

5 YEAR SUPPLY OF DELIVERABLE HOUSING SITES

2024/25 - 2028/29

January 2025

1. Introduction

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

The five year period

1.2 The five year supply period is measured from the start of the current financial year. Year one of the calculation is the year 2024/25 and year five is the year 2028/29.

Approach to the calculation of five year supply

- 1.3 Paragraph 78 of the National Planning Policy Framework (NPPF) 2024 states that "Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old.³⁹" Footnote 39 adds "unless these strategic policies have been reviewed and found not to require updating. Where local housing need is used as the basis for assessing whether a five year supply of specific deliverable sites exists, it should be calculated using the standard method set out in national planning practice guidance."
- 1.4 As Bedford Borough Council's adopted strategic policies from the Local Plan 2030 are more than five years old, the Council assesses its deliverable supply of housing against its calculated local housing need figure.
- 1.5 Bedford Borough's local housing need figure, as derived from the government's standard method, is 1,202 dwellings per annum.
- 1.6 As set out in paragraph 78, the NPPF requires an appropriate buffer (moved forward from later in the plan period) to be applied to the housing requirement (including any shortfall). The appropriate buffer to be applied is one of:
 - a) 5% to ensure choice and competition in the market for land; or

- b) 20% where there has been significant under delivery of housing over the previous three years (as measured against the Housing Delivery Test, where this indicates that delivery was below 85% of the housing requirement), to improve the prospect of achieving the planned supply; or
- c) From 1 July 2026, for the purposes of decision-making only, 20% where a local planning authority has a housing requirement adopted in the last five years examined against a previous version of this Framework⁴¹, and whose annual average housing requirement⁴² is 80% or less of the most up to date local housing need figure calculated using the standard method set out in national planning practice guidance. Footnote 41 adds "or the housing requirement is more than five years old and the relevant strategic policies have been reviewed and found not to require updating". Footnote 42 defines the annual average housing requirement as "the total housing requirement, divided by the number of years in the plan period".
- 1.7 For Bedford Borough, option c) does not apply at present. In relation to option b), the most recent Housing Delivery Test result published in December 2024 shows that the Council has achieved 145%. As a result there are no consequences for the Council and the application of a 20% buffer on the five year land supply is not required. Therefore, the buffer to be applied is 5% (option a)).
- 1.8 The standard method figure of 1,202 dwellings per annum equates to 6,010 over a five-year period. As set out above, a 5% buffer is required and once applied, results in a five-year housing requirement of 6,311 dwellings.

2. Housing provision to be delivered

2.1 The supply evidenced below is based on the standard method figure of 1,202 dwellings per annum.

Table 1: The 5 year supply calculation.

| | Bedford Borough local housing need calculated using the standard method | |
|---|---|---|
| Α | Annual requirement | 1,202 |
| В | Base requirement over next five years A x 5 | 6,010 |
| С | Five year requirement plus 5% buffer B + 5% | 6,311 |
| D | Revised annual requirement C divided by 5 | 1,262 |
| E | Deliverable supply over next five years (projected completions in 2024/25, 2025/26, 2026/27, 2027/28 and 2028/29) | 2024/25 = 707 2025/26 = 803 2026/27 = 897 2027/28 = 902 2028/29 = 1062 Total = 4,371 |
| F | Number of years supply (deliverable supply divided by annual target) E divided by D | 3.46 years |

3. Development sites with the potential to deliver housing

The 5 year target will be met through the delivery of residential dwellings from different types of identified development sites. In order to qualify as a specific site which should be counted within the 5 year supply a site should meet the definition of deliverable set out in the glossary of the NPPF 2024 which reads:

Deliverable: To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:

- a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).
- b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.
- The assessment of deliverable sites draws on the Council's own intelligence in respect of individual sites supplemented by information gained through ongoing contact between developers and landowners and Planning and Council Tax Officers.
- 3.3 The types of sites which make a contribution to the five year supply are:
 - Sites with planning permission or with the benefit of prior approval (Part 3, Class O of the GPDO 2015 (as amended))
 - Sites with planning permission identified in the Bedford Borough Local Plan 2002
 - Sites with planning permission identified in the Allocations and Designations Local Plan 2013
 - Sites with planning permission identified in the Bedford Borough Local Plan 2030
 - Sites with planning permission identified in made Neighbourhood Plans
 - Additional capacity on allocated sites
 - Windfall

Windfall

- 3.4 Paragraph 75 of the NPPF states that "Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends. Plans should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area."
- 3.5 The Council has given due regard to historical windfall delivery rates, the supply of outstanding planning permissions, and anticipated opportunities for new windfall supply in the Borough. Despite the national economic uncertainties in recent times, windfall delivery rates have remained relatively high (see Appendix 2). There has however been a period when fewer planning applications have been received and determined due to other constraints relating to housing supply which are now beginning to ease.
- 3.6 For this reason there is a need for some caution about windfall delivery rates and therefore the Council has included an annual windfall allowance of 135 dwellings within the deliverable supply. This allowance is lower than the historic trend and is a robust approach.

4. Specific deliverable sites

| 4.1 | Appendix 3 sets | out the specific sites | that are likely | to deliver housing | over the five-yea | r period beginning on | 1 April 2024. |
|-----|-----------------|------------------------|-----------------|--------------------|-------------------|-----------------------|---------------|
|-----|-----------------|------------------------|-----------------|--------------------|-------------------|-----------------------|---------------|

5. Conclusions

5.1 The Council has identified a supply of specific deliverable sites that are likely to deliver an additional 4,371 dwellings in the five-year period. When a 5% buffer is applied this represents a supply of 3.46 years.

Appendix 1: Recent housing delivery

| Year | Total completions | Relevant housing requirement | Basis for the housing requirement |
|---------|-------------------|------------------------------|--|
| 2014/15 | 828 | target 879 | Cara Stratagy and Pural lagues plan |
| | | | Core Strategy and Rural Issues plan |
| 2015/16 | 964 | 884 | Strategic Housing Market Assessment 2015 |
| | | | Strategic Housing Market Assessment |
| 2016/17 | 1255 | 950 | Update 2016 |
| | | | Strategic Housing Market Assessment |
| 2017/18 | 1350 | 950 | Update 2016 |
| | | | Strategic Housing Market Assessment |
| 2018/19 | 1359 | 970 | Addendum 2018 |
| 2019/20 | 1026 | 970 | Bedford Borough Local Plan 2030 |
| 2020/21 | 1199 | 970 | Bedford Borough Local Plan 2030 |
| 2021/22 | 1019 | 970 | Bedford Borough Local Plan 2030 |
| 2022/23 | 1465 | 970 | Bedford Borough Local Plan 2030 |
| 2023/24 | 689 | 970 | Bedford Borough Local Plan 2030 |

Appendix 2: Windfall analysis

A historic 10 year analysis of completions on non-allocated sites has been undertaken. The results are shown below. The windfall allowance is based on contributions from the urban area and sites of 0-4 dwellings in the rural area.

Urban and rural area (Core Strategy and Rural Issues Plan Growth Area up to 2017/18)

| Year | Net completions on sites of 0-4 dwellings in the urban area | Net completions on sites of 5-24 dwellings in the urban area | Net completions on sites of 0-4 dwellings in the rural area | Total |
|-----------------|---|---|---|-------|
| 2014/15 | 23 | 77 | 22 | 122 |
| 2015/16 | 15 | 85 | 22 | 122 |
| 2016/17 | 42 | 141 | 31 | 214 |
| 2017/18 | 48 | 103 | 33 | 184 |
| 2018/19 | 21 | 108 | 23 | 152 |
| 2019/20 | 15 | 80 | 14 | 109 |
| 2020/21 | 92 | 199 | 68 | 359 |
| 2021/22 | 14 | 85 | 11 | 110 |
| 2022/23 | 49 | 127 | 51 | 227 |
| 2023/24 | 24 | 12 | 32 | 68 |
| Total | 343 | 1017 | 307 | 1667 |
| 10 year average | 34 | 102 | 31 | 167 |

Appendix 3: Five year supply of deliverable sites

| | | | | | 1 | 2 | 3 | 4 | 5 |
|---|------------------------------|--|--|--|---------|---------|---------|---------|---------|
| Site name | Planning ref | Gross number with planning permission | Total number of net completions at 31/3/24 | Number of units outstanding at 31/3/24 (net) | 2024/25 | 2025/26 | 2026/27 | 2027/28 | 2028/29 |
| Sites in Bedford and Kempston with planning permission for 25 dwellings and above | | | | , | | | | | |
| Bedford, Dallas Road | 19/02247/MAF | 341 | 0 | 341 | | | 50 | 130 | 161 |
| Bedford, AECOM House, 200 Horne Lane | 21/02136/CPNO | 28 | 0 | 28 | 28 | | | | |
| Bedford, 11 Lurke Street | 22/01137/CPNMA | 26 | 0 | 26 | | 26 | | | |
| Bedford, 1 Lurke Street | 23/01315/CPNMA | 26 | 0 | 26 | 26 | | | | |
| Sites in the rural area with planning permission for 5 dwellings and above | | | | | | | | | |
| Great Barford, Land north of Roxton Road | 23/00495/REM 24/00237/NMA | 7 | 0 | 7 | | 7 | | | |
| Milton Ernest The Old Maltings | 16/01397/FUL | 6 | 0 | 6 | 6 | | | | |
| Radwell, Radwell Hall Farm, Bridge End | 22/01435/FUL | 5 | 0 | 5 | | | 5 | | |
| Shortstown, Land r/o sheds (eastern and south eastern land parcels) | 20/00901/EIA | 592 | 271 | 321 | 85 | 88 | 90 | 58 | |
| Turvey, Grain Store | 10/02406/MAO 21/02818/M73 | 108 | 54 | 54 | | 16 | 28 | 10 | |
| Wilstead, Land rear of 25 to 39 Howard Close | 19/01019/MAO 21/03124/MAR | 30 | 15 | 15 | 15 | | | | |

| | | | | | 1 | 2 | 3 | 4 | 5 |
|--|--|--|--|--|---------|---------|---------|---------|---------|
| Site name | Planning ref | Gross number with planning permission | Total number of net completions at 31/3/24 | Number of units outstanding at 31/3/24 (net) | 2024/25 | 2025/26 | 2026/27 | 2027/28 | 2028/29 |
| Wilstead, North End Farm / Seasons car park | 14/00700/MAO | 25 | 0 | 25 | | | | 15 | 10 |
| Wymington, 124 Rushden Road and land rear of 98-124 Rushden Road | 20/02825/MAO 23/01287/MAR | 13 | 0 | 12 | | 12 | | | |
| Key sites with approval subject to Section 106 | | | | | | | | | |
| Bedford, Rushmore School | 21/01940/MAF | 55 | 0 | 55 | | | | | 55 |
| Local Plan 2002 sites with planning permission | | | | | | | | | |
| Biddenham, Land north of Bromham Road | 01/02199/EIA + RMS | 1300 | 735 | 565 | 53 | 73 | 75 | 95 | 56 |
| Great Denham, Land adjacent to Mercia Road | 21/01582/MAF | 95 | 0 | 95 | 20 | 50 | 25 | | |
| Wixams, Land north of The Causeway | 18/03158/MAF | 57 | 0 | 57 | | 57 | | | |
| Wixams Village 2 | 99/01645/OUT + RMS | 1070 | 948 | 122 | 40 | 40 | 34 | | |
| Wixams Village 3 | 99/01645/OUT + RMS | 564 | 18 | 546 | 110 | 110 | 94 | 85 | 85 |
| Wixams Village 4 | 16/02595/MAR 19/00546/MAR 23/01008/MAR | 145 | 145 | 111 | 6 | 50 | 50 | 5 | |
| Local Plan 2030 sites with planning permission | | | | | | | | | |
| Biddenham, Land at Gold Lane | 21/02820/M73 21/03302/MAR | 249 | 184 | 65 | 65 | | | | |

| | | | | | 1 | 2 | 3 | 4 | 5 |
|--|------------------------------|--|--|--|---------|---------|---------|---------|---------|
| Site name | Planning ref | Gross number with planning permission | Total number of net completions at 31/3/24 | Number of units outstanding at 31/3/24 (net) | 2024/25 | 2025/26 | 2026/27 | 2027/28 | 2028/29 |
| Biddenham, Land to the rear of Bromham Road | 19/01394/MAO 23/01106/MAR | 40 | 0 | 40 | | | | 20 | 20 |
| Ravensden, Land at Graze Hill | 21/01901/MAR | 163 | 46 | 117 | 55 | 55 | 7 | | |
| Neighbourhood Plan sites with planning permission | | | | | | | | | |
| Bromham, Beauchamp Park | 19/01904/MAO | 390 | 0 | 390 | | | 50 | 75 | 75 |
| Bromham, Land at Stagsden Road | 20/02520/MAR | 80 | 59 | 21 | 21 | | | | |
| Carlton, Land at the Causeway | 21/02406/FUL | 9 | 7 | 2 | 2 | | | | |
| Oakley, Land at Station Road | 21/02394/MAO | 40 | 0 | 40 | | | 20 | 20 | |
| Roxton, Land North of School Lane | 21/00014/MAO 21/03333/MAR | 50 | 0 | 50 | 30 | 20 | | | |
| Thurleigh, Land adj 67 High Street | 19/00711/MAO 22/00370/MAR | 20 | 0 | 20 | 10 | 10 | | | |
| Thurleigh, The Beeches and rear of High Street | 20/02155/MAO 23/00386/M73 | 11 | 0 | 10 | | 4 | 6 | | |
| Wootton, Land south of Keeley Lane | 22/01035/MAO 23/02636/MAR | 20 | 0 | 20 | | 10 | 10 | | |
| Willington, Land between Sandy Road and Wood Lane | 20/02151/MAO 23/01034/MAR | 50 | 0 | 50 | | 25 | 25 | | |
| Windfall | | | | | 135 | 135 | 135 | 135 | 135 |
| Local Plan 2030 sites without planning permission | | Number of units | | | | | | | |
| Sites within the urban area | | | | | | | | | |
| Greyfriars | 20/00140/MAO | 250 | | | | | | | 50 |

| | | | | | 1 | 2 | 3 | 4 | 5 |
|---|--------------|--|--|--|---------|---------|---------|---------|---------|
| Site name | Planning ref | Gross number with planning permission | Total number of net completions at 31/3/24 | Number of units outstanding at 31/3/24 (net) | 2024/25 | 2025/26 | 2026/27 | 2027/28 | 2028/29 |
| Borough Hall and Prebend | | 225 | | | | | | | 50 |
| Street Mowbray Road | | 118 | | | | | 40 | 40 | 38 |
| Edge of urban area | | 110 | | | | | 40 | 40 | 30 |
| Lodge Hill | | 50 | | | | | 25 | 25 | |
| Neighbourhood Plan sites without planning permission | | | | Capacity estimate | | | | | |
| Key service centres | | | | | | | | | |
| Bromham, Old Stable Yard Development | | | | 30 | | | | | 30 |
| Clapham, Milton Road | 21/00332/EIA | | | 500 | | | | 50 | 100 |
| Great Barford, Great Barford West | | | | 500 | | | | 25 | 50 |
| Sharnbrook, Hill Farm, Mill Road | 22/02193/MOF | | | 500 | | 15 | 50 | 75 | 75 |
| Wootton, Land between Potters Cross and Wootton Road | | | | 50 | | | 40 | 10 | |
| Wootton, Land south of Keeley Lane | 23/01846/MAF | | | 20 | | | 15 | 5 | |
| Wootton, Land at Tinkers Corner | | | | 15 | | | 15 | | |
| Rural service centres | | | | | | | | | |
| Bletsoe, Land north of the Old Rectory | | | | 3 | | | | | 3 |
| Harrold, Land at Odell Road | | | | 17 | | | | | 17 |
| Milton Ernest, Land at Rushden Road | 23/02638/MAO | | | 25 | | | | | 10 |

| | | | | | 1 | 2 | 3 | 4 | 5 |
|---|--------------|--|--|--|---------|---------|---------|---------|---------|
| Site name | Planning ref | Gross number with planning permission | Total number of net completions at 31/3/24 | Number of units outstanding at 31/3/24 (net) | 2024/25 | 2025/26 | 2026/27 | 2027/28 | 2028/29 |
| Oakley, Land to the rear of High Street | 23/02494/MAO | | | 10 | | | | | 10 |
| Ravensden, Land adjoining Willow Farm, Butler Street | | | | 15 | | | | | 15 |
| Turvey, Mill Rise | 21/03304/MAF | | | 24 | | | 8 | 14 | 2 |
| Turvey, Carlton Road | 23/00019/MAO | | | 25 | | | | 10 | 15 |
| Housing supply | | | | | 707 | 803 | 897 | 902 | 1062 |
| Total housing supply | | | | | | | | | 4,371 |
| Five year supply in years | | | | | | | | | 3.46 |