

Sent by email to: planningforthefuture@bedford.gov.uk

29/10/2018

Dear Sir/ Madam

Response by the House Builders Federation to the Bedford Local Plan

Thank you for consulting the Home Builders Federation (HBF) on the modifications to the proposed submission draft of the Bedford Local Plan. The HBF is the principal representative body of the housebuilding industry in England and Wales and our representations reflect the views of discussions with our membership of national and multinational corporations through to regional developers and small local housebuilders. Our members account for over 80% of all new housing built in England and Wales in any one year.

As the Council are expecting to submit the Local Plan to the Secretary of State prior to the end of the transitional period in January please note that all references to national policy relate to the documents in place prior to the amendments made earlier this year.

This consultation sets out the Council's decision to submit a plan to the secretary of state that changes the end date of this plan from 2035 to 2030. This reduces the plan period from 20 years to 15 years and means that on adoption the plan will have no more than 10 years remaining. The reduction in the plan period also means that the Council will be planning for 14,550 homes (970 dwellings per annum (dpa)) rather than 19,000 homes (950 dpa) in total. The justification for this that the Council considers the Colworth Garden Village is no longer considered appropriate. The HBF cannot comment on the suitability or otherwise of the Colworth Garden Village but we are concerned with the decision to reduce the plan period.

Our representation to the to first regulation 19 consultation outlined a number of concerns regarding the Council's Local Plan it was proposing to submit to the Secretary of State. Our principal concern was the Council's underestimation of housing needs. We did not agree with the Council's decision to adjust the demographic starting point to reflect the 10-year migratory trend or their 5% uplift in response to market signals. Neither of these concerns have been addressed in the latest consultation nor within the addendum to the Strategic Housing Market Assessment.

In particular it is concerning that the Council, evidently, does not consider the latest data which shows an increase in the lower quartile work placed based earing to house



price ratio¹ from 8.62 to 10.55 between 2016 and 2017 to be sufficient evidence of worsening affordability in the Borough. This latest data suggests a worsening trend and a situation that is significantly worse than the 7.70 ratio seen in 2008 prior to the recession and indicates the need for a higher uplift than the 5% that is still being proposed. We also note that the SHMA continues to identify Aylesbury Vale as a similar authority against which it makes comparisons on affordability. In relation to this it is interesting to observe that the inspector examining the Vale of Aylesbury Local Plan when faced with similar trends with regard to affordability and concerns regarding the need to support growth in the Oxford, Milton Keynes and Cambridge Growth corridor suggested in his interim report² an uplift of “at least 20% and probably 25%” was required to improve affordability.

It is also worth noting that on the 26th of October 2018 the Government published its consultation on the amendments to the standard methodology³ following the publication of the latest 2016-based population and household projections. This reiterates the Government’s intention to continue to plan for needs on the basis of the 2014 projections as this will ensure that the 300,000 homes per annum it considers necessary to improve affordability will be delivered. In particular the Government recognises in paragraph 25 of this document that whilst its standard methodology does not deliver 300,000 homes the gap will be bridged by:

“... by ambitious authorities going above their local housing need, including through housing deals with the Government, in regions like the Cambridge-Milton Keynes-Oxford corridor where significant national infrastructure investment to support productivity growth should also enable increased housing supply”

It shows the importance of local authorities such as Bedford not only in meeting needs but taking a more positive approach to delivery where infrastructure will be improved. Therefore, whilst the number of dwellings built each year is set to increase following these amendments we still consider the plan to be unsound with regard to its assessment of housing needs.

Plan period

We do not consider the plan period of 2015 to 2030 to be justified or consistent with national policy

Firstly, the Council are proposing to submit a plan for examination that is likely to have little more than 10 years of its plan period remaining following adoption. Such a short time period is contrary to the 15-year time frame for plans recommended in paragraph

¹www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/ratioofhousepricetoworkplacebasedearningslowerquartileandmedian

²https://www.aylesburyvaledc.gov.uk/sites/default/files/page_downloads/ED166%20Interim%20findings%2029%20August%202018%20.pdf

³ www.gov.uk/government/consultations/changes-to-planning-policy-and-guidance-including-the-standard-method-for-assessing-local-housing-need

157 of the National Planning Policy Framework. This short plan period means that any delays in the delivery of the allocations in the plan will lead to the Council being unable to meet the housing needs set out in this plan. In order to plan effectively for longer term needs the Council must look at adopting a plan of at least 15 years from the point of adoption.

Secondly, the Council's justification for the reduction is because it considers its proposals for the garden village to no longer be deliverable. The HBF does not generally comment on the deliverability or otherwise of sites in local plan but we do not consider it appropriate for plan periods to be adjusted in order to fit the sites the Council considers to be either deliverable or developable. If the Council does not consider a site to be suitable for allocation in the local plan, then it should look at how this shortfall can be addressed through the allocation of other sites.

Finally, we are concerned that the Council did not consider other options apart from reducing the plan period due to there being no other proposals for a garden village. There are likely to be other options for meeting housing needs across the plan period that the Council should have considered and appraised. Paragraph 47 of the NPPF enables local authorities to identify broad locations for development toward the end of a plan period and consideration could have been given to allocating further sites at sustainable settlements and indeed how new development could ensure settlements become more sustainable through improved service provision. The Council has moved to reduce its plan period as the first and only option once its preferred approach was not possible.

Therefore, in addition to underestimating housing needs for the Borough the Council have now adjusted their plan period in order to avoid making further strategic allocations that will meet needs in future. What is most disappointing is that the Council's decision ignores that fact that the Borough is part of the key growth corridor between Oxford, Milton Keynes and Cambridge. The improvements to infrastructure in this corridor are expected, as set out in the National Infrastructure Commitments report "Partnering for Prosperity", to be completed by 2030. This infrastructure is expected to unlock opportunities for transformational housing growth and as such Councils in this corridor must start planning for this growth now. This would be consistent with paragraph 157 of the NPPF which requires plans to take account of longer-term requirements. Reducing the plan period due to the Council's decision not to allocate the Colworth Garden village is not consistent with planning for longer term requirements and as such cannot be considered sound.

Conclusion

At present we do not consider the amendments to the plan proposed in this consultation to be sound, as measured against the tests of soundness set out in paragraph 182 of the NPPF. The Council should maintain the 2035 timeframe for the local plan and seek to allocate sufficient land to meet needs over this time frame, or at the very least identify broad locations for development in the last five years of the plan.

We hope these representations are of assistance in taking the plan forward to the next stage of plan preparation and examination. I would also like to express my interest in attending any relevant hearing sessions at the Examination in Public. Should you require any further clarification on the issues raised in this representation please contact me.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Mark Behrendt'.

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