

## Housing Delivery Note 2024-2025

## Contents

<b>1 Introduction</b>	<b>3</b>
<b>2 Review</b>	<b>4</b>
<b>Lydney</b>	<b>5</b>
<b>Newent</b>	<b>5</b>
<b>Coleford</b>	<b>5</b>
<b>Cinderford</b>	<b>5</b>
<b>Sedbury / Tutshill</b>	<b>5</b>
<b>Villages</b>	<b>6</b>
<b>Other district wide contributions</b>	<b>7</b>
<b>3 Conclusion</b>	<b>8</b>
<b>Replacement Local Plan</b>	<b>8</b>
<b>Housing Delivery Test</b>	<b>10</b>
<b>Site distribution and nature</b>	<b>10</b>
<b>Trajectory tables</b>	<b>10</b>
<b>Summary of Housing Land Availability</b>	<b>10</b>

## I Introduction

**I.1** This note provides a brief commentary to accompany the housing trajectory for 2025-30 for the Forest of Dean District (FoDD). It concentrates on housing delivery and activity during the past year. (2024/ 2025).

**I.2** Overall there has been a decrease in the number of completions recorded. A total net figure of 327 housing completions was recorded for 2024/ 25 compared with 431 for the previous year and 517 for the year before.

**I.3** Paragraph 78 of the NPPF requires local authorities to identify and update annually a supply of specific deliverable sites sufficient to provide 5 years' worth of housing against their housing requirement. The NPPF and standard Housing methodology were both amended in December 2024 with the result that the housing requirement for the Forest of Dean District has increased from 330 to 604 homes per annum.

**I.4** The Local Plan in June 2024, was more than five years old following adoption and the calculation of housing need using the "new standard method" now applies. The standard method uses a formula that incorporates a baseline of local housing stock which is then adjusted upwards to reflect local affordability pressures to identify the minimum number of homes expected to be planned for. The latest published affordability ratio (9.38 for 2024) is used giving the annual requirement or new housing is 604 or 12,080 over 20 years. The future availability of land for development is assessed against this requirement. Given the high rate of completions against the supply of sites designed to meet the requirements of the outgoing Allocations Plan and its end date of 2026, the supply looking forward over the next five years and relying on existing sites and permissions remains less than five years at a minimum of 2.2 years. There is a new Local Plan in preparation which has reached its first draft (Reg 18) consultation stage. This draft contains allocations intended to meet the needs of the area for the period 2021- to 2041. Due to the changes in the NPPF the plan period has been reset to 2025 to 2045. A Revised Draft Local Plan consultation is timetabled to take place during the winter of 2025/6.

**I.5** National planning policies require all local planning authorities to maintain a five year housing land supply of 'deliverable' housing sites. Forest of Dean District has a supply of deliverable sites capable of delivering 1175 homes in the five year period 1 April 2025 to 31 March 2030.

**I.6** With a Plan requirement up to provide 6606 dwellings over the 20 years 2006 to 2026, the net total now provided is 6129, which equates to an average of 322 per year. an average which is 97% of the 2005/06 to 2025/26 original Allocations Plan requirement. 92% of the required 6600 dwellings have been delivered and a further 477 would be required over the last year years to reach this total. This may be compared to an annual net completions rate averaging 425 over the past five years and one of 425 for the past three years.

**I.7** The most notable change to the revised National Planning Policy Framework 2024 is the way in which the local housing need is calculated. Housing need is an assessment of the minimum number of homes needed in an area and is the first step in the process of determining how many homes need to be allocated in the Local Plan known as the housing requirement. As a result, the amount of housing the FOD District is required to plan for through the Local Plan has increased significantly – an uplift of 82%, from 330 new homes per year to 600 new homes per year. Over a twenty-year period this would equate to over 12,000 new homes.

**I.8** The trajectory table shows estimates for future completions, and a future supply of about 2.2 years. The actual availability figure may vary as sites presently allocated come forward and is likely to increase. It is also 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.

**I.9** The number of completions recorded for 2024/25 shows 89 in Lydney, 35 in Coleford, 61 in Newent and 28 in Cinderford.

## 2 Review

### 2 Review

**2.1** Completions over the past three years remain at a high level reflecting some major sites which have been developed in Newent, Lydney and Coleford. In 2022/2023 a record high number of completions were recorded, 517 net. In 2023/24 the figure was 431, and in 2024/25, 327 making a three year total of 1275 which is 29% higher than an annual rate as required by the outgoing Plan and by the requirements to December 2024 (using the standard method). Applying the the HDT (Housing Delivery Test) would produce a 100% requirement of 990, 95% of which is 940. The latter set against net completions of 1275 produces a result of 135%.

**2.2** The above figures are a function of the scale of activity on sites being developed by private housebuilders as well as the high level of activity providing affordable homes on sites that are 100% affordable. Overall activity is summarised in the accompanying trajectory table.

**2.3** Delivery of affordable homes remains a key priority for the Council and of the total delivery of 327 dwellings in 2024/25, 30 (9%) were affordable. These comprised 22 (73%) affordable homes for rent, and 8 (26%) for shared ownership. The homes were provided right across the district with 4 in Newent, 6 in Lydney, 16 in Coleford, and 4 in Huntley. Those completed ranged from one-bedroom two-bedroom three and four-bedroom homes.

**2.4** 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).

## Lydney

**2.5** The trajectory table shows that much of the current activity is in Lydney where there is scope for at least 397 completions over the next five years. Completions continue on two sites within the east of Lydney neighbourhood. These sites under construction have already delivered completed dwellings and outstanding consents. Allocated land with outline consent is capable of providing an additional 305 dwellings according to the full trajectory table covering the five year period to 2030 to 2035. The majority of sites lie in an area where much of the strategic infrastructure has been provided or provided for in the east of Lydney neighbourhood and a start on earthworks on the site at Allaston (where there is detailed permission for the first phase and an outline consent for 200 dwellings) adds to this. A completions rate of about 140 per year on the major sites (ie not including smaller sites, windfalls and prior approvals) was assumed previously and is still considered realistic though it should be noted that nearly 90 dwellings were completed in 2024/25. The prime consideration will remain market conditions as perceived by individual builders which are clearly capable of supporting a high rate of completions although variations in the delivery of affordable homes could vary this figure. There are presently six volume builders with recent (2020 on) or current involvement in the Lydney east development (Redrow, Crest, Barratt/ David Wilson, Bellway, Edenstone and Persimmon). A figure at 140pa is 700 over five years and is considered a reasonable estimate of the potential dwelling supply in Lydney over that period given the availability although a lower average is used in deriving the five year supply for this study.

## Newent

**2.6** In Newent there are one site that has full permission in 2025 and will deliver 9 houses all expected in next 5 years. One site allocated in the Draft Local Plan 2024 has Outline permission for 375 homes. There remains one outstanding allocation for housing in the outgoing Allocations Plan for about 45 dwellings. Beyond that new sites are expected to be allocated in the new Local Plan and there is presently one outstanding application for land covered by part of one suggested allocation that adjoins the current outline permission.

## Coleford

**2.7** For Coleford, the one large site with detailed permission for 203 dwellings is now completed and an additional smaller site (17) recently commenced. One site has outline permission for 35 and another allocated site is the subject of a detailed application for 140 dwellings and may contribute in the short term. Further allocated or permitted sites will add to this over the next five year period. Within five years it is estimated that an additional minimum of 90 dwellings can be expected and a further 35 beyond these. There remains a balance of allocated sites able to deliver over 45 dwellings which are not yet the subject of applications and are not counted in the above.

## Cinderford

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

## Sedbury / Tutshill

**2.9** Following a period of activity there are no other committed large sites at present.

## 2 Review

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

Location	comments	Minimum five year supply
Lydney	continued development Lydney East plus two other locations	475
Cinderford	mixed sites one allocated and permitted	97
Coleford	mixed sites included allocations	142
Newent	remainder on consented sites	154
Tutshill / Sedbury	no current sites	0

Table 1

## Villages

Location	Sites listed- dwellings yet to be started or completed	minimum supply
Bream	One site with full permission and technically commenced (9)	9
Drybrook	Two additional sites without consent but allocated (+67)	0
Hartpury	One site with full permission (26 dwellings)	26
Littledean	One site technically commenced	17
Longhope	One site with full permission (12)	12
Lydbrook	One site with full permission (26)	26
Mitcheldean	Three allocated sites in Allocations Plan, one current full application (9)	0
Newnham	One allocated no permission (20)	0
Sling	One site allocated no permission (20) one with consent revised application (9)	0
Whitecroft	One allocated site current outline application and resolution to permit (66)	0
Woolaston	Two sites one allocated (12) one with detailed consent (36)	36

Table 2 Village sites, yet to be started or completed

**2.11** Some additional allocations are proposed in certain villages listed above in the draft LP but their potential contributions are not included in the above.

## Other district wide contributions

**2.12** 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. Over the last 10 years the average was 66pa and for the last five, 27. The actual figure of completions from these small sites is quite variable. It reflects changes such as the use of Prior Approvals and conversions from other sources as well as recent constraints such as the pandemic. For the present a figure of 40pa has been applied giving an expected 200 dwellings on small sites over the next five years.

**2.13** 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 start of the five year period. Although their number is small, they should be allowed for. Historically FoDDC allowed for a total of 81pa which was supported by past trends on small sites. The Allocations Plan ends in 2026. As a consequence the emerging Local Plan anticipates 40 pa for delivery but that it is only the sites that are unknown at the start of the five year period that are to be counted. The Draft Local Plan 2024 allocates sites which have been the subject of planning applications, including one granted outline permission at appeal.

## 3 Conclusion

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

NPPF compliant supply	
Annual requirement	6000
Sub total	3000
Sub total plus 5% = five year requirement	3150
Minimum dwellings available	1253
Years' supply for plan	2.2

**Table 3**

**3.2** The NPPF deliverable assessment shows less than a five year land supply. Although there are additional sites that could become available in excess of these, there is still a potential shortfall.

**3.3** This underlines the need for the Local Plan review to provide additional sites. There is scope in the form of allocated sites and sites with outline consent to come forward in addition to those counted in the above table should the demand support this. All depends on planning applications which mainly stem from demand and the wishes of individual developers. This figure needs to be seen in the context of the continued high level of completions which are being recorded.

### Replacement Local Plan

**3.4** The Allocations Plan (AP) and the Core Strategy are the most up to date plans for the area, adopted in 2012 and 2018 respectively. The AP included an updated calculation of housing requirements in accord with the then guidance. It provided a supply that was endorsed by the Inspector once his recommended modifications were made. The AP is supported by the 2012 Core Strategy. The calculation of housing requirements reverted to the standard method as set out in the NPPF at the time and associated guidance once the AP was five years from adoption on 28th June 2023. The annual requirement set in the AP was 330pa and the standard method at prior to the revised NPPF 2024 led to a figure of 330pa although these are derived in a different manner. Most importantly the standard method is one based entirely on a figure looking forwards with an adjustment intended at that time to take account of the relative affordability in each district. This calculation is the one used for this note using March 2024 affordability figures.

**3.5** In December 2024 the Government published a revised NPPF. The NPPF introduced a new way of calculating the housing requirement and the trajectory figures are based on the new standard method as set out in December 2024.

**3.6** The replacement Local Plan for the FoDD remains at an early stage of development in July 2024 a consultation was undertaken on the Draft Local Plan. This allocated sites proposed for development. Two consultation exercises based on potential strategies were completed prior to that, the most recent in late 2022. Both used the standard method of calculation housing requirements and both took a figure of approximately 7440 dwellings to be required as the starting point for any planned provision.

**3.7** Following the Revised NPPF 2024, the FoDDC agreed to review the local plan strategy and a Local Plans consultation 'Local Plan options to Deliver the Additional Housing Requirement' consultation was held during

## Conclusion 3

the summer of 2025. A revised Strategy was agreed in November 2025 and the plan period was amended to 2025 to 2045. A revised draft Local Plan will be presented to Council in January 2026

**3.8** The overall requirement has been re assessed annually using the prescribed method at the time. The need over the plan period (2025-2045) is now 600pa which would equate to a total of about 12,000. The affordability figure (a ratio of house prices to earnings) does change on an annual basis and the current forecast based uses the latest (2024) affordability figures. Over a 20 year plan the total completions that would be needed to be provided for would be some higher than those previously adopted in the earlier consultations.

**3.9** Looking at the material provided in support of the 2024 draft LP and the revised strategy for the district, the following is a summary of the housing provision proposed. Remembering the plan periods are now different, the following table is a summary of the requirement for the Revised Draft LP 2026.

Revised Draft Local Plan	12,631
Small site contributions @40pa for 20 years	800
Total potential required number 12,000 against supply	13,431

**Table 4**

**3.10** From the above it is noted that the supply over the Draft Local Plan as originally proposed would not provide some the requirement. Although some of the sites proposed to be allocated in the new LP will take time to come forward especially the larger ones, others may be in a position to contribute earlier. There are some current applications that reflect proposed allocations. While these may be premature, their presence does indicate that they are likely to be developed should they be confirmed in the adopted version of the LP.

**3.11** Although not accounted for in the current five year supply, it is likely that the sites identified or to be identified by the new LP will make contributions within five years to the dwelling totals provided.

## 3 Conclusion

### Housing Delivery Test

**3.12** 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 future needs of a plan. LPAs are expected to deliver (really facilitate the delivery of) 95% of their assessed housing requirement in order to meet the test. This, being based on actual completed units lags almost a year behind events. For the most recent HDT year (2024/25) however FoDDC will again report a total delivery well in excess of the requirement. The HDT requires delivery of over 95% of the required number which for the FoDDC would mean over 1026  $((330*2)+(330*0.66)+(600*0.33))*0.95$  dwellings over the past three years. The actual delivery of 1275 dwellings (net) is 124% over the HDT requirement, when using data prior to the revised National Planning Policy Framework update in 2024 for the first 2 years and 8 months and 600 homes pa for the 4 months after the introduction of the Revised NPPF. The HDT is an ongoing annual requirement and is a standard part of the planning system in England and is not under review, the current delivery within the district is in excess of the requirement.

### Site distribution and nature

**3.13** The majority of sites which are under construction are being built by private developers and these include major national companies as well as some that are more locally based. A significant number are also being developed by or for Registered Providers who are active across the FoDD and again contributed to the high and welcome number of affordable homes that were delivered. There is one further site of this nature under construction at Newent. Further similar schemes with are expected to come forward with the guidance and assistance of the FoDDC working in conjunction with the relevant RPs.

**3.14** Of the private (market) sites which in almost all cases provide a share of affordable housing, the greatest level of activity is in Lydney. This reflects the allocations made and approximately another 640 dwellings are expected before the existing committed sites are complete. Further contributions are proposed by way of additional allocations in the emerging Local Plan. The single largest sites outside Lydney are at Newent with an outline permission of 375 dwellings.. 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

The sections in the trajectory table are as follows.

Minimum deliverable- sites which strictly meet the definition in the NPPF of deliverable taking into account marketing constraints where appropriate. These sites and an assumed contribution from small sites (less than six dwellings) and windfall provide a supply of 2.2 years- 1253 dwellings (based on a requirement of 600pa and then applying a 5% buffer to give a total requirement of 3150).

### Summary of Housing Land Availability

- **Five year land supply- 2.2 years minimum**