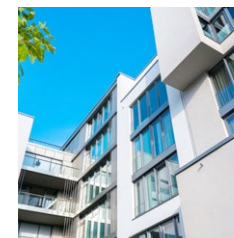
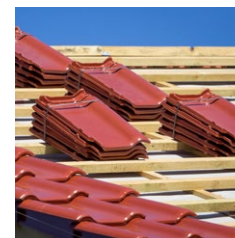


Housing Strategy Review



2016 - 2020



Foreword

This Housing Strategy Review builds on the Housing Strategy 2012-17 and extends it to 2020. This Review should be read in conjunction with the Housing Strategy 2012-17. The Review appears at a time of great pressure on the supply of housing and on the affordability of housing across the housing market. It also comes forward at a time of major changes in housing and planning law and financing.

The Housing Strategy Review considers the options for engagement, influence and direct action by the Council. The document recognises the seriousness of the challenge that the Council faces in seeking to address housing needs and seeks to address realistically the constraints and opportunities that exist, outlining a range of proposals which will come forward through specific reports and work streams that the Council will undertake.

Executive Summary

The Housing Strategy Review focusses on the housing supply and affordability challenges in Bedford Borough and the responses open to the Council:

a. Why a Review of the Housing Strategy? - Explains why the review is taking place and identifies the extension of the housing strategy to 2020;

b. Structure of the Housing Strategy - Sets out the four themes in the Housing Strategy and the documents that are now available or are in preparation and how they relate to the housing strategy themes:

- Theme 1: Housing needs and the housing market
- Theme 2: The provision of affordable housing and delivery of growth
- Theme 3: Making best use of the existing housing stock
- Theme 4: Homelessness and meeting the needs of vulnerable people

The Housing Strategy Review points to a range of documents covering these different themes, published or in preparation. This Housing Strategy Review focusses on key issues facing Bedford Borough in housing supply and affordability. It sets out constraints that the Council is facing and the options for the Council working in partnership with stakeholders in the Borough to address these major challenges.

c. National Strategic Context - Reviews national policy developments which have an impact on housing supply in Bedford Borough.

d. The Context - Update: The Population, Housing Needs and the Bedford Housing Market – Presents key data on the position in Bedford. It should be noted that the Strategic Housing Market Assessment represents a detailed review of the housing market in Bedford Borough and is not reproduced here.

e. Housing Delivery - Summarises out-turns in recent years in terms of delivery of both overall housing numbers and affordable housing.

f. Tenure and Affordability - Reviews the approach to the tenures offered within affordable housing in the light of the evidence from the Strategic Housing Market Assessment and the changes that are in place or proposed by Government.

g. Strategic Direction - Out of the previous review and commentary a series of bullet points identify strategic directions for the Council in response to the challenges that it faces; These key points are:

- a. Recognise that housing development in Bedford Borough will continue to be private sector lead development primarily targeted at owner-occupiers and that the continued support for access to the sector provided through mechanisms like Help to Buy is important to maintaining the delivery of new housing
- b. Support the development of the private rented sector in Bedford Borough and engage with it positively while continuing to use powers available to the Council to support high standards and tackle rogue landlords

- c. Respond positively to changes to the planning system to support the increased opportunities and flexibilities to deliver new housing. A proactive response will place the Council in the best position to shape the development to meet the needs of the community
 - d. Bring forward a mixed range of schemes that include urban schemes, sustainable urban extensions and schemes in the more sustainable villages.
 - e. Support the development of self-build and custom build schemes which can facilitate local small and medium size enterprises and a broader range of sites.
 - f. Recognise that only viable schemes will deliver affordable housing. This means that schemes must be large enough to generate an affordable housing requirement, in areas with values that will support the delivery of affordable housing, and free of infrastructure requirements which will undermine the viability of the schemes
 - g. Recognise that with limited Government funding housing associations will be more cautious about development commitments and the creation of a positive environment to support that investment is essential.
 - h. Identify land in the Council's ownership and work with other public agencies to deliver additional land for housing and to bring forward schemes. Use the Council's land assets to support the delivery of housing, particularly affordable housing.
 - i. Consider direct engagement in bringing forward housing developments through new investment vehicles created by the Council or in partnership
 - j. Continue to address long-term empty properties.
 - k. Identify previously developed land and buildings that could be made available for residential use and work proactively to address the challenges in bringing them back into use.
 - l. Support the development of master-planning for areas of growth including areas identified in the Town Centre Area Action Plan. Consider the development of delivery mechanisms in relation to these proposals and the potential use of compulsory purchase powers.
 - m. Identify the most effective ways in which changes to the mix of accommodation available can meet the needs of those who need care and support.
- h. Maintaining Housing Delivery** - The next sections identify the sites and the progress that are the focus of current work by private sector developers, Registered providers, and the Council to deliver the housing that is needed. The sites are divided into:
- Sustainable Urban Extensions and New Settlements;
 - Urban Sites;
 - Rural Housing;
 - Supported Housing.
- i. Options to Increase Housing Delivery** - The next sections look at options for initiatives that the Council could investigate and potentially undertake to increase housing delivery. The options are considered under the following sections:
- Resources;
 - The Planning System;
 - Housing Company;
 - Empty Homes;
 - Self-Build and Custom Build Housing.

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1. Introduction: Why a Review of the Housing Strategy?

- 1.1 The Housing Strategy 2012-17 committed the Council to a review of housing targets in 2015. The Council has taken the opportunity to review some of the key elements of the Housing Strategy and to clarify the relationship with other housing related strategies. There is no change in direction proposed but the Housing Strategy Review reflects changes in legislation since 2012. The Housing Strategy Review considers the options for engagement, influence and direct action by the Council. To manage resources effectively it is proposed that the Housing Strategy Review will lead to the extension of the life of the Housing Strategy by three years to 2020.

2. Structure of the Housing Strategy

- 2.1 The starting point of the Housing Strategy Review is to consider the structure of the Housing Strategy. This is to reflect:
- i. The need to use resources efficiently. Strategies play a key role in optimising the use of resources but strategy development itself requires resources which must be used as efficiently as possible.
 - ii. Increasingly stakeholders and members of the public access data about Council strategies through the internet; a series of linked documents is an effective approach compared to a single hard-copy document.
 - iii. A series of linked documents allows the updating of elements of the strategy reflecting priorities that emerge as a result of changes in the operating environment and policy considerations.

- 2.2 The Housing Strategy 2012-17 contained four themes:
- Theme 1: Housing needs and the housing market.
 - Theme 2: The provision of affordable housing and delivery of growth.
 - Theme 3: Making best use of the existing housing stock.
 - Theme 4: Homelessness and meeting the needs of vulnerable people.
- 2.3 These themes set out in the Housing Strategy have been developed in further documents which have either been published or are in preparation:
- a. Bedford Borough Population, the Housing Market and Housing Needs (Theme 1)
The Council has produced a Strategic Housing Market Assessment as part of the preparations for the Local Plan 2012 – 2035. The Review takes note of the findings of this study and the key implications for the development of the Council's Housing Strategy.
 - b. The provision of affordable housing and delivery of growth (Theme 2)
The Council recognises that delivering the required housing of all tenures is a challenge and delivering affordable rented housing is, for a number of reasons, a particularly acute challenge.
 - c. Supporting the Private Rented Sector (Theme 3)
The Council is currently developing a Private Sector Housing Strategy to be published in 2016.

- d. Bringing Empty Homes Back Into Use (Theme 3)
The Council has published an Empty Homes Strategy 2011 - 2016.
- e. Managing social housing tenancies (Theme 3)
The Council has published a Tenancy Strategy 2013 - 17. The Tenancy Strategy applies to social housing. A review of the operation of the Tenancy Strategy is carried out annually alongside the review of the Allocations Scheme.
- f. Homelessness Strategy (Theme 4)
A Homelessness Strategy is in preparation and will be submitted to Executive in June 2016.
- g. Travellers and Travelling Show People (Theme 4)
A Travellers and Travelling Show People Accommodation Assessment was published in 2012 and the Council's strategy for meeting the identified need was set out in the Allocations and Designations Local Plan 2013. A new Travellers and Travelling Show People Accommodation Assessment is in preparation. This will lead to a strategy to meet the identified need which will be developed in conjunction with the Local Plan 2035.

- h. Older Persons Accommodation Strategy (Theme 4)
The Older Persons Accommodation Strategy 2011-2016 will require review in 2016. Older people are also a large enough demographic for the Strategic Housing Market Assessment to generate significant findings.
- i. Care and Support Accommodation Strategy (Theme 4)
The Housing Chapter of the Joint Strategic Needs Assessment addresses housing and care issues. Further work on care and support accommodation strategy is in progress.

- 2.4 The Action Plan in the Housing Strategy 2012-17 is replaced by a new Action Plan with updated objectives including work on further strategy documents to take forward and update other elements of the Housing Strategy. The Housing Strategy 2012-17, less the superseded Action Plan is retained as an appendix to this Housing Strategy Review.

3. National Strategic Context

- 3.1 The Government published “Laying the foundations: a housing strategy for England” in November 2011. There has been significant policy development since that time but, addressing the question of whether there would be a new national housing strategy, the Sunday Times reported (16 August 2015)

Will they get it? No, says Brandon Lewis, the housing minister, as the Conservatives today mark their 100th day in power. “I’m not entirely convinced that publishing a strategy actually achieves what we want....The outcome I’m looking for is to deliver homes.”¹

- 3.2 Since the publication of the national and local housing strategies in 2011/2012 the Government has launched Help to Buy which is programmed to run from 2013 to 2020 at a cost of £23.8bn. Prices have risen 18.3% since its introduction.²

House price increases and the assistance to borrowers has created a stronger market for builders, which has encouraged supply. The scheme offers households in the private rented sector a route into home ownership, which could reduce their need for other help in the future although there remains a concern about affordability when interest rates rise.

¹ http://www.thesundaytimes.co.uk/sto/style/homes_and_gardens/My_Place/article1593358.ece (Sunday Times 16/8/15 - Accessed 7/9/15)

² <http://www.ft.com/cms/s/0/ad851b70-fd76-11e4-b824-00144feabdc0.html#slide0> (Financial Times 1/6/15 – Accessed 8/9/15).

- 3.3 A significant trend is the growing concentration of the development industry in the hand of a small number of major companies. 107,820 homes were completed in England and Wales in 2012/13. In that year the top ten house builders completed 48,773 homes.³

- 3.4 In the last 25 years, the number of firms building between 1 and 100 units has fallen from over 12,000 to fewer than 3000.⁴

Significant numbers of small and medium size developers were lost in the recession. Local Examples include Relmfield, Deejak, McCann Homes, Amberley Homes and Crestel Partnerships. The Government has announced an investment fund to support small housebuilders. The commitment to self-build and custom build is also intended to partially redress this but starts from a low base. The Self-build Housing Market Report – UK 2014-2018 Analysis estimates that self-build completions in 2013 reached around 10,630 (less than the number delivered by the leading house builder - Barrett Developments - alone) – equivalent to almost 8% of total completions and 10% of private sector completions.⁵

³ <http://www.hbf.co.uk/media-centre/facts-statistics/> (House Builders Federation – Accessed 9/9/15).

⁴ <https://www.gov.uk/Government/news/100-million-boost-for-small-housebuilders>, 6 July 2015, accessed 17/09/15).

⁵ <http://researchbriefings.files.parliament.uk/documents/SN06784/SN06784.pdf> (House of Commons Briefing Paper 15 June 2015 – Accessed 9/9/15).

The Government has indicated that it intends to take further steps to support custom and self build.

- 3.5 A second factor of enduring significance is the availability and cost of development land. A Shelter report noted as follows: “Land is the primary input into house building, but the unique features of the land market have been poorly understood. The primary consequence of the inherent scarcity and permanence of land, accentuated by the planning system and amplified by the financial system, is that land values tend to rise over time. The gain in value that planning permission delivers is generally very high, encouraging strategic land trading, rather than development and also resulting in the most profitable beneficiaries of residential development being the land owner – not the developers, the community or central or local Government.”¹

¹ http://www.shelter.org.uk/_data/assets/pdf_file/0019/802270/Building_the_homes_we_need_-_a_programme_for_the_2015_Government.pdf (Shelter 2015 - Accessed 8/9/15)

- 3.6 The Government is making efforts to secure the release of surplus public sector land. It is making changes to the planning system designed to increase the amount of land and buildings in other uses that can be switched to residential use. The planning system remains a key focus for Government. Since the introduction of the National Planning Policy Framework a series of regulatory changes have been introduced aimed at making development easier and more profitable. It has placed viability assessments at the centre of the planning system. It is unlikely that liberalisation of the planning system or the release of public sector land will take the pressure off the land market to fundamentally change the way in which value is distributed between land owner, developer, Government and community.

- 3.7 A third major trend is the continuing growth of the private rented sector. Four million homes are now privately rented in England, accounting for 18 per cent of all households. The sector has doubled in size since 1989 and contains more households now than social housing.²

- 3.8 the Government has introduced a £1bn Build to Rent fund to create 10,000 private rented homes and reports progress on 15 schemes that will create 4,000 homes.³

² <http://www.civitas.org.uk/pdf/thefutureofprivaterenting> (Civitas January 2015 - Accessed 9/9/15)

³ <https://www.gov.uk/Government/speeches/brandon-lewis-speech-to-the-resi-housing-conference> Brandon Lewis, Housing Minister 9/9/15 – Accessed 9/9/15).

The Housing Minister noted that the Government is considering proposals to tackle the minority of landlords that offer a poor service “that include a blacklist of rogue landlords and letting agents, banning orders for the worst offenders, extending Rent Repayment Orders to cover poor property conditions and illegal eviction, and the introduction of civil penalties.”

3.9 An important element in the Government’s approach to promoting new housing development has been the introduction of New Homes Bonus. Between 2011-12 and 2014-15 Bedford Borough Council received an additional £9.58m as a result of New Homes Bonus. This is the ninth highest figure out of 55 unitary authorities and amounts to 36% of total settlement (grant) funding.¹

3.10 Changes in planning regulations have had a major impact including changes to the use of viability appraisals in assessing S106 contributions, office conversions to residential use carried out under permitted development rights which incur no affordable housing obligations and changes to provisions for previously developed land.

¹ <http://www.lgcplus.com/news/finance/exclusive-scale-of-reliance-on-new-homes-bonus-payments-revealed/5078146.article> (Local Government Chronicle 16 January 2015 – Accessed 17/9/15)

3.11 The Elphicke-House Report called for the development of the role of Local Authorities as housing delivery enablers which ‘take responsibility for making development happen in their area rather than purely determining housing need and determining planning permissions – to create a culture of housebuilding’.²

3.12 The Report identified five key areas in developing a dynamic delivery approach to enabling housing development:

- i. Community leadership and strategic clarity
- ii. Creating housing opportunity
- iii. Business leadership
- iv. Management of housing supply
- v. Shaping a stronger housing finance market

3.13 What is clear is that nationally there is a likely to be continued strong support for owner-occupation but the future policy on affordable housing, is less certain. Funding for social housebuilding has fallen from £2,3bn to £1.1bn per year.³

² https://www.gov.uk/Government/uploads/system/uploads/attachment_data/file/398829/150126_LA_Housing_Review_Report_FINAL.pdf (January 2015 - Accessed 11/9/15)

³ <http://www.ft.com/cms/s/0/ad851b70-fd76-11e4-b824-00144feabdc0.html#slide0> (Financial Times 1/6/15 – Accessed 8/9/15).

The Government's intention was that the shortfall should be made up by greater borrowing against higher rents. Concerns about the impact on the welfare bill always limited the extent of the introduction of affordable rents. The Government has now reversed long-term social rent policy. In place of the previous regime of CPI plus 1% rents for the next four years are to be reduced by 1% per year.

The reduction in funding prompted by Government budgetary constraints has prompted Government to oppose the use of subsidy (including recycled grant held by housing associations as well as new grant) to support affordable housing in combination with developer contributions. This combination had been an important factor in delivering affordable housing in Bedford Borough. Where the S106 requirement for affordable housing has been reduced due to viability constraints developers have shown very little interest in providing affordable housing voluntarily with the help of grant. Competition for land will continue to favour private development with values being neither high enough to generate high levels of cross-subsidy or low enough for land-owners and developers to welcome affordable housing. Following unitary reorganisation the Council only has very small sums available from the Capital Programme. These funds are used to encourage development and to support key schemes like 1 – 4 St Pauls Square. The funds available are not large enough to make a major impact on the overall provision.

- 3.14 The withdrawal of grant was predicated on Government's expectation that in future Housing Associations would generate their own funding. In so far as they are able to do this housing associations are likely to focus on areas with strong underlying capital values which will support future investment. The extension of the Right to Buy to Housing Association tenants creates uncertainty for Housing Associations and funders. The budget announcement of July 2015 reducing social sector rents by 1% pa has a more immediate impact on the ability of Housing Associations to finance new development.
- 3.15 The Government said the change means a 12 per cent reduction in average rents by 2020/21 and 'will allow social landlords to play their part in reducing the welfare bill'. The Government estimates associations' rental income will be reduced by £1.6bn in 2020/21. Genesis (a major association with 33,000 homes which is not currently developing in Bedford Borough but has in recent years worked with developers in bring forward affordable homes at the former BT Tower and Britannia Works developments) has announced that it will no longer enter new agreements develop homes for social or affordable rent.
- 3.16 Nearly one in three (31.9%) of 135 chief executives to respond to an Inside Housing survey said that their organisation is likely to stop entering new agreements to build homes for sub-market rent, with 11.1% of overall respondents saying it was "extremely likely". More than half (53%) of 132 executives said it was likely their associations would renegotiate their existing agreements to build homes for sub-market rent. ¹

¹ <http://www.insidehousing.co.uk/analysis-and-data/data/changing-the-mix/7012193.article?adfsuccess=1> (Inside Housing 16/10/2015 - Accessed 21/10/2015)

- 3.17 Local Housing Associations are reviewing their business plans and development strategies. It is likely that most associations will seek to continue to deliver sub-market rent but the volume will be reduced and the need to focus on market developments and low cost home ownership to generate cross-subsidies will be increased.
- 3.18 Even where Housing Associations do proceed with a programme, albeit reduced, there will be delays as business plans and scheme finances are reappraised. Registered Providers may seek to defer or reduce the affordable rented (as opposed to shared ownership) element of new schemes. The changes may cause reductions in offers from Registered Providers when they partner with house-builders and this may lead to further reductions in the quantum of affordable housing as a result of revised viability assessments.
- 3.19 Two flagship housing policies appeared in the 2015 Conservative Manifesto:
- 200,000 new homes for first-time buyers
 - 800,000 housing association tenants will be able to qualify for a full right to buy discount ¹
- 3.20 The delivery mechanisms for these policies are being developed through legislation and guidance.
- 3.21 Many housing associations are charities. The House of Lords voted in July 2015 by 257 votes to 174 in favour of an amendment to the Housing Bill which would prevent charities being “compelled to use or dispose of their assets in a way which is inconsistent with their charitable purposes”. Lord Kerslake, who was previously Chief Executive of the HCA and Permanent Secretary at DCLG said in the House of Lords debate that it would be “a major disincentive to charitable benefactors ... to donate their money or land to good causes when the Government can directly intervene and direct the sale of those assets for very different purposes”. ²
- 3.22 The Office of National Statistics has determined that housing associations should be reclassified as public bodies - bringing more than £60bn of debt onto the national balance sheet. This review is an analysis of the level of Government control of housing association businesses, based on European accounting rules. The Government is considering regulatory changes with the aim of reversing this ruling.

¹ <http://www.telegraph.co.uk/news/politics/11533937/General-Election-2015-an-at-a-glance-guide-to-key-pledges-in-Conservatives-manifesto.html> (Daily Telegraph 13/4/15 - Accessed 7/9/15)

² <https://www.estateagenttoday.co.uk/breaking-news/2015/7/latest-right-to-buy-idea-may-be-watered-down> (Estate Agent Today 22/7/15 – Accessed 8/9/15)

- 3.23 Recognising these difficulties, the Government has negotiated a voluntary agreement with the Housing Associations. The Housing and Planning Act does not contain a statutory Right to Buy applied to Housing Association properties but it does contain provisions requiring Local Authorities with Housing Revenue Accounts (this does not include Bedford Borough) to dispose of high value social housing stock which becomes vacant. Over time the sale of Housing Association properties under the voluntary Right to Buy scheme could reduce supply as the re-lets that would have become available are lost to the affordable rented sector.
- 3.24 On 10 August 2015 the Communities Secretary announced a £26m scheme aimed for demonstration schemes brought forward by housebuilders and identified the following steps that the Government has taken, or intends to take, to support the starter homes initiative.¹

¹ <https://www.gov.uk/Government/news/greg-clark-gives-starter-home-boost-to-first-time-buyers> (CLG 10.8.15 - Accessed 8/9/15)

- Requiring local authorities to plan proactively for the delivery of starter homes.
- Maximising the release of underused previously developed land to be used for starter homes.
- Enabling communities to allocate land for the properties through their neighbourhood plans.
- Bringing forward proposals to ensure every reasonably sized housing site includes a proportion of starter homes.
- Promoting starter homes by bringing forward regulations that would exempt developers from levies that are sought when building homes, such as the Community Infrastructure Levy.
- Monitoring how effective local authorities are in delivering starter homes developments.

4. The Housing and Planning Act and Starter Homes

4.1 The Housing and Planning Bill was given Royal Assent on 12th May 2016.¹

The Government's core objectives in bringing forward this legislation are increasing the output of new build homes, and improving the affordability of home ownership for first time buyers (FTB). The Government aims to achieve these objectives by changes to planning regulations and the creation of 'Starter Homes' for FTBs with values set at 80% of market value. The government's stated intention is to deliver 200,000 Starter Homes in the life of the parliament.

Summary of housing measures:

- Starter homes introduced as an affordable housing category on new build developments
- Starter homes will be available to FTBs at a 20% discount off market value, subject to value caps
- Provisions requiring councils to consider the sale of vacant council housing
- Extension of Right to Buy to housing associations
- Introduction of a data base of rogue landlords & property agents with powers to ban repeat offenders and other measures

¹ <http://services.parliament.uk/bills/2015-16/housingandplanning/documents.html>

- Agents to keep client's money in accounts separate to business accounts
- Local Authorities to grant planning permission on serviced plots, sufficient to meet the demand for self-build housing in their area

Summary of planning measures:

- 'Planning permission in principle' (PPIP) may be granted automatically, subject to adoption of key qualifying documents such as a development plan
- Councils to compile and maintain registers of brownfields land, which may also be 'qualifying documents' for PPIP purposes
- Enhanced powers for community liaison groups in local plan preparation and examination
- Secretary of State power to intervene in neighbourhood planning
- Starter homes to be delivered on all 'reasonably-sized' sites
- Planning permission granted for homes in some circumstances under the Nationally Significant Infrastructure Projects regime

4.2 The Housing and Planning Act defines starter homes as new dwellings for first time buyers under 40, sold at a discount of at least 20% of market value and at less than the price cap of £250,000 (or £450,000 in London).

4.3 The Government published in December 2015 a Consultation Document: "Consultation on proposed changes to national planning policy".

4.4 The Consultation document proposes a change to the definition of affordable housing. The current affordable housing definition includes some low cost home ownership models, such as shared ownership and shared equity, provided that they are subject to 'in perpetuity' restrictions or the subsidy is recycled for alternative affordable housing provision. The Government proposes to amend the definition to "include products that are analogous to low cost market housing or intermediate rent, such as discount market sales or innovative rent to buy housing. Some of these products may not be subject to 'in perpetuity' restrictions or have recycled subsidy."

4.5 This Consultation document includes a range of measures aimed at promoting the use of brownfield land for starter homes. The Consultation document says:

"National planning policy contains an exception site planning policy to release land specifically for starter homes. This allows applicants to bring forward proposals on unviable or underused commercial or industrial brownfield land not currently identified in the Local Plan for housing.....We want to ensure that unviable or underused commercial and employment land is released under the exception site policy for starter homes. We propose to amend paragraph 22 of the Framework to make clear that unviable or underused employment land should be released unless there is significant and compelling evidence to justify why such land should be retained for employment use....."

Alongside these proposals, we propose to widen the scope of the current exception site policy for starter homes to incorporate other forms of unviable or underused brownfield land, such as land which was previously in use for retail, leisure and non-residential institutional uses (such as former health and educational sites).....

To ensure there is greater certainty that planning permission will be granted for suitable proposals for starter homes on exception sites, we propose to be clearer about the grounds on which development might be refused, and to ensure that this is fully embedded in national planning policy. Specifically, we propose to amend the exception site policy to make it clearer that planning applications can only be rejected if there are overriding design, infrastructure and local environmental (such as flood risk) considerations that cannot be mitigated.....

In cases where existing mixed use commercial developments contain unlet commercial units, we consider that where appropriate they could usefully be converted to housing including as starter homes. There would need to be clear evidence that the unit has remained unlet for a reasonable period or there is little likelihood of the unit being let for a commercial use

We propose that starter homes on rural exception sites should be subject to the same minimum time limits on resale (5 years) as other starter homes to ensure local people are able to maximise the value of the home and secure a long term place in the local housing market. However, we also propose that local planning authorities would, exceptionally, have the flexibility to require a local connection test.

This would reflect the particular needs of some rural areas where local connections are important and access to the housing market for working people can be difficult and would be consistent with existing policy on rural exception sites.....

We consider that the current policy can hinder locally-led housing development and propose to amend national planning policy so that neighbourhood plans can allocate appropriate small-scale sites in the Green Belt specifically for starter homes, with neighbourhood areas having the discretion to determine the scope of a small-scale site.....

We propose to change policy to support the regeneration of previously developed brownfield sites in the Green Belt by allowing them to be developed in the same way as other brownfield land, providing this contributes to the delivery of starter homes, and subject to local consultation.”

- 4.6 The Government published a further consultation document in March 2016: starter homes Regulations Technical consultation. The consultation document sets out proposals for requiring starter homes within the planning system. The Consultation document says:

“We propose that the starter homes requirement applies to sites which meet at least one of the following criteria: 10 units or more or 0.5 or more hectares....

we propose....a single national minimum requirement of 20% of all homes delivered as part of residential developments

We propose a general exemption to the starter homes requirement for those residential developments where it can be clearly demonstrated that the starter homes requirement would render the site unviable....

We propose that the requirement should not apply to dedicated supported housing which provides specialist accommodation for a particular group and which includes an element of support, such as residential care homes”

- 4.7 The document considers the potential exclusion of some other types of scheme. This may not be a complete exclusion but may involve the payment of a commuted sum. The types of scheme that could be affected by this are:

- i. Estate regeneration schemes and other affordable housing led developments where the Government is concerned about viability and the potential impact on public subsidy.
- ii. Student housing.
- iii. Custom build development.
- iv. Purpose built private rented housing for institutional investment.

- 4.8 The focus on starter homes, and particularly a requirement for delivery of starter homes set as high as 20%, will have a serious effect on the delivery of other affordable tenures – particularly affordable rented housing through S106 agreements. There could also be a further impact through a refocussing of housing association activity as well. ¹

¹ <http://www.insidehousing.co.uk/policy/right-to-buy/housing-bill-will-be-introduced-in-october/7011685.article> (Inside Housing 9/9/15 – Accessed 10/9/15).

- 4.9 The affordability of starter homes has been analysed in a Shelter report by household composition and income. For single people only the highest earners (90th percentile) will be able to afford them. For families with one full time and one part time worker this extends to higher than average earners (70th percentile). For dual income households without children households on median incomes could find the homes affordable. No households on the National Living Wage will find the starter homes affordable. ²

² http://england.shelter.org.uk/__data/assets/pdf_file/0011/1183790/Starter_Homes_FINAL_w_Appendix_v2.pdf (Shelter August 2015 - Accessed 10/9/15)

5. The Context – Update: The Population, Housing Needs and the Bedford Borough Housing Market

- 5.1 Bedford Borough is a unitary authority which has a mix of both urban and rural areas comprising the urban area of Bedford and Kempston and 45 rural parishes.
- 5.2 The population of the Borough is estimated as 163,900, (Office for National Statistics (ONS) mid 2014). This represents an increase of 11% from figure of 148,100 in mid-2001.
- 5.3 The Strategic Housing Market Assessment considers the population data and projections at length.

It concludes:

3.98 ORS have reviewed and assessed household projections as part of this study; the key scenario, that which uses 10-year migration trends (based on information from the Census for the period 2001-11) show household numbers across the study area would increase by an average of 700 per year over the 20-year period 2012-32. Nevertheless, it is likely that the 2011 Census under-enumerated the population for Bedford Borough by around 4,000 persons. This increases the baseline population and average household size in 2012, but more importantly, it also increases the rate of population growth that is attributed to migration. Adjusting the population trends to take account of this issue suggests an increase of 826 households each year, notably higher than the estimate previously derived based on official population data (700 p.a.).

3.99 The long-term migration trends based on the intercensal period provide the most robust and reliable basis for projecting

the future population, and therefore the projected increase of 16,526 households over the 20-year period 2012-32 (an average of 826 per year) provides the most appropriate demographic projection on which to base the OAN for housing. On the basis of this household growth, we can conclude that there is a need for 17,038 additional dwellings in Bedford Borough over the 20-year period 2012-32. ONS estimates that the total population of the Borough will rise by a further 7% between 2014 and 2021 to a total of 174,700.¹

- 5.4 The Borough has seen significant international in-migration. National Insurance Number registrations were issued to 21,518 overseas nationals resident in Bedford Borough between 2002 and 2014.
- 5.5 Bedford Borough is one of the 48 authorities in the Eastern Region and, after Luton, has one of the highest minority ethnic population in the Eastern Region with census data from 2011 showing up to 100 different ethnic groups represented within its boundaries. 28.5% of Bedford Borough's population is from Black and Minority Ethnic (BME) groups compared to 20.2% in England and 14.7% in the East of England. The main BME groups in the Borough are White Other (which includes large Italian and Polish communities) and Indian. There are also substantial populations of Black African, Black Caribbean, Bangladeshi, Pakistani, White Irish and mixed White and Black Caribbean.
- 5.6 For populations in 15 of the 17 minority ethnic groupings the Borough ranks in the Top 100 of 348 English local authorities. The two exceptions are Gypsy or Irish Travellers and Chinese ethnic groups.

¹ http://www.bedford.gov.uk/housing/housing_development_and_policy.aspx

Figure 1: Ethnic Composition of Bedford Borough in 2011

Ethnic Group	Ethnic Group Category	Bedford Borough		England	East
		Number	%	%	%
All usual residents		157,479			
White	British	112,588	71.5	79.8*	85.3
	Irish	1,683	1.1	1.0	1.0
	Gypsy or Irish Traveller	115	0.1	0.1	0.4
	Other White	12,460	7.9	4.6	4.5
Total White Population		126,846	80.6	85.5	91.2
Mixed/multiple ethnic groups	White and Black Caribbean	2,396	1.5	0.8	0.6
	White and Black African	587	0.4	0.3	0.3
	White and Asian	1,366	0.9	0.6	0.6
	Other Mixed	1,037	0.7	0.5	0.5
Total Mixed Population		5,386	3.5	2.2	2.0
Asian/Asian British	Indian	8,122	5.2	2.6	1.5
	Pakistani	3,270	2.1	2.1	1.1
	Bangladeshi	3,225	2.0	0.8	0.6
	Chinese	905	0.6	0.7	0.6
	Other Asian	2,410	1.5	1.5	1.0
Total Asian/Asian British Population		17,932	11.4	7.7	4.8
Black/African/Caribbean/Black British	African	2,741	1.7	1.8	1.2
	Caribbean	2,843	1.8	1.1	0.6
	Other Black	618	0.4	0.5	0.2
Total Black/Black British Population		6202	3.9	3.4	2.0
Other ethnic group	Arab	331	0.2	0.4	0.2
	Any other ethnic group	782	0.5	0.6	0.3
Total Other Population		1,113	0.7	1.0	0.5

Source: ONS, 2011 Census, Table KS201EW. © Crown Copyright 2012 * Excluding London Boroughs, 86.1% of the England population is White BAt October 2014 there were 1,056 applicants on the Housing Register. The Register is only open to applicants with a Qualifying Housing Need (see definition at Glossary).

5.7 A breakdown of affordable housing lettings in Bedford Borough by ethnicity for 2013/14 is given in figure 2 below:

Figure 2: Affordable Housing Lettings by Ethnicity in Bedford Borough 2013/14

Ethnic Group	Total	%
Asian/Asian British-Bangladesh	15	2.54
Asian/Asian British-Indian	8	1.35
Asian/Asian British-Other	6	1.02
Asian/Asian British-Pakistani	9	1.52
Black/Black British-African	25	4.23
Black/Black British-Caribbean	20	3.38
Black/Black British-Other	2	0.34
Chinese	2	0.34
Ethnic Origin not given	32	5.41
Mixed - Other	3	0.51
Mixed - White & Asian	2	0.34
Mixed - White & Black African	4	0.68
Mixed - White & Black Caribbean	16	2.71
Other ethnic group	1	0.17
Other ethnic group - Arab	1	0.17
White - British	367	62.10
White - Irish	6	1.02
White - Other	72	12.18
Gypsy and Traveller	3	0.51
Total	591	100

Figure 3: The distribution of Ethnic Groups by Tenure

	Bedford Borough			England	Bedford Borough			England	Bedford Borough			England
	Number of Households Bedford Borough	Social Rented	% Social Rented	% Social Rented	Private rented or living rent free	% Private rented or living rent free	% Private rented or living rent free	Owner Occupier	% Owner Occupier	% Owner Occupier		
All Households	63,812	10,252	16.1	17.7	10,958	17.2	18.2	42,602	66.8	64.1		
Ethnic Group												
White: Total	54,797	8,171	14.9	16.8	8,885	16.2	16.9	37,741	68.9	66.4		
English/Welsh/Scottish/Northern Irish/British	48,881	7,216	14.8	16.9	7,002	14.3	15.1	34,663	70.9	68.0		
Irish	928	187	20.2	21.9	135	14.5	16.7	606	65.3	61.4		
Gypsy or Irish Traveller	46	31	67.4	41.9	8	17.4	24.6	7	15.2	33.5		
Other White	4,942	737	14.9	11.8	1,740	35.2	51.3	2,465	49.9	36.9		
Mixed/multiple ethnic group: Total	1,070	365	34.1	32.1	307	28.7	31.4	398	37.2	36.5		
White and Black Caribbean	495	241	48.7	43.3	126	25.5	26.0	128	25.9	30.7		
White and Black African	124	42	33.9	36.7	53	42.7	35.3	29	23.4	28.1		
White and Asian	210	26	12.4	19.5	55	26.2	32.4	129	61.4	48.1		
Other Mixed	241	56	23.2	25.8	73	30.3	36.1	112	46.5	38.1		
Asian/Asian British: Total	5,014	777	15.5	13.6	1,021	20.4	28.3	3,216	64.1	58.1		
Indian	2,472	218	8.8	7.4	357	14.4	23.8	1,897	76.7	68.8		
Pakistani	814	130	16.0	13.3	164	20.1	23.7	520	63.9	63.1		
Bangladeshi	681	302	44.3	35.4	120	17.6	22.0	259	38.0	42.6		
Chinese	303	11	3.6	11.3	129	42.6	37.8	163	53.8	50.9		
Other Asian	744	116	15.6	17.1	251	33.7	38.7	377	50.7	44.2		
Black/African/Caribbean/Black British: Total	2,542	873	34.3	42.0	604	23.8	25.0	1,065	41.9	33.0		
African	909	311	34.2	42.4	382	42.0	33.8	216	23.8	23.8		
Caribbean	1,413	476	33.7	39.7	183	13.0	14.8	754	53.4	45.5		
Other Black	220	86	39.1	47.8	39	17.7	24.5	95	43.2	27.7		
Other ethnic group: Total	389	66	17.0	25.7	141	36.2	40.7	182	46.8	33.6		
Arab	126	27	21.4	24.3	71	56.3	49.1	28	22.2	26.6		
Any other ethnic group	263	39	14.8	26.7	70	26.6	35.2	154	58.6	38.1		

Source: ONS Crown Copyright Reserved (from Nomis on 14 September 2015)

- 5.8 Figure 3 shows the distribution of different ethnic groups by tenure. It will be noted that there are significant variations between ethnic groups both at local and national level and that the variations are broadly consistent
- 5.9 Real house prices (adjusted to take account of the impact of inflation) across Bedford Borough increased substantially in the period 2001-2005 (from £81,200 to £154,000 at 2012 values, a real increase of 90%), and prices continued to rise to a peak of £168,800 by the end of 2007. Average values reduced to £137,200 by the start of 2010 and have largely plateaued since that time (Bedford Strategic Housing Market Assessment 2015).
- 5.10 The ratio of lower quartile house prices to lower quartile earnings rose from 4.9 in 2001 to 8.0 in 2008. This declined slightly to 7.23 in 2013 but the significant increase between 2001 and 2008 is still apparent. The ratio is substantially higher than the long term averages of 3.5 – 4.5. These underlying pressures on affordability have an impact on levels of homelessness as those who might otherwise have bought properties turn to the Private Rented Sector.
- 5.11 There has been a significant increase in the Private Rented Sector households from 5,921 (9.8% of all dwellings) in 2001 to 10,110 (15.9%) in 2011, reflecting the growth in the number of buy-to-let properties, higher purchase costs and difficulties in securing mortgages, (Source ONS, 2011 Census, Table KS402EW). Statistics from the Valuation Office Agency for 2013 / 2014 show average private sector rents in the Borough to be in advance of Housing Benefit levels for all property sizes with the exception of studio flats, reducing the accessibility of this sector for households who are not working or are on a low income. This increases the need for affordable housing.
- 5.12 At 2011 the Social Rented sector accommodated 10,252 households, (16.1%), only 142 more than the Private Rented Sector, (Source ONS, 2011 Census, Table KS402EW). Total Registered Provider stock increased from 10,117 in 2001 to 11,098 in 2011 and further to 11,846 in 2014.
- 5.13 The Council has published a Strategic Housing Market Assessment to 2032. This forms part of the evidence base for the Local Plan 2035. Further work will be required to extend the Strategic Housing Market Assessment to cover the additional three years. Objectively Assessed Need for Bedford: An evidence base for establishing overall housing need was published in April 2015.¹
- 5.14 The adjusted finding of the SHMA which appears at Paragraph 5.97 is:
- the number of households in the Borough is likely to increase by 17,148 households over the 20-year Plan period 2012-32. This adjustment responds to identified un-met need for affordable housing, addresses suppressed household formation rates and takes account of the future Extra Care housing. Providing for an increase of 17,148 households yields a baseline housing need of 17,672 dwellings; an average of 884 dwellings per year over the 20-year Plan period 2012-32.
- 5.15 This total could be subject to further adjustment as a result of the Duty to Co-operate with other Local Authorities but it is unlikely to be reduced.

¹ http://www.bedford.gov.uk/housing/housing_development_and_policy.aspx.

- 5.16 The affordable housing requirement for the period 2012 - 2032 will be 5,110 dwellings (29.4% of the total dwellings required). This requires the provision of an average of 256 dwellings per year. There is a possibility that this could increase as a result of increased requirements arising through the Duty to Co-operate.

The Housing Strategy 2012-17 says at Paragraph 4.39:

We will maintain the target at 200 affordable homes per year for three years and review the target in the light of the operation of the Affordable Rent regime in practice and the significant reduction in grant funding from the Homes and Communities Agency (HCA).



6. Housing Delivery

Figure 4: Housing Delivery 2005/6-2014/15

Year	
2005/6	466
2006/7	456
2007-8	631
2008/9	407
2009/10	466
2010/11	634
2011/12	919
2012/13	654
2013/14	997
2014/15	828
Total	6498

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- 6.1 Figure 4 shows housing completions over the previous 10 years. Overall housing completions have performed better in the second five year period than in the earlier period. From 2005/6 to 2009/10 housing completions remained below 500 in all but one year. From 2010/11 housing completions have not fallen below 600. The average in the first five years was 485 per year. The average in the second five year period was 814 per year. This still falls short of the objectively assessed need of 884 dwellings identified in the Strategic Housing Market Assessment.

- 6.2 Figure 5 shows total forecast housing completions for the period covered by this review:

Figure 5: Forecast Total Housing Completions

Year	
2016/17	1,220
2017/18	1,441
2018/19	1,341
2019/20	1,122
2020/21	1,037

Source: 5 Year Supply of deliverable Housing Sites 2015/16 – 2020-21, Bedford Borough Council

A detailed breakdown of the projections by scheme is contained in Appendix 3 to the Council's 5 year supply. ¹

¹ http://www.bedford.gov.uk/environment_and_planning/planning_town_and_country/planning_policy_its_purpose/monitoring.aspx.

Figure 6: Affordable Housing Delivery 2005/6 – 2014/15

Year	2005/6	2006/7	2007/8	2008/9	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	TOTAL	AVE
All completions*	466	456	631	407	466	634	919	654	997	828	6458	646
Affordable Housing **	250	70	230	290	350	410	300	220	250	160	2520	252
Affordable Housing as Percentage of Total Completions	53.6%	15.4%	36.5%	71.3%	75.1%	64.7%	32.6%	33.6%	25.1%	18.1%	N/A	39.0%

* Bedford Borough Council Annual Monitoring Report

** CLG Live Table 1008

***Bedford Borough Council estimate

- 6.4 The proportion of the overall housing supply that has been affordable housing has shown a marked volatility. It has varied from 15.35% in 2006/07 to 75.11% in 2009/10, the overall percentage being 39.0%. Overall the Council has met its target of 200 dwellings per year. The average for the 10 year period is 252. This falls just short of the 256 identified as needed in the SHMA.
- 6.5 The overall average is boosted substantially by the performance in the 3 years 2009/10 – 2011/12 when high levels of grant were available and the Council with its partners was successful in bringing forward schemes to take advantage of this. (HCA grant was reduced heavily from 2011 following the 2010 Autumn Statement but there is a time lag in housing delivery – an effect that to some degree continued after 2011/12).

- 6.6 Forecasts for affordable housing completions for the period covered by this strategy review are shown in the Table below. The total currently forecast for the 4 year period is 1181, an average of 295 per year. However the number of completions for 2015/16 is below the 200 target. The number forecast for 2016/17 is above the 200 target but below the 256 identified and needed in the SHMA. These forecasts are based on information provided by Housing Associations but their programmes are all under review. The challenges faced by the Council and Housing Associations in delivering affordable housing have been set out earlier in the Review. Like all development programmes the forecasts may be subject to slippage but they are based on the best information available from the Registered Providers delivering the schemes.

Figure 7: Affordable Housing Completions

Year	Completions
2015/16	179
2016/17	231
2017/18	384
2018/19	387

7. Tenure and Affordability

Intermediate Housing and Starter Homes

- 7.1 Affordable Housing has not been limited to the provision of housing for rent but has always included what is known as Intermediate Tenure housing which has been almost entirely made up of different forms of Low Cost Home Ownership. Intermediate Housing has been defined to include Intermediate Rent, Shared Ownership and Shared Equity. Intermediate Rents were set at 80% of market rents and has been overtaken by Affordable Rent as the rents are calculated on the same basis. Shared Ownership is the predominant form of Low Cost Home Ownership. Initial shares purchased in Bedford Borough are typically circa 40%. To be eligible household income is capped at £60,000. Shared Equity creates a purchase price for buyers at 75-80% of open market value. The income and deposit required are therefore significantly higher than for Shared Ownership.
- 7.2 Deposits remain an issue for some people with incomes that could support a mortgage, at least in the context of shared ownership. Rent-to-buy schemes may have a useful role but income requirements linked to the possibility of purchase mean that they are not equivalent to affordable rent.
- 7.3 The Government is consulting on extending the definition of affordable housing to include starter homes. There is continuing uncertainty about the length of time before a purchaser of a starter home can sell on the open market but the Government has indicated that it does not intend to maintain the current position that affordable housing is provided in perpetuity or that the subsidy is recycled. If affordable housing is not provided in perpetuity the policy will only provide a quick wins for the first purchasers.
- 7.4 The Housing and Planning Act creates a general duty on Local Planning Authorities to promote starter homes and to monitor the delivery of starter homes in their district and provisions for starter homes to be required when granting planning permission. The Housing and Planning Act defines starter homes as new homes sold at a discount of at least 20% of open market value to first time buyers below the age of 40 years. The price cap for starter homes located outside Greater London is £250,000.
- 7.5 Survey evidence shows a widespread wish for owner-occupation but the key issues are the ability to do so in terms of access to finance and affordability. While acknowledging that the initiative could widen opportunities for home ownership the SHMA says):
- “It is evident that the weekly costs associated with Starter Homes are notable higher than low cost home ownership and also much higher than median private sector rents and therefore they are unlikely to be affordable to those households identified as being unable to afford market housing.” (SHMA para 6.36)

- 7.6 The £250,000 cap for the discounted price equates to a market price of £312,500. In the Bedford Borough context this is above the price of a new 3 bedroom house rather than a smaller starter home. There are new 3 bedroom properties on the market in Bedford Borough at £268,000 and £260,000.
- 7.7 Viability and priority for Starter Homes and other forms of low cost home ownership will squeeze out affordable rented housing. This does not match the evidence of the local market position and does not conform with allowing local market evidence to set priorities. Amending the definition of affordable housing will facilitate house purchase for one section of the income distribution but will not address the housing needs of people on low incomes. The lack of commitment at central Government level to sustaining an adequate development pipeline of affordable rented housing is a serious concern.
- 7.8 Social Rented and Affordable Rented Housing is required by a substantial section of the population requiring affordable housing who will only be helped by the provision of rented housing at below market rates. This is also the section of the population that concerns the Council directly through the Housing Register and the Homelessness Duty.
- 7.9 The affordability of Affordable Rented housing (with rents set at 80% of market rents) is an issue with larger dwellings (4 bedroom plus). Housing Associations monitor the Local Housing Allowance level in relation to Affordable Rents to manage the risk of rents being unaffordable to tenants on Housing Benefit. The Council has reviewed the approach the RSLs are taking to affordability in the context of the new funding regime and the introduction of Affordable Rents.
- All the RSLs that have responded are using Local Housing Allowance (LHA) as a proxy for affordability. In other words their rents for new properties are set at the lower of 80% of open market rents or the LHA.
- 7.10 Registered Providers have been reviewing their approach in the light of the Government's policy change introducing a 1% per annum rent reduction - announced by the chancellor in July 2015.
- 7.11 The withdrawal of the "spare room subsidy" from Housing Benefit has also have an impact on affordability for some tenants. bpha introduced a 'Room to Move' scheme in 2013. Since the introduction of the scheme 90 applications have been accepted from residents wishing to downsize. Not all of the applications have resulted from the introduction of the 'spare room supplement' rule. It should be noted that supported housing schemes can have different rent regimes.
- 7.12 It should be noted that the Private Rented Sector combined with Housing Benefit is likely to be more affordable in many cases than subsidised owner-occupation. The Council notes that Government wishes to see reductions in the cost of welfare benefits. However, reductions in capital investment in affordable rented housing have been so pronounced that policy on addressing housing needs must be considered to be focussed on income support rather than capital investment. If this remains the overall Government policy context, consideration should be given to facilitating planning policy support for Private Rented Sector housing in particular Private Rented Sector housing that is accessible to people reliant on Housing Benefit.

Affordable Housing and Affordable Rent Targets

- 7.13 The Housing Strategy Review target for Affordable Housing is set at 256 dwellings per annum following the findings of the SHMA. This target could be achievable if starter homes are included. However starter homes do not address the same need as other forms of affordable housing and, if a higher income group is included, there may be a revision to the SHMA which increases the affordable housing target. There has been comment nationally that developers may be considering delaying applications until the situation is clear in the hope that they will be able to avoid providing Affordable Rented or Shared Ownership housing and discharge their obligations by providing starter homes.
- 7.14 The balance between affordable rented housing and affordable low cost home ownership will be significant. The SHMA analyses income levels in relation to housing costs. On the assumption that all those who can afford Affordable Rent without Housing Benefit could afford Shared Ownership and that 35% of household income is assigned to housing costs there is a requirement for 76% of the affordable housing provided to be Affordable Rent. This would result in an Affordable Rent requirement of 195 dwellings out of the 256 annual total affordable housing requirement.
- 7.15 In practice, a significant number of households who can afford Affordable Rent without Housing Benefit would not be able to access Shared Ownership. The data is not available to quantify this but one method of adjustment would be to adopt a lower proportion of household income as the benchmark for assessing affordability. If 25% of household income is ascribed to housing then the Affordable Rent requirement rises to 86% of the total affordable housing requirement – 220 of the 256 total.
- 7.16 The Council has depended heavily on supply from S106 sites. In the three years to 2014/15 nearly two thirds of the Affordable Housing supply came from S106 sites. If schemes for the frail elderly are excluded this rises to approximately 90%. The Council will need to consider what alternative approaches are available and the Housing Strategy Review seeks to begin that process.
- 7.17 In negotiating S106 affordable housing contributions the Council has operated a practice over many years of seeking 66% rented housing and 34% shared ownership but with a minimum provision of 34% rented and 66% shared ownership. For many years the Council secured its preferred tenure balance in S106 agreements on the basis of grant subsidy being available to Registered Providers from the Homes and Communities Agency. When grant ceased to be available for S106 sites many schemes fell short of the Council's overall policy requirement of 30% Affordable Housing and the mix of Affordable Housing tenures also became an element in the negotiations with applicants. Because the return to the developer on shared ownership dwellings is generally higher than for rented dwellings, the balance is subject to amendment in the light of viability issues. In recent years, across all schemes, approximately half of the Affordable Housing provided in Bedford Borough has been Shared Ownership housing.
- 7.18 On S106 sites the Council has to balance meeting the need for Affordable Rent demonstrated by the SHMA against supporting access to owner-occupation; the duty that will be in place from a date in 2016 to promote starter homes and the need to consider the viability of schemes.

- 7.19 Also the Council must also consider the views of its Housing Association partners. An element of Shared Ownership within a scheme can be an important factor in the viability of the scheme for Housing Associations. The implications of the July budget change to a CPI-1% rent regime and the voluntary agreement on the Right to Buy have not yet become clear and will vary between Housing Associations. An element of cross-subsidy from Shared Ownership to Affordable Rent may be necessary. Rent to Buy schemes may play a useful role but the income restrictions on access distinguish these schemes from affordable rented schemes.
- 7.20 The proposed Starter Homes requirement combined with the reliance on viability appraisals will severely limit the affordable rented housing secured through S106 agreements, so much so that it is unrealistic to seek to deliver the affordable rented housing required through the promotion of additional schemes. In the context of the current policy framework created by central Government and the characteristics of the Bedford Borough housing market, the most realistic response is to focus on securing what affordable rented housing can be secured and to develop long-term well managed private rented sector housing
- 7.21 Given the evidence from the SHMA the Housing Strategy Review target for Affordable Rented housing is a minimum of 195 affordable rented dwellings per annum. It is difficult to foresee any policy mix within the context of the current housing market, current Government policies and the resources available to the Council that will deliver 195 – 220 Affordable Rented dwellings per annum.
- 7.22 The continued growth in supply in the private rented sector means that the potential of this sector to meet housing needs is significant. The Council is now able to discharge its homelessness duty with offers in the private rented sector provided the initial tenancy is available for one year. The affordability of decent accommodation and access are key issues. The availability of accessible private rented sector is limited primarily by the Local Housing Allowance limits on rents that are eligible for Housing Benefit which are not attractive to most landlords.

8. Strategic Direction

- 8.1 The Bedford Borough Council Corporate Plan 2012-16 set the following strategic objective:

To deliver a balanced supply of homes through an integrated housing system through more effective partnerships with statutory and non-statutory services, shaped by an effective housing strategy, to meet the needs of our growing and increasingly ageing population; To ensure that regeneration is complementary to the Borough's built environment.

- 8.2 Developing the Corporate Plan objective in the context of national policy as it is evolving suggests a range of policy responses and key objectives for this Housing Strategy Review:

- Recognise that housing development in Bedford Borough will continue to be private sector lead development primarily targeted at owner-occupiers and that the continued support for access to the sector provided through mechanisms like Help to Buy is important to maintaining the delivery of new housing..
- Support the development of the private rented sector in Bedford Borough and engage with it positively while continuing to use powers available to the Council to support high standards and tackle rogue landlords.
- Respond positively to changes to the planning system to support the increased opportunities and flexibilities to deliver new housing. A proactive response will place the Council in the best position to shape the development to meet the needs of the community.
- Bring forward a mixed range of schemes that include urban schemes, sustainable urban extensions and schemes in the more sustainable villages.
- Support the development of self-build and custom build schemes which can facilitate local small and medium size enterprises and a broader range of sites.
- Recognise that only viable schemes will deliver affordable housing. This means that schemes must be large enough to generate an affordable housing requirement, in areas with values that will support the delivery of affordable housing, and free of infrastructure requirements which will undermine the viability of the schemes.
- Recognise that with limited Government funding housing associations will be more cautious about development commitments and the creation of a positive environment to support that investment is essential.
- Identify land in the Council's ownership and work with other public agencies to deliver additional land for housing and to bring forward schemes. Use the Council's land assets to support the delivery of housing, particularly affordable housing.
- Consider direct engagement in bringing forward housing developments through new investment vehicles created by the Council or in partnership.
- Continue to address long-term empty properties.
- Identify previously developed land and buildings that could be made available for residential use and work proactively to address the challenges in bringing them back into use.

- Support the development of master-planning for areas of growth including areas identified in the Town Centre Area Action Plan. Consider the development of delivery mechanisms in relation to these proposals and the potential use of compulsory purchase powers.
- Identify the most effective ways in which changes to the mix of accommodation available can meet the needs of those who need care and support.



9. Maintaining Housing Delivery: Sustainable Urban Extensions and New Settlements

9.1 Over 10,000 dwellings are dependent upon 10 strategic sites. (Wixams is double the size shown in the table but 50% is in Central Bedfordshire).

Just over 3,000 had been delivered at 31 March 2015; nearly half, 4,713, are in the five year supply forecast by the Council. The following Sustainable Urban Extensions are on site and delivering homes and this will continue through the review period.

Figure 8: Strategic Sites and Delivery in Bedford Borough

Site	Total No Units	Completed		Remaining		5 Year Supply Total Completions (All Tenures)	Projected AH Completions to 2020/21
		Complete at 31.03.15	Of Which Affordable	Units remaining at 31.03.15	Of Which Affordable		
Wixams	2250	827	213	1423	350	486	122
Land West of Bedford	2750	1395	413	1355	192	1380	192
RAF Cardington (Shortstown)	970	315	93	655	152	518	64
Norse Road, Phase 3	322	237	70	85	15	85	15
Land North of Fields Road, Wootton*	673	232	43	441	162	449	134
Cardington Sheds	746	0	0	746	75	390	39
Land South of Fields Road, Wootton	600	0	0	600	180	475	143
Land North of Bromham Road, Biddenham	1300	0	0	1300	260	485	97
Land Off Rousebury Road, Stewartby	610	0	0	610	183	510	153
TOTAL	10,231	3006	832	7225	1568	4778	959

* Land North of Fields Rd, Wootton includes 70 additional units over and above the original outline consent for 603 units

- 9.2 Of the sites that have no completions at 31.03.15 only Land South of Fields Rd, Wootton is without at least outline planning permission. Land South of Fields Rd, Wootton does have resolution to approve for all 600 dwellings. Rousebury Rd, Stewartby has now started on site. Land North of Bromham Road, Biddenham has reserved matters approval for the eastern and western land parcels which together make up over 50% of the development. The remaining sites are the subject of ongoing detailed planning discussions.
- 9.3 Work on strategic sites focusses on a number of issues:
- a. Delivery of infrastructure. A range of key infrastructure projects have contributed to the delivery of these Sustainable Urban Extensions
 - Dualling of the A421 from Bedford to the M1.
 - Construction of Bedford Western Bypass (Phase 1 complete; Phase 2 on site).
 - Realignment of A6.
 - Realignment of A600.
 - Construction of Bedford Orbital Sewer.
 - b. Master-planning developments.
 - Producing development briefs.
 - Developing strategic plans.
 - Processing Reserved Matters Applications for housing parcels.
 - Securing delivery of schools, local centres, open spaces and other essential social infrastructure.
 - c. Resolution of Viability and Affordable Housing Issues
 - Securing investment from Registered Providers.
 - Securing Homes and Communities Agency grant.
 - Managing housing mix requirements.
 - Resolving S106 and viability issues.
- 9.4 The progress made on all these issues across most of these developments supports the delivery that is now in progress.
- 9.5 Wixams Villages 2, 3 and 4 require significant infrastructure investment, in particular in the new station, the construction of a new road from the A6 across the Town Centre to the station and the delivery of a secondary school. The speed with which the developer intends to bring development forward is uncertain. Progress has been made in developing Design Briefs for Villages 2 and 4 which have been adopted. Negotiations are continuing on securing the delivery of infrastructure. As noted above 50% of Wixams is in Central Bedfordshire. Affordable Housing is, through the S106 agreement, allocated 50-50 between Bedford Borough and Central Bedfordshire as it becomes available. Following an arrangement made when Lakeside (Village One) was developed the houses count towards planning totals (including Affordable Housing totals) in the local authority area in which they are located. The development strategy adopted by the developer will therefore affect the supply totals for each local authority in any given year.

- 9.6 A key issue with all developments is the need to balance the objective of securing S106 contributions, including Affordable Housing, as close to Planning Policy objectives as possible with the need to ensure that schemes are viable and deliverable. This balance is kept under review. Viability negotiations led to reductions in Affordable Housing at Land West of Bedford, RAF Cardington (Shortstown) and Land North of Bromham Road. Either new grant or recycled grant from earlier schemes has been important at Norse Road, Land West of Bedford, RAF Cardington (Shortstown) and Land North of Fields Road. Negotiations with the HCA helped to facilitate this. Part of the contribution to RAF Cardington (Shortstown) was made in the form of delivery of the Traveller site at Willow Drift.
- 9.7 Additional urban extensions, extensions to key settlements or a new settlement could be identified to meet the requirements of the Local Plan to 2035. The master-planning and delivery of infrastructure creates a long lead-time for such projects. It will not delivery in the period of this Housing Strategy but it is important to look ahead and a new settlement is one of the options being considered which could contribute to delivery in the late years of the Local Plan 2035.



10. Maintaining Housing Delivery: Urban Sites

- 10.1 Some urban development sites have proved more difficult to bring forward than development in the rural area or in urban extensions. There have been some notable successes but there are also sites that have not come forward. Development of urban sites stalled almost completely in the recession and this position is only slowly recovering. This contrasts with the planning priority that is generally attached to the development of brown field sites and Government aspirations for previously developed land to provide the bulk of new homes. In Bedford the amount of underused or unused previously developed land is diminishing quickly.
- 10.2 The Council has been successful with housing projects within the Town Centre. The Castle Quays development and the Riverside North development have both involved Council owned land. These developments demonstrate that the Council can work effectively with the private sector, voluntary organisations and Government agencies to deliver regeneration projects. Castle Quays was a successful mixed use development that included 108 flats. This was delivered during the recession but had been sold off-plan before it. The Riverside North development will include 66 flats; options to include more were considered but the market for flats in the urban centre was not considered strong enough at the time the scheme was developed. 1 – 4 St Pauls Square are four houses, three of which are listed and one of which is a late medieval building have been restored and converted into ten dwellings by a housing association with support from the Council and the High Street Townscape Heritage Initiative.

Housing provision was planned within Town Centre West but this scheme did not proceed due to the recession.

- 10.3 North of the River Ouse much of the centre of Bedford is a conservation area and limited development opportunities consist primarily of sensitive infill. South of the river existing buildings and underused land create fewer constraints. The vision for Kingsway could be for a new town quarter. Here there is the opportunity to create a new quarter with its own contemporary concept and integrity. This could be a high density and high rise district. The corollary of this is that design standards would need to be high with a strong emphasis on public realm.
- 10.4 There has been a steady flow of sites coming forward as a result of the release of land from employment uses. The Town Centre developments noted above come into this category. The following developments are in progress or have the potential to come forward in the lifetime of the Housing Strategy review:
- i. Riverside North – Formerly the Town Hall and car park. Legal agreements to deliver the scheme have been completed and work has commenced on site. The affordable housing provider informs that first handovers are due in spring 2017.
 - ii. Melbourne House – Formerly additional County Council offices could deliver a new scheme of 90 flats.
 - iii. Complex Needs Project – Formerly Clarence Hotel will deliver a 29 units scheme for homeless people.

- iv. Kingsway – The site at the corner of Kingsway and Cauldwell Street has planning permission to deliver 36 flats. This could be developed in accordance with the permission or a more extensive scheme including the Council's owned land at 26 Cauldwell Street could be brought forward.
- v. Warwick Avenue – The former De Montfort University site - Renovated houses on Lansdowne Road have been delivered. Planning permission has been granted for the new build development following a viability assessment. The developer is in discussion to discharge pre commencement planning conditions and indicates they intend to start on site summer 2016.
- vi. Eastcotts Road, Bedford (Former Hallmark Cards and Turnpike PH) – This scheme is on site and is being supported by a loan from the HCA. The developer is in contract to deliver the affordable housing. Some completions were achieved in March as programmed and others have slipped to June 2016.
- vii. Britannia Works, Phases E & F – Planning permission has been granted and work to deliver the first 60 houses is in progress. Following a viability appraisal affordable housing provision was agreed. Discussions are in progress with the developer regarding possible alternative ways forward to deliver affordable housing and improve the design of the site.
- viii. Dallas Road –The former Texas Instruments site – has resolution to approve outline planning permission for residential development. A viability appraisal has been submitted and is being considered. The land is in the ownership of a private individual, Bedford Borough Council and Kempston Town Council and a landowners' agreement will ultimately be necessary before development can take place.
- ix. Derwent Place – This is a poor quality under-used employment site. A planning permission has been granted for 21 affordable dwellings. Funding has been identified and a start on site later in 2016 is programmed.
- x. Progress Ford site, Broadway – Discussions with the owners indicate that they continue to hope to build out the care home for which planning permission has been granted but there is no programme. The car park now extends across the site following demolition of the remaining buildings and the owners would only consider exceptionally high offers for the site.
- xi. Rear of Austin Canons, Kempston – On site. The affordable housing was provided on Phase 1.
- xii. Newnorth Printers, College Street, Kempston – this site has outline planning permission for 30 dwellings. The delivery of the housing scheme is dependent upon the relocation of the existing print business. Council officers are in discussion with Newnorth Printers on this matter.
- xiii. South of Ford End Road, Bedford – This is a significant site with land assembly, contamination and access to brewery issues and the continuing uncertainty over the intentions of the landowners. The site opposite – North of Ford End Road, is also under consideration.

- xiv. Camford Works, Ampthill Road, Bedford – The developer is primarily focussed on additional commercial use following the delivery of the Morrisons food store. The residential development in the original planning application would require land assembly, but the developer has indicated that he intends to focus on land in his ownership.
- 10.5 The range of employment sites under development for housing indicates the extent to which the Council has, over many years, been willing to accept the transfer of sites to residential use where employment use is no longer sustainable. For example the Newnorth Printers site on College Street is only the latest of a number of sites on College Street released from employment use. The stages of Britannia Works already built out have provided 367 dwellings. There are also numerous smaller sites, under the threshold of 15 for an affordable housing requirement to apply in the urban area.
- 10.6 An employment sites review for the 2035 Local Plan will identify key sites, sites that are useful and should be retained and sites that could be considered for alternative uses. This could generate a further supply of previously developed land for residential development.
- 10.7 It is not clear how attractive to developers the new planning regulation providing for starter homes will be in a Bedford context. The Council is flexible about affordable housing and CIL/S106 obligations to support the development of sites in the urban area. The loss of 20% of value to provide starter homes may not provide the incentive that it appears to at first sight but where it is the key to the release of the sites this could be significant.
- 10.8 In addition to the new build urban sites there have also been a large number of conversions of offices to residential accepted as permitted development. There was a limited flow of such schemes prior to the regulatory change – BT Tower and Heron House being prominent examples. Figure 9 shows the proposed residential conversion of offices schemes and those that have been implemented. At 31 March 2016 18% of these units were completed.

Figure 9: Residential Conversion of Offices Schemes in Bedford Borough

Address	Total Dwellings	Complete at 31/03/16
Schemes Completed or Partially Completed at 31st March 2016		
31 - 33 Goldington Road, Bedford	5	5
29 Goldington Road, Bedford	10	10
57 St Peters Street, Bedford	1	1
Greensbury Farm, Thurleigh Road, Bolnhurst	5	5
Cambridge House, Cambridge Road, Bedford	9	9
Sovereign House, Cambridge Road, Bedford	9	9
Rogers Court, Kingsway, Bedford	20	20
Eagle Court, Harpur Street, Bedford	19	19
1-3 Union St, Bedford	9	2
87 High Street, Bedford	5	5
Portman House, Goldington Road, Bedford	31	31
62-64 Bromham Rd, Bedford	9	9
Crescent House, The Crescent, Bedford	8	8
26 Molly Moore Ave, Kempston	1	1
5 Union St, Bedford	6	6
Total Completed or Partially Completed Schemes	147	140
Schemes Yet to Start		
2A Beaconsfield Street, Bedford	1	
14 St Cuthberts Street, Bedford	12	
Technology House, Ampthill Road, Bedford	98	
1 - 13 Greyfriars & 57 - 65 Midland Road, Bedford	18	
The Old Coalhouse, Rosamond Road, Bedford	1	
Zurich House, Goldington Road, Bedford	31	
The Highways Agency, Lime Street, Bedford	8	
67 Goldington Road, Bedford	1	
80 Tavistock St, Bedford	2	
Tythe Farm, Staploe Rd, Wyboston	8	
Greyfriars Chambers, Greyfriars, Bedford	6	

48 Kimbolton Rd, Bedford	1	
45 Harpur St, Bedford	9	
Merton Centre, St Peters St, Bedford	148	
Pilgrims House, Horne Lane, Bedford	23	
Building Adj The Heights, St Johns St, Bedford	38	
The Old Hay Barn, Bamfords Yard, Turvey	1	
Manor Farm, Whitwick Grn Rd, Thurleigh	1	
49A & 51 Bromham Rd, Bedford	45	
Swan House, 3 High St, Bedford	12	
West One, 63-67 Bromham Rd, Bedford	12	
77-97 Harpur St, Bedford	21	
41-43 Mill St, Bedford	6	
59B High St, Harrold	1	
2 Thurlow St, Bedford	1	
49A & 51 Bromham Rd, Bedford	7	
Chesham House, 47 Bromham Rd, Bedford	18	
90 Margaretts Rd, Kempston	1	
136-140 Bedford Road, Kempston	6	
Chaddesley House, 12 Lime Street, Bedford	12	
1st Floor, 61-63 Midland Road, Bedford	6	
Dixon House, 77-97 Harpur Street, Bedford	25	
48-50 Harpur Street, Bedford	2	
23 Fosterhill Road, Bedford	1	
8-10 Howard Street, Bedford	10	
13A High Street, Clapham	2	
The Central Club, 45 Harpur Street, Bedford	21	
19A Ivy Road, Bedford	1	
Total Units in Schemes Yet to Start	617	
Total Office Conversions	764	140

11. Maintaining Housing Delivery: Rural Housing

- 11.1 There will be a need to provide affordable housing to meet general housing needs, not just needs specific to particular villages, in rural settlements. The provision of new housing in rural settlements can enhance or maintain the vitality of rural communities through a process of active management of growth. It is recognised that the physical and social infrastructure implications need to be considered. The level of housing to be provided in the rural area to meet the Borough's needs as a whole and the distribution of that housing in existing settlements and potential new settlements will be determined through the Local Plan 2035.
- 11.2 Neighbourhood Plans are a significant new feature in considering local housing needs and 22 Neighbourhood Areas have been designated. Neighbourhood Plans will need to evidence their housing needs and comply with the strategic policies of the relevant Local Plan at the time of submission.
- 11.3 Under existing planning policy residential development is focussed on settlements with Settlement Policy Areas. Development. Outside SPAs development is only permitted where, consistent with development plan policy, which includes policy to meet local needs through exception sites. An exception scheme requires a local need survey. Many Parish Councils (PCs) have carried out Housing Needs Surveys but few have actively progressed a scheme and no exception sites have been successfully developed in recent years. Three Parish Councils are seeking to progress schemes (Sharnbrook, Great Barford and Wyboston). The scheme at Sharnbrook has resolution to grant and a scheme at Great Barford that includes provision for local needs also has resolution to grant.
- 11.4 Parish Councils have raised significant concerns about how dwellings within exception schemes are allocated. Some of the people the Parish Councils are concerned to house have not been eligible under the Allocation Scheme and there is a concern that this leads to people with no connection to the parish being housed within a rural exception scheme while those considered to be in "local need" do not achieve sufficient priority. Within the last year the Allocations Scheme has been modified to create greater flexibility and responsiveness in the assessment of local needs to address these issues.
- 11.5 The National Planning Policy Framework for the first time allows for some market housing in exception sites to facilitate delivery. This may be particularly significant where a scheme is required to contribute to local infrastructure. In addition to the contribution market housing can make to deliverability some parishes have indicated a desire to see a limited number of small (2 and 3 bedroomed) houses – not officially "affordable" houses but accessible to people on modest incomes - as there has been a trend for houses to be extended and new developments to focus on larger houses leaving a dwindling supply of lower cost and smaller houses. Where it is demonstrated that market housing will contribute to the deliverability of a scheme consideration should be given to the provision of smaller more affordable dwellings.
- 11.6 Starter homes could also prove to be a feature of rural exception schemes that both improves viability and allows schemes to match more closely the aspirations of many parishes for smaller homes for sale targeted at local residents.

- 11.7 The rural population is older and ageing faster on average, than the urban population. Alongside starter homes many parishes wish to see the provision of owner-occupied accommodation for people down-sizing which enable older people to remain in their communities where they are more likely to be supported and socially connected. The challenge is to ensure that market homes to go to local people when they are first built and on subsequent resales.
- 11.8 The Council could consider being more proactive in supporting the delivery of schemes that will serve the needs of a number of parishes. There is a cascade mechanism in rural exception which means that those with a housing need in neighbouring parishes form the second preference group after those in the parish itself. This principle could be extended to assess housing needs across a group of parishes. This would permit the development of more viable schemes of approx. 15 dwellings rather than less viable schemes of less than ten dwellings.
- 11.9 The threshold of 10 dwellings or 1,000 square meters which was introduced and then quashed by the courts would, if re-introduced, mean that in many villages exception sites will be the only way to deliver affordable housing.
- 11.10 The following rural sites are currently progressing:
- i. The Lane, Wyboston – A new Housing Needs Survey has been completed and Stonewater (as the newly merged Jephson and Raglan is known) have submitted a planning application for 11 dwellings (8 affordable and 3 private sale) under exception policy (CP17). The Parish Council have indicated in principle support for the scheme.
 - ii. Mill Road, Sharnbrook – a rural exception scheme of 13 dwellings – 9 affordable and 4 private sale. An extensive public consultation exercise has been undertaken. The planning application is the subject of a resolution to grant permission.
 - iii. Roxton Road – Great Barford – A scheme has resolution to approve outline consent for 81 dwellings. This includes rural exception scheme housing which is located in part of the site that is outside the Settlement Policy Area. The S106 is in negotiation, although the owners have indicated that they would prefer these discussions to take place with the housing developer who purchases the site.
 - iv. Rushden Road, Wymington – This is an all affordable housing scheme of 26 dwellings which has full planning permission. The RSL – Orbit Housing Group – are in the process of agreeing funding with the HCA and intend to start on site in summer 2016.
 - v. Land Adjacent to 24 Lovell Road, Oakley – This is a scheme of 15 dwellings which will include 5 affordable dwellings. Outline planning permission has been issued following the completion of the S106 agreement. The owners indicate that they intend to sell the site.
 - vi. Land at Hall End Rd, Wootton - A full planning permission for 58 dwellings has been granted.
 - vii. West Wixams – This is the former Elstow Hostel site which is half in Central Bedfordshire. It will eventually form part of Wixams but is being developed independently. It is on site.
 - viii. Former Lower School, High Street, Elstow – The original applicant sold the site to another private developer and work has commenced.

12. Maintaining Housing Delivery: Supported Housing

- 12.1 As noted above the Council is developing a Care and Support Accommodation Strategy. This will be developed working closely with Adult Services. The strategy will seek to identify the range of accommodation that is required for people with care needs and the optimum strategies for delivery.
- 12.2 The Council published an Older Persons Accommodation Strategy. This was reviewed by Deloitte in 2014 and its conclusions were broadly supported.
- 12.3 One key element that derived from the Older Persons Accommodation Strategy was the need for investment in extra care schemes. These schemes provide the range of facilities and support that allow older people to remain resident even as their care needs increase. Five Extra Care schemes for older people have been delivered or are planned:
- i. Gordon Colling House – Completed in 2013 the scheme provides 55 affordable rented flats
 - ii. St Bedes – Completed in 2014 this award winning scheme provides 53 shared ownership flats and 51 affordable rented flats
 - iii. Charter House - The new care home for Bedford Citizens HA is now completed. Grant from the HCA has been agreed for the 42 affordable rented extra-care flats which will form part of the overall scheme. This started on site in July 2015 with completion forecast for October 2016.
 - iv. Fields Road, Wootton – A scheme for 55 extra care flats is planned for South of Fields Road, Wootton
 - v. Wixams – A scheme for 230 extra care flats has planning permission and is planned for completion in 2019.
- 12.4 A second key element was the need to modernise residential and nursing care provision. The Council has recently announced a major £3.5 million programme to refresh and improve five care homes in its own management.
- “In approving the programme the Council noted that the homes form part of a local care economy in which there is sufficient residential care beds for the foreseeable future. If there is to be a pressure on supply in the future it is likely to be for nursing beds, some of which will be met from other suppliers. The Council would have the option to convert existing residential care beds into nursing beds if we so wished which would require a change to the statement of purpose and the employment of qualified nursing staff.”
- 12.5 A third element was the need to review the number and quality of older sheltered housing schemes. The Council has worked with Housing Association partners and there has been a reduction in overall number of units in cooperation with the landlords. This was achieved by decommissioning units where there was no or low demand. There has been an overall reduction of 167 sheltered housing units and an increase of 159 units of extra care provision of which 53 were for sale units
- 12.6 Complex Needs Project – Work is continuing to deliver the Complex Needs Project and it is expected that building work will commence in summer 2016.

13. Options to increase housing supply: Resources

13.1 Revenue: The Housing Strategy Team experienced staff shortages in the period 2012 – 14 but this has been rectified. Promoting the delivery of new homes brings significant benefits to the Council as well as addressing a key need in the community:

- New Homes Bonus
- Additional Council Tax Revenues
- Regeneration and growth which also contributes to revenues
- Reduced social stress which reduces costs to service departments

13.2 Capital: In the years following the stock transfer to bpha substantial funds were available for investment in affordable housing. Following unitary reorganisation the financial position of Bedford Borough Council was changed significantly and this coincided with a period of reductions in public expenditure. As a result the Council has taken the approach of conserving funds as far as possible. Nevertheless, the benefit of maintaining a limited fund towards provision of affordable housing is that Housing Associations can be encouraged to pursue schemes with more confidence where some local authority funding may be available to get a scheme that is marginal in terms of viability over the line. The funding levels available to the Council can only make a small contribution relative to the resources applied by housing associations themselves, developer contributions through S106 agreements and Government funding through the HCA. Frequently it is not actually necessary to make a contribution however there have been cases where it has been helpful.

13.3 It is not possible for the Council's grant funding to replace the funding that was available from the Homes and Communities Agency. There is currently £408,000 in the Capital Programme and resources are made available at a rate of £100,000 a year. To put this in perspective HCA grant the year before each of the three years in which affordable housing provided over 60% of the housing completions (noting the delay between starts and completions) was as follows:

Figure 10: HCA Grant Funding Received 2007/08-2009/10

Year	Grant Received
2007/08	£5,093,466
2008/09	£4,738,136
2009/10	£5,856,500

13.4 The Council contributed a further £2,401,000 from the Capital Programme over those three years.

13.5 The Council now has a very limited capital budget to support affordable housing. This budget is reserved for priority projects where small injections of capital will make the difference – such as 1 – 4 St Pauls Square where £150,000 of Council affordable housing funding contributed to an overall project cost of £1.925m.

13.6 The Council will continue to review its use of capital funding to support affordable housing, particularly in the context of other initiatives that it may be open to the Council to undertake. In addition the Council is currently holding a total of £197,733 gathered from commuted sums.

- 13.7 Financial constraints limit the ability of the Council to fund development but the option of loans can also be considered. Housing Associations face limitations to their borrowing capacity, varying costs of finance, and often high levels of complexity in securing access to loans. The example of Plymouth is being monitored. With a population of over a quarter of a million Plymouth is a bigger authority but it is comparable in that it has transferred its housing stock. In November 2013 it launched a £50m loan scheme to support the delivery of affordable housing with loans available at 3%. Initially take-up was slow as Registered Providers were heavily engaged with pursuing other opportunities and delivering existing programmes. Following the setting of a deadline of August 31 2015 there have been five bids. The nature of the bids ranges from under £1m for a small community based organisation to £18m for a larger scale development. There is variation in the types of organisation bidding but a straightforward process is a significant attraction.
- 13.8 Land: The use of the Council's land assets to actively promote and engage in development is likely to be an important component of a new approach to delivering housing. It is unlikely that a passive approach of allocating land, granting planning permissions and allowing development to proceed at the pace set by the development industry will deliver the growth that the Council needs. A proactive approach also makes it possible for the Council to have greater influence over the form and location of development.
- 13.9 The state of the housing and land markets, budgetary pressures and the need to support the capital programme have created a focus on disposals of land to maximise capital receipts to the Council. Many of the Council's residential sites have been sold in this way. The nature of the sites that the Council now holds and the investment opportunities that are associated with them call for consideration of alternative options including development agreement and joint ventures. The Council has experience of such developments at, for example, Castle Quays and Riverside North.
- 13.10 The Council regularly reviews its property assets and seeks to identify surplus sites and sites that offer development potential to meet the need for homes or other needs and to support regeneration and growth. The other financial pressures on the Council, particularly the need to fund the Capital Programme, remain important but the Council is improving the co-ordination of its approach to integrating consideration of the objectives set out in the Housing Strategy with its asset planning.
- 13.11 The Council could also seek to engage with other public sector land. The Council has had some success in this area with 1 – 4 St Pauls Square and is working on proposals for other sites. The Council already supports a public sector property managers' forum and is working with bpha on sites where the Council and bpha have adjoining land which could increase development potential. The Homes and Communities Agency also has a role in bringing forward public sector properties. The Housing Strategy Team is driving the development aspects of the One Public Estate partnership process.

14. Options to Increase Housing Delivery: The Planning System

- 14.1 The production of Local Plans and effective Development Management, including pre-application advice, play a key role in providing clarity about development opportunities to land owners and the development industry. The production of Development Briefs and the development of Supplementary Planning Documents could play a useful role in bringing forward development and may in some cases provide the basis for Compulsory Purchase Orders where land assembly to bring forward development is blocked by the unwillingness of individual owners to bring support development on timely and reasonable terms. Resource constraints and the requirements of the CPO process indicate that activity of this kind should be in conjunction with landowners and developers in a defined area who are willing to bring development forward.
- 14.2 Investment in infrastructure, both physical infrastructure and community infrastructure is also critical. It is evident that improvements in service and the environment are desirable in themselves and the council is already engaged in programmes to deliver these objectives. Options are constrained by other planning objectives and the availability of funds.
- 14.3 As the current plan period progressed infrastructure and other issues affecting the delivery of strategic sites were resolved to the point that these sites contributed strongly to delivery. The balance between different types of site for the next plan period will need to be considered. There needs to be a broad and balanced range of sites.
- 14.4 The Strategic Housing Market Assessment identifies the Objectively Assessed Needs identifies the housing supply. The planning system seeks to identify how that need will be met in the context of a wide range of objectives. The proposed Local Plan period has been extended from 2032 to 2035. This will require revisions to the evidence base, including the Strategic Housing Market Assessment, as well as creating a different timeframe for policy development. Deliverability and viability are key issues.
- 14.5 Neighbourhood Plans have to be consistent with the Local Plan but they have the potential to increase housing supply in rural communities
- 14.6 The preparation of the Local Plan 2035 will include a viability analysis of the plan. Pending that review there are two indications available. The study for CIL identified five areas within the borough within which it was appropriate to set different levels of CIL for housing developments. Settlements were placed within these five areas and this forms a quick guide to viability across the borough. The areas in ascending order of viability were:
1. Cotton End, Shortstown west, Elstow.
 2. South Bedford, Kempston, New Shortstown east & Stewartby.
 3. Bromham, Cardington, Carlton, Clapham, Cople, Great Barford, Oakley, Milton Ernest, Ravensden, Renhold, Riseley, Roxton, Stagsden, Stevington, Swineshead, Stewartby, Thurleigh, Turvey, Upper Dean, Wilden, Wilstead, Wixams, Wootton, Wyboston, Wymington, Yelden.
 4. North Bedford and Biddenham.
 5. Sharnbrook, Pavenham, Felmersham, Harrold, Bletsoe, Souldrop, Hinwick, Podington, Bolnhurst, Keysoe, Colmworth, Little Staughton, Staploe.

14.7 Options to improve viability and delivery include:

- Focus new development on those areas where schemes are typically more viable.
- Adjust CIL, Affordable Housing and other policy requirements to improve viability.
- Invest in infrastructure to improve viability.
- Promote the improvement of services to improve sales values; schools are particularly important.
- Bring forward environmental improvements to raise values; the quality of the public realm is significant.

14.8 The reduction in Affordable Housing secured through planning obligations supports overall housing delivery at the expense of affordable housing provision although if it enables some provision to come forward where it would not otherwise do so there is a gain to affordable housing as well. The Council has engaged in a number of viability exercises on a range of schemes. The result has ranged from limited commuted sums to Affordable Housing Delivery remaining at 30%. The results depend primarily upon sales values, exceptional costs and infrastructure requirements. At the time that Homes and Communities Agency grant for affordable housing was withdrawn from S106 sites the Government argued that grant was subsidising land values. The Government's approach to land values within viability appraisals has not followed through the implications of this, which is that land values should fall.

Figure 11: The Impact of Viability Assessments Undertaken in the Borough

Scheme Name	Total No Units	Post Viability AH Requirement %	Post Viability AH on-site Requirement No.	Original S106 AH requirement	Loss of AH on-site units (total)
Land West of Bedford Phase 2	1,392	14%	195	418	223
West Wixams	58	30%	17	17	0
RAF Cardington, Shortstown Phase 2	392	9%	35	118	82
Elstow School Site	19	26%	5	6	1
Land North of Bromham Road, Biddenham	1,300	20%	260	390	130
Shed 1, Cardington	592	10%	59	178	118
Britannia Works Phase E & F	206	23%	47	62	14
High Street, Stagsden	9	Commuted Sum (0%)	0	3	3
Lansdowne Road (Former De Montfort University)	152	14%	21	46	24

14.9 Viability is only one element in delivery. There should be consideration of ways in which the planning system can secure commitments to delivery. House of Commons Communities and Local Government Committee in its report on the DCLG consultation on national planning policy published in April 2016 said:

We recognise that there is no simple, one-size fits all solution. For example, the Minister told us that a likely consequence of applying council tax to undeveloped sites might simply be developers staggering applications for planning permissions for larger developments. Nevertheless, we believe that if the housing delivery test is to be an effective mechanism for ensuring that housing supply meets housing demand, there should be a combination of both carrot and stick.

Local authorities must have a range of tools at their disposal which are appropriate to their local circumstances, including direct involvement in developments, either independently or in partnership with developers. There should also be a clearer set of criteria which may be used to identify when a development scheme has stalled. The Department should review the appropriate consequences of housing under-delivery. In addition to the consequences already proposed where local authorities may be failing to grant permissions or allocate sufficient land, this should include identifying the powers local authorities ought to have in order to require or encourage developers to build out sites in their areas.

15. Options to Increase Housing Delivery: Housing Company

- 15.1 The functioning of the planning system is only one element in securing delivery. Housing supply responds to market conditions, the capacity of the construction industry and the supply chain, the structure of development finance and the operation of the land market,
- 15.2 The Council is considering the creation of a housing company. The aims of this company would be the delivery of new housing and the delivery of housing for homeless people. There are a number of potential benefits:
- Securing additional delivery of housing on a range of sites would support the Council's housing and planning objectives to deliver additional housing.
 - Delivering housing on challenging urban sites will fulfil regeneration objectives.
 - Where sites remain undeveloped for a long period compulsory purchase may unlock the site and the company could form a vehicle to support this.
 - Securing improved access for homeless people to housing fulfils housing and social objectives.
- 15.3 The general power of competence under the Localism Act 2011 has greatly simplified the legal basis for the creation of a company. Control of the Company would be through annual determination of objectives and budgets and quarterly reporting. The Council would be the sole shareholder. Directors need to have independence within this framework. Many Councils are developing housing companies and the Government is monitoring this development. The Government is concerned that Councils should not use housing companies to avoid the right to buy. It is supportive of housing companies being used for new build for sale and to address homelessness. The proposal envisages the possibility of some of the new build housing being private rented housing to support the viability of projects but the proposal is not directed at the development of general needs social rented housing or affordable rented housing which is the Government's key concern in relation to the Right to Buy.
- 15.4 The benefits of pursuing these projects through a company are:
- Improve the Council's ability to manage risks.
 - Create transparency about the investment and return.
 - Enable a flexible, commercial and light touch approach.
 - Draw in independent directors to strengthen the commercial approach.
 - Scope for drawing in other investors in future should the Council wish to do that.
 - A vehicle(s) will be created to allow the Council to respond to situations as they arise

- 15.5 Management arrangements will need to be identified where there is a rented stock. The Council already has a management agreement for its residual properties at The Grange. Other management options will also be considered including commercial management.
- 15.6 Local Authorities vary significantly in the nature of their housing market and the resources that they have available. A housing company will not necessarily be successful in all cases and conditions will vary over time. One of the benefits of a housing company could be an ability to act counter-cyclically. Initially a feasibility study will be required with a limited number of projects brought forward on a 'proof of concept' basis.



16. Options to Increase Delivery: Empty Homes

- 16.1 The Council launched a major initiative to tackle empty properties in August 2014. This builds on the Council's decision to apply a Council Tax surcharge of 50% to properties empty for more than two years from 1 April 2014. The programme includes devoting additional staff resources to contacting and working with owners of empty properties and a publicity campaign aimed at empty property owners. At the centre of the programme is a commitment to compulsorily purchase properties where owners persistently fail to bring their properties back into use. The Council has experience of the success of this process having compulsorily purchased 7 properties over the last 10 years. The new commitment represents a step-change in the level of activity which makes a concerted effort to tackle the problem possible.
- 16.2 The number of empty properties recorded by Council Tax has fallen from 598 in August 2014 to 459 in March 2016.
- 16.3 A Capital Programme of £2.89 million was created with proceeds from sales being recycled. Under powers delegated to the Assistant Director Planning, approval has been granted to proceed with the purchase of 29 properties should the owners fail to instigate the actions necessary to bring them back in to use. The total budget for this is £2.89 million.
- 16.4 To date seven of these 29 properties have come back in to use through the actions of the owners following the decision to initiate the compulsory purchase process.
- 16.5 Of these 29 properties formal compulsory purchase process have started for 18 properties and completed for a further 2.

The first step is to offer the owner the opportunity to voluntarily sell the property to the Council. Where this offer is refused or ignored and there is no evidence steps are being taken to bring the property back in to use, the process is carried forward. Two Compulsory Purchase Orders have been confirmed.

Figure 12: Progress with the CPO Programme

CPO Progress	No. of Properties
Properties Occupied following CPO Approval by Council	7
Voluntary Purchase Refused – Sold Privately; Renovation Works Under Way	2
Voluntary Purchase Refused – Sold Privately; Renovation Works Not Yet Started	1
Voluntary Purchase Refused – Property Potentially Being Sold Privately	2
Price Accepted for BBC Voluntary Purchase	4
Voluntary Purchase Offer Refused – CPO Proceeding	2
Total Number of CPO's in Progress	18
Compulsory Purchase Completed – Instruction raised to Market Properties	2
Total Number of CPO's Completed	2
Voluntary Purchase Completed – Instruction raised to Market Properties	1
Total Number of Voluntary Purchases Completed	1
Properties approved for CPO but formal process not yet commenced	
Reason for deferral of formal CPO process	
Works in Progress	7
Registered Provider Partner Required	1
Total	8
TOTAL – ALL PROPERTIES	29

- 16.6 Of the 29 properties:
- Severn have come back in to use through the actions of the owners following the decision to initiate the compulsory purchase process.
 - Two properties have been compulsory purchased by the Council. Instructions have been issued for them to be sold through a local estate agent.
 - One property has been acquired through voluntary purchase. An instruction has been issued for it to be sold through a local estate agent. A further 4 voluntary purchases are progressing.
 - Compulsory purchase action is about to commence for a further 2 properties as the owners have continued to fail to act to bring them back in to use (this has not been reflected in Table 12).
 - The remaining 6 properties, where compulsory purchase action has been agreed but not yet commenced, are being monitored to ensure that works or other actions agreed with the owner to bring the property into use are delivered in a timely way.
- 16.7 In addition to the 29 empty properties already approved for potential compulsory purchase action, the progress being made by the owners of other long term empty properties continues to be closely monitored to ensure they are brought back in to use. Where progress continues to be very slow or non-existent, the Assistant Director Planning has delegated authority for properties to be added to the compulsory purchase list following consultation with the Portfolio Holder and Ward Councillors.
- 16.8 Council Tax has been granted a Charging Order to enforce the sale of a long term empty property located in Kempston to recover Council Tax debts. The sale of this property will result in it being returned to use following renovation.
- 16.9 The work done in contacting owners and reviewing options with them has enabled the Council to form a clearer view of the overall picture. The existing CPO programme will result in a reduction of 29 empty homes in the Borough, representing just over 6% of the currently recorded 459. The majority of the remaining 430 properties will be unoccupied for legitimate reasons. It is estimated that approximately 85% fall into this category. Estimates of the number of properties empty for legitimate reasons are as follows:
- Owners are working to bring them back in to use (50%)
 - The property is for sale or sold awaiting occupancy (15%)
 - Probate issues are being resolved (10%)
 - The owner has vacated the property to receive or provide care (10%)
- 16.10 In addition it has been estimated that a further 3% cannot be brought back in to use unless the circumstances of the owners change in ways that are beyond the Council's influence. Examples include dwellings located within the grounds of the owner's main home with no separate access; annexes to existing properties ('granny flats') or flats above shops which do not have a separate access and it would not be practical to create one
- 16.11 This suggests that a target figure for the number of empty properties should be approximately 400.

16.12 60 properties (13%) have been identified as unlikely to come back in to use without direct intervention from the Council

16.13 The Council has also focussed on public sector properties:

- Works have now completed on 1-4 St Paul's Square, Bedford providing 10 homes.
- Three Council properties linked to other services but no longer required by them have been brought into use for homeless people. A further seven properties have been identified in this category and discussions with service departments are in progress. Work is currently being actively progressed at Monks Loft. This will ultimately provide an estimated additional 3 units of supported accommodation.
- Of 11 properties owned by community schools 10 are occupied by site agents or being used by school staff and 1 is not suitable to use as family housing due to its location within the grounds.
- Work is continuing to bring back into use flats over shops in the bus station area following the completion of the bus station redevelopment.
- Endsleigh House has recently been purchased from Bedford Hospital by a private sector developer and landlord based in Bedford. It is hoped this building will be brought back in to use to provide good quality well managed accommodation but the Council has not yet seen any proposals.
- The Council is monitoring Housing Association properties which are the subject of redevelopment or re-modelling.

16.14 The high profile local television reports in 2014 following the Council's announcement that it had created a budget of £2.89 million to bring empty homes back in to use, has formed a platform for a publicity campaign to encourage owners of empty properties to bring them back in to use. The campaign to date has consisted of:

- The production of a Communications Plan including the promotion of awareness of key events in the delivery of the empty homes programme.
- Posters have been displayed in a number of bus stops throughout the Borough during the summer.
- 'Real time' displays were run at the bus station and at a number of bus stops which have this facility.
- Pull up banners have been prominently displayed in various locations throughout the Borough. These are currently on display in the Borough Hall Reception, the Central Library and Wootton Library.
- Postcards have been produced and will be sent to all owners of properties empty for over 2 years, reminding them of the advantages of bringing their properties back in to use and the powers available to the Council if they do not.
- Further press enquiries relating to the Council's empty homes programme have been received. The significant reduction in the number of long term empty homes reported, received considerable interest in the local press. It was the main story on the front page of the 28 January 2016 edition of the Times & Citizen and was also reported on page 6 of the 31 January 2016 edition of Bedfordshire on Sunday. This interest has helped to maintain the profile of the ongoing publicity campaign.

17. Options to Increase Housing Delivery: Self Build and Custom Build Housing

- 17.1 The Self Build and Custom Housebuilding Act 2015 received Royal Assent on 26 March 2015. This places a duty on Local Authorities to create a Register of self-builders and custom builders. The Council has launched its register.
- 17.2 Self-build are projects where someone directly organises the design and construction of their new home. This covers quite a wide range of projects.
- A traditional 'DIY self-build' home, where the self-builder selects the design they want and then does much of the actual construction work themselves.
 - Projects where the self-builder arranges for an architect/contractor to build their home for them.
 - Projects that are delivered by kit home companies (where the self-builder still has to find the plot, arrange for the slab to be installed and then has to organise the kit home company to build the property for them).
 - Community-led projects where members of the community often do all the organising and often quite a bit of the construction work.
- 17.3 Custom build homes are where a specialist developer helps deliver the home. This is more of a 'hands off' approach and the customer may get less of a say in the design and layout of the home. It also de-risks the process for the person who is seeking to get a home built.
- 17.4 Self-build and custom build have moved on quite a lot from the days of groups struggling to keep together while a number of homes were built directly by the members. Building technology changes have made a difference and the level of actual self-build and small scale commissioning varies a lot. The Council's focus would not be 'grand designs' style dream houses but the aim would be to make housing affordable to self-builders who could not otherwise be able to buy a house. The other aim is to build capacity in the house building sector and support SMEs. A new type of custom build developer has emerged over the last two years, and these organisations take on most of the gritty issues for you – everything from securing or providing a site in the first place, through to managing the construction work and arranging the finance.
- 17.5 At present (mid 2013) there are about a dozen specialist custom build developers active in the UK. They range from large nationwide companies that are planning to help hundreds of people to get the custom build homes they want every year, through to smaller local firms delivering just a handful of properties each year. One or two custom build developers also provide a menu of custom build options – for example, they may offer to sell a serviced building plot (that the customer takes over and organises everything on); or they might offer to build a home to a watertight stage (so that the customer can then finish it off and fit it out).
- 17.6 The Council is reviewing the availability of sites which might be suitable and could be considered. Some of the sites may be too small for HAs, or for many house-builders - and better suited for self-builders. Self-builders expect to pay for the sites but what is important to them is to have a vendor who will support the process they go through to deliver their schemes

- 17.7 Another option is to identify a plot where a developer creates the road and services and markets self-build plots. The developer would secure a reserved matters approval for the layout and some other aspects of the development as necessary. The Council could seek to identify sites that could be brought forward in this way through S106 agreements but this could have an impact on viability negotiations.
- 17.8 It is possible that the Government will follow up the Self Build and Custom Housebuilding Act 2015 with measures to cause Local Authorities to make sites available for self-build and custom build.



18. Action Plan

18.1 A revised Action Plan for 2016-2020 has been compiled and is given below. This replaces the Action Plan contained within the Housing Strategy 2012 -2017.

	Timescale	Priority	Performance Measures (Qualitative/ Quantitative)	Resources	Responsible Team
THEME 1 - HOUSING NEEDS AND THE HOUSING MARKET					
1.1 Revise the Strategic Housing Market Assessment (SHMA) as a tool to understand housing needs, demand and affordability. Extend the period covered by the SHMA to 2035 to align with extension of Local Plan period.	2016/17	High	SHMA updated to cover period to 2035 issued	Staff time	Housing Strategy/ Planning Policy
1.2 Update JSNA Housing Chapter	Ongoing	Medium	Chapter updated	Staff time	Housing Strategy/ Operational Housing
1.3 Draft housing policies for Local Plan 2035	2016/17	High	Housing policies for local Plan 2035 are drafted in line with the LP delivery timetable	Staff time	Housing Strategy/ Planning Policy
1.4 Carry out review of Allocation Scheme annually	Ongoing Annually	High	Allocations Scheme Revised Annually	Staff time	Housing Strategy/ Operational Housing
1.5 Carry out review of Tenancy Strategy annually	Ongoing Annually	High	Tenancy Strategy reviewed annually	Staff time	Housing Strategy/ Operational Housing
1.6 Maintain focussed liaison with RPs and prioritise partnerships that increase investment capacity	Ongoing	High	Relationships maintained. Investment capacity increased	Staff time	Housing Strategy/ Operational Housing
1.7 Develop web based guidance on affordable housing provision	2016/17 Dependent upon detailed analysis of the Housing and Planning Act 2016 and the issuing of relevant directives by the Secretary of State.	High	Web based guidance on mix and tenure requirements published	Staff time	Housing Strategy
1.8 Continue to ensure allocated schemes are deliverable in viability terms including	Ongoing	High	Viability appraisals dealt with in a timely manner	Staff time	Housing Strategy

	Timescale	Priority	Performance Measures (Qualitative/ Quantitative)	Resources	Responsible Team
Processing and agreeing of viability assessments as they are submitted Contribute to the overall viability assessment of the Local Plan 2035	In line with Local Plan 2035 timetable	High	Overall Viability appraisal for Local Plan 2035 delivered in line with LP timetable	Staff time Consultancy fees	Housing Strategy/ Planning Policy
1.9 Custom Build Establish and maintain Register	2016/17	High	Register established	Staff time	Housing Strategy
Identify opportunities to support custom build through the planning process, through supporting access to land and through facilitating partnerships	2017/18 In line with Local Plan 2035 timetable	Medium	Planning policy and/or opportunities arising through development management identified	Staff time	Housing Strategy

THEME 2 - THE PROVISION OF AFFORDABLE HOUSING AND DELIVERY OF GROWTH

2.1	Deliver 256 affordable homes per year	Ongoing	High	Target reached	Staff time Capital Programme budget	Housing Strategy
2.2	Aim for 195 homes to be provided for Affordable Rent.	Ongoing	Medium	Aim reached	Staff time Use of AH commuted sums to achieve higher AR percentage	Housing Strategy
2.3	Continue to work with the development industry and Registered Providers to bring forward the identified strategic development sites in a sustainable form	Ongoing	High	Development sites progressing	Staff time	Housing Strategy
2.4	Report on the benefits and costs of establishing a Housing Company. If approved, set up the company. Assess options for procurement of housing stock for the Housing Company (if approved and established) including potential to acquire empty homes and use the Council's own land holdings to develop new homes.	2016/17 2016/17	High High	Report to Executive If approved, establish a Housing Company. Assessment of council owned development opportunities undertaken	Staff time. Consultancy Fees Staff time. Start-up costs Consultancy fees	Housing Strategy / Property Services/ Legal/Finance

		Timescale	Priority	Performance Measures (Qualitative/ Quantitative)	Resources	Responsible Team
2.5	Maintain programme of delivery of urban sites including: Kingsway, Ford End Road and Dallas Road. Contribute to the delivery of the TCAAP. Manage forward the delivery of the One Public Estate project	Ongoing	High	Urban Sites progressed and delivered in a timely manner	Staff time Masterplan consultancy fees	Housing Strategy/ Property Services/ Economic Development
2.6	Work to maximise investment from Registered Providers and from the Homes and Communities Agency	Ongoing	High	Registered Providers and HCA engaged Funding from HCA secured for priority non S106 sites	Staff time	Housing Strategy
2.7	Work with Registered Providers and Parish Councils to deliver housing in the rural area including housing to meet local needs.	Ongoing	Medium	Parish Councils and rural housing providers engaged with	Staff time	Housing Strategy

THEME 3 - MAKING BEST USE OF THE EXISTING HOUSING STOCK

3.1	Investigate measures to increase energy efficiency improve adaptability to climate change and reduce fuel poverty. Work with partners to maximise benefits to Bedford Borough of emerging energy efficiency programmes and existing programmes.	Ongoing	Medium	Carbon emissions and fuel poverty reduced	Staff time	Housing Strategy/ Operational Housing/ Environment Services (Sustainability Team)
3.2	Provide (subject to budget limitations) grant assistance to enable adaptation of existing properties	Ongoing	High	Disabled Facilities Grants provided to qualifying persons subject to resources.	Staff time, Capital Programme budget	Adult Services / Property Services
3.3	Deliver the Empty Homes Action Plan	Ongoing	High	Empty Homes Action Plan delivered	Staff time, Capital Programme budget	Housing Strategy
3.4	Review Empty Homes Strategy	2017/18	Medium	Empty Homes Strategy reviewed	Staff time	Housing Strategy
3.6	Review the Private Sector Housing Strategy	2017/18	Medium	Private Sector Housing Strategy Revised	Staff time	Housing Strategy
3.7	Review policy on licensing of Houses in Multiple Occupation (HMO) that are licensed.	2015/16	Medium	Policy reviewed.	Staff time	Environmental Health
3.8	Support the development of the Private Rental Sector in Bedford and engage with it positively whilst continuing to use powers available to the Council to support high standards and tackle rogue landlords.	Ongoing	High	Support effective	Staff Time	Environmental Health / Operational Housing / Housing Strategy

	Timescale	Priority	Performance Measures (Qualitative/ Quantitative)	Resources	Responsible Team
THEME 4 – HOMELESSNESS AND MEETING THE NEEDS OF VULNERABLE PEOPLE					
4.1 Work with partners to ensure the housing needs of vulnerable people are met by an integrated approach. Support development of integration of health and social care by development of accommodation strategies for vulnerable groups	Ongoing	High	Housing Chapter of Joint Strategic Needs Assessment updated. Work in response to Care Act 2014 supported through co-ordinating housing group. Strategies developed as detailed below	Staff time	Housing Strategy/ Operational Housing
4.2 Develop Older Person Accommodation Strategy	2017/18	High	Strategy delivered and issued	Staff time	Housing Strategy/ Operational Housing
4.3 Develop Mental Health Accommodation Strategy	2016/17	High	Strategy delivered and issued	Staff time	Housing Strategy/ Operational Housing/ Adult Services
4.4 Develop Learning Disabilities Accommodation Strategy	2016/17	High	Strategy delivered and issued	Staff time	Housing Strategy/ Operational Housing/ Adult Services
4.5 Develop Physical Disabilities Accommodation Strategy	2018/19	High	Strategy delivered and issued	Staff time	Housing Strategy/ Operational Housing
4.6 Improve provision for victims of domestic violence	2019/20	Medium	Improved provision in place	Staff time	Housing Strategy/ Operational housing
4.7 Finalise GTAA and identify site for Gypsy and Traveller accommodation as required	2016	High	GTAA Finalised and issued Sites to meet the needs of G & T communities identified if required by the study		Housing Strategy

Housing Strategy 2012-17

December 2012



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About this Document

This document sets out the Borough Council's Housing Strategy for the period 2012-2017. It was adopted as policy by the Borough Council's Executive on 12th September 2012.

Chapter 1 (Introduction) explains why it is important to have a strategy and the role that the Borough Council has in meeting the housing needs of its residents.

Chapter 2 sets out the background to the strategy and the factors that need to be taken into account such as changes to government policy, changes to the population and climate change. It also highlights that for the strategy to be realised, the Council needs to work effectively with all of its partners at both national and local level and with both public and private sector providers. This chapter also provides a summary of the key housing issues facing the borough.

Chapter 3 sets out a vision for the strategy and lists eleven objectives which will assist in the delivery of that vision.

Chapters 4-7 set out the four main themes of the strategy. These are:

- Housing Needs and the Housing Market
- The Provision of Affordable Housing and Delivery of Growth
- Making Best Use of the Existing Housing Stock
- Homelessness and meeting the Needs of Vulnerable People

Each theme is structured in the same way. Firstly the objectives which relate to each theme are identified along with main data sources which support the strategy. Each theme is then explored in more detail and each chapter ends with a list of detailed issues facing the Borough, a list of key actions to try and address these issues and a list of key partners that the Council will work with to deliver those actions. The extent of existing resources is also set out.

1. Introduction

- 1.1. This document provides the housing strategy for Bedford Borough Council for the period 2012-17. It succeeds the previous strategy and has been fully revised to take into account changes to funding at both national and local level as well as updated assessments of housing need within the borough. It also provides an opportunity for the council to review its housing priorities and to identify key actions which need to be put in place in order to deliver these.

Why have a Housing Strategy?

- 1.2. The Borough Council and its partners have a key role to play in meeting the housing needs of the borough's citizens in particular those vulnerable members of the community. The public housing sector is undergoing radical change in terms of funding, how rent levels are set, and general management. We need a Housing Strategy which takes full account of the government's housing agenda.
- 1.3. As a housing authority, Bedford Borough Council has an obligation to assess the housing conditions in its area and to formulate strategies to address any issues that are identified. The council transferred its housing stock to Bedfordshire Pilgrims Housing Association (BPHA) in 1990. However it still retains a role as a strategic and enabling authority along with a number of statutory responsibilities in relation to housing (particularly in respect of homelessness), housing need and the development of a housing strategy.

In addition Bedford Borough Council has:-

- Powers and responsibilities to promote balanced housing markets through planning measures to deliver new affordable housing
 - Enforcement powers against owners of unfit or empty properties
 - A role in tackling crime and poverty through its many partnerships
 - Legal responsibilities to respond to and prevent homelessness together with the duty to provide advice to landlords, tenants and others
- 1.4. This strategy will explain how the council will balance these different roles as well as setting out its priorities. Whilst it is recognised that housing markets and needs may change over time, it is also important to establish a strategic direction and set plans and targets for improving housing circumstances in the short to medium term.
- 1.5. The purpose of the housing strategy is therefore to:
- Outline the main national, regional and local housing priorities that will affect Bedford Borough over the next five years
 - Provide a strategic framework to assess the current and future balance of housing supply and needs

- Involve local communities, partners, stakeholders and customers in developing housing plans and services
- Identify housing priorities for action and options for delivery
- Identify investment needs and available resources
- Guide local action to plan for the effective prevention and intervention in the housing market and to ensure that best use is made of those resources available to both the council and its partners

1.6. As well as this overall housing strategy the council has a legal duty to develop and publish:

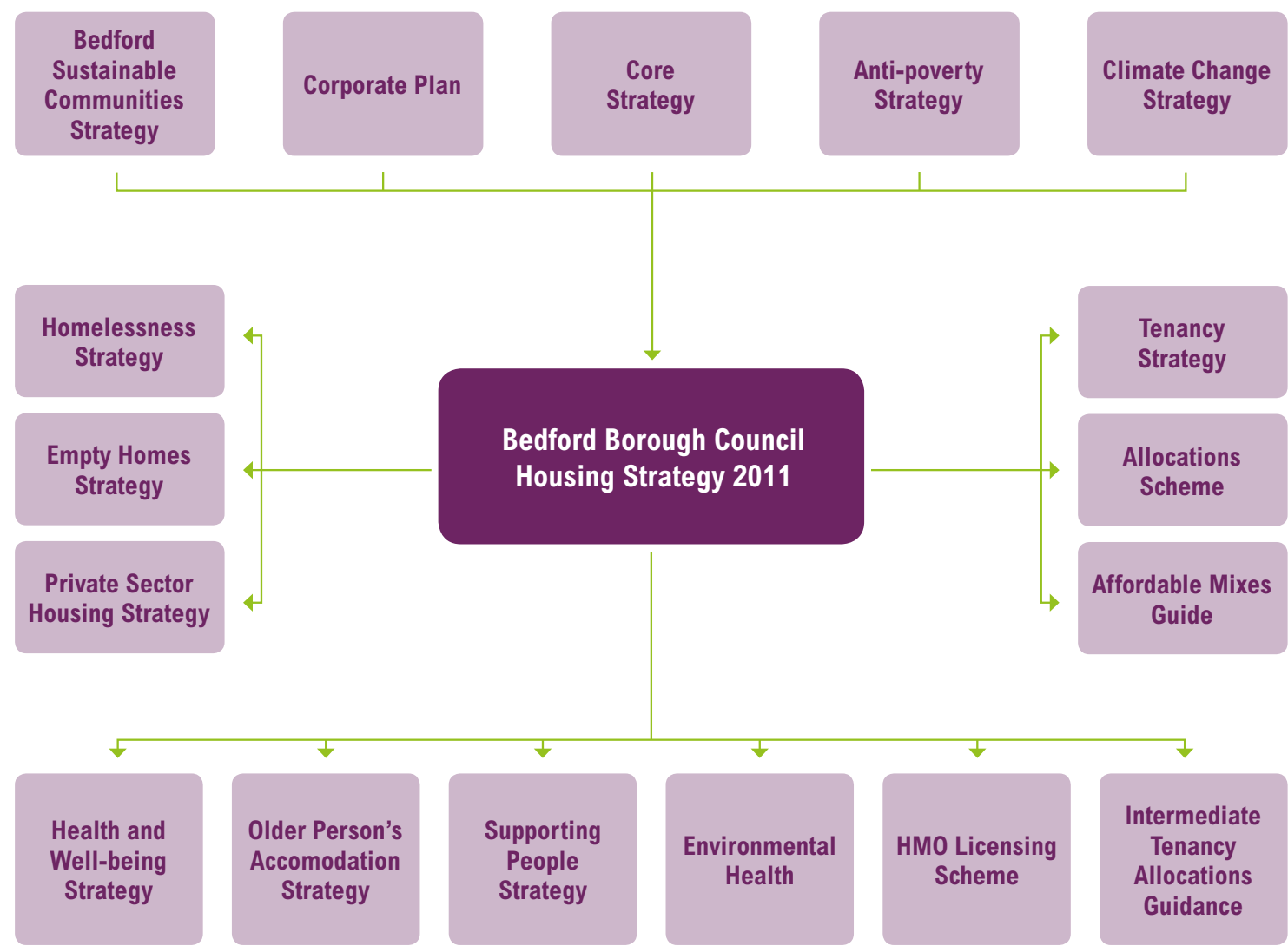
- A Homelessness Strategy (to be reviewed 2012/13) – which will provide a detailed plan for tackling and preventing homelessness, reducing rough sleeping and presenting the housing options available to people
- An Allocations Scheme (currently being reviewed) – which sets out how social housing is allocated including the choice based lettings system and will have to include the way in which the council responds to the flexibilities included in the Localism Act
- An assessment of the needs of Gypsies is being re-visited following new government guidance
- A Tenancy Strategy (to be developed and published by April 2013) - which will reflect how the council will approach the new flexible tenancies proposed in the Localism Act
- A Private Sector Housing Strategy (to be reviewed 2014/15) - which sets out how the council will act on the issues identified in the House Condition Survey and its policy on offering grants to improve the condition of private housing

1.7. The Council also produces strategies and policies relating to particular issues including:

- The Affordable Housing Mixes Guide for developers
- Sub-regional Intermediate Tenures Allocation Guidance for Shared ownership and Intermediate Rent housing
- Older Persons Accommodation Strategy which addresses issues facing this important and growing group which overlap housing and adult social care
- Health and Well Being
- Supporting People

Figure 1 on the following page shows the Housing Strategy's relationship with other strategy and policy documents that the Council produces.

Figure 1: Housing Strategy Relationship to Other Strategies and Policies



Consultation

- 1.8. This strategy was the subject of consultation with key stakeholders and members of the community between 26th March and 21st May 2012.

Equality Analysis

- 1.9. An Equality Analysis has been undertaken on this strategy to ensure that equality and diversity have been fully recognised and embedded.

Background and Key Housing Issues for the Borough

2.1. In devising this housing strategy a number of factors have been taken into account and which have influenced and shaped its direction. These are:-

Growth

Delivering growth in the overall housing market and especially affordable housing within that, is essential both to meet housing needs and to deliver the aspirations for the borough set out in the Sustainable Communities Strategy

Demographic Change

The borough faces significant demographic changes. In particular the growing population of older people will require a response both through support for people in their existing homes and the provision of specialised accommodation

The National Economic and Policy context

Reductions in public expenditure make it all the more vital that public sector resources are used effectively and additional resources are brought in wherever possible. Significant changes are underway in government policy which will touch on all aspects of housing

Relationships with Partners

Managing relationships with partners is always important. As Bedford is a non-stock holding authority most of the housing strategy will only be delivered through successful relationships with partners

Climate Change

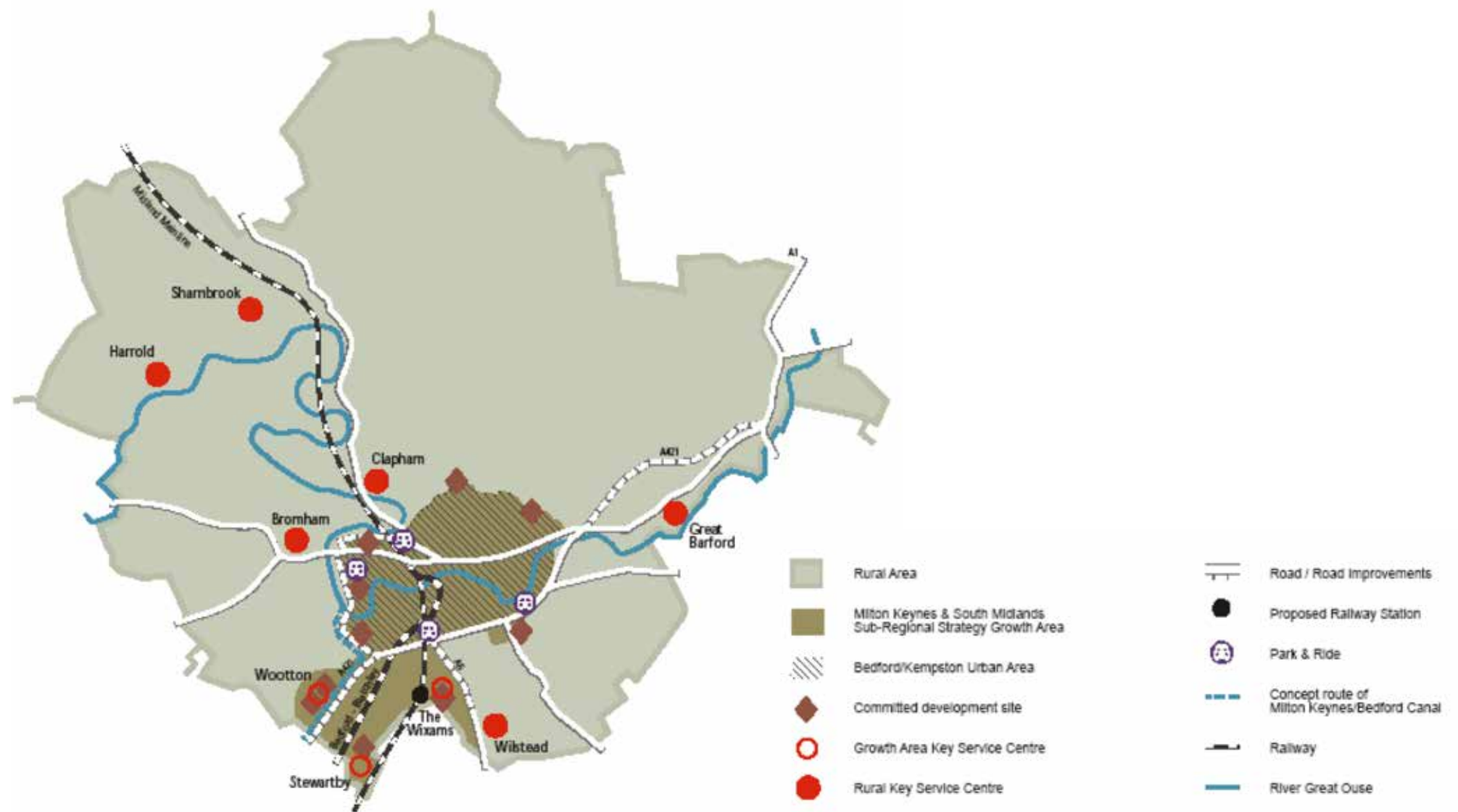
Meeting the challenge of climate change is vital particularly in relation to reducing carbon emissions, improving energy efficiency and reducing fuel poverty and adapting to the possible impacts of climate change

Each of these will be dealt with in turn.

Growth

2.2. The council's growth aspirations are set out in its adopted Core Strategy and Rural Issues Plan which provides the spatial strategy for the borough up to 2021. It defines the Growth Area (Bedford, Kempston and the northern Marston Vale) and seeks to make provision for 16,270 additional dwellings within that area between 2001 and 2021. Within the remainder of the borough which is known as the Rural Policy Area the plan makes provision for a further 1,300 additional dwellings.

Figure 2: Key Diagram Showing Growth Area, Committed Development Sites and Rural Key Service Centres



Source: Core Strategy and Rural Issues Plan 2008

- 2.3. Most of this growth has already been committed through allocations or the granting of planning permission. This includes the new settlement at Wixams and major urban extensions at Great Denham and land west of Kempston. Due to the economic downturn, timescales for implementation of the Core Strategy and Rural Issues Plan may need to be revisited but this remains a key framework document for housing development in the borough. An Area Action Plan for Bedford Town Centre has also been adopted. This includes a number of redevelopment opportunities where residential use may be appropriate as part of mixed use development.
- 2.4. The council is also in the process of preparing an Allocations and Designations Plan which allocates additional housing sites as well as strategic employment sites to assist with the regeneration of Bedford's economy. The provision of Gypsy and Traveller Sites is being taken forward in a separate development plan document¹. The Core Strategy and Rural Issues Plan will need to be reviewed to look at how the borough will grow beyond the 2021 period and preliminary work is underway.
- 2.5. Alongside the homes and jobs that are the building blocks of new developments, infrastructure is being put in place to ensure that these are successful communities that enhance the life and the prosperity of the borough. This includes transport and services networks and other essential community facilities. To assist this, the council has developed a Local Investment Plan which covers the period 2011-2014. This identifies key investment priorities in homes, jobs and infrastructure. This is a working document and is subject to ongoing review.
- 2.6. The Bedford Sustainable Community Strategy (SCS) was developed by the Bedford Borough Partnership and covers the period 2009-2021. It sets out seven themes for a thriving, greener, aspiring, healthy, safer, inclusive and growing borough and good quality, affordable housing underpins all of these objectives.
- 2.7. Housing and transport is a key theme in its own right. The goal set out in the SCS is: 'A borough where the supply and quality of housing and transport is capable of supporting the needs and aspirations of the borough's population now and in the future.' To achieve this goal, the Bedford Borough Partnership aims to:
- Promote the construction of sufficient energy efficient new homes, transport and infrastructure to support the growing economy and population and which can adapt to climate change;
 - Improve the transport, community and public infrastructure of the whole borough to support the economy, population and housing;
 - Improve housing and transport for vulnerable people to promote their independence;
 - Maintain and improve the condition of all existing housing and transport, including its energy efficiency and adaptability to climate change; and
 - Tackle the problems of air quality in the borough.

Aims 1, 3 and 4 flow through this housing strategy and are picked up in its four main themes.

1. In October 2012 in the light of carrying out a revised Gypsy and Traveller Accommodation Assessment and the grant planning permission at Kempston Hardwick and Meadow Lane, the Council decided not to pursue a Gypsy and Traveller Sites Plan.

Bedford Borough Key Facts

Bedford Borough covers an area of 48,000 hectares that includes the urban area of Bedford and Kempston and 46 rural parishes

The housing stock grew from 62,078 in 2002/3 to 64,835 in 2007/8. Over 60% of the stock is detached or semi-detached houses (this is close to the figures for Bedfordshire and Luton Sub-Region and the Eastern Region) while the proportion of flats is slightly higher at 16% compared to 14%

Of these homes 39,360 (70.5%) are in the urban area and 16,500 (29.5%) are in the rural area. (Source: House Condition Survey 2011)

Nearly two thirds (65%) of households are owner occupiers, 18% live in the private rented sector and 17% of households live in social housing. (Source: House Condition Survey 2011). These are close to the national averages of 68%, 14% and 18% respectively (Source: English House Condition Survey 2008)

The breakdown of property types is 5,290 (9.5%) flats, 13,100 (13.4%) terraced houses, 6,430 (11.5%) bungalows, 18,510 (33.1%) semi-detached houses, and 12,530 (22.5%) detached houses. (Source: House Condition Survey 2011)

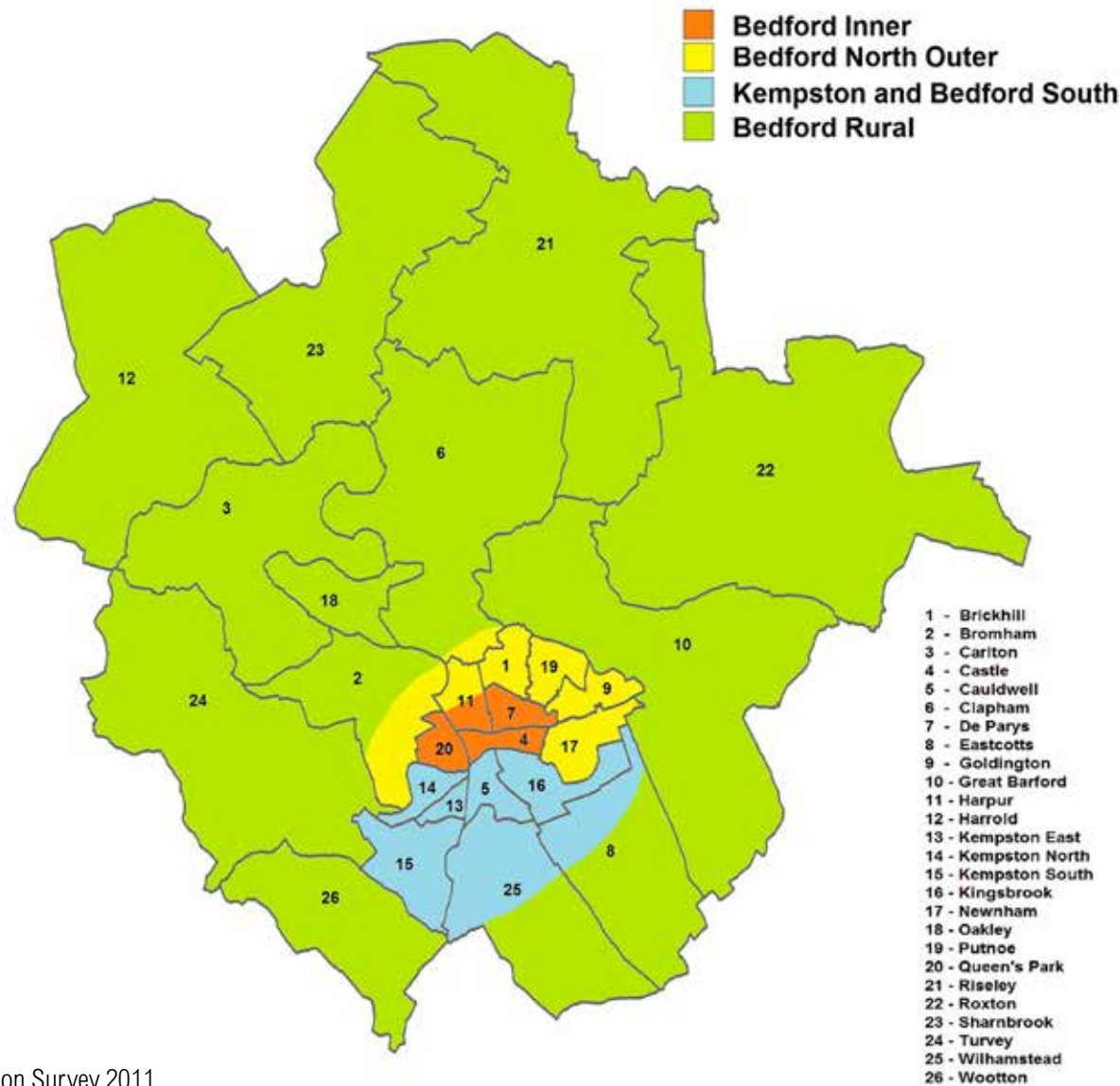
Table 1 shows the breakdown of tenure by 4 Bedford Borough sub-areas. The largest proportion of owner-occupiers is in the rural area of Bedford. The largest proportion of households who privately rent is in Bedford Inner.

Table 1 Tenure proportions by sub-area

Area	Owner Occupied	Privately Rented
Bedford Inner	64.6%	35.4%
Bedford North Outer	84.6%	15.4%
Kempston and Bedford South	67.3%	32.7%
Bedford Rural	89.9%	10.1%
Bedford Private Sector Stock	78.2%	21.8%

Source: 2011 House Condition Survey

Figure 3: Map showing areas as defined for the House Condition Survey 2011



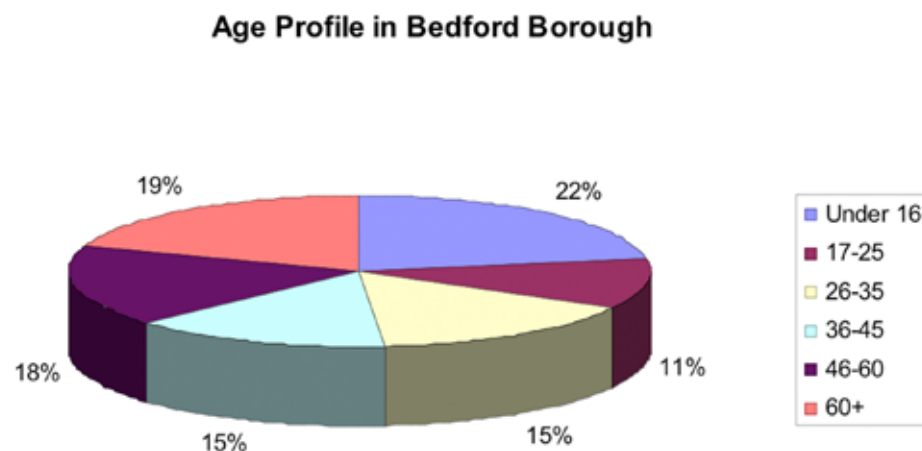
Source: House Condition Survey 2011

Note: since the survey was carried out, some of the ward boundaries have changed.

Demographic Change

- 2.8. Between 1981 and 2009, the Bedford Borough's population grew by 19.2%. This is above both the Bedfordshire and Luton Sub-Regional average of 18.7% and the Eastern Regional average of 18.8%. These increases compare to an increase of 10.7% for England and are indicative of the pressures on the borough and the wider area.
- 2.9. In 2001 the borough's population was 148,100 and formed into 59,600 households. The mid-year estimate for 2010 indicates that the population has increased to 158,000. The distribution of household types is close to the national average with slightly more couples and couples with children and slightly fewer pensioners. Once the 2011 census data is available, this will provide a more up to date picture of demographic change.
- 2.10. The population aged 65+ is however predicted to rise by 59% between 2010 and 2030. The change is even more marked with regard to older groups. The population aged 80-84 will rise by 74% and the population 85+ will rise by 123%. This compares to an increase of 14% across the population as a whole within the same period.
- 2.11. Figure 4 shows the age profile of Bedford Borough. 22.1% of Bedford Borough's population is under the age of 16. This is slightly higher than both the regional (21.3%) and national (21.4%) figures. 19.4% of Bedford Borough's population is over the age of 60. This compares with a regional figure of 21.4% and a national figure of 20.8% (Census 2001 data).

Figure 4 Age Profile of Bedford Borough



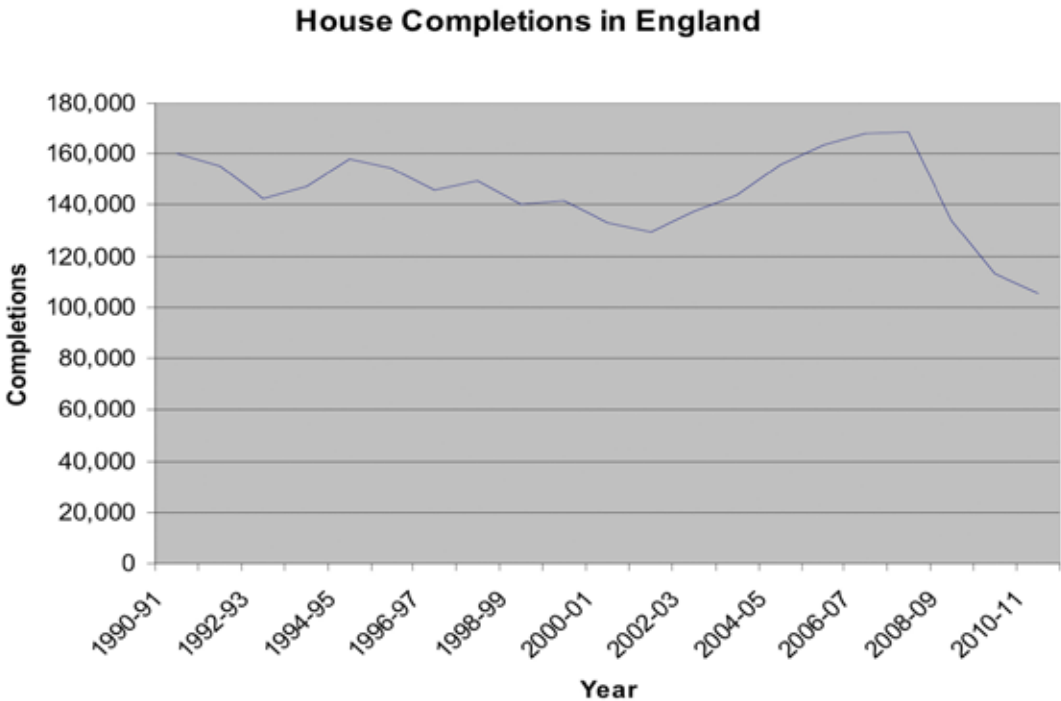
Source: Census 2001 statistics

- 2.12. In 2001, the average household size in Bedford Borough was 2.44. It is now predicted that average household size is not falling as previously expected.
- 2.13. Ethnic minorities make up 19.2% of the population, the largest group being Asian or Asian British (7.7%) followed by White non-British (6.2%). The black and minority ethnic (BME) population of Bedford is growing. At the time of the census in 2001 BME groups comprised 16% of the population compared to a national average of 13.5% (Office for National Statistics). The BME population includes almost 60 different ethnic groups. The main ethnic minority languages spoken are Italian, Urdu, Bengali, Hindi, and Punjabi.
- 2.14. Vulnerable households (defined by government in relation to households in receipt of certain benefits) in non-decent dwellings were estimated to form 31% of private sector households with the highest concentration in the private rented sector in the inner area of Bedford where 76.1% of vulnerable households live in non-decent homes. (Source: House Condition Survey 2011). See paragraph 6.6 for definition of the Decent Homes Standard.
- 2.15. The average score from the Index of Multiple Deprivation for Bedford Borough in 2010 was 17.78. In terms of ranking, the Borough was 169th out of 326 local authorities in England. However three Lower Super Output Areas (LSOAs) in Bedford ranked in the national top 10% of the most deprived LSOAs. These were located in Castle, Harpur and Cauldwell wards. (Source IMD Tables 2010 CLG).
- 2.16. The Housing Register in Bedford had 3120 applicants at the 31st March 2011. Bedfordshire Homefinder, a Choice Based Lettings system operating across the historic county was introduced in 2009. In 2010/11, the council received 212 homelessness applications and accepted a re-housing duty for 107 of these households. This figure must be seen in the context of the simultaneous increase in the number of cases where homelessness was prevented through interventions and support by the Housing Options team which totalled 294 in 2010/11. Bedford Borough Council had not used bed and breakfast between November 2003 and October 2011 however due to recent demand it has been necessary to use it for emergency placements.
- 2.17. The Bedfordshire Joint Strategic Needs Assessment (JSNA) was published by NHS Bedfordshire and Bedfordshire County Council in 2008 then disaggregated and republished in a Bedford Borough version in 2010. It is currently under review and will be revised in 2012. Housing has a key role in supporting the council's health and well-being objectives. This applies both to providing an adequate supply of affordable housing to meet general needs and to providing for vulnerable groups with special needs.

The national economic and policy context

2.18. The economic context is critical to the state of the housing market and the quality and cost of housing that is available in Bedford.

Figure 5: House completions in England 1990/91 – 2010/11



Source: CLG Live Tables

- 2.19. Figure 5 shows that following the boom in the period to 2007 housebuilding across England slumped to the lowest level since 1991. Even the 1991 figures were low by historic standards. In 1970 there were 291,793 house completions in England (Source: UK Housing Review). The figure for 2010/11 was 105,930.
- 2.20. The increased levels of construction between 2001 and 2007 were not sufficient to prevent rising house prices and an increasing earnings to house prices ratio. The average house price for Bedford recorded by the Land Registry peaked at £177,587 in January 2008. In June 2011 the average stood at £151,390 – a level last seen in 2004.

- 2.21. The credit crunch and economic downturn have had a profound effect on housing investment and growth in Bedford and on the housing choices of individuals, particularly those entering the housing market for the first time. Nationally, the typical loan-to-value ratio for first time buyers fell from 90% in the first quarter of 2007 to 77% in the third quarter of 2010 (Source Council of Mortgage Lenders). Perhaps surprisingly the median age of first time buyers has remained fairly constant at 29 but the Council of Mortgage Lenders estimates that many first time buyers are paying a deposit equivalent to a whole years earnings and that the proportion of first time buyers under 30 reliant on help from parents and other relatives rose from 38% in 2005 to 84% in 2009.
- 2.22. The result of this is that market demand, and the availability of mortgage finance, rather than land supply or the planning system is the key constraint on the delivery of new housing in Bedford. Activity has resumed on the key strategic sites around Bedford and steady progress is being made but a faster rate of build would be possible if supported by market conditions.
- 2.23. In contrast to many areas the planning system in Bedford has supported the release of sites for development. This has included clear policies that give developers and land owners certainty but also provide appropriate flexibility in the face of the economic downturn. Because it was able to deliver development in recent years, the Borough benefited from public investment through the Homes and Communities Agency, which sustained the delivery of affordable housing during the economic downturn. The government's deficit reduction programme and the consequent reductions in public expenditure will have a significant impact both on models of service and delivery.
- 2.24. Funding available to support the development of new housing will be at a lower level. Finance for home improvements in the private sector will be more limited. Funding for services to the homeless and other vulnerable groups will also be reduced. The Supporting People budget has been reduced and will no longer be ring-fenced (a change that was already in hand under the previous government). The council is therefore challenged to find ways of successfully addressing the housing issues that face the borough within the context of the reduced availability of public expenditure.

Housing Policy

- 2.25. In November 2011 the government published "Laying the Foundations : A Housing Strategy for England". Key aims set out in the document are:
- To "unlock the housing market" to "drive local economies and create jobs". The government calculates that each new home creates two jobs for a year
 - To "spread opportunity" so that "people who work hard and play by the rules can expect to own a decent home of their own"

2.26. The Housing Strategy for England brought together a range of changes that have been introduced by the coalition government and which have been taken into account in this strategy. These include:-

- The proposed abolition of the regional tier of government means that direction from government through regional and sub-regional structures will now be replaced by a general obligation on local authorities to co-operate. As a consequence, resources will no longer flow from government through the Regional Housing Pot
- The New Homes Bonus has been created to assist communities in gaining benefits from new development and not just incurring costs
- The new “Affordable Rent” regime will be the principle focus of development funding through the Homes and Communities Agency (HCA) and will be the main type of new housing supply. Affordable rented homes will be made available to tenants at up to a maximum of 80% of market rent and allocated in the same way as social housing is at present. In the short-term delays caused by the introduction of the new Affordable Rent regime and the new programme management system have caused a major delay in starts on site which will have significant effects for the supply of affordable housing in 2012/13. Beyond that the Government’s and the Homes and Communities Agency’s intention is to increase the scale of the Affordable Housing Programme by drawing on the resources available to Registered Providers in the form of borrowing capacity created by the higher rental streams on their existing stock
- The HCA will have reduced resources. Greater reliance will be placed on income generated from rents both from new stock and new lettings in the existing stock. The Tenant Services Authority is to be abolished and regulation transferred to a Statutory Committee of the Homes and Communities Agency. For profit providers are to be allowed to register as affordable housing providers
- The Strategy acknowledges that the availability of credit is a key constraint on development and accords with experience in Bedford. The Strategy outlines an indemnity scheme to enable purchasers to move forward with a deposit of 5% rather than the 20% current sought by most lenders. Recognising the credit availability problems for business, some additional funds have been identified including the Growing Places Fund channelled through Local Enterprise Partnerships and the Get Britain Building fund channelled through the Homes and Communities Agency, but these are limited in scale and duration and do not involve any ‘new money’
- There will be flexibility over the length of tenancies that Registered Providers can offer in accordance with a Tenancy Strategy to be developed by the council. There is no longer a requirement to offer lifetime tenancies
- There will be greater flexibility over management of the waiting list and a new Homeswap exchange programme for tenants
- The local authority will be able to fully discharge its homelessness duty by offers of housing in the private rented sector

- The Government intends to make further changes, particularly in the area of taxation, to support the development of the private rented sector. The aim is to encourage large scale institutional investors into residential property. Housing Benefit reforms will affect the rents that the poorest households will be able to pay as benefits will be set at the 30th percentile of rents in the area rather than the median. Some groups including single person households under the age of 35 and larger families requiring 5 bedroom properties, are particularly affected by early changes but the major change that is planned is the switch to Universal Credit from 2013. The operation of these changes is only gradually becoming clear; government announcements and advice agencies should be monitored for further information
- There is a new focus on bringing empty properties back into use
- The commitment to Zero Carbon Homes from 2016 is reaffirmed. The government's key policy for improving the energy efficiency of homes is the Green Deal which relies on loans to fund improvements which will be repaid from the fuel bill

Localism

- 2.27. The localism agenda affects government organisation, government guidance and requirements, and the powers and obligations of local authorities. It is about devolving powers previously the domain of central government to local councils and to communities at the neighbourhood level.
- 2.28. The government is in the process of abolishing the regional tier of government and the Regional Spatial Strategies which included targets for housing and job growth. In future, local authorities will be tasked with deriving these targets locally based on local needs and local priorities. This will include a duty to cooperate with neighbouring councils.
- 2.29. The government has published the National Planning Policy Framework. The replacement of the existing suite of Planning Policy Statements with the new National Planning Policy Framework raises uncertainty over the future of planning policy for housing previously embodied in Planning Policy Statement 3. The Regional Spatial Strategy is scheduled to be revoked and a revised approach based on locally determined housing targets will take its place. This will require revision of the Strategic Housing Market Assessment. This change includes a requirement to review the needs of Gypsies and Travellers to reflect new government guidance.
- 2.30. The National Planning Policy Framework includes provisions for neighbourhood planning and the development of local plans. These changes create opportunities for local communities to plan their own development within the broader planning framework including the possibility of the provision of additional housing focussed on the provision of affordable housing.
- 2.31. The Government is introducing the Community Infrastructure Levy (CIL) which will partially or completely replace delivery of infrastructure through Planning Obligations (S106 agreements). Work is underway to prepare a draft charging schedule with a view to introducing CIL by April 2014.

Relationships with Partners

- 2.32. As Bedford is a non-stock holding authority most of the housing strategy will only be delivered through successful relationships with internal and external partners. Critical partners are:-

Borough Council Directorates

- 2.33. In 2009 the council became a unitary authority creating significant opportunities for integrated planning and service delivery. In 2011 a reorganisation saw operational housing integrated with adult services together with culture and leisure. The successful delivery of the council's housing strategy will require close co-operative working across the council's directorates. In particular implementation of many of the policies identified in this strategy will lie with the new Adult and Community Services.

The Bedford Borough Partnership

- 2.34. This brings together a wide range of agencies that play a vital role in Bedford. The Joint Strategic Needs Assessment completed in 2008 was a joint project by local authorities and the NHS in Bedfordshire to identify the health and wellbeing needs of the future local population. It noted the lack of affordable housing, the presence of poor quality housing and the impact that these have on health and well-being. The Joint Strategic Needs Assessment is now being refreshed and it is expected that this second iteration will lead to a marked improvement in the data available.
- 2.35. The Health and Well Being Board Strategy 2012 also reflected the importance of housing to health and well being. In considering the wider determinants of health in Bedford Borough it noted that the development of healthy and sustainable places and communities is a key objective and commented on the importance of delivering more affordable housing and tackling fuel poverty.

Neighbouring Local Authorities

- 2.36. The council works in a formal Housing Partnership with Luton Borough Council, Central Bedfordshire Council (the other two unitary authorities that make up the historic county of Bedfordshire) and four local Registered Providers. Research documents such as the Strategic Housing Market Assessment, the 2006 Gypsy and Traveller Accommodation Assessment and the Black and Minority Ethnic Needs Study currently in progress have been delivered through this Partnership. The Choice Based Lettings scheme for social rented housing in which the Borough participates operates across historic Bedfordshire. The role and resourcing of the Partnership ceased from April 2012.
- 2.37. Another important strategic relationship is the South East Midlands Local Economic Partnership. The council's commitment to the creation of homes, jobs and the infrastructure to support them is a unified commitment at the strategic level and this is also now reflected in the approach that is taken by the Homes and Communities Agency.

- 2.38. The council is committed to working co-operatively with neighbouring authorities and will be under a duty to co-operate as a result of the Localism Act. The implications of this and the changing economic environment will shape the ways in which the council's work with its neighbours develops

The Homes and Communities Agency

- 2.39 The changing role of the Homes and Communities Agency (HCA) is also important to the future of housing in Bedford. The HCA will have reduced funding and will focus in the coming years on facilitating housing provision and regeneration by supporting national programmes developed by its major Registered Provider partners and also by developers working in partnership with the HCA. The HCA is also working to a broader remit to consider the employment and infrastructure implications of its work in supporting growth and development.
- 2.40. In terms of HCA organisation Bedford now sits within the expanded Midlands Region and the council is looking forward to building the new relationships that this change will bring. Working with the HCA the council has developed a Local Investment Plan to bring together the major strategic objectives of the council that require investment in infrastructure and new homes and workplaces.
- 2.41. The participation of the HCA in the Bedford Housing Partnership is a welcome development.

Registered Providers

- 2.42. The council's stock was transferred to Bedfordshire Pilgrims Housing Association (BPHA) in June 1990. Since then, BPHA has developed as a successful Registered Provider. It is a lead partner with the Homes and Communities Agency and whilst delivering new homes in neighbouring local authorities is still very active in housing development in the borough. BPHA remains one of the council's preferred strategic housing partners and continues to operate the Housing Register in Bedford. Of the total social rented stock in Bedford 7539 (70%) is owned by BPHA and 3226 (30%) is owned by other Registered Providers.
- 2.43. The new funding arrangements place BPHA in a key position in Bedford. With reductions in government grants a higher proportion of the funds for new development will come from higher rents (the new 'Affordable Rents' – see section 5). Existing tenants will not have to pay these higher rents so long as they remain in their existing accommodation but many new and relocating tenants will. It is of great importance to the council that these higher rents which will be paid by Bedford citizens are re-invested in Bedford to deliver the additional homes that we need.
- 2.44. A number of other Registered Providers have developed in Bedford and have become important partners for the council. The following Housing Associations are currently active in Bedford: Affinity Sutton, Aldwyck, BCHA, Genesis, Granta/Metropolitan, Grand Union, Guinness South, Hastoe, Jephson, North Herts Homes, Orbit, Places for People, Raglan, Presentation Housing Association merged with Notting Hill Housing Trust who are seeking to transfer their properties in Bedfordshire to other providers.

- 2.45. All of these associations face challenges as a result of the new framework for funding development that the government has introduced. They all face a period of being more reliant on their own resources and less reliant on grants from government. The way that Registered Providers respond to that challenge will be significant to the future of housing in the borough. We look forward to working with them as they address those challenges to continue to provide affordable housing in Bedford.
- 2.46. The Council works with Registered Providers through the Bedford Housing Associations Liaison Group, now being re-launched as the Bedford Housing Partnership. Work with partners including Registered Providers and the Homes and Communities Agency on development issues will be carried forward through a Bedfordshire and Luton Developers Forum.

The Development Industry

- 2.47. The Borough's growth programme cannot be delivered without the active engagement of developers. The council has sought to create a clear policy framework and, within that framework, to be flexible and creative in bringing forward developments that meet the aspirations of the developers and the Council. Where appropriate, provision will be secured through S106 agreements. The government is also considering whether affordable housing can be funded in part via the application of the Community Infrastructure Levy (CIL).
- 2.48. The relationship of the development industry to the provision of affordable housing is also changing. Developers can now become partners with the Homes and Communities Agency and have access to funding that is still available.

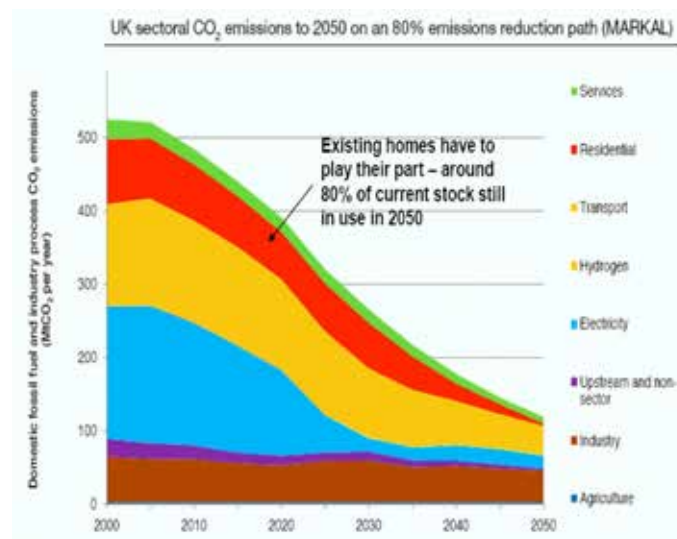
The Private Rented Sector

- 2.49. After many years of decline in the last century there is once again a growing private rented sector. Nationally it has grown from 8% to 12% of all households. Both the last government and the present government have expressed interest in encouraging the revival of the private rented sector that has occurred in recent years and there were changes in the 2011 budget to facilitate this. The Rugg Report (2008) identified a series of customers and roles for the Private Rented Sector (PRS) which are economically and socially important: -
- Young professionals, whose presence in the prs reflects a complex amalgam of choice and constraint;
 - Students, whose needs are increasingly being met by larger, branded, institutional landlords;
 - The housing benefit market, where landlord and tenant behaviour is largely framed by housing benefit administration;
 - Slum rentals at the very bottom of the prs, where landlords accommodate often vulnerable households in extremely poor quality property;
 - Tied housing, which is a diminishing sub-sector nationally but still has an important role in some rural locations;
 - High-income renters, often in corporate lettings;
 - Immigrants whose most immediate option is private renting;
 - Asylum seekers, housed through contractual arrangements with government agencies;
 - Temporary accommodation, financed through specific subsidy from the department for work and pensions; and
 - Regulated tenancies, which are a dwindling portion of the market.
- 2.50. The Rugg Report challenged some myths about the private rented sector. It noted that the Survey of English Housing has consistently found that tenants' satisfaction with their landlord in the private rented sector is higher than in the social rented sector. In 2006 those very or fairly satisfied formed 76% compared to 70% for the social sector; 11% were slightly or very dissatisfied compared to 19% in the social sector. These are national figures and may also reflect expectations. It also found that tenant satisfaction with small landlords was not significantly different to attitudes to large landlords.
- 2.51. The development of buy to let has tended to improve the overall condition of the private rented sector but it continues to perform poorly. The Bedford House Condition Survey 2011 found that approaching half (43.7%) of private rented sector homes failed the decent homes standard compared to under a fifth (18.8%) of owner-occupied homes.
- 2.52. The council has a significant role in enforcing standards through activity by Environmental Health Officers and offering loans to support improvements. It has also sought to engage with the sector through the landlord's forum and the tenant deposit guarantee scheme.

Climate Change

- 2.53. Responding to climate change has been identified as a key priority for the council. This is reflected in the Sustainable Community Strategy and the Corporate Plan and in the Climate Change Strategy 2010-12.
- 2.54. Nationally the UK Government is committed to achieving an 80% reduction in greenhouse gases relative to 1990 levels by 2050. Housing has a critical role to play in meeting national climate change objectives. To achieve the overall target emissions from housing have to be cut by 95%.

Figure 6: Projected UK CO₂ emissions to 2050 to achieve 80% reduction



Source: CLG MARKAL is a generic model tailored by the input data to represent the evolution over a period of usually 40 to 50 years of a specific energy system at the national, regional, state or province, or community level.

- 2.55. One important step to achieve this is zero carbon homes on new developments. Over recent years affordable housing has set standards of sustainability through the commitment of Registered Providers and the requirements of the Homes and Communities Agency. In future it will be important that standards are set for all housing through the planning system and Building Regulations to achieve zero carbon homes which are adapted to the future impacts of climate change. The council's Climate Change and Pollution Supplementary Planning Document sets out how this will start to be achieved.

- 2.56. Addressing the carbon footprint of new homes is important. However, the great majority of the housing stock that the citizens of Bedford will occupy in 2050 is already built. Addressing the energy performance of the existing stock is critical. 2050 sounds like a distant target but nationally this reduction has to be achieved at a rate of 625,000 homes per year to meet the target. This would translate into approximately 1,800 homes per year in Bedford Borough.
- 2.57. The council has in recent years been successful in securing funding from government and has delivered very successful programmes to support loft and cavity wall insulation with grants and the replacement of inefficient boilers through loans. Securing the funding is only the first part of the task. Making contact with households, explaining the schemes, putting the agreements in place and delivering the measures has to be done efficiently and effectively. Working with partners, in particular Street Energy, we have been able to achieve this.
- 2.58. There is more work to do to continue with these programmes but also to develop programmes that support improvements in the energy performance of homes with solid wall construction. This will generally mean external cladding which is significantly more expensive than the measures taken so far and will be a challenge but the carbon reduction targets will not be met unless solid wall construction houses are dealt with. Micro-generation also has a role to play particularly in rural areas that are off-gas.
- 2.59. The funding for these programmes will not come from central government funds in the way that it has in the past. The new approaches will involve the Green Deal, Energy Company Obligations and Feed in Tariffs. The council will have an important role in bringing these elements together to deliver them locally.
- 2.60. The Green Deal is part of the Energy Bill and is being used by the government to establish a framework to enable private firms to offer consumers energy efficiency improvements to their homes, community spaces and businesses at no upfront cost, and recover payments through instalment charges on the energy bill. An important issue for the Council is the role that it will seek to play in delivery of the Green Deal.
- 2.61. In summary, the following are key issues facing the Borough: -
- Meeting the needs of an increasingly elderly population both in their existing homes and in specialist accommodation
 - Delivering growth in the overall number of dwellings to match predicted growth of the population
 - Delivering affordable housing in uncertain and weak market conditions.
 - Adapting to the reduced level of funding available to assist the delivery of affordable housing
 - Achieving reductions in the carbon footprint of both new homes and the existing stock and reducing fuel poverty and increasing the adaptability of homes to climate change.
 - Facing the consequences of reductions in funding for grants and services to the homeless and vulnerable groups.
 - Managing the impact of Affordable Rent and revised tenancy regimes on those seeking housing in the Borough
 - Building on successful partnerships within the council and with outside agencies

3. Vision and Objectives

3.1. Having given the background in Section 2, it is now appropriate to set out the vision and objectives for this housing strategy.

Vision

“To meet the existing and future housing needs of our communities by working with partners to deliver growth whilst embracing changes to the funding of affordable housing, tackling homelessness, understanding the needs of vulnerable groups, upgrading the existing housing stock in terms of liveability and energy efficiency, and developing an approach to allocations and tenancies which is tailored to local needs”

3.2. In order to achieve that vision, the following objectives have been identified:

1. Gather and evaluate evidence about housing needs within the Borough including housing conditions and the needs of different age cohorts, vulnerable groups, household types, rural and urban households, black and minority ethnic households, both now and in the future.
2. Develop a robust approach to allocations and tenancies that meets the needs and priorities of the borough and maximises the use of available resources.
3. Work to deliver a range of housing that offers quality and choice and in particular to deliver additional affordable housing that meets identified needs within sustainable communities including working to deliver affordable housing through the planning system.
4. Work collaboratively with developers, RSLs, funding agencies and other partners to bring forward the development of strategic sites.
5. Ensure that the Borough responds to changes to the funding of affordable housing, maximises access to available funding and uses resources effectively.
6. Encourage rural communities to identify housing needs and work with them to deliver local needs housing.
7. Work with partners to improve the fabric of the existing stock in particular to improve energy efficiency, reducing the carbon footprint of the existing stock, increasing adaptability to climate change and reducing fuel poverty.
8. Target long term empty homes and bring these back into beneficial use.
9. Prevent homelessness through the provision of housing advice and through identifying housing options for persons at risk of homelessness.
10. Plan for the implications of an aging population including supporting people in their existing homes and providing specialist accommodation.
11. Support the adaptation of existing homes and the provision of new homes that are accessible to people with different abilities.

3.3. These objectives can be grouped under the 4 main themes of:-

- Housing Needs and the Housing Market.
- The Provision of Affordable Housing and Delivery of Growth.
- Making Best Use of the Existing Housing Stock.
- Homelessness and meeting the Needs of Vulnerable People.

These are now dealt with in turn.

4. Theme 1 - Housing Needs and the Housing Market

Key Objectives

- Gather and evaluate evidence about housing needs within the Borough including housing conditions and the needs of different age cohorts, vulnerable groups, household types, rural and urban households, black and minority ethnic households, both now and in the future.
- Develop a robust approach to allocations and tenancies that meets the needs and priorities of the borough and maximises the use of available resources.

Data Sources

4.1. The following data sources are important to assessing housing needs and formulating strategies to address those needs:

- Strategic Housing Market Assessment: the key data source which models households against housing supply and takes into account affordability
- Strategic Housing Land Availability Assessment
- House Condition Survey: this gathers data on households as well as house condition
- English Housing Survey: this is relevant to provide an over-view and for comparison with the local level
- Housing Register: a regularly updated register of those who have applied for housing with a Registered Provider
- Housing Needs Team Performance Data: this includes housing advice and assistance, homelessness prevention and statutory homeless applications
- Home Buy Agent: applications for Intermediate Tenures
- Registered Providers
- Records on lettings and sales
- CORE: a national continuous recording system for social lettings
- Gypsy and Traveller Accommodation Assessment: this identifies the specific needs of this group
- Annual Monitoring Returns on housing delivery
- Housing Strategy Statistical Appendix (HSSA) returns of affordable housing delivery
- Ward Profiles

Strategic Housing Market Assessment

- 4.2 The Strategic Housing Market Assessment (SHMA) was carried out at the level of the historic county of Bedfordshire. Key results were broken down to local authority and/or housing market level. The Bedford housing market area was closely contiguous with the borough boundary although it extended further south into Central Bedfordshire. Small and relatively sparsely populated areas within Bedford Borough were not included in the Bedford housing market area but fall either within the Northampton market area or within the Huntingdon and St Ives market area.
- 4.3. The study was carried out over a three year period 2007-2010. The baseline data for the study is therefore 2007. The study also relied in part on 2001 census data. This data has been partially updated within the context of the SHMA and has been reviewed for this housing strategy. The need for updating and review is considered below.
- 4.4. Using a predictive model based on secondary data sources in accordance with the guidance the SHMA found that 16% of households are unsuitably housed as defined in CLG guidance¹. This equates to 9,800 households. The largest concentrations of unsuitably housed households are in Castle, Cauldwell, Goldington, Kempston South, Kingsbrook, and Queens Park wards. It should be noted that not all those unsuitably housed require re-housing; improvements and adaptations in their existing home may resolve the problem.
- 4.5. Household projections in the Strategic Housing Market assessment (SHMA) were based on figures provided by Bedfordshire County Council and Luton Borough Council which were linked to assumptions created as a result of the Regional Spatial Strategy.
- 4.6. The current Core Strategy and Rural Issues Plan was prepared in accordance with the East of England Plan and includes a significant growth aspiration which due to current economic conditions is unlikely to be met. The review of the Core Strategy and Rural Issues Plan (or the preparation of a Local Plan in accordance with the draft National Planning Policy Framework) will need to consider the impact of the economic slowdown for future population projections and growth rates. A range of new growth assumptions will also need to be considered for the post 2021 period

¹ CLG Strategic Housing Market Assessment Practice Guidance definition of Unsuitable Housing

Homeless households or insecure tenure	Homeless households.
	Households with tenure under notice, real threat of notice or lease coming to an end; housing that is too expensive for households in receipt of housing benefit or in arrears due to expense.
Mismatch of housing need and dwellings	Overcrowded according to the 'bedroom standard'.
	Too difficult to maintain (eg too large) even with equity release.
	Couples, people with children and single adults over 25 sharing a kitchen, bathroom or WC with another household.
	Households containing people with mobility impairment or other specific needs living in unsuitable dwelling (eg accessed via steps), which cannot be made available in-situ.
Dwelling amenities and condition	Lacks a bathroom, kitchen or inside WC and household does not have the resources to make fit (eg through equity release or grants).
	Subject to major disrepair or unfitness and household does not have the resources to make fit (eg through equity release or grants).
Social needs	Harassment from others living in the vicinity which cannot be resolved except through move.

4.7. The housing requirement identified for Bedford, consistent with the East of England Plan, including tenure mix, is shown in Table 2:

Table 2: Bedford Borough Housing Requirement - New Dwellings 2007-2021 – Strategic Housing Market Assessment

	Dwellings	%	Dwellings	%
Market Housing			8,800	62.8%
Intermediate Tenures	1,500	10.5%		
Social Rented Housing	3,800	26.7%		
All Affordable Housing			5,300	37.2%
Total			14,100	100.0%

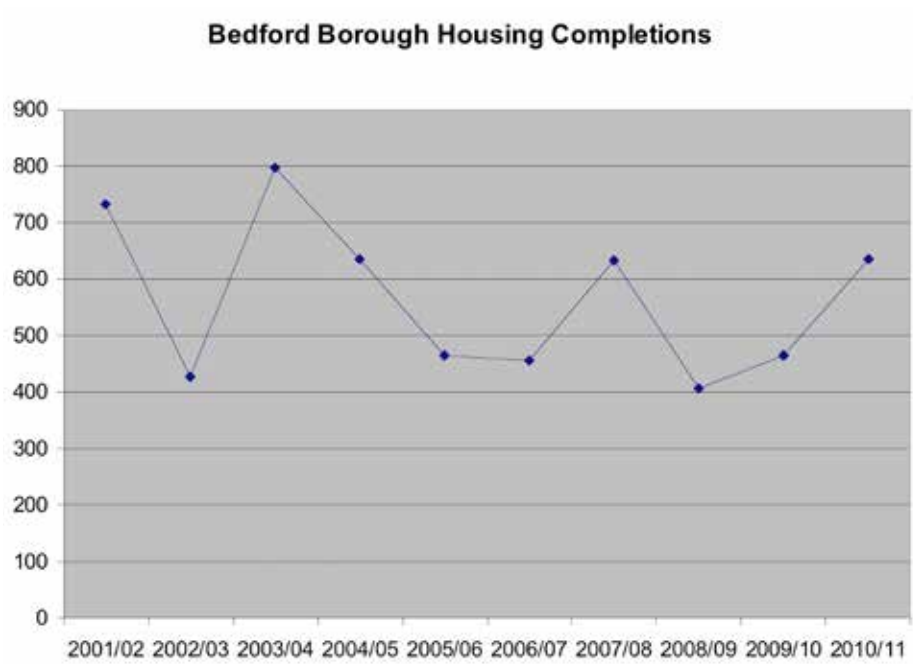
Source: Bedfordshire and Luton SHMA 2011

- 4.8. The SHMA considered what was meant by ‘affordability’, and based its analysis on the two practice guidance benchmarks of an income multiplier of 3.5 for mortgages for first-time buyers and renters spending no more than 25% of income on housing costs. House prices were based on Land Registry data and private sector rents on a 5.9% yield from buy-to-let properties. Social rented sector properties were assumed to be let at target rents (a formula created by central government) but it was assumed that Housing Benefit makes all social rented properties affordable.
- 4.9. Most significantly the house price to earnings ratio was adjusted to the long-term trend. This means that the fundamental assessment of affordability is not affected by fluctuations in house prices over time.
- 4.10. The SHMA identified a need based requirement of 37.2% of new dwellings to be affordable, split into 26.7% social rented housing and 10.5% intermediate tenures.
- 4.11. Intermediate Tenure takes a variety of forms. The most common is shared ownership - with the purchaser buying a share that is commonly about 40% of the value and paying a rent based on the value retained by the provider. Another form is Intermediate Rent – set at 80% of market rents this is priced in the same way as Affordable Rent introduced in 2011. See below Paragraph 4.16.
- 4.12. SHMA analysis showed that the primary concern in the provision of intermediate tenures should be with households earning under £25,000 p.a. and particularly with households earning between £15,000 and £20,000. The report’s conclusion that 60% of intermediate tenure provision should be aimed at households earning under £25,000 and that 40% should be aimed at households earning under £20,000 was more than justified by the modelling. The SHMA analysed the costs of shared ownership to the purchaser and found that it would be unlikely that the costs would be low enough to meet these objectives. It concluded that greater reliance would have to be placed on Intermediate Rent.

Changes since the research date of the SHMA

4.13. Since the publication of the SHMA the council has revised the population projections on which the SHMA findings were based to take account of the 2006 household projections and also the likely effect of demand on completion rates. Major sites in the growth area coming on stream in 2008 have delivered more slowly than forecast when the research for the SHMA was undertaken as a result of the economic downturn, figures for completions from 2007 to 2010 have become available. Completion rates for the period 2001-2010 are shown in Figure 7.

Figure 7: Bedford Housing Completions 2001-2010



Source: Annual Monitoring Report

- 4.14. When these revised projections and completions are entered into the SHMA model this affects not only the overall numbers but also the distribution across tenures. The residual requirement can be recalculated as follows:

Table 3: Bedford Borough Housing Requirement - New Dwellings 2010-2021.

Revised requirement using revised completion and projections data

	Dwellings	%
Market Housing	6,000	61.1%
Intermediate Tenures	1,600	16.6%
Social Rented Housing	2,200	22.3%
All Affordable Housing	3,800	38.9%
Total	9,900	100.0%

Bedford Borough Council SHMA model adjusted for revised completions and projections

Figures may not sum due to rounding

- 4.15. This revision has two implications:-

- Firstly, the revised calculations show a slightly increased requirement for affordable housing from 37.2% to 38.9%. This requirement continues to more than justify the council's planning policy of requiring 30% affordable housing on residential development sites. Implementation of the policy on affordable housing is therefore constrained by viability concerns rather than the assessment of need
- Secondly, it indicates a revised balance of social rented and intermediate housing within the overall affordable housing total from 72% Social Rented and 28% Intermediate Tenure to 57% Social Rented and 43% Intermediate Tenure. However, this balance needs to be further reviewed in the light of the government's introduction of Affordable Rent

Affordable Rent

- 4.16. As mentioned above, the government has announced the introduction of the new Affordable Rent regime within which rents can be set at up to 80% of market rents. The Homes and Communities Agency has invited Registered Providers to reach programme agreements for a four year period (2011-2015) to include the provision of new Affordable Rent properties and the conversion of a proportion of existing social rent properties to Affordable Rent. Local authorities have been consulted but do not have a veto over this process.

- 4.17. Registered Providers can still opt to deliver social rented housing however the HCA's expectation is that this will be exceptional and will be funded using other resources such as free land from local authorities.
- 4.18. It is the government's intention that Affordable Rents will enable Registered Providers to deliver an increased supply of housing at less cost to the tax-payer. A Registered Provider may also generate additional resources by selling existing properties which do not fit well within its Asset Management Strategy. This may be because they are outliers from the main concentrations of the Registered Provider's Housing stock or because they are expensive to bring up to the Decent Homes standard (see 6.6). The council is consulted over disposals but again does not have a veto.
- 4.19. As they are set at 80% market rent Affordable Rents will vary between properties and between areas as they do in the private market.
- 4.20. The new Affordable Rent will be eligible for housing benefit. Many tenants of social rented housing already rely on housing benefit. The Affordable Rent will increase reliance on housing benefit.
- 4.21. The effect of the increase on flats will be limited as the new Affordable Rents will include service charges. The effect on larger family homes will be much more marked.

Table 4: Comparison of estimated typical Social Rents with estimated typical Affordable Rents

Comparison of typical Social Rent with typical Affordable Rent

	Estimated typical Social Rent exc. Service Charge	Estimated typical Affordable Rent exc. Service Charge	Estimated typical Affordable Rent inc. Service Charge
1 bed flat	£75	£82	£96
2 bed flat	£85	£92	£109
2 bed house	£94	£119	£124
3 bed house	£107	£139	£143
4 bed house	£119	£156	£161
5 bed house	£125	£173	£178

Source: Bedford BC based on data provided by Registered Providers

Affordable Rent and Intermediate Tenures

- 4.22. Within intermediate tenures, there are a range of products which require different levels of income and deposit to be affordable. Equity sharing schemes such as First Buy require a purchaser able to afford 80% market value and the associated deposit. Shared Ownership schemes require a purchaser who can afford 25% - 50% market value and the associated deposit. At the most affordable end of the range at the time of the SHMA was Intermediate Rent which required no deposit and was based on setting rents at 80% of market rents.
- 4.23. The formula for Intermediate Rent was the same formula as will now be used for Affordable Rents. While allocations policies differ, households that were anticipated to require Intermediate Rent will now need Affordable Rent. A key question in establishing the need for Affordable Rent is the proportion of households that fall into this category because they are unable to afford shared ownership. In this way the balance between social rent and intermediate tenures is affected by the introduction of Affordable Rent which post-dates the Strategic Housing Market Assessment (SHMA).
- 4.24. The SHMA set a target that 60% of Intermediate Tenures should be affordable to households earning under £25,000p.a.
- 4.25. Evidence is available from two sources: (1) the HomeBuy Agent (an agency appointed by the government to promote shared ownership schemes) which gathers data on income levels of household applicants and (2) BPHA which is the largest provider of shared ownership housing in the borough and has data on income levels of successful households.
- 4.26. The HomeBuy Agent data on applicants (Table 5) shows that 53% of the proportion of applicants applying for shared ownership earn under £25,000.

Table 5: Shared ownership Applicants by Income

Home Buy Agent Applicants by Income	
< £20,000	39%
£20,000 - £25,000	14%
£25,000 - £30,000	15%
£30,000 +	32%
Total	100%

100% Source: Home Buy Agent (331 households)

- 4.27. However, a full income analysis has not been carried out at application stage and not all of these applicants are successful with lower income applicants being disproportionately likely to be unable to proceed. When successful applicants to BPHA are considered the proportion of successful applicants earning under £25,000 falls to 37%.
- 4.38. The completions data (Table 6) shows 37% of households earning under £25,000. When this is compared to the target proposed in the SHMA (60%) this suggests that if the Intermediate offer excludes rented properties and focuses only on shared ownership and equity sharing there will be a 23% shortfall in availability of intermediate tenures to households with incomes under £25,000. The Council has worked with Registered Providers to consider how the proportion of successful applications from the under- £25,000 group might be increased. This can be done by reducing the initial share (typically 40%) or by reducing the rent on the unsold equity. Even with grant available at pre 2011 levels this was difficult to achieve and sustain the viability of schemes. In the new financial context the prospects for improving this position will be limited and so it is reasonable to take this level of take-up of shared ownership into account in assessing supply requirements.

Revised balance of tenures within Affordable Housing

Table 6: Household Income - Shared Ownership Completions

Shared Ownership Completions by Income	
< £20,000	19%
£20,000 - £25,000	18%
£25,000 - £30,000	20%
£30,000 +	43%
Total	100%

Source: BPHA (138 households)

- 4.29. As was recognized in the SHMA it is unlikely that the Shared Ownership offer can be adjusted to fill this affordability gap. More realistically this gap is an indication of the element within the Intermediate Tenures market that required Intermediate Rent and now require Affordable Rent
- 4.30. This shortfall is therefore taken to represent the element that required Intermediate Rent but must now be added to the total that require Affordable Rent.
- 4.31. The revised housing requirements model (Table 7) shows that of the 3,800 affordable homes required 1600 were intermediate tenure and 2,200 social rent. If Intermediate Rent is not available as an intermediate tenure 23% of 1600 - i.e. 368 - should be deducted from Intermediate Tenure and added to the rented requirement.

Table 7: Revised Affordable Housing requirement to include Affordable Rent

**Bedford Borough Housing Requirement - New Dwellings 2010-2021
- Revised for Affordable Rent**

	Dwellings	%
Market Housing	6,000	61.1%
Intermediate Tenures	1,232	12.4%
Social Rented Housing	2,568	25.9%
All Affordable Housing	3,800	38.9%
Total	9,900	100.0%

Source: SHMA model adjusted for revised completions and projections and to include Affordable Rent

Figures may not sum due to rounding

- 4.32. The resulting balance of tenures within affordable housing between Shared Ownership and Affordable Rent that is required is therefore 32.4% Shared Ownership (1,232) and 67.6% Affordable Rent (2,568). Although it is not enshrined in policy it has been the council's practice for many years to seek an optimum mix of 66% social rent and 34% intermediate tenures on residential development sites. Further research will be needed into the impact of Affordable Rent but evidence at present suggests that until further data becomes available the council should seek to preserve its 2:1 Affordable Rent: Shared Ownership ratio.

- 4.33. The council's approach to affordable housing provided through the planning system will continue to be constrained by viability considerations which will affect the tenure balance within affordable housing as well as the overall level of provision. In conclusion, there is no immediate need to revise the proportions of social/affordable rent and intermediate/shared ownership housing set out in the SHMA in the light of the introduction of Affordable Rent.
- 4.34. Once the Affordable Rent system is established, and as its implications become clearer, it will be necessary to consider revisions to the SHMA model.

Overall level of affordable housing

- 4.35. The overall delivery of housing is dependent upon a range of factors but particularly it is dependent upon market conditions.
- 4.36. Within that context the number of affordable homes that will be delivered over the following five years is dependent on a number of specific factors including the following:
- That there is a significant supply of sites with planning permission for which the affordable housing contribution has been agreed
 - Viability considerations may constrain delivery on some sites
 - The availability of grant to support the delivery of affordable housing
 - The impact of the introduction of Affordable Rent

- 4.37. Pending the Core Strategy and Rural Issues Plan review the affordable housing target to be applied to residential development sites will remain at 30%.
- 4.38. The existing target for affordable homes delivery is 200 per year. The council has succeeded in meeting or exceeding this target since 2007/08. This has been assisted by high levels of grant availability. Schemes in the pipeline mean that some of the benefit of this public expenditure will be felt into 2011/12
- 4.39. We will maintain the target at 200 affordable homes per year for three years and review the target in the light of the operation of the Affordable Rent regime in practice and the significant reduction in grant funding from the Homes and Communities Agency (HCA).

Dwelling Size Requirement

- 4.40. The SHMA also considered the dwelling size mix that is required. The SHMA noted in carrying out this analysis that there is a high level of under-occupation. The SHMA analysis of the position at 2007 found that 55% of single person households live in dwellings of up to four rooms (a four room dwelling would typically be a two bedroom flat) but 45% of single people live in dwellings with 5 rooms or more. Nearly half of these live in dwellings with six rooms or more.

4.41. The following table gives the size mix requirement for Bedford for the period 2007-2021.

Table 8: Size mix requirement 2007-2021

Size Mix Requirement 2007-2021		
Market Housing	Dwellings	%
1 bedroom	700	7.4%
2 bedrooms	1,700	19.7%
3 bedrooms	4,600	52.2%
4 bedrooms	1,500	17.2%
5+ bedrooms	300	3.5%
Total	8,800	100.0%
Affordable Housing	Dwellings	%
1 bedroom	2,100	41.3%
2 bedrooms	1,800	35.0%
3 bedrooms	1,100	21.5%
4 bedrooms	100	1.8%
5+ bedrooms	-	0.4%
Total	5,100	100.0%
All Housing	Dwellings	%
1 bedroom	2,800	19.9%
2 bedrooms	3,600	25.4%
3 bedrooms	5,700	40.8%
4 bedrooms	1,600	11.5%
5+ bedrooms	300	2.4%
Total	14,100	100.0%

Figures may not sum due to rounding.

Source: Bedfordshire and Luton SHMA and Bedford Borough Council

The size requirement for Affordable Housing breaks down as follows:

Table 9: Size mix requirement: affordable housing

Size Mix Requirement 2007-2021 - Affordable Housing Breakdown		
Social Rented Housing	Dwellings	%
1 bedroom	1,800	49.1%
2 bedrooms	1,000	27.5%
3 bedrooms	800	21.5%
4 bedrooms	100	1.8%
5+ bedrooms	-	0.4%
Total	3,700	100.0%

Intermediate Housing	Dwellings	%
1 bedroom	300	20.8%
2 bedrooms	800	55.5%
3 bedrooms	300	21.5%
4 bedrooms	-	1.8%
5+ bedrooms	-	0.4%
Total	1,400	100.0%

Figures may not sum due to rounding.

Source: Bedfordshire and Luton SHMA and Bedford Borough Council

- 4.42. Further research is required to establish that this global requirement for smaller dwellings matches the priority housing need that affordable housing should be designed to meet. It is important that supply is matched to need as far as possible.
- 4.43. Access to social housing is no longer through allocation by a housing officer but through the Choice Based Lettings system. This groups applicants into four bands. Bands 1 and 2 have very high priority. Band 4 has no priority. The great majority of applicants fall into Band 3 and have different levels of need which are recorded within the system. Properties are advertised as they become available, prospective tenants express preference for properties that are of interest to them through a “bidding” system, and decisions are primarily based on the priority of the applicant.

- 4.44. There is scope to use data on preferences as expressed by bid numbers although this will only show levels of demand for types of property and locations that are available. Location of applicants is also an important factor. The size of dwellings required by applicants with different levels of need within Band 3 is also a potential important indicator.
- 4.45. The Localism Act introduces greater flexibility for local authorities over its allocations policy. The council's allocations process is currently managed by BPHA and the council's allocations policy and BPHA's allocations policy are essentially the same. This will need to be reviewed in the light of the Localism Act and the changing environment. This review will also require consultations with Central Bedfordshire Council and Luton Borough Council on the Choice Based Lettings Scheme.
- 4.46. The Localism Act also introduces flexibility over the nature and length of tenancies. Whereas tenancies for life have been the norm this will no longer be assumed. The council will be required to develop a Tenancy Strategy in consultation with its partners and, if different types of applicant are to have different types of tenancy, this will need to be related to the revised allocations policy.

Partnership

- 4.47. Partnerships are critical to delivering decent homes for all in Bedford. The Council operates a successful Bedford Housing Associations Liaison Group. The Council will work to build on this success and has re-launched the Bedford Housing Associations Liaison Group as the Bedford Housing Partnership and will seek to engage Registered Providers and other providers and agencies with an interest in housing in the work of the Partnership.

Key Issues facing the Borough

Key issues in relation to this theme are:-

- When the Strategic Housing Market Assessment is updated to take account of revised population projections, this still supports the need for a high proportion (38.9%) of new dwellings to be affordable
- There is uncertainty over the delivery of affordable housing: delivery through the planning system is constrained by viability of developments at a time when public funding is very limited
- The balance between social rented and intermediate housing is changing with greater emphasis on the latter. This is likely to change further with the introduction of Affordable Rent
- Shared ownership plays a useful role in access to home ownership but only has a limited role in meeting the needs of lower income households
- The data points to a need for larger numbers of small units. This needs to be tested against demand through choice based lettings, housing options and homelessness services

Key Actions

1. We will:
 1. **Maintain the Strategic Housing Market Assessment (SHMA) as a tool to understand housing needs, demand and affordability including:**
 - Impact of Affordable Rent
 - Development of Intermediate Tenures
 - Role of Private Rented Sector
 2. **Update the model within the SHMA as necessary.**
 3. **Review the Council's approach to allocations including the allocations scheme and the Housing Register**
 4. **Devise and adopt a robust Tenancy Strategy**
 5. **Continue to support the Bedford Housing Partnership**
 6. **Review the size mix requirement when further data is available from choice based lettings**

Key Partners

- 4.48. These are:-
- The Homes and Communities Agency
 - Neighbouring Local Authorities where housing market areas cross local authority boundaries
 - Registered Providers
 - Developers
 - Private Sector Landlords

Resources

- 4.49. Staff time is a key resource primarily from Housing Strategy but also from Operational Housing and Planning Policy.

The Housing Strategy revenue budget (which is relevant to all four themes in the strategy) for 2012/13 is £104,670.

Funding will be required for consultants to support the updating of the Strategic Housing Market Assessment. This can be funded from the existing Plans and Strategies Reserve.

5. Theme 2 - The Provision of Affordable Housing and Delivery of Growth.

Key Objectives

- Work to deliver a range of housing that offers quality and choice and in particular to deliver additional affordable housing that meets identified needs within sustainable communities including working to deliver affordable housing through the planning system
- Work collaboratively with developers, RSLs, funding agencies and other partners to bring forward the development of strategic sites
- Ensure that the Borough responds to changes to the funding of affordable housing, maximises access to available funding and uses resources effectively
- Encourage rural communities to identify housing needs and work with them to deliver local needs housing

Data Sources

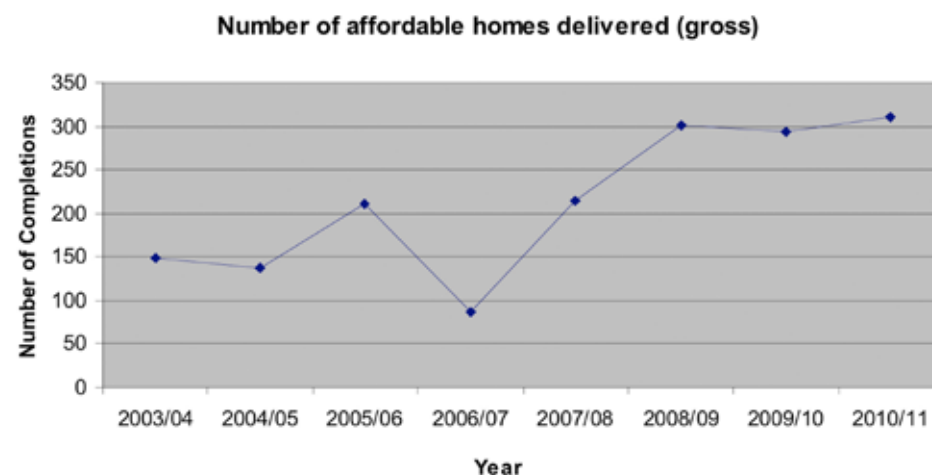
5.1. The following data sources are important when considering the provision of affordable housing and the delivery of growth.

- Housing Strategy Statistical Appendix
- Annual Housing Monitoring Reports
- Annual Monitoring Report
- Quarterly returns from Registered Providers on affordable housing delivery

Affordable Housing delivery

5.2. Delivery of affordable housing in Bedford Borough has improved significantly and has run at approximately 50% above the council's target of 200 homes per year for the past three years. 311 affordable homes were provided in 2010/11 of which 274 were new homes and 37 were purchases for shared ownership. During the economic downturn a high proportion of the new homes delivered were affordable. Affordable housing was also used to kickstart sites. There will be a process of catch-up as the market housing on these sites is delivered in the coming years.

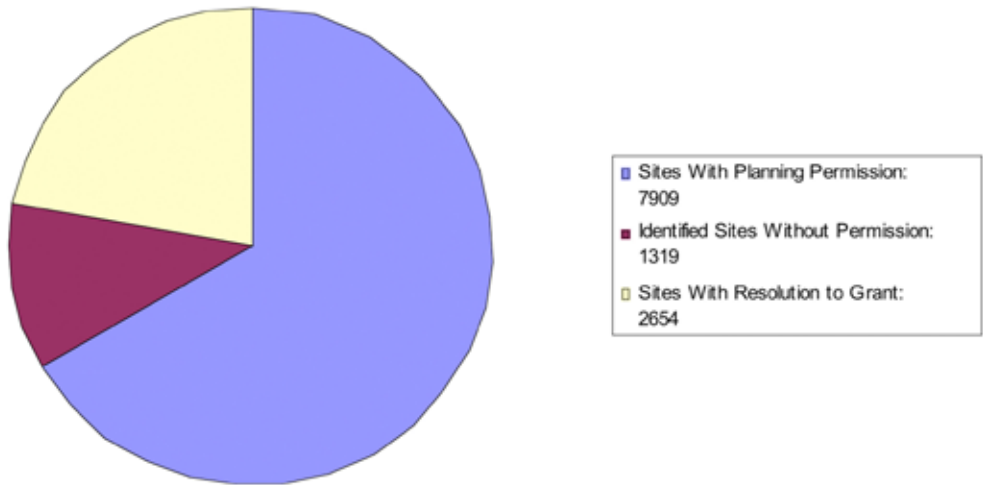
Figure 8 Number of affordable homes delivered



- 5.3. The council plays an important role in bringing together developers and Registered Provider partners. The need to provide affordable housing is balanced against the need to deliver infrastructure to support developments and to maintain the viability of developments.
- 5.4. The adopted Core Strategy and Rural Issues Plan and the Bedford Town Centre Action Plan provide a framework for growth up to 2021 and a requirement of 17,570 net additional homes. Of these, 16,270 are to be located in the Bedford Growth Area (Bedford, Kempston and the northern Marston Vale) and 1,300 in the Rural Area.
- 5.5. The council remains committed to this growth and the key focal points for development are the town centre, regeneration sites within the urban area, major urban extensions around Bedford and the Wixams new settlement to the south. Sites have been identified with a total capacity of 13,456 dwellings.
- 5.6. The strength of the land supply in Bedford is confirmed by the capacity of sites with planning permission (7,909 homes) or with resolution to grant (2,654 homes) Sites for a further 1,319 homes have been identified for housing but as yet do not have planning permission or a resolution to grant it.

Figure 9: Identified housing sites in Bedford Borough

Bedford Borough Housing Supply - Total: 11,882



Source: Housing Monitoring Report 2010/11

- 5.7. In addition, the council is undertaking an Allocations and Designations Plan process which will identify any additional housing sites that can be brought forward.
- 5.8. A map showing the major Strategic Sites is shown on the following page.



- 5.9. Overall progress in delivering against the housing target is below the trend required to hit the target as shown below. This is primarily a result of market conditions.

Table 10: Progress against Regional Spatial Strategy Targets

Progress to March 2011	Growth Area	Rural Area	Total
Target 2001-2021	16,270	1,300	17,570
Completed	1,600	1,250	5,015

Strategic Growth Sites

- 5.10. Most of the housing growth will come from major urban extensions and the new settlement. These strategic sites are now starting to deliver additional housing and the most important are listed below:

Wixams New Settlement

Located to the south of Bedford this straddles the boundary between Bedford Borough and Central Bedfordshire. Within Bedford Borough the capacity within the settlement 'core' is 2,250 dwellings. Both the adopted development brief and the emerging Allocations and Designations Plan recognise the potential to expand the new settlement beyond the 'core' area. By March 2011 Wixams had delivered 358 dwellings of which 175 were affordable. Village 1 is well advanced and all the affordable housing is now complete or in programme. It is strategically important that Village 2 is opened up which will involve a substantial infrastructure commitment by the developer. The current programme would indicate the first housing start in village 2 in 2012/13.

Fields Road, Wootton

Located to the north and south of Fields Road, Wootton, these sites have significant infrastructure requirements to support the housing development even though they are no longer linked to the upgrade of the A421 link to the M1. It is part owned by the council and part by a developer. The two sites together will provide 1080 dwellings. A Resolution to Grant Planning Permission exists for the whole development and a further resolution to grant Planning Permission has been passed in relation to the northern site with a view to a start in 2011/12

Land at Great Denham and West of Kempston

Located to the west of the urban area, at March 2011 these urban extensions with a capacity 2750 homes, had delivered 285 homes including 134 affordable homes. Good progress is being made in delivering both market and affordable housing. Sustaining this investment, through 2011-14 is a priority.

Land North of Bromham Road Biddenham

This key strategic site is linked to the completion of the western by-pass. The scheme will deliver 1200 new homes. The Council is working with developers to deliver the scheme and has also resolved to initiate the process for a Compulsory Purchase Order to ensure that the bypass is completed.

Norse Road 2

At March 2011 this had delivered 237 of the planned 249 units including all 75 affordable homes.

Norse Road 3

This site is owned by a Registered Provider and will provide up to 323 homes in a mixed tenure development. Phase I is funded through a successful Kickstart 2 bid (Kickstart was a Central Government scheme developed to promote development during the economic downturn). The Kickstart scheme comprises 88 units in total, a mixture of private dwellings, social rent, shared ownership and Home Buy Direct (a scheme by which purchasers bought a 75% share of the value of the property – now replaced by a similar scheme called First Buy).

Land North of Brickhill

This site has delivered 413 out of a total of 500 homes including 159 affordable homes. Most of the remaining homes, all for open market sale, will complete in 2012/13

Land at Shortstown

There are two major sites at Shortstown. A start has been made on the northern site which could ultimately provide 970 homes. At March 2011 49 homes had been delivered, all of them affordable homes. In addition the southern site adjacent to the A600 will provide up to 130 homes.

The site east of the Cardington Sheds is linked to the refurbishment of one of the airship sheds. That site will provide up to 425 homes.

When combined, all of these sites have a capacity of up to 1525 homes.

Urban Regeneration

- 5.11 The regeneration of the town centre including the bus station site and the Station Quarter remains a high priority for the council.
- 5.12 The redevelopment of Riverside North is being actively promoted with the council having reached agreement in principle to work with a consortium of Coplan, PRP and Denne. The proposal under consideration includes up to 200 dwellings.

- 5.13 Pre-application discussions have taken place on the Station Quarter site and it is likely to include residential development but redevelopment is likely to follow on from the other town centre key projects.
- 5.14 In 2010, the council adopted a Strategy for Bedford High Street. This includes the possibility of residential uses of the floors above some of the shops on the High Street. Investment will be required to bring this use forward.
- 5.15 In addition there are a number of urban regeneration sites e.g. the Britannia Works site, the Dallas Road site, the former Hallmark Cards site at Eastcotts Road and the former Camfords site on Ampthill Road which have the capacity to deliver new housing.

Rural Housing

- 5.16 Whilst the Rural Policy Area has limited growth requirements compared to Bedford, Kempston and the Northern Marston Vale, existing planning policies make provision for affordable housing in the rural area where it can be demonstrated that there is an identified local need. The council will continue to work with local communities that wish to develop affordable housing.
- 5.17 A number of parishes have conducted housing needs studies in recent years supported by Registered Providers including Jephson Housing Association, Hastoe Housing Association and, until it wound up its development arm, the Rural Housing Trust. These studies have been carried out by the parishes in many cases in conjunction with the Bedfordshire Rural Communities Charity. The council will continue to work to support parishes that have identified a need for affordable housing.
- 5.18 In conjunction with Bedfordshire Rural Communities Charity the Council has developed a standard format for rural needs surveys. The format is designed as far as possible to ensure that genuine local housing need is identified and that when these local applicants come forward for the housing that is provided they will qualify.
- 5.19 An important issue for all parishes contemplating promoting an affordable housing is site selection. While the availability of a site is essential the site selection should not be driven primarily by developers and land owners but should take into account the sequential tests set out in planning policy. It is also important for Parish Councils to consider the impact of the proposed affordable housing on neighbours and to be satisfied that it is an acceptable impact.
- 5.20 A further challenge facing the delivery of affordable housing in the rural area is the size of scheme required for a housing association to consider it viable. Five or six houses is the absolute minimum and with sites that present more development difficulties and costs the number to achieve viability may be higher. Parishes might consider working together to ensure that a slightly larger and therefore viable, development is justified in terms of local need.

- 5.21 Given the overall scarcity of grant, rural housing will increasingly be funded from Registered Provider's own resources, S106 contributions and possibly the Community Infrastructure Levy. The Localism Act and the National Planning Policy Framework will also open up alternative approaches to planning for local development, including housing, in the rural areas. Neighbourhood Plans may provide an opportunity to identify sites for affordable housing.
- 5.22 The National Planning Policy Framework states that local planning authorities should consider whether allowing some market housing would facilitate the provision of significant additional affordable housing to meet local needs in the rural area. There will be many issues to consider in any such schemes but the Council will be concerned to ensure that any such cross-subsidy is supporting the viability of the schemes and not feeding through into land values inflated over rural exception site values.
- 5.23 Parish Councils are understandably concerned to ensure that local housing needs are met by rural exception site schemes. The Council already uses Planning Agreements (S106 agreements) to ensure that local people have preference – first those people in housing need from the parish itself and then those people in housing need from neighbouring parishes. Consideration should be given to whether the Council's current approach excludes people who Parishes would wish to see housed through affordable housing schemes. These households may benefit from shared ownership schemes. As a part of reviewing the Council's approach to allocations consideration will be given to whether greater flexibility in assessing housing needs for rural exception sites might be introduced.

Key Issues facing the Borough

- 5.24 Key issues in relation to this theme are:-
- Rates of housing completions have historically been less than required to meet housing targets up to 2021 and indicate that sustained work and the right policy mix will be required to bring sites forward.
 - It is important to maintain the good progress that is being made on the strategic housing sites.
 - Market conditions and the reduced availability of grant funding may put pressure on the council to re-negotiate the level of affordable housing secured through S106 agreements.
 - A holistic strategic approach to development is important both to meet the council's housing objectives and to deliver important infrastructure and employment requirements.
 - Development in the rural area should continue to reflect the needs of rural communities.

Key Actions

1. We will:
 1. **Aim to deliver 200+ affordable homes per year (noting the comment at paragraph 2.26 point 3)**
 2. **Aim for a minimum of one third and a maximum of two thirds of the 200+ homes to be provided as Affordable Rent homes**
 3. **Continue to work with the development industry and Registered Providers to bring forward the identified development sites in a sustainable form and including the provision of affordable housing**
 4. **Work to maximise investment from Registered Providers and from the Homes and Communities Agency**
 5. **Work with Registered Providers and Parish Councils to deliver housing in the rural area to meet local needs**

Key Partners

5.25. These are:-

- Planning Services
- Developers
- The Homes and Communities Agency
- Registered Providers

Resource

5.26 Staff time is a key resource primarily from Housing Strategy but also from Planning.

The Housing Strategy revenue budget (which is relevant to all four themes in the strategy) for 2012/13 is £104,670.

The Capital Programme for Affordable Housing was greatly reduced at unitary reorganisation. The annual budget is now £100,000 but £304,000 will be available in 2012/13. This level of funding is helpful to support smaller schemes such as rural housing schemes which it might be otherwise difficult to progress. Approximately half of this budget has already been committed.

Drawing in resources from Registered Providers, the Homes and Communities Agency and developers through S106 agreements is critical.

6. Theme 3 - Making Best Use of the Existing Housing Stock

Key Objectives

- Work with partners to improve the fabric of the existing stock in particular to improve energy efficiency, reducing the carbon footprint of the existing stock, increasing adaptability to climate change and reducing fuel poverty.
- Target long term empty homes and bring these back into beneficial use.

Data Sources

6.1 The following data sources are important when considering how to make best use of the existing housing stock.

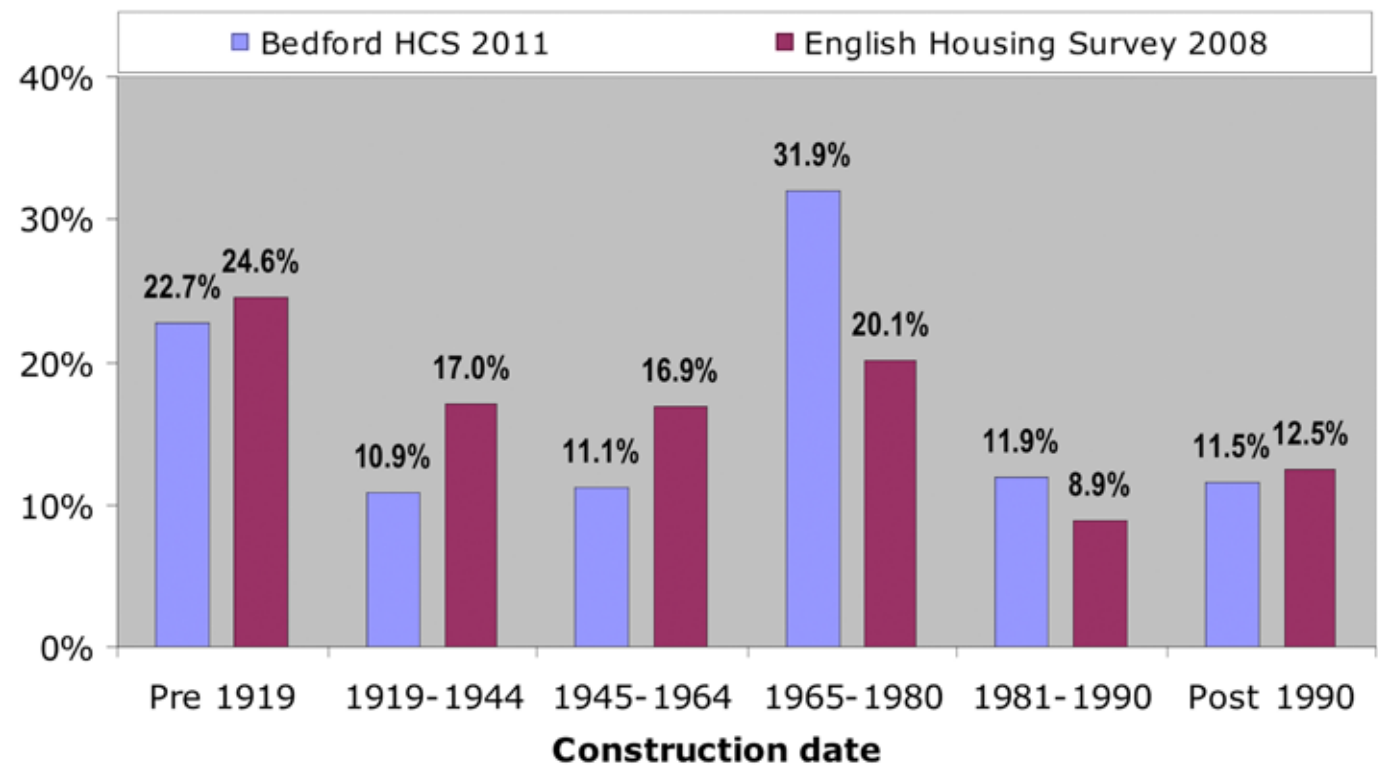
- Private Sector House Condition Survey
- Empty Homes Database
- Empty Homes Strategy
- Number of unlicensed houses in multiple occupancy
- English Housing Survey (EHS)

Private Sector House Condition Survey

6.2 The council has commissioned a Private Sector House Condition Survey which was completed in 2011. It provides a large amount of detail about the housing conditions in the private sector. At the time of the survey there were estimated to be a total of 63,380 dwellings in the borough, of which 52,220 fall within the private sector.

6.3 Figure 11 below compares the dwelling age profile of Bedford Borough with the profile within England. This shows that 44.7% of dwellings were built before 1965 which is lower than the national average, whereas 43.8% were built between 1965 and 1990. This is substantially higher than the national average of 29%. The post 1990 figure is 11.5%.

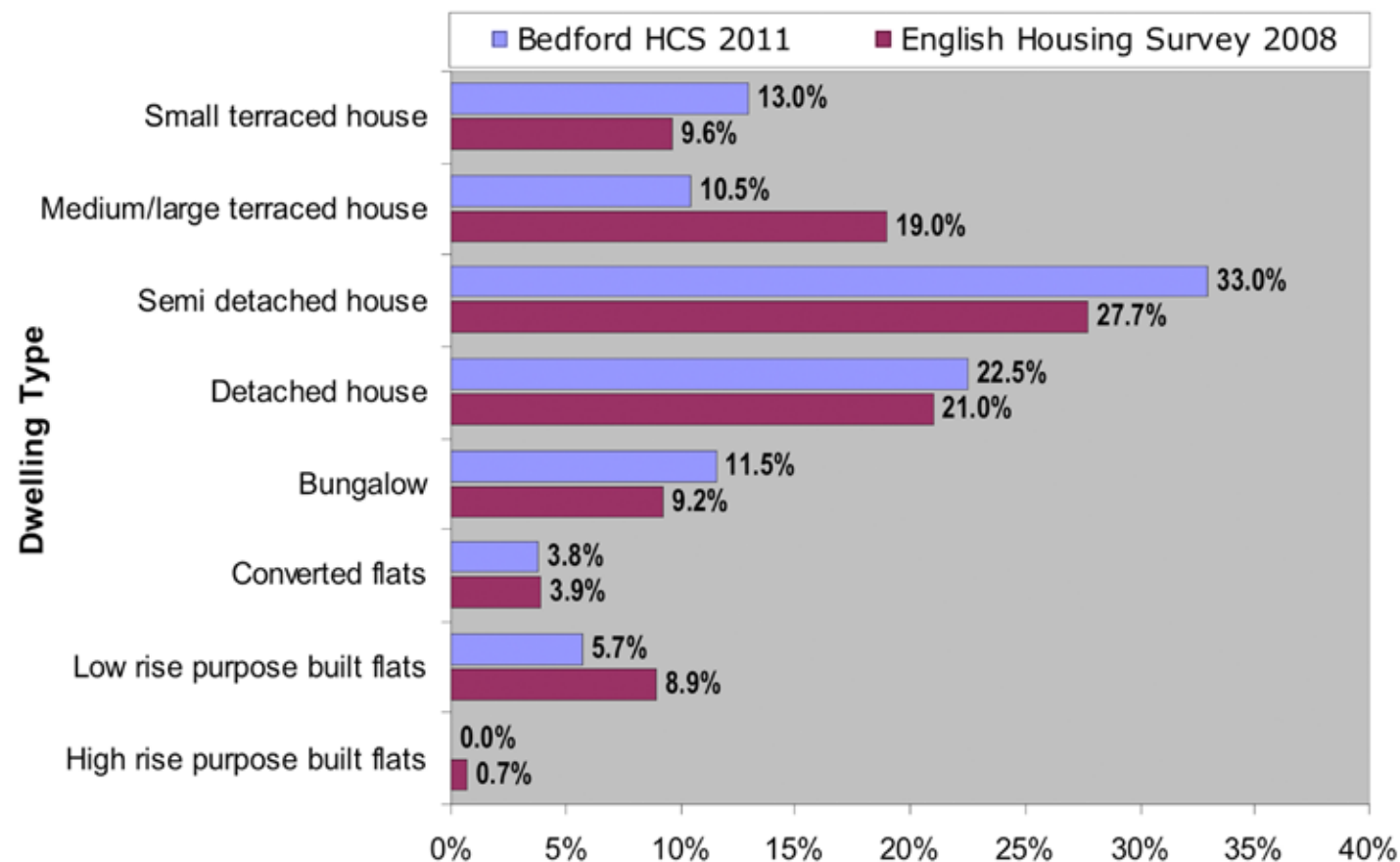
Figure 11: Dwelling age profile Bedford Borough and England



Source: 2011 BBC House Condition Survey & EHS 2008

- 6.4 Figure 12 shows the dwelling type profile of Bedford compared to England. Small terraced houses are defined as being less than 70m² and medium/large terraced houses as 70m² or more. Semi-detached houses and detached houses are the predominant dwelling type in Bedford.

Figure 12: Dwelling type profile Bedford and England



Source: 2011 BBC House Condition Survey & EHS 2008

- 6.5 Table 11 below shows the breakdown within the borough by tenure. This shows that owner occupied properties represent 65% of the total dwelling stock.

Table 11: Tenure Proportions in Bedford Borough

Tenure	Dwellings	%	EHS 2008
Owner occupied	43,700	65%	68%
Privately Rented	12,160	18%	14%
Private Sector Stock	55,860	83%	82%
Registered Provider	10,990	16%	9%
Local Authority & Other Public	460	1%	9%
Social Housing	11,450	17%	18%
All Tenures	67,310	100%	100%

Source: Source: House Condition Survey 2011 & EHS 2008

The Decent Homes Standard

- 6.6 The Decent Homes Standard is a government policy that states that everyone should have the opportunity of living in a decent home. To meet the standard there are four broad criteria that a property should:

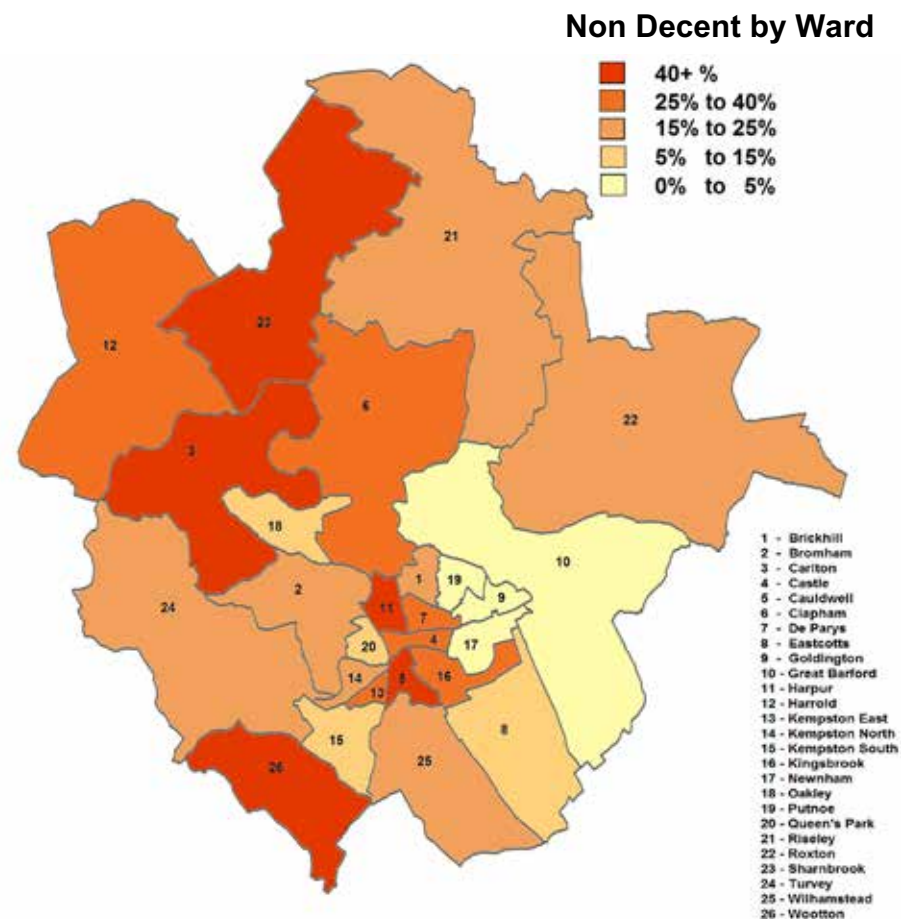
- A – be above the legal minimum standard for housing, and
- B – be in a reasonable state of repair, and
- C – have reasonably modern facilities (such as kitchens and bathrooms) and services, and
- D – provide a reasonable degree of thermal comfort (effective insulation and heating)

If a dwelling fails to meet any one of the criteria then it is considered to be ‘non-decent’.

- 6.7 Under the 2004 Housing Act the Housing Health and Safety Rating System (HHSRS) replaced the former fitness standard and is a prescribed method of assessing individual hazards and deals with a broader range of issues. It covers 29 hazards in four main groups – the minimum standard for housing, reasonable state of repair, modern facilities, and thermal comfort and was used to assess the dwellings surveyed in the House Condition Survey 2011. Category 1 hazards are the most severe meaning that urgent remedying is required. Category 1 hazards include excess cold, falls on the level and on stairs, entry by intruders, flames and hot surfaces, damp and mould growth and fire.

- 6.8 The House Condition Survey estimated that nearly a quarter of private sector dwellings (13,450 dwellings or 24.2%) failed the Decent Homes Standard in Bedford Borough. 13.1% of all private sector dwellings failed due to thermal comfort failure and 13.0% due to the presence of Category 1 hazards. Excess cold was the most frequent Category 1 hazard (59.6%) followed by risk of falls (41.6% - the figures do not sum to 100% as a dwelling may have more than one hazard). What is clear is that poor thermal comfort and excess cold are key issues. One in ten private sector households in Bedford are in fuel poverty (House Condition Survey 2011).
- 6.9 Nearly one third of vulnerable households are in non-decent homes (31%).
- 6.10 The following Figure 13 shows the proportions of non-decent dwellings by ward. The highest rates of non decent dwellings were found in the Carlton, Cauldwell, Harpur, Sharnbrook and Wootton wards. It should be noted that Figure 13 shows the ward boundaries that were in place at the time the House Condition Survey was carried out. Some of the ward boundaries have subsequently changed.

Figure 13: Non decent dwellings by ward



6.11 The non decent stock compares favourably to England as a whole where over a third (34.4%) of dwellings are non-decent. Nevertheless the investment required to bring the private sector stock up to the Decent Homes standard is substantial. The following Table 12 shows the estimated costs of bringing the properties to a good standard.

Table 12: Estimated costs of bringing properties to Decent Homes standard

Reason	Total Cost (£million)	Average cost per non-decent dwelling (£)*
Category 1 Hazard	£30.2	£4,160
Repair	£7.8	£3,440
Amenities	£11.9	£17,360
Thermal Comfort	£10.4	£1,420
Total	£60.3	£4,450

Source 2011 BBC House Condition Survey

6.12 Category 1 hazards were found to be strongly associated with older dwellings and dwellings occupied by households on an income less than £10,000, those in receipt of benefit, those aged over 65 and dwellings with a disabled resident. Flats and bungalows are disproportionately likely to have Category 1 hazards.

6.13 The House Condition Survey 2011 looked at Bedford in four sub-areas (Bedford Inner, Bedford North Outer, Kempston and Bedford South and Bedford Rural), these are shown in Figure 14. Table 13 shows the category 1 hazards by sub area and tenure for vulnerable households. With the exception of Bedford Rural the privately rented sector had the worst disrepair.

Figure 14: Bedford House Condition Survey Sub-areas



Source: Bedford HCS, 2011

Note: since the survey was carried out, some of the ward boundaries have changed.

Table 13: Category 1 Hazards by sub-area and tenure (No. of vulnerable households)

Tenure Name	Bedford Inner	Bedford North Outer	Kempston and Bedford South	Bedford Rural	Bedford
Owner occupied	8.6%	6.2%	9.9%	17.7%	11.3%
	560	800	930	2,630	4,920
Privately rented	16.5%	14.5%	12.5%	51.1%	19.3%
	560	340	570	850	2,350

Source 2011 BBC House Condition Survey

House Renovation Grants

- 6.14 The council currently offers Renovation Grants and Loans, subject to means testing, to owner-occupiers whose homes are in need of improvement to eliminate risks and meet basic standards. In the case of work to improve the thermal efficiency of the house, grant will be targeted at those properties with the poorest thermal insulation and households spending large amounts on heating bills. Major Works Grants will only be offered to vulnerable households who are at imminent risk from defects in their properties in accordance with the Housing Health and Safety Rating System (HHSRS) Category One hazards and to meet the Decent Homes Standard. Table 14 shows the total number of Renovation grants and loans that the council has completed. The Private Sector Renewal Assistance Policy is under review with a view to the emphasis being on the offering of loans rather than grants.

Table 14: Total Completed Renovation Grants/Loans

	2006/07	2007/08	2008/09	2009/10	2010/11
Completed Housing Renovation Grants/Loans	98	72	154	75	64

Source: Bedford Borough Council

- 6.15 The Council successfully secured funding for the Bedfordshire and Luton Energy Scheme. This resulted in 1388 insulation measures being installed through grants and 118 boiler replacements through loans to older people in the Bedford Borough Council area. Further funding has been offered by the Department of Health for loans to replace old and poorly functioning boilers. The project has demonstrated that a programme to address poor energy efficiency can be mounted through loans. This learning will assist the Council in considering its response to the Green Deal.

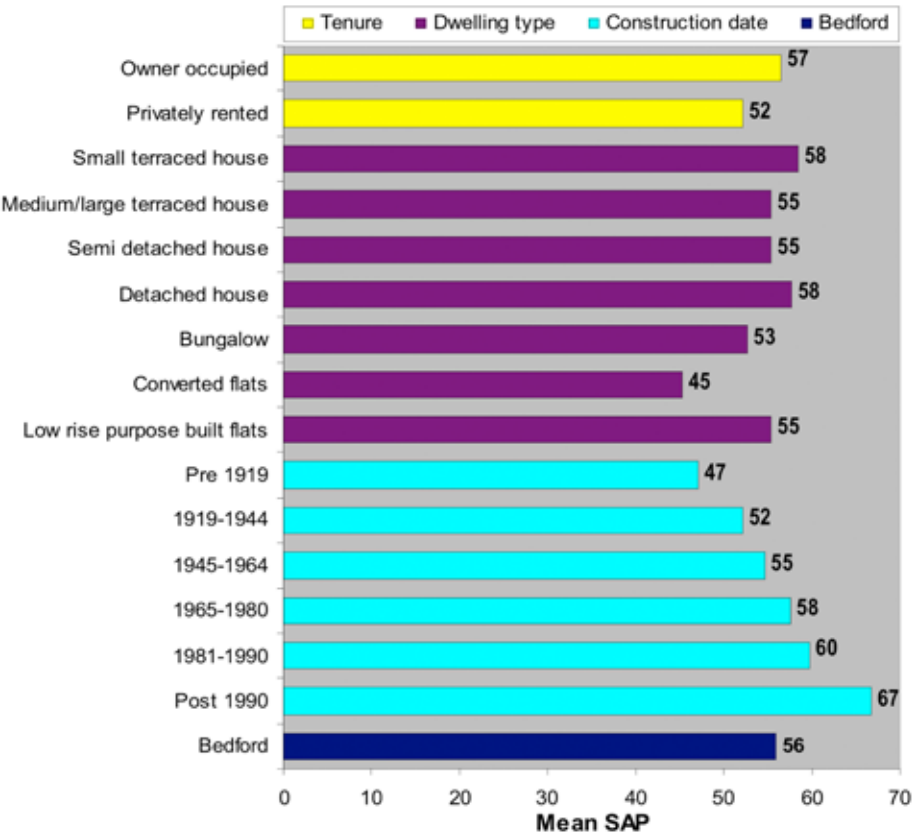
Enforcement Action

6.16 Many of the most serious problems occur in the private rented sector. In these cases the council takes action through Environmental Health enforcement procedures.

Energy Efficiency

6.17 The Standard Assessment Procedure (SAP) is a government rating for energy efficiency. It is based on the annual calculated annual energy cost for space and water heating and is expressed on a 0-100 scale. A higher number reflects a better energy rating. The average SAP rating in Bedford is 56 which is slightly higher than the national figure of 50. Figure 15 shows that increases in SAP ratings are associated with a reduction in dwelling age with the most modern stock having the highest SAP rating. The average SAP rating for owner occupied housing was 57 which compares to a SAP rating of 52 for privately rented housing.

Figure 15: SAP ratings by general characteristics



Source 2011 BBC House Condition Survey

- 6.18 Table 15 considers an estimate that has been made of the number of energy efficiency measures that are required to dwellings within the borough, along with an estimated cost. The total cost of providing all 46,800 energy efficiency measures is estimated at £73 million.

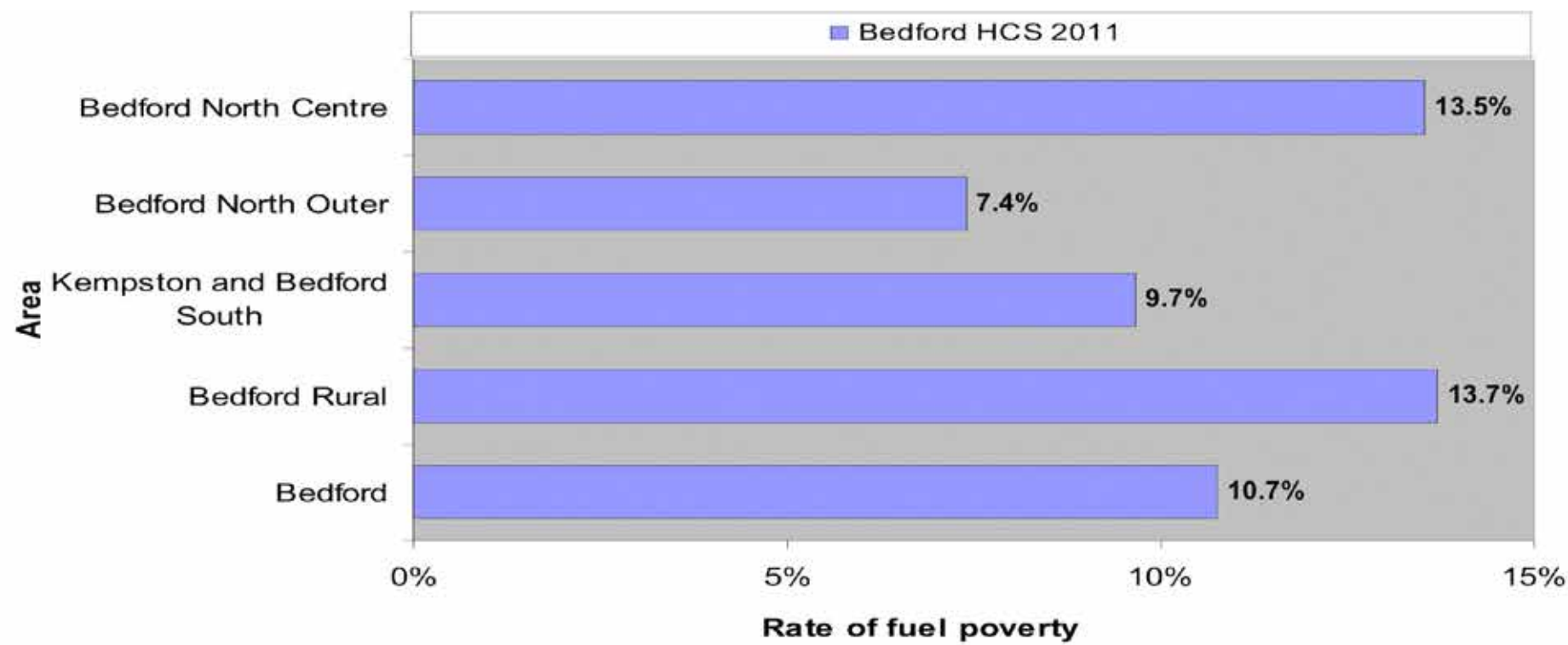
Table 15: All energy efficiency measures that could be completed

Measure	Dwellings	% of stock	Cost (£ million)
Loft insulation	26,000	46.5%	£12.5
Wall insulation	13,600	24.3%	£8.9
Double glazing	4,900	8.8%	£38.6
Cylinder insulation	32,100	57.5%	£1.5
New boiler	7,600	13.6%	£6.9
New central heating	1,600	2.9%	£4.7
Any measures	46,800	83.8%	£73.0

Source 2011 BBC House Condition Survey

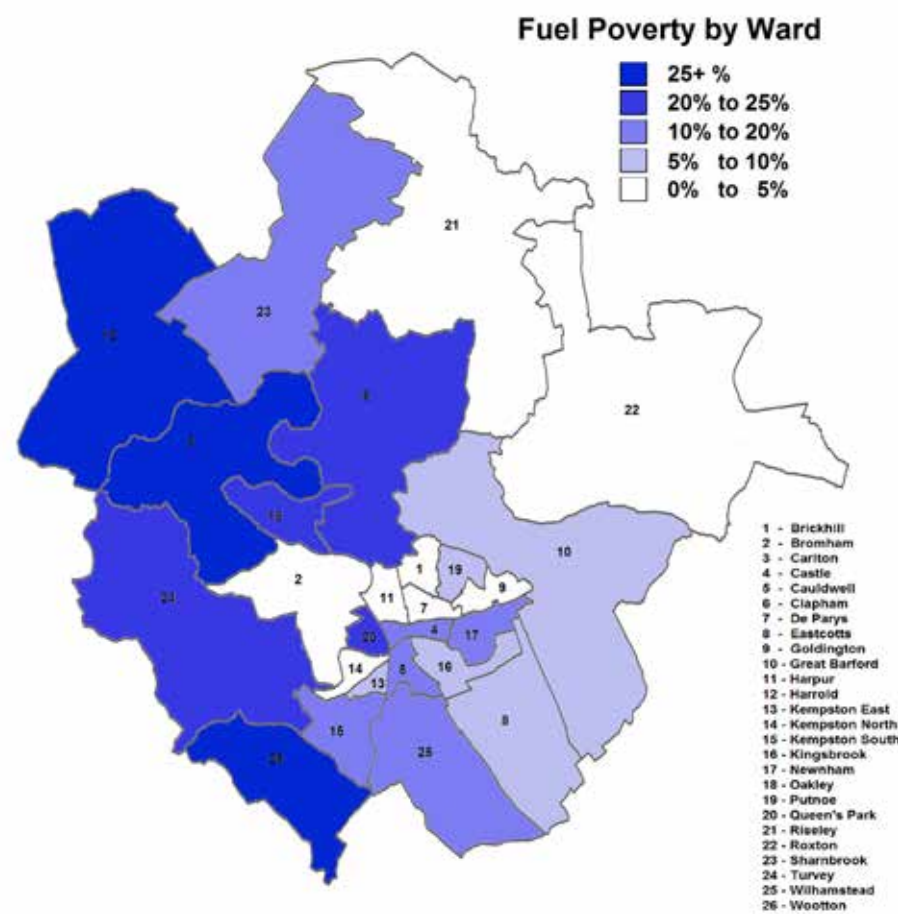
- 6.19 10.7% of households in Bedford Borough suffer from fuel poverty which is lower than the 15.4% England average (Source BBC House Conditions Survey). The survey finding is lower than Department of Climate Change estimate for 2009 which was 14.7%. The DECC average for England was 18.4% (Source = DECC Sub-Regional Fuel Poverty Levels, England 2009). Households are considered to be in fuel poverty if more than 10% of their net household income would need to be spent on heating and hot water to give adequate provision of warmth and hot water. The highest rate of fuel poverty is in the private rented sector where 12.6% of households are fuel poor compared to 10.2% of owner occupied households. With energy costs continuing to increase the number of households in fuel poverty will also increase.
- 6.20 A total of 61% of households in fuel poverty had incomes less than £10,000 per annum. For those fuel poor households in receipt of benefits it is estimated that a total of £2 million would need to be spent on improvements to lift those households out of fuel poverty. Fuel poverty is usually associated with dwellings where one or more residents are in receipt of a means tested benefit. In Bedford Borough 20.9% of households in receipt of benefit are in fuel poverty (House Condition Survey 2011).
- 6.21 Of the sub-areas within the House Condition Survey Bedford Rural has the highest proportion of fuel poor households at 13.7%. Figure 16 shows the rate of fuel poverty by sub area and Figure 17 shows the proportion of households who are fuel poor. The highest rates of fuel poverty were found in Carlton, Harrold and Wootton wards.

Figure 16: Fuel poverty by sub-area



Source 2011 BBC House Condition Survey

Figure 17: Fuel Poverty by ward



Note: since the survey was carried out, some of the ward boundaries have changed.

6.22 As the lead authority for the Bedfordshire and Luton Energy Efficiency Scheme (BALES) the council has been running a cavity wall and loft insulation grant scheme and a boiler replacement loan scheme. These schemes have helped to increase the energy efficiency of dwellings in the Borough and reduce the levels of fuel poverty. The insulation scheme has offered households cavity wall and loft insulation at a reduced rate. The boiler replacement scheme was offered as a loan to replace inefficient or broken boilers. Both schemes have been focussed on older residents and other vulnerable groups.

Adaptations

6.23 Disabled Facilities Grants are a mandatory service provided by the council. Table 16 shows the total number of grants that have been completed since 2006/07.

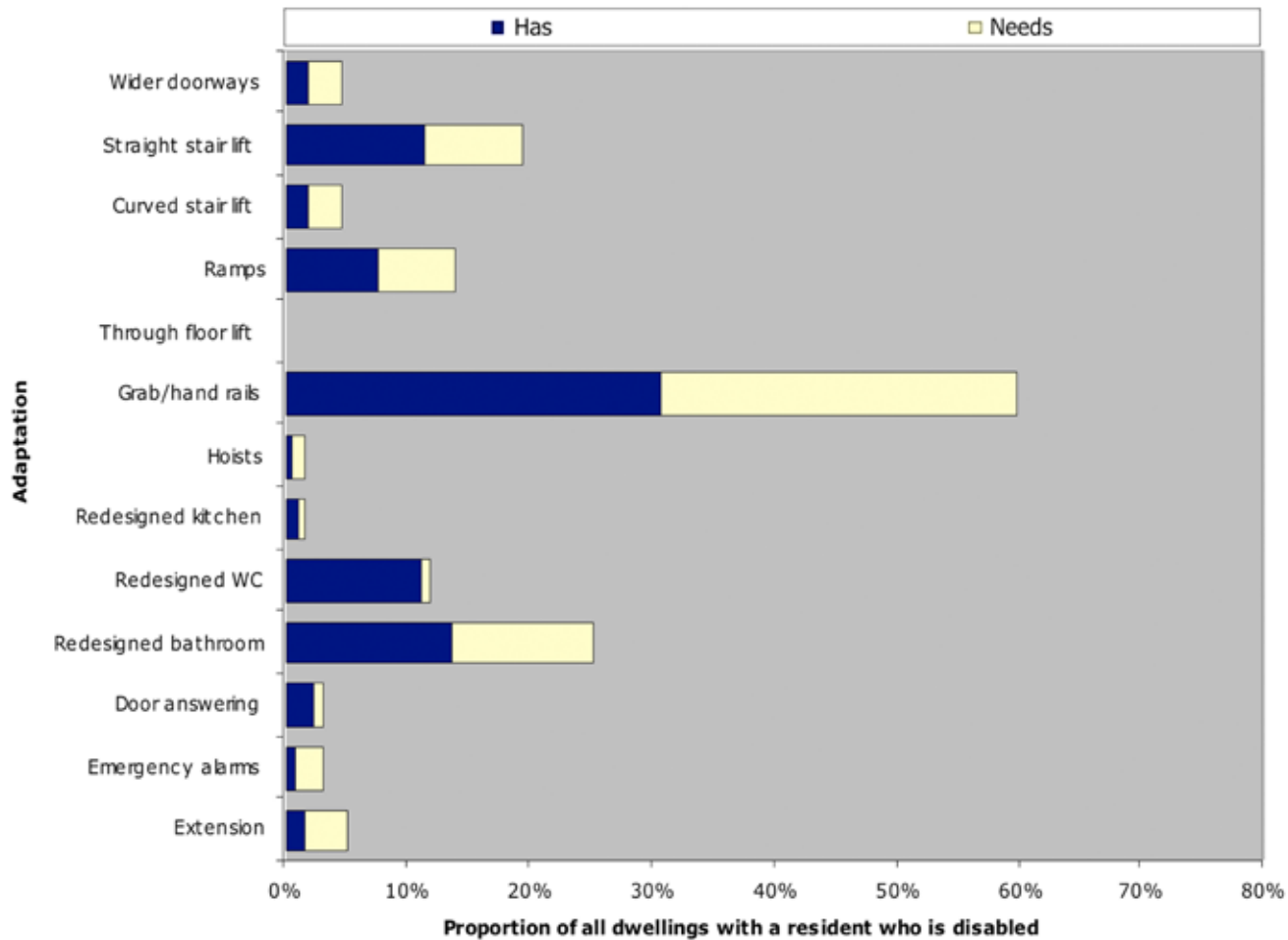
Table 16: Total Disabled Facilities Grants Completed

	2006/07	2007/08	2008/09	2009/10	2010/11
Completed DFG claims	209	184	212	269	149

Source: Home Improvement Team Data

6.24 Figure 18 shows the disabled equipment that is both present and required. Grab/hand rails are the highest level of current provision and were present in 30.6% of dwellings occupied by a person with a disability. Of the total, 13.7% had a redesigned bathroom. There is clearly a gap between the needs and existing provision.

Figure 18: Disabled adaptations/equipment present (shown in blue) or required (shown in yellow).



Source: 2011 BBC House Condition Survey

- 6.25 Table 17 shows the estimated costs of adaptations required for residents with disabilities. The total cost of all adaptations and equipment that would benefit households with disabilities is just under £16.8 million. The statutory framework for means testing would be required for the adaptations which could reduce this figure to approximately £6 million.
- 6.26 The council's budget for adaptations is under pressure due to the rising demand from an aging population and limited available resources. The council's budget for Disabled Facilities Grants (DFGs) is £1,158,304 for 2011/12. At October 2011 there was a waiting list for DFGs of 399 people. The council gives priority to critical cases to ensure best use of the available funding. Supporting people to stay at home often accords with their wishes and saves the much greater costs of residential care or extended hospital stays.
- 6.27 The council works closely with Registered Providers and in almost all cases successfully operates a match-funding arrangement for the larger scale adaptations required by tenants in Affordable Housing.

Table 17: Estimated Costs of adaptations required for households with disabilities

Adaptations and equipment	Adaptations and equipment*	Adaptation and equipment cost	Cost after means testing
Wider doors	170	£208,000	£23,000
Straight stair lift	520	£1,572,000	£462,000
Curved stair lift	180	£1,815,000	£618,000
Ramps	400	£1,007,000	£471,000
Grab/hand rails	1,920	£961,000	£34,000
Hoists	70	£144,000	£72,000
Redesigned kitchen	40	£226,000	£66,000
Redesigned WC	60	£154,000	£38,000
Redesigned bath	750	£3,742,000	£2,435,000
Door answer	50	£143,000	£72,000
Emergency alarms	160	£161,000	£81,000
Extension	220	£6,643,000	£1,615,000
Total	4,540	£16,776,000	£5,987,000

*Figures are for numbers of adaptations/equipment, some dwellings may need multiple provision.

Source 2011 BBC House Condition Survey

Overcrowding

- 6.28 Statutory overcrowding standards were set in 1935 and restated in the Housing Act 1985. The highest level of overcrowding in the private sector was found in the central area of Bedford where 2.5% of dwellings were overcrowded. The lowest level was in the rural area where less than one in a hundred dwellings were over-crowded (0.7%)
- 6.29 On the higher standards set by the Survey of English Housing the pattern is the same but the level of over-crowding in central Bedford is assessed as significantly higher – at 6.7%. The other areas are between 1.5% and 2.0%.
- 6.30 Environmental Health and the council's homelessness team work together to co-ordinate the council's approach to statutory overcrowding.

Houses in Multiple Occupation

- 6.31 Houses in Multiple Occupation (HMOs) form only a small proportion of the private sector stock in Bedford Borough. The Housing Act 2004 created mandatory licensing for some Houses in Multiple Occupation (3 or more storeys occupied by five or more people comprising of two or more households). Some converted flats now come within the HMO definition (Section 257 Housing Act 2004) which explicitly includes converted flats where the work does not meet specified standards (generally the Building Regulations 1991) and where less than two thirds are owner occupied. The House Condition Survey estimated that there are 70 potentially licensable HMOs which corresponded with the number of licensed HMOs on the council's records at June 2011. The House Condition Survey estimated a total of 1460 HMOs of all types. The council maintains a database of three storey HMOs which at June 2011 had 650 HMOs listed on it.

Additional HMO Licensing

The feasibility of introducing an additional HMO licensing scheme within the Borough will be investigated as part of measures designed to improve the standards of the private rented sector housing stock and the HMOs that represent a large proportion of the rental market within Bedford. Currently Bedford Borough Council operates a mandatory HMO licensing scheme for certain classes of HMO that present a higher risk to the safety of private sector tenants, this is in line with national legislation and guidance. Standards within these properties have improved since the introduction of mandatory licensing in 2006 and improvements in safety have been secured through the licensing and enforcement procedures adopted by the Environmental Health & Trading Standards Service.

Empty Homes

- 6.32 The council considers taking action when a dwelling has been empty for six months or longer. Homes which remain empty for long periods of time are a wasted resource and can also act as a focus for squatters and anti-social behaviour. The council has a key role in encouraging owners to bring their property back into beneficial use. In so doing, the council's overriding objective is to increase the amount of decent housing available to those in need, to reduce homelessness and to reduce the cost to the council of providing temporary accommodation.

- 6.33 Wherever possible the council works with owners of long term empty properties by offering advice and assistance. This could include the offer of loans to bring the property back into use. The Tenancy Deposit Guarantee Scheme has also been of assistance through putting forward tenants to occupy empty homes and bring them back into use. Where owners of long term empty homes are unwilling or unable to bring them back into use, the council maintains the option of acquiring the property by means of a compulsory purchase procedure.

Key Issues facing the Borough

- 6.34 Key issues in relation to this theme are: -

- Carbon emissions, adaptability to climate change, and fuel poverty are key issues particularly in the older stock including stock in the rural area
- Public sector resources will be very limited and partnerships with the private sector drawing in private investment will be important to achieving improvements
- There is a continuing need for enforcement action and loan support to address the worst properties in the private rented sector
- The Council's limited resources for grants and loans for properties in disrepair or requiring improvement are focussed on Category One Hazards under the Housing Health and Safety Rating System. Although the Stock Condition Survey highlights geographical areas of concern it is not currently possible to focus this on particular geographical areas
- It will continue to be important to address the gap between needs and provision for aids and adaptations and prioritising the most critical cases when funds are limited

Key Actions

We will:

1. **Provide measures to increase energy efficiency and adaptability to climate change and reduce fuel poverty. Work with partners to maximise benefits to Bedford Borough of emerging energy efficiency programmes and existing programmes**
2. **Consider the role that the Council might take in the implementation of the Green Deal**
3. **Provide (subject to budget limitations) grant assistance to enable adaption of existing properties**
4. **Bring empty properties back into use. Continue to complete Compulsory Purchase Orders where appropriate (subject to budget limitations). Work with Registered Provider partners to bring empty homes back into use**
5. **Develop an Empty Homes Plan**
6. **Review the Private Sector Housing Strategy**
7. **Review policy on licensing of Houses in Multiple Occupation (HMO) that are licensed**

Key Partners

- 6.35 The following partners will be crucial to delivering the targets and objectives for this strategic theme;
- Joined up approach between Housing Strategy, Adult Services and the Home Improvement Team in particular
 - Environmental Health
 - Sustainable Communities Team – Sustainability Team
 - Registered Providers

Resources

- 6.36 Staff time is a key resource particularly from Operational Housing and Housing Strategy
- The Operational Housing revenue budget for 2012/13 for private sector housing is £153,290. This excludes revenue transfers to the capital programme of £718,000.
 - The Capital Programme (including transfers from revenue) for 2012/13 is £1,366,000 for Disabled Facilities Grants and £100,000 for Discretionary Private Sector Renewal Grants
 - The Housing Strategy revenue budget (which is relevant to all four themes in the strategy) for 2012/13 is £104,670
 - The annual Capital Programme for Bringing Empty Homes back into use is £130,000 which is sufficient to compulsorily purchase one property per year.
 - The Council has been successful in securing resources from central government for energy related home improvement programmes. This funding is greatly reduced but the Council continues to seek ways to bring additional resources into the Borough with a particular focus on energy efficiency.

7. Theme 4 - Homelessness and Meeting the Needs of Vulnerable People

Key Objectives

- Prevent homelessness through the provision of housing advice and through identifying housing options for persons at risk of homelessness.
- Plan for the implications of an aging population including supporting people in their existing homes and providing specialist accommodation.
- Support the adaptation of existing homes and the provision of new homes that are accessible to people with different abilities.

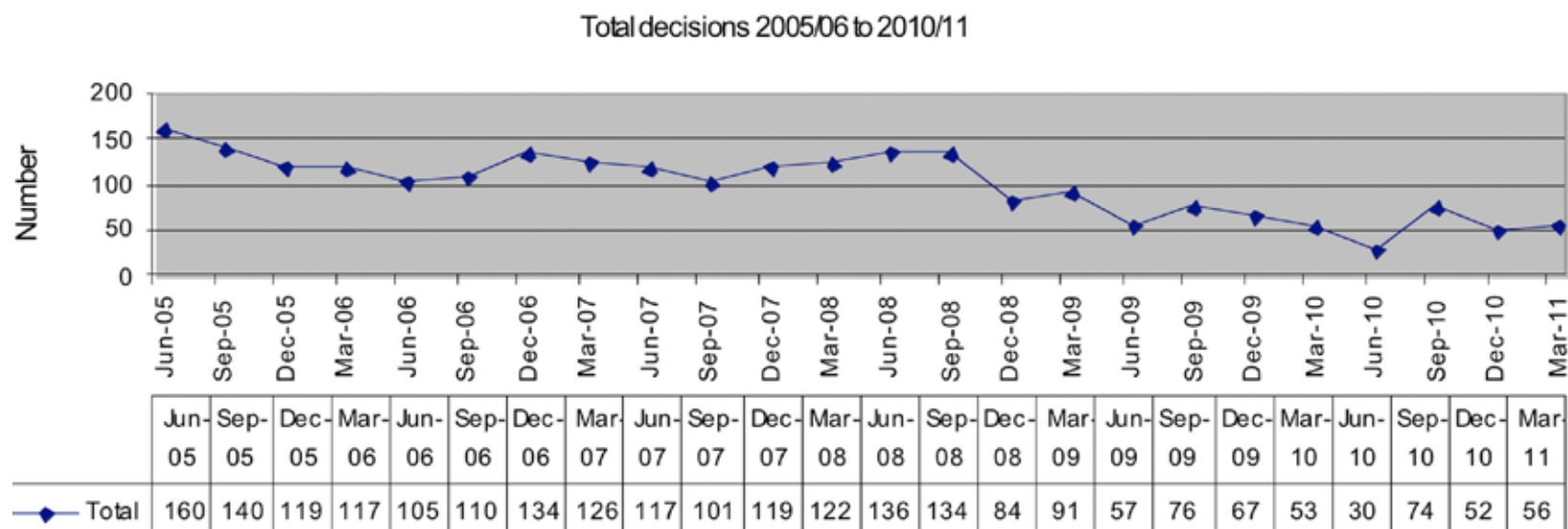
Data Sources

- 7.1 The following data sources are important when considering homelessness and how to meet the needs of vulnerable people.
- Gypsy and Traveller Accommodation Assessment
 - Older Persons Accommodation Strategy
 - Supporting People Strategy
 - Supporting People Gateway information
 - Housing Needs Performance data
 - Bedford Borough Joint Strategic Needs Assessment
 - Housing Benefit data
 - Annual count of rough sleepers
 - Housing Strategy Statistical Appendix
 - Government returns on Statutory Homelessness
 - Gypsy and Traveller Health Needs Assessment 2004/5 plus updates in 2008 and 2010
 - Various Health Needs Assessments covering learning disabilities, the homeless, prison, migrant workers, veterans, and offenders in the community
- 7.2 The Housing Strategy has been developed in advance of the refresh of the Joint Strategic Needs Assessment which is currently in progress. It is hoped and expected that this refresh will significantly improve the quality of data available across the whole range of vulnerable groups.
- 7.3 This Strategy sets out the needs as currently evidenced and priorities which the Council has already set. An action following from this strategy will be the development of a Vulnerable Groups Accommodation Strategy to consider these needs in greater detail and in the light of the refreshed Joint Strategic Needs Assessment.

- 7.4 A new Supporting People Strategy is also in preparation to follow on from the current 2008-13 Supporting People Strategy.
- 7.5 Within this theme a wide range of vulnerable groups are reviewed in no particular order. It is accepted that the needs of the different groups vary greatly but the common thread is that special provision is often required and even when it is not there are particular access, management and support issues to be addressed.

Homelessness

- 7.6 The council has a legal duty to formulate a Homelessness Strategy for preventing and tackling homelessness. Legal duties to homeless people arise if the council has reason to believe that a person is homeless or threatened with homelessness. In cases where applicants are homeless and have a 'priority need' the Council must provide accommodation or take reasonable steps to prevent the loss of accommodation. Priority need groups include households with children; children formerly in care, young people under 18 and people who are vulnerable as a result of old age, mental illness, physical disability or leaving institutions.
- 7.7 A significant element in the council's housing policy since the last strategy was developed in 2003 has been to avoid the long-term use of bed and breakfast accommodation. Bedford Borough Council had not used bed and breakfast between November 2003 and October 2011 however due to recent demand it has been necessary to use it for emergency placements. It is acknowledged that as emergency accommodation and in certain situations e.g. hospital discharge, or fleeing domestic violence, short term use can be beneficial.
- 7.8 At the 31st March 2011 there were 3,093 households on the Housing Register. Since September 2008 applicants have averaged 410 per quarter. The applicants are all of varying housing need and are given priority as appropriate.
- 7.9 In 2010/11 a new casework system was introduced which provided more robust data indicating that there were 3507 visitors to the Housing Options service of which 1195 were new clients. The half year data for 2011/12 at 30th September 2011 showed that there had been 2264 visitors and 718 new clients.
- 7.10 In 2010/11 there were 212 homelessness decisions. The number of homelessness decisions has significantly reduced over the period June 2005 – March 2011 from 160 in the quarter to June 2005 to 56 in the quarter to March 2011. However there has been an increase in the number of homelessness preventions from 252 in 2009/10 to 470 in 2010/11. Increasing homelessness preventions means that fewer homelessness decisions have to be made.

Figure 19: Number of Homelessness Decisions 2005-2011

7.11 The graph below (Figure 20) shows homelessness decisions by quarter between June 2005 and September 2010. Outcomes are broken down into the following:

- Duty accepted – a duty to re-house has been accepted by the council
- Intentional – the council does not have a duty to re-house those found to have become homeless intentionally
- No priority need – the council only has a duty to house those in priority need
- Not homeless – on investigation some households were found not to be homeless
- Not eligible – households may not be eligible for assistance for various reasons notably immigration status

7.12 Figure 20 shows that there has been a decline over the last 6 years of more than 50% in the number of households accepted as homeless. As discussed in 7.7 whilst the number of households accepted as homeless and the homelessness decisions taken in total have decreased in 2010/11 compared with previous years this is balanced by the increase in the number of households prevented from being homeless which has increased since 2005 from 119 in 2005/06 to 470 in 2010/11. Figure 21 shows the total number of homelessness preventions. Figure 22 shows both homelessness decisions and homelessness preventions.

Figure 20: Homelessness Decisions - Outcomes 2005-2011

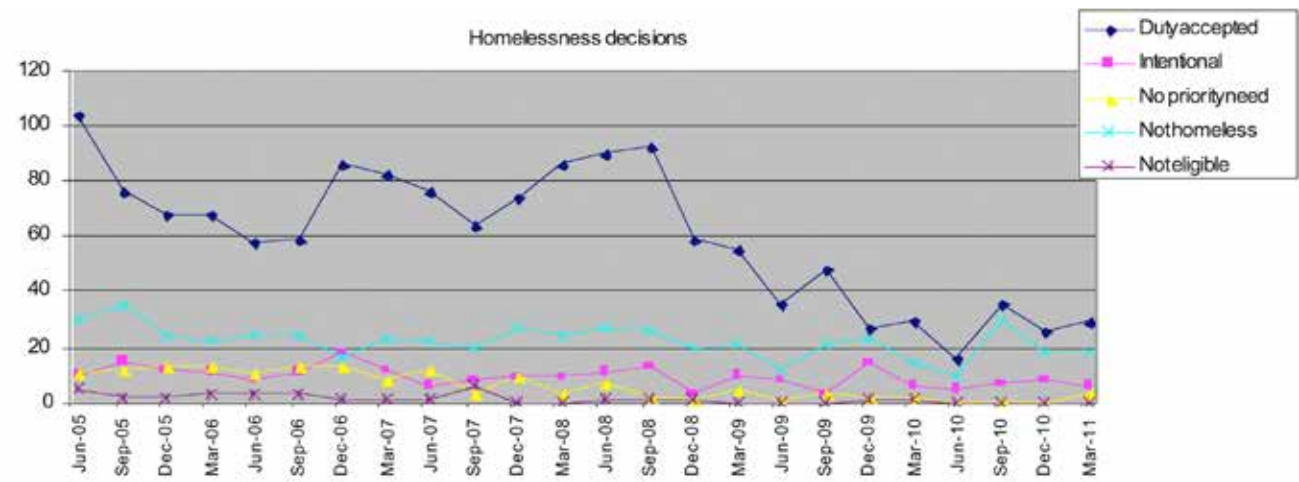


Figure 21: Total number of homelessness preventions

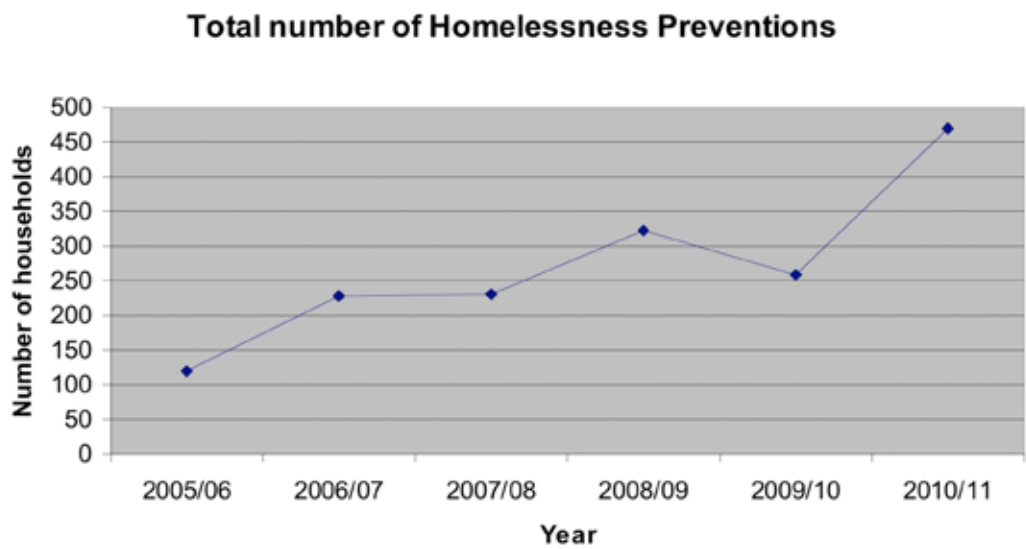
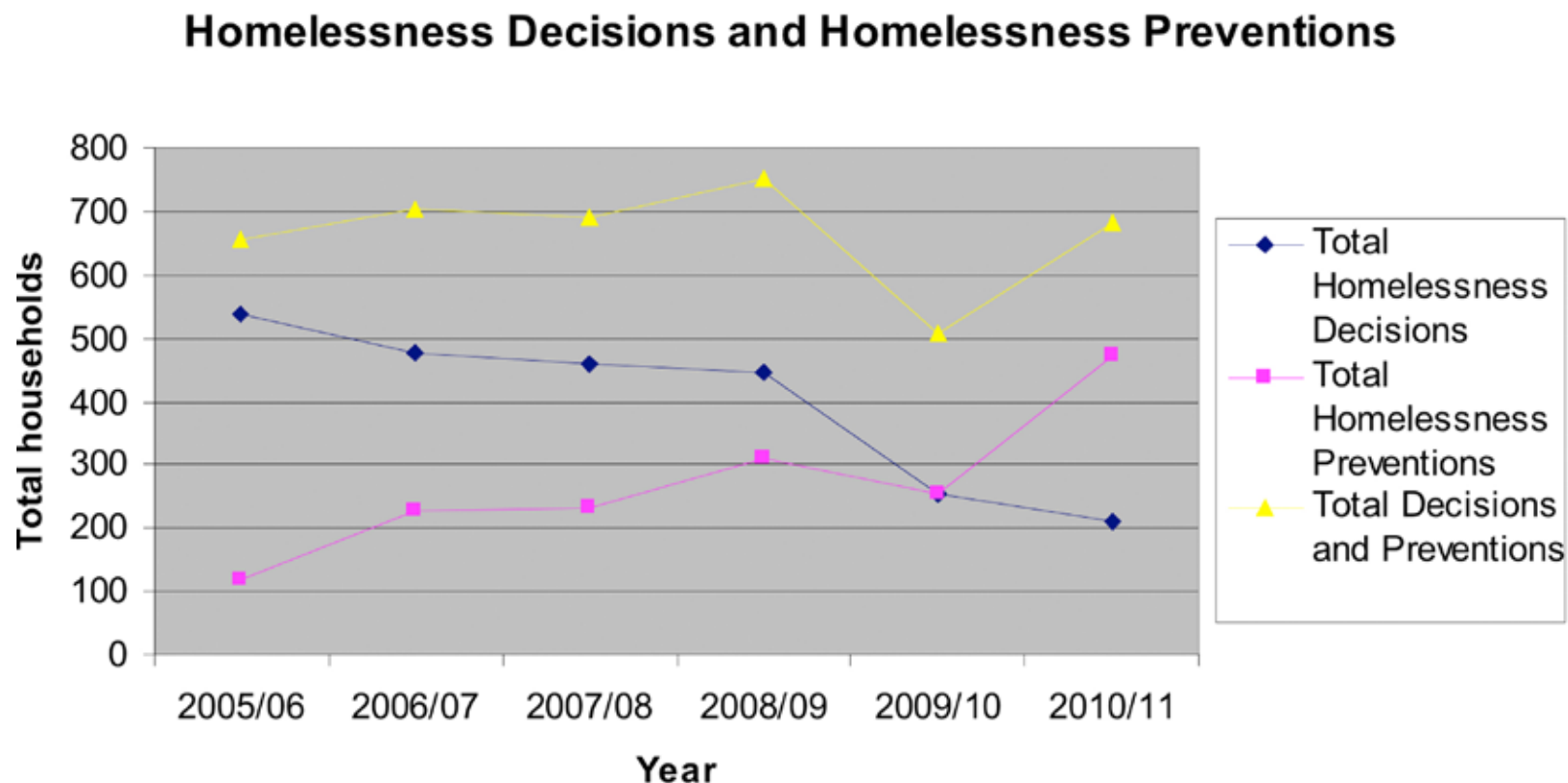


Figure 22: Total number of Homelessness Decisions and Homelessness Preventions

- 7.13 Tables 18 and 19 breakdown the homelessness preventions into those that have been able to remain in their existing home and the reasons for this, and those that have either had their homelessness prevented or relieved to find alternative accommodation. Providing debt advice and helping to resolve rent or service charge arrears in the social or private rented sector have been two of the main factors in helping to prevent homelessness. Table 19 shows that private rented sector accommodation with landlord incentive scheme is the main reason for being able to prevent or relieve homelessness and find alternative accommodation. These tables emphasise the work that is completed which prevents homelessness and reduces the number of homelessness decisions required.

Table 18: Homelessness Prevented - household able to remain in existing home, as result of:

	2008/09	2009/10	2010/11
Meditation using external or internal trained family mediators	0	0	0
Conciliation including home visits for family/friend threatened exclusions	2	2	3
Financial Payments from a homeless prevention fund	6	0	0
Resolving Housing Benefit problems	16	6	14
Resolving rent or service charge arrears in the social or private rented sector	50	54	74
Sanctuary scheme measures for domestic Violence	7	24	2
Crisis intervention - providing emergency support	0	1	0
Negotiation or legal advocacy to ensure that someone can remain in accommodation in the private rented sector	3	10	6
Providing other assistance that will enable someone to remain in accommodation in the private or social rented sector	53	64	37
Mortgage arrears interventions or mortgage rescue	2	2	27
Other (please specify in notes)	3	0	5
Total	142	167	268

Source: P1E Homelessness Data

Table 19 Homelessness prevented or relieved-household assisted to obtain alternative accommodation in the form of:

	2008/09		2009/10		2010/11	
	Homelessness Prevention	Relieved	Homelessness Prevention	Relieved	Homelessness Prevention	Relieved
Any form of hostel or House in Multiple Occupation (HMO) with or without support	4	1	0	2	16	0
Private rented sector accommodation with landlord incentive scheme (eg cashless BOND, finders fee, deposit payment, rent in advance, landlord insurance payment, RDS)	112	27	54	15	87	3
Private rented sector accommodation without landlord incentive scheme	1	0	0	0	7	0
Accommodation arranged with friends or relatives	0	0	0	0	2	0
Supported accommodation (including supported lodging schemes, successful referrals to supported housing projects)	4	1	1	6	23	0
Social Housing - Management move of existing LA tenant	0	0	1	1	5	0
Social Housing - Part 6 offer of LA own accommodation or nomination to an RSL	15	0	0	0	42	7
Social Housing - negotiation with an RSL outside Part 6 nomination agreement	0	2	0	1	0	1
Low cost home ownership scheme, low cost market housing solution	0	0	0	0	0	0
Other (please specify in notes)	0	0	3	1	6	3
Total	136	31	59	26	188	14
Total number of cases where positive action was unsuccessful in preventing/relieving homelessness	100	59	30	26	7	7

Source: P1E Homelessness Data

- 7.14 The decline in the number of households accepted as homeless is a result of a combination of factors including a reduced number of new clients to the housing options service in 2010/11 and greater success in preventing homelessness and providing alternative housing options through the Rent Deposit Scheme.
- 7.15 Pressures on homelessness may increase as a result of housing benefit changes which could not only increase homelessness in Bedford but could also lead to a movement away from London of households that can no longer afford accommodation closer to the capital.
- 7.16 The Tenancy Deposit Guarantee Scheme (which has replaced the Rent Deposit Scheme) has supported the homelessness prevention work. The scheme aims to increase access to private rented accommodation for people on low incomes and to ensure that these homes meet minimum standards. In 2010/11, 212 tenancies were sustained by the Rent Deposit Scheme. Budgetary constraints have led to a reduction in 2011/12 in the number of properties taken into the scheme. The Localism Act increases the legal scope for the council to discharge its homelessness obligations in the private rented sector.
- 7.17 At 31st March 2011 there were 27 households occupying temporary accommodation. This compares to 38 in 2009/10 and 46 in 2008/09. There were 121 new temporary accommodation tenancies created in 2010/11. A balance has to be maintained between ensuring that temporary accommodation is available and the cost and waste of maintaining units that are not used.
- 7.18 Analysis of recent demand statistics show an increase in occupation of temporary accommodation month on month from 19 units in September 2010 rising to 35 in July 2011. Further, there has been a 34% increase in homelessness acceptances between quarter 4 last year (2010-11) and the first quarter of this year (2011-12). If this trend continues it is important to be able to deliver additional capacity in line with demand.
- 7.19 Based on our analysis of the impact of demand, provision of accommodation through private sector leasing is a prudent measure which will deliver additional capacity and savings. Therefore from 31st March 2012 the Council has contracted to provide Temporary Accommodation through Private Sector Leasing.
- 7.20 The Sanctuary scheme for victims of domestic violence helped 8 households in 2010/11. This is a scheme funded by the council in partnership with the Police Partnership Trust (Bobby Van) to enable victims of domestic violence to remain in their home. The council also supports the work of the Domestic Violence Refuge and the Asian Women's Refuge.
- 7.21 The Joint Strategic Needs Assessment developed by Bedford Borough Council and NHS Bedfordshire, found that there are significant health factors for children who are homeless including higher rates of accident and emergency attendance, mental health problems, behavioral problems, immunization and developmental delay. Parents also have a higher incidence of depression and substance misuse and tend to have a higher need for mental health services. It is important that health partners are made aware of families moving into temporary accommodation.

- 7.22 The Joint Strategic Needs Assessment proposed closer working between housing and health on issues related to families in Temporary Accommodation. The new focus on Health and Well Being will support this objective.

Single Homeless and Rough Sleepers

- 7.23 At the 31st March 2011 there were 12 rough sleepers which compares to 6 in 2009/10 and 10 in 2008/09 10 in 2007/08
- 7.24 There were 36 people being tracked by the Rough Sleepers Multi-Agency Panel in January 2010.
- 7.25 Existing provision in Bedford includes the following resources:

Table 20: Projects for Homeless Persons in Bedford March 2011

Project	Number of Beds
Barton House (Kings Arms Project)	14
Bedford Housing Link (Bedford hostels)	41
BPHA (The Foyer)	34
Emmaus Carlton	27
Night Shelter (Kings Arms Project)	18
Salvation Army Cold Weather Shelter	N/A
YMCA hostels	52

- 7.26 The council supports the work of the Bedford Supported Housing Forum and leads the work of the Rough Sleepers Multi Agency Panel. Many of those who are sleeping rough or close to rough sleeping are known to a range of statutory and voluntary agencies. These groups co-ordinate the work of different agencies with the aim of providing effective solutions to individuals and making best use of the available resources.
- 7.27 This work has a direct bearing not only on the lives of homeless people but also on the pressures that other services including the health service and the criminal justice system face.

- 7.28 The support needs of those who rely on hostel provision vary. Within this group are some with high and complex needs who are frequently excluded from existing provision as a result of challenging behaviour. The Joint Strategic Needs Assessment and the council's Supporting People Strategy have recognised the need for improved hostel accommodation in order to support the single homeless with complex needs. Approximately half of the rough sleepers at any one time are excluded from accessing hostels either due to anti-social behaviour or having been previously evicted from them. A Complex Needs scheme would be able to work with these individuals to help them access accommodation and gain or maintain their independence thereby reducing the number of individuals sleeping rough.
- 7.29 Specific guidance relating to the accommodation and support needs of 16/17 year olds was issued jointly by the Department for Communities and Local Government and the DWP in April 2010. Following from the Guidance the Council has established a protocol between Housing & Children's services which aims to establish pathways through Homelessness Legislation and the Children's Act. The guidance recommends a range of housing provision which can support young people through crisis and resettle them back with their family or provide sustainable rehousing options if this is not possible.
- 7.30 The Council is setting up a Supported Lodgings scheme for Care Leavers aged 16 and 17 years old. This will allow Young People leaving care to live in a family home type environment where they will be given support to learn life skills they need to become independent. Initially 10 places will be available as a pilot, but this may be expanded if the service proves successful.
- 7.31 There may be opportunities in remodelling outmoded sheltered housing to provide additional accommodation for single people

Black and Minority Ethnic Households

- 7.32 Table 21 shows Bedford Borough's population broken down by ethnicity, 16% of the population are from an ethnic minority. The largest proportion of ethnic minority households are Asian.

Table 21: Bedford Borough's Population by ethnicity

Summarised Ethnic Group	
Asian	14,300
Black	5,300
Chinese: Other	2,100
Mixed	3,700
White British	122,400
White Other	10,300
Total for Local Authority	158,100

Source: Bedfordshire BME Housing Group Review July 2011

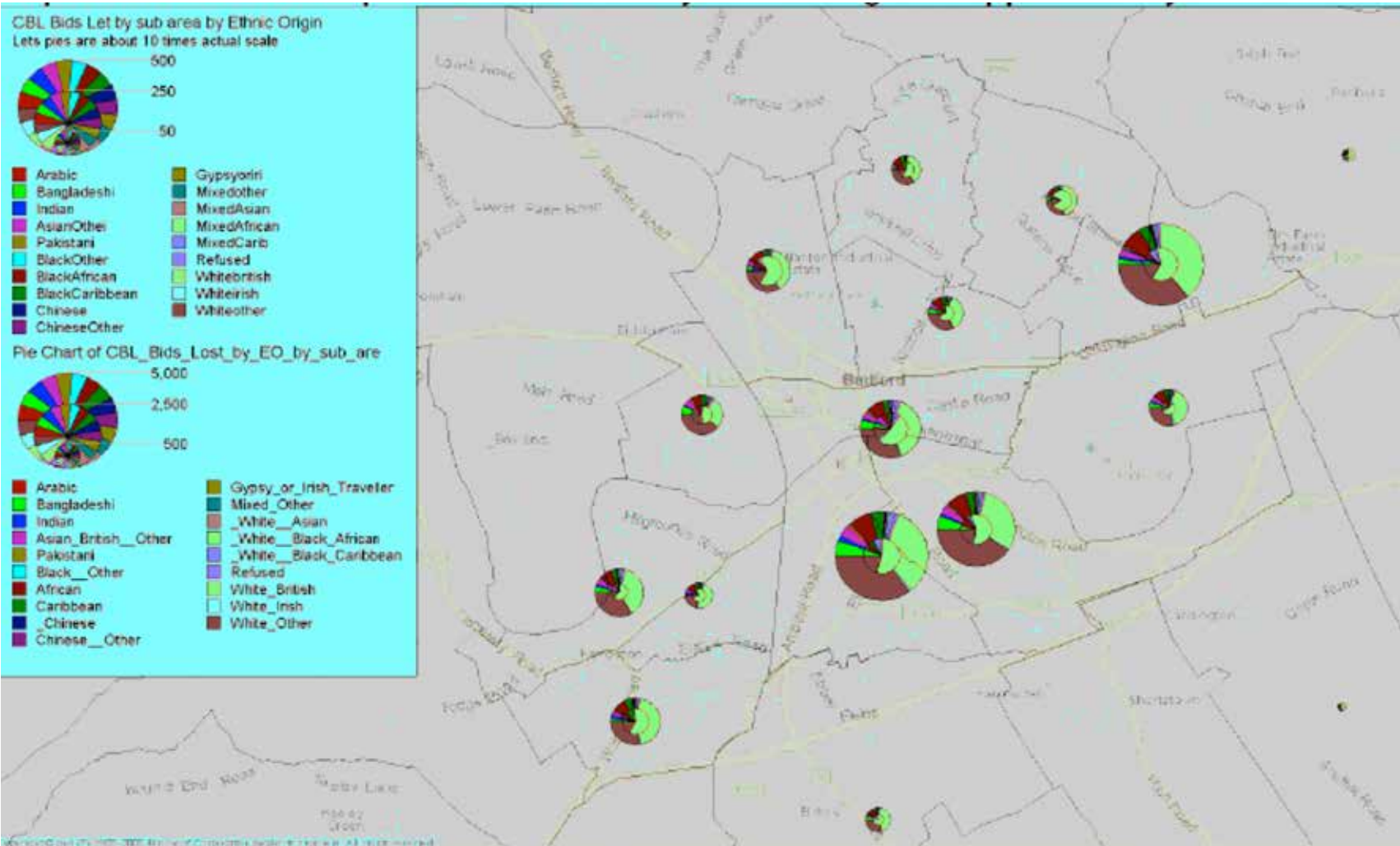
- 7.33 It can be seen from Table 22 that in March 2011 there was a higher proportion of ethnic minorities on the Housing Register compared to Bedford Borough's overall population. This could be for a number of reasons including economic and housing positions, households size and the concentrations and preferences for certain areas.

Table 22: Ethnic proportions of households on the Housing Register compared to the total population

Ethnic Origin	% on Housing Register	% of Borough Population
Asian	7.1%	9.1%
Black	10.6%	3.4%
Chinese: Other	0.8%	1.3%
Mixed	3.2%	2.3%
Refused	1.6%	-
White British	57.3%	77.5%
White Other	19.4%	6.5%
White All	76.7%	84.0%
% of all Bedfordshire applicants from Local Authority	17.2%	

Source: Bedfordshire BME Housing Group Review July 2011

Figure 23: Bedfordshire Homefinder Bids let compared to bids lost by ethnic origin of applicants by sub area



Source: Bedfordshire BME Housing Group Review July 2011

Figure 23 shows that the largest concentrations of lettings are in the urban areas of Bedford. It also shows that there are generally no obvious large discrepancies between the proportions of each ethnic group bidding for properties and the ethnicity of the winners of those bids. There appears to be no bias or distortion in which ethnic groups are more or less successful for bids in each sub area.

- 7.35 Table 23 focuses on approaches to the Council's Housing Options service. The proportion of households approaching the service that are ethnic minorities is higher when compared to Bedford Borough's population.

Table 23: Approaches for Housing Advice by year by ethnic origin

Ethnic Origin	2007/08	2008/09	2009/10	Total	% of Total
Asian/Asian British - Bangladeshi	44	42	25	111	2.3%
Asian/Asian British -Indian	55	64	59	178	3.7%
Asian/Asian British - Pakistani	33	40	30	103	2.1%
Black/Black British - African	54	45	64	163	3.4%
Black/Black British - Caribbean	36	23	38	97	2.0%
Black/Black British - Other	36	42	25	103	2.1%
Chinese	3	1	3	7	0.1%
Mixed - Other	2	2	7	11	0.2%
Mixed - White and Asian	5	1	-	6	0.1%
Mixed - White and Black African	4	2	2	8	0.2%
Mixed - White and Black Caribbean	13	7	12	32	0.7%
Not Stated	209	82	170	461	9.5%
Other	97	163	118	378	7.8%
White - British	1,007	898	827	2,732	56.4%
White - Irish	15	10	9	34	0.7%
White - Other	167	116	136	419	8.7%
Grand Total	1,780	1,538	1,525	4,843	100.0%

Source: Bedford Housing Advice Monitoring System

7.36 Both needs of homeless households and Supporting People Clients may not be evenly spread across different ethnic groups proportionate to their numbers in the overall population. Different needs are more prevalent in different communities depending upon factors such as age profiles, culture, behaviour patterns, wealth and income.

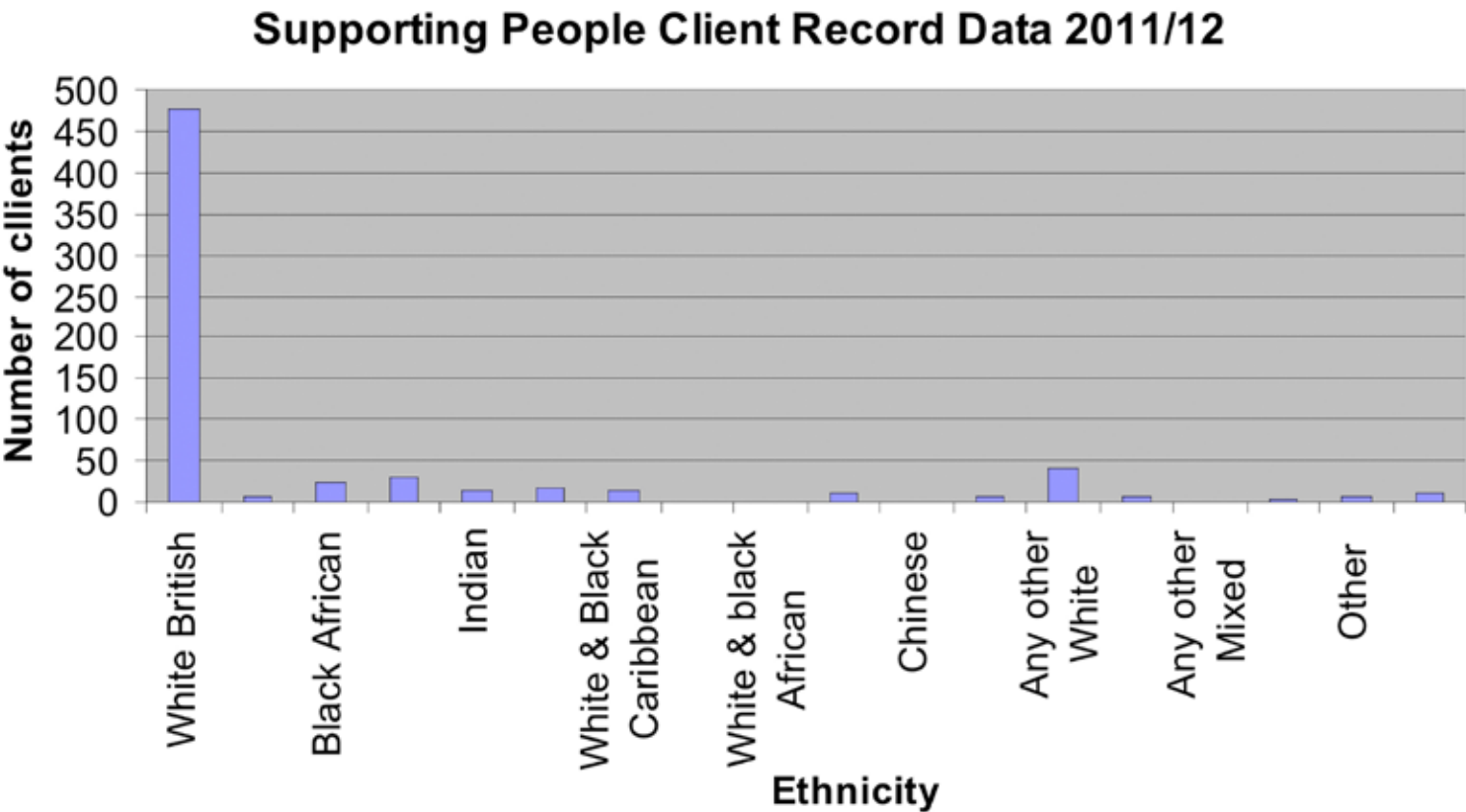
Table 24: SP Client Records Data 2009-10 Ethnic origin

Ethnic Origin	Bedford
Missing	6
White - British	1,000
White - Irish	27
White - Other	107
Mixed - White and Black Caribbean	27
Mixed - White and Black African	7
Mixed - White and Asian	4
Mixed - Other	7
Asian/Asian British - Indian	65
Asian/Asian British - Pakistani	15
Asian/Asian British - Bangladeshi	15
Asian/Asian British - Other	8
Black/Black British - Caribbean	28
Black/Black British - African	22
Black/Black British - Other	8
Chinese/Other Ethnic Group: Chinese	7
Chinese/Other Ethnic Group: Other	26
Refused	22
Gypsy/Romany/Irish Traveller	9
Total	1,410

Source: Bedfordshire BME Housing Group Review July 2011

7.37 The following Figure 24 shows the ethnicity of Supporting People clients in 2011/12. The highest proportion of clients (71%) are White British which, when compared to the Census 2001 data for Bedford Borough is lower than the overall proportion of White British households living in Bedford.

Figure 24 2011/12 Supporting People Client Record Data

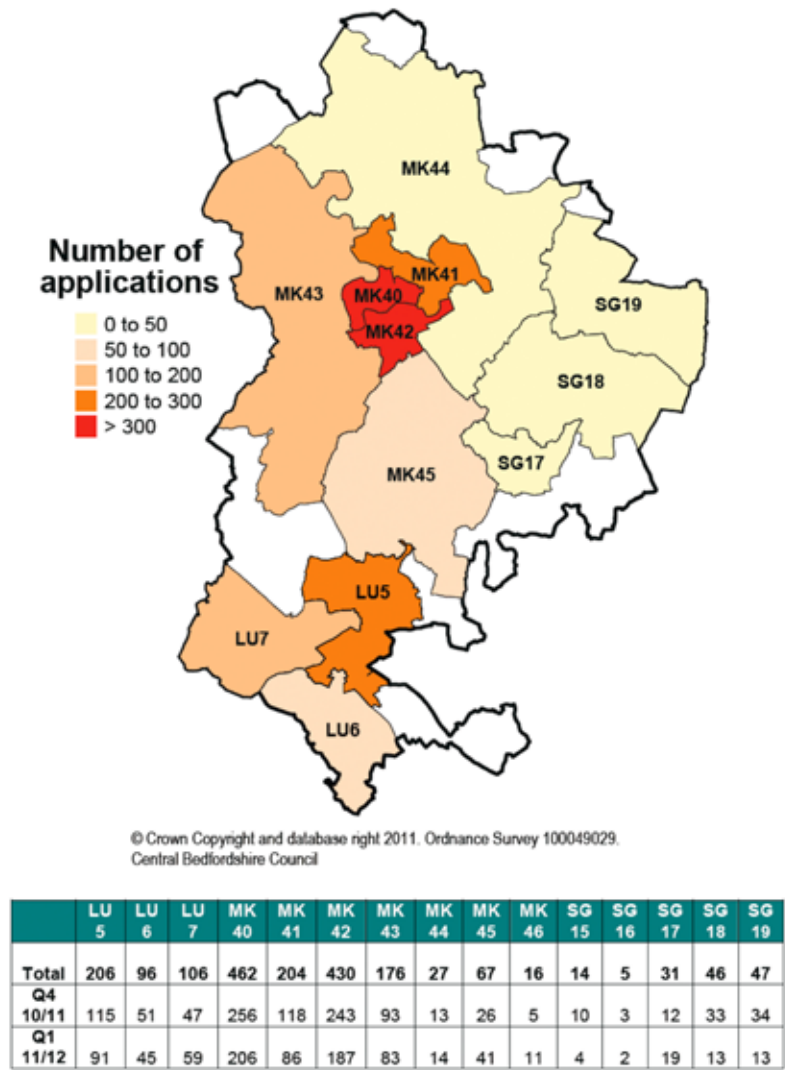


Source: Supporting People Client Record Data

Migrants

7.38 Figures 25 and 26 below show the number of applications to the UK Border Agency (UKBA) for permission to stay in the UK over a 6 month period from January – June 2011. The data shown represents individual applications for indefinite leave to remain, limited leave to remain, EEA residence permits and British citizenship. The figures include applications for asylum in the UK.

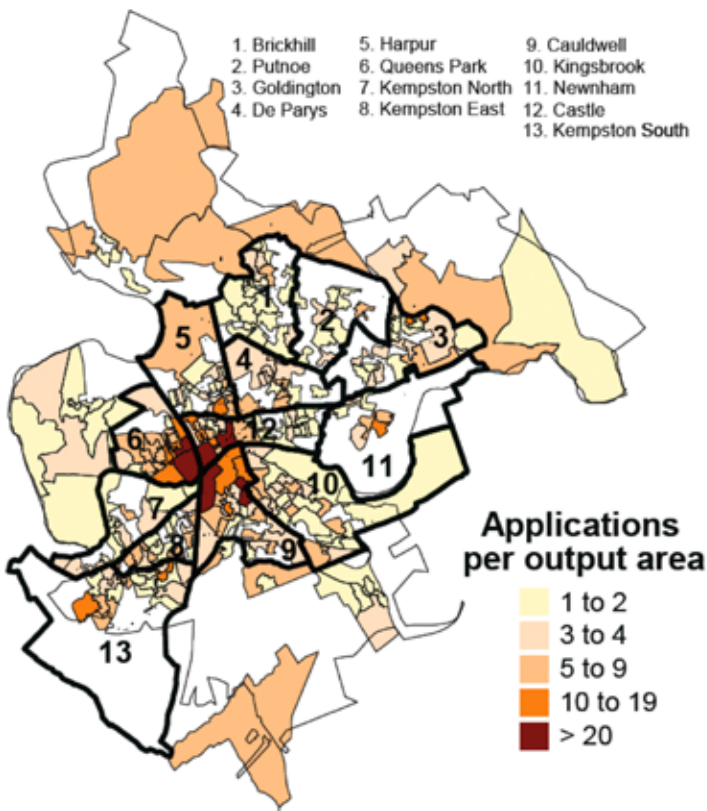
Figure 25 and 26: Number of applications to the UK Border Agency



Source: New Migration Partnership Intelligence Report, July 2011

7.39 The figures show that over 1,096 applications were in the Bedford Borough postcodes MK40, 41, and 42. Figure 27 shows these postcode areas in more detail. Each output area has a population of about 300 people. Clusters of applications can be seen to the east of Queens Park ward, west of Castle Ward and south of Harpur ward and the north of Cauldwell ward.

Figure 27: Applications to UK Border Agency in MK40, 41, and 42



Source: New Migration Partnership Intelligence Report, July 2011

Note: since the research was carried out, some of the ward boundaries have changed

7.40 Table 25 below shows the nations represented in the above Bedford Borough postcode areas.

Table 25: The most represented nations in Bedford Borough Postcodes MK40, 41 and 42

Origin	MK40	MK41	MK42	Total ³
India	71	60	130	275
Pakistan	97	4	21	123
Bangladesh	50	3	30	83
Zimbabwe	11	23	27	63
Nigeria	19	13	18	50
Afghanistan	26	1	14	41
Poland	12	3	24	40
China	18	4	4	30

Source: New Migration Partnership Intelligence Report, July 2011

Migrant Workers

7.41 Migrant applications for National Insurance numbers in 2005/06 and 2006/07 are shown in table 26 below.

Table 26: Migrant applications for NI Numbers

Origin	2005/06	2006/07
A8 Countries	1490	1430
Rest of Europe	230	180
Asia	330	280
Caribbean	20	10
Africa	160	100
Other	80	80

7.42 Migrant workers are required to work continuously for twelve months before becoming entitled to income related benefits.

- 7.43 Problems identified in national literature include severe over-crowding and vulnerability to employers and employment agencies. Rent is often deducted from wages and the loss of employment is followed by homelessness.
- 7.44 The Joint Strategic Needs Assessment identified as a priority undertaking a needs assessment of migrant workers.

Gypsies and Travellers

- 7.45 The council is under a legal obligation to assess the needs of Gypsies and Travellers. The current requirement set down in the Regional Spatial Strategy (The East of England Plan) is for 46 permanent pitches by 2021. The Localism Act paves the way for the revocation of the Regional Spatial Strategies but at present they remain in force. The council seeks to provide for the needs of gypsies and travellers by identifying suitable sites for the provision of pitches and has sought funding from the Homes and Communities Agency to support the provision. The council is concerned to minimise unauthorised encampments.
- 7.46 The council currently manages one permanent Gypsy and Traveller site in the borough and this is located at Kempston Hardwick. The council is currently considering how the requirement set down in the Regional Spatial Strategy can best be accommodated. This target will itself be subject to review once the Localism Act is brought into effect.
- 7.47 The council is also working towards the provision of an Emergency Stop-Over site, additional pitches at Kempston Hardwick and further permanent provision.

Older people

- 7.48 Some older people will chose to move to specialised accommodation. The Older People's Accommodation Strategy found that the current range of such accommodation does not meet current needs or those likely to emerge in the future. There is a need to remodel and upgrade the existing stock of sheltered housing for rent and to increase the amount of extra care housing (both for rent and for sale) and sheltered housing for sale.
- 7.49 Although Bedford has a sufficient supply of general registered care homes there is a limited need for additional residential care with nursing capacity.

7.50 The following applications have been made and have either received planning permission or are pending decision.

- Manton Lane – 14 bed acquired brain injury facility associated with already approved 78 place care home
- St Leonards Street – permission granted 2011 – 50 bed care home with nursing
- Wyboston – resolution to grant permission 2011 - 60 bed care home with dementia provision
- Turvey – permission granted 2011 – 38 care beds and 108 sheltered housing for sale/extra care units
- Warwick Avenue – pending decision – 67 bed care home with nursing – 47 extra care flats
- Progress Ford (Broadway) – pending decision - 112 room specialist care home
- Wimborne Court – permission granted 2011 – 34 bed care home

7.51 The Older Persons Accommodation Strategy indicates that these applications, if granted, will provide a suitable alternative to residential care and meet what would otherwise be the estimated need for care home place in Bedford to 2016.

7.52 The council will work with Registered Housing Providers, Care Providers, and developers to reshape the accommodation offer to older people in line with the Older People's Accommodation Strategy. The council has worked successfully with registered providers to create two new extra care schemes both of which are now being built. St Bedes on Bromham Road is a scheme of 104 homes for rent and shared ownership being developed by Orbit Housing Group. Gordon Colling House off Eastcotts Road will provide 55 homes for rent developed by BPHA,

7.53 The Joint Strategic Needs Assessment identified dementia as a key issue and prioritised greater awareness and early diagnosis and support for people in their homes. It also supported increased provision of extra care housing and improved quality of care for dementia sufferers in care homes.

7.54 The Joint Strategic Needs Assessment found that 30% of people 65+ living in the community will fall once a year and that this rises to 50% for people 80+. The range of measures to address this includes identifying and reducing fall risks at home.

7.55 The growing number of older people within the population was identified by both the Strategic Housing Market Assessment and the Joint Strategic Needs Assessment as a key issue.

7.56 The Supporting People strategy also states that the largest gap between need and supply is in older people's services. This is largely due to the growth in the older population living at home but needing support to remain there.

7.57 The council has completed an Older People's Accommodation Strategy. The strategy notes the wish of a high proportion of older people to remain in their homes. This creates a focus on a number of key issues:

- The care and support services available to older people at home
- Hard to heat homes, energy conservation and fuel poverty
- Aids and adaptations required to enable people to remain in their homes
- Reducing the risk of falls in the home
- Telehealth and telecare

7.58 The House Condition Survey found that both poor thermal comfort and falls in the home are the major hazards associated with poor housing.

Mental Health

7.59 The Joint Strategic Needs Assessment found that mental ill-health is likely to increase, primarily as a result of changing population. It found that mental ill-health is strongly correlated with social deprivation. The level of need in each ward is indexed against an average. The index is highest in Harpur Ward at 1.59 (i.e. the incidence is 59% higher than the average) followed by Queens Park (1.38), Cauldwell (1.35), Castle (1.34) and Kingsbrook (1.23).

7.60 Consultation events found that people preferred to have their mental health issues managed in primary care. Improved housing and supported accommodation were identified as a particular need. The Joint Strategic Needs Assessment concluded that improved housing and support options are a priority.

7.61 The Supporting People Needs Assessment also identified gaps in service provision. For example there is a need to improve existing hostel provision and to improve access to accommodation.

People with Learning Disabilities

7.62 Agencies working in Bedford Borough work with the following definition of learning disabilities which is taken from the Department of Health White Paper, Valuing People' 2011:

- A significantly reduced ability to understand new or complex information, to learn new skills (impaired intelligence), with;
- A reduced ability to cope independently (impaired social functioning);
- Which started before adulthood, with a lasting effect on development

- 7.63 The British Institute of Learning Disabilities (BILD) estimates that there are currently 985,000 people in England with a learning disability equating to 2% of the population. Using this to estimate that 2% of Bedford Borough's population has a learning disability would mean that 2,004 people aged between 18 and 64 have a learning disability.
- 7.64 A total of 508 adults with learning disabilities are known to the Council. About 150 live in residential care in the borough and about 50 live in residential care outside the borough.
- 7.65 The occurrence of learning disabilities is predicted to increase in line with population growth. Mild to moderate learning disability is linked with poverty and are higher in deprived and urban areas. The assumption is made that the number of adults with learning disabilities be concentrated in Bedford Borough within wards of higher deprivation, such as Castle, Cauldwell, Goldington, Harpur, Kempston North, Kempston South, Kingsbrook, Queens Park Wards.
- 7.66 The JSNA highlights that the three top priorities relating to people with learning disabilities are:
- Improve health and wellbeing of people with a learning disability and their carers
 - Annual health checks and health action plans
 - Equity of care and treatment in all settings
- 7.67 The Joint Strategic Needs Assessment recognised a need to support people with learning disabilities into more independent living in their own homes. To achieve this, a programme is under way to provide more supported accommodation for people with learning disabilities. This programme needs to be extended and developed.
- 7.68 The Council has developed an Autism Strategy which includes a commitment to "review the Supporting People Strategy and work with housing providers to understand the needs of people with autism and how these can be supported."

People with Physical Disabilities

- 7.69 In 2009 the borough recorded 7,680 adults as having a moderate physical disability. The Joint Strategic Needs Assessment forecast that this will rise by 5% by 2015. Disability affects all age groups but has a higher prevalence amongst older people and numbers will therefore increase with the growing aging population.
- 7.70 The council has a statutory obligation to provide grants for qualifying adaptations and alterations to qualifying individuals. Registered Providers are also under an obligation to provide adaptations and alterations and the council has agreements with Registered Providers to match fund this work.

7.71 The council has worked with Central Bedfordshire Council, Luton Borough Council, registered providers and Bedfordshire Homefinder (the Choice Based Lettings provider) to create an Accessible Housing Register to optimise the use of properties that are suitable for people with disabilities. At November 2011 there were 3065 households on the Housing Register. Of these, Table 27 and 28 below show where the first applicant and joint applicant has a disability. The total number of applicants total 526 which is 17% of the total housing register.

Table 27: Applicant where first applicant has a disability

Description of disability	Number of applicants
Physical	234
Sensory	15
Learning	42
Mental	113
Multiple Disabilities	37
Hidden	25
Total	466

Table 28: Applicant where joint applicant has a disability

Description of disability	Number of applicants
Physical	40
Sensory	3
Learning	3
Mental	10
Hidden	4
Total	60

The following table 29 shows those applicants who have been assessed as having Mobility category on the Accessible Housing Register.

Table 29: Number of applicants with Mobility category

Mobility Category	Number of applicants
MOB1	18
MOB2	8
MOB3	16
MOB4	14
MOB5	82
MOB6	9
Total	147

Key: Assessments of Mobility Categories are complex, and based on information the applicant provides about, e.g. wheelchair use, ability to use bath facility, number of steps which the person could manage, walking aids used etc. Broadly though:

MOB 1 - full time wheelchair user needing access to all rooms in property

MOB 2 - full time wheelchair user needing access to some but not all rooms in property

MOB 3 - partial wheelchair user – outdoors but not inside property

MOB 4 - needs level access property and facilities e.g. shower

MOB 5 - can manage up to 4 steps/stairs (using aids) and a shower with threshold

MOB 6 - requires lifetime home to accommodate degenerative condition

- 7.72. The Council is mindful of the need to include bungalows and ground floor flats suitable for wheelchair users subject to site constraints and viability and this is reflected in the Mobility Housing guidance adopted by the Council in 2002. Planning Policy H34 does not provide a specific target although a 10% target is included in the Council's guidance. It is accepted that the Council's current mobility guidance falls short of requiring full wheelchair accessibility. Consideration therefore needs to be given to reviewing the guidance or including up to date requirements in future planning policy.

Key Issues facing the Borough

- 7.73 Key issues in relation to this theme are:-

- Changing legal requirements and financial pressures mean that the council will need to refresh and develop its strategies to meet the council's obligations to the homeless, making the best use of the resources available. A continuing supply of affordable housing and full use of the private rented sector will be important to achieving this objective
- The potential for increased demand for homelessness services, which would require the Council to monitor capacity and, if necessary, take appropriate action to avoid the use of bed and breakfast accommodation to deal with homelessness
- The council will need to continue to use homelessness prevention strategies to maintain the decline in the numbers of households accepted as homeless which has halved between June 2005 and September 2010
- Whilst the number of rough sleepers has reduced there is a need for improved hostel accommodation to support the single homeless with complex needs
- There is a need to have a greater understanding of the housing needs of migrant workers
- There is a need to make provision for Gypsy and Traveller pitches within the borough
- The largest gap between need and supply is in the provision of suitable accommodation for older people. There is a need to remodel and upgrade the existing stock of sheltered housing for rent and increase the amount of extra care housing (to rent and buy) and sheltered housing for sale. The extra care homes under construction will need to be complemented by further developments over the life of this strategy
- There is a need to improve or re-provide existing schemes including the domestic violence refuge and projects for people with mental health issues
- Supported accommodation for people with learning disabilities
- There is a need to review existing Mobility Housing guidance

Key Actions

1. We will:
 1. **Work with partners and with Adult Services to make best use of the limited available resources in meeting the needs of vulnerable people**
 2. **Develop and work with partners to implement a commissioning approach that will deliver the required accommodation and support services**
 3. **Work with partners to provide:**
 - Additional extra-care places for older people for rent and sale
 - Improved supported housing for people with mental health issues
 - Improved provision for victims of domestic violence
 - Supported accommodation for people with learning disabilities
 - Improved hostel accommodation for the single homeless through the provision of a specialist facility for single homeless with high and complex needs
 4. **Continue to provide housing and homelessness advice and prevention**
 5. **Encourage the private sector to provide sheltered housing/extra care housing in appropriate locations**
 6. **i) Identify sites for Gypsy and Traveller accommodation**
 - ii) **Bring forward the proposed extension at Kempston Hardwick and the Emergency Stop-Over Site at Meadow lane**
 - iii) **Promote the development of a permanent site for up to 14 pitches at Meadow Lane**
 7. **Prepare Accommodation Strategy for Vulnerable Groups**
 8. **Work closely in partnership with health (including SEPT) and social care services in the statutory and community and voluntary sectors to ensure the housing needs of vulnerable people are met by an integrated approach**
 9. **Refresh the Homelessness Strategy**
 10. **Review existing Mobility Housing guidance (or exploring up to date requirements in a future planning policy) as well as scoping what guidance/policy would be appropriate for wheelchair housing**

Key Partners

7.74 The following partners will be crucial to delivering the targets and objectives for this strategic theme:-

- Care and support providers
- Registered Providers
- SEPT
- Citizens Advice Bureau
- Temporary accommodation providers
- Homelessness charities

Resources

7.75 The Operational Housing revenue budget for the Housing Options Service in 2012/13 is £692,100 of which £220,180 is funded by government grants.

The net Operational Housing Budget for Gypsies and Travellers for 2012/13 (after deducting £66,230 rent and other income) is £40,620.

There is a Capital Programme funded through Homes and Communities Agency grants for Gypsies and Traveller sites of £1,499,000.

The revenue funding for Supporting People, excluding service grants is £167,740.

The revenue budget for Supporting People grants in 2012/13 is £3,940,930.

There is a Capital Programme budget of £957,000 to fund a complex needs project for the single homeless.

Finding out more

If you would like a large-print copy or information about us and our services, please telephone or write to us at our address below.

Për Informacion	معلومات کے لئی	برای اطلاع	للمعلومات	Za Informacije
ਜਾਣਕਾਰੀ ਲਈ	Per Informazione	Informacja	তথ্যের জন্য	



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