

Bristol Housing Delivery Test Action Plan

July 2022

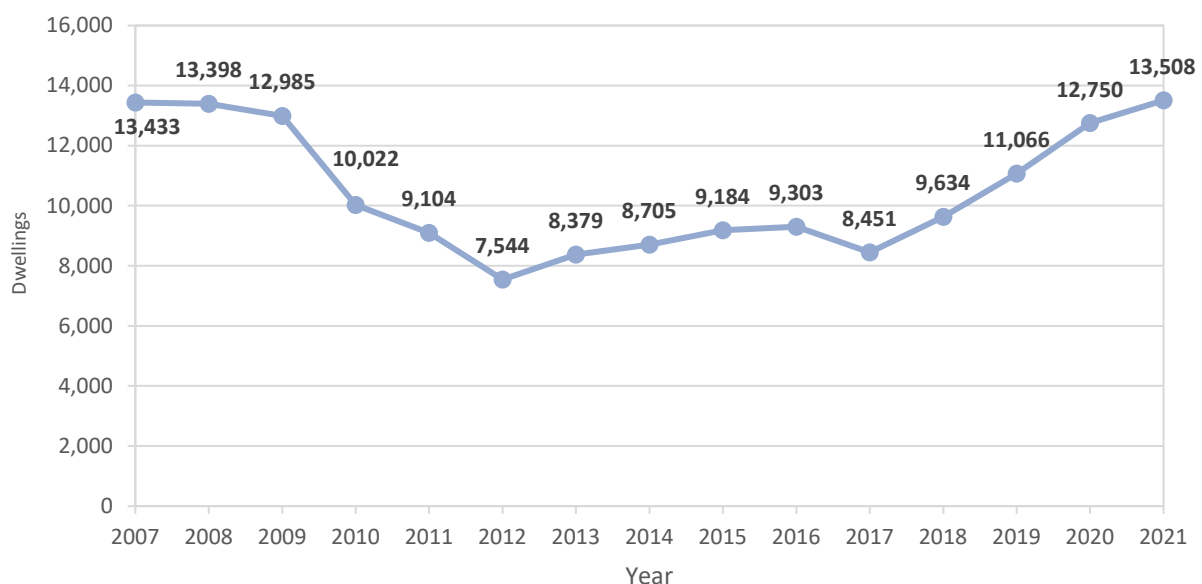


Introduction

Bristol City Council has a strong commitment to delivering new homes. This focus is highlighted in our target of delivering 2,000 new homes each year. Between 2006 and 2021 26,258 homes were delivered, greatly exceeding the annual requirement in the existing Bristol Local Plan. The number of homes with planning permission continues to grow and in March 2020 there were planning permissions and sites agreed subject to s106 agreements in place to enable the delivery of a further 13,508 homes (see figure 1 below). Our Local Plan review sets out a strategy for growth and regeneration that will see the delivery of thousands more new homes in mixed use developments.

Figure 1: Dwellings with planning permission or agreed subject to s106 in Bristol

Source: Bristol City Council



Bristol City Council is in the process of preparing a new Local Plan. Following the halting of work on the Spatial Development Strategy for the West of England Combined Authority Area, it will be for BCC through its Local Plan to set a new homes target for the city. Until this plan is in place the Government's standard method is used to calculate housing needs. This method results in Bristol having a very high level of calculated need which means, in the absence of a strategic plan to distribute housing delivery across the region, that the entirety of the standard method figure is directed to Bristol. This has led to a statistical shortfall in housing land supply, including the need for a Housing Delivery Test Action Plan.

Meanwhile, Bristol City Council is pressing ahead with its active programmes and policies for boosting the supply of homes in the city. This document explains the actions the council is taking to create new homes.

Housing Delivery Test consequences

The Housing Delivery Test is an annual measurement of housing delivery produced by the Department for Levelling Up, Housing and Communities (DLUHC) and previously by the Ministry of Housing, Communities and Local Government (MHCLG). The three

consequences of the Housing Delivery Test results are set out in the National Planning Policy Framework (NPPF). The three consequences are summarised below.

1. Where the Housing Delivery Test indicates that delivery has fallen below 95% of the local planning authority's housing requirement over the previous three years, the authority should prepare an action plan in line with national planning guidance, to assess the causes of under-delivery and identify actions to increase delivery in future years.
2. The five year housing land supply should in addition include a buffer of 20% where there has been significant under delivery of housing over the previous three years this is measured against the Housing Delivery Test where this indicates that delivery was below 85% of the housing requirement.
3. The presumption in favour of sustainable development should be applied to decisions for planning applications involving the provision of housing where the Housing Delivery Test indicates that the delivery of housing was substantially below (less than 75% of) the housing requirement over the previous three years. This means that the policies which are most important for determining the application are deemed out-of-date. However, a recent [planning appeal decision](#) has confirmed that the fact that policies have to be considered out-of-date does not mean that they can carry no weight. To carry weight, policies must be consistent with the NPPF and the closer the policies in the plan are to the policies in the NPPF, the greater the weight that may be given to them. As such, it is perfectly possible for policies which are deemed out-of-date for reasons of an inadequate housing land supply to still carry significant weight.

Housing Delivery Test results

The first 2018 Housing Delivery Test results were published by MHCLG on 19th February 2019; the 2019 results on 13th February 2020; the 2020 results on 19th January 2021 and the 2021 results, by DLUHC, on 14th January 2022.

The 2018 results showed that Bristol had achieved 99% of the requirement and therefore there were no consequences arising from the Housing Delivery Test.

The 2019 results showed that Bristol had achieved 87% of the requirement and was therefore expected to produce an action plan within six months of the publication of the results. The Housing Delivery Test Action Plan was published on the Bristol City Council website on 13th August 2020. This report updates the action plan first published in 2020.

The 2020 Housing Delivery Test results showed that Bristol had achieved 72% of the requirement and the 2021 Housing Delivery Test results showed that Bristol had achieved 74% of the requirement, therefore all three of the Housing Delivery Test consequences applied to Bristol in these years – prepare an action plan (below 95% of the requirement); apply the 20% buffer to the five year housing land supply (below 85% of the requirement); and apply the presumption in favour of sustainable development (below 75% of the requirement).

Five year housing land supply assessment

We published a [Five Year Housing Land Supply Assessment 2020 to 2025](#) in June 2021. This report shows that Bristol had a 3.7 year supply of housing land and therefore cannot demonstrate

a five year housing land supply. Under the NPPF this also means that the presumption in favour of sustainable development should be applied to decisions for planning applications involving the provision of housing. A Five Year Housing Land Supply Assessment for 2021 is currently in preparation.

Housing Delivery Test Action Plan guidance

Guidance on the production of Housing Delivery Test Action Plans has been produced by DLUHC and MHCLG as part of the suite of Planning Practice Guidance.

This plan is set out in two parts:

Part 1: Delivery analysis

Part 2: Actions to support housing delivery

The data in this plan is based on land-use monitoring up to 31st March 2021.

Part 1: Delivery analysis

Housing Delivery Test calculation

The 2021 Housing Delivery Test requirement for Bristol includes the use of the DLUHC and MHCLG Local Housing Need based on the standard method for the calculation. The three-year Housing Delivery Test requirement for the period 2018 to 2021 was 6,197. The requirement used the standard method for all three years: 2018/19, 2019/20 and 2020/21.

For the 2021 measurement, DLUHC have included a reduction in period for measuring total homes required – usually this would be measured over a 3-year period, but an 8-month period has been used for the 2020/21 monitoring year. This is to account for the considerable variations in levels of housing delivery as local planning authorities and construction industry faced disruption on a national, regional, and local level due to the pandemic. Additionally, an 11-month period has been used for the 2019/20 monitoring year. This was to account for disruption to housing delivery and monitoring caused by the first national lockdown in March 2020.

The standard method is based on outdated DCLG 2014-based household projections. The use of the 2014-based projections overstates the housing need as it does not reflect more recent demographic trends.

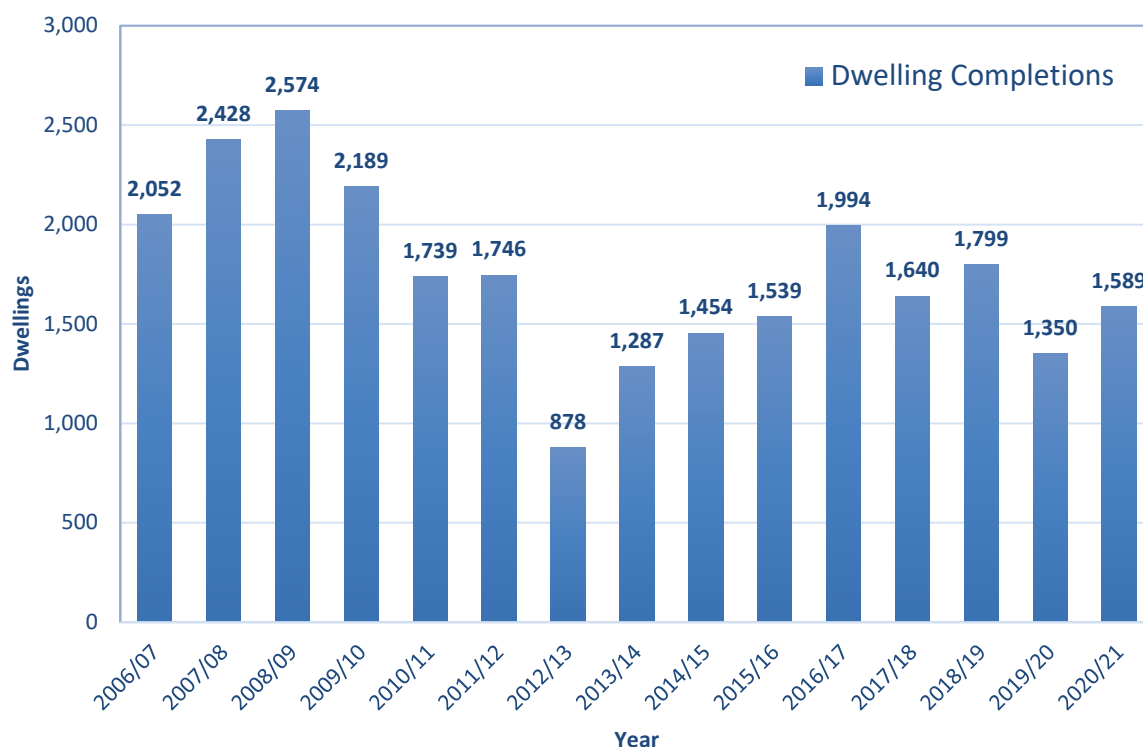
The housing supply measured by DLUHC / MHCLG was 4,611 over the period 2018 to 2021. This has produced a Housing Delivery Test result of 74%.

Housing delivery

Figure 2 shows that whilst there has been a recovery in dwelling completions since 2012/13, following the global financial crisis in 2007-2008, there has been a downward trend in completions over the last three years, albeit with a partial recovery over the last year. Patterns of housing delivery in Bristol appear to be closely related to the state of the economy and the housing market.

Figure 2: Dwelling completions per year (net) in Bristol 2006-2021

Source: Bristol City Council



Even though the number of dwelling completions figures has fallen over the three-year period, the number of homes with planning permission continues to grow and in March 2021 there were planning permissions and sites agreed subject to s106 agreements in place to enable the delivery of a further 13,508 homes (see Figure 1); the highest number in the period beginning in 2007. This suggests that the available capacity for new homes is not being delivered by the housing sector, possibly due to economic uncertainties.

The most significant potential causes of the failure to deliver the homes required in Bristol appears to be the inability of the housebuilding industry to deliver the planning permissions which have been granted and increased uncertainty in the market due to Brexit and Covid-19.

The biggest immediate impact on housing delivery both within Bristol and nationally comes from the combined effects of Brexit, the Covid-19 pandemic and potentially the cost of living crisis. The construction sector is seeing a significant increase in costs of materials, supply chain delays, and delays on site through the availability of construction workers.

Part 2: Actions to support housing delivery

This Housing Delivery Test Action Plan summarises the actions Bristol City Council is taking to boost housing delivery and show how we aim to achieve our target of 2,000 homes per year.

Development planning

Bristol and neighbouring authorities in the West of England are prioritising the delivery of updated Local Plans following the cessation of work on a new Spatial Development Strategy. These will support the delivery of new homes in the area.

Bristol Local Plan

Bristol has an adopted suite of development plan documents. The adopted [Bristol Local Plan](#) comprises the Core Strategy (adopted June 2011), the Site Allocations and Development Management Policies (adopted July 2014) and the Bristol Central Area Plan (adopted March 2015). These documents contain site allocations which enabled the delivery of over 8,000 new homes.

Work to review the Local Plan is continuing and public consultations took place between February and April 2018, and March and May 2019. Progress has been delayed by the withdrawal of the Joint Strategic Plan and the West of England Combined Authority Spatial Development Strategy. The anticipated timetable for reviewing the Bristol Local Plan is as follows:

2022	Further Regulation 18 consultation undertaken reflecting cessation of work on SDS and other changes.
2023 (Spring)	Publication version to be approved and made available for comment (Regulation 19).
2023 (Autumn)	Submission of plan to Secretary of State / Planning Inspectorate.
2024	Examination and adoption.

The Bristol Local Plan Review (March 2019) included proposals for the delivery of at least 33,500 homes by 2036. It sets out growth and regeneration areas with capacity for delivering over 11,500 new homes, 70 development allocations with the potential for a further 4,400 homes and policies which prioritise sustainable housing development as part of a strategy of inclusive growth. Following the halting of the SDS it will be for the Bristol Local Plan to establish an appropriate housing target.

[Progressing Bristol's Development](#) was published in October 2020, this is a statement about planning in Bristol which shows how we will aim, when making planning and development decisions, to balance existing local plan policies with our emerging plans, new evidence, changes to national planning policy and evolving development issues across the city.

Bristol City Council housing delivery

In February 2022 the city council Cabinet approved the adoption and implementation of an updated Housing Delivery Plan for 2022-2025: [Project 1000](#). This established a new approach to accelerating housing delivery in the city to meet Mayoral aspirations for the delivery of 1000 affordable homes a year from 2024. This built on the 2017 Housing delivery plan which had introduced five key actions to be taken by the council to improve the delivery of housing:

- a) Creation of a single, multi-disciplinary Housing Delivery Team;
- b) Active management of a single annual housing delivery programme;
- c) Simplified strategic governance and decision-making;
- d) Interventions to remove barriers and accelerate delivery; and
- e) Revised key policy and guidance documents, change to be adopted and implemented.

The plan introduced improvements to city-wide systems to facilitate increased delivery of homes by developers; and changes to Bristol City Council's internal development process to accelerate the delivery of housing on council owned land. The 2017 Plan saw a year-on-year

upturn in affordable housing delivery, with figures noticeably picking up pace during the past four years: there were 260 built in Bristol during 2018-2019; 312 in 2019-20, 400 in 2020-21 and 450 in 2021-22. Project 1000 now seeks to expand on this by accelerating the delivery of new affordable homes.

Funding

The City Council directly invests significant financial support into its Housing Delivery Programme, including support to implement a new housing delivery vehicle (Goram Homes), funding for projects related to the council's Housing Infrastructure Fund, a commitment to fund the direct delivery of Council Homes and direct funding support for the delivery of affordable homes.

The council will continue to support its wide range of affordable housing provider partners to deliver new homes, whilst also accelerating its own direct delivery of council homes through an investment of £1.8 billion that will see over 2000 built in the next seven years.

The Council is targeting the use of capital funding to third party affordable housing providers as gap funding; stepping in to ensure delivery where other forms of public subsidy are not available or are insufficient to deliver on an affordable housing project. This ensures partners maximise their own investment into projects and make the most of funding available from Homes England.

Structure and governance

A dedicated Housing Delivery Team was established in 2017. This multi-disciplinary team is responsible for delivering an ambitious annual target of building 2,000 homes and meeting the Mayoral aspiration that 1,000 affordable homes will be delivered a year by 2024/25. The Housing Delivery Team works across the council and with external partners to deliver an annual housing delivery programme with performance targets. The Housing Delivery Team focusses on accelerated delivery of priority development sites which are agreed annually. The team commissions professionals and support services for housing development including property, legal, highways, planning and city design. This is to ensure housing delivery is directly supported with dedicated professional services.

A Housing Delivery Board (HDB) has been established, chaired by the Executive Director of Growth and Regeneration to monitor performance and oversee delivery of the ambitious targets. The HDB considers progress on key housing sites in the city and forms a key part of the strategic decision making pathway around housing delivery. A new risk-based approach to managing delivery is being established, supported by a cross-service working group that is empowered to address constraints to delivery.

The Council's Housing Strategy and Enabling Team sits within Housing Delivery Team and focusses on maximising delivery of affordable homes in the City by third party providers. It does this by working in collaboration with Development Management to secure planning policy requirements for affordable housing and with Planning Policy to develop the framework for the delivery of affordable homes, supporting the Council's housing association partners to bring forward their own sites, leading on the community led housing programme, supporting specialist housing provision and administering the Council Affordable Housing Grants programme.

The Construction and Development Team also sits with the Housing Delivery Team and focuses on the delivery of new homes under its HRA development programme and the strategic master planning and place making of specific areas within the city.

Housing Programme

The Housing Delivery Team is responsible for delivering the Housing Programme; this includes enabling, direct delivery/acquisition, grant funding, land release, and place making.

Lockleaze

A number of [housing development sites in Lockleaze](#) are being progressed through working with Registered Providers, HRA Delivery and Goram Homes. These include:

- Shaldon Road, where Brighter Places are working with Bristol Community Land Trust to deliver 50 affordable homes, most of which have now been completed with the remaining 18 units to be completed in 2022;
- Bonnington Walk, where the council has worked to deliver 185 modular homes via the Housing Festival and have now sold the site to Legal and General with agreement from a registered provider to purchase the section 106 affordable homes and deliver additional homes with subsidy;
- Outline planning permission has been granted for 60 Extra Care units at the Blake Centre. Goram Homes Ltd and council officers are currently working to select a partner to who will design/build and operate the completed Extra Care Housing;
- Romney House, where the Council secured outline planning, is now being taken forwards by Goram Homes in partnership with Vistry.
- An outline planning application was also submitted for homes on the Dovercourt Depot site earlier this year.

Southmead

Negotiations to implement [Southmead regeneration plans](#) are ongoing. This includes the delivery of Glencoyne Square which currently has planning permission for 120 new homes.

Hengrove Park

[Development proposals at Hengrove Park](#) are progressing. The council has secured outline planning consent for the Hengrove Park scheme which will deliver 1,435 new homes as part of a mixed use development, in a phased delivery programme over the next 5 to 10 years. The development is being brought forward by Goram Homes, the Council's wholly-owned local housing company and a development partner is in the process of being selected.

Once the development partner is appointed the final phasing programme for delivering the overall Masterplan development will be agreed, and a Reserved Matters planning application will be submitted. Planning permission has already been granted for an initial 53 homes on the 'Eastern Bookend' site off Hengrove Boulevard, which will form part of this wider development.

Knowle West

The Council worked with the community on the [Knowle West Regeneration Framework](#). This led to a series of sites being allocated within Bristol's Local Plan in 2014. The Housing Delivery Team have been working with the community and other City partners to deliver housing here. This includes:

- HRA Delivery (see below) on several sites to deliver new Council homes such as Leinster Avenue (planning recently approved for 71 new Council homes and work underway to procure the contractor, with start on site expected early 2023);

- Airport Road 'BokLok' development with 173 new homes under construction;
- Work on regenerating Filwood Broadway including changes to the public realm and delivery of new homes other key sites.

Housing Revenue Account (HRA) delivery - New Council Homes Programme

Bristol City Council has retained its housing stock and currently owns, manages, and maintains around 28,000 homes across the city.

Since the Government lifted the borrowing cap for Local Authorities, it has allowed us to borrow more to invest and increase the size of our [new build affordable housing programme](#).

The Housebuilding Programme is a rolling programme with ambitions over the coming years to double its size. The programme is funded mainly by the use of reserves and prudential borrowing in our Housing Revenue Account (HRA), together with the use of Right to Buy Receipts, Homes England Grant, and in some cases, cross-subsidy generated from the sales of open-market homes.

Work on this programme began in 2014, with the aim of utilising smaller brownfield and back-land sites across the city to provide new, high quality affordable homes for the people of Bristol.

By focussing on such sites we aim to:

- Make the best use of land we already own therefore reducing the cost of development;
- Bring non-residential land forward for housing delivery at pace;
- Improve areas for local communities;
- Address the demand for housing, especially affordable housing in Bristol; and
- Reduce instances of anti-social behaviour that derelict sites can attract.

In order to scale up our activity, our future housebuilding programme will also start to look at larger development opportunities with an introduction of homes for shared ownership (part rent/part buy). We will also be adding new work streams to our housebuilding programme through the acquisition of affordable homes from Goram Homes, the commencement of an estate regeneration programme, and the 'buy-back' of former Right to Buy properties.

A significant number of homes are being delivered through the Housing Revenue Account. 133 homes at Ashton Rise have now been completed, taking the total number of new homes built since the programme began to over 280 with a further 319 homes on eight sites benefitting from planning permission, 151 of which it is anticipated will be completed in 2024. Planning applications have been submitted on a further 5 sites with preparation work underway to enable applications on an additional four sites over the coming months. In addition, the houses delivered at the 'Bookend Sites' element of Hengrove Park Masterplan (see above) will be purchased by the HRA. Other housing sites are being progressed via the Innovate UK Bid.

Bristol Housing Festival

The [Bristol Housing Festival](#) is a five year project (2018-2023) exploring innovative solutions to the housing crisis. The Festival has piloted a number of projects across the city in

partnership with the city council and other organisations. These include hosting events, round table discussions and public exhibitions of the latest innovation in off-site manufacturing solutions and modern methods of construction.

Innovate UK grant - Modern Methods of Construction

In April 2020, a consortium of partners led by YTKO and including Bristol City Council, Bristol Housing Festival, BRE, and 9 leading modular housing companies were awarded an [Innovate UK grant](#) for their project, Enabling Housing Innovation for Inclusive Growth. This project aimed to further the work of the Bristol Housing Festival by unlocking the current barriers to delivery, enable the council and its partners to examine how using Modern Methods of Construction (MMC) can help to reduce the costs of housing production and increase the speed of delivery. There are three parts to the successful bid: demonstrator sites; council innovation enabling model; and a digital optioneering toolkit.

The Climate Smart Cities Challenge

Following a bid submitted by Bristol Housing Festival and Bristol City Office, Bristol was chosen in April 2021 as one of four host cities in the [Climate Smart Cities Challenge](#). The project partners include Nesta Challenges, UN-Habitat, Dark Matter Labs, Viable Cities, and others. It is a city-based open innovation competition that invites technologists, businesses, and investors to develop, test and scale cutting-edge solutions to reduce greenhouse gas emissions. It will build on the learning from the Innovate UK funded project above by inviting innovators to contribute to a new model for delivering affordable, zero carbon homes in Bristol, particularly addressing the viability challenge to deliver affordable, carbon zero homes at pace.

We Can Make

[We Can Make](#) is a Bristol-based Community Land Trust exploring how communities can lead the development of homes and places and is supported by the Nationwide Foundation and Homes England. We Can Make focuses on unlocking micro-sites for affordable housing and using digital design and construction technology to empower communities to create the spaces and places they need. The first two We Can Make homes were completed in June 2022 on micro-plots in the garden of 2 council homes. Council approval, secured at the end of 2021, allowed the release of these plots and also approved the disposal of up to an additional 14 plots of land to deliver further homes.

Local housing company (Goram Homes)

[Goram Homes](#) was founded in 2018 by Bristol City Council to increase the provision of new homes in the city and to meet affordable housing requirements without compromising on build quality. The company's ambition is to develop 2,500 homes in Bristol by 2025.

The company works in partnership with the council and private sector on commercial projects that will deliver appropriate financial returns to its shareholder, Bristol City Council. Goram Homes is a subsidiary of Bristol Holding Ltd, wholly owned by Bristol City Council.

Goram Homes is committed to providing high quality, well designed, homes and creating developments that help people thrive. Goram Homes will actively create opportunities for apprenticeships and work experience, and use local labour and local supply chain partners wherever possible.

In north Bristol, Goram Homes is working in partnership with Vistry Homes to deliver 268 new homes at One Lockleaze (Romney Avenue) and submitted a planning application on the Dovercourt Depot site earlier this year. Goram are also acting as lead developer to ensure the delivery of an extra care facility at the Blake Centre (60 units).

They have also submitted a planning application for homes at the Caravan Club site at Baltic Warf and, working with the Bristol Housing Festival and Redcliffe Neighbourhood Forum, have announced a design competition shortlist for Redcliffe Way. A winner will be announced at the end of the summer following community engagement and further development of ideas.

In South Bristol a development partner is in the process of being selected to deliver the development of 1,435 homes at Hengrove Park and an outline planning application for 200 homes (including an extra care facility) has also been submitted at New Fossey Road, Hengrove and Whitchurch Park. Several other housing development sites across Bristol are also being progressed through public consultation, development frameworks and design competitions.

Other actions

City Centre Framework

The [City Centre Framework](#) was adopted by Bristol City Council's Cabinet on 14th July 2020. This sets out a vision for the transformation of Bristol's city centre, underpinned by an ambition to create a healthier, sustainable and climate resilient city. The City Centre Framework will assist in making best use of land and diversifying the city centre, including the provision of hundreds of new homes. Following on from the Framework the council is commissioning a [City Centre Development and Delivery Plan](#).

Urban living: Making successful places at higher densities - Supplementary Planning Document

The council has adopted a supplementary planning document [Urban living: Making successful places at higher densities](#) which supports the local plan in making successful places and securing the best use of urban land. This practical guidance for developers aims to optimise densities so that efficient use of land can contribute to boosting the supply of new homes whilst ensuring high standards of design and placemaking. It has been successful in encouraging numerous new proposals for well-designed schemes which make effective use of sites across the city.

Areas of Growth and Regeneration

There are a number of emerging frameworks and master plans within the Areas of Growth and Regeneration working in partnership with developers, partners and local stakeholders in the city which will support the delivery of thousands of additional homes. These have a role in bringing forward opportunities for new homes at sustainable locations in mixed-use communities well connected to the public transport, cycling and pedestrian infrastructure.

£95m of funding for [Temple Quarter](#) was recently announced to kickstart Phase 1 of the project focused on areas immediately around Bristol Temple Meads station. The funding will enable the transformation of the area into a gateway for Bristol and the West of England enabling Bristol Temple Meads to become a 21st century transport interchange, whilst also unlocking the delivery of 2,500 new homes by 2030 as well as future plans to develop

approximately 70 hectares of land across St Philip's Marsh in phase two of the regeneration scheme.

Public and stakeholder engagement is also proposed to take place on [Frome Gateway](#), [Western Harbour](#), and Central Bedminster to support emerging work within these areas.