



BEDFORD
BOROUGH COUNCIL

5 YEAR SUPPLY OF DELIVERABLE HOUSING SITES

2023/24 - 2027/28

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 2023/24 and year five is the year 2027/28.

Approach to the calculation of five year supply

- 1.3 Paragraph 74 of the National Planning Policy Framework (NPPF) 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 guidance.”
- 1.4 The implication of this for Bedford Borough is that following the adoption of the Bedford Borough Local Plan 2030 on 15 January 2020 the assessment of housing land supply should be based on the Local Plan figure of 970 dwellings per annum.
- 1.5 As set out in paragraph 74, 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) 10% where the local planning authority wishes to demonstrate a five year supply of deliverable housing sites through an annual position statement or recently adopted plan, to account for any fluctuations in the market during that year; or
 - c) 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.

- 1.6 For Bedford Borough, option b) does not apply as the Council is not seeking to demonstrate a five year supply of deliverable housing sites through an annual position statement or a recently adopted plan. In relation to option c), the most recent Housing Delivery Test result published in January 2022 shows that the Council has achieved 144%. 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)).

2. Housing provision to be delivered

2.1 The supply evidenced below is based on the Local Plan housing target of 970 dwellings pa.

Table 1: The 5 year supply calculation.

	Bedford Borough Local Plan 2030 Housing requirement 2015 - 2030 (15 years)	14,550
A	Annual requirement	970
B	Requirement to date A x 8	7,760
C	Total completions to date (2015/16, 2016/17, 2017/18, 2018/19, 2019/20, 2020/21, 2021/22 and 2022/23 (8 years))	9,637
D	Shortfall to date (annual requirement (A) multiplied by 8 minus completions in the first 8 years of the plan (C) (A x 8) - C	$(970 \times 8) - 9,637 = -1,877$
E	Base requirement over next five years A x 5	4,850
F	Base requirement over next five years plus shortfall E + D	2,973
G	Five year requirement and shortfall plus 5% buffer F + 5%	3,122
H	Revised annual requirement and shortfall over next five years G divided by 5	624
I	Deliverable supply over next five years (projected completions in 2023/24, 2024/25, 2025/26, 2026/27 and 2027/28)	2023/24 = 693 2024/25 = 843 2025/26 = 836 2026/27 = 969 2027/28 = 985 Total = 4,326
J	Number of years supply (deliverable supply divided by annual target) I divided by H	6.93

3. Development sites with the potential to deliver housing

- 3.1 The 5 year target will be met through the delivery of residential dwellings from different types of identified development sites. In order to qualify as a specific site which should be counted within the 5 year supply a site should meet the definition of deliverable set out in the glossary of the NPPF 2023 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.

- 3.2 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 71 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-year period beginning on 1 April 2023.

5. Conclusions

- 5.1 The Council has identified a supply of specific deliverable sites that are likely to deliver an additional 4,326 dwellings in the five-year period. When a 5% buffer is applied this represents a supply of 6.93 years.

Appendix 1: Recent housing delivery

Year	Total completions	Relevant housing requirement target	Basis for the housing requirement
2011/12	919	879	Core Strategy and Rural Issues plan
2012/13	654	879	Core Strategy and Rural Issues plan
2013/14	997	879	Core Strategy and Rural Issues plan
2014/15	828	879	Core Strategy and Rural Issues plan
2015/16	964	884	Strategic Housing Market Assessment 2015
2016/17	1255	950	Strategic Housing Market Assessment Update 2016
2017/18	1350	950	Strategic Housing Market Assessment Update 2016
2018/19	1359	970	Strategic Housing Market Assessment 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

Appendix 2: Windfall analysis

An 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
2013/14	25	70	20	115
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
Total	344	1075	295	1714
10 year average	34	108	30	171

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 31/3/23	Number of units outstanding at 31/3/23 (net)	2023/24	2024/25	2025/26	2026/27	2027/28
Sites in Bedford and Kempston with planning permission for 25 dwellings and above									
Bedford, Land adjacent to The Heights, 25 St Johns Street	05/00598/FUL	153	109	44		44			
Bedford, Dallas Road	19/02247/MAF	341	0	341				50	50
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, Kingsway Apartments, Kingsway	22/01975/M73	72	0	72				72	
Kempston, 389 and former Lidl site 393-401 Bedford Road	20/00021/MAF	60	0	60	60				
Sites in the rural area with permission for 5 dwellings and above									
Little Staughton, Land adj Baptist Chapel, High Street	21/00744/FUL	7	0	7	7				
Milton Ernest The Old Maltings	16/01397/FUL	6	0	6	6				
Riseley, Riseley Lower School, Church Lane	19/01765/FUL	9	0	9	9				
Roxton, Land North of School Lane	21/00014/MAO 21/03333/MAR	50	0	50	9	41			
Sharnbrook, Yelow Lane	20/02914/MAR	51	46	5	5				
Shortstown, Land r/o sheds (eastern and south eastern land parcels)	20/00901/EIA	592	156	436	121	79	88	90	58
Shortstown, Nisa Local, North Drive	15/00541/FUL	5	1	4	4				

					1	2	3	4	5
Site name	Planning ref	Gross number with planning permission	Total number of net completions at 31/3/23	Number of units outstanding at 31/3/23 (net)	2023/24	2024/25	2025/26	2026/27	2027/28
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	0	30	3	15	12		
Wilstead, North End Farm / Seasons car park	14/00700/MAO 19/02289/MAF	39	0	39			10	29	
Wootton, 16 & 18 Bedford Road	22/00579/REM	5	0	4	4				
Wymington, 124 Rushden Road and land rear of 98-124 Rushden Road	20/02825/MAO	13	0	12			12		
Key sites with approval subject to Section 106									
Great Denham, Land adjacent to Mercia Road	21/01582/MAF	95	0	95			20	50	25
Local Plan 2002 sites with planning permission									
Biddenham, Land north of Bromham Road	01/02199/EIA + RMS	1300	706	594	19	53	73	75	95
Stagsden, Land west of Village Farm, Spring Lane	22/01932/REM	6	0	6	6				
Stewartby, Land east and west of Broadmead Road	97/01163/OUT 14/03135/MAR 17/02295/MAR 21/00722/MAF	621	610	151	11				
Wixams, Land north of The Causeway	18/03158/MAF	62	0	62		62			
Wixams Village 2	99/01645/OUT + RMS	1071	767	303	120	100	83		
Wixams Village 3	99/01645/OUT + RMS	564	0	564	8	110	110	80	80

					1	2	3	4	5
Site name	Planning ref	Gross number with planning permission	Total number of net completions at 31/3/23	Number of units outstanding at 31/3/23 (net)	2023/24	2024/25	2025/26	2026/27	2027/28
Wixams Village 4	16/02595/MAR 19/00546/MAR	145	145	116		4	50	50	12
Local Plan 2030 sites with planning permission									
Biddenham, Land at Gold Lane	21/02820/M73 21/03302/MAR	249	106	143	80	63			
Biddenham, Land to the rear of Bromham Road	19/01394/MAO	43	0	43				20	20
Ravensden, Land at Graze Hill	21/01901/MAR	163	0	163	35	55	55	18	
Neighbourhood Plan sites with planning permission									
Bromham, Land at Stagsden Road	20/02520/MAR	80	33	47	35	12			
Carlton, Land at the Causeway	21/02406/FUL	9	0	9		4	5		
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	11	0	10			4	6	
Wootton, Land south of Keeley Lane	22/01035/MAO	20	0	20			10	10	
Willington, Land between Sandy Road and Wood Lane	20/02151/MAO	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									
329 Bedford Rd, Kempston		5							5
Mowbray Road		124							40
Beverley Crescent		150							50
Edge of urban area									

[illegible]