



Housing Delivery Test (HDT) Action Plan 2022

December 2022

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1. Introduction

- 1.1 The Department for Levelling Up, Housing and Communities (DLUHC), formerly MHCLG published the Housing Delivery Test (HDT): 2021 measurement on the 14 January 2022 on the GOV.UK website¹.
- 1.2 This Housing Delivery Test (HDT) Action Plan 2022 provides background on the HDT, the HDT 2021 result for Trafford, context for housing delivery in Trafford and a series of actions to improve housing delivery in the borough.
- 1.3 This is the fourth HDT Action Plan for Trafford and has been produced in response to the HDT 2021 measurement. This HDT Action Plan 2022 will be in place from 14 July 2022 and will cover the 12-month period up to 13 July 2023.
- 1.4 In line with government guidance, the Council undertook stakeholder engagement during the preparation of its initial HDT Action Plan² to understand some of the barriers to housing delivery.

What is the HDT?

- 1.5 The HDT was introduced as a requirement in the revised National Planning Policy Framework (NPPF) July 2018³. The HDT is an annual measurement of housing delivery, which applies to Trafford as a metropolitan borough with plan-making duties. HDT results are published annually by DLUHC.
- 1.6 The HDT is a percentage measurement of the number of net homes delivered against the number of homes required, averaged over a rolling three-year period, i.e., showing whether the required number of homes is being built in any one given local planning authority area, and if not, the extent of the shortfall.
- 1.7 A prescribed method for calculating the HDT has been set out by DLUHC, which includes adjustments for net student and other communal accommodation e.g., older persons' accommodation. As Trafford Council's Core Strategy is more than five years' old, the Local Housing Need (LHN) target must be used, as calculated by the Government's standard methodology⁴. Section 3 of this HDT Action Plan 2022 provides more information on Trafford's Development Plan progress.

Consequences of not meeting the HDT

- 1.8 The revised NPPF defines a number of consequences for Local Planning Authorities (LPAs) which will apply dependent on the level of the shortfall in housing delivery. The

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

² Stakeholder involvement has continued where possible and practicable, particularly with other Council departments, however due to the impacts of Covid and limitations of homeworking since March 2020, this has affected.

³ <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

⁴ <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>

consequences of not meeting the HDT apply from the day following the annual publication of the results and remain in force until the next results are published.

- 1.9 In broad terms, the requirements placed on LPAs as a result of the HDT are:
- **Housing delivering exceeds 95% of the LPAs identified housing requirement:** No action required.
 - **Housing delivery falls below 95% of the LPAs identified housing requirement:** Publish an action plan within six months from the date that the HDT is published, in collaboration with key stakeholders. It should identify the reasons for under-delivery, explore ways to reduce the risk of further under-delivery and set out the measures the LPA intends to take to improve the levels of delivery. The need to produce an action plan will continue to apply until subsequent HDT results show that delivery exceeds 95% of the LPAs identified housing requirement.
 - **Housing delivery falls below 85% of the LPAs identified housing requirement:** Add a 20% buffer onto a LPAs five-year land supply with immediate effect. The 20% buffer is required to ensure a realistic prospect of achieving the planned housing requirement by adding flexibility to the supply. The 20% buffer will continue to apply until subsequent HDT results show that delivery exceeds 85% of the LPAs identified housing requirement.
 - **Housing delivery falls below 75% of the LPAs identified housing requirement:** Determine planning applications with a presumption in favour of sustainable development with immediate effect.

2. Housing Delivery Test: 2021 Measurement for Trafford

- 2.1 The HDT: 2021 measurement considers the three-year period 2018-19, 2019-20 and 2020-21. The measurement shows that Trafford met 79% of its housing requirement for that period of time (see Appendix A). The full spreadsheet showing the results for England are published on the GOV.UK website⁵.

Consequences for Trafford of the HDT: 2021 measurement

- 2.2 As a result of Trafford meeting 79% of its housing requirement in relation to the HDT: 2021, the Council is required to:
- Publish an HDT Action Plan by July 2022 (this document); and
 - Add an additional 20% buffer to the five-year land supply
- 2.3 The application of the presumption in favour of sustainable development for planning applications including residential development, has been removed as a consequence of the latest HDT result, compared with the 2020 result.
- 2.4 However, the presumption in favour of sustainable development also applies where the Council cannot demonstrate a five-year supply of housing land. As such planning applications for residential development will continue to be determined under the

⁵ <https://www.gov.uk/government/publications/housing-delivery-test-2021-measurement>

presumption until such a time as the Council can demonstrate a five-year housing land supply.

- 2.5 Moreover, Trafford's housing delivery has been below its housing requirement for a number of years and therefore in line with paragraph 74 of the NPPF (2021), a buffer of 20% is already applied to Trafford's identified land supply.
- 2.6 The addition of a 20% buffer means that Trafford is in effect required to find sufficient land over the next five years (2022 – 2027) to deliver 8,442 rather than 7,035 homes based on Trafford's current housing requirement of 1,407 new homes per year⁶

3. Housing Delivery in Trafford

Trafford Overview

- 3.1 Trafford is situated in the northwest of England, and is one of the main economic drivers within the Manchester City Region, contributing to and supporting the objective of Greater Manchester becoming a world class destination to visit, live and work in.
- 3.2 Trafford is one of ten local authorities in Greater Manchester (GM) and part of the Greater Manchester Combined Authority (GMCA). This is made up of the GM local authorities (led by the GM Mayor), who work with local services, businesses, communities, and other partners to improve the city region.
- 3.3 Located in the south west of Greater Manchester, Trafford has a population of around 235,100 people based on the Census 2021 (8.2% of the Greater Manchester population) with a diverse mix of communities.
- 3.4 Trafford is a borough of contrasts; it has important centres for industry and business with major and long-established industrial estates; a high-quality natural environment including leafy suburbs and large areas of countryside together with some economically disadvantaged communities.

Trafford's Development Plan

- 3.5 The adopted Development Plan for Trafford currently comprises the:
- Trafford Core Strategy (adopted January 2012)⁷;
 - Saved policies of the Revised Trafford Unitary Development Plan (UDP) (adopted June 2006⁸);
 - Greater Manchester Joint Waste Plan (adopted April 2012)⁹;
 - Greater Manchester Joint Minerals Plan (adopted April 2013)¹⁰; and

⁶ Trafford's Local Housing Need (LHN) as at 1st April 2022 is 1,407 net new homes per annum.

⁷ <https://www.trafford.gov.uk/planning/strategic-planning/local-plan/core-strategy.aspx>

⁸ <http://www.trafford.gov.uk/planning/strategic-planning/unitary-development-plan.aspx>

⁹ <https://www.trafford.gov.uk/planning/strategic-planning/local-plan/greater-manchester-joint-waste-development-plan-document.aspx>

¹⁰ <https://www.trafford.gov.uk/planning/strategic-planning/local-plan/greater-manchester-joint-minerals-development-plan-document.aspx>

- Altrincham Town Centre Neighbourhood Business Plan (adopted November 2017)¹¹.
- 3.6 The Core Strategy covers the period 2008 to 2026 and contains an annualised housing target of 694 units per annum up to 2018 and 578 per annum between 2019 and 2026. However, as this plan is deemed “out of date” in terms of its housing targets by the NPPF, these have been replaced by the Local Housing Need (LHN) requirement of 1,407 units per annum (net) as of 1 April 2022.
- 3.7 Trafford recognises the challenges posed by the need to increase supply and accelerate the delivery of new homes and is one of nine local authorities within Greater Manchester committed to producing a joint spatial plan for the combined area.
- 3.8 Consequently, the LHN requirement will remain in place until the joint Local Plan for nine of the GM Local Planning Authorities “Places for Everyone” (PfE) is adopted, which will set a new housing requirement and housing delivery trajectory for Trafford. The PfE Plan was submitted to the Secretary of State on 14 February 2022, with Examination hearings due to commence in Autumn 2022.
- 3.9 Trafford is also preparing a new Local Plan¹², which once adopted will form part of the Development Plan for the borough alongside PfE.
- 3.10 Furthermore, the Development Plan will also comprise, once adopted, the Civic Quarter Area Action Plan (CQAAP), which seeks (among other things) to deliver up to 4,000 new homes on existing identified sites, with 2,500 (as a minimum) delivered in the plan period and the remainder after 2037. The plan underwent Examination in early April 2022, with the inspector’s report anticipated in Autumn 2022.
- 3.11 Once adopted, PfE, the Trafford Local Plan and Civic Quarter Area Action Plan will (together) replace both Trafford’s Core Strategy and saved policies of the UDP, forming the adopted Development Plan for the borough, and setting out the housing requirement for Trafford.

Housing Delivery

- 3.12 Whilst the full impact of the Covid 19 pandemic on the delivery of housing in Trafford is still to be fully understood, in the short-term housing completions have continued to improve. As shown in Table 1 completions in Trafford in 2020/2021 were in fact at the highest since the adoption of the Core Strategy.
- 3.13 Trafford’s HDT: 2021 measurement considers the period 2018-19, 2019-20 and 2020-21.

¹¹ <https://www.trafford.gov.uk/planning/strategic-planning/local-plan/altrincham-neighbourhood-business-plan.aspx>

¹² <http://www.trafford.gov.uk/planning/strategic-planning/local-plan/trafford-local-plan.aspx>

Table 1 Trafford's Housing completions 2013/14 - 2021/22

Year	Housing requirement (Net) ¹³	Housing completions (Net)
2013/14	694	145
2014/15	694	215
2015/16	694	361
2016/17	694	250
2017/18	694	468
2018/19	1,335	953
2019/20	1,362	689
2020/21	1,369	1,081
2021/22	1,377	501

- 3.14 In the three-year period prior to this monitoring period, i.e., 2015/2016 to 2017/2018 (when the Core Strategy requirement applied) there were 1,079 homes built compared to 2,723 built between 2018/2019 to 2020/2021 which is a 150% increase.
- 3.15 This shows that principally, Trafford's under delivery is primarily because of the housing requirement increasing at a greater rate than delivery. However, the recent uplift in delivery is directly linked to the Council's deliberate actions to increase the numbers of residential permissions granted, which between 1 April 2018 and 31 March 2021 totalled 8,960, equating to annual residential approvals of between c. 3,200 and 3,300 units. This figure is increasing significantly, with the average over the same period between 2017 and 2020 being between c. 1,800 and 2,100 units.
- 3.16 With the current, upward adjusted LHN per annum of 1,407, the Council has consistently been granting almost twice as many planning permissions to meet the LHN.
- 3.17 The increase in delivery over recent years has been predominantly focused on small to medium size sites, which has in part been aided by the identification (and removal) of barriers to development through the 'housing tracker' operated by the Strategic Growth Service, including the monitoring of stalled development sites with planning permission.
- 3.18 Additionally, and of significant note in increasing the housing delivery rate, the Council is itself leading the way, demonstrating to the market that planning policy compliant, exemplar schemes are capable of being viably delivered. Through its property and development portfolio the Council is delivering its own schemes through Joint Ventures (JVs) or with development partners. The Planning Service is involved from the outset with the schemes, advising on planning policy requirements and assisting with the design process to ensure that the schemes brought forward reflect the Council's aspirations.
- 3.19 Together, these measures are leading to an improving delivery rate in the borough, with the three-year average increasing from 768 dwellings per annum (2017-2020) to 1,033 dwellings per annum (2018-2021). The HDT measurement for Trafford has increased accordingly, from 58% in 2019, to 61% in 2020 and most recently 79% in 2021.

¹³ 2013/14 – 2017/18 based on Trafford's Core Strategy housing target

- 3.20 This has culminated in the Inspector for the Former B&Q inquiry (Appeal Reference APP/Q4245/W/20/3258552) stating that:
 197. “... there has been an upward trajectory of new homes being delivered in Trafford in recent years with the Council no longer falling into the ‘presumption’ category compared to the 2020 HDT. This is due to the action that the Council has taken and continues to take to address the shortfall through its Action Plan. It appears to be doing everything it can in this regard. The Council is granting more permissions than the housing requirement and taking other proactive steps”.
- 3.21 Notwithstanding the above success, delivery at Trafford’s larger, strategic locations remains slow. The Strategic Locations listed below were identified in the Core Strategy (adopted January 2012) as the key areas for change over the Plan period (up to 2026), including significant residential development.
- SL1 – Pomona Island;
 - SL2 – Trafford Wharfside;
 - SL3 – Lancashire Country Cricket Club Quarter;
 - SL4 – Trafford Centre Rectangle; and
 - SL5 – Carrington.
- 3.22 The Core Strategy policy for each of the five Strategic Locations set out an indicative minimum figure for residential development to be delivered over the Plan period. Table 2 shows the original allowance for these locations in the Core Strategy as well as their anticipated capacities as at 31st March 2022.

Table 2 Strategic Locations development update – as at 31st March 2022

Strategic Location	Original Core Strategy residential allowance	Completions	Total no. homes to come forward up to 2037		
			Sites with planning permission	Sites without planning permission	Total (Total for area beyond 2037)
SL1 - Pomona Island	800	380	526	1,762	2,288 (3,402)
SL2 – Trafford Wharfside	900	354	0	1,600	1,600 (2,546)
SL3 – Lancashire County Cricket Club Quarter ¹⁴	400	242	259	3,311	3,570 (4,970)
SL4 - Trafford Centre Rectangle	1,050	0	1,600	0	1,600 (3,000)

¹⁴ For the purposes of this HDT Action Plan 2022, SL3 is considered to be superseded by the area now identified in the Civic Quarter Area Action Plan.

Strategic Location	Original Core Strategy residential allowance	Completions	Total no. homes to come forward up to 2037		
			Sites with planning permission	Sites without planning permission	Total (Total for area beyond 2037)
SL5 – Carrington ¹⁵	1,560	80	1,123	0	1,123
Total	4,710	1,056	3,508	6,673	10,181 (15,041)

- 3.23 As work on the new Trafford Local Plan progresses, together with masterplans and Area Action Plans being developed for these areas, figures relating to the residential allowance for these strategic locations have been adjusted to reflect increased anticipated growth.
- 3.24 Anticipated growth in these strategic locations is as a result of the following:
- A masterplan for Pomona Island (SL1) was approved by the Council in 2020 increasing the number of new homes that the area could deliver to around 2,800 on top of other permissioned developments in the area
 - At Trafford Wharfside (SL2) a comprehensive masterplan for the area is being developed which will assist in the delivery of appropriate new homes and jobs in the area.
 - An Area Action Plan has been produced for the area known as the Civic Quarter (which will replace and extend the boundary of SL3). Following the submission to PINS in November 2021, examination sessions were held in April 2022. Consultation on Main Modifications began on 14 July 2022 until 2 September 2022.
 - There has been an increase in the number of homes expected to come forward within the Trafford Centre Rectangle (SL4) area due to a planning approval for 3,000 in the area known as Trafford Waters which is now being delivered.
- 3.25 In Strategic Location SL5 ‘Carrington’, the amount of homes left to come forward is less than identified in the Core Strategy. This is a result of further work which has been undertaken as part of the Masterplanning and evidence base work for the PfE plan, as well as the various planning applications which have been approved in the area. This further work has provided a more detailed understanding of the constraints, particularly the Control of Major Accident Hazards (COMAH) zone restrictions which relate to existing industrial uses, resulting in a reduced amount of development which can be achieved in the SL5 policy area. This reduced capacity on brownfield sites in the urban area in Carrington has been taken into account in the New Carrington Masterplan and PfE 2021 Policy.
- 3.26 Strategic Location SL5 falls within the area covered by New Carrington in the PfE plan, however there is a distinction between homes set to come forward under SL5 (i.e., the baseline land supply) and those which require PfE to be adopted in order for them to come forward. The homes that are reliant on PfE being adopted have not been shown in Table 2.

¹⁵ For the purposes of this HDT Action Plan report SL5 does not include the wider area covered by the PfE New Carrington strategic allocation – please see section 3.19.

- 3.27 Both of the emerging PfE strategic allocations at New Carrington and Timperley Wedge are set to start delivering completions within the plan period however as these allocations are not yet part of the adopted development plan, they have not been included in the large sites development update in Table 2. Following the adoption of PfE the strategic allocations will be added.

Other sites in the housing land supply

- 3.28 In addition to the Strategic Locations outlined in Table 2, a number of other large sites exist within Trafford's housing land supply which for the purpose of this HDT Action Plan 2022 equates to sites with the capacity for 50 or more residential homes. These make a contribution of 4,854 units to the housing land supply of dwellings left to come forward, and are identified in Appendix B.
- 3.29 Given the importance of these larger sites in delivering Trafford's housing growth objectives and the role that they will play in the emerging PfE and Trafford Local Plan, it is important that delivery rates at these locations are increased. In order to achieve this, Trafford must continue its proactive approach to increasing housing delivery, focusing particularly on barriers to development and working in partnership with landowners and the development industry.
- 3.30 In this regard, it should be noted that a number of these sites are in the ownership of Trafford Council and as set out previously, through its property and development portfolio the Council is delivering its own schemes through JVs and/or with development partners.
- 3.31 Detail on how Trafford is proactively increasing the rate of delivery on these larger sites, as well as smaller sites coming forward for development, is set out in Section 4 of this report.

4. Trafford's Housing Delivery Test Actions

- 4.1 Section 3 provided an analysis of the local planning context; the housing land supply position; housing delivery over recent years and successful actions to date in increasing delivery. This section identifies specific actions which Trafford Council will undertake over the next 12 months to increase housing delivery further within Trafford.
- 4.2 The actions focus on a number of specific tasks which it is considered will increase the rate of housing delivery in Trafford.
- 4.3 It is important to note that a number of the actions identified are currently underway either in part or in full. For example, the proactive monitoring of sites and engagement with developers and landowners already takes place but its scope will be widened through this HDT Action Plan 2022.

- 4.4 Similarly, the Planning and Development Service already takes a proactive approach to dealing with planning applications and assists in facilitating the delivery of housing. This approach is invaluable, resulting in 81% of major residential planning applications granted permission between 2018 and 2021. As such, this proactive approach will continue.

- 4.5 Since the introduction of the HDT in 2018, this will be the fourth HDT Action Plan for Trafford. The table below sets out the actions and includes when they were introduced. It sets out who the action will be delivered by and when. As this is the fourth HDT Action Plan and refreshes the July 2021 version, it includes an update as at September 2022.

HDT Action Plan 2022 – Housing delivery actions

ACTION	BY WHO	BY WHEN	UPDATE – SEPTEMBER 2022
Develop a framework for large / strategic sites and work with developers and landowners to deliver new homes, including the production of masterplans (<i>August 2019</i>).	Strategic Growth Service/Planning and Development / Key landowners	Ongoing	
The Council will work with the landowners within the Pomona Island area to bring forward the development identified in the approved Masterplan for the area (<i>July 2022</i>).	Peel Land / Planning and Development	Ongoing	Masterplan approved in March 2020, completing the action: 'The Council will work with landowners to prepare a Masterplan for the Pomona Island area (August 2019). Peel Land are considering bringing forward further development parcels and an outline application for the site in 2022.
The Council will work with the landowners to prepare a development framework for the Trafford Wharfside area (<i>August 2019</i>).	Strategic Growth Service / MUFC / Peel Holdings / Salford City Council	Ongoing	Trafford Council has appointed Hawkins Brown (June 2022) to oversee the development of the Trafford Wharfside Masterplan. As part of developing a Masterplan for the area, the consultants have been tasked with undertaking significant consultation with local landowners and developers who have an interest in the area who will be strongly encouraged to participate in the masterplanning process. It is expected that the Trafford Wharfside Masterplan will be completed in the Autumn of 2022. There is interest in bringing forward a number of sites and pre-application discussions have taken place. Some planning applications are expected be received in late 2022/ early 2023.

ACTION	BY WHO	BY WHEN	UPDATE – SEPTEMBER 2022
<p>The Council will work with key landowners in the Carrington strategic location to reduce barriers to development, for example through securing funding opportunities (<i>August 2019</i>).</p>	<p>Strategic Growth Service / Key landowners</p>	<p>Ongoing</p>	<p>The wider development allocation is being secured through the Places for Everyone plan (formerly GMSF) process. A HIF bid has been secured relating to land rationalisation work. A strategy for the delivery of the Carrington Relief Road has been implemented with developer contributions being sought to meet the funding gap. Reserved matters have been approved for 277 units at Carrington Village with highway works to unlock this scheme now complete. The first phase of the 600 unit Heath Farm Lane is under construction and reserved matters for Phases 3 and 5 (131 units) is currently under consideration.</p>
<p>The Council will work with the landowners of Trafford Waters to reduce barriers to development, for example through securing funding opportunities (<i>August 2019</i>).</p>	<p>Planning and Development / Peel Land</p>	<p>Ongoing</p>	<p>A £4 million HIF bid has been secured for phase one of the development. This will deliver 350 units before 2025, with development partners being secured. Discharge of relevant pre-commencement conditions for the outline application (3,000 units) is almost complete (including a site wide Design Framework) and the first reserved matters application for supporting infrastructure has been submitted and is expected to be granted in July 2022. Pre-application discussions are underway on the detailed design of the first two plots.</p>

ACTION	BY WHO	BY WHEN	UPDATE – SEPTEMBER 2022
<p>The Council will work with the landowners to prepare Civic Quarter Area Action Plan (<i>August 2020</i>).</p>	<p>Strategic Growth Service/Planning and Development / Key landowners</p>	<p>End 2022</p>	<p>The Civic Quarter AAP was submitted to PINS in November 2021 with the Examination taking place in April 2022. A schedule of Main Modifications has been agreed with the Inspector and consultation will take place in July / August 2022. Subject to the Inspector’s Report, it is anticipated that adoption will take place in October 2022. The AAP identifies 1,494 units coming forward in the first five years of the plan period. An outline application for up to 750 homes was granted, subject to a S106 agreement, for the former Kellogg’s site. Reserved matters applications for 630 units are expected in 2022. A number of other sites in the Civic Quarter area have planning permission (e.g., Botanical House – 149 units) or are at pre-application stage. Further planning applications are expected in 2022 / 23.</p>
<p>The Council will consider the future for Stretford Town Centre and surrounding areas in terms of development and funding opportunities (<i>July 2022</i>)</p>	<p>Strategic Growth Service/Planning and Development / Key landowners</p>	<p>Ongoing</p>	<p>A sum of £17m has been awarded via the Future High Streets Fund. An outline planning application for the Stretford Mall and Lacy Street sites for up to 800 homes was granted, subject to a S106 agreement, in March 2022. Reserved matters are expected for two plots totalling around 300 homes in 2022.</p> <p>The Council will produce a Supplementary Planning Document for Stretford, covering the town centre and surrounding areas to guide development and transformation in the area. This will include the former site of Stretford Mall which is set to deliver 800 new homes.</p>

ACTION	BY WHO	BY WHEN	UPDATE – SEPTEMBER 2022
Produce a Borough-wide Trafford Design Code via the DLUHC Design Code Pathfinders Programme (<i>July 2022</i>).	Planning and Development	July 2023	A Design Code will give developers certainty on expectations and ‘must haves’ and therefore the quantum and quality of development that can be secured on a site, in order to improve housing delivery through certainty. The Council is one of 25 LPAs / neighbourhood groups selected to participate in the DLUHC Design Code Pathfinders Programme and has been awarded £160,000 of funding to deliver a Design Code. Consultation events took place across the Borough in July 2022 with targeted stakeholder events timetabled for September / October 2022. Adoption of the Trafford Design Code is expected in Summer 2023.
Support developers in future bids for Housing Infrastructure Funding (HIF) and use of other funding streams to unlock infrastructure critical to development (<i>August 2020</i>)	Strategic Growth Service/Planning and Development / Key landowners	Ongoing	HIF funding has already been secured for land rationalisation work at New Carrington and Phase One of Trafford Waters. A successful Future High Street Fund bid will deliver the comprehensive regeneration of Stretford Town Centre. The Council is also taking steps to help unlock the Carrington Relief Road through a combination of external funding, developer contributions and CIL monies, to enable the development to come forward more quickly.
Identify, utilise and deploy Council assets (land and buildings) to bring forward more sites for residential development (<i>August 2020</i>)	Strategic Growth Service/ Place Shaping Board/ Bruntwood Works	Ongoing	The Council has land holdings in Stretford, Old Trafford and Altrincham, which together could deliver around 1,500 homes. There are also a number of smaller sites in the pipeline.
Identify other brownfield land with redevelopment potential in public ownership, and work with key stakeholders to bring appropriate sites forward for development (<i>August 2020</i>)	Strategic Growth Service/Planning and Development / Public Sector landowners	Ongoing	A JV arrangement has been established with GMCA to bring forward the redevelopment of the former GMP site at Chester Road. A developer partner is being sought and a context and massing analysis has demonstrated 600 homes can be accommodated on the site (subject to planning).

ACTION	BY WHO	BY WHEN	UPDATE – SEPTEMBER 2022
Utilise and deploy the Council's CPO powers to acquire strategically significant sites / assets and bring them forward for development (<i>August 2020</i>)	Strategic Growth Service/Planning and Development/Legal Services / Key landowners	Ongoing	<p>There is currently agreement within the Council to bring forward CPO proceedings on a limited number of sites (with a particularly focus on driving forward the Council's ambitions for the Civic Quarter area in Old Trafford).</p> <p>The Council will seek to CPO sites in JV arrangements where delivery has stalled.</p>
Deliver the Council's own schemes (utilising its investment portfolio) through Joint Ventures or with development partners (<i>August 2020</i>)	Strategic Growth Service/Planning and Development / Development Partners	Ongoing	<p>Development is being progressed at a number of sites within the Borough. This includes the former Kellogg's site, Old Trafford, for up to 750 homes. The redevelopment of Stretford Mall has an outline planning application approved for the delivery of up to 700 homes with plot 1 disposal targeted for late 2022. A scheme at Sale Magistrates Court (83 units) has planning permission and construction is due to start in 2022. A scheme at Clarendon House in Altrincham (68 units) has been submitted and is currently under consideration. The Council has several other sites in feasibility stage across the Borough as part of its self-delivery housing programme (200 units).</p>
Work towards maintaining a five year land supply (<i>July 2021</i>).	Strategic Growth Service/ Planning and Development	Ongoing	<p>Annual updates to the Strategic Housing Land Supply (SHLAA) and use of the Housing Tracker, continue to identify sites for the delivery of residential schemes for future years. The housing land supply position has improved from 2.4 years (March 2020) to 3.75 years (March 2022).</p>
Through the housing tracker continue to identify and attempt to resolve barriers to early commencement after planning permission is granted (<i>August 2019</i>).	Strategic Growth Service	Ongoing	Ongoing action.

ACTION	BY WHO	BY WHEN	UPDATE – SEPTEMBER 2022
Proactively review the Strategic Housing Land Availability Assessment (SHLAA) to identify sites within years 6-10 and 11-15 years which could be brought forward for early delivery through the removal of current barriers to development (<i>August 2019</i>).	Strategic Growth Service/ Planning and Development	Ongoing	Latest SHLAA published in February 2021 alongside evidence base for Regulation 18 Local Plan. Future updates produced annually.
Impose planning conditions requiring short(er) timescales for submission of reserved matters or commencement of development (<i>August 2020</i>).	Planning and Development	Ongoing	Ongoing action.
Prepare Places for Everyone Plan (formerly GMSF) to establish the strategic policy context for housing land supply and delivery (<i>August 2019</i>).	GMCA/ Strategic Growth Service	Ongoing	Public consultation on the publication version took place between 9 August and 3 October 2021. The Plan was submitted to the Secretary of State for examination on 14 February 2022. Examination hearing sessions are due to commence Autumn 2022.
Prepare the Trafford Local Plan to establish the local policy context for housing land supply and delivery (<i>August 2019</i>).	Strategic Growth Service	Ongoing	A Reg 18 version of the Local Plan was published for public consultation (Regulation 18 Draft Local Plan) between 4 February 2021 and 18 March 2021. Progress on the Local Plan is dependent on the progress of the Places for Everyone Plan, therefore the timetable for the Local Plan is subject to potential review.
Explore opportunities to deliver more self and customer build properties (<i>August 2020</i>)	Strategic Growth Service	Ongoing	The Council maintains a Self and Custom Build Register (which is free to join on the Council's website). The Council's emerging Local Plan will also potentially include a policy requiring a percentage of major residential developments to be for serviced plots for sale to self-build and custom housebuilders. An officer with responsibility for self-build has been seconded to the Strategic Planning Team.

ACTION	BY WHO	BY WHEN	UPDATE – SEPTEMBER 2022
To drive forward the actions relating to increasing housing growth and delivery as contained within the Housing Strategy Action Plan 2018-23 ¹⁶ (<i>August 2019</i>)	Trafford Strategic Housing Partnership	Ongoing	The last Housing Strategy 2018-2023, Annual Statement was published August 2020. This shows development of actions of the Housing Strategy being published in 2018 ¹⁷ .

¹⁶ <https://democratic.trafford.gov.uk/documents/s29428/Housing%20APPENDIX%205%20-%20Trafford%20Housing%20Strategy%20Action%20Plan%202018-2023.pdf>

¹⁷ <https://www.trafford.gov.uk/about-your-council/strategies-plans-and-policies/housing-strategy/docs/Trafford-Housing-Strategy-2018-23-Annual-Statement-2020.pdf>

5. Monitoring the Action Plan

- 5.1 The HDT measurement is published annually by DLUHC. It is important that the measures put in place by this HDT Action Plan 2022 are effective in increasing housing delivery.
- 5.2 In order to ensure that the HDT Action Plan 2022 is effective, regular monitoring will take place of the outcomes of the actions and this will be used to inform future any HDT Action Plans.

Appendix A – Trafford’s extract from the HDT: 2021 measurement spreadsheet¹⁸

ONS code	Area Name	Number of homes required			Total number of homes required	Number of homes delivered			Total number of homes delivered	Housing Delivery Test: 2021 measurement	Housing Delivery Test: 2021 consequence
		2018-19	2019-20	2020-21		2018-19	2019-20	2020-21			
E08000009	Trafford	1,335	1,247	911	3,493	970	723	1,076	2,769	79%	Action Plan and Buffer

¹⁸ <https://www.gov.uk/government/publications/housing-delivery-test-2021-measurement>

Appendix B – Trafford’s land supply as at 31st March 2022 (50+ units in capacity)

Please note does not include sites within Core Strategy Strategic Locations. Please see Section 3 for further information on those sites.

The following table provides information on sites with a capacity of 50 units or more as at 31st March 2022. Site information will be updated in future iterations of the Housing Delivery Test Action Plan, if required. The latest information on Trafford Council’s land supply position can be found via the Trafford Council Strategic Planning web pages.

Site Ref	Site Name	Total Dwellings Proposed (Gross)	Completions	Dwellings left to come forward	Planning status
1455	TRAFFORD PRESS SITE, CHESTER ROAD, M16 9	116	0	116	Not permitted
1542-01	L & M SITE, NORMAN ROAD	147	106	41	Under construction
1561	FORMER SCHOOL AND RED BRICK PUBLIC HOUSE, OAK ROAD	75	0	75	Under construction
1582	REGENT ROAD CAR PARK, ALTRINCHAM	70	0	70	Under construction
1596	LAND BOUND BY BRIDGEWATER WAY, CHESTER ROAD, VIRGIL STREET AND PRINCESS STREET	363	89	274	Under construction
1607	LAND BOUND BY ELSINORE ROAD AND SKERTON ROAD, STRETFORD, M16 0WF	367	0	367	Permitted
1607-01	FORMER BAKEMARK UK, SKERTON RD, STRETFORD	180	0	180	Not permitted
1610-01	LAND AT LOCK LANE, PARTINGTON	298	0	298	Under construction
1610-02	LAND OFF HALL LANE, PARTINGTON	151	0	151	Under construction
1688	FORMER ROYAL CANAL WORKS, SOUTH OF EDGE LANE, M32	51	0	51	Permitted
1696-01	LAND AT OAKFIELD ROAD/MOSS LANE ALTRINCHAM, WA15 8EP	59	0	59	Under construction
1696-02	LAND AT OAKFIELD ROAD (ALTAIR)MOSS LANE, WA15 8EP	85	0	85	Permitted

Site Ref	Site Name	Total Dwellings Proposed (Gross)	Completions	Dwellings left to come forward	Planning status
1888	GLOBE TRADING ESTATE, 88-118 CHORLTON ROAD, M15 4AL	148	0	148	Not permitted
1934-02	LAND OFF BOLD STREET, OLD TRAFFORD, M15 5PW	143	0	143	Not permitted
1978	STRETFORD MALL, CHESTER ROAD	800	0	800	Not permitted
1983	THE SQUARE, TOWN SQUARE, SALE, M33 7WZ	202	0	202	Not permitted
1988	FORMER ITRON SITE, TALBOT ROAD, STRETFORD, M32 0XX	282	130	152	Under construction
2144	CLARENDON HOUSE, STAMFORD NEW ROAD, ALTRINCHAM, WA14 1BY	68	0	68	Not permitted
2234	PETROL STATION AND ADJ LAND AT 499 CHESTER ROAD, M16 9HF	200	0	200	Not permitted
2252	LYNNFIELD HOUSE/HAMILTON HOUSE, CHURCH STREET ALTRINCHAM, WA14 4DZ	80	0	80	Not permitted
2310-02	TRAFFORD PLAZA, 73 SEYMOUR GROVE, OLD TRAFFORD, M16 0LD	174	0	174	Under construction
2369	FORMER TRAFFORD MAGISTRATES' COURT, ASHTON LANE, SALE, M33 7NR	84	0	84	Permitted
2605	CROSSFORD COURT, DANE ROAD, SALE, M33 7BZ	96	9	87	Under construction
2671	PARAGON HOUSE, 48 SEYMOUR GROVE, OLD TRAFFORD, M16 0LN	96	0	96	Under construction
2725	SALE WEST ESTATE BOUNDED BY FIRS WAY, CHERRY LANE, WOODHOUSE LANE AND MANOR AVENUE	263	0	263	Under construction
2771	HARRY LORD HOUSE, 120 HUMPHREY ROAD, OLD TRAFFORD, M16 9DF	66	0	66	Under construction
2832	WARWICK ROAD SOUTH, OLD TRAFFORD	126	0	126	Not permitted
2833	FORMER B+Q SITE, GREAT STONE RD, OLD TRAFFORD	163	0	163	Not permitted
2837	CHRISTIE ROAD, STRETFORD	67	0	67	Not permitted

Site Ref	Site Name	Total Dwellings Proposed (Gross)	Completions	Dwellings left to come forward	Planning status
2838	PELICAN INN AND HOTEL, 350 MANCHESTER ROAD, ALTRINCHAM, WA14 5NH	64	0	64	Not permitted
2876	NEW STREET, ALTRINCHAM (ALBERT COURT, LLOYD COURT AND CHAPEL COURT)	104	0	104	Not permitted
	Total no. new homes on sites delivering 50 units or more in the identified land supply as at 31st March 2022	5,188	334	4,854	