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# Housing Strategy

2021 - 2026

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## 1. Executive Summary

- 1.1 All Local Housing Authorities have a responsibility to produce a Housing Strategy which details how they will undertake their strategic housing role. This Strategy sets out Bedford Borough's housing objectives for the period 2021 - 2026 and how it will deliver them.
- 1.2 Bedford Borough's housing objectives must be delivered in the context of the national and local operating environment. There have been significant changes to both since the adoption of the Borough's Housing Strategy Review 2016 - 2020.
- 1.3 Significant legislation implemented since the adoption of Housing Strategy 2012 - on which the 2016 - 2020 Review was based - includes: The Localism Act 2011, Care Act 2014, The Self-build and Custom Housebuilding Act 2015, Housing and Planning Act 2016 and the Homelessness Reduction Act 2017.
- 1.4 The publication of the Rough Sleeping Strategy in 2018, the issuing of a revised National Planning Policy Framework in 2019 and Governments vision for the 'Oxford-Cambridge Arc' - to which Bedford Borough is central - have impacted on the national strategic and policy operating environment.
- 1.5 The provision of sufficient high quality, affordable homes contributes to the delivery of the goals and objectives of other adopted Borough strategies including the Sustainable Community Strategy 2009 - 2021, Bedford Borough Corporate Plan 2017 - 2021, Bedford Borough Joint Health and Wellbeing Strategy 2018 - 2023 and Bedford Borough Growth Plan 2018 - 2022.
- 1.6 Demographic considerations include significant forecast population growth, an aging population and affordability challenges. Bedford Borough also has a significantly higher Black and Minority Ethnic population than the East of England. 2011 Census data will be updated in 2021 and the new information obtained may impact on objectives during the lifetime of this Housing Strategy.
- 1.7 This Housing Strategy identifies four key themes and their associated objectives. These are:
- Understanding Housing Needs:  
*To ensure up to date information on the need for various forms of housing is available and understood such that it can be used to inform decision making in relation to housing provision within the Borough and in determining priorities.*
  - Delivering the Homes Required:  
*To ensure that the objectively assessed need for both market and affordable housing is delivered and to contribute actively to the growth anticipated for our region.*
  - Making Best Use of Existing Housing:  
*Make better use of our existing homes in the Borough including bringing empty properties back into use and addressing climate change and fuel poverty issues.*  
  
*Ensure that as much as possible of the affordable housing stock is fully occupied and where adaptations have been carried out they are available to those that need them.*

*Develop a robust approach to allocations and tenancies of affordable housing that meets the needs and priorities of the Borough and maximise the use of available resources.*

and

- Meeting the Housing Needs of Vulnerable People:

*To maximise the supply of specialist housing available to meet the identified needs of vulnerable groups including homeless households, those with a learning disability, mental health issue or physical disability, vulnerable older persons or those with specialist support needs such as those fleeing domestic violence.*

- 1.8 Sections 5 to 8 of this Strategy take each theme in turn and examine the relevant data sources, identify the issues faced and what the Council commits to doing in order to achieve the key objectives.
- 1.9 These commitments are gathered together in an Action Plan which identifies timescales, priorities and the parties responsible for delivering them. Progress made against this Action Plan will be monitored and reported upon annually.



## 2. Introduction

2.1 As a statutory housing authority Bedford Borough Council (the Council) is responsible for producing a Housing Strategy that details its vision for housing and which sets out objectives, targets and policies on how it intends to manage and deliver its strategic housing role. The Housing Strategy also provides an overarching framework against which the Council considers and formulates other policies on more specific housing issues.

2.2 This Strategy fulfils this for the period 2021 - 2026 by:

- Establishing the national legislative and policy contexts in which the Council's housing function must be delivered and summarising what the Council has done to date to address them.
- Identifying the local strategies and plans to which housing objectives must align and how they do so.
- Illustrating the relationship between the Housing Strategy, its key inputs and the outcomes needed to address housing issues.
- Identifying the four overarching housing themes for Bedford Borough which are:
  - Understanding Housing Needs
  - Delivering the Homes Required
  - Making Best Use of Existing Housing and
  - Meeting the Housing Needs of Vulnerable People

- In relation to these themes:
  - Detailing and analysing key data sources
  - Establishing the issues for Bedford Borough during the lifetime of this strategy
  - Identifying the actions necessary to address these issues and
  - Committing to deliver them within available resources.
- Providing an Action Plan which sets targets and timescales for the delivery of these actions and which will be monitored and reported against.

2.3 There are major potential changes in both the national and local operating environments which may impact significantly on housing and the local housing market during the period covered by this Strategy. Most notably these are:

- Central government's commitment to delivering its vision for the Oxford – Cambridge Arc (the Arc) – to which Bedford Borough is central - including the ambition to deliver up to one million high-quality new homes across the Arc by 2050.
- The delivery of East West Rail which could potentially release sites for housing growth. In January 2020, it was announced that East West Rail will come through Bedford Midland station which could add to the desirability of Bedford Borough as a place to live and increase the demand for housing.
- Having adopted Local Plan 2030 in January 2020, the requirement to produce a new Local Plan which takes into account the revised National Planning Policy Framework (NPPF) issued in February 2019.



- The potential for ongoing changes in the planning system including how the amount of housing which must be delivered through local plans is calculated, how sites are allocated for housing and the introduction of new affordable home ownership products, including First Homes.
- Housing demand uncertainty in the post Brexit era.
- The aftermath of the Covid-19 Pandemic.  
Whilst some of these potential changes could represent a risk to the delivery of some of the objectives of this Strategy others may present opportunities to do more. Risks and opportunities will be kept under constant operational review during the 5 years covered by this Strategy and action taken to mitigate risks and exploit opportunities taken where appropriate.

2.4 Significant achievements during the period covered by the previous Housing Strategy Review 2016 - 2020 are shown below. The challenge is for the Council and its partners to build upon these successes, working proactively together in a changing environment to meet the housing needs of the Borough's citizens identified in this new five-year strategy.



## Successes since the Housing Strategy Review 2016 - 2020

- ✓ Strategic Housing Market Assessment 2016 and its 2018 Update undertaken and published
- ✓ Gypsy and Traveller Accommodation Assessment 2017 commissioned and published
- ✓ Local Plan 2030 – prepared and adopted - with full input on housing policies from Housing Strategy Team
- ✓ Prepared, adopted and published:
  - Learning Disabilities Accommodation Strategy 2017 - 2022
  - Mental Health Accommodation Strategy 2018 - 2023
  - Older Persons Accommodation Strategy 2018 - 2023
  - Homelessness Strategy 2016 - 2021
  - Empty Homes Strategy 2019 - 2024
  - Tenancy Strategy 2019 - 2024
- ✓ Requirements of the Homelessness Reduction Act 2017 implemented
- ✓ Administration of the Housing Register returned to Council from bpha
- ✓ Secured more than £2.5m under a number of external funding initiatives to help tackle rough sleeping
- ✓ 15 bedspace 'somewhere safe to sleep hub' opened and occupied
- ✓ Reduced the estimated number of people sleeping rough from 59 in November 2016 to 30 in November 2019. Numbers peaked at 76 in 2017
- ✓ 29 dwelling scheme for those with complex needs facilitated and delivered
- ✓ Self and Custom Housebuilding Register established and maintained
- ✓ 3964 total homes completed in the three years April 2016 to March 2019 - against a target of 2910
- ✓ 890 affordable homes delivered in the three years April 2016 to March 2019 against a target of 768
- ✓ 17 affordable homes completed on two rural exception schemes – the first such schemes in the Borough for 10 years
- ✓ Additional Houses in Multiple Occupation licencing scheme introduced
- ✓ 443 adaptations funded by Disabled Facilities Grant completed between 2016 and 2019
- ✓ Housing Assistance Policy developed, adopted and published
- ✓ Building Research Establishment report on private sector housing commissioned, completed and published
- ✓ 306 empty properties brought back into occupation between 2016 - 2019 with the Council's active intervention
- ✓ Reduced the number of homes empty for more than 5 years between August 2016 and August 2019 by 19%
- ✓ Two affordable housing schemes - Derwent Place Bedford and Mill Road, Sharnbrook - shortlisted for National Housing Awards
- ✓ Planning permission granted - including negotiation of Affordable Housing Schemes – for major strategic sites including: Land North of Bromham Road, Biddenham, Land South of Fields Road, Wootton and further significant phases of RAF Cardington and Wixams.
- ✓ Establishing a Housing Committee as a sub-committee of the Council's Executive to consider specific housing related matters

## 3. The National Context

3.1 During the period covered by the previous Housing Strategy and its Review, there have been a number of national legislative and policy changes that have impacted upon housing generally and the way in which the Council meets the housing needs of its citizens in particular. The following is an overview of the main changes, their significant implications for housing and the actions the Council has taken to date in response to them.

### Localism Act 2011

3.2 The Localism Act 2011:

- Permitted Councils to discharge their duty to house homeless households by identifying for them suitable accommodation in the private rented sector
- Allowed Councils more flexibility in setting Lettings Policies for their own affordable housing to meet local needs and circumstances
- Allowed Councils to introduce additional eligibility criteria in their Allocation Schemes for affordable housing
- Enabled public sector landlords to offer “flexible” or fixed term tenancies of a recommended minimum of 5 years
- Put in place mechanisms for local communities to develop Neighbourhood Plans for their area

3.3 The Council has used the new powers as part of a portfolio of tools to help statutory homeless households by identifying suitable private rented accommodation for them. Between April 2016 and March 2019 there were 71 offers of accommodation in the private sector made to homeless households of which 52 were accepted.

3.4 The Council does not own affordable housing having transferred its stock to bpha (formerly Bedfordshire Pilgrims Housing Association) in 1990. It does not, therefore, let its own properties to which fixed term tenancies might apply.

3.5 However, to meet the requirements of the Localism Act 2011 the Council developed and adopted its Tenancy Strategy 2019 - 2024 which provides guidance to Registered Providers on how the Council believes they should apply fixed term tenancies. It also completed a Fixed Term Tenancy Review at the end of 2019 to identify the impact of the introduction of fixed term tenancies by its Registered Provider partners. Both documents are available here:

<https://www.bedford.gov.uk/housing/housing-strategies-and-policies/housing-development-and-policy/>

3.6 The Council reviewed its Allocation Scheme in 2013 specifically to respond to the Localism Act. The review introduced a local connection eligibility criteria, increased the degree of housing need required to access the register and redefined the banding criteria to ensure those in the highest need were given highest priority.



- 3.7 The Council has worked with local communities to support the development of Neighbourhood Plans. At February 2020, there were 21 designated neighbourhood areas nine of which have reached pre- submission consultation stage. Three had progressed to examination of which two had been approved at referendum.

### Welfare Reform Act 2012

- 3.8 The Welfare Reform Act 2012:
- Introduced Universal Credit, which replaced a range of means tested benefits and tax credits for people of working age.
  - Restricted Housing Benefit entitlement for social housing tenants whose accommodation is larger than they need.
- 3.9 Under Universal Credit claimants are paid monthly in arrears. This poses financial challenges for recipients and could impact on the ability of some of the most vulnerable households to sustain their tenancies, particularly those who live in private rented accommodation where the implementation of terms of tenancies are likely to be less flexible. In addition, the Universal Credit requirements may make it more difficult for vulnerable groups to secure private rented accommodation.
- 3.10 To help vulnerable households affected by these changes the Council introduced a Local Welfare Provision Policy in April 2013. This provides assistance to the most vulnerable residents in the form of crisis grants and community support grants for essential household items, subject to funds being available.

The Council's Local Welfare Provision Policy is available here:

<https://www.bedford.gov.uk/benefits-and-support/benefits-council-tax-support/local-welfare-provision/>

### Care Act 2014

- 3.11 Whilst The Care Act 2014 primarily focuses on how Councils determine who is eligible for care support and how that support is funded it also introduced a general duty on local authorities to promote an individual's 'wellbeing'. This can, amongst other things, include the suitability of living accommodation which may impact upon a person's physical, mental and emotional health.
- 3.12 The Council has developed and adopted specific accommodation strategies for vulnerable groups: those with learning disabilities, mental health issues and for older persons. An accommodation strategy for those with physical disabilities is in development. These strategies are available here:

<https://www.bedford.gov.uk/housing/housing-strategies-and-policies/housing-development-and-policy/>



## Self-build and Custom Housebuilding Act 2015

3.13 The Self-build and Custom Housebuilding Act 2015, and the associated Self-build and Custom Housebuilding Regulations 2016 require Councils to:

- Maintain a register of people who are interested in acquiring a serviced plot of land in their area in order to build a house for them to live in as their home (the Self Build Register)
- Have regard for the demand for self-build and custom build housing - as evidenced by the Self Build Register - when developing housing and planning policies and when they dispose of land in their ownership
- Grant planning permission for sufficient self-build/custom housebuilding plots to meet the demand on the Self Build Register over a rolling three-year period

3.14 The Council established a Self-Build and Custom Housebuilding Register in 2016. All those on the Register were asked to confirm their ongoing interest in August 2019.

3.15 Draft Policy 62 of Local Plan 2030 required sites of 100 dwellings or more to provide a minimum of 10% of dwelling numbers to be made available as serviced plots for custom or self-builders. This policy was not supported by the Local Plan Inspectors and it was removed as part of the modifications process. Whilst acknowledging that general support for self-build was in line with national guidance the inspectors considered that there was insufficient evidence at the time of the inquiry to support a 10% self-build plot requirement in the Draft Plan. This was in part due to the need to ask those on the Self Build Register to confirm that they wanted to remain on it.

This review has since been undertaken. General support for self-build is however maintained through adopted Policy 59S.

3.16 The Council has agreed a protocol that makes available information on the disposal of single plots in its ownership to those on the Self Build Register in advance of general marketing.

3.17 As at October 2019, permissions sufficient to meet the need established by the Self Build Register have been granted by the Council.

## Housing and Planning Act 2016

3.18 The Housing and Planning Act 2016:

- Required Councils to consider the sale of vacant council housing
- Introduced Starter Homes as an affordable home ownership housing category on new build developments
- Introduced a national data base of rogue landlords and property agents with powers to ban repeat offenders

3.19 The Council does not own affordable housing stock and thus the requirement to consider sale of vacant stock does not apply in Bedford Borough.

3.20 Policy 58S of the Council's Local Plan 2030, adopted in January 2020, allows for the provision of 'Intermediate Tenure' housing on new developments. The definition of Intermediate Tenure in the NPPF 2019 includes Starter Homes.

3.21 The Council keeps the activities of landlords and property agents under review. There have not been any activities in the Borough that have fulfilled the criteria for entry onto the national database of rogue landlords and agents since its introduction.

### Homelessness Reduction Act 2017

#### 3.22 The Homelessness Reduction Act 2017:

- Placed duties on Councils to intervene at earlier stages to prevent homelessness.
- Required Councils to provide homelessness services to all those affected not just those who have a 'priority need'.

3.23 The Council has introduced systems and processes to implement these requirements including restructuring the Housing Services team to ensure appropriate resources are in place to meet the new requirements.

### The Rough Sleeping Strategy August 2018

3.24 The Ministry of Housing, Communities and Local Government (MHCLG) published its Rough Sleeping Strategy in August 2018. Its stated aim is to halve rough sleeping by 2022 and end it permanently by 2027.

3.25 It required Councils to update their Homelessness Strategies to include rough sleeping by winter 2019.

3.26 The Council combined its Rough Sleeping and Homelessness Strategy Action Plans in November 2019.

3.27 The Council secured almost £700,000 in additional funding for 2018 - 2019 and 2019 - 2020 from the Rough Sleeper Initiative to support actions to reduce rough sleeping.

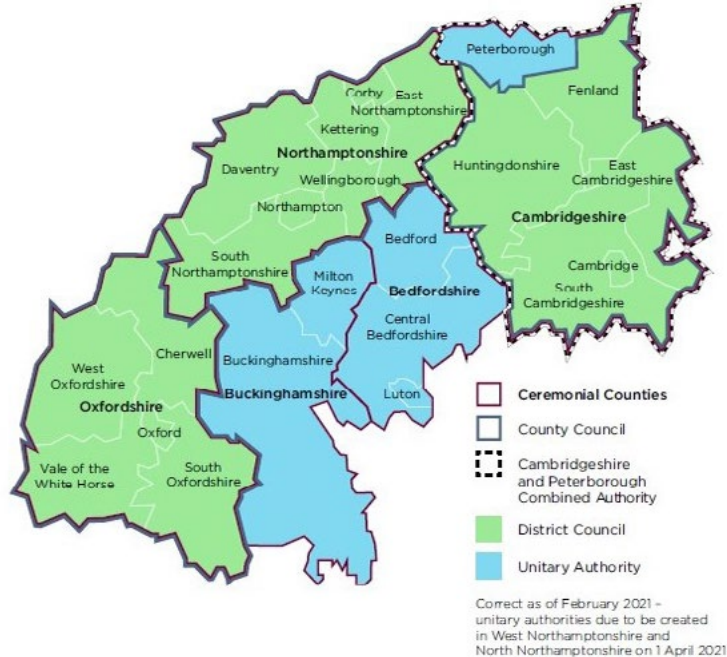
3.28 It has implemented a number of additional measures including the opening of a 29 dwelling complex needs scheme, the opening of a 15 bedspace 'somewhere safe to stay hub' and the appointment of a Rough Sleeper Co-ordinator and six additional third sector support workers.

3.29 These initiatives helped achieve a 60% reduction in the number of people sleeping rough during the period November 2017 - 2019, reversing the upward trend seen in previous years.



### The Oxford-Cambridge Arc

- 3.30 In March 2019, MHCLG published the paper ‘The Oxford-Cambridge Arc: Government ambition and joint declaration between Government and local partners’. This identified the area between the two cities – including Bedford Borough – as an area of significant economic potential and provided an update on the emerging approach of central government and local partners to support growth and prosperity in the area.
- 3.31 Delivery of this vision is a key economic priority for central government, and includes an ambition to deliver up to one million high-quality new homes across the Arc by 2050 and the completion of East West Rail and the eastern section of the proposed Expressway (from the M1 to Cambridge).



- 3.32 The Council is engaged in discussions with local authorities across the Arc and other key strategic partners to explore opportunities for growth in the Arc.
- 3.33 In February 2020, it was announced that the route of East West Rail would come through Bedford Midland Station.

### National Planning Policy Framework 2019

- 3.34 The National Planning Policy Framework (NPPF) sets out the Government’s planning policies for England and how these should be applied. The NPPF 2012 was replaced by a revised and updated framework in February 2019.
- 3.35 The 2019 NPPF contains a number of changes that impact significantly on the delivery of housing. These include:
- A revised methodology for calculation of local housing need
  - Introduction of a minimum size of site to which an affordable housing policy requirement can be applied
  - New policy on what can be counted towards five year land supply
  - Amendment of the definition of Affordable Housing to include new forms of affordable home ownership products.
- 3.36 The Council’s Local Plan 2030, adopted in January 2020, was developed in accordance with the requirements of the 2012 NPPF. A new Local Plan must be developed to accord with the 2019 NPPF during the lifetime of this Housing Strategy.



## 4. The Bedford Borough Context

### 4.1 Strategies and Plans

4.1.1 The Council and its partners have adopted a number of Strategies and Plans which form the local context in which this Housing Strategy must be delivered. Many of them intentionally contain similar themes, goals and priorities.

4.1.2 These strategies and plans are identified below along with the aims or objectives to which the provision of housing can make a significant contribution.

*Sustainable Community Strategy 2009 - 2021*

4.1.3 The Sustainable Community Strategy was produced in 2009 by the Bedford Borough Partnership. It's preparation was overseen by the Partnership Board which brought together representatives from Bedford Borough Council, the Police, NHS Bedfordshire, parish and town councils, schools, voluntary organisations, business and community groups. Those representatives no longer meet under the umbrella of the Partnership Board but continue to work jointly on a range of strategic and local issues.

4.1.4 Whilst the Deregulation Act 2015 removed the duty for local authorities to prepare a Sustainable Community Strategy, the existing Strategy still sets the overall strategic direction and vision for promoting and improving the economic, social and environmental well-being of the Borough.

4.1.5 The Strategy has seven goals: A Thriving, Greener, Aspiring, Healthy, Safer, Inclusive and Growing Borough each of which has a series of aims which detail how the goals will be achieved.

*Bedford Borough the Place to Grow:  
Bedford Borough Corporate Plan 2017 - 2021*

4.1.6 The Corporate Plan is part of the Council's adopted Policy Framework and contains its contribution to the delivery of the Sustainable Community Strategy.

4.1.7 It identifies four main goals:

- Support people
- Enhance places
- Create wealth
- Empower communities

The Sustainable Communities Strategy 2009 - 2021 and Bedford Borough the Place to Grow: Bedford Borough Corporate Plan 2017-2021 are available here:

<https://www.bedford.gov.uk/council-and-democracy/about-the-council/key-plans-and-strategies/>

*Bedford Borough Joint Health and Wellbeing  
Strategy 2018 - 2023*

4.1.8 The Joint Health and Wellbeing Strategy was developed by the Borough Council in partnership with those who commission services across the NHS, public health, adult social care and children's services and local Healthwatch representatives.

- 4.1.9 It identifies three priorities: give children and young people the best start in life; enable adults and older people to live well and remain independent and empower residents to create strong, safe and healthy communities.

The Joint Health and Wellbeing Strategy 2018 - 2023 is available here:

<https://www.bedford.gov.uk/social-care-health-and-community/health-and-wellbeing-board/>

- 4.1.10 It is underpinned by the Joint Strategic Needs Assessment (JSNA) a local assessment of current and future health and social care needs. The latest summary of the JSNA – which acknowledges the role played by warm, secure and safe housing on health and wellbeing (page 13) and considers homelessness and health (page 26) - is available here:

<https://bbcdevwebfiles.blob.core.windows.net/webfiles/Social%20Care%20Health%20and%20Community/Bedford%20JSNA/JSNA-Annual-Summary-2019.pdf>

[Bedford Borough Growth Plan 2018 - 2022](#)

- 4.1.11 The Bedford Borough Growth Plan supports business growth and aims to attract new investment into the Borough.

- 4.1.12 It's three broad themes of: grow business, enhance place and develop people have five priorities: to support the growth of start-up and existing businesses; attract new business to Bedford Borough; bring forward employment sites faster; promote the vitality of Bedford's Town Centre and support local people into local jobs. It also states that the Plan will support the development and delivery of strategic housing sites.

The Bedford Borough Growth Plan 2018 - 2022 is available here:

<https://www.bedford.gov.uk/business/invest-in-bedford/bedford-borough-growth-plan-2018-0-22/>

[South East Midlands Local Enterprise Partnership Strategic Economic Plan 2017](#)

- 4.1.13 The South East Midlands Local Enterprise Partnership (SEMLEP) was established in 2011. Its aim is to unlock the growth potential of the South East Midlands by bringing together partners from the public, private, education and not-for-profit sectors to secure infrastructure investment, develop a skilled workforce that meets employer's needs and provide business growth advice and access to finance to support key sectors.

- 4.1.14 The SEMLEP Economic Plan has seven priorities spread over the four themes of growing business; growing people; growing places and cross-cutting.
- 4.1.15 The Partnership administers the Government's Local Growth Fund to help unlock the delivery of housing sites.

How Housing relates to the Common Objectives of these Strategies

- 4.1.16 The delivery of suitable, high quality housing contributes to the common aims and objectives of these Strategies and Plans by providing stable homes which can:
  - Support the physical and mental health of residents. This is particularly the case where specialist housing is provided for those who are vulnerable.
  - Enable people to feel part of a settled community, relationships and support networks to be established and communities to develop and thrive.
  - Deliver enhanced social infrastructure such as open space, meeting places, medical facilities etc. on strategic sites.

- Enhance physical places by improving visual amenity. This is particularly the case where schemes involve the redevelopment of brownfield sites or are regeneration initiatives.
- Contribute to the creation of wealth by providing the workforce with access to affordable housing and creating jobs within the housing development, construction and associated industries. Generation of employment opportunities in turn helps to improve the financial circumstances of households, enabling them to access housing.
- Help deliver the housing aspirations set out in growth strategies.

4.1.17 Figure 1 shows the Housing Strategy's relationship to the national legislation, evidence and strategies that inform it and the outputs that in turn are informed by the Housing Strategy. The outputs are identified by its four themes.

Figure 1: Housing Strategy Relationship Chart – Information Inputs and Outcomes

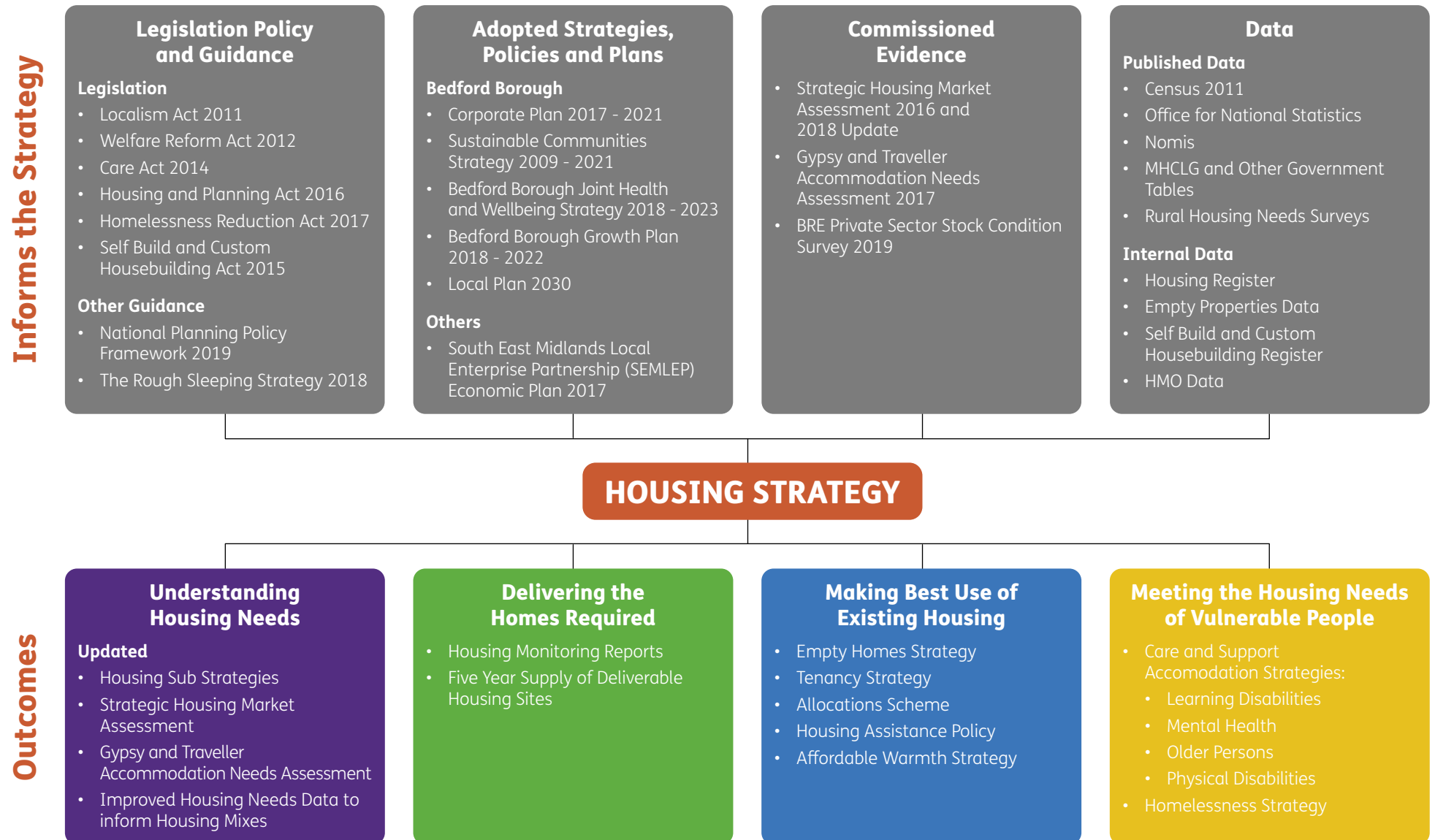
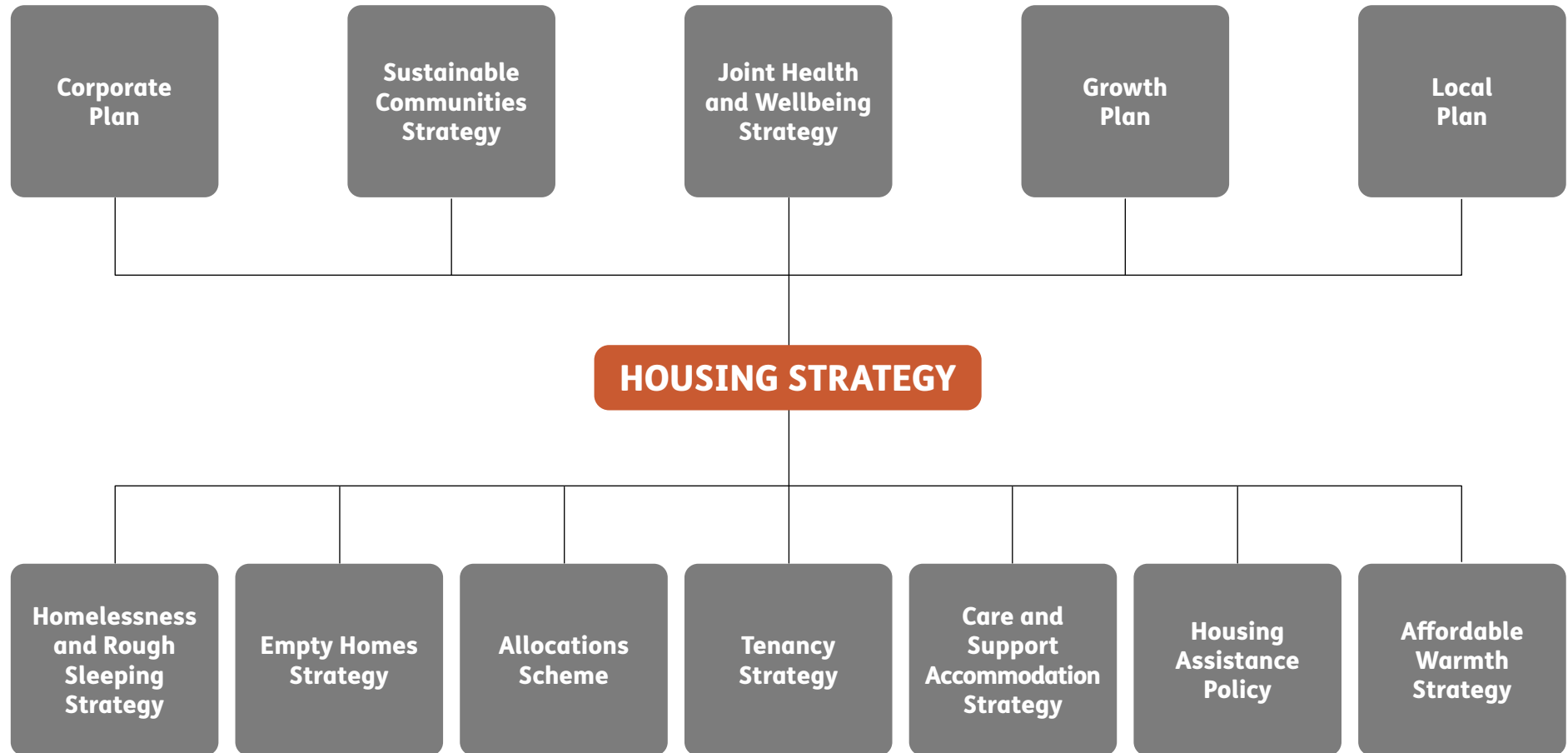




Figure 2 shows the hierarchical relationship between the Housing Strategy and other strategies and plans of the Council.

Figure 2: Housing Strategy Relationship Chart – Bedford Borough Council Strategy Hierarchy



## 4.2 Demographic Context – Understanding Our Population

The following information assists in understanding the demographic breakdown of the citizens of Bedford Borough. It is primarily based on data from the 2011 Census, which will be updated during the lifetime of this Housing Strategy. The age of the data is a limitation on the degree to which it might be relied upon, nonetheless a broad understanding the age, economic and ethnic profile of the Borough and how Bedford Borough compares to other areas assists in understanding potential housing issues.

It will be necessary to update the demographic knowledge base following the 2021 census and incorporate updated information into new housing sub strategies as they are revised and updated.

### Population Growth

4.2.1 Table 1 and Figure 3 show population forecasts for Bedford Borough, England and East of England up to 2040. The population of Bedford Borough is forecast to rise from 174,720 in 2020 to 193,928 in 2040, a rise of 11%. Over the same period the population of the East of England is forecast to rise by 7.9% and that of England by 8%. The forecast rise in Bedford Borough reflects the growth aspirations of central government. The largest estimated population increases for Bedford Borough are between 2020 and 2026 – the period covered by this Housing Strategy. The importance of continuing to meet targets for the delivery of the new homes needed to accommodate forecast population growth is acknowledged in Theme 2 – Delivering the Homes Required.

Table 1: Forecast Population Growth – Bedford Borough, England and East of England to 2040

Year	Bedford Borough Estimated	Bedford Borough % Increase	England Estimated (millions)	England % Increase	East of England Estimated	East of England % Increase
2019	173,000	-	56.3	-	6,240,417	-
2020	174,720	0.88	56.6	0.53	6,277,257	0.59
2021	176,212	0.85	56.9	0.53	6,312,979	0.57
2022	177,639	0.81	57.2	0.53	6,346,769	0.54
2023	178,997	0.76	57.5	0.52	6,378,396	0.50
2024	180,267	0.71	57.8	0.52	6,408,249	0.47
2025	181,441	0.65	58.0	0.35	6,435,996	0.43
2026	182,576	0.63	58.2	0.34	6,462,667	0.41
2027	183,627	0.58	58.5	0.52	6,487,935	0.39
2028	184,616	0.54	58.7	0.34	6,512,372	0.38
2029	185,555	0.51	58.9	0.34	6,535,936	0.36
2030	186,453	0.48	59.1	0.34	6,558,594	0.35
2031	187,287	0.45	59.3	0.34	6,580,494	0.33
2032	188,090	0.43	59.5	0.34	6,602,101	0.33
2033	188,866	0.41	59.7	0.34	6,623,525	0.32
2034	189,622	0.40	59.9	0.34	6,644,616	0.32
2035	190,336	0.38	60.1	0.33	6,665,142	0.31
2036	191,035	0.37	60.3	0.33	6,685,787	0.31
2037	191,722	0.36	60.5	0.33	6,706,744	0.31
2038	192,458	0.38	60.7	0.33	6,728,338	0.32
2039	193,196	0.38	60.9	0.33	6,750,245	0.32
2040	193,928	0.38	61.1	0.33	6,772,231	0.33
2041	194,664	0.38	61.3	0.33	6,794,441	0.33
2042	195,405	0.38	61.5	0.33	6,816,864	0.33
2043	196,146	0.38	61.7	0.33	6,839,413	0.33

Source: ONS, 2018-based Subnational Population Projections

Figure 3 Forecast Population Growth – Bedford Borough, England and East of England to 2040



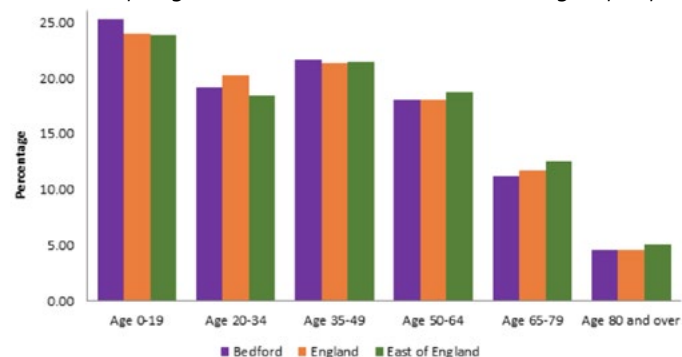
Source: ONS, 2018-based Subnational Population Projections

### Age

4.2.2 The most significant age related housing issue facing the Borough during the lifetime of this strategy is meeting the accommodation needs of an aging population.

Figure 4 shows age range of the population of Bedford Borough as at the 2011 Census.

Figure 4: Age Breakdown of Bedford Borough, England and East of England's Residents 2011 (Percentage of Population)



Source: Census 2011

The older persons' population was estimated to increase nationally by 90% over the 20 years following the 2011 census. It is forecast that the national increase will largely be in the population aged 80 and over, reflected in the 2011 Census data for Bedford Borough where almost 16% of the population was aged 65 and over (Housing LIN (December 2011) 'Strategic Housing for Older People: A resource pack').

The Council's Older Persons Accommodation Strategy 2018 - 2023 (OPAS) contains the strategy for meeting the accommodation needs of those aged 65 and over during the five years it covers and the delivery of its objectives is reflected in Theme 4 – Meeting the Needs of Vulnerable People.

Further extensive detailed analysis of age related demography in the Borough is contained within the OPAS and its Appendices. The OPAS will be updated during the lifetime of this strategy and will contain and consider updated demographic information following the census undertaken in 2021.

### Income and Employment

4.2.3 Table 2 shows the median earnings (gross weekly pay) in Bedford Borough, the East of England and England in 2018.

Median earnings in Bedford Borough were £577, lower than those for the East of England (£590) and England (£591). This is reflected in the hourly pay which was lower for Bedford Borough (£14.41) when compared to the East of England (£14.77) and England (£14.94).

Table 2: Median earnings for people living in Bedford Borough, East of England and England (2018)

	Bedford Borough (£)	East of England (£)	England (£)
<b>Gross weekly pay</b>			
Full time workers	577	590	591
<b>Hourly pay (excl overtime)</b>			
Full-time workers	14.41	14.77	14.94

Source: NOMIS

Table 3 shows the employment status of adults in Bedford Borough, England and the East of England April 2018 - March 2019. 80.6% of those aged 16 and over in Bedford Borough were economically active of which 77.7% were in employment. This is broadly consistent with data for the East of England (81.2% of which 78.4% in employment) and England (80.0% of which 76.9% in employment). Bedford Borough had a lower proportion of people who were self-employed (9%) than the East of England (11.4%) and the United Kingdom as a whole (10.7%).

Table 3: Employment Status of those aged 16 and over in Bedford Borough, East of England and England (April 2018 - March 2019)

	Bedford Borough (number)	Bedford Borough (%)	East of England (%)	England (%)
Economically Active	89,400	80.6	81.2	80.0
Total In Employment	86,300	77.7	78.4	76.9
Of which: Employees	76,800	68.7	66.8	64.4*
Of which: Self employed	9,400	9.0	11.4	10.7*
Unemployed	3,600	4.0	3.4	4.1*

\*United Kingdom. Source: NOMIS, figures do not sum in NOMIS

Table 4 shows the number and percentage of the population of Bedford Borough and the percentage of the population of the East of England and England who were economically inactive between April 2018 - March 2019.

19.4% of those aged 16-64 in Bedford Borough were economically inactive. This is slightly higher than in the East of England (18.8%) but slightly lower than for England as a whole (20.9%). Reasons for economic inactivity include being a student, looking after family / home, long term sick and retired.

Of those economically inactive in Bedford Borough 23.1% were retired. This is significantly more than the East of England (16%) and England (12.5%). This supports the evidence of an aging population in Bedford Borough.

Table 4: Economic Inactivity in Bedford Borough and East of England, people aged 16-64 (April 2018 - March 2019)

	Bedford Borough (number)	Bedford Borough (%)	East of England (%)	England (%)
<b>Total Economically Inactive</b>	<b>20,400</b>	<b>19.4</b>	<b>18.8</b>	<b>20.9</b>
Of those economically inactive:	Number	% of those economically inactive		
Student	4,400	21.5	23.1	27.0
Looking after family/home	4,200	20.8	25.3	24.3
Long-term sick	4,300	20.8	21.6	22.4
Retired	4,700	23.1	16.0	12.5
Other	2,800	14.0	14.0	14.0
<b>TOTAL</b>	<b>20,400</b>	<b>100</b>	<b>100</b>	<b>100</b>

Source: NOMIS



Table 5 shows the number and percentage of households in Bedford Borough and the East of England that were workless in 2018. Data is not available for England. A household is workless when no one in the household is in employment. There were 8,500 workless households in Bedford Borough between January and December 2018. The percentage of households that were workless (14.7%) in Bedford Borough was higher than the East of England percentage (12.2%) but broadly similar to the United Kingdom as a whole (14.3%).

Table 5: Workless Households in Bedford Borough (January – December 2018)

	<b>Bedford Borough</b>	<b>East of England</b>	<b>United Kingdom*</b>
Number of Workless households	8,500	238,200	2.920m
Percentage of households that are workless	14.7	12.2	14.3

\*Data not available for England  
Source: NOMIS

The Strategic Housing Market Assessment (SHMA – see Section 5.2.1) predicts that the economically active population will increase by around 9,800 persons over the 20-year period 2015 - 2035, concluding that taking into account identified changes in double jobbing the increase in resident workers could support up to 11,400 additional jobs in Bedford during that time.

This workforce will require housing that is suitable – in terms of location, affordability, size and tenure – the delivery of which is a focus of Theme 2 of this strategy ‘Delivering the Homes Required’.

Table 6 shows the number and percentage of out of work benefits claimants for Bedford Borough and the percentages for the East of England and England August 2014 - August 2019.

In common with the East of England and England, Bedford Borough saw a decrease in the percentage of work benefit claimants between August 2014 and August 2016 after which the percentages increased to their highest levels in the 5 year period at August 2019. Universal Credit was introduced in Bedford Borough in May 2017 which was relatively early in the national roll-out programme. Universal Credit rules require a wider range of claimants to look for work than those claiming the previously applicable Jobseeker’s Allowance. This may help explain the increase in all areas in the later years of the period.

Table 6: Out of Work Benefits - Claimants aged 16-64 in Bedford Borough August 2014 - August 2019

	<b>Aug 2014</b>	<b>Aug 2015</b>	<b>Aug 2016</b>	<b>Aug 2017</b>	<b>Aug 2018</b>	<b>Aug 2019</b>
Bedford Borough	2,690	2,315	2,135	2,380	3,160	3,545
Bedford Borough (%)	2.6	2.2	2	2.3	3	3.4
East of England (%)	1.7	1.3	1.2	1.3	1.5	2.1
England (%)	2.6	2.1	2.1	2.1	2.4	3.2

Source: NOMIS

House Prices, Rents and Affordability

4.2.4 Table 7 shows that average property prices in Bedford Borough for all property types increased steadily between October 2015 and October 2018. They then decreased slightly for all property types in the year to October 2019. The percentage increase for all properties over the period was 23.4%. This percentage increase is broadly consistent across the house-types.

Table 7: Average House Prices in Bedford Borough by Property Type October 2015 – October 2019

	Oct 2015	Oct 2016	Oct 2017	Oct 2018	Oct 2019	Increase Oct 2015 - Oct 2019
Detached	£375,568	£433,742	£459,196	£470,856	£467,791	24.6%
Semi	£228,030	£263,347	£278,967	£286,738	£284,918	24.9%
Terraced	£182,326	£209,279	£220,665	£226,116	£223,526	22.6%
Flat	£135,096	£156,198	£167,668	£168,276	£162,489	20.3%
All	£232,835	£268,492	£284,696	£290,994	£287,412	23.4%

Source: [landregistry.data.gov.uk](http://landregistry.data.gov.uk)

Table 8 shows median monthly rents in Bedford Borough by property type between 2014 - 2015 and 2018 - 2019 and the percentage by which they have increased during that period. The average increase across all property types is 19.2%. The highest increases are in the studio and 4 bedroomed plus properties, although the increase in the 4 bedroomed plus properties occurred in 2014 - 2015 and this has since stabilised.

Table 8: Median Monthly Rent Values in Bedford Borough

	2014 - 2015	2015 - 2016	2016 - 2017	2017 - 2018	2018 - 2019	Increase
Room	£350	£350	£365	£420	£395	12.9%
Studio	£350	£450	£450	£475	£458	30.9%
1 bedroom	£495	£525	£575	£600	£595	20.2%
2 bedroom	£650	£695	£750	£750	£750	15.4%
3 bedroom	£750	£815	£895	£895	£900	20.0%
4 or more bedrooms	£1,000	£1,250	£1,250	£1,250	£1,250	25.0%
All categories	£650	£695	£750	£775	£775	19.2%

Source: Valuation Office Agency

The affordability ratio shows the relationship between median house prices and median incomes. It is used by the NPPF 2019 as part of the Standard Methodology for calculating Objectively Assessed Need for housing for planning purposes. Table 9 shows the affordability ratio for local authorities in Bedfordshire, selected local authorities from adjoining counties and for England and the East of England for the period 2012 - 2018.

The affordability ratio for Bedford Borough rose from 7.32 to 9.82 over the period 2012 - 2018, a rise of 34%. In the same period the affordability ratio for England rose from 6.77 to 8.00 (18.2%) and for the East of England from 6.79 to 9.12 (34%). The rise in the affordability ratio in Bedford Borough is therefore consistent with the East of England but significantly greater than that of England as a whole. Housing markets are generally more localised so this is not counter intuitive. In 2018 Bedford Borough had the second highest affordability ratio of the Bedfordshire and adjoining local authorities, though some from neighbouring counties (without an adjoining boundary with Bedford Borough – Cambridge and South Cambridgeshire for example) had higher ratios.

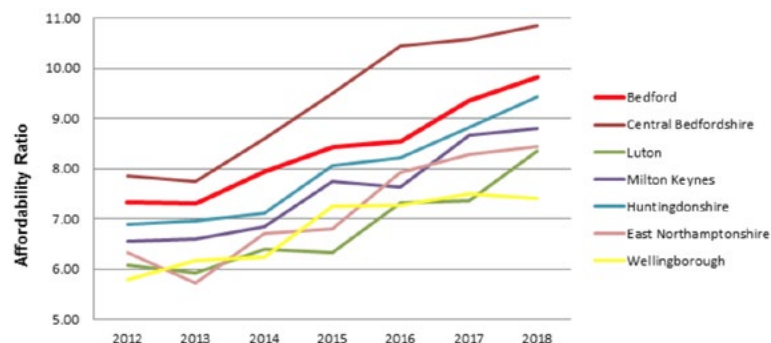
Table 9: Affordability Ratios for Bedfordshire and Selected Neighbouring Local Authorities, England and East of England between 2012 and 2018

Local Authority	2012	2013	2014	2015	2016	2017	2018
<b>Bedfordshire</b>							
<b>Bedford</b>	<b>7.32</b>	<b>7.31</b>	<b>7.94</b>	<b>8.43</b>	<b>8.55</b>	<b>9.35</b>	<b>9.82</b>
Central Bedfordshire	7.85	7.75	8.60	9.51	10.44	10.57	10.86
Luton	6.08	5.93	6.40	6.34	7.31	7.36	8.35
<b>Milton Keynes</b>	<b>6.55</b>	<b>6.61</b>	<b>6.84</b>	<b>7.74</b>	<b>7.63</b>	<b>8.66</b>	<b>8.81</b>
<b>Cambridgeshire</b>							
Peterborough	5.01	5.07	5.54	5.76	5.93	6.64	6.79
Cambridge	9.44	9.61	11.39	12.55	13.00	13.53	12.95
Huntingdonshire	6.89	6.96	7.11	8.06	8.22	8.82	9.44
South Cambridgeshire	7.42	7.74	7.80	9.15	10.26	10.98	10.25
<b>Northamptonshire</b>							
Corby	5.08	5.48	5.53	5.88	5.96	6.36	6.68
Daventry	6.86	6.87	7.82	7.99	10.29	10.22	10.27
East Northamptonshire	6.32	5.73	6.71	6.81	7.92	8.29	8.45
Kettering	5.25	5.86	6.04	6.08	6.56	7.02	7.81
Northampton	5.36	5.26	6.14	6.69	6.84	7.28	7.60
South Northamptonshire	9.11	8.46	8.55	9.83	10.72	10.30	10.49
Wellingborough	5.79	6.18	6.25	7.26	7.27	7.49	7.40
<b>England</b>	<b>6.77</b>	<b>6.76</b>	<b>7.09</b>	<b>7.53</b>	<b>7.72</b>	<b>7.91</b>	<b>8.00</b>
<b>East of Eng;and</b>	<b>6.79</b>	<b>6.94</b>	<b>7.30</b>	<b>7.86</b>	<b>8.33</b>	<b>9.10</b>	<b>9.12</b>

Source: Office for National Statistics

Figure 5 shows affordability ratios for Bedfordshire local authorities and those adjoining Bedford Borough. Bedford Borough has the second highest affordability ratio of geographically collocated local authorities.

Figure 5: Affordability Ratios – Bedfordshire Local Authorities and Those Adjoining Bedford Borough 2012 - 2018



Source: Office for National Statistics

As part of its determination of Market Signals the SHMA considers in significant detail the affordability of both open market sale (Local House Prices, para 5.59ff, p105) and private rented (Private Rent, paras 5.66ff, p106) tenures. Affordability has, therefore, been taken into account in determining the level of affordable housing required on new development schemes. A further summary of the key findings of the SHMA is included in section 5.2 – Theme 1 – Understanding Housing Needs, Data Sources, below.

## Ethnicity

4.2.5 Table 10 shows that at 2011 80.6% of the Boroughs population was from White Ethnic Groups. This is less than for England (85.5%) and significantly less than for the East of England (91.2%).

A total of 19.4% of Bedford Borough’s population was from Black and Minority Ethnic Groups in comparison to 8.8% in the East of England and 14.5% in England generally.

The most significant BME group in Bedford Borough was Asian/ Asian British (11.5%) of which Indian (5.2%) was the largest group. Asian /Asian British comprise 7.7% of the population of England and 4.8% of the East of England.

Bedford Borough also had a significant Black / African / Caribbean / Black British population (3.9%). Although broadly similar to England (3.4%) this is almost double that for the East of England (2%).

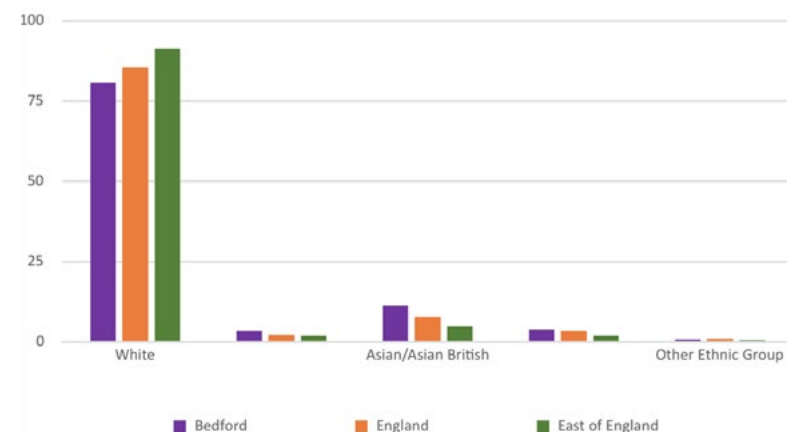
Table 10 and Figure 6 show the ethnic breakdown of Bedford Borough in 2011 along with that of England and the East of England.

Table 10: Ethnic Breakdown of Bedford Borough, England and East of England's Population 2011

Ethnic Group	Ethnic Group Category	Bedford Borough		England	East of England
		Number	%	%	%
<b>All usual residents</b>	-	<b>157,479</b>	-	-	-
White	British	112,588	71.5	79.8*	85.3
	Irish	1,683	1.1	1.0	1.0
	Gypsy or Irish Traveller	115	0.1	0.1	0.4
	Other White	12,460	7.9	4.6	4.5
<b>Total White Population</b>		<b>126,846</b>	<b>80.6</b>	<b>85.5</b>	<b>91.2</b>
Mixed / Multiple Ethnic Groups	White and Black Caribbean	2,396	1.5	0.8	0.6
	White and Black African	587	0.4	0.3	0.3
	White and Asian	1,366	0.9	0.6	0.6
	Other Mixed	1,037	0.7	0.5	0.5
<b>Total Mixed Population</b>		<b>5,386</b>	<b>3.5</b>	<b>2.2</b>	<b>2.0</b>
Asian / Asian British	Indian	8,122	5.2	2.6	1.5
	Pakistani	3,270	2.1	2.1	1.1
	Bangladeshi	3,225	2.0	0.8	0.6
	Chinese	905	0.6	0.7	0.6
	Other Chinese	2,410	1.5	1.5	1.0
<b>Total Asian / Asian British Population</b>		<b>17,932</b>	<b>11.4</b>	<b>7.7</b>	<b>4.8</b>
Black / African / Caribbean / Black British	African	2,741	1.7	1.8	1.2
	Caribbean	2,843	1.8	1.1	0.6
	Other Black	618	0.4	0.5	0.2
<b>Total Black / Black British Population</b>		<b>6,202</b>	<b>3.9</b>	<b>3.4</b>	<b>2.0</b>
Other Ethnic Group	Arab	331	0.2	0.4	0.2
	Any Other Ethnic Group	782	0.5	0.6	0.3
<b>Total Other Population</b>		<b>1,113</b>	<b>0.7</b>	<b>1.0</b>	<b>0.5</b>

Source: ONS 2011 Census Data

Figure 6: Ethnic Breakdown of Bedford Borough, England and East of England's Population 2011



Source: ONS 2011 Census Data



## 5. Theme 1 – Understanding Housing Needs

### Key Objective

5.1 The key objective in relation to Understanding Housing Needs is:

***To ensure up to date information on the need for various forms of housing is available and understood such that it can be used to inform decision making in relation to housing provision within the Borough and in determining priorities.***

### Data Sources

5.2 The following are the key data sources relating to ‘Understanding Housing Needs’ and what each tells us:

#### Strategic Housing Market Assessment – Housing Needs

5.2.1 The Strategic Housing Market Assessment (SHMA) was produced by Opinion Research Services in 2016 to identify the Objectively Assessed Need for housing in support of draft Local Plan 2035. It was updated in 2018 to take into account a change of plan period to 2030. It identifies the housing required by tenure, size and mix and provides information on the need for accommodation to meet specialist needs such as wheelchair adapted housing.

Key housing needs findings of the SHMA are:

- The objectively assessed need for housing for Bedford Borough for the 15-year period 2015 - 2030 is 14,551 new dwellings - on average 970 per year.
- The affordable housing requirement, included in the total of 14, 551 above, is for 4,188 dwellings – on average 279 per year.
- An affordable housing requirement of 30% of new housing is needed.
- Of the 30% affordable housing provision 78% should be for affordable rented and 22% for intermediate tenure.
- Starter Homes (a form of discounted market sale home ownership) does not address the same affordability criteria as shared ownership. Any target for Starter Homes should be considered as being additional to the overall affordable housing need that the SHMA identified.
- 49% of all new housing should meet building regulation M4 Category 2 Accessible and Adaptable Dwellings.

- 5% of all market housing and 7% of all affordable housing should meet building regulation M4 Category 3 – wheelchair user dwellings.
- All specialist accommodation for older persons should achieve compliance with Category 3.
- 1,769 specialist homes for Older Persons are needed up to 2035. This includes around 900 sheltered homes (535 owner occupied and 358 for rent) and almost 900 extra care homes (533 owner occupied and 343 for rent).

The SHMA 2016 and the 2018 Addendum are available here (Document 1)

<https://edrms.bedford.gov.uk/PlanningBrowse.aspx?id=YusA5qiON3sL1VM1Bte50w%3d%3d>

#### Rural Housing Needs Surveys

- 5.2.2 Rural Housing Needs Surveys provide housing needs information specific to individual rural settlements or parishes.

In Bedford Borough they are usually - though not exclusively - undertaken by the Bedfordshire Rural Communities Charity (BRCC) on behalf of parish councils in connection with potential rural exception schemes or Neighbourhood Plan groups as part of the evidence base for their plans.

At February 2020 there were 16 rural housing needs surveys that had been published within the preceding five years.

- Thurleigh
- Bletsoe
- Colmworth
- Bromham
- Sharnbrook
- Clapham
- Ravensden
- Oakley
- Carlton and Chellington
- Stagsden
- Harrold
- Felmersham and Radwell
- Turvey
- Wootton
- Willington
- Wilden

A further five are in production:

- Wymington
- Riseley
- Little Staughton
- Wilstead
- Sharnbrook (update)

Individual surveys reveal detailed information on needs by tenure and property type and are available from the organisations that commissioned them.

*Self Build and Custom Housebuilding Register*

5.2.3 The Self Build Register (see 3.13 above) helps the Council to understand the demand for self- build plots in the Borough. As at 31st December 2019 there were 115 individuals and 1 Association on the register.

Table 11 shows the number of registrants by their stated preference for dwelling bedroom size.

The majority of registrants (61%) expressed a preference for a plot which could accommodate a property with 4 or more bedrooms. Only one individual stated a preference for a plot sufficient for a 1 or 2 bedroom property.

*Table 11: Bedroom Size Preference of Individuals on the Self Build and Custom Housebuilding Register*

Number of bedrooms	Number of Individuals
1 or 2 bed	1
2 bed	5
2 or 3 bed	1
3 bed	30
3 or 4 bed	10
4 bed	32
4 or 5 bed	12
5+ bed	18
1 to 5 beds	8
TOTAL	115

Source: Self Build Register

Registrants are also asked to provide details of their preferred location for a self-build plot. Co-located rural areas are grouped for this purpose. Applicants are able to express a preference for more than one location. Table 12 shows registrants preferences by location at December 2019:



Table 12: Location Preferences of Individuals on the Self Build and Custom Housebuilding Register

Grouping	Parishes in the Group	Number of registrants indicating a preference for location
Group 1	Dean & Shelton, Melchbourne & Yelden, Knotting & Souldrop, Sharnbrook	43
Group 2	Wymington, Podington, Odell, Harrold	46
Group 3	Pertenhall & Swineshead, Riseley, Bolnhurst & Keysoe	38
Group 4	Little Staughton, Staploe, Colmworth, Wyboston Chawston & Colesden, Little Barford, Roxton	45
Group 5	Bletsoe, Thurleigh, Felmersham & Radwell, Milton Ernest	62
Group 6	Carlton & Chellington, Pavenham, Stevington	47
Group 7	Oakley	21
Group 8	Clapham	15
Group 9	Ravensden, Wilden, Renhold, Brickhill	67
Group 10	Bromham, Biddenham, Gt. Denham	78
Group 11	Turvey, Stagsden, Kempston Rural, Wootton, Stewartby	82
Group 12	Kempston Town	9
Group 13	Bedford Town	25
Group 14	Elstow, Wilshamstead, Wixams	27
Group 15	Cople, Cardington, Eastcotts	35
Group 16	Gt. Barford, Willington	25
Group 17	Any of the above	32
Group 18	Any Excluding Bedford & Kempston Towns	28

Source: Self Build Register

Rural areas in Groups 5, 9, 10 and 11 have the highest number of preferences. Only 25 preferences were shown for Bedford Town and 9 for Kempston Town.

Table 13 shows the number of individuals on the Bedford Borough Self Build and Custom Housebuilding Register 2015 - 2019. The Council has a duty to grant planning permission for sufficient plots suitable for self-build / custom housebuilding to meet the demand on the register within 3 years of the recorded number on the Register. The Council has met this obligation for 2015 - 2016 by providing in excess of the 50 Register entrants by 2018 - 2019.

Table 13: Number of Individuals or Associations on the Bedford Borough Self Build Register 2015 - 2019

Year (October)	Number on the Register
2015 - 2016	50
2016 - 2017	137
2017 - 2018	172
2018 - 2019	110

Source: Annual Self Build Returns

#### Affordable Home Ownership – Help to Buy Agent Data

5.2.4 Information from the Help to Buy Agent provides data on the demand for shared ownership homes in Bedford Borough.

The data available from the Help to Buy Agent for Bedford Borough reveals that 701 households had inquired about shared ownership in Bedford Borough in 2019 - 2020. Of these, 391 (55%) were recorded as looking for a maximum of 2 or 3 bedrooms.

The full breakdown provided is as follows:

- 22 stated a preference for a maximum of 2 bedroomed property
- 369 stated a preference for a maximum of 3 bedroomed property
- 196 stated a preference for a maximum of 4 bedroomed property
- 2 stated a preference for a maximum of 5 bedroomed property
- 112 did not specify a preference for bedroom size

The Help to Buy Agent has advised that these are ‘leads’ and that they are unable to confirm that all these households would qualify for, or be able to afford, shared ownership.

Anecdotally they confirm that the average initial share being purchased by customers is reducing over time and that the lack of availability of 4 bedroomed properties for shared ownership means that demand far exceeds supply.

Whilst this data is helpful, it is superficial and anecdotal. The availability of more robust data would better inform the demand for shared ownership generally and the mix of house types in particular.

Notwithstanding this, the number of inquiries far exceeds the delivery of new shared ownership housing in the Borough (see Table 18 below) – evidencing the ongoing relevance of it as an affordable home ownership product.



Housing Register

5.2.5 The Council’s Housing Register provides information on the need for affordable and social rented properties in the Borough.

Table 14 shows the total number of applicants on the Housing Register by application category by quarter over the 12 months from September 2018 to September 2019. In 2019 new definitions of homeless relief, prevention and homeless were added to the applicant categories.

Table 14: Total Registrants by Application Category

Applicant Category	Sep 2018	Dec 2018	Mar 2019	Jun 2019	Sep 2019
Homeless Accepted	68	99	74	120	103
Homeless Relief	N/A	N/A	N/A	6	29
Homeless Prevention	N/A	N/A	N/A	2	20
Homeless	N/A	N/A	N/A	13	11
Housing Register	674	708	674	637	663
Transfers (bpha)	226	223	203	208	183
Other RP tenants	168	202	199	192	231
Sheltered	0	0	0	10	0
<b>Total</b>	<b>1136</b>	<b>1232</b>	<b>1150</b>	<b>1188</b>	<b>1240</b>

Source: Housing Register

The number of applicants on the Housing Register has increased from 1136 to 1240 in the year from September 2018 to 2019, a rise of 9%. The number of Homeless Accepted increased from 68 in September 2018 to 103 in September 2019. The number of transfer applicants dropped from 226 to 183 whereas the number of other Registered Provider tenants increased from 168 to 231 in this period.

Table 15 shows the total number of applicants on the Housing Register by bedroom need by quarter over the 12 months from September 2018 to September 2019:

Table 15: Total Registrants by Bedroom Need<sup>663</sup>

Number of bedrooms	Sep 2018	Dec 2018	Mar 2019	Jun 2019	Sep 2019
1 bed	387	445	475	486	542
2 bed	348	379	313	323	326
3 bed	346	235	210	202	196
4 bed	43	134	113	140	143
5 bed	5	29	27	29	25
6 bed	7	10	10	8	8
7 bed	0	0	2	0	0
<b>Total</b>	<b>1136</b>	<b>1232</b>	<b>1150</b>	<b>1188</b>	<b>1240</b>

Source: Housing Register

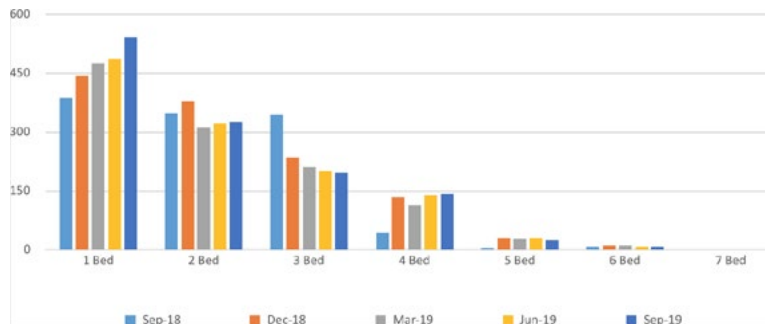
The highest need at September 2019 was for 1 bedroom (44%) and 2 Bedroom (26%) dwellings, with 16% demand for 3 bedroomed dwellings. A total of 70% of households on the Housing Register required a one or two bedroom property.

During the period the demand for:

- 1 bedroomed properties increased steadily and significantly – from 387 to 542 properties (43%)
- 2 bedroomed properties decreased slightly from 348 to 326 properties (6%) but overall remained relatively stable
- 3 bedroomed properties decreased significantly from 346 to 196 properties (43%)
- 4 bedroomed + properties increased significantly from a total of 55 properties to 176 properties (220%)

This is illustrated in Figure 7 below:

Figure 7: Total Registrants by Bedroom Need



Source: Housing Register

Table 16 shows the total number of applicants on the Housing Register by banding priority over the 12 months from September 2018 to September 2019:

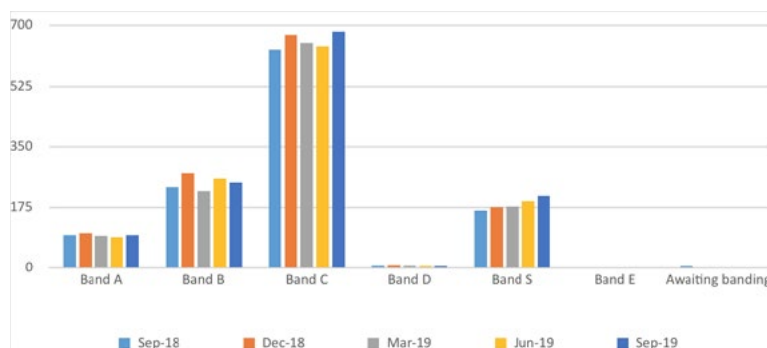
Table 16: Total Registrants by Band

Band	Sep 2018	Dec 2018	Mar 2019	Jun 2019	Sep 2019
Band A	95	101	93	90	95
Band B	233	275	222	260	246
Band C	631	762	650	640	683
Band D	7	9	7	5	6
Band S	165	175	178	192	208
Band E	0	0	0	0	0
Awaiting banding	5	0	0	1	2
<b>Total</b>	<b>1136</b>	<b>1232</b>	<b>1150</b>	<b>1188</b>	<b>1240</b>

Source: Housing Register

At September 2019 of the 1240 applicants a total of 341 (28%) were in bands A (Urgent Housing Need) and B (High Housing Need – Multiple Needs). The majority of households (55%) were in band C (Housing Need). The relative size of the number of applicants in each banding has remained substantially the same over the period as illustrated by Figure 8 below:

Figure 8: Total Registrants by Band



Source: Housing Register

The Housing Register data shows those households who qualify for the Register under the current Allocation Scheme criteria. In 2018 - 2019, 4,771 applications to join the Register were received. In 2019 - 2020, 6,337 applications were received. These figures are significantly higher than the number of households on the Register. Reasons for non-qualification include having in excess of maximum income or asset criteria so Register applications are not necessarily an indicator of housing need. Nonetheless they are an indication of the number of households hoping to access affordable housing. As detailed in paragraphs 7.3.7 and 7.4.9, the Allocation Scheme is regularly reviewed. If the eligibility criteria for joining the Register change the numbers on it may increase (or decrease) accordingly.

### Gypsy and Traveller Accommodation Assessment 2017

5.2.6 The Gypsy and Traveller Accommodation Assessment (GTAA) 2017 was produced by ORS to support the development of the local plan. It provides an assessment of the need for Gypsy and Traveller pitches and Travelling Showpeople plots in the Borough up to 2035. It takes into account Planning Policy for Traveller Sites (PPTS) 2015 which updated the definition of travellers such that those who have ceased to travel permanently do not fall under the planning definition of a traveller for the purposes of assessing accommodation need.

The key findings of the GTAA are:

- Two Gypsy and Traveller pitches are required up to 2035, one in the 5 year period 2021 - 2026 and one in the five year period 2026 - 2031
- Five plots for Travelling Showpeople are required in the period 2016 - 2021

The GTAA 2017 is available here (Document 13):

<https://www.bedford.gov.uk/planning-and-building/planning-policy-its-purpose/planning-for-traveller-sites/>

## Issues for Bedford Borough

### 5.3 The key issues for Bedford Borough in relation to Understanding Housing Needs are:

#### Updating the SHMA for the Local Plan review

- 5.3.1 The Council will need to update its data on housing needs such that it can reliably inform future housing strategies and policies. A new Local Housing Need Assessment (LHNA) will be required to provide the housing needs evidence base for the new Local Plan.

The assessment will be based upon the requirements of NPPF 2019, including data relevant to understanding emerging and innovative forms of tenure and the new Standard Methodology for calculating objectively assessed need.

Since the publication of the SHMA the government has issued consultation on the introduction of First Homes, a similar discounted sale home ownership product to Starter Homes which emphasises the imperative to understand new housing products and the contribution they can make to meeting identified housing needs.

#### Updating Demographic Knowledge Base post Census 2021

- 5.3.2 The demographic information contained within this Housing Strategy and its various sub strategies is based upon the census data collected in 2011. A new census will be undertaken in 2021 and it will be necessary to consider the updated information it provides and establish whether and how changes in demographics impact upon housing objectives.

Census data from 2021 will need to be considered and incorporated into housing related sub strategies as they are renewed and updated.

#### Maintaining, Monitoring and Understanding Housing Register Data

- 5.3.3 Data from the Housing Register helps to inform mixes of dwellings for new affordable rented housing schemes. It must therefore be collated, monitored and analysed in order for the needs for such accommodation to be understood. Table 15 above shows that there has been a significant increase in the number of applicants requiring larger properties (4 bedrooms and above) from September 2018 to September 2019. In particular this will need to be monitored and reviewed as further data becomes available and the need to provide larger affordable rented houses taken into account when agreeing affordable housing schemes.

The administration of the Housing Register was taken back in house by the Council in April 2018. It should, therefore, be an objective deliverable by the Council without reference to other parties.

#### Improving the monitoring of Shared Ownership Data

- 5.3.4 Robust and detailed data in relation to shared ownership demand in Bedford Borough is not readily available from the Help to Buy Agent. Without this data it is difficult to ensure that the mix of shared ownership dwelling types for new schemes reflects demand.

It is necessary to work with the Help to Buy Agent to access what data is available and, if possible, introduce regular reporting mechanisms. The resultant data should be used to inform the mix of dwellings provided as shared ownership on new housing schemes.



#### Understanding the need for New Forms of Housing Products

- 5.3.5 The NPPF 2019 Glossary contains an updated definition of Affordable Housing. It presents opportunities to deliver new types of Intermediate Tenure to meet the needs of those wishing to access affordable home ownership. The government has indicated an intention to introduce First Homes as one such product.

The NPPF also allows for the provision of private sector housing products new to Bedford Borough – such as Build to Rent.

It will be necessary to establish the need for such housing products through the LHNA and, where need is evidenced, to explore opportunities to deliver them – potentially through pilot schemes. It will also be necessary to assess their impact in due course and, based on the findings of any assessment, establish whether the provision of further such schemes is appropriate.

#### Understanding the local need for Self Build and Custom Build Housing

- 5.3.6 The Council's Self-Build and Custom Housebuilding Register has been established since 2015. The Act and its associated Regulations allow local authorities to divide the register into two parts – one for registrants with a local connection to the Borough and one for those without – and to introduce proportionate charges for registrants to join and remain on the register.

Splitting the Register would enable the Council to better understand the local need for self-build plots and the introduction of a charge would substantiate need as those who commit to paying the charge can reasonably be assumed to have more than a superficial interest in pursuing a self-build project.

It will also assist in developing an evidence base to support the draft policies of the new local Plan that apply to the provision of self build plots.



### Updating the GTAA for the New Local Plan

- 5.3.7 An updated GTAA to evidence the need for pitches for Gypsy and Travellers and Travelling Showpeople for the new Local Plan will need to be commissioned and produced during the lifetime of this Housing Strategy.

### Key Actions

- 5.4 To deliver the Understanding Housing Needs objective the Council will:

- 5.4.1 Commission a LHNA as part of the evidence base for the new Local Plan. Use the findings on needs for:

- Market Housing
- Affordable housing
- Intermediate Tenures – including new forms of intermediate tenure
- Role of the Private Rented Sector including Build to Rent
- Specialist accommodation for older persons and wheelchair users

To inform housing mixes on new development schemes.

- 5.4.2 Consider the findings of the 2021 Census as they emerge and identify what, if any, impact these have on adopted Strategies. Take revised Census data into account when formulating revised strategies during the lifetime of this Housing Strategy.

- 5.4.3 Monitor Housing Register data to establish the demand for affordable and social rented housing in Bedford Borough. Use this data to inform the mix of affordable or social rented housing mixes on new development schemes.
- 5.4.4 Collect available data from the Help to Buy Agent to monitor the demand for shared ownership as an affordable home ownership product. Use this data to inform affordable housing mixes on new development schemes.
- 5.4.5 Investigate other affordable housing home ownership products as proposals come forward and consider whether a pilot scheme is appropriate for them. Assess any pilot scheme(s) undertaken during the period of this strategy and use this information to inform future housing mixes for new schemes.
- 5.4.6 Keep a database of rural housing needs surveys. Use this to inform affordable housing mixes on rural exception schemes.
- 5.4.7 Maintain the Self-Build and Custom Housebuilding Register. Explore the potential to introduce charges for registrants and to split the register between those who have a local connection to the Borough and those who do not. Use data on the register to inform draft policies for Local Plan review.
- 5.4.8 Complete a data cleanse of the Self-Build and Custom Housebuilding Register annually.
- 5.4.9 Commission and produce a new GTAA to evidence the requirements of the draft policies of the new Local Plan.

## 6. Theme 2 – Delivering the Homes Required

### Key Objective

6.1 The key objective in relation to Delivering the Homes Required is:

**To ensure that the objectively assessed need for both market and affordable housing is delivered and to contribute actively to the growth anticipated for our region**

### Data Sources

6.2 The following are the key data sources relating to ‘Delivering the Homes Required’ and what each tells us:

#### Housing Completions

6.2.1 As detailed in section 5.2.1 the SHMA identifies the objectively assessed need for housing for Bedford Borough for the 15-year period 2015 -2030 as an average of 970 dwellings per year of which 279 should be affordable dwellings. Table 17 identifies that on average the total number of new homes delivered has substantially exceeded the target 970 over the 5 years 2014 - 2015 to 2018 - 2019 at 1,151 dwellings. For the last 3 years the average number of total completions was 1,321.



The number of affordable dwelling completions increased by 136 % from 164 dwellings in 2014 - 2015 to 386 in 2018 - 2019. There were a number of reasons for the low point in 2014 - 2015 including the impact of viability appraisals - which reduced the affordable housing provision to below policy compliant levels on some strategic sites - and the early delivery of affordable housing completions on some large sites in the aftermath of the credit crunch in 2008. Analysis of pipeline affordable housing schemes indicates that the affordable housing target of 279 dwellings is likely to be met or exceeded during the next 5 years.

Table 17: Total and Affordable Housing Completions – Bedford Borough 2012 - 2013 to 2018 - 2019

Year	2012 - 2013	2013 - 2014	2014 - 2015	2015 - 2016	2016 - 2017	2017 - 2018	2018 - 2019
Total Housing Completions	654	997	828	964	1255	1350	1359
Affordable Housing Completions	221	247	164	184	205	299	386
Affordable Housing as percentage of total completions %	33.6	25.1	19.3	16.5	16.5	22.1	28.4

Sources: Affordable Housing - MHCLG Live Tables 1008C, Total Completions - Bedford Borough Council Housing Monitoring Reports

Table 18 shows affordable housing completions broken down by tenure.

This data shows that, in addition to the consistent rise in the total number of affordable completions noted above, the number of affordable rented completions has increased consistently and dramatically over the final four years – from 96 completions in 2015 - 2016 to 275 completions in 2018 - 2019 – an increase of 186%. This reflects increased delivery on a number of strategic sites such as South of Fields Road, Wootton, Land North of Bromham Road, Biddenham, Rousbury Road, Stewartby and Wixams Village 2 which all delivered their first affordable housing completions in this period and will continue to deliver new affordable housing during the early years of this Housing Strategy.

A step change in the tenure balance of completions towards affordable rent should take place during the early years of this Housing Strategy as sites allocated under Local Plan 2030 - and other permissions granted – requiring 78% affordable rent and 22 % intermediate tenure to comply with Policy 58S – begin to deliver completions.

Table 18: Affordable Housing Completions by Tenure

Year	Total Dwellings			Percentage	
	Affordable or Social Rent	Intermediate Tenure*	Total	Affordable Rent	Intermediate Tenure
2014 - 2015	104	60	<b>164</b>	63%	37%
2015 - 2016	96	88	<b>184</b>	52%	48%
2016 - 2017	121	84	<b>205</b>	59%	41%
2017 - 2018	164	135	<b>299</b>	55%	45%
2018 - 2019	275	111	<b>386</b>	71%	29%
<b>Total/Average</b>	<b>738</b>	<b>452</b>	<b>1190</b>	<b>62%</b>	<b>38%</b>

\*Intermediate Tenure has been predominantly Shared Ownership during these years.

Source: MHCLG Live tables 1006C, 1006aC, 1006bC, 1007bC and 1007cC )

### Five Year Land Supply

- 6.2.2 The NPPF requires Local Planning Authorities to produce ‘a trajectory illustrating the expected rate of housing delivery over the plan period’ which ‘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’ (NPPF 2019, para 73).

The Housing Delivery Test – introduced in 2019 - is an annual measurement of housing delivery in Local Planning Authorities. It compares the number of homes delivered over three years to the homes that should have been built in that time. Local Authorities who fail the test face a number of sanctions including a requirement to put in place an action plan to address the shortfall and, for those delivering less than 85% of their requirement, a need to apply a 20% buffer to the dwelling numbers required to meet their 5-year land supply.

The Council's Five Year Supply of Deliverable Housing Sites is updated annually.

As at February 2020, the Council passed the Housing Delivery Test with a score of 125% and had a 5.75 year supply of housing sites.

#### Information from Registered Provider Partners

- 6.2.3 The Council does not own its own affordable housing stock and does not develop new affordable housing. The delivery of new affordable housing is undertaken by the Council's Registered Provider partners. The housing strategy team maintain regular contact with Registered Provider partners to obtain up to date information on new affordable housing delivery that allows it to forecast completion numbers and to facilitate delivery by supporting funding applications etc. where it is able.

## Issues for Bedford Borough

- 6.3 The key issues for Bedford Borough in relation to Delivering the Homes Required are:

#### Bringing Forward Sites Allocated in Local Plan 2030

- 6.3.1 Facilitating the delivery of sites allocated in Local Plan 2030 will be a major focus of the 'Delivering the Homes Required' theme during the lifetime of this Housing Strategy. In particular the delivery of a number of urban sites - such as those in the One Public Estate portfolio – will require intensive work including master planning and preparation of Design Briefs and Codes to bring them forward.

The delivery of Local Plan allocated housing sites where there is an affordable housing requirement under planning policy is the most significant route to delivering the Council's affordable housing need. Bringing forward housing sites allocated in the Local Plan is therefore key to increasing the supply of affordable housing for those who need it.

#### Undertaking a Local Plan Review

- 6.3.2 The Council as Local Planning Authority has committed to submit a new Local Plan for examination within three years of the adoption of Local Plan 2030. This means that the draft new Local Plan will be submitted for examination by January 2023. The new Plan will need to identify and allocate sufficient housing sites to meet the need as calculated by the standard method.

It is possible that sites allocated in it will contribute to delivering the homes we need and draft policies be given weight in the determination of planning applications before the end of the period covered by this Housing Strategy. The Housing Strategy team will work closely with the Planning Policy team to assist with the drafting of new policies, the examination process and the adoption of the new Plan.

#### Delivering the Vision for the Arc

- 6.3.3 As detailed in para 3.30 the Government's paper 'The Oxford-Cambridge Arc: Government ambition and joint declaration between Government and local partners' identifies the area between the two cities – including Bedford Borough - as an area of significant growth and economic potential.



It includes an ambition for up to one million new homes - and the social and transport infrastructure necessary to support them - across the Arc by 2050. This includes the completion of East West Rail and the new road Expressway.

In its Budget 2020, the Government announced its intention to examine and develop the case for up to four new Development Corporations in the Arc at Bedford, St Neots / Sandy, Cambourne and Cambridge to accelerate new housing and infrastructure development.

Geographically located at the centre of the Arc, the Council will need to be a key partner in considering the potential for growth and ensure its best interests are represented - including in discussions regarding the potential formation of a new Development Corporation covering the Borough.

#### Building Relationships with Key Delivery Partners - Registered Providers, Homes England and SEMLEP

- 6.3.4 The Council does not own affordable housing stock or deliver new affordable housing itself. It is reliant upon its Registered Provider partners to deliver the new affordable housing needed. It is therefore important for the Council to nurture existing relationships with Registered Provider partners and to work with new partners where they can demonstrate that they have the resources – time, skills and financial – to help to deliver new affordable housing and a commitment to partnership working and service delivery in the Borough.



The nature of those seeking to develop affordable housing is changing. A number of non-traditional Registered Providers – such as ‘for profit’ and specialist intermediate housing providers - are entering the market. The Council will need to monitor this and will work with them where they can demonstrate the same commitment to delivery and service as its traditional Registered Provider partners and / or can show how their specialist affordable housing products meet identified needs.

Homes England and SEMLEP remain key partners in assisting in the delivery and funding of both affordable and market housing and key infrastructure needed to support it. In addition to assisting with a number of strategic housing projects, it is likely that their roles will be key to the planning and delivery of new housing proposed for the Arc. The Council will need to work proactively with them and other Arc local authorities on the development of the vision for the Arc during the lifetime of this Housing Strategy.

#### Evidencing Viability

- 6.3.5 In May 2019, revised Planning Practice Guidance was published setting out key principles in understanding viability in plan making and decision taking for housing sites. Policy 58S of Local Plan 2030 allows applicants to submit evidence justifying proposals where on viability grounds the total number of affordable dwellings or the tenure split are other than policy compliant. A number of allocated urban housing sites have challenges which, if evidenced, may result in less than policy compliant affordable housing provision.

The Council will need to ensure that submitted viability appraisals are thoroughly assessed on its behalf by independent advisors and that affordable housing provision is maximised where non-policy compliant schemes are approved. The council will also commission independent viability advice to be taken into account in the drafting of policies in the new Local Plan.

#### Identifying Schemes Providing in Excess of Policy Compliant Affordable Housing

- 6.3.6 A number of Registered Provider partners are seeking opportunities to deliver ‘self-procured’ housing schemes that, with financial support from Homes England, would deliver affordable housing in excess of that required under planning policy.

These may include re-development of sites in their ownership, purchase of sites for sale on the open market or purchasing of completed properties ‘off the shelf’ from developers.

A number of such schemes – for example the redevelopment of the Brickhill Drive garage site (bpha), Wixams Parcel J (bpha) and Derwent Place (Aldwyck) delivered completions during the period covered by the previous Housing Strategy.

There is the opportunity for the Council to work with affordable housing delivery partners to secure in excess of policy compliant affordable housing on suitable sites to assist in Delivering the Homes We Need.

Sites where Registered Providers are in control of delivery also provide opportunities to build some specialist accommodation – such as supported, wheelchair adapted or larger housing and these opportunities should be explored wherever possible.

Entry level exception schemes were introduced as a potential route to deliver additional affordable housing under para 71 of the National Planning Policy Framework in 2019. Whilst opportunities to exploit this whilst a new Local Plan is being prepared are considered limited, the Council will continue to keep this under review and will assess opportunities to deliver such schemes as they arise.

#### Neighbourhood Plans and Community Led Housing

6.3.7 Neighbourhood Plans can be prepared at a local level by Parish Councils or by community members acting together as a neighbourhood forum. A number of parishes in Bedford Borough have designated Neighbourhood Area status and a number of Neighbourhood Plans are at various stages of the drafting and adoption process. Housing sites allocated in these plans will contribute to meeting the housing needs of the Borough and the Council will need to continue to support the production of Neighbourhood Plans in designated areas.

There may be opportunities to explore proposals for Community Led Housing Schemes. Such schemes would most likely be resource intensive and require a long-term commitment from the Council and would be considered on an ‘opportunity led’ basis in the light of the availability of resources to deliver them.

#### Evidencing Rural Housing needs

6.3.8 Sites in rural areas identified in Local Plan 2030 and Neighbourhood Plans help meet the objectively assessed need identified in the SHMA. The affordable housing they provide is allocated in accordance with the Council’s housing Allocation Scheme. Local Plan 2030 Policy 67 allows for planning permission to be granted as an exception to Policy where there are identified local needs and a number of other requirements are met.

Successful ‘rural exception’ schemes were delivered in Wyboston, Sharnbrook and Carlton during the lifetime of the previous Housing Strategy. Whilst recognising that the delivery of rural exception schemes has challenges and is resource intensive, the Council will seek to build on these successes by working with Parish Councils and other key partners – such as Bedfordshire Rural Communities Charity – to assess and deliver further such schemes where needs are identified.

Some rural exceptions schemes might be brought forward under Community Led Housing initiatives. The Council will need to consider, within available resources, whether and how it is able to support any such initiatives.



Investigate Opportunities to Provide Enhanced Housing Standards

6.3.9 Improving Space Standards:

In 2015, the Government introduced Technical Housing Standards which allow optional requirements for the gross internal area of new homes taking into account the likely number of occupants. Paragraph 10.35 of Local Plan 2030 states 'The suitability of a dwelling in providing the space needed...is an important matter in seeking to ensure a high quality dwelling stock but the Council has not identified a particular need for the national standard to become a policy requirement in Bedford Borough'.

In 2013 Permitted Development Rights were introduced that allowed the conversion of vacant office accommodation to residential dwellings. When permitted development rights are used in this way the Council as Local Planning Authority has limited powers to influence the design and space standards of dwellings produced. In Bedford Borough 649 dwellings were completed as a result of permitted development rights office conversions between April 2013 and March 2019. Local Plan Policies cannot prevent Permitted Development Rights from being implemented. The impact of permitted development office conversions on the quality of housing built is not limited to Bedford Borough and the media have highlighted a number of high profile cases in other areas where design and space standards have been felt to be inappropriate.

These cases may result in a change to the national planning context in relation to permitted development rights and space standards and if so the new Local Plan will need to consider how to take account of these.

Notwithstanding these issues, change of use from office accommodation or retail has the potential to assist in meeting housing needs. This potential may be increased in the post Covid 19 operating environment. Whilst using all available influence to ensure highest possible design standard are met, the Council will explore these opportunities as they arise.

Where planning permission is required, Policy 2S of Local Plan 2030 requires measures that promote health, safety and active living for all age groups and that Health Impact Assessments be submitted on qualifying sites. This may present opportunities to consider how housing design and layout impact on health in a broader development context.

6.3.10 Delivering Housing with Enhanced Environmental Standards:

In March 2019, the Council declared a Climate Emergency. A Climate Change Committee, chaired by the Mayor, has been formed to reduce the Council's own carbon emissions by implementing projects and policies and encourage the residents and businesses of the Borough to reduce their carbon emissions so Bedford Borough is seen as the place to grow and has a good quality local Environment'.

This commitment is reflected in the Vision of the Council's Carbon Reduction Delivery Strategy which is 'by 2030, the Council's own operations will be clean and efficient, and we will play a positive role enabling the wider borough to achieve net-zero emissions'

In March 2018 the first affordable housing Passivhaus scheme in the borough was completed by Hastoe Housing Group at Mill Road, Sharnbrook. Other Registered Provider partners have indicated their intention to deliver additional sustainable housing. Sustainability and environmental standards of new housing will be a focus of Delivering the Homes We Need and the drafting of any new Local Plan policies across all tenures.

The Council will need to consider how to support and facilitate opportunities to provide enhanced space or environmental standards on housing schemes.

#### 6.3.11 Delivering sites suitable for Custom and Self Build Housing

During the lifetime of this strategy, the Council will need to continue to meet its statutory obligations under the Self-build and Custom Housebuilding Act 2015, The Housing and Planning Act 2016 and The Self-build and Custom Housebuilding Regulations 2016 to meet identified needs for self-build plots. To evidence the level of demand the Council will need to consider whether to divide the Register and / or introduce fees for registrants. The results of this exercise will assist in drafting self-build policies for the new Local Plan.

#### 6.3.12 Delivering Pitches to Meet the Identified Need for Gypsy and Traveller and Plots for Travelling Showpeople

Sites to meet the GTAA evidenced needs of Gypsy and Travellers and Travelling Showpeople must be identified and delivered within the timescales identified in the GTAA.

#### 6.3.13 Specialist Accommodation

Issues in relation to providing specialist accommodation - including accommodation to meet the needs of Homeless Households - is considered further in Theme 4 - meeting the Needs of Vulnerable People.

### Key Actions

6.4 To deliver the 'Delivering the Homes Required' objective the Council will:

6.4.1 Work with developers and landowners to deliver the housing sites allocated in Local Plan 2030, across all tenures.

6.4.2 Identify housing sites and to prepare housing policies for the new Local Plan and assist in processes leading to its adoption.

6.4.3 Ensure that the Council is a key player in the development of the Oxford - Cambridge Arc.

- 6.4.4 Ensure that wherever possible all proposals deliver policy compliant levels of affordable housing. Less than policy compliant levels will only be accepted following rigorous external verification and challenge on behalf of the Council.
- 6.4.5 Build upon established relationships with Registered Provider partners and those new to Bedford Borough where they have the capacity, skills and commitment to assist with meeting affordable housing needs.
- 6.4.6 Nurture relationships with funding organisations such as Homes England and SEMLEP to ensure that opportunities to fund affordable housing and key infrastructure projects are maximised.
- 6.4.7 Utilise Policy 59S of the Local Plan 2030 to identify sites where supported housing can be provided to meet identified needs.
- 6.4.8 Work with One Public Estate and other partners, landowners and developers to deliver key urban sites, including the preparation of development briefs where required. Ensuring that affordable housing is maximised where viability issues are identified.
- 6.4.9 Commission and secure independent viability evidence to support the development of policies contained in the new Local Plan.
- 6.4.10 Support Neighbourhood Plan groups to prepare, deliver and update their plans.
- 6.4.11 Work with Parish Councils, Registered Providers and other partners to bring forward rural exception schemes where a need has been identified.
- 6.4.12 Proactively work with affordable housing partners to identify and bring forward sites where affordable housing in excess of policy compliant levels can be delivered. Consider the use of these sites to deliver supported housing or adapted housing where appropriate.
- 6.4.13 Assess the potential for new local plan policies to improve the quality of development as part of the new local plan. Support and encourage Registered Provider partners' proposals to deliver affordable housing with higher environmental standards than those required by building regulations.
- 6.4.14 Consider how the disposal of the Council's own assets might assist in meeting identified demand for plots suitable for self-build and with planning applicants and neighbourhood planning groups to ensure opportunities to meet identified needs are maximised through the planning process.
- 6.4.15 Ensure opportunities to meet identified need for self-build plots is considered in the drafting of the new Local Plan.
- 6.4.16 Identify sites that deliver the GTAA 2017 needs for pitches for Gypsies and Travellers and plots for Travelling Showpeople. Manage these sites forward such that they are delivered within the identified timeframes.

## 7. Theme 3 - Making Best Use of Existing Housing

### Key Objectives

7.1 The key objectives in relation to Making Best Use of Existing Housing are:

***Make better use of our existing homes in the Borough including bringing empty properties back into use and addressing climate change and fuel poverty issues.***

***Ensure that as much as possible of the affordable housing stock is fully occupied and where adaptations have been carried out they are available to those that need them.***

***Develop a robust approach to allocations and tenancies of affordable housing that meets the needs and priorities of the Borough and maximise the use of available resources.***

### Data Sources

7.2 The following are the key data sources relating to 'Making Best Use of Existing Housing' and what each tells us:

#### Condition of Private Housing – Building Research Establishment Report

7.2.1 In 2018, Bedford Borough Council commissioned the Building Research Establishment (BRE) to undertake a series of modelling exercises on the Borough's private sector housing stock which required BRE to produce an integrated stock model. The report details the results obtained from the integrated model and Housing Stock Condition Database.

The key findings of this report are:

- 59.7% of properties in Bedford Borough are owner occupied, 23.3% are in the private rented sector and 17% are social housing.
- 14% of dwellings in the private sector and 16% of properties in the private rented sector may have category 1 Housing Health and Safety System (HHSRS) hazards.
- 6.7% of private sector dwellings and 6.9% of private rented dwellings in Bedford Borough are estimated to have an Energy Performance Certificate rating below band E. This compares to 19% nationally.
- In the private sector stock, there are an estimated 12,662 dwellings with uninsulated cavity walls and 9,265 dwellings with less than 100mm of loft insulation.
- The highest concentrations of low income households in Bedford Borough are found in the urban wards of Cauldwell, Kingsbrook and Queens Park.

### Fuel Poverty

7.2.2 Households are considered to be fuel poor if:

- They have required fuel costs that are above national average level and
- Were they to spend that amount, they would be left with a residual income below the poverty line.



Table 19 shows fuel data figures for Bedford Borough for the four years 2015 - 2018 inclusive which are published two years in arrears:

Table 19: Fuel Poverty in Bedford Borough 2015 - 2018

Year Published	Data Year	Number of households	Number of households in fuel poverty	Proportion of households fuel poor (%)
2017	2015	65,930	5,582	8.5%
2018	2016	67,031	6,763	10.1%
2019	2017	67,613	7,495	11.1%
2020	2018	68,164	6,900	10.1%

Source: ONS - Sub-regional fuel poverty data

### Empty Properties

7.2.3 A long-term empty home is a residential property that has been left unoccupied for six months or more.

Table 20 shows the number of empty homes in Bedford Borough by how long they have been vacant - annually since the start of the Council's Accelerated Empty Homes Programme in August 2014 to August 2019. The final column shows the percentage change from August 2014 to August 2019.

The data indicates that the Council has made significant progress in bringing very long-term empty properties (those 5 years empty and above) back into use during this period. The number of properties empty for 1 - 2 years has shown a significant increase.

This reflects a downturn in the housing market with owners indicating that they are attempting unsuccessfully to sell or have had multiple sales fall through.

Table 20: Number of Empty Homes Annually to August 2018 and by Quarter Thereafter

	Aug 2014	Aug 2015	Aug 2016	Aug 2017	Aug 2018	Aug 2019	% Fall (Rise)
1-2 Years	281	239	215	No data	315	352	<b>(25.3%)</b>
2-5 Years	174	147	142	No data	171	171	<b>1.7%</b>
5-10 Years	81	68	61	No data	54	55	<b>32.1%</b>
10+ Years	62	56	119	No data	43	41	<b>33.9%</b>
<b>Total 5+ Years</b>	<b>143</b>	<b>124</b>	<b>119</b>	<b>No data</b>	<b>97</b>	<b>96</b>	<b>32.9%</b>
<b>Total</b>	<b>598</b>	<b>510</b>	<b>476</b>	<b>No data</b>	<b>583</b>	<b>619</b>	<b>(3.5%)</b>

Source: Council Tax data

Detailed analysis of further empty homes data is reported to the Council's Housing Committee on a regular basis. Copies of Housing Committee reports are available here:

<https://www.councillorsupport.bedford.gov.uk/ieListMeetings.aspx?CIId=594&Year=0>

### Houses in Multiple Occupation

7.2.4 Houses in Multiple Occupation (HMO) can provide accommodation for single person households who are unable to afford self-contained housing and for those whose need is for a shorter term tenancy than those provided by the self-contained private rented market. HMOs can, therefore, assist in making best use of existing stock from a housing needs perspective.

Table 21 shows the estimated number of Mandatory licensable HMOs in Bedford Borough from 2014 - 2015 to 2018 - 2019.

Table 21: Estimated Number of Mandatory Licensable HMOs in Bedford Borough 2014 - 2019

	2014 - 2015	2015 - 2016	2016 - 2017	2017 - 2018	2018 - 2019
Estimated total number of HMOs	906	915	886	858	697
Number of properties with Mandatory HMO licences issued	78	81	94	115	283*

\*At March 2019 the Council was in the process of issuing new Mandatory Licences to those properties that had been brought into the definition of a Mandatory HMO following the changes to the legislation brought in in 2018.

SOURCE: Local Authority Housing Statistics Returns

### Disabled Facilities Grants

7.2.5 Disabled Facilities Grants (DFG) are provided by local authorities to make physical adaptations to properties in order to make them suitable for those with disabilities.

Examples of adaptations include: widening doors, levelling thresholds and installing ramps, providing or improving access to bedrooms or washing facilities, installing stair lifts and improving or providing heating systems that are suitable for a person with a disability.

They assist in making best use of existing stock by allowing those who need adaptations to remain in their home, reducing the need for additional adapted dwellings.

Table 22 shows the number of DFG applications received, applications approved and jobs completed in Bedford Borough from April 2014 to March 2019. This emphasises the continued need and demand for DFG in Bedford Borough.

Table 22: DFG Applications Received, Applications Approved and Jobs Completed – Bedford Borough

	2014 - 2015	2015 - 2016	2016 - 2017	2017 - 2018	2018 - 2019
Total number of DFG applications received*	423	471	422	246	181
Total number of DFG applications approved	121	130	204	183	135
Percentage of DFG applications approved	28.6%	27.6%	48.3%	74.4%	74.6
Total number of DFG jobs completed	89	108	134	144	165

\*Figures for applications prior to 2017 - 2018 include applications and inquiries for types of grant other than DFGs.

SOURCE: Bedford Borough Council Home Improvement Team

In October 2019 the Council implemented a new information technology based case management system (HIACM) which permits a greater interrogation of available data on such matters as the type of adaptation required, costs of works, waiting times etc.

#### Tenancy Strategy Data

- 7.2.6 The Council's Tenancy Strategy 2018 - 2023 recommends that Registered Providers of affordable housing offer fixed term tenancies (FTTs) for affordable rented properties that have three bedrooms or more or that have specialist facilities for those with disabilities. The objective is that the accommodation should be recovered at the end of the fixed term if the tenant no longer requires a property of that size or the adaptations it contains – and alternative accommodation identified for the tenant for which they do qualify.

The Tenancy Strategy states (para 2.16) that the impact of Assured Shorthold FTTs should be reviewed annually to gain a better understanding of how the introduction of FTTs has affected tenants, how RPs have responded to the Council's Tenancy Strategy and establish what further work might be required in the future.

In September 2019, the first review of FTTs was completed. It was found that a small number of RPs in Bedford Borough are using FTTs but this includes bpha who have the largest stockholding in the Borough with over 70% of the rented social housing stock. It was also found that drawing conclusions from the data was premature as there were only a limited number of FTTs that have come to an end at that point in time.

A full copy of the Review and its data is available here:

<https://www.bedford.gov.uk/housing/housing-strategies-and-policies/housing-development-and-policy/>

#### Affordable Housing Lettings data

- 7.2.7 Data evidences that the re-letting of existing stock makes a significant contribution to meeting the need for affordable or social rented accommodation. Table 23 shows the total social and affordable lettings by year from 2014 - 2015 to 2018 - 2019. Table 24 shows the total number of new build affordable and social rented completions taken from para 6.2.1 and as a percentage of the number of lettings. Although the data is not strictly comparable (dwellings may be let in the year after they complete, if they complete late in the financial year) it illustrates the importance of making best use of existing affordable rented accommodation that comes up for re-let to the meeting of affordable housing needs.

Table 23: Total Affordable and Social Rented Lettings

Tenancy Type	2014 - 2015	2015 - 2016	2016 - 2017	2017 - 2018	2018 - 2019
Social Rented Lettings	594	588	481	544	602
Affordable Rented Lettings	92	169	133	190	187
<b>Total Lettings</b>	<b>686</b>	<b>757</b>	<b>614</b>	<b>734</b>	<b>789</b>

Source: core statistics

Table 24: Total New Build and Total Re-lets as a percentage of Total Affordable and Social Rented Completion

	2014 - 2015	2015 - 2016	2016 - 2017	2017 - 2018	2018 - 2019
Affordable and Social Rented Completions	104	96	121	164	275
New build completions as percentage of total lettings	15%	13%	20%	22%	35%
Re-lets as percentage of total lettings	85%	87%	80%	78%	65%

Source: core statistics

## Issues for Bedford Borough

### 7.3 The key issues for Bedford Borough in relation to Making Best Use of Existing Housing are:

#### 7.3.1 Understanding the Private Housing Stock

The BRE report produced in 2018 currently fulfils the Council's obligation to understand its private sector housing stock however, this expires in 2023. During the lifetime of this Housing Strategy, options for the updating of this information will need to be considered and implemented.

#### 7.3.2 Identifying Measures to Increase Energy Efficiency

The BRE Report identifies that there are an estimated 12,662 dwellings with uninsulated cavity walls and 9,265 dwellings with less than 100mm of loft insulation in the private sector. Although these properties are scattered throughout the Borough there is a concentration of them in the urban area of Bedford.

Over the four years to 2018 the percentage of households in fuel poverty in Bedford Borough ranged from 8.5 to 11.1%. With an average of almost 10% of households in fuel poverty over this period, this is an issue that requires addressing.

Schemes such as LA Flex - funded by the energy companies under the Energy Company Obligation 3 - may provide an opportunity for the Council to help those that do not otherwise meet the qualifying criteria for affordable warmth assistance - but nonetheless are on low incomes or at risk of fuel poverty - to access assistance to improve the energy efficiency of their homes. There is the potential for the Borough to work collaboratively with other local authorities to introduce such schemes which will also help reduce energy use and contribute to achieving the objectives of the Council's Climate Change agenda. Potential schemes require investigation and, if appropriate, implementation.

Under the Energy Efficiency (Private Rented Property) (England and Wales) Regulations 2015 in April 2020 the Council became responsible for monitoring the Minimum Energy Efficiency Standards (MEES) for rented accommodation. From that date there was a requirement for properties in the private rented sector to have a minimum energy performance EPC rating of E.

The Council has established a multi-agency Fuel Poverty Steering Group to lead on the development and implementation of a work plan to tackle fuel poverty in the Borough. Membership includes: Citizens Advice, carers and mental health organisations, Age UK, bpha, and representatives from Bedfordshire Clinical Commissioning Group. This group was established in early 2020 and its work plan will need to be drafted, agreed and its implementation monitored during the lifetime of this Housing Strategy.

### 7.3.3 Minimising the Number of Empty Properties

A dwelling that is left empty is a wasted resource, both for the person who owns it and those looking for somewhere to live. If left vacant for a long period of time the physical condition of a property can start to deteriorate and the property might become a nuisance for those living in the neighbourhood.

The Council's adopted Empty Homes Strategy 2019 - 2024 details the measures it takes to bring long-term empty properties back into use. Where owners fail repeatedly to act to bring a property back into use the Council will consider compulsory purchase action. In doing so, the overriding objective is to increase the amount of decent housing available to those who need it. Reducing the number of empty homes will continue to be a priority for the Council.

The Council's Empty Homes Strategy expires in 2024 and it will need to be considered and renewed.



#### 7.3.4 Impact of Houses in Multiple Occupation

In addition to the Mandatory licensing of properties with 5 or more bedspaces introduced by the government in 2018, Bedford Borough Council operates an Additional HMO Licensing scheme for smaller HMOs (with three or four unrelated tenants sharing one or more amenities) and converted buildings. This additional scheme commenced in 2018 and applies until 16 May 2023. The scheme will need to be reviewed and a decision taken to extend, amend or end it on that date.

In recent years, some urban areas have seen an increase in the concentration of HMOs. Concerns have been expressed that this has resulted in increased levels of anti-social behavior and a decline in visual amenity. In addition, a potential impact on the stability of local communities has been perceived as potential owner occupiers compete with buy-to-let landlords for properties increasing property prices beyond the pocket of those who would wish to purchase property to live in longer term themselves.

Following public consultation, in November 2019 the Council issued a non- immediate Article 4 Direction giving notice of the Council's intention to remove Permitted Development Rights to use properties as HMOs for up to six people without the need for planning permission. This order – which covers Bedford and Kempston – will take effect in November 2020 subject to confirmation.

Thereafter, owners wishing to use properties in the area as small HMOs (i.e. for fewer than six people) must obtain planning permission before they are able to do so. The need for planning permission to develop large HMOs (i.e. for six people or more) remains unchanged.

#### 7.3.5 Ensuring Best Use is Made of Disabled Facilities Grants

A Housing Assistance Policy was adopted by the Council in January 2020 which:

- Created a Home Improvement Agency, enabling the Council to fully manage the grant on behalf of the applicant.
- Enhanced Disabled Facilities Grant, extending the current scope to include assistance for palliative care patients and a loan scheme for removable items such as stair lifts.
- Introduced a Discretionary Disabled Facilities Assistance Grant, aimed at “topping up” mandatory grants.
- Established a Hospital Readmission Prevention Grant, to fund adaptations or repair works that are necessary to prevent a potential hospital admission or readmission.

The effectiveness of this Policy will need to be monitored and the policy reviewed in the light of the issues identified.

The newly implemented HIACM system will provide additional DFG data. This will need to be collected and analysed and appropriate action taken on whatever issues are identified.



7.3.6 Reviewing the Impact of and Renewing the Tenancy Strategy

Generating vacancies in existing affordable rented housing stock – where the household no longer needs the size of or specialist accommodation occupied – is a focus of the Tenancy Strategy. The Tenancy Strategy expires during the lifetime of this Housing Strategy and will require renewing.

7.3.7 Review the Council’s Affordable Housing Allocation Scheme

The Allocation Scheme will require regular review to ensure that the eligibility and prioritisation criteria it contains assist in making best use of the available affordable rented housing.

7.3.8 Working with Registered Providers on Incentive to Move Schemes

Some Registered Provider Partners operate schemes that provide incentives for tenants who are under-occupying properties to move to smaller ones, releasing their previous properties for those who need them. The Council does not have affordable housing stock of its own and to make best use of that owned by Registered Provider Partners it will need to encourage and facilitate such schemes. Data in relation to under-occupancy and overcrowding in the affordable housing sector is not publically available. It may be possible to obtain it from Registered Providers.

7.3.9 Redevelopment of Obsolete Housing Stock

In some circumstances, existing housing stock may have come to the end of its useful life and redevelopment might be the most appropriate option. In recent years Registered Provider partners have, for example, redeveloped some sheltered housing schemes that were no longer fit for purpose, replacing them with more suitable accommodation. Where landowners have identified issues the Council will work with them to assess these opportunities and facilitate implementation where appropriate.



## Key Actions

- 7.4 To deliver the Making Best Use of Existing Housing objectives the Council will:
- 7.4.1 Investigate options for updating the Council's data in relation to Private Sector Housing when the period covered by the BRE report expires in 2023 and implement the chosen option.
  - 7.4.2 Agree, implement and monitor the work plan produced by the Fuel Poverty Steering Group, including investigation and implementation of appropriate energy efficiency schemes.
  - 7.4.3 Investigate and if appropriate implement the LA Flex scheme, working collaboratively with other local authorities where this could add value.
  - 7.4.4 Implement the Council's Empty Homes Strategy 2019 - 2024. Review and renew the Empty Homes Strategy as it expires.
  - 7.4.5 Consider the future of the HMO Additional Licensing Scheme and implement the chosen course of action.
  - 7.4.6 If confirmed in November 2020, monitor the impact of the Article 4 direction in relation to HMOs on the number of new HMOs being delivered and how that might impact on meeting housing need.
  - 7.4.7 Implement and monitor the success of the Housing Assistance Policy adopted in 2020. Review and update this Policy as appropriate.
  - 7.4.8 Obtain, maintain, analyse and review the DFG data available from the HIACM system. Use this data to inform decisions in relation to DFG funding.
  - 7.4.9 Review the Council's Allocation Scheme regularly to ensure best use is made of affordable housing available for letting.
  - 7.4.10 Work with Registered Providers to establish and implement schemes that help address issues of under occupancy of affordable rented housing. Undertake research to obtain from Registered Provider partners data on under occupancy and overcrowding in their stock.
  - 7.4.11 Review what funding initiatives are available to improve energy efficiency of properties, investigate these and, if appropriate, implement them.
  - 7.4.12 Review and update the Council's Tenancy Strategy 2019 - 2024 as it expires.

## 8. Theme 4 – Meeting the Housing Needs of Vulnerable People

### Key Objective

- 8.1 The key objective in relation to Meeting the Housing Needs of Vulnerable People is:

***To maximise the supply of specialist housing available to meet the identified needs of vulnerable groups including homeless households, those with a learning disability, mental health issue or physical disability, vulnerable older persons or those with specialist support needs such as those fleeing domestic violence.***

*The Governments ‘No Secrets’ definition of a vulnerable person is one ‘who is or may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation’. Members of other groups that meet this definition may also require specialist housing provision.*

### Data Sources

- 8.2 The following are the key data sources relating to ‘Meeting the Needs of Vulnerable People’ and what each tells us:

#### Care and Support Accommodation Strategies

- 8.2.1 The Council has developed a number of strategies that focus on the delivery of meeting the needs of vulnerable people. In line with Figure 2 these sit underneath the Housing Strategy and support the delivery of its key objectives. These are the:

- Learning Disabilities Accommodation Strategy 2017 - 2022
- Mental Health Accommodation Strategy 2018 - 2023
- Older persons Accommodation Strategy 2018 - 2023

A Physical Disabilities Accommodation Strategy is currently in draft.

Together these form the overarching Care and Support Accommodation Strategy.

In 2020 the Council is undertaking a Homelessness and Rough Sleeping Review which will be used to inform a new Homelessness and Rough Sleeping Strategy 2022 - 2027 which will be drafted, consulted upon and adopted during the lifetime of this Housing Strategy.

Each of these specialist strategies contains extensive data on their individual specialist subjects. This is not reproduced here to prevent repetition and to ensure latest data is available as these strategies are written or updated. They are available here:

<https://www.bedford.gov.uk/housing/housing-strategies-and-policies/housing-development-and-policy/>

#### Homelessness Households including Rough Sleepers

8.2.2 Table 24 shows the number of statutory homelessness decisions 2012 - 2019 by category as determined.

The number of Homelessness Decisions has fallen from a high of 439 in 2016 - 2017 to 326 in 2018 - 2019, a decrease of 25.7%. There has been a reduction of 32.1% in the number of those found intentionally homeless from a high of 53 in 2015 - 2016 and a low of 17 in 2018 - 2019 a decrease of 67.9%. These reductions reflect the focus on homelessness prevention required under the Homelessness Reduction Act 2017.

Table 24: Statutory Homelessness Decisions 2012 - 2019

Year	2012 - 2013	2013 - 2014	2014 - 2015	2015 - 2016	2016 - 2017	2017 - 2018	2018 - 2019
Eligible Unintentional Priority Need	242	174	164	287	252	224	195
Eligible Homeless Priority Need but Intentionally Homeless	31	32	40	53	39	45	17
Eligible Homeless but Not Priority Need	15	27	37	50	36	24	3
Eligible but Not Homeless	64	51	121	130	106	86	98
Ineligible	1	2	4	N/A	6	2	13
<b>Total</b>	<b>353</b>	<b>286</b>	<b>366</b>	<b>N/A</b>	<b>439</b>	<b>378</b>	<b>326</b>

Source: MHCLG Statutory Homelessness Statistics

Table 25 shows the Government's estimate of the number of persons sleeping rough in Bedford Borough between 2012 and 2019. From a high of 76 in 2017 the estimate has reduced to 30 in 2019 – a reduction of 60.5%.

The significant and successful measures undertaken to secure this reduction in the number of those estimated as sleeping rough will be the subject of the Homelessness and Rough Sleeping Review being undertaken in 2019 - 2020. Measures to build on these successes will be included in the Action Plan of the new Homelessness and Rough Sleeping Strategy 2022 - 2027.

Table 25: Estimate of the Number of Persons Sleeping Rough – Bedford Borough 2012 - 2019

Year	2012	2013	2014	2015	2016	2017	2018	2019
Rough Sleeper Estimate	19	26	25	51	59	76	51	30
% Change from previous year	12	37	-4	104	16	29	-33	-41

Source: MHCLG Rough Sleeping Snapshot in England 2019

Further analysis of homelessness statistics for the Borough can be found in the Council’s Homelessness Strategy 2016 - 2021.

## Issues for Bedford Borough

8.3 The key issues for Bedford Borough in relation to Meeting the Needs of Vulnerable People are:

### 8.3.1 Implementing and Renewing the Care and Support Accommodation Strategies

The various accommodation strategies for vulnerable people will expire during the period covered by this Housing Strategy and will require renewing and / or replacing as they do so. The Action Plans for each of the strategies require monitoring and implementing to ensure the needs of the specific groups are met.

### 8.3.2 Identifying and Meeting the needs of other vulnerable groups

There are some vulnerable groups that are not specifically covered by the four Care and Support Accommodation strategies – for example those fleeing domestic violence. The Council’s Housing Strategy team work with the Council’s Adults, Commissioning and Supported Housing teams to identify these groups and agree actions to ensure their housing needs are met. This work will need to be updated and progressed during the lifetime of this Strategy.

### 8.3.3 The identification of sites suitable to deliver housing schemes

Identifying sites suitable for supported housing schemes can be challenging. As detailed in the Care and Support Accommodation Strategies access to facilities is important for vulnerable client groups. Required schemes are often small scale – 6 – 10 flats, for example – and sites of this size that are viable and within the control of a Registered Provider partner can be challenging to identify.

The Council has successfully worked with bpha to redevelop under used garage sites for supported housing. A scheme in Brickhill, Bedford delivered 11 flats for those with mental health issues during the period covered by the Housing Strategy Review 2016 - 2020. Bpha has a programme of reviewing its garage sites and the Council has the opportunity to work with them to identify where these might help deliver supported housing or fully adapted mobility housing for those with a physical disability.

In some cases the Council has land adjoining Registered Provider owned sites and partnership working could assist in creating opportunities to meet supported housing needs. Where the Council owns housing land that has an affordable housing requirement under planning policy this could be considered to provide supported housing.

Policy 59S of Local Plan 2030 identifies circumstances in which specialist housing might be required as part of a planning permission and the Council will apply it to ensure that housing for vulnerable groups is provided on qualifying sites. During the lifetime of this Housing Strategy a new Local Plan will be prepared and submitted for examination. If necessary, the Housing Strategy team will contribute to the drafting of any new specialist housing policies that facilitate opportunities to deliver identified supported housing needs through the planning system.

### 8.3.4 Ensuring the Availability of both Capital and Revenue Funding for New Supported Housing Schemes

In capital terms supported housing schemes are often disproportionality more expensive to procure as they can be small – with no access to economies of scale – or require additional communal areas and / or an enhanced specification which adds additional costs. The Council will need to work with its Registered Provider partners and Homes England to maximise grant income and consider the use of affordable housing commuted sums to help deliver viable schemes where available.

Supported housing schemes also require revenue funding to be identified and allocated in advance of their delivery to ensure the resources necessary to run them are in place when needed. Council's procurement teams will need to continue to work closely with Adults Services, the Housing Strategy Team and providers of supported housing to ensure funds and services for new schemes are provided efficiently.



8.3.5 Ensuring the Processes for Nominating Occupiers of Supported Housing are Efficient

Ensuring processes for nominating occupiers are efficient and therefore maximising the occupancy of property is a priority for meeting housing needs and is important for Registered Provider partners who are reliant upon rental income to fund the cost of providing new housing schemes. To give them the confidence to invest in new projects the Council will need to ensure that nomination and allocation processes work efficiently.

8.3.6 Facilitating the Delivery of Supported Housing on Wixams Village 3

The delivery of the final 'village' of Wixams – a new settlement of 4,500 dwellings crossing the boundaries of Bedford Borough and Central Bedfordshire - will take place during the period covered by this Housing Strategy. A retirement village has been delivered at The Causeway and a scheme for those with learning disabilities is in early planning stages on a site at North End Farm. Both of these sites adjoin the Wixams settlement boundary but are not part of it and are contained entirely within Bedford Borough.

It was considered appropriate to deliver supported housing in the settlement itself in its later stages to ensure that all the necessary facilities were in place to provide for vulnerable client groups. The S106 for Wixams provides for affordable housing nominations to be split between the local authorities on a 50:50 basis.

The Council will therefore need to work with Central Bedfordshire Council to identify supported housing needs and then together work with the developer to secure their delivery.

8.3.7 Conducting the Homelessness & Rough Sleeping Review and Renewing the Homelessness Strategy

The Council's current Homelessness Strategy expires in 2021. The Council is required to undertake a Homelessness Review prior to the production and adoption of a new Homelessness and Rough Sleeping Strategy including building upon the significant successes in reducing the numbers of those estimated as sleeping rough over the past 3 years. These documents will be produced in the early period of this Housing Strategy and their associated Actions Plans will require implementation and monitoring.

## Key Actions

8.4 To deliver the 'Meeting the Housing Needs of Vulnerable People' objective the Council will:

- 8.4.1 Manage the production and adoption of the Physical Disabilities Accommodation Strategy 2020 - 2025.
- 8.4.2 Implement the Action Plans associated with all Care and Support Accommodation Strategies.
- 8.4.3 Renew each of the Care & Support Accommodation Strategies as they expire.
- 8.4.4 Complete the Homelessness and Rough Sleeping Review. Based upon that Review, write and secure the adoption of the Homelessness and Rough Sleeping Strategy 2022 - 2027.
- 8.4.5 Implement the Action Plan associated with the Homelessness and Rough Sleeping Strategy 2022 - 2027.
- 8.4.6 Identify vulnerable groups other than those covered by the Care and Support Accommodation Strategies and their accommodation needs. Where needs are identified, work with Registered Providers and other partners to bring forward schemes to meet those needs.
- 8.4.7 Utilise Policy 59S of Local Plan 2030 to support the provision of supported housing schemes on qualifying sites.
- 8.4.8 Work with Registered Provider partners to identify sites within their control that might deliver supported housing schemes.

8.4.9 If necessary, draft policies for the new Local Plan to ensure they support the provision of supported housing where needs are identified.

8.4.10 Review the success of new supported housing schemes and where appropriate share learning opportunities or form plans to address any issues identified.

8.4.11 Work with Central Bedfordshire Council and the landowner / developer to deliver supported housing provision at Wixams Village 3.



## 9. Action Plan

This Action Plan will be reviewed and updated annually in the light of progress made and resources available

Action	Timescale for Completion of Performance Measure	Priority	Performance Measure	Resources	Responsible Team
<b>Theme 1 – Understanding Housing Needs</b>					
1.1	Commission a LHNA as part of the evidence base for Local Plan.	March 2021	High	SHMA Report commissioned, analysed and published.	Staff time Planning Policy Housing Strategy
1.2	Consider the findings of the 2021 Census as they emerge and identify what impact, if any, they have on adopted Strategies.	2022 - 2023 As findings are published	Medium	Census findings considered and implications for Housing Strategy identified. Action Plans updated if analysis of Census data dictates.	Staff time Housing Strategy
1.3	Take revised Census data into account when formulating updated housing sub strategies during the lifetime of this Housing Strategy	2026 As findings are published and sub strategies updated	High	New or updated housing sub strategies take account of 2021 Census data.	Staff time Housing Strategy
1.4	Monitor Housing Register data to enhance the Council's intelligence about the demand for affordable and social rented housing in Bedford Borough.  Use this data to inform the mix of affordable or social rented housing mixes on new development schemes.	Ongoing Quarterly  Ongoing as affordable housing mixes are needed	High	Housing Register statistics obtained, analysed and used to inform affordable housing mixes on new development sites.  Up to date data collected and used to inform affordable rented mixes on affordable housing schemes	Staff time Housing Services Housing Strategy
1.5	Collect available data from the Help to Buy Agent to monitor the demand for shared ownership as an affordable home ownership product.  Use this data to inform affordable housing mixes on new development schemes.	October 2021  Ongoing	Medium	Nature of data collection and methodology for collecting it agreed  Up to date data collected and used to inform shared ownership mixes on affordable housing schemes.	Staff time Housing Strategy

Action	Timescale for Completion of Performance Measure	Priority	Performance Measure	Resources	Responsible Team
1.6 Investigate other affordable housing home ownership products as proposals come forward and consider whether a pilot scheme is appropriate for them. Assess any pilot scheme(s) undertaken during the period of this strategy and use this information to inform future housing mixes for new schemes.	Ongoing  As Pilot schemes complete	Medium	Affordable home ownership products assessed as they come forward.  Pilot schemes assessed and learning applied to drafting of revised strategies and / or the formulation of mixes of tenure types on new schemes.	Staff time	Housing Strategy
1.7 Keep a database of rural housing needs surveys.  Use this to inform affordable housing mixes on rural exception schemes.	Ongoing Updated Quarterly  As rural exception schemes are identified	Medium	Data base established, maintained and up to date  Surveys used to inform mixes on rural exception schemes as they come forward.	Staff time	Housing Strategy
1.8 Maintain the Self-Build and Custom Housebuilding Register.	Ongoing Annual Published Government Return Dates	High	Register maintained – new applicants added on and applicants requesting to be removed, taken off the register.  Changes to requirements of the Regulations relating to Self-Build applied.  Annual Returns to Government completed accurately and on time.	Staff time	Housing Strategy Planning Policy Development Management
1.9 Explore the potential to introduce charges for Self-Build registrants and to split the Self-Build Register between those who have a local connection to the Borough and those who do not.	2020	High	Decision made whether to introduce charges or not and whether to split the Self-Build Register between those who have a local connection and those who do not.	Staff time	Housing Strategy
1.10 Use data on the Self-Build Register to inform draft policies for Local Plan review.	December 2023	High	New Local Plan informed by self-build and custom build data collected for the register. Plan examined and adopted.	Staff time	Housing Strategy Planning Policy
1.11 Complete a data cleanse of the Self-Build and Custom Housebuilding Register annually.	September Annually	Medium	Annual data cleanse completed.	Staff time	Housing Strategy
1.12 Commission and produce a new GTAA to evidence the housing requirements for Gypsy and Travellers and Travelling Showpeople for the new Local Plan.	March 2021	High	GTAA commissioned and published.	Staff time	Housing Strategy Planning Policy

Action	Timescale for Completion of Performance Measure	Priority	Performance Measure	Resources	Responsible Team	
<b>Theme 2 – Delivering The Homes Required</b>						
2.1	Work with developers and landowners to deliver the housing sites allocated in Local Plan 2030, across all tenures.	Ongoing Individual timescales for each site	High	Housing sites delivered, including: <ul style="list-style-type: none"> <li>• Identification of landowners</li> <li>• Responding to applications for pre application advice</li> <li>• Processing planning applications</li> <li>• Negotiation of S106 agreements</li> <li>• Administration of viability assessments where applicable.</li> </ul>	Staff time	Housing Strategy Development Management Planning Policy
2.2	Work with external agencies to ensure the Council is a key partner in the delivery of the Oxford – Cambridge Arc	Ongoing	High	Council's views and priorities articulated and taken into consideration in the development of plans for the Arc.	Staff time	Housing Strategy Planning Policy Other Council teams as appropriate
2.3	Ensure all proposals to deliver less than policy compliant affordable housing on new housing development sites are fully justified following rigorous external examination on behalf of the Council	Ongoing As viability appraisals are submitted	High	External assessment of submitted viability appraisals completed, results examined and taken into account in the determination of planning applications. Variations from policy compliance minimised.	Staff time	Housing Strategy  Development Management
2.4	Build upon established relationships with Registered Provider partners and those new to Bedford Borough where they have the capacity, skills and commitment to assist with meeting affordable housing needs.	Ongoing	Medium	Relationships with existing Registered Providers maintained. Suitable potential new Registered Providers identified and schemes progressed	Staff time	Housing Strategy
2.5	Nurture relationships with funding organisations such as Homes England and SEMLEP to ensure that opportunities to fund affordable housing and key infrastructure projects are maximised.	Ongoing	High	Funding for affordable housing schemes secured. Potential to bid for funding for infrastructure identified and submitted where approved.	Staff time	Housing Strategy Other Council Teams as appropriate

Action		Timescale for Completion of Performance Measure	Priority	Performance Measure	Resources	Responsible Team
2.6	Utilise Policy 59S of the Local Plan 2030 to identify sites where supported housing can be provided to meet identified needs	2026 As individual qualifying sites come forward	High	Supported housing sites identified and delivered.	Staff time	Housing Strategy
2.7	Work with One Public Estate and other partners, landowners and developers to deliver key urban sites, including the preparation of development briefs and design codes where required.  Ensuring that affordable housing is maximised where viability issues are identified.	2021  Ongoing as Viability appraisals are submitted	High	Development briefs developed and published  Viability appraisals completed if appropriate, results examined and taken into account in the determination of planning applications.	Staff time	Planning Policy Housing Strategy Development Management
2.8	Commission independent viability evidence to support the policies contained in the new Local Plan.	December 2023	High	Viability evidence received and policies informed. Evidence published. Plan adopted.	Staff time Financial Cost of Consultancy to deliver the report – to be funded from Development Plan Reserve.	Housing Strategy  Planning Policy
2.9	Support Neighbourhood Plan groups and / or Parish Councils to prepare, deliver and update their plans.	Ongoing In line with Regulatory requirements for individual plans	High	Neighbourhood Plans delivered with support from the Council in line with statutory and regulatory deadlines.	Staff time	Housing Strategy Planning Policy
2.10	Work with Parish Councils, Registered Providers and other partners to bring forward rural exception schemes where a need has been identified.	Ongoing As potential schemes are identified	Medium	Rural exception schemes identified and progressed.	Staff time	Housing Strategy



Action	Timescale for Completion of Performance Measure	Priority	Performance Measure	Resources	Responsible Team
2.11 Proactively work with affordable housing partners to identify and bring forward sites where affordable housing in excess of policy compliant levels can be delivered. Consider the use of these sites to deliver supported housing, adapted housing or supported housing where appropriate.	Ongoing As sites become available	Medium	Sites where affordable housing in excess of policy compliant levels and / or supported housing can be provided are identified, considered, facilitated and delivered.	Staff time	Housing Strategy
2.12 Assess the potential for new local plan policies to improve the quality of development as part of the new local plan.  Support and encourage Registered Provider partners' proposals to deliver affordable housing with higher environmental standards than those required by building regulations.	December 2023  2026 As sites are identified	High	Decision made about whether or not new policies are needed. If they are, new policies drafted and submitted for examination and Plan adopted.  Schemes with Registered Providers that deliver enhanced sustainability standards identified, progressed and delivered.	Staff time	Housing Strategy Planning Policy
2.13 In line with the Council's duty, consider how the disposal of the Council's own assets might assist in meeting identified demand for plots suitable for self- build.  Work with planning applicants and neighbourhood planning groups to ensure opportunities to meet identified needs for self- build plots are maximised through the planning process.	Ongoing As proposals to dispose of Council owned sites come forward.  As potential developer led housing schemes come forward.	High	Potential to deliver self-build plots on Council owned sites considered and delivered if appropriate.  Neighbourhood Plans consider the need for self-build plots and include policies relating to them where appropriate.  Developers are encouraged to consider the provision of self-build plots as part of their proposals for housing sites.	Staff time	Housing Strategy Property Services Development Management
2.14 Ensure opportunities to meet identified need for self-build plots is considered in the drafting of the new Local Plan Policies.	January 2024	High	Prepare evidence base to support inclusion of a new self -build policy in the new Local Plan. New Policy supported at examination and Local Plan adopted.	Staff time	Housing Strategy Planning Policy
2.15 Identify sites that deliver the GTAA 2017 needs for pitches for Gypsy and Traveller and plots for Travelling Showpeople. Manage these sites forward such that they are delivered within the identified timeframes.	2026	High	Deliver identified sites in line with the timetable requirements of the GTAA.	Staff time	Housing Strategy

Action		Timescale for Completion of Performance Measure	Priority	Performance Measure	Resources	Responsible Team
<b>Theme 3 – Making Best Use of Existing Housing</b>						
3.1	Investigate options for updating the Council's data in relation to Private Sector Housing when the period covered by the BRE report expires in 2023.  Implement the chosen option.	2023 - 2024	High	Alternatives explored and decision made whether to renew BRE desktop study on private sector housing.  Chosen option to update data in relation to Private Sector Stock implemented.	Staff time	Housing Strategy Environment
3.2	Agree, implement and monitor the work plan produced by the Fuel Poverty Steering Group, including investigation and implementation of appropriate energy efficiency schemes	2026 In line with targets contained in the work plan	High	Work plan monitored and actions completed where appropriate.	Staff time	Housing Strategy Environment
3.3	Investigate and if appropriate implement LA Flex scheme, working collaboratively with other local authorities where this could add value.	2021	Medium	LA Flex scheme is investigated and if appropriate approved and implemented. Opportunities to work collaboratively with other local authorities are explored.	Staff time	Environment
3.4	Implement the Council's Empty Homes Strategy 2019 - 2024.  Review and renew the Empty Homes Strategy as it expires.	Annually  2025	High	Empty Homes Strategy Action Plan reviewed and published  New Empty Homes Strategy completed and published.	Staff time	Housing Strategy
3.5	If confirmed in November 2020, monitor the impact of the Article 4 direction on the number of new HMOs being delivered and how that might impact on meeting housing need.	2022 - 2023	High	Impact on number of HMOs monitored.	Staff time	Development Management Housing Strategy Community Regulation
3.6	Consider the future of the HMO Additional Licensing Scheme and implement the chosen course of action. This includes considering the potential to introduce Selective Licensing Scheme(s) if appropriate.	2023	High	Decision made whether to continue Additional Licensing Scheme or not.	Staff time	Community Regulation

Action		Timescale for Completion of Performance Measure	Priority	Performance Measure	Resources	Responsible Team
3.7	Implement and monitor the success of the Housing Assistance Policy adopted in 2020. Review and update this Policy as appropriate.	2025	Medium	Housing Assistance Policy reviewed and updated as required.	Staff time	Housing Strategy Home Improvement Team
3.8	Obtain, maintain, analyse and review the DFG data available from the HIACM system. Use this data to inform decisions in relation to DFG funding.	2022	Medium	Request data from Home Improvement Team and complete analysis. Collect data annually to establish trends.	Staff time	Housing Strategy Home Improvement Team
3.9	Review the Council's Allocation Scheme regularly to ensure best use is made of affordable housing available for letting.	Annually	High	Allocations Scheme reviewed and updated as required.	Staff time	Housing Services
3.10	Work with Registered Providers to establish and implement schemes that help address issues of under occupancy of affordable rented housing. Undertake research to obtain from Registered Provider partners data on under occupancy and overcrowding in their stock	2026	Medium	Schemes identified and implemented.	Staff time	Housing Strategy
		2021		Data obtained		
3.11	Review what funding initiatives are available to improve energy efficiency of properties, investigate these and, if appropriate, implement them.	2025 - 2026	High	Possible funding initiatives identified, decision made about whether they can be implemented and, if appropriate, schemes implemented	Staff time	Environment
3.12	Review and Update the Council's Tenancy Strategy 2019 - 2024 as it expires.	2024	High	Tenancy Strategy 2025 updated and published.	Staff time	Housing Strategy

Action		Timescale for Completion of Performance Measure	Priority	Performance Measure	Resources	Responsible Team
<b>Theme 4 – Meeting the Housing Needs of Vulnerable People</b>						
4.1	Manage the production and adoption of the Physical Disabilities Accommodation Strategy 2021 - 2026.	2021	High	Physical Disabilities Accommodation Strategy 2020 – 2025 adopted and published.	Staff time	Housing Strategy
4.2	Implement the Action Plans associated with all Care & Support Accommodation Strategies.	Ongoing In line with undertakings in the Strategies	High	Action Plans Reviews completed and published.	Staff time	Housing Strategy
4.3	Renew each of the Care & Support Accommodation Strategies as they expire.	2023 - 2026 As Each Strategy Expires	High	Care & Support Accommodation Strategies updated, adopted and published.	Staff time	Housing Strategy
4.4	Complete the Homelessness and Rough Sleeping Review.	2020	High	Review completed.	Staff time	Housing Strategy
4.5	Based upon that Review, write and secure the adoption of the Homelessness and Rough Sleeping Strategy 2022 - 2027.	2022	High	Homelessness and Rough Sleeping Strategy 2022- 2027 adopted and published.	Staff time	Housing Strategy
4.6	Implement the Action Plan associated with the Homelessness and Rough Sleeping Strategy 2022 - 2027.	2023 - 2027 In line with undertaking in the Strategy	High	Action Plan Review completed.	Staff time	Housing Strategy
4.7	Identify vulnerable groups other than those covered by the Care and Support Accommodation Strategies and their accommodation needs.  Where needs are identified, work with Registered Providers and other partners to bring forward schemes to meet those needs including ensuring an efficient nominations process.	2021  Ongoing as sites become available	Medium	Needs established.  Potential schemes investigated and delivered.	Staff time	Housing Strategy Adult Services
4.8	Utilise Policy 59S of Local Plan 2030 to support the provision of supported housing schemes on qualifying sites.	December 2023	High	New Local Plan policies drafted taking into account the need to meet the needs of vulnerable groups. Plan examined and adopted.	Staff time	Housing Strategy Planning Policy

<b>Action</b>		<b>Timescale for Completion of Performance Measure</b>	<b>Priority</b>	<b>Performance Measure</b>	<b>Resources</b>	<b>Responsible Team</b>
4.9	Work with Registered Provider partners to identify sites within their control that might deliver supported housing schemes. Manage forward identified sites	Ongoing  As sites become available	Medium	Possible sites identified.  Sites delivered.	Staff time	Housing Strategy
4.10	If necessary, assist with the drafting of any housing policies contained within the new Local Plan to ensure they support the provision of supported housing where needs are identified.	December 2023	High	New Local Plan policies drafted taking into account the need to meet the needs of vulnerable groups. Plan examined and adopted.	Staff time	Housing Strategy Planning Policy
4.11	Review the success of supported housing sites that have been delivered and where appropriate share learning opportunities and / or form plans to address any issues identified.	2026	Medium	Schemes reviewed and learning opportunities shared where appropriate.	Staff time	Housing Strategy Adult Services
4.12	Work with Central Bedfordshire Council and the landowner / developer to deliver supported housing provision at Wixams Village 3	2025 - 2026	Medium	Supported housing needs for Wixams Village 3 identified. Sites identified and delivered.	Staff time	Housing Strategy Development Management

## Notes



## Notes

## Finding out more

If you would like further copies, a large-print copy or information about us and our services, please telephone or write to us at our address below.

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তথ্যের জন্য



01234 267422



**Environment**

Planning & Highways

Bedford Borough Council

Borough Hall

Cauldwell Street

Bedford MK42 9AP



housing.strategy@bedford.gov.uk



www.bedford.gov.uk