is the build out rates on large sites primarily delivered by volume house builders 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 house builders 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.

Stakeholder Consultation

3.19 For the first published Housing Delivery Test Action Plan the Council gathered a 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. In summary, consultation headlines included:

- concerns and frustrations with the lack of progress on new site allocations;
- lack of sites generally of the right size and location to be attractive to volume housebuilders;
- positive comments in relation to the development management process but frustrations with some of the outcomes;
- significant reservations about the deliverability, viability and market attractiveness of many brownfield sites, and
- need to develop a dedicated housing delivery team / resource.

Further information on the consultation and responses against key issues is now detailed in Appendix 1.

Challenges and Opportunities

- 3.20 Within the urban areas suppressed market values, low overall confidence and the relatively small number of active national house builders has tended to reduce the level of historic development activity. However more recently, the market has shown some evidence of improvement and local house builders have been taking up a number of the small development opportunities listed in the brownfield register including changes of use. The challenge will be to ensure this particular trend continues.
- 3.21 There are also major opportunities within the District to maximise investment and growth through new strategic transport investment (Northern Powerhouse Rail and MASS Transit), heritage, environmental and city living initiatives and creative area master-planning to provide a catalyst for the transformation and renewal of Bradford City and its wider urban areas and neighbourhoods. The focus of Town Fund initiatives for Keighley and Shipley also provide a stimulus for new growth. The Council's CSPR places a strong emphasis upon brownfield regeneration and the need to uplift market values but also recognises that the District requires a balanced approach to growth across its diverse settlements and communities.

Moving Forward

- 3.22 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 sustainable housing delivery across the District. In accordance with our District Plan, we will continue to work with house builders to deliver high quality, affordable homes where our communities need them, 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.
- 3.23 In addition to strategic transport projects, initiatives supporting this approach include:
- Transforming Cities Fund investment projects;
 - Town Deal Funds for Keighley and Shipley (up to £25m for each settlement in funding);
 - Active travel and greenways – improving options and urban liveability;
 - Maximising growth opportunities around sustainable transport hubs;
 - Spatial Priority Areas (SPAs) to support new investment
 - Housing pipeline – a comprehensive review of sites in Council ownership that have been declared surplus to requirements. This will provide a pipeline of sites suitable for housing to enable a strategic approach to land and assets; one that ensures the best use of Council land, to meet our objectives and maximise housing outputs. This will include assessing the merits of packaging sites for disposal and development as well as derisking and enabling delivery . This supports a more cross departmental and structured approach in establishing a 'pipeline portfolio' of sites linked to both the Local Plan and this Housing Delivery Action Plan

- 3.24 The Council has also produced a new [Homes and Neighbourhood Design Guide](#) 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.

4. MONITORING AND REVIEW

Allocating Resources

- 4.1 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. A proportionate level of resources has also been allocated toward developing a comprehensive up to date Local Plan. Dedicated project management resources which include reporting to a Local Plan Board, consisting of senior officers and the Portfolio Holder for Regeneration, Planning and Transport take place regularly. This is 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.
- 4.2 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. 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.
- 4.3 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.

Review

- 4.4 The Action Plan will continue to 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.
- 4.5 The HDTAP published in 2019 undertook internal and external consultation to identify the barriers to housing delivery. Whilst this consultation has not been revisited, a summary and response is provided to the key issues in Appendix 1. The issues raised have been fully considered by this updated HDTAP.

Appendix 1 – Summary of Stakeholder Survey

- 1 For the first Housing Delivery Test Action Plan 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.

The stakeholders involved in the survey included:

- Seven active developer's / site promoters / house builders
- Three developers who are not active in the District
- Three Registered Providers
- Eight planning officers

Interviews took place in spring / summer 2019 and were undertaken by an independent organisation.

- 2 The feedback received, combined with knowledge of local sites, land and development activity and housing context and aided identification of the issues and barriers to delivery and the actions required to overcome them. Four common themes were identified and are summarised below.

Theme 1 - Planning Policy

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- The continued absence of an Adopted Allocations DPD was considered to be creating prolonged uncertainty and frustration for, house-builders and for investment. **As detailed in the main report, the Council has made further progress in the Local Plan with further consultation due to take place in Autumn 2020. Many brownfield sites can also be progressed regardless of progress on the Local Plan.**

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- Consultees considered that the lack of a five-year housing land supply is impacting upon the potential future pace of housing delivery. There was concern that there was a lack of sites of the right size and in the right locations to attract housing development nor of commercial interest to volume house-builders. **The Local Plan will seek to ensure a 5 year supply of deliverable housing land, with further developable sites for years 6 onwards.**
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Theme 2 - Planning Application Process

- Although the general feedback in relation to the development management process was positive, the lack of resources sometimes results in delays. **It is generally recognised across England that LPAs have struggled with resourcing – the situation in Bradford is not unique.**
 - Whilst growth is an agreed priority for the District as set out within the District Plan, there was frustration where despite officer's recommendations to approve, the Planning Committee issues a refusal. **The Council continues to support members with training on planning and decision-making.**
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Theme 3 – Development Viability & Supply-Side Issues

- Prevailing low values and slower sales rates, in combination with physical constraints, such as contamination, flood risk, archaeology and infrastructure needs, in some parts of the District can adversely impact on development viability. **Steps are being taken to unlock sites and improve other aspects of problematic areas to drive up delivery including identifying sites for access to brownfield site funding through the West Yorkshire devolution deal.**
 - 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. **The Council are looking at ways to de-risk sites in less attractive areas including brownfield sites – part of this approach involves looking at overall place-making.**
 - Historically there has been a low level of activity in Bradford by Registered Providers. A diversified supply of land will enable an accelerated pace of housing delivery. **The Council is undertaking work to identify a pipeline of suitable sites for disposal and options to work further with Registered Providers and regional partners.**
 - Some sites with outline planning permissions are not 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. **For Local plan purposes a detailed assessment of sites is being undertaken for the Allocations DPD, including a review of sites which currently have outline permission. Developers generally undertake a degree of due diligence prior on such factors as viability / deliverability prior to considering planning issues.**
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Theme 4 – Promotion of Sites and Enabling Works

- Responsibility for promoting and enabling new homes construction in Bradford is currently shared across a number of services. A dedicated Housing Delivery Team (HDT) to undertake pro-active site assembly, brokerage between landowners and house-builders, delivery of enabling works and to establish partnering arrangements with house-builders and Registered Providers, should be set up. **Further consideration is currently being given to the establishment of a multi-disciplinary team along these lines.**
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