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1. Introduction

1 Introduction

- 1.1 This note provides a brief commentary to accompany the housing trajectory for 2022-27 for the Forest of Dean District (FoDD). It concentrates on the delivery and activity during the past year (2021/22).
- **1.2** Overall a very significant increase in the number of completions was recorded. A total net figure of 493 housing completions was recorded for 2021/22 compared with 358 for the previous year. The current LP requirement is 330pa.
- 1.3 The number of completions recorded shows 143 in Lydney, 64 in Tutshill/ Sedbury, 57 in Coleford where a new large site of 203 commenced in 2020. Newent, with about 376 commitments in total saw 75 completions. 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 4739, which equates to an average of 296 per year, or 72% of the total provision that the LP seeks. In order to provide the entire LP requirement over the next four years (to the end of the plan period) 465 dwellings per year would need to be completed.
- 1.5 The trajectory table shows two estimates for future completions, one based on current full permissions and another taking account of the current outline permissions and allocations as well as pre application discussions. The two estimates lead to a range of between 3.46 and 6.7 years supply being identified. The actual availability figure will be within this range, towards the lower end of the range. It is however 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 2021/2022 a record number of completions were recorded, 493 net. This is a function of the scale of activity on sites being developed by housebuilders as well as the high level of activity providing affordable homes. Overall activity is summarised in the accompanying trajectory table.
- 2.2 Of the total delivery of 493 dwellings in 2021/22, 227 (46%) were affordable these being as follows:
- 2.3 61% of the affordable homes (139) were affordable housing for rent, with 15 of these specifically for social rent. The remaining 39% (88) were provided as shared ownership homes.
- **2.4** The homes were provided right across the district with 47 in Newent, 46 in Lydney, 58 in Coleford, 32 in Sedbury, whilst 44 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	10
Sonoco Former 59 Tufthorn Avenue Coleford P0912/16/OUT	48
Yew Tree Cottage, Gloucester Road Corse P1232/18/OUT	11
Land At Mannings Farm Drybrook P1729/16/OUT	33
Highfield Road Lydney P0108/17/FUL	16
Land Between Lydney Bypass And Highfield Road, Highfield Road P0260/20/APP	4
Land Between Lydney Bypass And Highfield Road, Highfield Road P1953/19/APP	17
Off the shelf purchase Lydney	9
Land North Of, Southend Lane Newent P1330/18/OUT	11
Southend Nurseries Newent P0981/19/FUL	36
Land Off, Beachley Road Sedbury P1792/13/OUT	32

Table 1

Lydney

2.7 The trajectory table shows that much of the current activity is in Lydney where there is scope for at least 424 completions over the next five years with 405 of these on sites that are presently under construction. Current permissions including outline would take this potential total to around 960, and further allocated land in two locations could add another 240 or so dwellings. The situation at Lydney therefore is that land for up to about 1140 dwellings could be delivered on sites that are allocated and or have permission. The majority lie in an area where much of the strategic infrastructure has been provided or provided for in the east of Lydney neighbourhood. A completions rate of about 140 per year on the major sites (ie not including smaller sites windfalls and prior approvals) would appear likely and can be sustained on the sites presently identified and on which there is strategic infrastructure in place. The prime consideration will remain the market and the programmes of the individual builders. There are presently six volume builders with recent (2020/21) 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 be to envisage about 700 completions over the next five years.

Newent

2.8 In Newent there are two sites under construction which will deliver 230 (24 completions in 2021/22) and 50 (no completions 2021/22) dwellings respectively, both likely to be completed within five years. In addition there is a further site of 40 commenced in July 2022 following full approval. Smaller sites in the town will add to this total but these larger sites all under construction will deliver about 301 additional dwellings.

Coleford

2.9 For Coleford, there is one large site with detailed permission for 203 dwellings which is partially complete and will deliver a further 156 dwellings and another for 65 of which 17 remain to be completed. These two will provide another 173 dwellings. Two smaller sites of over five dwellings bring this total to 181. Allocated sites could add an additional 396 dwellings (currently there are planning applications outstanding for about 83 of these on two sites). Given their status as allocated sites and the developer interest in the form of the pre application enquiries, some completions inside five years are likely.

Cinderford

2.10 In Cinderford the situation is that there is one modest scheme currently under construction. A further allocated site is awaiting the finalisation of a S106 agreement following a resolution to permit in outline a scheme for 49 dwellings. Beyond that there are allocated/committed sites capable of accommodating about 485 dwellings. One has outline permission which covers up to 195 dwellings at the Northern Quarter and there is elsewhere an application on a smaller allocated site for 11 dwellings. Several smaller schemes amounting to about 33 dwellings have permission or are under construction.

Sedbury / Tutshill

2.11 Following a period of activity the remaining site at Tutshill/ Sedbury is under construction are capable of delivering a further 26 dwellings, there are no other committed large sites at present.

2.12 The tables below summarise the in relation to the five larger settlements and the situation 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 and one other detailed permission, add estimates of contribution from current outline pps.	424	700
Newent	Current detailed permissions include one site (40) with O/L and application for discharge of conditions and two under construction	301	301
Coleford	Two current sites under construction (156 and 17 remain to be delivered) plus two smaller. Add potential contribution from other allocated site(s)	181	226
Cinderford	Detailed permissions and sites under construction	40	40
Tutshill/ Sedbury	remaining dwellings to be completed on one site and one conversion (9)	35	35
TOTAL		981	1302

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

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	One site part completed (remaining 24 expected to be completed early 2022/23), two additional sites without consent but allocated (+67)	24
Hartpury	One site with full permission	11
Huntley	One allocated site with outline permission (10) one conversion (8)	8
Littledean	One site technically commenced	17

Location	Sites listed- dwellings yet to be started or completed	minimum supply
Longhope	One site commenced dwellings 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)	77
Redmarley	Two sites both under construction	5
Sling	One site allocated no permission (20)	0
Whitecroft	One allocated site current outline application (60)	0
Woolaston	Two sites one allocated (12) one with o/l pp (36)	0
TOTAL		193

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 72pa and for the last five, 64. Past assumptions have used 74 pa which is a figure applied in this paper, being a representation of the annual contribution of small sites to the number of net dwellings over a longer period. It includes those receiving planning permission and accounts for any delivered through the prior approval process. Over five years the total contribution is taken as 370.
- 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.

3. Conclusion

3 Conclusion

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

Source	NPPF deliverable	likely available
Towns and Tutshill/ Sedbury	981	1302
Villages	193	250
Small sites throughout district	370	370
Windfall sites over five dwellings	48	48
TOTAL	1592	1926
Requirement	2301	2301
Supply ()*5	3.46	4.18

Table 4 Housing Supply from estimates

3.2 Both the NPPF minimum assessment and the wider availability consideration show less than a five year land supply. 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. This depends on planning applications which mainly stem from demand and the wishes of individual developers.

Replacement Local Plan

- 3.3 The new Local plan remains at an early stage of development having been the subject of a consultation in late 2020/ early 2021 in respect of its proposed strategy. Following that a revised strategy has been published with consultation from August 2022. The dwelling requirement of 372 pa and 7440 over the life of the plan (to 2041) remains. This means that new sites to accommodate about 4000 dwellings will probably need to be identified for the LP, although government reforms may change this. It is expected that most existing allocations will remain but each site will need to be reviewed especially where not covered by current permissions. This is to ensure that they are likely to be able to make an appropriate contribution to the LP. Sites that have current permissions will normally be expected to be carried forward as commitments. As the LP is prepared sites will be proposed both in the emerging plan and others may come forward from those suggested during the consultation process. The LP examination may result in changes and during the process there may be planning applications for some of the sites that are proposed in the new LP before it is adopted.
- 3.4 In the event that there are major changes to the plan making process these will need to be taken into account and the evolving LP amended accordingly.
- 3.5 Supporting evidence will also need to be considered, prepared and modified as necessary as the plan emerges.

3. Conclusion

Housing Delivery Test

3.6 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 (2021/22) however FoDDC is likely to report a total delivery well in excess of the requirement of 990 (a figure of 1187, which is 120% or 26% over the required figure of 940). This assumes that the requirement is not adjusted to allow for the pandemic. If it is then the provision may exceed the 120% quoted above because of any downward adjustment of the HDT requirement.

Site distribution and nature

- 3.7 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 contributed to the very high and welcome number of affordable homes that were delivered (46% of the annual total or 227 homes). There are two such sites presently under construction at Drybrook and Coleford and one at Newent. Further similar schemes with permission are expected to commence shortly.
- 3.8 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 a further 1100+ dwellings are expected before the existing committed sites are complete. This is likely to provide an on going supply of new dwellings for up to 10 years. As referenced above the trajectory assumes over 400 of these could be delivered inside five years although a larger number are considered to be potentially available within that time frame and the current rate of delivery would 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.

3.9 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) provide a supply of 3.46 years- 1592 dwellings (based on a requirement of 330pa and adding the current backlog (541) from the start of the Plan period (2006/7) and then applying a 5% buffer).

3. Conclusion

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 6.7 years or 3103 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 actual supply is likely to be between the two figures closer to the lower number. 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.

One 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. Many of these form a pipeline and as in the current year will receive detailed consent in due course. Some have outline consent in some cases on behalf of the owner who may not be builder. As a result 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 are likely to reflect the current high level of activity and remain relatively high (above the annual average required) in the immediate future beyond. It is likely that smaller sites (one to five net dwellings) which may have been delayed due to the pandemic will make a larger contribution in 2022/23.

Summary of Housing Land Availability

- Five year land supply- 3.46 years minimum
- Total available 6.7years

Forest of Dean District Council 2022 Forest of Dean Housing Delivery Note 2021 2022