Forest of Dean Housing Delivery Note 2022 2023

Contents

1 Introduction

1.1 This note provides a brief commentary to accompany the housing trajectory for 2023-28 for the Forest of Dean District (FoDD). It concentrates on the delivery and activity during the past year (2022/ 23).

1.2 Overall a very significant increase in the number of completions was recorded. A total net figure of 517 housing completions was recorded for 2022/ 23 compared with 493 for the previous year and 358 for the year before. The current LP requirement is 330pa as recorded in the 2018 Allocations Plan. This Plan will be five years since adoption in June 2023 and thereafter the calculation of housing need (the "standard method") will be applied. This based on the period 2023-33 using the 2014 forecasts from ONS arrives at a need of 256 dwellings per year. When the affordability ratio (8.54 for 2022) is applied the annual requirement or new housing is 329 or 6580 over 20 years. The future availability of land for development is assessed against this requirement.

1.3 The number of completions recorded shows 197 in Lydney, 26 in Tutshill/ Sedbury, 77 in Coleford,119 in Newent and 17 in Cinderford. Small sites (under five dwellings net) may have been affected by the slow down in activity early in the financial year with a reduced number of completions recorded across the whole district.

1.4 With a Plan requirement to provide 6600 dwellings over the 20 years 2006-26, the net total now provided is 5370, which equates to an average of 316 per year, or 81% of the total provision that the LP seeks. In order to provide the entire LP requirement over the next three years (to the end of the plan period) 410 dwellings per year would need to be completed. This figure is below the number of completions counted over the last two years (1010).

1.5 The trajectory table shows estimates for future completions, and a future supply of about 3.75 years. The actual availability figure may vary as sites presently allocated come forward and is likely to increase. It is unlikely that there will be no completions within five years on sites that do not at present have detailed permission. The sites are discussed in greater detail below.

2 Review

2.1 Over 2022/2023 a record number of completions were recorded, 517 net. This followed a slightly lower but still high number (493) in 2021/22. It is a function of the scale of activity on sites being developed by private housebuilders as well as the high level of activity providing affordable homes on sites that are 100% affordable. Overall activity is summarised in the accompanying trajectory table.

2.2 Of the total delivery of 517 dwellings in 2022/23, 163 (31%) were affordable divided as follows:

2.3 75% of the affordable homes (123) were affordable housing for rent, with 23 of these specifically for social rent. The remaining 25% (40) were provided as shared ownership homes.

2.4 The homes were provided right across the district with 28 in Newent, 48 in Lydney, 45 in Coleford, 12 in Sedbury, whilst 30 homes were also provided in rural parishes. Homes also ranged from one-bedroom flats and two-bedroom bungalows to larger four-bedroom houses.

2.5 All of the affordable homes delivered achieved an energy performance rating B, meaning they will produce less carbon dioxide when compared to an average energy performance rated property (the average rating for homes in the UK is D).

2.6 the following sites delivered the affordable homes:

Location	number
Lower Lane, Berry Hill ColefordP1482/14/OUT	29
Sonoco Former 59 Tufthorn Avenue Coleford P0912/16/OUT	16
Land At Mannings Farm Drybrook P1729/16/OUT	24
Highfield Road Lydney P0108/17/FUL	16
Land Between Lydney Bypass And Highfield Road, Highfield Road P0260/20/APP	16
Land Between Lydney Bypass And Highfield Road, Highfield Road P1953/19/APP	16
Land North Of, Southend Lane Newent P1330/18/OUT	28
Unlawater lane Newnham P1733/18/FUL	6
Land Off, Beachley Road Sedbury P1792/13/OUT	12

Table 1

2 . Review

Lydney

2.7 The trajectory table shows that much of the current activity is in Lydney where there is scope for at least 388 completions over the next five years with over 300 of these on sites that are presently under construction. Further allocated land including some with outline consent is capable of providing an additional 581 dwellings according to the full trajectory table. The majority lie in an area where much of the strategic infrastructure has been provided or provided for in the east of Lydney neighbourhood and a start on earthworks on the site at Allaston (where there is detailed permission for the first phase and an outline consent for 200 dwellings) adds to this. A completions rate of about 140 per year on the major sites (ie not including smaller sites, windfalls and prior approvals) was assumed previously and is still considered realistic though it should be noted that nearly 200 dwellings were completed in the past year. The prime consideration will remain the market and the programmes of the individual builders which are clearly capable of supporting a higher rate of completions although variations in the delivery of affordable homes could vary this figure. There are presently six volume builders with recent (2020 on) or current involvement in the Lydney east development (Redrow, Crest, Barratt/ David Wilson, Bellway, Edenstone and Persimmon). If market conditions remain as they are a reasonable assumption would to expect a larger number of completions than the 398 (80pa) shown in the trajectory as new full permissions are granted on the land which currently is either allocated or is the subject of outline consent. This figure at 140pa is 700 over five years and is considered a reasonable estimate of the potential dwelling supply in Lydney over that period. Within the land to the east of Lydney, there are current pre application discussions and current applications which support the continued development of the town at at this rate.

Newent

2.8 In Newent there are three sites under construction which will deliver 182 dwellings (119 completions in 2022/23) all likely to be completed within five years. Smaller sites in the town will add to this total. There are two additional sites which are allocated but these are at present not assumed to deliver any dwellings in the next five years. Their capacity is about 70 dwellings.

Coleford

2.9 For Coleford, there is one large site with detailed permission for 203 dwellings which is partially complete and an additional smaller site with detail approval that will make an additional contribution. These together will supply 113 dwellings. A further contribution within five years is assumed from one allocated site which has an outline consent in part (15) and two smaller sites under construction (8). Further allocated or permitted sites will add to this possibly over the next five year period. These, the site with outline permission for part, and two which are the subject of current detailed applications by builders could add an additional 291 dwellings. Overall one pending full application from a developer/ builder for 90 as the first phase of an allocation, and a further contribution from the site with outline permission are considered reasonable additions to the minimum expected supply. An additional 110 dwellings is appropriate as a realistic estimate though at the low end of the potential for an additional 291.

Cinderford

2.10 In Cinderford there was one modest scheme completed last year and three schemes with a current consent which are assumed to make a contribution inside five years. In addition there are allocated sites, one with outline permission for 49 which is the subject of pre application discussions which is likely to come forward though not counted in the five year supply and one further area (the northern quarter) which has a valid outline permission but is being re considered in terms of how it might progress (much of the land is owned by the council). Other allocated sites remain subject to pre application discussions and may deliver some housing during the next five year period though they are not counted in this five year assessment.

Sedbury / Tutshill

2.11 Following a period of activity the remaining "large" site (large is defined as over five net capacity) at Tutshill/ Sedbury was completed in 2022/23 delivering 26 dwellings, there are no other committed large sites at present except a small conversion for nine.

2.12 The tables below summarise the situation in relation to the five larger settlements and in the villages where there are current sites of over 5 dwellings.

Location	Large sites listed- dwellings yet to be started or completed	supply (NPPF deliverable minimum)	likely number available
Lydney	Lydney east- continuation of development on allocated sites/ permitted sites also other permissions within the town	388	700
Newent	One major site to be completed (total capacity 230) and two others under construction (capacity 40, 50), smaller sites continuing	182	182
Coleford	One major site under construction (capacity 203) and others allocated and or with permission/ current applications	136	246
Cinderford	some allocated and permitted sites, also smaller sites with permission	46	46
Tutshill/ Sedbury	no further large sites with permission or allocated one conversion site	9	9
TOTAL		761	1183

Table 2 The table summarise the conclusions in relation to the five larger settlements.

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Villages

Location	Sites listed- dwellings yet to be started or completed	minimum supply
Alvington	One site with full permission	11
Bream	Two sites with full permission one with revised application one commenced (9)	17
Drybrook	two additional sites without consent but allocated (+67)	0
Hartpury	One site with full permission	11
Huntley	One allocated site with outline permission (11) with current RM application one conversion (8)	19
Littledean	One site technically commenced	17
Longhope	One site under construction	23
Lydbrook	One site subject of RM application (26)	0
Mitcheldean	Three allocated sites no current permissions	0
Newnham	One site under construction (77 not completed) one allocated no permission (20)	45
Sling	One site allocated no permission (20) one with consent (9)	9
Whitecroft	One allocated site current outline application (66)	0
Woolaston	Two sites one allocated (12) one with o/l pp (36)	36
TOTAL		188

Table 3 Village sites, yet to be started or completed

2.13 There is scope for additional completions during the five year period in addition to the minimum referred to above, which could if sites with outline permission are included bring the contribution to about 250.

Other district wide contributions

2.14 In addition to the sites that are assessed individually above, there will be continued contributions from those of five or less net capacity. These have been monitored since 2006/7 and the average contribution is 83 units per year. Over the last 10 years the average was 68pa and for the last five, 60. The actual figure of completions from these small sites is quite variable. It reflects changes such as the use of Prior Approvals and conversions from other sources as well as recent constraints such as the pandemic. For the present a reduced figure of 60pa has been applied giving an expected 300 dwellings on small sites over the next five years.

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2.15 In addition to the on going contribution of small sites, there are likely to be sites coming forward and delivering new dwellings over the next five years which are neither allocated nor have permission at the present time. Although their number is small, they should be allowed for. Historically FoDDC allowed for a total of 81 pa which was supported by past contributions. With an increased emphasis on the Allocations Plan and its implementation however a reduced figure still with no allowance until year three and then a progressive increase. Within five years a figure of 48 is used as a likely contribution from windfall sites of over five dwellings, this being geared to an expectation that dwellings from this source may average 40pa in the longer term but that it is only the sites that are unknown at the start of the five year period that are to be counted.

3 Conclusion

3.1 The supply arrived at from the above estimates is as follows:

Source	NPPF deliverable	likely available
Towns and Tutshill/ Sedbury	761	1183
Villages	188	218
Small sites throughout district	300	300
Windfall sites over five dwellings	48	48
TOTAL	1297	1749
Requirement (inc 5% addition)	1727	1727
Supply (1297/1727)*5 or (1749/1727)*5	3.75	5.06

Table 4 Housing Supply from estimates

3.2 The NPPF deliverable assessment shows less than a five year land supply. The wider calculation shows one marginally in excess of the requirement but still one that underlines the need for the LP review to provide additional sites that could be taken up in the short term. There is scope in the form of allocated sites and sites with outline consent to come forward in addition to those counted in the above table should the demand support this. All depends on planning applications which mainly stem from demand and the wishes of individual developers.

Replacement Local Plan

3.3 In June 2018 the FoDDC Allocations Plan (AP) was adopted. It included an updated calculation of housing requirements in accord with the then guidance. It established the housing requirement and provided a supply that was endorsed by the Inspector once his recommended modifications were made. It is supported by the 2012 Core Strategy. The calculation of housing requirements reverts to the standard method as in the NPPF and associated guidance once a plan is five years from adoption and this applies to the FoDDC Plan from 28th June 2023. The annual requirement set in the AP is 330pa and the standard method at present leads to a figure of 329pa although these are derived in a different manner. Most importantly the standard method is one based entirely on a figure looking forwards with an adjustment intended to take account of the relative affordability in each district and this calculation is the one used for this note.

3.4 The replacement Local Plan for the FoDD remains at an early stage of development. Two consultation exercises based on potential strategies have been completed the most recent in late 2022. Both used the standard method of calculation housing requirements and both took a figure of approximately 7440 dwellings to be required as the starting point for any planned provision. Although later ONS forecasts have been prepared the 2014 figures are still to be used as required by guidance. The affordability figure (a ratio of house prices to earnings) does change on an annual basis and the current forecast is based on the latest (2022) affordability figures and looks to the forecast household numbers for the period 2023-2033 in the forecast prepared using 2014

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figures. This has changed the annual requirements from about 374pa to 329. Over a 20 year plan the total completions that would be needed to be provided for would be 6584 not 7440 as previously used.

3.5 The current figure of 6584 is used for this paper. It comes at a time when the standard method itself is being reviewed and may in future be changed. Its base (2014 ONS forecasts) is well out of date. Changes to a more recent base could change the housing requirement and this will need to be taken into account when the LP is compiled. Such changes are likely to be a live issue through the LP examination and before. Alongside the possible (probable) change of the base date for the ONS forecasts is the possibility of changing the way in which affordability is taken into account. This is currently based on a ratio of median house price to median workplace based earnings. This may remain the recommended approach or may not, whatever its shortcomings.

3.6 In early 2023 there was an outstanding consultation on reforms to the LP system. Some of the proposals could provide LPAs with some greater flexibility over the application of the standard method. It seems likely to remain the starting point for calculations at the present time (April 2023) but a degree of flexibility may be introduced albeit one that may not offer a great deal of scope to challenge the figures in some LPA areas.

Housing Delivery Test

3.7 The Housing delivery test (HDT) is a measure of actual delivery of new dwellings, measuring numbers delivered over a rolling three year average. It sits alongside the requirement to have a land supply sufficient to meet the needs of a plan. LPAs are expected to deliver (really facilitate) 95% of their assessed housing requirement in order to meet the HDT. This, being based on actual completed units lags almost a year behind events. For the most recent HDT year (2022/23) however FoDDC will report a total delivery well in excess of the three year requirement. the HDT requires delivery of over 95% of the required number which for the FoDDC would mean over 940 dwellings over the past three years. The actual delivery of 1368 dwellings (net) is 45% over the HDT requirement. The HDT itself iis under review but it is very unlikely that the current delivery at the FoDD will show anything other than a comfortable excess over the requirement.

Site distribution and nature

3.8 The majority of sites which are under construction are being built by private developers and these include major national companies as well as more local. A significant number are also being developed by Registered Providers who are active across the FoDD and again contributed to the very high and welcome number of affordable homes that were delivered. There are two such sites recently completed and a further one under construction at Newent. Further similar schemes with permission are expected to come forward with the guidance and assistance of the FoDDC working in conjunction with the relevant RPs.

3.9 Of the private (market) sites which in almost all cases provide a share of affordable housing, the greatest level of activity is in Lydney as referenced above. This reflects the allocations made and almost another 1000 dwellings are expected before the existing committed sites are complete. This is likely to provide an on going supply of new dwellings for some years although recent evidence suggests the rate of delivery could be more variable than initially assumed, with 200 completions last year above a previous average over three years of about 140-150. As referenced above the trajectory assumes about 400 of these could be delivered inside five years although a

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larger number are considered to be potentially available within that time frame and the current rate of delivery would easily support this. The single largest sites outside Lydney are at Newent with a development of 230 dwellings under way and one of 203 at Coleford both under construction. Various smaller sites are active across the district, and some with current applications which are not yet under construction are available or likely to be so over the five year period.

Trajectory tables

Note: For the trajectory tables, two sets of estimates have been provided, expressed as a minimum and maximum. In practice the actual availability is likely to lie between the two, as sites with outline permission come forward and receive detailed approval and as some sites that are allocated in the AP are taken up. Individual sites and estimates of their availability are considered above.

3.10 The sections in the trajectory table are as follows.

Minimum deliverable- sites which strictly meet the definition in the NPPF of deliverable taking into account marketing constraints where appropriate. These sites and an assumed contribution from small sites (less than six dwellings) and windfall provide a supply of 3.75 years- 1297 dwellings (based on a requirement of 329pa and then applying a 5% buffer to give a total requirement of 1727).

Maximum available- sites considered able to deliver new dwellings over the next five years but not all with detailed permission. These sites would provide for a supply equivalent to 5.06 years or 1749 dwellings. This group includes sites that are likely to come forward under current conditions and some that could do so if for example the demand rose. The calculation does still exclude some allocated sites and others where there is a greater degree of uncertainty. The actual supply is likely to be between the two figures. Activity and the flow of planning applications needed to secure a supply depends on economic conditions as well as there being an adequate supply of land which can be developed. A significant slow down in completions could occur which the FoDDC would have little or no influence over.

A notable feature of the graph and tables is the relatively high level of completions expected in the first two years of each second five year period especially in the case of the minimum deliverability. One reason for this is that there are a number of sites that do not meet the terms set out in the NPPF for them to be "available now" for example they may not have a full permission so would need other evidence in their support in order to be counted. Many of these form a pipeline and will receive detailed consent in due course. Some have outline consent on behalf of the owner who may not be builder. As a result some of these sites are listed as being developed in the second five year period rather than the first but there is a good level of confidence that those so listed are capable of delivering as indicated or in advance of the dates shown.

Completions in 2022/23 reflect the current high level of activity and are likely to remain relatively high (above the annual average required) in the immediate future as the readily available sites are taken up. Beyond these there is a need for new sites to follow by being allocated in the new LP. It is likely that smaller sites (one to five net dwellings) which may have been delayed due to the pandemic will continue to make a significant contribution.

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Summary of Housing Land Availability

- **Five year land supply- 3.75 years minimum**
- Total available 5.06