



**BEDFORD**  
BOROUGH COUNCIL

# 5 YEAR SUPPLY OF DELIVERABLE HOUSING SITES

2018/19 -2022/23

March 2019



# 1. Introduction

- 1.1 This report considers the supply of housing land in Bedford Borough which is available and deliverable for future residential development over the next 5 years.

## **The five year period**

- 1.2 The five year supply period is measured from the start of the current financial year. Year one of the calculation is the year 2018/19 and year five is the year 2022/23.

## **Approach to the calculation of five year supply**

- 1.3 An update to the NPPF published in February 2019 has clarified the position in relation to the calculation of five year housing land supply. Paragraph 73 of the framework 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 <sup>37</sup>” The update has added to the wording of footnote 37 so that it now reads “Unless these strategic policies have been reviewed and found not to require updating. Where local housing need is used as the basis for assessing whether a five year supply of specific deliverable sites exists, it should be calculated using the standard method set out in national planning guidance”
- 1.4 Paragraph 73 of the NPPF also advises on the buffer to be applied to the five year supply of deliverable sites. It states that a buffer of 5% should be applied unless when measured against the housing Delivery Test the LPA has achieved less than 85% of its housing requirement. The results of the Housing Delivery Test published in February show that the Council has achieved 129% and therefore the buffer to be applied is 5%.
- 1.5 The implication of this for Bedford Borough is that given that the Council’s strategic policies in the Core Strategy and Rural Issues Plan were adopted in 2008 the assessment of five year housing land supply for development management purposes must for the time being be tested against an assessment based on the standard method.
- 1.6 It should be noted however that NPPF paragraph 214 states that the policies in the previous Framework will apply for the purpose of examining plans, where those plans are submitted on or before 24 January 2019 continues to apply. The Council submitted its 2030 Local Plan prior to this deadline and the transitional arrangements apply to the preparation of the plan. This means that five year land supply for the purpose of the Council’s plan making function will be determined on the basis of the Council’s Objectively Assessed Need for the period 2015-30 which is 970 dwellings per annum.
- 1.7 The Local Plan examination has already begun. Inspectors have been appointed and a start date for the hearing sessions has been provisionally set for May 28<sup>th</sup> 2019.

## **2. Housing provision to be delivered**

### **Plan making**

- 2.1 The Council's most recently adopted Local Plan is the Allocations and Designations Local Plan (ADLP adopted 2013) which brings forward allocations to meet the housing requirement set out in the Council's Core Strategy and Rural Issues Plan (CSRIP) adopted in 2008.
- 2.2 The CSRIP sets out the housing requirements for the Borough for the period 2001-21. In total 17,570 dwellings are planned for with the majority, 16,270, to be provided in the Growth Area centred on the urban area and the villages in the northern Marston Vale and the remainder to be located in the other rural parts of the Borough known as the Rural Policy Area.
- 2.3 Following the adoption of the ADLP the Council immediately started work on the preparation of a new Local Plan. An Issues and Options consultation took place in January and February of 2014 which started to scope the scale of housing and economic growth which will be needed over the next 20 years. A further consultation took place in autumn 2015 which included a second 'call for sites' that brought forward several large scale proposals for new settlements. The Council undertook a further consultation in Spring 2017 to invite comments on the outcome of that work and to inform the Council's decision about whether or not to include one or more new settlements as part of the plan's strategy for accommodating future growth. It then undertook a pre submission consultation in January to March of 2018 but did not submit the plan. It became evident from the representations made that the garden village at Colworth was not supported by an agreement between the promoter and the Santa Pod Raceway on which it relied. In response to this an amended plan Bedford Borough Local Plan 2030 draft for submission was subsequently prepared and consulted upon in September and October 2018. The plan was then submitted and as outlined in paragraph 1.7 above is now being examined.
- 2.4 For the purpose of the Local Plan 2030 consultants ORS carried out an update of the Strategic Housing Market Assessment in 2016 which now forms an addendum to the original document. The SHMA includes an objective assessment of the Council's housing needs (OAN) which takes account of the 2014 Sub National Population Projections and the 2014 based household projections. The full report is available on the Council's website. In summary the SHMA addendum establishes that the objectively assessed need for the Borough over the 15 year period between 2015 and 2030 is 14,550 which equates to 970 dwellings per annum.
- 2.5 The CSRIP strategy has worked well with significant development capacity currently available in the Bedford Growth Area. Until such time as the strategy is changed through the local plan process the focus for the delivery of new development will continue to be the Growth Area with development in the Rural Policy Area of a scale to support the need of local communities.

2.6 However, in terms of the Council's five year land supply for plan making purposes, it will be necessary to roll forward the period for the assessment from the CSRIP base date of 2001 to the base date set out in the calculation of objectively assessed need, i.e. 2015.

### Development Management

2.7 As explained in paragraph 1.5 above, until such time as the Council's strategic policies are updated, for development management purposes the calculation of the Council's five year supply will be based on the standard method. The calculation of the local housing need figure is set out in the NPPG as revised in February 2019 paragraph ID: 2a-004-20190220. Using this methodology the figure for Bedford Borough is 1314 per annum.

Table 1: The 5 year supply target

	Assessment for Plan Making			Assessment for development management
		<b>Dwellings</b>		
	<b>Objectively Assessed Need (15 years)</b>	14,550		<b>Local Housing Need ( 5years)</b>
	<b>Annual requirement</b>	970	1314	<b>Minimum annual local housing need</b>
<b>A</b>	<b>Five year requirement</b>	4850	6570	<b>Five year requirement</b>
	<b>completions in 2015/16, 2016/17 and 2017/18</b>	3569		
<b>B</b>	<b>Shortfall in plan period</b>	-659		
	<b>Delivery forecast for the five year period</b>			<b>Delivery forecast for the five year period</b>
	<b>2018/19</b>	1445	1445	
	<b>2019/20</b>	1229	1229	
	<b>2020/21</b>	1062	1062	
	<b>2021/22</b>	807	807	
	<b>2022/23</b>	564	564	
<b>C</b>	<b>Total 5 year dwelling forecast</b>	5107	5107	
<b>D</b>	<b>5% buffer (A+B) x 0.05</b>	210	329	<b>5% buffer (A+B) x 0.05</b>
<b>E</b>	<b>Five year target (5 year requirement plus shortfall plus 5% buffer) A+B +D</b>	4401	6899	<b>Five year target (5 year requirement plus shortfall plus 5% buffer) A+B +D</b>

<b>F</b>	<b>Annual Target E divided by 5</b>	880	1380	<b>Annual Target E divided by 5</b>
<b>G</b>	<b>Number of years supply</b> (deliverable supply divided by annual target) <b>C divided by F</b>	<b>5.80</b>	<b>3.7</b>	<b>Number of years supply</b> (deliverable supply divided by annual target) <b>C divided by F</b>

### 3. Development sites with the potential to deliver housing

3.1 The 5 year target will be met through the delivery of residential dwellings from different types of identified development sites. In order to qualify as a specific site which should be counted within the 5 year supply a site should meet the definition of deliverable set out in the glossary of the NPPF which reads:

**Deliverable:** To be considered deliverable, sites for housing 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:

a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be 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.

The assessment of deliverable sites draws on the Council's own intelligence in respect of individual sites supplemented by information gained through ongoing contact between developers and landowners and Planning and Council Tax Officers.

3.2 The types of sites which make a contribution to the five year supply are:

- Sites with planning permission or with the benefit of prior approval (Part 3, Class O of the GPDO 2015 (as amended))
- Sites with planning permission identified in the Bedford Borough Local Plan 2002
- Sites with planning permission identified in Bedford Borough Town Centre Area Action Plan 2008
- Sites with planning permission identified in the Allocations and Designations Local Plan (2013)

- Sites with planning permission subject to section 106 planning obligations
- Additional capacity on allocated sites
- Windfall

## **Windfall**

3.3 Paragraph 70 of the NPPF states that “Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends. Plans should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area.”

3.4 The Council has assessed the ten year trend of completions which have taken place on windfall sites in the Growth Area and Rural Policy Area. No account has been taken of completions on residential garden land. A summary of the windfall analysis is shown in Appendix 2.

## **4. Specific deliverable sites**

4.1 Appendix 3 sets out the specific sites that are likely to deliver housing over the next five years.

## **5. Conclusions**

5.1 The Council has identified a supply of specific deliverable sites that are likely to deliver an additional 5,107 dwellings in the five year period. When a 5% buffer is applied for plan making purposes this represents a supply of 5.80 years, for development management purposes this represents a supply of 3.70 years.

## Appendix 1: Recent housing delivery

Year	total completions	Relevant housing requirement target	Basis for the housing requirement
2011/12	919	879	Core Strategy and rural Issues plan
2012/13	654	879	Core Strategy and rural Issues plan
2013/14	997	879	Core Strategy and rural Issues plan
2014/15	828	879	Core Strategy and rural Issues plan
2015/16	964	884	Strategic Housing Market assessment 2015
2016/17	1255	950	Strategic Housing Market assessment Update 2016
2017/18	1350	950	Strategic Housing Market assessment Update 2016

## Appendix 2: Windfall analysis

A historic 10 year analysis of completions on non-allocated sites has been undertaken. No account has been taken of completions on garden land. The results are shown below.

### Growth Area

Year	Net completions on sites of 0-4 dwellings	Net completions on sites of 5-24 dwellings
2008/09	23	79
2009/10	22	20
2010/11	20	3
2011/12	31	30
2012/13	9	16
2013/14	25	70
2014/15	23	77
2015/16	15	85
2016/17	42	141
2017/18	48	103
Total	258	624
10 year average	26	62



## Rural Policy Area

Year	Completions on sites of 0-4 dwellings (net)	Completions on sites of 5-14 dwellings (net)
2008/09	16	23
2009/10	16	2
2010/11	13	4
2011/12	12	7
2012/13	14	2
2013/14	20	32
2014/15	22	5
2015/16	22	0
2016/17	31	9
2017/18	33	17
Total	199	101
10 year average	20	10

Appendix 3: Specific deliverable sites 2018/19 -2022/23

	Site name	Gross no. with planning permission /proposed	Total number of completions at 31/3/18	Number of units outstanding at 31/3/18	1 2018/19	2 2019/20	3 2020/21	4 2021/22	5 2022/23	Five year total
<b>Sites in Bedford and Kempston with planning permission for 25 units and above</b>										
	Bedford, Adj the heights	41	0	41	41					
	Bedford, Land at Lurke Street/St Cuthberts Street	49	0	49	49					
	Bedford,Putnoe Lower School	88	0	88	34	54				
	Bedford, Ensleigh House	60	0	60	60					
<b>Sites in the rural area with permission for 5 dwellings and above</b>										
	Wilstead, North End Farm/ Seasons car Park	39	0	39			39			
	Eastcotts, Land r/o sheds (eastern land parcel)	425	0	425	0	0	50	50	50	
	Eastcotts, south eastern land parcel	167	0	167	0	0	0	50	50	
	Eastcotts, RAF Cardington, western land parcel	108	0	108	0	0	25	40	43	
	Wixams, Land north of the Causeway	230	0	230	0	230				

	Wilstead,Whitworth Way	70	0	70		35	35			
	Clapham, 211 High Street (Folly Stores)	10	7	3	2					
	Stagsden, 23-25 High Street	9	0	8	8					
	Wilstead, 32 and rear of 34 Bedford Road	6	4	2	2					
	Bolnhurst and Keysoe, College Farm, Church Road	8	0	8	8					
	Oakley, 24 Lovell Road	15	0	15	15					
	Roxton Land adj Church Farm	5	0	5		5				
	Wyboston between 20 and 48 The Lane	11	0	11	11					
	Milton Ernest The Old Maltings	6	0	6		6				
	Clapham Former Stables at Park Fm Green Lane	5	0	5	5					
	Cotton End, formerly 161 High Road	5	0	5		5				
	Land at 59-61 Roxton Road	81	0	81			30	30	21	
<b>Adopted Local Plan sites with planning permissions</b>										
	Bedford, Britannia Works E & F, Kempston Road	206	111	95	49	46				
	Biddenham, Land north of Bromham Road	1300	178	1122	149	124	105	105	80	
	Great Denham	1710	1248	462	179	143	140			
	West of Kempston	1064	1041	23	23					
	Eastcotts, RAF Cardington, Shortstown Phase 3	250	0	250		58	52	50	50	
	Eastcotts, RAF Cardington, Shortstown phase 2	392	318	74	59	15				



