

Housing Need Supply Update Keynote

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1 . Introduction

1 Introduction

1.1 This paper outlines the current position in respect of the assessment of the need for and the provision of sites for housing as in the AP. It outlines the evidence that has been used for the update and then with the conclusion from this exercise shows how the sites concerned are considered sufficient to meet the needs of the AP and are also able to ensure that the requirement for a five year land supply (in July 2015) is able to be met.

1.2 The basis for the AP is the adopted CS. This is just over three years old, having been adopted in February 2012. It therefore predates the NPPF and its on line guidance (NPPG). The bulk of the CS contains policies which need to be regularly considered in terms of whether they are still relevant but do not date in the sense that those that seek to make numerical provision for say housing or retail space do. The way in which the CS sets out and seeks to achieve sustainable development is compatible with the current NPPF guidance and the AP provides a policy along the lines recommended in it which makes plain the FoDDC's positive attitude to sustainable development and sets out how it will be considered.

1.3 Where there are numerical figures in policies, these will need to be reviewed on a regular basis and this is no more true than in the case of housing provision, now referred to in the guidance as need. LPAs are required to establish a figure, OAN (Objectively Assessed Need) from which to derive a plan figure for housing provision. In the case of the FoD the OAN figure is that which the AP seeks to provide for. The OAN should be a policy neutral figure for the district based on the demographic requirements and any other factors such as the local market, the need for additional housing to support job growth and the need to provide for additional affordable housing if it is likely to be able to be provided.

1.4 The review for the FoD began in 2014 and has been informed since that date by material which has taken account of the latest household projections and the most up to date information about the economy and the need for affordable housing. Its main evidence is a paper prepared in 2014 and now supplemented by a further review of the economic forecasts and an update for the OAN itself (to be published July 2015) .

2 . Objectively Assessed Need

2 Objectively Assessed Need

2.1 The NPPF requires LPAs to assess on a regular basis the housing needs of their area, and to keep the assessments up to date. The assessment should produce the so called OAN (Objectively Assessed Need) and it is this which any plan should seek to provide for or provide reasons and justification why it cannot. The adopted FoDDC CS was prepared before the NPPF was published in its final form and uses a different method of assessing the requirement for housing. It was based on the demographics of the time and the level of provision was in tune with the then latest forecasts. The proposed level of provision was supported by the Inspector who conducted the Examination. Although the CS provision was in tune with the needs of the district, it was not based on an assessment using the now recommended, (but not mandatory) method of assessment.

2.2 In order to support the AP a new assessment of need has been completed, and was used to inform the Publication version of the AP in March 2015. The figures in the CS have in effect been replaced though the strategy and spatial distribution it advocates remains. The level of plan provision does not need to equal the OAN, providing there is suitable evidence to show why the Plan should not meet it. OAN is simply the “housing that households are willing to buy or to rent either from their own resources or with assistance from the state” PAS guidance 9.1. The definition is as stated the total housing that would be provided if land supply was not constrained (or relaxed) by planning policy.

Assessment of Need

Notes: The term “need” is used in the context in which it appears in the government guidance and refers to the overall requirement for housing as assessed by the LPA in an objective manner.

See full report (evidence paper) “The objectively assessed housing needs of Stroud Forest of Dean and Cotswold, NMSS, 2014” for full explanation of the background to how this paper considers OAN and also supplementary evidence (July 2015 update). This has been revised in the light of more up to date household projections and supplemented by supporting material which considers particular aspects of the local economy and its future. This material and any relevant supplementary information will be available for the plan’s examination.

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2.3 The NPPF requirement is to regularly consider the housing needs in the district and to provide an up to date assessment. This is considered below. Although the current assessment considers the period 2014-31 it is applied here to a Plan which has 2026 as its end date. It will in any event be subject to review before 2026. Need is assessed in terms of a relatively long period (the Plan period) or the twenty year period to 2031. The provision in the AP is intended to meet this. The same assessments are used to derive the shorter term requirements for housing, the so called five year requirement against which the availability of sites is assessed for the purpose of ensuring there is an adequate supply of land.

2.4 At the point at which the assessment is made the needs of the area are all considered and any unmet need from a previous period is taken into account simply because the material from ONS and other information assesses what is required. Any under provision will be included in the future projections because households that require housing at the point of assessment will be recorded as that in the new assessment. Older plan targets are superseded by the new and as found in the following there is no reason for past need to be added to that which is being assessed, that would be double counting”

“In assessing future need, authorities should not add any ‘backlog’, where past housing development under-delivered RSS targets. Thus a recent High Court judgement noted:

‘... There was no methodological error in the way these competing estimates for the period 2011-2031 were drawn up by reason of the notional “shortfall” in housing delivery between 2006 and 2011 by comparison with the average annual figure for additional housing indicated in the South East Plan... There was no reason whatever for a person in 2011 seeking to draw up a current estimate of population growth and housing requirements looking into the future from that date to 2031 and using up-to-date evidence to do so, to add on to the estimated figures any shortfall against what had been estimated to be needed in the first phase of the previously modelled period included in the South East Plan..’

(Zurich Assurance Limited v Winchester City Council and South Downs National Park Authority, [2014] EWHC 758 (Admin) 18th March 2014) quoted in OAN October 2014 paper”

2.5 In order to derive the OAN, the starting point is the ONS projections. These should then be considered and if necessary adjusted to allow for any likely variations such as may be needed to ensure that they take into account a realistic allowance for household formation following its suppression during the recession. The resulting figure is sometimes referred to as the demographic OAN. In the case of the FoD it was in the original paper (October 2014) 320pa for the period 2011-31. Following an examination of the other factors that need to be considered in OAN and which may increase the requirement, it is concluded that for the AP for adoption and with

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regard to its 2011-26 period, this figure is appropriate for the OAN. It is further concluded that this (ie the full assessed OAN) should be provided for. This figure has been considered in the light of the latest (February 2015) ONS material and the need for adjustments has been reviewed.

2.6 In preparing an OAN, the “demographic” figure is in effect tested against other factors which could require its amendment. These have been examined in detail in October 2014 and have been reconsidered in July 2015. As a result the OAN figure recommended is 310pa but it is also recommended that the Plan is able to provide some flexibility and can show it can provide for a figure of 340pa, as a means of ensuring it can meet the possible demands for additional housing to provide for job growth. This is considered in greater detail in the evidence papers, and is discussed below, but the proposed OAN is being taken as 320pa which automatically provides one third of the in- built flexibility.

2.7 The conclusion on OAN is reached in the light of several alternative propositions which have been drafted and submitted as part of the AP representations and by considering in detail the characteristics of the area as well as the latest employment statistics and population projections. The process is in accord with the guidance in the NPPF and NPPG.

2.8 The starting point for the assessment of need for OAN is to define the area for which the relevant housing market exists and to consider its needs as a whole. For the FoD the HMA is the whole of the county (Gloucestershire) and although not perfect it is recognised to be a reasonable approximation for the HMA. This is the area for which the overall needs have been assessed and for which there is a common SHMA, and compatible evidence for the establishment of the OAN. Although the original definition of the basic HMA dates back to about 2002/3, the fundamental characteristics have not changed and it is still considered appropriate. Within the area there have been a large number of collaborative assessments and today’s most up to date cover gypsies, travellers and showpeople, housing overall (SHMA) and future needs (the compatible OAN evidence). Other plans are at an advanced stage and cover Stroud and the three JCS authorities, Tewkesbury, Cheltenham and Gloucester. The emerging plans share a common evidence base for some key subjects and are compatible with one another, meeting the needs identified within their own areas. Plans covering neighbouring authorities which are not in Gloucestershire (Herefordshire, Monmouth, South Gloucestershire, Malvern Hills) are generally at an advanced stage or have been adopted and do not require any of their housing needs to be met by the FoD.

2.9 The evidence which supports the FoD AP is compatible with the other geographical areas and provides an appropriate overview and also a disaggregated district by district commentary or one which is compatible with the plan areas (eg the JCS) where districts are combined.

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2.10 Much of the evidence is contained in papers “The objectively Assessed Housing Needs of Stroud, Forest of Dean and Cotswold”, October 2014, and subsequent documents. Reference may also be required to the 2014 SHMA and subsequent documents and to the ONS material.

2.11 The household forecasts start with population projections, derive household numbers from these and then household spaces (taking account of vacancy rates and second homes etc). Before the requirements are finalised however there is a need to consider if there are any basic adjustments required due to particular economic conditions or other “special” factors. These have now been considered with reference to the latest 2012 ONS figures, and revised figures have been derived for the housing required as a result of population change.

2.12 One important qualification of the basic ONS forecasts is in respect of the need to make assumptions about the future rate of the formation of all new households. This is depressed during times of economic uncertainty and/ or rising house prices. It will have been lower than normally expected during the recent recession and therefore the recent ONS projections will be affected. The 25- 34 year age group is where the reduced levels of the new household formation are particularly apparent and where allowance needs to be made as demonstrated in the NMSS material. The allowance made in the evidence paper assumes a “partial return to trends”, and it assumes therefore that new household formation does not fully return to previously forecast trends (which assumed a much higher rate than was ever realised). The table below illustrates the assumptions made and the impact on the identified requirement. The recommended provision of 310pa is highlighted.

2.13 The suggested figures for the period 2011-31 for the FoD using various assumptions (taking empty and second homes into account) are as follows:

2.14 The suggested figures for the period 2011-31 for the FoD using various assumptions (taking empty and second homes into account) are as follows:

Table 1. Possible Demographic OAN figures

DCLG	Forest of Dean total new homes	Implied annual rate
1 DCLG 2008	7000	350
2 DCLG 2011, 25-34 PRT +2012SNPP +10yr	6400	320
3 DCLG 2012	5300	270

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DCLG	Forest of Dean total new homes	Implied annual rate
DCLG 2012 +10yr	6200	310
DCLG 2012+ 10 yr+2011 HRR floor	6300	320

See full report “The objectively assessed housing needs of Forest of Dean ” July 2015 update for full explanation of the background to this table.

2.15 Following the demographic study and recommended figure, it is now necessary to consider any adjustments as set out in the NPPF and its related guidance. The relevant policy guidance on the assessment of housing needs requires “other considerations” to be applied to the above and this includes the possible need for additional housing to cater for any projected job increase. It also includes any additions due to the present housing market being particularly constrained and any need to take account of the need for affordable housing. It is recommended in the paper and its update that there is no case for “market” additions or to provide for additional affordable housing. The figure to be met is therefore that derived from demographic analysis and from any addition required because of the projected increase in jobs over and above the housing that will be available from meeting the (adjusted) demographic need as in the highlighted row of the above.

Market constraints (see especially paras 78, 81 and 84 of the 2014 evidence paper).

2.16 The current market is considered to be able to support a reasonable level of house building and is not felt to be unduly constrained by the lack of sites. Undersupply is not therefore considered a problem, and neither is overcrowding or the number of concealed households. All these are discussed in the October 2014 paper and no case is found for any addition to the proposed OAN. If anything some of the sites that are available are not coming forward because those available can at present more than cover the market demand. The trends in prices do not suggest under supply and the availability of housing on a variety of sites has not appeared to be constrained. It is rather the case that on some sites demand has been relatively slow and once commenced they have been built at a slower rate than envisaged. The relatively slow demand and the lack of evidence that prices are being held up by a shortage of housing may have an impact on the viability of some sites but this is considered when the range of sites on offer is reviewed not the number of dwellings that they should cater for. All of the allocated sites proposed in the AP have been reviewed and only those that are considered to have a realistic prospect of being developed during the plan period are proposed to be allocated.

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Affordable housing (paras 85-88 of the 2014 evidence paper).

2.17 The NPPG guidance on the way in which affordable housing need should be considered states:

*“The total affordable housing need should then be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, given the probable percentage of affordable housing to be delivered by market housing led developments. An increase in the total housing figures included in the local plan should be considered where it could help deliver the required number of affordable homes.”*¹⁶ 029 Reference ID: 2a-029-20140306

2.18 Although this appears to mix the theoretical (OAN) with the practical consideration of what could be provided, it provides a realistic basis for the assessment of affordable housing provision. It is further reinforced by the PAS technical note which supports this approach when it refers to the need for a judgement to be made:

*“.....on how much affordable housing can be realistically paid for. The planned quantity of affordable housing must be consistent with the developer contributions that can be viably delivered by the planned quantity of market housing. If that affordable housing number is too high, then the land intended for affordable provision will either remain vacant or be developed for market housing.”*¹⁷ Objectively Assessed Need and Housing Targets: Technical advice note, Planning Advisory Service, Paragraph 7.4

2.19 It is therefore apparent that the OAN should only add additional affordable housing requirements (need) when it can be met . The ONS projection of demographic need as adjusted considers all types of household formation and that will include those that can only be accommodated in affordable housing. It is based on past trends so any change in the way in which affordable housing is provided would not be reflected, it is however considered unlikely that there will be such changes. The main current method by which affordable housing is delivered is through market housing providing a subsidy. This is provided in the form of a share of certain “eligible” sites being required to provide up to 40% of their housing total in the form of affordable housing. This figure is subject to negotiation based on the viability of individual sites and with current evidence in the form of negotiated shares being lower than 40% and past and current applications to reduce this it appears unlikely that there will be a major increase in provision from this source. The capability of the market to support the 40% level of provision seems marginal.

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2.20 Until recently, eligible sites for affordable housing could include those of 6 dwellings or more in rural areas. This is not now the case with the threshold being raised to 10 in most circumstances and delivery is likely to be further reduced by this change.

2.21 This leads to the conclusion that affordable housing can be assumed to be delivered at something below 40% on sites of more than 10. The rate is likely to be capped by the market's capacity to deliver (market housing). In order to change this, a material increase in government or other subsidy would be necessary. Although in the past there have been major subsidies it is apparent that these will be more constrained in the future.

2.22 In addition to the shared schemes provided by the market, some affordable housing is delivered by providers' building schemes that are just for affordable dwellings. These can be in the form of small developments in rural locations where new housing would not normally be permitted and on other land. These sources though important are relatively small and in any event deliver against the type of need assessment that will have been taken into account in the demographic household formation projections.

2.23 The need for affordable housing can be assessed in a variety of ways and there is support from the current SHMA for the existence of a large number of persons who are in need in the FoD. This is unfortunately a common situation across many districts. There is according to the SHMA a backlog of need and also a large future need. Only the net new households required can be considered in OAN. To add a further figure to the OAN would not be achievable, in part because the market is not considered likely to support the raised levels of housing provision needed to significantly increase the affordable housing provided as developer contributions. An addition to the OAN for additional affordable housing that is likely to be able to be delivered is not therefore considered appropriate.

Economic projections

2.24 The most complex additional factor that may result in an adjusted OAN is that of economic projections and how to take account of them. It is necessary to consider whether the housing likely to be needed as a result of the demographic forecasts above will need to be supplemented by additional units because of a demand arising from projected levels of economic growth. The issue is whether or not provision already made and implied in the demographic figures will be sufficient, including as it does assessments which relate to economic activity (for example regarding movement of people of working age). It is a complex issue involving economic activity rates, assumptions about working age, and most significantly future projections of the numbers of employees required and the numbers of households will be required to support the projected workforce.

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2.25 The NPPG refers to the above issues and especially asks LAs to consider the possibility that the supply of (dwellings) for the working age population likely to be required will not be sufficient if sticking simply to demographic forecasts. It advises that the lack of sufficient dwellings in a given area could result in “unsustainable commuting patterns” and reduce the resilience of businesses.

2.26 The 2014 evidence paper considers recent economic projections that were commissioned from two different sources in order to inform the OAN process and looks at the resulting implications for housing needs. It considers the period 2011-31, which takes the projections five years beyond the present FoD plan period. It covers Stroud, Cotswold and the Forest of Dean and is compatible with work covering the Joint Core Strategy area (Tewkesbury, Gloucester City and Cheltenham). The information which informs it is drawn from the best available sources which is often from county wide information. Looking at a larger area will reduce the possible variation which smaller areas may be susceptible to, though as a trade-off it may not reflect local variations that occur.

2.27 In order to avoid the uncertainties from the period immediately following the recent recession, the period 2014-31 is that which is being considered. If the period 2011-14 is included then the projections from different sources are very different. The variation is one consequence of uncertainties in the underlying data.

2.28 Even with the change in dates as above to give them more potential for stability, the economic projections vary widely. Whilst these projections may prove more accurate when considered over a larger geographical area, it is the FoD for which the OAN needs to be derived and this needs to take account of the impact of economic factors particular to the district and be representative of the likely additional need for housing (if any) arising from the economic growth projections. Some of the data supporting the projections applies to the whole southwest and although it is the most suitable and available, small parts of the area (FoD for example) to which it relates may not show the same characteristics as the whole.

2.29 Over the county as a whole, there is no additional need for housing to cater for job growth if a simple average of the projections is taken. One 2014 projection (OE) would not require any additional housing for the projected job growth in the FoD (-300) while the other (CE) requires an additional 1900. This underlines the need to look more closely at the figures in order to best assess any necessary adjustment to the emerging OAN.

2.30 It is not appropriate to make any allowance in OAN for changes to commuting patterns. These are able to be allowed for in the plan but not in the forecast of housing need (the OAN itself). Although the CS contains policies intended to influence this balance and provide a better range of employment as well as new housing within the district, no numerical allowance for a change in commuting patterns is made. This approach accords with the NPPF and its companion guidance.

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2.31 The assumed changes in jobs are split into sectors for the projections. One of these is “government services”. CE sees a growth of 1500 jobs (2014 to 2031) and OE 500. The former figure of 1500 represents about 66% of the total projected increase of jobs between 2011 and 2031. Another notable difference relates to the extent of any growth in financial and business services where the number of jobs is forecast to rise by 303 (CE) or 936 (OE). Another noticeable difference in a large sector is the difference between the two forecaster’s assumptions about the rate of decline expected in the manufacturing sector. Given these variations which arise from entirely reputable projections one approach would be to adopt a flexible approach in the Plan. Another more rigorous approach would be to further analyse the figures and look at other evidence that can test the two forecasts and if necessary provide a modified figure for the OAN.

2.32 Additional uncertainty in the forecasts stems from the way in which both arrive at similar forecasts for total job change over the period 2011-31 but very different additional household requirements. They have contrasting views as to the number of jobs which existed in 2011, and this and the assumed numbers of jobs created between 2011 and 2014 has a very significant impact on the projections for the need for additional housing for the remainder of the plan period.

2.33 Following a review of the projections against additional evidence now available, and further analysis, the conclusion is reached that the actual number of additional homes likely to be required over the period 2011-31 due to the housing requirements of the workforce is between -800 and +800. This range takes account of two particular anomalies, the very high apparent level of public sector job growth forecast by CE and the growth in financial and business services forecast by OE. A detailed examination of the forecasts suggests that the rates of change implied are unlikely in the FoD.

2.34 One approach recently taken by an Inspector at Stroud (Local Plan Inquiry) was to plan for a figure which averaged two forecasts. This approach is proposed in the case of the FoD. The OAN figure would therefore be 310pa, by application of the average (0) between the two adjusted forecasts of +800 and -800.

2.35 Although the OAN is recommended to equate to 310 dpa, there is a case for being able to accommodate some flexibility, due to the inherent uncertainty of the forecasts. Returning to the unadjusted forecasts (which are not adjusted for what appear to be high and unrealistic growth assumptions in certain sectors) the suggested mid point of the two forecasts is +600, suggesting a possible need for an additional 600 dwellings. This implies a 20 year rate of 340pa. Although not suggested as an OAN figure, it would be prudent to be able to plan for the range of 310-340 rather than simply the lower end. The capability of meeting this figure would allow some growth over the demographic forecast in the event that the economy required it.

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2.36 The Council's response to the previous paper was to adopt an OAN of 320pa for the AP, and although this is slightly ahead of the now suggested figure of 310 it is to be retained, providing one third of the suggested upward flexibility. The plan contains additional flexibility and thereby is able to meet the requirement of providing dwellings at the rate of 340pa should it be required. The calculation that demonstrates this, (see section Availability During the Plan Period, below, para 55) is not the same as that used to show a five year land supply supporting this level of housing, but that too can be met.

2.37 The figure which forms the basis of the current plan with a life of 11 years will be reviewed during that period. It is considered appropriate that the plan meets the full OAN as assessed and this will be done with largely through the allocation of sites as discussed below.

3 . Plan Provision

3 Plan Provision

3.1 Although there is provision in the NPPF for a LPA to provide for less than the objectively assessed needs of its area, if this occurs it is then a requirement to demonstrate how the unmet need will be provided for. In the FoD the intention is to provide for the needs of the area as they have been assessed. As neighbouring LAs are seeking to provide for their needs, it is the needs of the FoD alone that need to be provided for within the FoD.

3.2 The level of provision proposed in the CS was about 6200 dwellings over 20 years or 310 per year. The CS indicated how these were to be provided for and this indication included an apportionment over the district. This in turn required housing sites to be allocated to supplement those allocations already in the saved elements of the 2005 Local Plan. New allocations are proposed in the emerging AP in keeping with the identified needs and in accord with the strategy of the CS including some at the major and group villages as well as at the towns. In addition some sites with planning permission not originally from the old LP have been identified and allocated and the AP as published and submitted and the AP of course identifies land sufficient for its entire period. The identified sites are part of the overall strategy that envisages most change (80% or so) at the towns, and the remainder in other locations. Should the numerical needs vary then the expectation would be that the spatial strategy would remain with any additional provision being made in accord with that strategy. In other words any additional allocations should be made first at the towns then the major villages, in keeping with the CS.

3.3 The CS is an already adopted part of the development plan and the saved 2005 LP elements that have been in place with the CS are to be replaced by the AP along with those elements of the CS that are replaced by the new OAN and consequent housing provision. The only part of the district that is not subject to review is the CNQAAP area which is covered by both a strategic (CS) and a detailed development plan (The AAP). The AP which identifies land does so in a manner that both retains the strategy and ensures that there is sufficient land for housebuilding.

3.4 In addition to the overall provision throughout the plan period a five year land supply must be maintained. This is an assessed figure by which land equivalent to the need for land for housebuilding for the next five years can be provided along with an additional allowance to provide a buffer to ensure sufficient sites can be delivered. In addition further capacity is required to ensure that any under provision (measured against the plan target) can be made up. The NPPF prescribes an approach to the calculation of and retention of a five year supply of land for housing. In areas like the Forest of Dean where completions have lagged behind the averaged required rate over the relevant plan period, it sets out the need to provide sufficient land to provide land for 20% more than the basic requirement. This enhanced rate of provision must be supplemented by a means to make up any backlog from within the plan period which exists at the time of assessment. In broad terms this takes

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the required land supply from the five year expected build of 1600 (at the 320pa) to the need to provide for 1990 (320×1.2)⁵+70 dwellings by adding first 20% and then 70 (the so called backlog). This raises the equivalent annual figure from 320 to 398. The 20% buffer reflects the level of past completions not providing the number of dwellings required by the Plan. Where the level of completion meets the plan requirement, the 20% figure is replaced by one of 5%, and the total requirement for a five year land supply would fall. This would reflect both the change from a 20% to 5% buffer but also the lower (non-existent or very small) backlog. If this situation arose in the FoD the requirement would be $(320 \times 1.05)^5$ or 1680, equivalent to provision for 336 dwellings per year with no backlog. Although the backlog and buffer referred to in the NPPF are intended for the assessment of a five year supply, it is considered appropriate to allocate sufficient land for some flexibility in the AP in order to ensure that the plan enables sufficient land to provide for the assessed need.

3.5 The majority of the land that will meet this requirement will be sites first identified in the AP or another Plan (2005 LP, Cinderford NQ AAP). A further contribution will be made by sites that currently have permission or may be regarded as commitments but which have not been allocated in any Plan. The balance will be met by the completion of small sites (less than 6 dwellings), or by an allowance for currently unidentified sites that will gain permission and contribute during the five year period.

3.6 In order to provide the greatest degree of certainty of supply, the Plan should seek to allocate sufficient land to provide for a high percentage of the total requirement, taking into account the number of dwellings likely to be provided on small non-allocated sites. The overall level of provision in the AP is intended to ensure both a five year supply and an adequate supply able to meet the likely need over the whole plan period (to 2026). As a result some of the sites allocated (including some which have now received planning permission) will be unlikely to be completed within the first five or even ten years. They are all considered deliverable over the plan period.

3.7 The actual figure required to meet the five year supply will change according to the completions that are achieved as well as by responding, if necessary, to reviews of the need which will take place during the plan period. Firstly when the annual delivery meets or exceeds the plan requirement when averaged over a period of, say, five years, there will be a reduction in the “buffer” from 20% to 5%. Secondly the numerical “backlog” will vary year on year and may disappear altogether. The plan requirement is fixed for a period but is reviewed regularly and the plan period will itself be extended to 2031 probably as part of the next review.

3.8 The basis of the current provision is an evidence base that looks at the trends and considers the period 2011-31. It is however possible to apply the study to the shorter plan period being mindful of any likely variations. This is the current situation for the AP where the OAN taken as 6200 is derived for the period 2011-31. The annual rate of development implied by this is 320pa. Over the plan period to 2026, (from the start of 2015/16) which is 11 years, provision for 3520 dwellings is needed.

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3.9 The AP as written contains a degree of flexibility by way of its allocations. The OAN adopted is in excess of the basic recommended figure. In addition the allocations made mean that this figure is able to be exceeded. None of the allocated sites are subject to phasing by the Plan although they are able to be regulated by individual planning permissions. This again results in a degree of flexibility.

3.10 Given the way in which the requirement to maintain a five year land supply applies additional buffers and adjustments to the required supply, the draft AP will, in catering for this and the identified housing requirement over the whole Plan Period, incorporate a degree of flexibility. The way it will be reviewed prior to its end date means that should the need arise, additional land can be allocated in sufficient time to come forward and contribute.

3.11 The AP as prepared together with the current sites with consent for 6 or more dwellings is capable of delivering about 3612 additional dwellings. These are not all likely to be available over the first five years of the plan. On the largest site (east of Lydney), there are likely to be limits as to the rate at which development that can take place even though the site is such that a number of outlets can be available at the same time. In addition to the additional capacity above, there are some mixed sites that are allocated for a variety of development and which are expected to deliver a number of dwellings during the plan period.

3.12 There are signs that the housing market in the FoD is slow, and although there is a big range of sites considered available, take up is relatively modest, and since 2006 completions have averaged about 12% below the previous plan figure of 310pa. Even when the recession is accounted for it appears unlikely that a figure substantially above the present CS' 310 could be met by the market. The likelihood is that at least 25% of the total will continue to be made up from smaller sites (up to and including 5 dwellings net increase), leaving about 245 (75%) of the total to be met on larger sites which will be mainly managed sites involving local or national housebuilders.

3.13 Should there be a change in the observed trends in the number of new jobs being created in the district, for example, the housing provision could be revised if the present flexibility appears insufficient. It is also important to note that the plan as presently written runs to 2026, and the OAN evidence looks to 2031, and it is considered in the accompanying evidence (para 136 Oct 2014 paper) that additional need arising from growth in employment may occur in the latter part of the period. Consequently there is flexibility in the AP sufficient to not constrain the availability of land for housing and the certainty of review which could take account of any change in circumstances. The plan does not cover the period about which there is most uncertainty (2026-31) and for which revised provision can be most easily made if needed.

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3.14 The CS settlement hierarchy and planned distribution of housing was set out before the latest assessment of housing needs. The re-assessment in 2014 led to an update of the CS which sees provision at the rate of 320pa for the period 2011-26. As this is very close to the levels planned in the CS the settlement policies in the CS can still apply and where the AP refers to the way in which it can meet the CS requirements it is also meeting the updated housing requirements as assessed by the Council. The CS as adopted made clear the need for additional housing allocations to be made, especially in some of the major villages where there were no sites allocated. The published AP makes allocations in these locations and others sufficient to ensure that the level of housing provision matches the assessed needs.

3.15 The current position in the draft Allocations Plan is summarised below. The figures used are for the period 2011-26 although the evidence base considers the period to 2031. The assessment replaces any previous considerations and looks at the current requirements afresh. It takes account of needs as they currently exist, and in establishing the future provision required uses the completions 2011-14, retains the 20% buffer and adds the so called backlog from 2011-14. The five year requirement is 1990 and the available supply on 1-4-2015 was assessed in the range from 2227 to 2415, giving a supply of between 5.6 and 6.07 years. The table below represents the current situation in respect of the five year supply and shows the current remaining capacity of the sites concerned together with the percentage expected to be developed at the end of the five year period.

Table 2 Current Situation in respect of 5 year land supply

Site name			Percentage developed after five years (baseline)		Remaining after five years	
Allocated sites in adopted plan	Five year available	Capacity remaining now (2015)	Percentage developed after five years (baseline)	Remaining after five years		
1	Blakeney former goods stn o/l 2009	Under construction and almost complete April 2015 all expected 2015/16. Total capacity 17.	17	17	100	0
2	Bream (Woodside)	Detailed permission for 9 as part of a larger allocated site. This scheme could be constructed as permitted and is regarded as available. Owner (builder) reply (2015) site is available to be completed within five years.	9	9	100	0
3	Cinderford Northern quarter, HCA	Site considered in two parts, This, HCA element of the site has permission in outline for up to 195 dwellings served by a road which	50	195	26	145

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	Site name					
	Allocated sites in adopted plan		Five year available	Capacity remaining now (2015)	Percentage developed after five years (baseline)	Remaining after five years
		has detailed consent and is expected to be commenced in late 2015. HCA in 2015 estimate site capable of 100-120 dwellings within five years. The site is publicly owned.				
4	Cinderford NQ Newtown Rd	Accessible from existing highway with current applications for total of 50+	30	40	75	10
5	Cinderford Railway Tavern Station Street 10	Counted as available following appeal decision which accepted it could be developed without change to the adjoining employment site which was at the time of the appeal in full use. Current permission is a renewal. Adjoining premises are substantially vacant and are identified for housing development. They are considered available for this purpose by the owner who was also the main occupier.	10	10	100	0
6	Cinderford St Whites Farm	Undeveloped part of site covered by existing permissions. Land is accessed from earlier phase of development by Bloor Homes who have now ceased building. However reply for 2015 from Bloor identified site as available and able to be completed inside five years. Total site capacity 174	55	55	100	0
7	Cinderford Station St former Listers (Rothdean)	2015 reply from agent on behalf of owner- the site is considered available and able to be developed within five years- subject to sale or finding a developer. Two adjoining sites (this one and former Cannop Foundry) are in same ownership. Site contains buildings- largely	0	100	0	0

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Site name	Allocated sites in adopted plan	Five year available	Capacity remaining now (2015)	Percentage developed after five years (baseline)	Remaining after five years
8	Cinderford Station St Cannop Foundry	20	30	67	10
9	Cinderford Station St Turley Ct and Wilce land	11	21	52	10
10	Cinderford Valley Rd S (inc Abattoir)	33	33	100	0
11	Coleford Owen Farm	148	148	100	0
12	Coleford Poolway Farm	80	80	100	0
13	Longhope Rectory Meadow	0	13	0	13

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	Site name					
	Allocated sites in adopted plan		Five year available	Capacity remaining now (2015)	Percentage developed after five years (baseline)	Remaining after five years
14	Lydney East Liddington land	No planning history not included in five year supply, this site is accessed from another phase of the Lydney east Allocation (MMC below).	0	90	0	90
15	Lydney East MMC (not Emp land site)	Discussions with developer ongoing, estimate from owner/ developer in 2015 is 252 dwellings completed by 31 st Mar 2020. Current application for renewal of outline permission sets out availability which takes advantage of adjoining site (originally owned by owner of this part) and which provides the necessary infrastructure connections. Owner considers start on site early 2016 and yield of 6 dwellings per month from each of 2 outlets. Capacity 390	150	390	38	240
16	Lydney East Phase A (RHL site)	Growth and infrastructure Act appeal now permits delivery at reduced level of affordable housing (reduced level of 14% until 2017). Further discussions in progress. "A" and "B" are in same control and are considered together, capacity of "A" is 323.	0	323	0	323
17	Lydney East Phase B (RHL site)	As Lydney A, affordable housing may be provided at a reduced level (appeal under G & I Act). Has planning permission for sewer to serve site following completion of pumping station and connection to existing system. Renewal of existing outline permission now resolved to be granted. Note principles of development phasing etc are agreed and approved under various approved reserved matters. Owner estimates 90 completions by 2020- Application	160	750	21	590

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Site name	Allocated sites in adopted plan	Five year available	Capacity remaining now (2015)	Percentage developed after five years (baseline)	Remaining after five years
18	Lydney Holms Farm	27	27	100	0
19	Mitcheldean Glos Rd	16	16	100	0
20	Newent Broad St	8	8	100	0
21	Newent Ross Rd	0	30	0	30
22	Sling Adj Miners Arms	20	20	100	0
23	Woolaston inc Netherend Dairy	29	29	100	0
	Total	873	2434	36	
	Not allocated in old LP with PP,				
24	Cinderford 3 commercial St 2481	7	7	100	0

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	Site name		Five year available	Capacity remaining now (2015)	Percentage developed after five years (baseline)	Remaining after five years
	Allocated sites in adopted plan					
25	Cinderford 52 Ruspidge Rd	2014 agent reply site is available and deliverable- sale expected inside 12 months capacity 8	8	8	100	0
26	Cinderford 97 St Whites Rd Cinderford Bridge	Legally commenced, capacity 8	0	8	0	8
27	Cinderford St Johns Parish Hall 2217	4 under construction capacity remaining 4	4	4	100	0
28	Cinderford St Whites Rd Peacock Lane Ruspidge	Site under construction remaining capacity 13, total 20+	13	13	100	0
29	Coleford 27-41 Coalway Rd	Under construction capacity 41	37	37	100	0
30	Coleford Dukes travel Berry Hill	Res matters submitted, has a valid outline pp capacity 7	7	7	100	0
31	Coleford Kings Meade	Commenced by groundworks, 2015 reply from owner (builder) who expected to commence building work mid 2015 and complete the 14 units by the end of 2016, now u/c. (foundations).	14	14	100	0
32	Coleford Newland St former WCs	foundations in place- agent considers site available and can be completed by 2020 capacity 7	7	7	100	0
33	Coleford Sunnybank Hse	Site under construction capacity 6	6	6	100	0
34	Corse Grange Corse	Revised consent capacity 7	7	7	100	0
35	Drybrook Dairy Farm	2014 agent reply available and deliverable shortly to be sold capacity 17	17	17	100	0
36	Dymock Western Way	Work well advanced capacity 20	20	20	100	0

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Site name	Allocated sites in adopted plan	Five year available	Capacity remaining now (2015)	Percentage developed after five years (baseline)	Remaining after five years	
37	Lydbrook Central Eng works	2014 owner reply available and capable of delivery- now lapsed capacity 11	0	11	0	0
38	Lydbrook Former Rothdean site	Has permission for 26 considered available by owner in 2015 (site cleared/ some preparation) capacity 26	26	26	100	0
39	Lydney Cross Hands Highfield Hill	2014 agent reply available and deliverable- capacity 21, site currently being marketed	21	21	100	0
40	Lydney Highfield Rd	Site under construction capacity 49	31	31	100	0
41	Lydney Highfield Rd rear of T & T	2014 site deliverable (information accompanying application) allocated in draft plan capacity 110	110	110	100	0
42	Newent Foley Road	Site now owned by Persimmon and 2015 return considered all available and expected to be delivered by 2020- capacity 120 reserved matters application received.	120	120	100	0
43	Tutshill Highcliff Beachley Rd Tutshill a	Agent reply, 2015 available and deliverable capacity 7	7	7	100	0
44	New Rd Bream	New permission 2014 capacity 14	14	14	100	0
45	Newent Southend lane	New permission 2014, agent considers available and can be completed by 2020 capacity 24	24	24	100	0
	Total non allocated sites		500	519	100	
New sites in AP						
46	Cinderford Football Club	Discussions with developer underway, revised total included in Publication draft but no contribution assumed in baseline figure- capacity 80	0	80	0	80

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	Site name		Five year available	Capacity remaining now (2015)	Percentage developed after five years (baseline)	Remaining after five years
	Allocated sites in adopted plan					
47	Lydbrook Stowfield	Discussions with developer underway capacity 45	0	45		45
48	Mitcheldean Former coach depot	Considered available no pp. Site is within existing and proposed settlement boundaries, is vacant and is a previously developed site. It is considered available, and is free of known constraint capacity 12	12	12	100	0
49	Netherend Ash Way	Allocation in AP, supported by owner when identified capacity 12	12	12	100	0
50	Newent Watery Lane	Valid outline consent and subject of pre application consultations for reserved matters - capacity 30	30	30	100	0
51	Tutshill/ Sed Adj Wyedean School	Discussions in progress with agent for developer who considers the site available for 110 dwellings in five years- reserved matters application due before Oct 2015, following outline consent granted in 2014. Pre application discussions under way. Capacity 110	110	110	100	0
52	Bream additional land at Ryelands Rd/ Highbury	Assumed within five years, land contiguous with site 2, but owned by FoDDC. Capacity 5	5	5	100	0
53	Bream off New rd/ High Street	Considered available in 2015 reply from owners agent-permission for 9 dwellings granted July 2015. Capacity 15 but may provide 9	9	15	60	6
54	Cinderford Valley Road	2014 part of new allocation supported by owner as available, 2015 update from owner's agent-planning application being prepared site considered available within five years. capacity 45	15	45	33	30
55	Coleford Kings Head	New allocation capacity 12	12	12	100	0

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	Site name					
	Allocated sites in adopted plan		Five year available	Capacity remaining now (2015)	Percentage developed after five years (baseline)	Remaining after five years
56	Coleford Lawnstone Hse	New allocation FoDDC owned- demolition planned in 2015 capacity 8	8	8	100	0
57	Drybrook	New 20 completions assumed in five year period, supported and considered available by owner capacity 50	20	50	40	30
58	Lydney Hill Street	New allocation previous main occupant now vacated- agent considers will be completed by 2020- constraints due to adjoining ownerships. May use existing vehicle access subject to highway approval. Capacity 25	10	25	40	15
59	Mitcheldean former George Hotel	New allocation property vacant subject of current application for determination (31 units) July 14th now resolved to be granted capacity 31	31	31	100	0
60	Mitcheldean new site	No contribution assumed within five years allocation now within Vantage Point- owners agent considers site capable of some delivery before 2020. Capacity 40	0	40	0	40
61	Netherend Farm additional land	Addition proposed by owner in 2014 in order to improve viability of previously granted permission. Application now being prepared for 36 in total on this site and 23 above. Capacity 7	7	7	100	0
62	Newent Cleeve Mill E Care	Owned by prospective developer has had permission- subject to current discussions and owner considers can be completed by 2020. Capacity 40	40	40	100	0
63	Newnham	New allocation supported by owner/developer- at early pre application discussion stage. Capacity 40	40	40	100	0

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Site name	Allocated sites in adopted plan	Five year available	Capacity remaining now (2015)	Percentage developed after five years (baseline)	Remaining after five years	
64	Newnham former Victoria Hotel	Vacant property- new allocation supported by owner and considered able to provide dwellings within five years. capacity 20	20	20	100	0
65	Sedbury Tutshill A48 a	New proposed allocation supported by owner, 2015 agent reply planning application now being prepared considered available. At pre application stage. Capacity 35	35	35	100	0
66	Staunton Corse A 417	New allocation to AP capacity 20.	20	20	100	0
		New proposed allocations in AP	436	682		
	Total identified large sites		1809	3635		1715
	Small sites at 74pa		370	814		444
	Large windfall	81pa but discounted until yr8	48	483		435
	TOTAL		2227	4932		2594
	Years Supply at 20% buffer	eg (320*5)*1.2+70= 1990, 2415/1990= 6.07	5.60			
	requirement for 20% and 70 backlog		1990			
	Years supply at 5% buffer	eg (320*5)*1.05+70= 1750, 2415/1750= 6.83	6.36			
	Tequirement for 5% and 70 backlog		1750			
	Numerical under or over 20%		237			

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Table 3 Supply Summary

SUMMARY	low	high
Annual plan requirement	320	320
Backlog	70	70
Years supply	5.6	6.07
Completions to date	1210	1210
Five year basic reqd	1600	1600
Five year CS plus 20%	1920	1920
Five year CS plus 20% and backlog	1990	1990
Numerical supply	2227	2415

3.16 Should there be a change in the observed trends in the number of new jobs being created in the district, for example, the housing provision could be revised if the present flexibility appears insufficient. It is also important to note that the plan as presently written runs to 2026, and the OAN evidence looks to 2031, with the comment that greater needs arising from growth in employment will be in the latter part of the period. Consequently there is flexibility in the AP sufficient to not constrain the availability of land for housing and the certainty of review which could take account of any change in circumstances. The plan does not cover the period about which there is most uncertainty (2026-31) and for which revised provision can be most easily made if needed.

3.17 The CS settlement hierarchy and planned distribution of housing was set out before the latest assessment of housing needs. The re-assessment in 2014 led to an update of the CS which sees provision at the rate of 320pa for the period 2011-26. As this is very close to the levels planned in the CS the settlement policies in the CS still apply and where the AP refers to the way in which it can meet the CS requirements it is also meeting the updated housing requirements as assessed by the Council. The CS as adopted made clear the need for additional housing allocations to be made, especially in some of the major villages where there were no sites allocated. The published AP makes allocations in these locations and others sufficient to ensure that the level of housing provision matches the assessed needs.

3.18 As drafted the AP identifies sites in the form of allocations for about 3061 new dwellings. In addition it contains policies that could enable a further 200 dwellings to be provided on sites allocated for mixed development. As well as these the plan will continue to support the development of small unidentified sites and, at the current rate, the contribution of these is assessed at about 74pa. There still needs to be a

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windfall allowance to cover unallocated sites of over 5 dwellings simply because unforeseen sites providing greater than 5 dwellings will continue to gain consent and be developed over the plan period. These allowances and the allocations made are set out below:

1. An annual contribution of small sites, assumed to be at a rate equivalent to the completion of all dwellings under construction plus 60% of those yet to be started (74pa) is assumed. There have been 1255 completions in the past 13 years, measured to 2014/15, and an average over that period of 96pa). The contribution from this source over the remainder of the plan period is assumed to be 74×11 or 814 dwellings. These sites are those with a net capacity of five or less.
2. Larger windfall sites- a sliding scale up to 81pa is used based on the past contribution assessed from this source. The contribution within the first five years is limited to 48, rising to the full 81 only after year seven. The total for 11 years assumed 485. These sites are non- allocated sites not otherwise identified (by way of a planning permission or lapsed permission) with a net capacity of six or more.
3. Allocated sites in Allocations Plan capacity approx. 3061.
4. Sites not allocated in a plan or emerging plan but under construction or committed (current or lapsed permissions) current contribution within five years- 168 approx. This figure represents sites not allocated or proposed to be allocated but they are individually identified within table 2 and are additional to the large windfall element.
5. The estimated potential land available during Plan period is therefore as follows:

Table 4 Allocations plan provision housing supply summary

Category	Plan period expectation
Allocated sites in AP	3061
Larger unidentified sites up to 81 pa	485
Current large sites never allocated	168
Small sites @ 74pa	814
	4528
Net requirement	3590

7. Total from above 4528 approx including small sites, windfall, allocated sites and land with planning permission. Plan requires $320 \times 11 = 3520$, or 3590 including "backlog". The total provision exceeds the net requirement of 3590 by 938 or 26%.

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3.19 There are sites in the Allocations Plan allocated for mixed development that includes housing. These are not counted in the supply but are expected to contribute additional housing over the plan period. The following sites fall into this category and unless they have planning permission will not be counted against the requirement for a five year supply of land for housing. It is likely that a high proportion of them will be built during the plan period, but there is no contribution assumed from this source.

Table 5 Sites in AP part identified for housing but not counted AP supply estimates

Sites	Possible dwelling contribution (up to)
Stowfield Lydbrook, former industrial site identified for mixed uses, supported by owner as proposed to be identified- listed but no contribution within five years	45
24 High Street Cinderford- retail and mixed use allocation in town centre	10
Lydney Town Centre Hams Rd mixed use allocation retail	15
Lydney Pine End Works- mixed allocation including employment, recreation, retail, tourist accommodation and residential on harbourside location	30
Lydney railway station mixed allocation for commercial residential and other development	20
Coleford Former Court Buildings and related land, town centre mixed use site	10
Land at Berry Hill, comprehensive allocation for community related uses that may include housing	80
Newent Town centre, North of Church St, mixed development including retail and residential- some committed residential permissions but additional capacity	20
Ross Rd Newent, mixed site includes some employment uses and community buildings- adjoins line of canal to be restored- listed but no contribution within five years	40
Longhope industrial estate- mixed redevelopment proposal	10

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Sites	Possible dwelling contribution (up to)
TOTAL (Maximum potential number of dwellings)	280

3.20 The allocations plan identifies and allocates the following sites for housing:

Table 6 Allocations Plan table of sites. Development sites allocated for housing at settlements

Policy Location	Parish	Allocation	No.	Area (ha)
Land Off Ryelands Road Bream	West Dean	housing	14	0.68
New Road and High Street Bream	West Dean	housing	30	1.54
Cinderford Football Club	Cinderford	housing and open space allocation	80	2.85
(Cinderford AAP area)	(Cinderford)	(Housing allocated in AAP, not included in AP)	200	6.2
Station Street, Cinderford Housing Allocation	Cinderford	housing allocation	150	4.5
Valley Road, Cinderford	Cinderford	Adjoining allocations for housing and employment	45	1.4
Lawnstone House	Coleford	mixed development including housing	8	0.17
King's Head Public House	Coleford	conversion/ new build housing	12	0.04
Land At Poolway Farm, Coleford	Coleford	housing	80	3.2

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Policy Location	Parish	Allocation	No.	Area (ha)
Housing Allocation Off Gloucester Road	Corse	housing	20	1.1
High Street Drybrook	Drybrook	housing	50	1.8
Drybrook Farm	Drybrook	housing	17	0.6
Land off Church Road, Longhope	Longhope	housing	15	1.0
Former Tinplate Works Lower Lydbrook	Lydbrook	Housing	26	0.9
East of Lydney	Lydney	housing	1684	58.8
Holms Farm- Housing Site	Lydney	housing	27	1.9
Hill Street Lydney	Lydney	housing part of mixed allocation	25	1.1
Old Coach Depot, Mitcheldean - Housing Allocation	Mitcheldean	housing	12	0.42
Land off Bradley Court Road (Vantage Point) Mitcheldean	Mitcheldean	housing	40	1.5
Former George Hotel Mitcheldean - Housing Allocation	Mitcheldean	housing	18	0.31
Watery Lane, Newent	Newent	housing	30	1.1
Southend Lane Newent	Newent	housing	25	1.5
Foley Road, Newent	Newent	housing	120	4.6
Extra Care Accommodation, Cleeve Mill Lane	Newent	housing	40	0.75
Ross Road Newent	Newent	mixed development to include housing	30	
Land north of Newnham on Severn and adjoining Unlawwater House	Newnham	housing	40	2.1
The Victoria Hotel, Newnham on Severn and land adjoining	Newnham	housing part conversion	20	0.35
Land adjacent Wyedean School	Tidenham	housing	110	3.4

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Policy Location	Parish	Allocation	No.	Area (ha)
Land adjoining A48 and Bigstone Meadow, Tutshill	Tidenham	housing	35	2.6
Land adjoining Miners Arms, Sling - Housing Allocation	West Dean	housing	20	0.64
Whitecroft Scovill	West Dean	housing element of mixed use allocation	30	
Housing Site Ash Way	Woolaston	housing	12	0.41
Netherend Farm, Woolaston	Woolaston	housing	36	1.2
Total			3061	107.91

3.21 In the period since 2006/7 past housing completions have been recorded as follows:

Table 7 Summary of completions

Net housing Completions Forest of Dean District			
Year	2006 on		2011 on
2006/7		205	0
2007/8		405	0
2008/9		310	0
2009/10		118	0
2010/11		228	0
2011/12		265	265
2012/13		230	230
2013/14		343	343
2014/15		372	372
Total		2476	1210
Column average		275	302

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Net housing Completions Forest of Dean District		
Year	2006 on	2011 on
Most recent 5 yrs average	287	

Five year availability

3.22 The following section provides information on land availability in terms of the five year requirement. It concludes that the land supply is adequate to meet the revised five year requirement. It is further concluded therefore that the land identified in the AP as published together with the expected supply from unidentified sources, provides sufficiently for the plan period to 2026. The summary table, also above as Table 3 is as follows:

Table 8 The five year availability summary

Sites and assumptions	high	low
Total identified large sites	1990	1802
Small sites at 74pa over five years	370	370
Large windfall only in year four (16) and five (32)	48	48
TOTAL	2415	2227
Years Supply at 20% buffer eg $(320*5)*1.2+70= 1990$, $2409/1990= 6.05$	6.07	5.60
Requirement for 20% and 70 backlog	1990	1990
Years supply at 5% buffer eg $(320*5)*1.05+70= 1750$, $2408/1750= 6.83$	6.9	6.36
Requirement for 5% and 70 backlog	1750	1750

Large sites- allocations in adopted plan and in emerging AP

3.23 The greatest contributions to land supply come from sites allocated in the adopted Plan or proposed to be allocated in the emerging Allocations Plan. Only sites taken forward into the AP are included in this category, and of those most are currently allocated in the saved parts of the outgoing 2005 LP. Some of these sites

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have planning permission and would in the absence of other evidence therefore be taken to be available over the five year period. Other AP sites may have lapsed permissions or may not yet have received permissions. The sites are individually assessed in the table below. The AP allocates land for about 3061 dwellings on sites as follows.

Large Housing sites – five year availability.

3.24 Table 2 relates to the assessed availability of land for housing for the period 1st April 2015 to 31st March 2020. The assessment is made in keeping with the requirements of the NPPF in respect of the five year supply of land for housebuilding as discussed above. All of the sites allocated in the AP for housing in the table are listed in table 2 but not all are considered to be available to deliver completed dwellings within the time period. All are considered available to deliver during the plan period although it is recognised that the largest at Lydney may deliver beyond that period as it is likely that they may be developed over a period of more than ten years.

Windfall (sites of 6 or more dwellings)

3.25 In assessing the available supply, it is considered preferable to be able to look at individual sites and assess them than to make general assumptions. All potential sites of over 5 dwellings (net) are assessed individually with the exception of a small allowance made for windfall. This allowance is made in the certain knowledge that it is very likely that there will be completions within five years on sites of over 5 dwellings which are not allocated and do not at present have permission. The ability to allow for a contribution of this nature is supported in the NPPF presumably for the above reason. Clearly such an allowance needs to be justified. The extent of the supply of these sites is based on past building and the way in which they contribute is discounted to years four and five of the five year period at 20% and 40% of the maximum level based on recent assessment.

3.26 A total contribution of 48 is assumed and attributed to the fourth and fifth year of the five year period. Actual contributions from this source will vary over time but it is likely to remain as a source of dwelling completions as unforeseen opportunities are realised. Examples of sites that were originally windfalls are those that now have planning permission but have not been allocated.

Sites with Planning Permission

3.27 Sites that have planning permission should normally be regarded as available, unless there is clear evidence to the contrary, suggesting for example that the site may not be viable, as specified in the NPPF (47 and footnote). Some are of a size that means that the delivery of new dwellings is likely to be governed by the build rate that can be supported and a further consideration is the possible availability of other sites (outlets) in the vicinity, usually the same town. As a consequence some

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sites that have planning permission are not considered wholly available in the first five years. The most obvious example of these are the sites in Lydney. Although this factor has constrained the estimates of delivery, it is important to note that the constraints that are being taken into account here are to do with marketing. Should the demand change it is considered that the sites concerned could respond by increased rates of delivery. In other words the availability of these sites may exceed what the current market is considered able to support. The delivery rates are for all housing and in cases where there is an affordable element, this is taken into account in addition to the market element.

Sites not allocated in a plan

3.28 Sites without a current planning permission fall into two categories, those that are allocated in a plan or emerging plan and those that have not been allocated. Of the former in view of the advanced stage that the AP has reached it is considered appropriate to allow a contribution from sites that are allocated for the first time in the AP. Although these are supported by other evidence concerning their delivery, the AP is not yet adopted. Some of the sites that are newly allocated or were proposed to be so identified during the AP process have now received planning permission and can be regarded as available on that count alone. Others that are allocated are in locations where they would without the AP be expected to obtain planning permission for housing, by virtue of their location for example inside settlement boundaries. These sites could have been accounted for by using a higher windfall element than that used below. The second category of sites without planning permission are those where permission has lapsed, and there are some where the permission has lapsed but the site is still considered to be available in the short term. In these cases additional evidence is considered and required. Where sites are allocated in a plan then there is still evidence of a firm commitment but that also applies to other sites. Details are provided on the schedule below. It is widely accepted that the recent recession had a very clear and major impact on housebuilding nationally and the FoD experienced a very considerable downturn too. There has since been a return to a more “normal” situation reflected in the increased activity now apparent.

Small Sites (0-5 net dwellings)

3.29 The five year contribution from small sites is assumed to equate to 60% of those with permission but not started and all of those that are under construction. At the end of 2013/ 14, the consents outstanding and the sites under construction were assessed as able to provide 74 dwellings per year over the five year period. This compares with an 11 year (2002/3- 20013/14) average number of net completions of 97pa from this type of site so 74per annum may be an underestimate of the likely contribution from this source.

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Table 9 Summary of Small Site Completions

Completions on sites of 5 dwellings or fewer	
Year	Net completions in year
2002/3	108
2003/4	107
2004/5	114
2005/6	116
2006/7	114
2007/8	167
2008/9	114
2009/10	43
2010/11	43
2011/12	82
2012/13	86
2013/14	75
2014/15	86
Total	1255
13 yr av	97
Most recent 5 year average	74.4

3.30 In early July sites with a capacity of over 5 net which had neither been allocated nor had permission on March 31st but were expected to be complete by March 31st 2020 were as follows. These sites are examples of why it is necessary and realistic to include an allocation for windfall sites in calculating future dwelling supply.

Table 10 Additional recent permissions

Site	contribution	comments
The Wend Longhope	16	Affordable housing scheme permitted June 2015 for RP

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Site	contribution	comments
Parkend Rd Bream	9	Replacement dwellings with net gain of 9 for RP
Total	25	

3.31 Table 2 shows the sites that are allocated in the AP and their availability in terms of the AP period and the five year period. It also summarises the land availability from other sources so that it can be seen how the AP is adequate to meet the OAN requirements as they are now assessed. It illustrates the margin of over provision which is referred to above and amounts to over 20% corresponding to the buffer required of a LPA where the rate of housing completions has been “persistently” below the required level.

3.32 In summary, even if the sites which are available for the current five year supply are all developed, there will still remain to be developed land for about 2594 dwellings over the then remaining plan period. This is sufficient to support an annual completion figure of 435 (2611/5). The 2227 available inside five years could in theory provide 445 dwellings per year for the five year period. This rate of building may not be achieved and therefore a proportion of the sites identified as available over the current five year period will not be developed at the end of that period. What is expected however is for the rate of development to match the OAN rate of 320 per year.

3.33 Overall the allocations in the AP and the remaining capacity of large sites (3635), together with the small site contribution continuing at 74pa and the contribution expected from large sites which at present do not have permission is able to support up to about 4932 new dwellings, a figure well in excess of the requirement of 320 per year (3520). Even if the largest allocation at Lydney is not entirely completed during the period to 2026, there is likely to be a surplus over the plan period. The east of Lydney site as allocated has a total capacity of up to 1684 dwellings and is part of a new neighbourhood within which 200 have been completed. The current availability on this large site suggests 147 dwellings per year (total 441 for the five year period, but assuming no completions for the first two). This rate of development would imply 1323 completions over the plan period, leaving a residual 361.

3.34 In early July sites with a capacity of over 5 net which had neither been allocated nor had permission on March 31st but were expected to be complete by March 31st 2020 were as follows. These sites are examples of why it is necessary and realistic to include an allocation for windfall sites in calculating future dwelling supply.

3. Plan Provision

Table 10 Additional recent permissions

Site	Contribution	Comments
The Wend Longhope	16	Affordable housing scheme permitted June 2015 for RP
Parkend Road Bream	9	Replacement dwellings with net gain of 9 for RP
Total	25	

3.35 Table 2 shows the sites that are allocated in the AP and their availability in terms of the AP period and the five year period. It also summarises the land availability from other sources so that it can be seen how the AP is adequate to meet the OAN requirements as they are now assessed. It illustrates the margin of over provision which is referred to above and amounts to over 20% corresponding to the buffer required of a LPA where the rate of housing completions has been “persistently” below the required level.

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4 . Conclusion

4 Conclusion

4.1 A revised OAN has been derived for the FoD which takes full account of the demographic needs of the area and also considers appropriate allowances for the period. Although an OAN of 310pa is recommended a figure of 320 is to be used in the AP. This together with additional flexibility over the plan period is more than sufficient to provide for the upper figure of 340pa which provides some headroom should new employment require additional housing.

4.2 The revised figure is used to inform the AP in its provision for new housing. This plan will together with the CS (and the CNQAAP) complete a Local Plan for the FoD when it is adopted.

4.3 The AP allocates sufficient new land when the contributions of small sites and other unidentified land is taken into account to provide for more than the 340pa upper figure over the remaining 11 years of the plan period.

4.4 Within the plan period there is a need to ensure that there is a supply of land sufficient for five years supply including an allowance for any under provision and a buffer to ensure that there is sufficient land that can be developed within the overall supply. This generates a separate figure which can be met by a combination of sites to be allocated and assumed contributions from some that are not. The current supply (July 2015) is sufficient for 5.6 years housebuilding including a 20% buffer and making provision for the backlog to be met within the five year period.

