



City of
BRADFORD
METROPOLITAN DISTRICT COUNCIL

**Interim Statement on
Five-Year Housing Land Supply**

1st April 2025 to 31st March 2030

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1. Introduction

- 1.1. This interim statement provides information on the supply of deliverable land in the district from the base date of the Local Plan (1st April 2025) and contains information on completions for the 2025/26 monitoring year. It shows that for the assessment period Bradford Council cannot demonstrate a five-year housing land supply of deliverable housing sites. The statement concludes that the 5-year land supply requirement is 11,200 homes and the supply of deliverable sites as 8,033 homes which amounts to a 3.59 year (72%) supply. This represents a significant increase on the previous position for the period 2022-2027 where the supply was 2.08 years.

2. Background

- 2.1 The NPPF (2026) continues to focus the Government's objective of significantly boosting the supply of homes. Both plan making and monitoring have a role in ensuring this happens, by determining the minimum number of homes needed and understanding changes to the land supply.
- 2.2 The Council's strategic policies, including those relating to housing need and growth are currently contained in the Local Plan Core Strategy adopted in July 2017. This provided an overall housing requirement of 42,100 homes over the plan period (2013-2028) based on the districts objectively assessed need of 2,476 homes per annum and was historically the starting point for previous 5-year housing land statements.
- 2.3 Since the Core Strategy was adopted, there have been several changes to National Planning Policy. One of these changes was the introduction of a Standard Method (SM) for calculating housing need which has been subject to various iterations and has resulted in a range of different expected annual housing targets for Bradford.
- 2.4 In February 2021 the emerging Local Plan, covering an 18-year plan period (2020-2038), was published for consultation. Housing need using the standard method gave a revised housing requirement for the period and this was consulted upon alongside a number of proposed site allocations across the district. The further changes to the NPPF first introduced in December 2024 revised how annual housing need should be calculated with the NPPG confirming what can be included as counting toward the required delivery requirement including from historic delivery.

3. Calculating the five-year requirement

- 3.1 The Government is clear that the starting point for undertaking 5-year housing land supply calculations should be the standard method when a local planning authority does not have an up-to-date plan. Annex D paragraph 8 of the Framework (2026) states that; *“Local Planning Authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years’ worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old”*.
- 3.2 The standard method calculates a proportion (0.8%) of current housing stock and applies an adjustment factor to reflect local affordability pressures, to identify the minimum number of homes expected to be planned for each year. The provisional result for Bradford of 1,832 per annum was released as part of NPPF (2024), this was adjusted in May 2025 which gave a marginally higher figure of 1,845 homes per annum and is the figure used in year 1 of this statement (2025/26). The latest outcome for Bradford published in May 2026 increased this figure to 1,872 which in line with the Local Plan has been applied to years 2 to 5.
- 3.3 The under delivery of new homes nationally, remains a concern for the Government and to monitor and address this, they introduced the Housing Delivery Test (HDT). It measures in percentage terms; the net additional dwellings delivered over the past three years against the number of homes required.
- 3.4 Under Paragraph 9 of the Framework (2026) the supply of specific deliverable sites should include a buffer (moved forward from later in the plan period) of:
- 5% to ensure choice and competition in the market for land; or
 - 20% where there has been significant under delivery (measured against the Housing Delivery Test, where this indicates that delivery was below 85% of the housing requirement) of housing over the previous three years, to improve the prospect of achieving the planned supply.
- 3.5 The HDT results for the period 2020/21 to 2022/23 indicated that delivery across the Bradford District was 62% of the requirement. An updated version (Housing Delivery Test: 2025 measurement) published in August 2026 and covers the later three-year period of 2022/23 to 2024/25 and showed a lower HDT result of 56%. On this basis therefore, the appropriate buffer of 20% has been applied for the purpose of calculating the 5-year requirement.
- 3.6 NPPF (2026) para 12c. details that where delivery falls below 75% of the requirement over the previous three years, an evidenced unmet need for housing is deemed to exist for the purpose of applying policy S5(1)(j) in the

Framework (2026). This is in addition to the requirements for an action plan and 20% buffer.

3.7 Table 1 shows the Councils five-year requirement calculation.

Table 1: Five-Year housing requirement calculation

Base Target (2025) 1 year @ 1,845pa	1,845
Base Target (2026-2030) 4 years @ 1,872	7,488
5-year requirement	9,333
Application of 20% Buffer	1,867
Total 5 Year Requirement	11,200

3.8 In previous calculations, backlog for under delivery against the last adopted plan requirement (the Core Strategy) was added. The new Standard Method approach means backlog is already incorporated into the calculation, which together with the requirement through the housing delivery test of a further 20% buffer, means it is not necessary to add any further allowance over and above this.

4. Windfall Allowance

4.1 The NPPF (2026) states that Local Planning Authorities can make provision for the inclusion of “windfall” sites in their calculations providing there is “*compelling evidence*” that they will continue to provide a reliable source of the supply. In previous calculations, no windfall number was applied to the 5-year supply, however detailed analysis has indicated that since the start of the Core strategy plan period (2013), windfall development has made a significant contribution to delivery. The average contribution from windfall between 2013 and 2025 has been over 800 per year, reducing to just over 630 per year across the last 5 years. There are a number of reasons why this was so high:

- The identification of site allocations in the Replacement Unitary Development Plan (RUDP) as those above 0.40ha.
- Lack of an up-to-date plan.
- Previous 5-year supply calculations showing only around a 2-year supply resulting in planning applications being approved on unallocated sites.

- 4.2 The site size threshold for housing allocations in the new Local Plan is now 0.20ha. This lower threshold means that more sites above this threshold have now been allocated for development. These sites have been sourced from a wider range of land supply including via call for sites, Council surplus land lists and work on urban capacity analysis meaning the future potential level of windfall will likely be lower than experienced in recent years for sites between 0.2 and 0.4 ha¹.
- 4.3 In contrast the level of development from small sites (those below 0.20ha) is expected to remain strong. Past delivery on small 'infill sites' between 2013 and 2025 averaged 180 homes per year (excluding additional homes on large gardens) and urban capacity analysis indicates that there are still sufficient small sites to continue this trend. Indeed, permissions as at 31st March 2025 accounted for around 1,800 units with many having the potential to be completed within the next 2 years.
- 4.3 In addition the Council consider that further homes could still emerge from small urban sites, change of uses of rural buildings, conversions of larger homes to create smaller ones and other changes of use in the urban area.
- 4.4 On adoption of the Local Plan, whilst the contribution from larger windfall sites (above allocation threshold) is expected to reduce, the potential supply from small sites is likely to still be a feature of supply throughout the plan period. In consideration of the evidence therefore the Council consider it reasonable to add a modest windfall allowance of 250 homes per year to the supply calculation from year 4 onwards. This has been adjusted to 220 per year net to acknowledge a proportion of this will account for losses from demolition and conversions/change of use. The windfall allowance will be continually monitored and revised as required.

5. Assessing the Deliverable Supply

- 5.1 In assessing the sites which can be included in the 5-year supply, the NPPF requires Local Planning Authorities to consider whether the future of their housing land supply contains enough deliverable sites for at least 5 years assessed against the housing requirement.
- 5.2 National Planning Policy defines deliverable sites as 'should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years'. In particular this can include:
- a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be

¹ Further information is provided in the Housing Technical Paper published alongside the Regulation 19 Local Plan.

considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).

b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.

- 5.3 This has been clarified further by a case considered by the High Court (East Northamptonshire Council V Secretary of State for Housing, Communities and Local Government (2020) (CO/917/2020)). It was confirmed the definition above should not be taken to be a “closed list” and that a deliverable site can also include *“any site which can be shown to be ‘available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years’ will meet the definition”*. He went on to say that; *“The proper interpretation of the definition is that any site which can be shown to be ‘available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years’ will meet the definition; and that the examples given in categories (a) and (b) are not exhaustive of all the categories of site which are capable of meeting that definition. Whether a site does or does not meet the definition is a matter of planning judgment on the evidence available”*.
- 5.4 **Table 2** below sets out a summary of the available supply as at 1st April 2025 in relation to sites under construction and with extant planning permissions with the definition of deliverable supply.

Table 2: Under Construction and Planning Permissions

Sources of Supply	Delivery 1 st April 2025-31 st March 2030
Sites under construction	4125
Sites with extant planning permission	1670
	5795

- 5.5 The Local Plan has identified a supply of land as site allocations in addition to the permissioned supply as at 1st April 2025. Since the base date, a number of

these have gained planning permission or have planning applications pending and have been moved forward into the first 5 years of the plan period. As in previous statements, the Council has continued to take a cautious approach on expected start dates and build rates dependent on decision dates, progress on pending planning applications and developers' intentions in securing permissions.

- 5.4 In addition to homes defined as C3, national guidance also indicates that local planning authorities can also count housing to be provided for older people, including residential institutions in use class C2, as part of their housing land supply. This is on the basis that they effectively serve to release housing stock back to the market. The multiplier used by the Government of 2.5 bedrooms as equivalent to 1 unit and this additional supply has been included in the totals for unstated planning permissions.
- 5.5 Table 3 below summarises the potential supply of new homes from suitable sites expected to be delivered within the first 5 years of the supply. Delivery rates are based on the expectation of a maximum of 30 homes per year for sites of less than 150 homes and 40 units per year from larger sites, unless there are indications of other delivery patterns. These build out rates have been used in previous calculations and are reflective of typical development patterns on schemes in recent years. Most sites in general are expected to be delivered entirely within the 5-year period, with some of the larger sites extending beyond.
- 5.6 , A discount of 10% for non-delivery of permitted by not under construction sites have also been applied, this has been evidenced through a comparison on the number of homes developed against those where permissions which had lapsed before delivery could start over the previous 5 years.

Table 3- Assessed Five-Year Deliverable supply

	YEARS 1-5	YEARS 6-10	YEARS 11+	Total
Under Construction sites over 0.20ha	3,373	918	277	4,456
Small sites under construction	752	0	0	752
Detailed Planning Permission before 31st March 2025	601	142	0	743
Small sites with planning permission	1,069	0	0	1,069
Allocated sites expected to start within 5 years	1,905	6,226	10,759	18,890
Major Developed site in the green belt (permission in principle)	60	90	0	150

SUB TOTAL	7,760	1,153	277	
Less 10 % for non-delivery on sites not started	(-167)			
Windfall Allowance years 4 & 5 (net)	+440			
TOTAL per period	8,033			

6. The 5-Year Supply Calculation

- 6.1 The table below compares the assessed requirement against the supply outlined for April 1st 2025 to March 31st 2030. As noted in paragraph 1.2 this includes the net completion contribution as monitored for year 1 (2025/26) which includes additional units created from permitted development and communal accommodation delivered.

Table 3: 5 Year supply calculation

Total Requirement		11,070
Total 5-year Supply		8,033
1 year of requirement	11,200/ 5	2,240
Total 5 Year supply / 1 year requirement	8,033/ 2,240	3.59 years
Total 5 Year supply / Total Requirement	8,033 / 11,200	72% (rounded)

7. Conclusion

7. 1 The scale of the 5-year requirement has been determined using the Government's standard method for assessing housing need as it is now more than 5 years since the Core Strategy was adopted. On best information, the 5-year deliverable supply stands at 3.59 years. This figure is an improvement since the last statement for the period 2022-2027 but is still insufficient to meet current housing need.
- 7.2 On publication of the Local Plan. The Council fully expect site allocations to come forward via planning applications with some sites potentially able to deliver homes ahead of year 6, but for present forecasting purposes this has been treated cautiously. It should also be noted that the Council is committed to regeneration and already promotes suitable sites for residential development in its brownfield register.

