

**Home Builders Federation**  
**Matter 3**

**BEDFORD LOCAL PLAN EXAMINATION**

**Matter 3 – Overall housing need**

**Issue**

Whether the plan has been positively prepared and whether it is justified, effective and consistent with national policy in relation to overall housing need.

**Plan policy focus – DS3(S)**

**Questions**

1. Has the calculation of local housing need (27,100 dwellings across the plan period 2020-2040) been undertaken appropriately using the standard method, the correct inputs and up to date evidence?

The HBF would agree that using the standard method the minimum number of homes the Council should be planning for is 27,100 dwellings between 2020 and 2040.

2. Do any circumstances exist where it might be appropriate to plan for a higher housing need figure than the standard method indicates? Is the Council's assumption that no uplift is required to take account of growth associated strategic infrastructure improvements justified? Is any uplift required to take account of or make effective the selected growth and employment strategy for the Borough?

No comment



3. Is a stepped annual housing requirement justified in principle? Is the basis for each step appropriately evidenced, and therefore justified?

The basis on which local plans should be prepared is that they will seek to ensure a consistent supply of homes in order to meet the annualised need arrived at using the standard method. Such an approach ensures that housing needs are, as stated in paragraph 68-021 of PPG, not pushed back unnecessarily to the end of the plan period and, in line with paragraph 60 of the NPPF, that there is a boost to housing supply.

The HBF recognises that in Bedford's case there is a significant change in the housing requirement increasing from 970 dpa in the current local plan to 1,355 dpa in the submitted plan. However, it should also be noted that in the three years preceding the point at which the plan period in this plan commences delivery was similar to the minimum required using the standard method with 1,255, 1,350 and 1,359 homes being delivered each year. Therefore, the difference between what was being delivered and the minimum housing requirements for this plan were negligible and clearly deliverable by the housing market in Bedford. As such, meeting the minimum requirement is not the sharp increase in supply that requires a step, as outlined in paragraph 68-021 of PPG, but rather a continuation of the number of homes that was being delivered in Bedford.

The Council's justification in their topic paper on the stepped trajectory (G9) includes the concern that much of the demand is being driven by in migration with the plan being required to provide housing for an extra 22,800 people over the plan period, and that this is greater than past trends. However, these figures must be set against the fact that constraints are preventing many areas in the wider south east from delivering housing to meet their needs. For example, it was highlighted through the examination of the London Plan that there will be a shortfall of around 140,000 homes between 2019 and 2029 based on the delivery expectations supporting the London Plan. Such shortfalls will inevitably see migration from constrained areas into other comparatively affordable areas that are within commuting distance of the capital. Indeed, with more home working such patterns of migration are likely to grow. As such the increase in migration is not a reason for a step, in fact we would suggest it is a reason to remove or reduce the step and ensure more homes are delivered sooner.

As such the reason for the stepped trajectory would appear to principally be a result of the chosen strategy and the infrastructure required to deliver that strategy. The decision to take forward a strategy that looks to meet needs later on in the plan period through large strategic allocations is one that would inevitably lead to the need for a stepped trajectory if the Council were to have a five year land supply on adoption, and indeed across the first half of the plan period.

Given the step is a result of the strategy taken forward rather than inherent barriers to supply the Council should have looked to improve supply in the first half of the local plan. Not only would this have met identified needs sooner but, as we set out in our representations, it would provide more of a buffer between needs and supply, an essential element for any strategy that is reliant on a few strategic allocations to meet the majority of housing needs post 2030. It should also be recognised that any delays or lower than expected rates of delivery on these sites would mean housing that is being built to meet needs from the first half of the plan being pushed back even further. The HBF is of the opinion that more could, and should, have been done to ensure more homes would be delivered earlier in the plan period by allocating a wide range of smaller sites that are not reliant on the key infrastructure improvements identified as essential to the delivery of the spatial strategy in the submitted local plan.

As such the HBF are concerned that the Council's strategy is one that unnecessarily delays meeting housing needs that did not have regard to paragraph 68-021 of PPG which states that "*In reviewing and revising policies, strategic policy-makers should ensure there is not a continued delay in meeting identified development needs*". The Council are in effect seeking to maintain the current requirement, increasing it slightly by 90 homes per annum in 2025/26, until 2030/31. This approach also means that between 2020 and 2030 (the end date for the current local plan) 10,638 homes will be delivered, around 3,000 homes less than the minimum required based on the standard method for that period. The danger of this shift in delivery away from those rates seen recently, which were more akin to the minimum LHNA, is that any opportunity to improve affordability will be lost.

What is also notable is that the Council do not consider the stepped trajectory to have any negative effects, stating at paragraph 8.33 in the Sustainability Appraisal (SUB 7) that "*No negative effects are identified whether the trajectory is stepped or not stepped*". However, whilst there is recognition in the SA that the preferred approach

may delay the delivery on new homes no consideration appears to have been given in the to the social impacts of delays in meeting housing needs until later in the plan period resulting from the adoption of a stepped trajectory and any consequential impacts this might have on affordability and affordable housing waiting lists.

This is clear failure to properly consider the impacts of the stepped trajectory and the benefits of identifying sites that would ensure more homes are delivered earlier in the plan period. Whilst this may not have removed the need for a step altogether it could have led to the council seeking to improve delivery in the first 10 years of the plan and significantly reduce what is a major step change in delivery from 2030.

*4. Are the needs of groups with specific housing requirements appropriately addressed, in light of paragraph 62 of the NPPF?*

No comment

*5. Should the plan set housing requirements for designated neighbourhood areas, in light of paragraph 66 of the NPPF?*

No comment

*6. Are any main modifications necessary for soundness?*

Further consideration must be given to the allocation of additional sites in order to support a housing trajectory that delivers more housing the first half of the plan period.

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