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HOUSING DELIVERY AND SUPPLY REPORT 2020

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This document sets out the housing position for each local authority in Bedfordshire, using the indicators of supply (5YHLS) and delivery (Housing Delivery Test) as set out in the National Planning Policy Framework (NPPF). Taking account of delivery and supply, this document provides an outlook for housebuilders and developers.

SUPPLY:

Local Planning Authorities (LPA) are required to maintain a 5-year housing land supply (enough land to deliver their annualised housing requirement for a 5-year period).

The sites should be deliverable within that period. Where a LPA cannot demonstrate a 5YHLS, as per paragraph 11d of the NPPF, the presumption in favour of sustainable development applies, i.e. planning permission for housing (in sustainable locations) should be granted unless there are significant or demonstrable adverse impacts.

Information is obtained from LPA’s most recent publication either Authority Monitoring Report, Housing Delivery Test Action Plan or even SHLAA – this is hyper-linked in the figure with the date of the document’s publication (which is not necessarily the point in time when figure was calculated).

DELIVERY:

The Housing Delivery Test (HDT) is a how many homes were delivered in the last 3 years against the homes required in that same period.

From 2019, LPAs are penalised for not delivering housing by either Action Plan (<95%), Buffer (<85%) or Presumption (<45%).

In short, Action Plan requires a plan from LPA to boost housing delivery, Buffer requires 20% added to 5YHLS requirement, Presumption means presumption in favour of sustainable development applies.

LOCAL PLANS:

Local Plans play a fundamental role in maintaining housing land supply.

A new Local Plan will ensure that sufficient sites are allocated to meet the housing requirement over the plan period (for a short while at least).

Older LPs / Core Strategy’s tend to be based on out-dated housing requirement figures (i.e. not standard methodology), as such contain less allocations to meet up-to-date requirements (any plan which is over 5 year’s old must use standard method number).

FORECAST:

The forecast is a quick assessment of the situation with regards to the figures. The better the outlook, the better it is for developer looking to bring forward housing proposals. The forecast outline is as follows;

-  Sunny
-  Sunny spells
-  Cloudy
-  Rain

PI have experience in nearly all of the LPA, a few, we do not. The commentary is indicative to best of our knowledge and experience.



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BEDFORDSHIRE

LOCATION	HDT 2018	HDT 2019	HDT MEASURE	5YHLS	ADOPTED LOCAL PLAN	FORECAST
Bedford Borough Council	129%	125%	None	5.4 years December 2019	Bedford Borough Local Plan 2030	<p>The Council adopted their Local Plan in January 2020 and, subsequent to making changes recommended by the Local Plan Inspector, now have a 5.4 years housing land supply (as per Inspectors Report – Paragraph 122). Prior to the adoption of the Local Plan, BBC had 3 years housing land supply based on the standard number as their housing policies were out-of-date. The new Local Plan rectifies this, however it is clear that the Council have been scrambling to demonstrate a deliverable housing land supply - this is evident by only have 5.4 years on adoption. Maintaining a 5YHLS will depend on meeting completion rates in the Housing Trajectory; we believe this will be very difficult. Most of their 5,000 units supply is from extant permission (4,000) with relatively little coming from to windfall sites (500) and allocations (500). We expect many of these extant permissions will not be implemented as expected (due to implications of COVID) and expect the Council will no longer be able to demonstrate a 5YHLS in the not too distant future – maybe within a year, much like Milton Keynes.</p> <p>Interestingly, the Local Plan states that the Council will be pursuing alternative means of providing sites through rural exception sites and Neighbourhood Plans. We consider this represents an opportunity for the immediate short-term.</p> <p>Definitely one to monitor in the next 12 months, particularly housing appeals.</p>
Central Bedfordshire Council	110%	103%	None	6.21 years January 2020	<p>Core Strategy and Development Management Policies 2009 (North Bedfordshire)</p> <p>South Bedfordshire Local Plan Review (2004) (South Bedfordshire)</p>	<p>Despite both plans for the North and South areas being considerably dated, the Council still retains a 5YHLS. This position was recently defended at appeal.</p> <p>The draft Central Bedfordshire Local Plan 2015 - 2035 Examination Hearing Sessions closed 25 July 2019. There has been a delay due to a legal challenge from Luton Borough Council. The High Court refused permission for judicial review in May 2020 due to the potential impact of the COVID, additional evidence as requested by the Inspectorate has been delayed.</p> <p>As per the Housing Trajectory Schedule of Changes (31 January 2020), the total plan delivery target is 44,082, the five-year supply is 13,186 equating to 6.21 years supply. The Council have a very high delivery target, potential for delivery to fall under the required levels next year.</p>



LOCATION	HDT 2018	HDT 2019	HDT MEASURE	5YHLS	ADOPTED LOCAL PLAN	FORECAST
Luton Borough Council	178%	185%	None	7.83 years November 2019	Luton Local Plan (2011-2031)	<p>The Luton Local Plan 2011-2031 was adopted in November 2017 containing a target for 8,500 new homes in the 20-year period (425 per year) - this is despite an objectively assessed housing need of 17,800 detailed in the Local Plan.</p> <p>The reason for the lower provision is that Luton is has a number of identified land constraints including Green Belt.</p> <p>The majority of the housing need will instead be delivered in other part of the Strategic Housing Market Area, principally in Central Beds.</p> <p>Given this accepted, low housing target, Luton have very healthy housing delivery and supply figures, a position we do not expect to change in the short-term.</p>

