Strategic Land Availability Forest of Dean District Part 1 Housing December 2017

Introduction

This document brings together the assessments of housing land (SHLAA) with other information in respect of employment land and outstanding commitments for other uses. It considers the current availability as in the Allocations plan and its Main Modifications but also looks at sites tendered as available which may not conform with the current plan policies but could be considered for allocation at a future date. The purpose is to provide a guide of the land which is available or could be considered both for the current and future plans.

Overall spatial strategy

The present spatial strategy for the FoDDC is explained in the adopted CS and its settlement hierarchy. This identifies the four main towns and then three broad categories of village from a few major villages having a population between 4000 and 1000 to much smaller settlements with populations of around 100. The CS and AP take account of this hierarchy as well as the interrelationships between the settlements and the resulting allocations broadly reflect it after taking account of both the overall requirement which must be met across the district and the wealth of physical constraints which apply. In balancing the degree of change between the various settlements, existing commitments, opportunities for redevelopment and deliverability must also be taken into account. Access is a fundamental consideration and the presence of the railway station at Lydney is also material to the plans approach to development.

The present plan

The CS adopted in 2012 and the new AP expected to be adopted early in 2018 together make up the district level LP for the area, with the exception of that area covered by the Cinderford Northern Quarter Area Action Plan. Although the CS was prepared using a different set of assumptions about the rate of housing growth needed its basic strategy is retained in the AP which brings a new and policy compliant housing assessment along with allocations which can deliver the development required. These plans however run only to 2026 after which there is a need for new guidance, probably in the form of a single plan considering the period to 2036.

The current policies are based on the development and promotion of the three forest towns and their surroundings in a manner that is intended to address the desirability to increase or at least retain their service base. There is a clear regeneration focus on the whole district though specifically this is applied to the CNQ and to Lydney and its harbour area. Development is promoted in Coleford and Newent in keeping with the status of these towns and in order to promote growth in the most sustainable locations. In all four towns the scale of current plan commitments for housing is relatively high but this is especially the case in Lydney. Employment land is identified in all towns but again the greatest opportunity is at Lydney with attention being focussed on the harbour as well as the large composite site to the east of the town. In Cinderford which was identified as having the greatest need reflected in relatively high deprivation and educational under achievement, the existing plan is now delivering key elements of the AAP (the new Further Education College and associated infrastructure together with employment and housing).

With a settlement structure that is quite distinctive over much of the FoD and with no one dominant centre the current strategy seeks to both preserve the overall pattern of development and take advantage of the most sustainable locations. Below the towns are large villages generally well serviced by current standards and accordingly new development is promoted at these locations. One settlement which stands out is Tutshill/ Sedbury due to its size and the close proximity to Chepstow which in functional terms it is part of.

Housing

Past Completions

The following table illustrates the number of housing completions recorded in the FoDDC from 1995. It includes the number of these which were on small sites (less than 5 net dwellings). It is useful to refer to the table in order to gain an impression of past activity and it is used for monitoring purposes especially for the current plan period (2006-26). Over the period up to march 2017, 3026 net completions had been recorded, an average of 275 per year. Although a longer running average could be calculated this is of less use as it reflects the previous plan period and also the time before the 2005 Local Plan which allocated land for development. The 22 year average is 250pa.

FoDDC all			
completio	small		
	sites		
1995/6	251	0	0
1996/7	277	0	0
1997/8	260	0	0
1998/9	323	0	0
1999/0	296	0	0
2000/1	168	0	0
2001/2	200	0	0
2002/3	130	0	108
2003/4	152	0	107
2004/5	196	0	114
2005/6	233	0	116
2006/7	205	205	114
2007/8	405	405	167
2008/9	310	310	114
2009/10	118	118	43
2010/11	228	228	43
2011/12	265	265	82
2012/13	230	230	86
2013/14	343	343	75
2014/15	372	372	86
2015/16	303	303	69
2016/17	247	247	82
total	5512	3026	961

Plan allocations and identified requirements

The present AP contains the up to date allocation policies for the whole district with the exception of the CNQ within which about 250 new dwellings are expected. There are over the whole district allocations which can accommodate about 4000 dwellings and in addition there are several sites where housing is promoted as part of a mix but not counted on in terms of adding to the supply. In addition to the named (allocated) sites are those that were not and are not now allocated but have planning permission. A large percentage of the capacity held in these is on small sites (capacity 5 dwellings or below) but there are also an important number of larger sites that were originally permitted as windfalls although they are counted as part of the overall supply once they receive planning permission.

The total number of dwellings in sites included in the AP with estimates of windfall and small sites included is over 5000, although current assumptions are that some 3-400 of these may not be delivered in the next 10 years. This 3-400 is the expected number of dwellings allocated on the east of Lydney sites that are not expected to be delivered within the plan period. The reason for this assumption is simply that the delivery rate assumed does not lead to the completion of the site within the nine years remaining. The land is available and all but one small element with a capacity of approximately 80 dwellings has planning permission.

Expected delivery including windfall and small sites

The annual number of dwelling completions required by the Plan is 330pa plus the current backlog which at 31st March 2017 stood at 604. The AP proposes the backlog be met over the entire remaining plan period. This total requirement over the plan period is therefore 3574 (330*9+604). The sites currently identified have a surplus capacity of about 1256 (total identified 4830 against a requirement of 3574). This surplus is largely a result of the need to ensure that there is an additional 20% buffer applied to the land supply for the five year supply as well as the additional capacity of sites not expected to be built out by the end of the plan period.

Delivery assumptions are based on the housing trajectory and that is itself split into two. The first is an estimate of the five year delivery and the second is the availability assumptions through the remainder of the plan period. The assumptions relate to deliverability and availability as defined in the NPPF, reflecting a realistic prospect that housing will be delivered on the site concerned for the first five year increment and for the second reflecting the consideration that the sites are developable with a reasonable prospect that the site concerned is available and could be viably developed as envisaged. In practice sites are individually assessed and their delivery periods reflect the likely lead times as well as the size which may mean that they are built out over a period stretching beyond the first five years of the assessment. It is the lead times, which are applied to all sites not presently under construction which have the most impact on the delivery assumptions because for example sites that don't presently have planning permission are most unlikely to yield completions in year one or possibly two of a five year period.

Individual sites are assessed in the attached table in order to establish their ability to contribute to the housing land supply. Some of the smaller sites are considered able to be delivered in their entirety quite quickly especially where there is a permission in place, and conversions may also be delivered relatively quickly. Sites that are presently under construction are taken as able to deliver

at the rate established or at a rate considered appropriate for the settlement concerned having regard to any other sites with which they may compete. A single site is likely to have a capacity of somewhere in the region of 40-45 sales per year in most cases for market sales but because of the way in which they are delivered and paid for any affordable housing is additional to this.

It is expected that the sites able to deliver during the first five years of the assessment will include some that do not have planning permission at the start of the five year period. This is true of small sites, windfalls and others. Apart from a modest allowance for windfall and the continued contribution of small sites, these will normally be expected to be allocated in a plan or may include some where permissions have lapsed (some of these will as suggested by experience, be the subject of new, current applications or pre application discussions). Sites that do have permission are treated in the manner prescribed in the guidance (NPPF para 47 footnote 11) so that sites with permission are regarded as deliverable unless there is evidence that they will not be implemented within that period. This evidence may include assumptions regarding the delivery rate and any potentially competing sites. Those with outline permission can be expected to take longer to deliver completed homes and so can sites where there are particular significant requirements for additional preparatory work including infrastructure. Where there is no permission the delivery is likely to take longer but the lead time will vary according to the nature of the site, location and its attractiveness to the market.

The attached table takes the above considerations into account in assessing sites on an individual basis. The assessment is carried out on the basis of information known for each site and that is reflected in the assumed development trajectory. One important consideration is that individual owners, developers and their agents are contacted annually and asked to indicate what they consider to be the delivery prospect from their site(s). The returns are used to inform the final estimates. It includes an allowance for small sites and large sites presently not identified (windfalls).

Land availability FoDDC summary table

	2016	17-	18-	19-	20-	21-	22-	23-	24-	25-	26-		5-10		
Year	- 17	18	19	20	21	22	23	24	25	26	27	0-5 yr	yr	10 yr	9yr
Large sites	165	163	348	595	662	616	565	435	220	185	160	2384	1565	3949	3789
Small sites															
allowance	82	74	74	74	74	74	74	74	74	74	74	370	370	740	666
Large															
windfall															
estimate	0	0	0	0	16	32	49	65	81	81	81	48	357	405	324
Basic plan															
requirement	330	330	330	330	330	330	330	330	330	330	330	1650	1650	3300	2970
Five year															
requirement	477	477	477	477	477	477	0	0	0	0	0	2385			
TOTAL															
AVAILABLE	247	237	422	669	752	722	688	574	375	340	315	2802	2292	5094	4779

Future sites identified in SHLAA process

Complementary to the plan making process and the allocation of sites is the Strategic Housing Land availability Assessment (SHLAA) process. Its purpose is to contribute a forward "bank" of sites that can be considered for allocation in order to deliver new dwellings. It is generally regarded as appropriate that only sites over a certain threshold should be considered, and a size of 0.2ha/5 dwellings is adopted. Smaller sites would not be considered for allocations in plans and would always form the basis of the supply of such unallocated infill or conversions which contribute on average over 74 dwellings per year (there were for example 82 recorded net completions on sites of 5 dwellings or less net capacity in 2016/17).

The trajectory and land supply for the plan draws from policy compliant approved sites (whether they are allocated or have planning permission). The (SHLAA) is compiled from a different starting point, namely one where the current planning policies are set aside and the sites are assessed as to whether they could reasonably be developed. This assessment is carried out by a panel and the assessment seeks to establish whether or not sites tendered to the Council in an annual "call for sites" should be regarded as able to be developed. Sites that are so regarded are then able to be considered for allocation should additional land be required for example as part of a policy review.

The assessment is updated annually on the basis of a "call for sites" whereby landowners and agents are able to submit sites which they consider suitable for housing and wish to be considered for the purpose. The process has been running in the FoDDC area since 2008 and the results are cumulative. This means that sites submitted in the various calls for sites back to 2008 may still be held on the register. Some have gained permission or have been allocated for development and some have been built or are under construction. Some have been removed at the request of owners and or agents. The process however results in a series of sites being identified that are considered able to be developed for housing and which are according to the latest information are considered to be available by the owners or their agents.

New sites are added each year but the nature of the process is that the majority are already identified and some have been so for a number of years. Reference to the maps shows all the current sites and the year in which they were first tendered. In 2008 which was the first year in which the study took place about 300 sites were included. Subsequent years' studies each added somewhere in the region of 25-30 new sites.

Sites newly submitted in 2017 vary from six below the 0.2ha threshold to one of over 25ha, although this latter site may reflect the land holding rather than the area that the owner wishes to promote for development. In all about 112ha of land was contained within the sites newly submitted in 2017. Most represent new land which could be available though some are areas of land that have been modified for the latest submission.

There are 41 new sites submitted in the 2017 SHLAA, 35 of which are considered to be able to be considered after setting aside those below the size threshold. There are suggested sites at Coleford, Lydney and Newent as well as at a number of villages. These include land that has been the subject of previous representations including those made through the AP process, and also current planning

applications. Some relate to land that was being discussed at the AP examination and has now been proposed to be allocated for housing within that plan.

In order to consider the potential sites the SHLAA process refers submissions to its panel. This includes builders, developers, RPs, agents and others involved in housing delivery as well as FoDDC representatives (planning policy, strategic housing and development management). Membership is quite wide (see app x). The final assessment of sites is through this panel which usually meets annually following the circulation of information regarding the sites that have been submitted. The 2017 meeting took place on 13th October 2017. The main outcome is a collective view of the potential of sites new to 2017 as to their possible development potential. Sites which are considered by the panel to be too remote, too difficult to access or otherwise unsuitable are discounted from the assessment. Planning policy considerations such as the location of settlement boundaries and the principles of the hierarchy are set aside although for example a very large site proposed in a small village may still be regarded as difficult or unlikely to be developed because of commercial considerations.

A summary of the 2017 sites is provided as table x. Table xx (link) is a cumulative table and summarises current sites dating from the year of the first submission.

Sites which have permission or are already allocated are reviewed in the SHLAA process though only as a means of establishing their status in the overall supply. They are included in the planned housing trajectory and their availability and deliverability has been established through the AP examination. As is shown above and evidenced in the attached schedules, the supply available from this source exceeds that needed by the emerging AP by a considerable margin. Sites not included in the AP and which do not comply with it yet are capable of being developed form the pool from which additional allocations may be drawn for future plans. It should however be noted that although some will almost certainly come forward there may be others that will despite their technical suitability not be selected.

TABLES

Cumulative table of SHLAA sites can be viewed here (add link)
Allocations Plan housing land availability table with trajectory (add link)
Sites included in the above are all mapped and the map can be viewed here (add link)

The sites submitted for consideration in 2014 and 2015 are considered in 2014 and 2015 interim reports:

- Submissions FoD SHLAA 2014
- Submissions FoD SHLAA 2015
- Large Unallocated Sites with Planning Permission
- Allocated Sites Within The Allocations Plan Submitted Draft 2015

Information in the form of site lists was published for 2014 and 2015. A report outlining the methodology accompanies the SHLAA report for 2012/13, and these together with the earlier

reports can be accessed from the links below. Maps of the sites are available via the link in the individual schedules or from (link to the map).

• Strategic Housing Land Availability Assessment 2012-2013

The reports below remain relevant, however the appendices within the reports no longer link to the associated maps. To view the site maps please refer to Strategic Housing Land Availability Assessment 2012-2013, which contains all submissions from 2008 - 2013.

- Strategic Housing Land Availability Report 2011
- Strategic Housing Land Availability Report 2010
- Strategic Housing Land Availability Report 2009
- Strategic Housing Land Availability Report 2008

SHLAA Sites submitted in 2017

SHLAA is a technical assessment that does not identify or permit the development of land but does assess whether it might have some potential to be considered for development in the future.

Please note that this table is in Parish Order not numerical

Ref No	Site Name	Street	Settlement	Parish Order	Agent	Land Use	На
620	North of Bromsberrow Heath Business Park	Bromsberrow Heath	Bromsberrow Heath	Bromsberrow Heath	Paul Barton - Bruton Knowles	Agricultural Land	0.468
618	Bromsberrow Heath	Dyke House Lane	Bromsberrow Heath	Bromsberrow Heath	Paul Barton - Bruton Knowles	Agricultural Land	5.434
616	Land on the south side of Beach Lane	Beach Lane	Ledbury	Bromsberrow Heath	Paul Barton - Bruton Knowles	Agricultural Land	25.76
611	School of the Lion	Main Road	Churcham & Huntley	Churcham	Owner - Clare Shepherd	Disused private school & campsite	0.542
639	Adjoining Grasshopper Rise	The Purples, Coalway	Coalway	Coleford	Owner Mr P & Mrs S Thomas	Paddock & Garden	0.329
629	Land on Coalway Road	Coalway Road	Coleford	Coleford	Owner - Mr Nigel Jenkins	Small strip of land	0.472
640	Adjoining Grasshopper Rise	The Purples, Coalway	Coalway	Coleford	Owner Mr P & Mrs S Thomas	Paddock & Garden	0.584
643	Readpenny	Christchurch	Coleford	Coleford	Owner Steve Pedrick	Grassland	0.622

Ref No	Site Name	Street	Settlement	Parish Order	Agent	Land Use	На
624	Land East of Kings Meade	Kings Meade	Coleford	Coleford	Jonathan Rainey Pegasus Group	Field	1.855
626	Land at Broadwell Football Club	Gloucester Road	Coleford	Coleford	Jonathan Rainey Pegasus Group	Agricultural Land	2.259
641	<u>Land at</u> <u>Poolway</u> <u>Farm</u>	Gloucester Road	Coleford	Coleford	Jonathan Rainey Pegasus Group	Agricultural Land	2.889
625	Land at Poolway Farm		Coleford	Coleford	Jonathan Rainey Pegasus Group	Agricultural Land	6.061
606	Land at Beechwood House	Springfields	Drybrook	Drybrook	Mr Philip Burford (Hook Mason Limited)	Grounds of main house	0.203
610	Land adjoining Woodland View & Gilnor	The Branch	Drybrook	Drybrook	Owner - Mr David & Mr Bryn Roberts	Over grown land	1.517
637	Beechwood House	Springfields	Drybrook	Drybrook	Mr Philip Burford (Hook Mason Limited)	Grounds of main house	2.708
617	Land opposite Beauchamp Arms	The Village	Dymock	Dymock	Paul Barton - Bruton Knowles	Agricultural Land	2.012
627	Land opposite Beauchamp Arms	Kempley Road	Dymock	Dymock	Paul Barton - Bruton Knowles	Agricultural Land	7.432
621	Land to the rear of 4 & 6 North of	Corsend Road	Hartpury	Hartpury	Owner - Sarah Doel	Agricultural Land	0.223
631	Russell's Nursery	Broad Street (west of)	Hartpury	Hartpury	Mr John Kendrick	Nursery	0.517
635	Land on Longhope Road	Longhope Road	Huntley	Huntley	Scott Winnard	Unused Land	0.285

Ref No	Site Name	Street	Settlement	Parish Order	Agent	Land Use	На
633	Yew Tree Farm	Main Road	Huntley	Huntley	Scott Winnard	Farm	0.474
638	The Wilderness	Hinders Lane	Huntley	Huntley	Owner - Mr Philip Snow	Orchard & grazing	1.464
632	Orchard Golf Course (Part of)	The Fairways/Main Road	Huntley	Huntley	Scott Winnard	Part of a redundant golf course	5.275
634	Orchard Golf Course	Tibberton Lane/Solomons Tump	Huntley	Huntley	Scott Winnard	Part of a redundant golf course	18.54
605	Old Saw Mill Site and adjoining Field	Forge Hill/Joys Green	Lydbrook	Lydbrook	Allen Christoper Duggan	Sawmill Site	0.821
623	Middle Forge	Forest Road	Lydbrook	Lydbrook	Owner - Simon & Tess Tremlett	Part pf Garden/Paddock	0.856
614	West of Driffield Farm	Driffield Road	Lydney	Lydney	Owner - John Watts	Agricultural Land	5.374
608	Land East of Southerns	Southend Lane	Newent	Newent	Ben Pearce	Agricultural Land	4.628
619	Land adjoining Redhill Cottage	Bromsberrow Road	Redmarley	Redmarley	Harry Breakwell - Bruton Knowles	Agricultural Land	3.887
607	Severn Meadows Farm	Crooked End	Ruardean	Ruardean	Philip Burford (Hook Mason Limited)	Farm	0.219
612	West End Farm	West End	Ruardean	Ruardean	Owner Mr R E Duberley	Grazing Horses	1.319
604	<u>Land at</u> <u>Buttermilk</u> <u>Lane</u>	Buttermilk Lane	Newent	Rudford & Highleadon	Rob Aldridge	Open Countryside	0.961
622	Land at the Tufts	The Tufts	Bream	West Dean	Paul Greenway	Agricultural Land	0.189
613	Land adjoining Fair View & White Gates	Montpelier Close	Bream	West Dean	Owners - Denzil Olwyn & Sarah James	Previously used as garden sold off	0.282

Ref	Site Name	Street	Settlement	Parish Order	Agent	Land Use	На
No							
628	Land on the north side of Stantway Lane	Stantway Lane	Westbury- on-Severn	Westbury- on-Severn	Mr Paul Barton	Agricultural Land	5.293
						Total	111.7

Sites that have been previously developed

Within the provision of housing land LPAs are required to promote land that has been previously developed (so called brownfield land). In theory this type of land can provide a variety of opportunities and broaden the range and location of housing on offer. There is now an emerging requirement to establish a formal register of "brownfield sites" which are defined as land that has been previously developed and is suitable for housing. The purpose is to increase the supply of housing by making sites available. In practice the register will contain sites that are already known but the list will be available in one place. There is a link between the register and the government's intention to adopt a system whereby development can obtain "permission in principle". This according to information currently available would sit somewhere beyond an allocation and the present outline consents and is intended to offer greater certainty. For the present however the operation of this assessment is uncertain and it is expected that brownfield land registers will be confined to the information that identifies the site and does not give any approval.

The first year of the register is 2017, and by the end of the year Councils are required to have a register of sites. A draft covering the FoDDC has been compiled and will be published as required. The sites will include some that are plan allocations and others that are not. The list of sites may be found at (link) and they are mapped on (link).

For 2017, 49 sites have been identified in the brownfield register and these amount to about 48.75 ha of land capable of providing between 888 and 1267 dwellings according to the assessment. Some sites are identified because they have potential for housing delivery as part of a mixed development and the above figures are only for guidance. The sites vary in capacity from those capable of accommodating 5 dwellings to one with a capacity for about 150. Although there is an option of identifying sites and granting permission in principle to them this option has not been exercised for 2017.

The register of brownfield land from which this information is taken is compiled and submitted to the DCLG. It comprises a list of sites on which it is considered there would be an ability to complete housing over the next 15 years. Some of the sites may not therefore be developed in the current plan period, which runs to 2026. Some sites are in alternative use, others are vacant or substantially so and another group are vacant but also clear or partially clear of building or other structures. The register will be updated at least annually. Some sites are plan allocations, some have planning permission and others do not. What they do have in common is that they are considered able to be developed for housing having regard to the current planning policies that apply.