

Home Builders Federation

Matter 5

BEDFORD LOCAL PLAN EXAMINATION

Matter 5 – Spatial strategy and distribution of growth

Issue

Whether the plan is justified, effective and consistent with national policy in relation to the chosen spatial strategy and planned distribution of growth.

Plan policy focus – DS2(S) and DS5(S)

Questions

2. Is the plan period (2020–2040) justified? Does/should it set development for large strategic extensions and new settlements within a 30-year time frame, paying regard to paragraph 22 of the NPPF?

Where new settlements or significant extension are being planned that deliver beyond the plan period it is important that the vision for the plan goes beyond the end date and sets out what is required to ensure those sites can be delivered in full. However, this does not mean that the proposed plan period is unsound and must be extended to include each year until such developments are completed. But it is also important that deliver expectations on such sites are not inflated so that all these homes are delivered within the plan period. It is reasonable for the Council to include delivery outside of the plan period and that this can be accommodated for within the council's overall vision. At present the Council expects just 200 homes to be delivered beyond the plan period. However, this relies on delivery rates at the new settlements that go beyond what has been seen at other large strategic sites and would appear to represent a best-case



scenario. As set out in our representations and below the HBF does not question the allocation of these sites but do consider the delivery expectations to be high and that the plan is not deliverable over the plan period without additional allocations.

3. Assuming the amount of identified housing need and employment growth is soundly based, what options have been considered for accommodating the growth? Have reasonable alternatives been considered and is the rationale behind choices and reasoning for conclusions clear and justified by the evidence? Is it clear how the chosen spatial strategy was arrived at?

The council have considered a range of options as to how needs could be met in full. However, the SA does not consider scenarios where key pieces of the infrastructure required to support the chosen strategy, such as East West Rail, are delayed or does not come forward at all. Alternative strategies that looked at the consequences of delayed infrastructure and the strategy that would need to be taken into account under such a situation should have been considered. The choices made as to the allocation of sites and the level of flexibility required in housing supply to take account of these risks may well have been different had these alternative scenarios been considered.

9. Is there sufficient flexibility within the spatial strategy to accommodate unexpected delays whilst maintaining the credibility of the overall strategy?

No. Using the Council's most recent estimates of supply in G9 the Council can show a surplus of 1,427 homes over the plan period, 5.7% of the housing requirement. Whilst the HBF welcomes the fact that there is a surplus to delivery we are concerned that this is insufficient to ensure needs are met in full and that the plan is deliverable over the plan period.

As we set out in our representations the delivery expectations with regard to the strategic allocation at Kempston Hardwick and the new settlement at Little Barford are optimistic. Considering they are expected to deliver 7,200, homes over the final ten years of the plan (40% of total delivery between 2030 and 2040) there is a risk that should these sites not deliver as expected then housing needs will not be met. In general, it would be expected each outlet on a site to deliver between 50 and 75 homes per annum. Some sites may deliver more, but this is not commonly achieved. Analysis by Lichfield's in Start to Finish, referred to in our representations, of a range of sites

across England provides some further evidence as to average delivery per outlet. The research outlines that having more outlets operating at the same time will on average have a positive impact on build-out rates. However, the report goes on to state that “... *there are limits to this, likely to be due to additional capacity from the outlets themselves as well as competition for buyers*”. The report notes that for every additional outlet open there was a reduction in the average number of units built per outlet – 61 dpa for sites with one outlet, 51 for two and 45 for sites with 3 outlets.

As such it would be expected that in order to deliver 1,200 homes across Kempston Hardwick and Little Barford would require around 24 outlets to be operating across these two 2 allocations in the south and west of Bedford. This is a significant number of outlets to ensure delivery at the expected rates and whilst not impossible it is by no means certain that there will be capacity of the house building industry operating in Bedford to support the level of delivery as expected by the Council. Therefore, whilst the delivery of 500dpa and 600 dpa, as is expected on HOU14 and HOU19 towards the end of the plan period, has been achieved on strategic sites elsewhere in the Country it is optimistic with significant risk to needs being met in full should this level to delivery not be achieved.

There is also the risk that these sites will not commence as expected given that, as noted in table 5-2 of document E14, they are both highly unlikely to come forward without the associated transport schemes being in place. This position is reinforced in the local plan with both policies HOU14 and HOU19 stating that development will need to be delivered either following or in tandem with the delivery of the required infrastructure. Whilst the expectation is that critical infrastructure, such as the East West Rail (EWR) corridor and highway improvements along the A421, will be in place by 2030 are by no means certain. With regard to EWR in particular the timescales required to choose the preferred route between Bedford and Cambridge, secure funding, and obtain the relevant consents for this infrastructure, all of which is required prior to assembling the land needed and the eventual construction of this completely new route seems optimistic.

Any delay in the delivery of the required infrastructure will setback the point at which these two allocations will start delivering new homes. A delay at both of these sites would result in shortfall in housing supply against the minimum requirement. It is these risks and uncertainties that should have been recognised by the Council either in the

delivery expectations for these allocations or the size of the buffer between the minimum requirement and the level of supply.

In addition to the concerns regarding the delivery rates outlined above there are also risks regarding the delivery within the urban area of Bedford carried forward from the 2030 local plan. Whilst the annual delivery rates are reasonable the Council acknowledge at paragraph 3.10 of the Development Strategy Topic Paper that the delivery at scale in some parts of Bedford urban area will be challenging.

Paragraph 5.6 of the Development Strategy Topic Paper (F1) states that the delivery challenges have been taken into account and has pushed back commencement of these sites, with the four largest sites¹ not expected to commence to 2030/31. However, we could not find any specific commentary as to the ongoing challenges facing these sites and the progress that has been made with regard to their delivery. It will be essential that the Council provide evidence to show that the infrastructure constraints, multiple ownership, and viability concerns identified during the examination of the 2030 Local Plan will be resolved in order to justify their delivery as indicated by the Council in document G9.

Finally, the Council's estimate of supply includes windfall of 153 dwellings per annum across the whole plan period. This is based on the average windfall from past years for from net completions on sites of 0-4 units and 5-24 units in the urban area and 0-4 units in rural areas. With regard to deliver on sites of 0-4 units these appear reasonable. However, in relation to urban sites of 5-24 no evidence is presented that this level of delivery will continue across the plan period. Much of the delivery in the past will most likely be from the changes to permitted development rights introduced in 2013. However, once the low hanging fruit has been picked it is likely that the rates of windfall from such sites that has been seen in recent years will slow and it cannot be guaranteed that this level of delivery will continue.

On the basis of these risks to supply, the HBF would have expected a buffer of between 15% and 20% in overall supply to have been included through the allocation of additional sites that would come forward earlier in the plan period. At the very least a strategy that took into account a slower delivery rates alongside additional allocations

¹ Greyfriars, Ford End Road, Borough Hall and Preband, and South of the River.

should have been tested through the SA. However, the Council has chosen not to properly consider the impacts of delays at strategic sites and the need for a more significant buffer. Given the failure of the Council to properly test the proposed spatial strategy and the potential risks to delivery we are concerned that insufficient flexibility has been built into supply and that there are doubts as to whether the proposed housing trajectory is deliverable over the plan period.

19. Overall, is the spatial strategy sound, having regard to the Borough's assessed development needs and the requirements of national policy?

No. There is currently insufficient evidence to support the expected delivery rates in the local plan with regard to some sites that are required to ensure housing needs are met in full.

20. Are the Council's suggested modifications necessary for soundness? Are any other modifications necessary?

The HBF consider it necessary for further allocations to be included in the local plan to ensure that the plan is deliverable over the plan period.

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