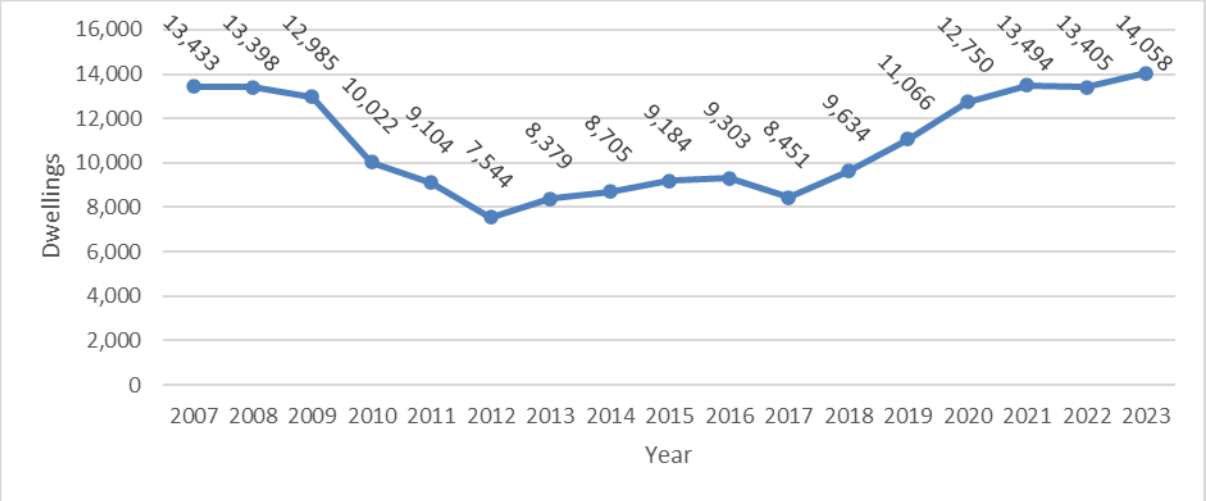
Bristol Housing Delivery Test Action Plan June 2024

Introduction

Bristol City Council has a strong commitment to delivering new homes. This focus is highlighted in the emerging local plan, which sets a housing requirement of 1,925 new homes each year, our highest ever by some margin. Between 2006 and 2023 30,420 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 2023 there were planning permissions and sites agreed subject to s106 agreements in place to enable the delivery of a further 14,058 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. 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. Where the Housing Delivery Test indicates that delivery has fallen below 85% of the housing requirement over the previous three years, the authority should also include a buffer of 20% to their five year housing land supply.

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 below 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; the 2021 results, by DLUHC, on 14th January 2022; and the 2022 results on 19th December 2023.

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.

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).

The 2022 results showed that Bristol had achieved 88% of the requirement and therefore only the action plan consequence applies. This report updates the action plan first published in 2020 and revised in 2021.

Five year housing land supply assessment

Under paragraphs 77 and 226 of the NPPF, Bristol City Council, as a local planning authority with a plan that has been submitted for examination, is only required to demonstrate a 4-year supply of housing land against its 5-year requirement.

The Bristol Strategic Housing Land Availability Assessment (SHLAA) (April 2024) identifies a supply of 12,682 homes, equivalent to a 6.59-year supply against the emerging local plan housing requirement. However, until the new local plan is adopted, the NPPF requires the 4-year land supply to be demonstrated against the Government's Standard Method assessment of housing need instead.

The Standard Method housing need figure for Bristol is currently 3,378 homes per year, or 16,890 homes over a 5-year period. This results in a 3.75-year supply of new homes. Since this falls short of the 4-year supply required by the NPPF, the presumption in favour of sustainable development applies to decisions for planning applications involving the provision of housing (NPPF paragraph 11).

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 2023.

Part 1: Delivery analysis

Housing Delivery Test calculation

The 2022 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 2019 to 2022 was 6,093. The requirement used the standard method for all three years: 2019/20, 2020/21 and 2021/22.

For the 2022 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 Covid-19 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. No adjustment was made in the 2021/22 monitoring year.

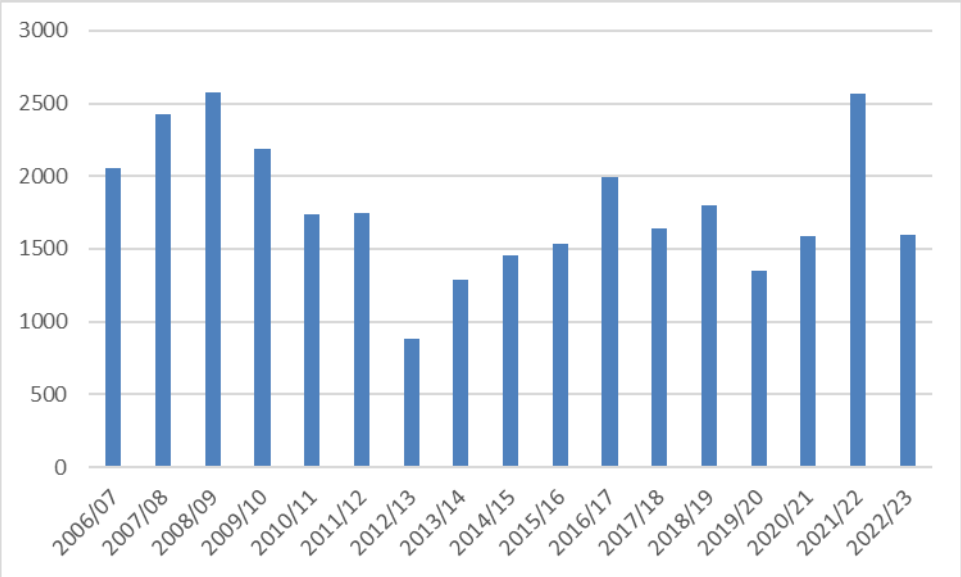
The standard method is based on outdated DCLG 2014-based household projections which do not reflect more recent demographic trends. It also includes an additional 35% uplift for the twenty largest cities and urban centres in England (including Bristol) which represents a contribution to wider national housing need rather than genuine locally-derived housing need.

The housing supply measured by DLUHC / MHCLG was 5,371 over the period 2019 to 2022. This has produced a Housing Delivery Test result of 88%.

Housing delivery

Figure 2 shows that whilst there has been a recovery in dwelling completions since 2012/13, this has fluctuated in a way that appears to be closely related to the state of the wider economy and the housing market. A particular spike in completions in 2021/22 may relate to delays to development in the previous two years as a result of the pandemic.

Figure 2: Dwelling completions per year (net) in Bristol 2006-2023
Source: Bristol City Council



Even though the number of dwelling completions figures has fluctuated over the three-year period, the number of homes with planning permission continues to grow and in March 2023 there were planning permissions and sites agreed subject to s106 agreements in place to enable the delivery of a further 14,058 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.

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 housing requirement of 1,925 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. The local plan was submitted to the Secretary of State on 25 April 2024. Examination hearings are expected to take place in summer/autumn 2024 with adoption intended for spring 2025.

The emerging local plan includes proposals for an average annual delivery of at least 1,925 homes per year until 2040, the highest annual housing requirement the council has ever pursued. It sets out areas of growth and regeneration with capacity for delivering over 20,000 new homes (as set out in the SHLAA), development allocations with the potential for almost 4,000 additional new homes and policies which prioritise sustainable housing development as part of a strategy of inclusive growth.

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

The council is actively involved in funding and building new homes in Bristol, with well-established development projects that are beginning to produce results in Filwood, Hengrove Park and Southmead.

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 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.

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

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.

Around 350 new homes have been delivered through the Housing Revenue Account over the last few years. We currently have a rolling 5 year programme to deliver a further 3000 homes, we currently have with a further 20 developments at various stages of construction delivering over 700 in the next 18 months. We have a further 16 sites in the early stages of the development programme with these expected to be submitting to Planning over the next 18 months. Within this delivery programme we are acquiring the affordable homes from the Goram Homs developments at Hengrove Bookends and phase 1b, Dovercourt Depot, New Fosseway and Romney House.

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.

Goram Homes is now progressing development for an extensive list of development sites, most recently obtaining planning permission for 166 new homes at Baltic Wharf in April 2024.

Regeneration projects

The council is also actively involved in facilitating the development of new homes by the wider development industry through focused work on Bristol City Centre and a number of areas of growth and regeneration as set out in the emerging local plan.

City Centre Development and Delivery Plan

The City Centre Development and Delivery Plan was adopted in November 2023 and sets a framework for the transformation of a large area of the city centre focused around Broadmead, Castle Park and the Old City, including the development of approximately 2,500 new homes.

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.

The council's Regeneration web page sets out further details of these area-based projects.

To date the following frameworks have been completed:

- Bedminster Green place-shaping framework (February 2019)
- Whitehouse Street regeneration framework (March 2023)
- Temple Quarter development framework (May 2023)
- Frome Gateway spatial regeneration framework (January 2024)

Work is ongoing to develop masterplans for the following areas:

- Bristol Temple Quarter
- St. Philip's Marsh

- Western Harbour

£95m of funding for Temple Quarter was announced in June 2022 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. Work has commenced on the construction of a new university campus in Temple Quarter, complemented by a new £23m eastern entrance to Bristol Temple Meads station.

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.