



Kirklees Housing Delivery Test Action Plan

July 2022

Kirklees Council Housing Delivery Test Action Plan (July 2022)

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Executive summary

The government has introduced a Housing Delivery Test as part of a commitment to boost housing delivery across England. To meet the minimum requirement of the 2021 Test, the number of new homes built over the past three years must be at least 75% of those needed. In addition, where the number of homes built within the past three years falls below 95% of the homes needed, an Action Plan must be produced to explore how barriers to delivery will be addressed.

On 14th January 2022, the government published the 2021 Housing Delivery Test results. The Kirklees result for the three years to 2021 is 87% which is above the threshold for passing the test but as delivery is below 95% this means an Action Plan is required.

This document sets out the required Action Plan. It explores issues relating to housing delivery in Kirklees and sets out a series of actions including the delivery of the Local Plan and exploring issues where development has stalled. Consideration is also given to the planning process, potential for housing in town centres and ensuring timely infrastructure delivery. Kirklees Council has continued to implement a number of these actions to improve housing delivery within the district.

The results of the 2022 Housing Delivery Test are expected in November 2022 and will indicate whether a further Action Plan will be required.

1. Introduction

- 1.1 The government has set out a commitment to ensure more homes are delivered across the country to meet needs. The Housing Delivery Test has been introduced to monitor the progress towards these housing growth aspirations in each local authority area. The test sets percentage targets for the number of homes built compared to housing needs during a rolling three-year period. Where delivery fails to meet the percentage target, planning permission for housing should normally be granted unless the National Planning Policy Framework (NPPF) protects land for a clear reason (e.g., green belt) or the adverse impacts significantly and demonstrably outweigh the benefits of granting permission.
- 1.2 In addition, if delivery falls below 95% of housing needs over a three-year period, an Action Plan must be produced to explore barriers to delivery and set out actions to address such issues. This document fulfils that requirement and, in response to the housing challenge, Kirklees Council has already shown a commitment to increasing housing delivery through a number of initiatives set out in this Action Plan. The adoption of the Kirklees Local Plan (27th February 2019) was a key part of this commitment as it outlines how 31,140 new homes will be delivered during the plan period from 2013-31.

Covid-19 Adjustment for the 2020 & 2021 Housing Delivery Test Measurement¹

- 1.3 To reflect the temporary disruption caused to housing delivery by national lockdowns, the period for measuring the homes required in 2020/21 has been reduced by 4 months. A 1-month reduction in the period for measuring the homes required in 2019/20 also still applies.

2. Housing Delivery Test

- 2.1 The Housing Delivery Test seeks to measure whether the number of homes built is 'substantially less' than the homes needed in each local authority area and ensure actions are considered to address delivery issues. The criteria for whether delivery is 'substantially less' than the housing needed is where delivery falls below 75% of housing need over the previous three years.
- 2.2 Where delivery is 'substantially less' than the housing required, planning permission for housing proposals should normally be granted unless the National Planning Policy Framework (NPPF) protects land for a clear reason (e.g. green belt) or the adverse impacts significantly and demonstrably outweigh the benefits of granting permission. This has similar implications as being unable to demonstrate five years supply of deliverable housing land.
- 2.3 In addition, where delivery falls below 95% of the housing required over a rolling three-year period, the council must prepare an Action Plan to assess barriers to delivery and identify actions to overcome these issues.

¹ <https://www.gov.uk/government/publications/housing-delivery-test-2021-measurement/housing-delivery-test-2021-measurement-technical-note>

Kirklees Housing Delivery Test result (2021)

Housing Need

- 2.4 As the Kirklees Local Plan (adopted February 2019) is less than five years old, the Housing Delivery Test needs are based on the lower of the Local Plan housing requirement (1,730 new homes per annum) or Local Housing Need. Table 1 demonstrates that the expected household growth is lower from the Local Housing Need calculation compared to the Local Plan requirement of over the same period. The Local Housing Need expected household growth of 4,325 new homes over 3 years is therefore used in the Housing Delivery Test calculation, taking into account the Covid-19 adjustment.

Table 1 – Kirklees Housing Delivery Test need

Year	Local Plan housing requirement source	Local Plan expected household growth	Local Housing Need Information source	Local Housing Need expected household growth
2018/2019	Adopted Local Plan (February 2019)	1,730	2014-based projections	1,682
2019/2020	Adopted Local Plan (February 2019)	1,730	2014-based projections	1,534 ²
2020/2021	Adopted Local Plan (February 2019)	1,730	2014-based projections	1,109 ²
Total		5,190		4,325

Housing Delivery

- 2.5 Within the Housing Delivery Test the net additional number of homes is calculated by adjusting the net housing completions to take account of gains/losses in communal accommodation. The calculation set out in table 2 converts the number of bedrooms in such communal accommodation into dwelling numbers using national averages for household size. Different conversion ratios are used depending on whether the communal bedrooms are care homes or student accommodation.

² Covid-19 Adjustment (see paragraph 1.3)

Table 2 – Housing Delivery Test homes built (Kirklees)

	Net housing completions (net)	Gains/losses of bedrooms in communal accommodation	Adjustment to equivalent number of dwellings	Adjusted net additional homes
2018/2019	1,550	80	44.44 ³	1,594
2019/2020	1,131	18	10.00 ⁴	1,149
2020/2021	1,021	0	0	1,021
Total				3,764

Delivery Test result

- 2.6 The Housing Delivery Test result is the percentage of the adjusted net additional homes (table 2) compared to the expected household growth (table 1). The 2021 Housing Delivery Test result for Kirklees (table 3) therefore shows that **87%** of the required housing has been provided over the last three years. This exceeds the 75% Test threshold but as delivery is below 95% an Action Plan must be produced within 6 months of publication of the Housing Delivery Test results (i.e. by 14th July 2022).

Table 3 – Housing Delivery Test result for Kirklees

Adjusted net additional homes	Expected household growth	Kirklees HDT result
3,764	4,325	87%

Kirklees Action Plan context

- 2.7 The purpose of this action plan is to explore housing delivery evidence in Kirklees including identifying barriers to delivery and potential actions to address identified issues.
- 2.8 This Action Plan uses a range of information sources including examining past annual housing completions and planning permission trends as well as considering the status of the development plan for Kirklees. The Kirklees Local Plan was adopted (February 2019) and sets out a range of housing allocations (and a windfall allowance) to demonstrate there is sufficient housing capacity within the plan to meet housing needs during the Local Plan period. To reach this point there was significant consultation throughout the various stages of the Local Plan process including involvement of a range of stakeholders who influence delivery rates in the Local Plan Examination in Public.
- 2.9 Following the adoption of the Local Plan there is a focus on ensuring sufficient housing delivery to meet the new housing requirement. This Action Plan examines the reasons why housing delivery has been lower than required in recent years through examining past delivery rates, permissions granted, the planning process and availability of sites.

³ 2018/2019 gain of 80 communal care bedrooms, adjusted to equate this to the average number of adults in all households in England (1.8 ratio) i.e. $80 / 1.8 = 44.44$ dwellings equivalent

⁴ 2019/2020 gain of 18 communal care bedrooms, adjusted to equate this to the average number of adults in all households in England (1.8 ratio) i.e. $18 / 1.8 = 10.00$ dwellings equivalent

Kirklees Council corporate priorities

- 2.10 The Council has a shared vision, set out in the Council's Plan 2021/23⁵, to create a district which combines a strong sustainable economy with a great quality of life – leading to thriving communities, growing businesses, high prosperity, and low inequality where people enjoy better health throughout their lives. Housing contributes to a number of the Council's and its partners' shared outcomes, especially around improving people's health and wellbeing, the quality of the places where they live and strengthening people's sense of economic confidence.
- 2.11 The Housing Strategy 2018-23 reflects the achievements of these outcomes and the council's commitment to housing growth in the district. It aims to see Kirklees offering a range of good quality mixed tenure housing, where people live in suitable, warm, safe, and affordable homes in attractive and prosperous places throughout their lives, including the development of more specialist housing for people with disabilities and for older people. The Council will continue to deliver its Housing Growth Programme.
- 2.12 The recently adopted Kirklees Local Plan articulates the spatial vision for Kirklees and includes the allocation of a significant amount of land for new housing in the district to meet needs between 2013 and 2031.

⁵ [Our Council Plan 2021-23 | Kirklees Council](#)

3. Delivery issues

Number of new homes built

- 3.1 Figure 1 shows that housing delivery has increased on average in recent years with the highest net completions for 10 years in 2018/19 with net completions slightly lower in the previous two years. This will need to increase further to ensure sufficient delivery to meet the Local Plan requirement of 1,730 per annum. Figure 2 shows significant delivery on brownfield land during the same period although this has decreased in recent years as such sites are developed for housing. The council maintain a Brownfield Land Register showing land within the district which is potentially suitable and available for housing-led development⁶.

Figure 1 – Net number of homes built (completions) (2008/09 – 2020/21)

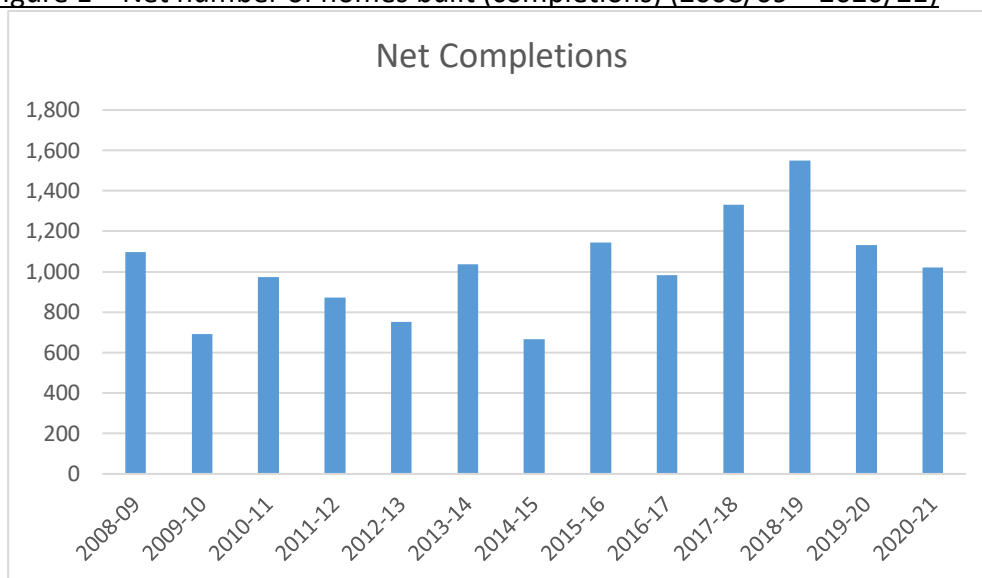
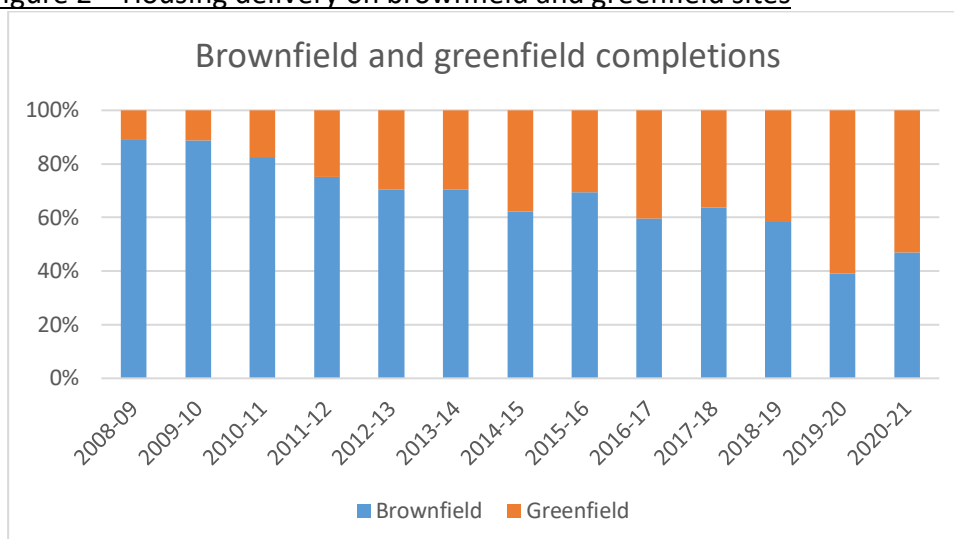


Figure 2 – Housing delivery on brownfield and greenfield sites

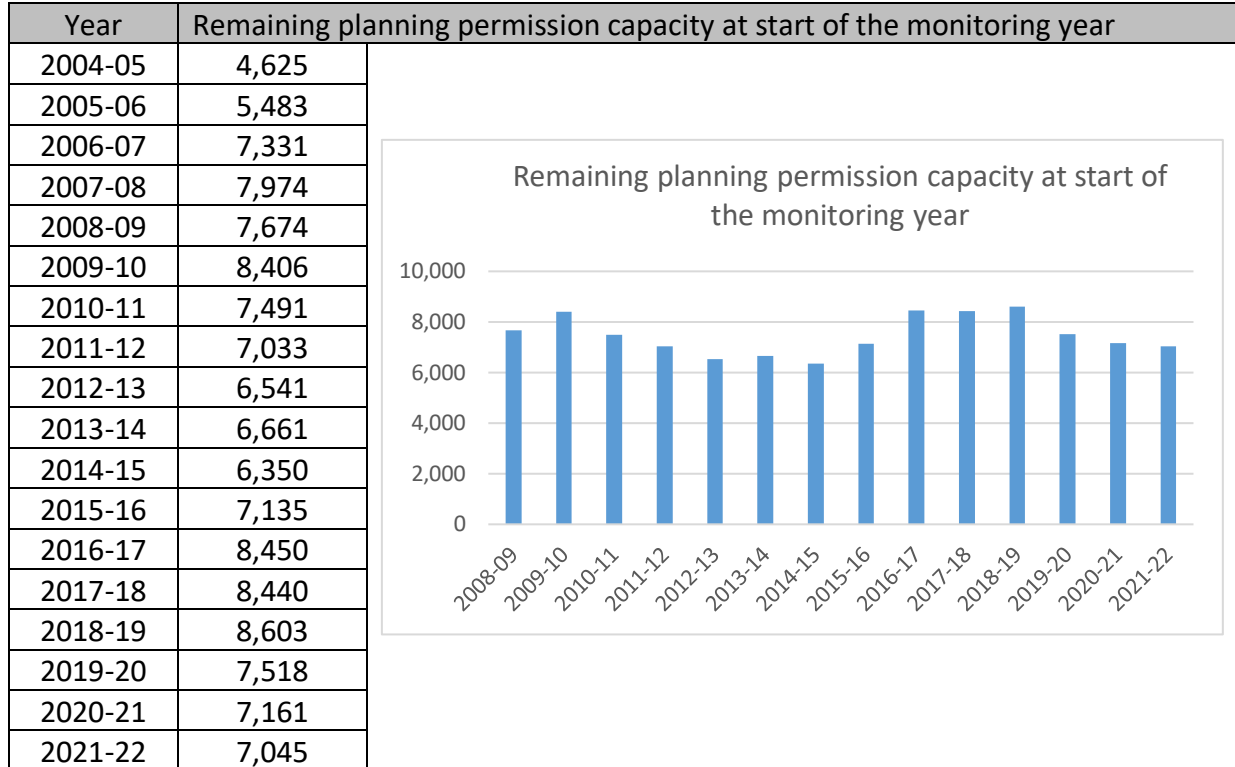


⁶ Kirklees Brownfield Land Register (<https://www.kirklees.gov.uk/beta/planning-policy/brownfield-land-register.aspx>)

Housing land supply

3.2 Figure 3 shows the number of new homes with planning permission in Kirklees at the start of each financial year. This shows the lowest capacity was 4,625 new homes in 2004-05 and that the most recent capacity with planning permission at the start of 2020/21 was 7,045 new homes. This has been accompanied by an increased level of pre-application advice requests for residential development.

Figure 3 – Planning permission housing capacity yet to be built



3.3 The number of new homes with planning permission has been affected by a number of factors during the period shown in figure 3. The Kirklees Unitary Development Plan (adopted in 1999) had become out of date resulting in a shortage of housing land, particularly in relation to larger sites. During this period there were also issues relating to site viability, site constraints and general market conditions. The lack of deliverable housing supply led to a presumption in favour of sustainable development which has been a factor in increased planning permissions capacity in recent years. This increase in permissions is expected to be maintained to reflect the increased housing capacity and certainty provided by the recently adopted Local Plan. A key challenge is to maintain a five-year supply of deliverable housing capacity to facilitate housing delivery.

3.4 The Local Plan adoption created challenges such as ensuring sites deliver as expected including strategic sites which are expected to deliver significant numbers of new homes during the plan period. There is the challenge delivering these sites and associated infrastructure set out in the Local Plan evidence. Further windfall sources should also be explored to further boost flexibility such as potential residential uses within town centres. The Planning Service needs to continue to determine planning

applications within agreed timescales and to respond effectively to pre-application advice requests.

- 3.5 Covid-19 has resulted in disruption to local authority planning services, developers, and the construction sector. Paragraph 1.3 sets out how this year's Housing Delivery Test results have been adjusted to reflect this issue. It will be a challenge for Kirklees to understand and respond to the potential impact on housing supply and delivery in the district during the next monitoring period.

4. Key Actions

- 4.1 The council is committed to improving the delivery of new homes across Kirklees and a series of actions are already being implemented. Some of the overarching actions are explained in more detail below followed by the Action Plan in Section 5.

Kirklees Local Plan (adopted February 2019)

- 4.2 The Local Plan allocates a significant amount of land to be used for housing. The spatial strategy places the focus for development on Huddersfield and Dewsbury but also identifies new housing capacity in settlements across the district⁷. The Plan includes a variety of sites of different sizes and as well as a windfall allowance which is predominantly expected to comprise sites below the Local Plan allocations threshold (0.4ha). This range of sites will encourage delivery from a range of developers to contribute towards meeting housing needs. The council are also exploring opportunities for residential use within town centres for example through the Huddersfield⁸ and Dewsbury⁹ Blueprints.
- 4.3 The Local Plan phasing table informs the housing trajectory¹⁰ and demonstrates five years supply of deliverable housing sites to facilitate early housing delivery during the plan period. The Local Plan has allocated land for housing which was previously in the green belt and the removal of this policy constraint means that these sites are expected to significantly boost housing delivery in Kirklees in the coming years. The Local Plan also includes a series of actions to be considered to improve delivery if annual monitoring were to show a lack of sufficient housing supply.

Supplementary Planning Documents

- 4.4 The Council has adopted the following suite of Supplementary Planning Documents (SPDs) within the past few years¹¹:
- Housebuilders Design Guide Supplementary Planning Document (June 2021)
 - House Extensions & Alterations Supplementary Planning Document (June 2021)
 - Open Space Supplementary Planning Document (June 2021)
- 4.5 The suite of quality places documents aim to deliver a higher standard of design in residential development within Kirklees. The detailed guidance is to be used early in the design, layout and planning of all new residential developments, including proposals for new houses, apartments, student housing, home extensions and alterations. These documents should provide clarity on residential design and speed up decision making in accordance with the SPDs.
- 4.6 The Council is also currently preparing the Affordable Housing and Housing Mix SPD. This document will replace the existing Affordable Housing SPD (2008) and the Interim

⁷ Local Plan Strategy and Policies, p.32 (www.kirklees.gov.uk/localplan)

⁸ <https://www.kirklees.gov.uk/beta/huddersfield-blueprint/index.aspx>

⁹ <https://www.kirklees.gov.uk/beta/dewsbury-blueprint/index.aspx>

¹⁰ Local Plan Strategy and Policies, p.63 (www.kirklees.gov.uk/localplan)

¹¹ [Adopted Supplementary Planning Documents \(SPDs\) | Kirklees Council](#)

Affordable Housing Policy (January 2020) providing guidance on existing Local Plan policies and providing greater clarity on affordable and market housing mix requirements. This will speed up the decision-making process helping to deliver appropriate and policy compliant residential developments.

- 4.7 The Council produces supplementary planning documents and other guidance documents to provide further information and advice to the public, applicants and developers on the implementation of specific planning policies.

Guidance and advice notes

- 4.8 The council has also approved two further documents to provide clarity to developers relating to Biodiversity Net Gain and Climate Change, both have been published on the council’s website¹².

- Biodiversity Net Gain Technical Advice Note (June 2021)
- Climate Change Guidance for Planning Applications (June 2021)

- 4.9 The council is also updating the planning application validation requirements this year. This will help to facilitate the effective determination of planning applications by ensuring all relevant information is received early in the process.

Kirklees Housing Growth Programme

- 4.10 Kirklees Council has an ambitious housing growth programme and a dedicated housing growth team to deliver this. Delivery of the programme includes working with partners including Homes England, West Yorkshire Combined Authority, registered providers of affordable housing and commercial house builders to secure investment and ensure the timely development of sites of different sizes and tenure.

- 4.11 The Council has a Housing Delivery Plan, an update of which was reported to Kirklees Cabinet 20th Jan 2020¹³. This included information about the delivery of strategic housing sites in the Kirklees Local Plan, along with 41 Council owned sites which the Council is pro-actively working to develop. The Council has made significant progress in implementing the Housing Delivery Plan with specific examples shown in the following table:

Figure 4 – Specific Strategic Housing Sites Progress

Local Plan Site Ref	Description
HS102 / HS13 / HS156 / HS65 / HS78	Being developed as part of the Registered Provider Cluster Programme by 13 Group/InCommunities for low carbon affordable homes
HS14 / HS72	Construction started on both sites being delivered by Keepmoat Homes. HS72 being supported with funding from Homes England Accelerated Construction

¹² [Guidance and advice notes | Kirklees Council](#)

¹³ Kirklees Housing Delivery Plan Update (<https://democracy.kirklees.gov.uk/ieListDocuments.aspx?CId=139&MIId=6297>)

	Programme to ensure pace of development and including modern methods of construction
HS44	Brownfield site being developed by Unity Housing for 100% affordable homes
HS101	Extra Care facility to be delivered by Housing 21.

Housing Brokerage

- 4.12 Linked to the housing growth programme the council has a housing brokerage team that offers assistance to site developers and owners in overcoming barriers to site delivery. The focus is on sites which have been granted planning permission for housing, but which have yet to deliver new homes, and where Reserved Matters approval or discharge of conditions remain to be submitted and approved.

For more information on the service, contact Housing.regeneration@kirklees.gov.uk

Masterplanning and planning applications

- 4.13 The council is continuing to play a key role facilitating the masterplanning of Local Plan strategic sites including:
- Dewsbury Riverside, south Dewsbury (HS61, partly council owned): 1,869 homes during the plan period to 2031 plus 2,311 homes beyond the plan period
 - Bradley, Huddersfield (HS11, majority council owned): 1,460 homes during the plan period to 2031 plus 498 homes beyond the plan period
 - Chidswell, north-east Dewsbury (MXS7, privately owned): 1,815 homes during the plan period.

- 4.14 The council also operate a pre-application service¹⁴ which seeks to highlight and overcome constraints from the inception of housing schemes prior to the submission of a planning application.

Infrastructure provision

- 4.15 The council have a Major Projects Service with roles including co-ordinating infrastructure delivery and seeking timely delivery of infrastructure to facilitate housing delivery where required.
- 4.16 The Council publish an Annual Infrastructure Statement (IFS) which can be viewed on the council's website¹⁵. These reports provide a summary of financial contributions the Council has secured through section 106 agreements from new developments for off-site infrastructure works including highways, public open space, affordable housing, education, and drainage.

¹⁴ <https://www.kirklees.gov.uk/beta/planning-applications/get-pre-application-planning-advice.aspx>

¹⁵ [Infrastructure Funding Statements \(IFS\) | Kirklees Council](#)

5. Action Plan

- 5.1 The Action Plan below summarises the key barriers affecting housing delivery in Kirklees and includes proposed actions to overcome the issues. As the council is committed to achieving higher housing delivery in Kirklees, a number of the key activities listed below have already been initiated and have occurred since the Housing Delivery Test results were calculated.
- 5.2 The Action Plan will be reviewed annually although some specific actions will be reviewed more frequently as set out in the table below. It is important to note that many actions contribute to more than one of the key challenges.
- 5.3 The Action Plan focuses on key actions for the council; however, landowners/developers and other parties have a significant role to play in improving housing delivery across Kirklees. The anticipated increase in planning permissions and housing completions as a result of the adoption of the Local Plan are expected to lead to higher delivery rates in the coming years.

Key challenges	Actions	Outcome	By whom (lead)	Timescales
1. Sufficient supply of sites				
Lack of a range of site sizes	Adopt Local Plan including land to deliver 31,140 homes (range of site sizes and windfall allowance)	Adoption of the Local Plan	Councillors, Planning Policy	Completed – Local Plan adopted 27 th February 2019
Demonstrating at least five years supply of deliverable housing capacity	Actively contact landowners to collect information to support the five-year supply evidence base and identify areas for further action (see key challenge 2)	Demonstration of a five-year housing land supply to ensure sufficient deliverable sites.	Planning Policy	Ongoing but Local Plan evidence shows 5.17 years supply. ¹⁶

¹⁶[Authority Monitoring Report 2020/21 \(kirklees.gov.uk\)](https://www.kirklees.gov.uk/authority-monitoring-report-2020-21)

Key challenges	Actions	Outcome	By whom (lead)	Timescales
Exploring residential opportunities	Exploring opportunities for residential uses within town centres through Huddersfield and Dewsbury Blueprints and the progression of the Huddersfield Town Centre Living Plan.	Progress towards residential opportunities in both town centres through identification of schemes	Economic Resilience, Housing Growth, Planning Policy, Development Management	Ongoing but annual formal review
2. Tackling site specific delivery issues to ensure contribution to housing trajectory				
Exploring and resolving issues on stalled sites	Proactively contacting landowners for updates in relation to their sites, exploring delivery issues, building better relationships, and offering assistance through the Brokerage service.	Effective annually updated record of site progress. Good working relationship with landowners	Housing Growth, Planning Policy	Ongoing process but annual review
Submission of funding bids	Working with Homes England to identify funding sources to unlock housing delivery. Working with West Yorkshire Combined Authority to secure devolved funding to deliver housing.	Funding discussions on-going / secured.	Housing Growth team	On-going
	West Yorkshire Combined Authority Brownfield Housing Fund bids for Council owned sites and assisting applicants from privately owned sites.	Bids submitted 2021/22	Housing Growth, Private Developers	2021/22
Council owned sites delivery	Continue discussions relating to the disposal and development of council-owned land required to meet housing needs, including direct housing development by the Homes and Neighbourhoods Service, as Registered Provider. This will focus on delivering affordable housing through various	Twice yearly audit of completions information to consider progress with council owned site delivery	Planning Policy	Twice yearly housing delivery monitoring

Key challenges	Actions	Outcome	By whom (lead)	Timescales
	approaches including building dwellings acquiring former Right to Buy homes.			
Strategic site delivery	Continued work with developers in line with the Local Plan masterplanning policy (reference LP5) through project meetings to ensure effective masterplans to facilitate site delivery. Homes and Neighbourhoods can also assist in strategic site delivery in collaborating with developers or funders, such as potentially participating in the development of the site or through stock acquisition.	Timely delivery of strategic sites and other larger sites	Development Management, Planning Policy, Housing Growth	Twice yearly review
3. Development Management process				
Pre-application advice	Continued resourcing of Development Management to ensure an effective pre-application process	Increased pre-application advice requests and responses provided to agreed timescales	Development Management	Annual review
Planning application decisions	Timely Development Management decisions	Meeting agreed performance indicators for determination of planning applications	Development Management	Annual review
Provide guidance on how development plan policies will be applied.	Prepare and publish Supplementary Planning Documents: <ul style="list-style-type: none"> Affordable Housing and Housing Mix SPD 	Prepare, consult, and adopt the Supplementary Planning Document	Planning Policy	12 months

Key challenges	Actions	Outcome	By whom (lead)	Timescales
4. Viability and infrastructure				
Ensuring timely infrastructure delivery	Timely infrastructure delivery and securing further funding to accelerate delivery as necessary facilitated by Major Projects Service	Timely infrastructure delivery to ensure Local Plan objectives can be achieved in the medium to long term as well as informing the annual Infrastructure Funding Statement	Major projects	Annual review through Infrastructure Funding Statement ¹⁷

¹⁷ <https://www.kirklees.gov.uk/beta/planning-policy/infrastructure-funding-statements.aspx>

6. Monitoring arrangements

- 6.1 The Council is required to produce an Authority Monitoring Report (AMR), which must be published at least annually and show progress with Local Plan preparation, report any activity relating to Duty to Cooperate and show how the implementation of policies in the Local Plan is progressing. This includes monitoring of the housing policies and can be viewed on the council's website¹⁸.
- 6.2 The council will continue to monitor performance against the actions set out in this Action Plan and will undertake a further review of the information upon the publication of the 2022 Housing Delivery Test results (anticipated in November 2022) which will determine whether a further formal Action Plan is required. The council will also publish an annual Authority Monitoring Statement to report on Local Plan monitoring indicators.

¹⁸ <https://www.kirklees.gov.uk/beta/planning-policy/annual-monitoring-reports.aspx>