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1. Introduction

1 Introduction

- 1.1 This note provides a brief commentary to accompany the housing trajectory for 2021-26 for the Forest of Dean District (FoDD). It concentrates on the delivery and activity during the past year (2020/ 21).
- 1.2 Overall an increase in the number of completions was recorded despite the restrictions and reduced activity as a result of the pandemic, especially between April and June 2020. A total net figure of 358 housing completions was recorded for 2020/ 21 compared with 336 for the previous year. The current LP requirement is 330pa.
- 1.3 The number of completions recorded shows 39% of the total in Lydney, 24% in Tutshill/ Sedbury but very few in Cinderford and Coleford. A new large site is being built in Coleford and will deliver 180. Newent with about 444 commitments in total saw 40 completions. Small sites may have been affected by the slow down in activity early in the financial year with 60 net completions recorded across the whole district.
- 1.4 With a Plan requirement to provide 6600 dwellings over the 20 years 2006-26, the total now provided is 4246, which equates to an average of 283 per year, or 64% of the total provision that the LP seeks. In order to provide the entire LP requirement over the next five years 470 dwellings per year would need to be completed, a rise of some 31% over the last year's number and although the existing sites that are available could support this it may be unlikely that the build rate will rise to this level.
- 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 3.9 and 6.2 years supply being identified. The sites are discussed in greater detail below.

2 Review

Lydney

2.1 The trajectory table shows that much of the current activity is in Lydney where there is scope for between 538 and 837 dwelling completions over the next five years. The former figure does not include any allowance for sites that at present do not have full permission and given the past performance of completions (138 and 143 on the sites listed over the past two years) it would be likely that additional (allocated) land will continue to come forward as it did over 2020/21. Over the year 2020/21 approval for 252 dwellings on three sites was given within the current area permitted in outline. This area has the capacity and (outline) consent for about a further 283 dwellings, and the strategic infrastructure in place. 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. 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/ DW, Bellway, Edenstone and Persimmon). If market conditions remain as they are about 700 dwellings can be expected on sites within the allocations at Lydney over the next five years.

Newent

2.2 In Newent there are two active sites with detailed permission and two with outline permission. The delivery over the next five years is likely to be at least the estimated 339 units. The active sites are for developments of 36 and 230 dwellings respectively. The two outline permissions relate to one site subject to a resolution for a full permission in April 2021 and another subject to a current RM application. Any major increase beyond the expected 339 dwellings depends on two additional allocated sites coming forward which do not presently have permission. There are smaller sites likely to make a modest contribution but for the purposes of the trajectory it is suggested that a contribution of 339 dwellings over five years is appropriate.

Coleford

2.3 For Coleford, there is one large site with detailed permission which is under construction, and will deliver 180 dwellings and another for 65 which is well advanced. Along with the completion of two much smaller sites a minimum of 257 is expected. Further allocated sites without permission could bring this total to 521. One of the potential additional sites has a current application (outline for part of the site) and two others are the subject of current pre application discussions. Together these three sites have a capacity of about 258 dwellings. Given their status as allocated sites and the developer interest in the form of the pre application enquiries, some completions inside five years are expected, and for this note an additional 125 may be a prudent estimate, the likely contribution from sites listed in the trajectory in Coleford is therefore 382.

Cinderford

2.4 In Cinderford the situation is that there is only one scheme currently under construction and one with full consent but not commenced (total 18). Beyond that there is scope for a further 285 completions within five years. There are outline permissions which cover up to 195 dwellings at the northern quarter and an outline application covering 49 on another allocated site. Several of the sites are subject to discussion about their development and could lead to completions within five years, especially on sites subject to current applications or pre application discussions. It is however suggested that the existing estimate based on current detailed permissions is retained (18).

Sedbury / Tutshill

- 2.5 Following a period of activity the remaining sites at Tutshill/ Sedbury which are under construction are capable of delivering a further 93 dwellings, there are no other committed large sites at present.
- 2.6 The tables below summarise the situation in the villages where there are current sites of over 5 dwellings and the above conclusions in relation to the five larger settlements.

Location	Sites listed- dwellings yet to be started or completed	min	max	counted
Lydney	Lydney east continuations and other detailed permission	538	837	700
Newent	Current detailed permissions plus one site subject to RM application	339	339	339
Coleford	Current site under construction plus	257	521	382
Cinderford	Detailed permissions	18	303	18
Tutshill/ Sedbury	Build out of current sites	93	93	93
TOTAL		1245	2093	1532

Table 1 The table summarise the conclusions in relation to the five larger settlements.

Villages

Location	Sites listed- dwellings yet to be started or completed	min	max	counted
Alvington	One site with full permission	11	11	11
Bream	Two sites with full permission	17	17	17
Drybrook	One site under construction (57), two sites without consent but allocated (67)	57	124	57

Location	Sites listed- dwellings yet to be started or completed	min	max	counted
Hartpury	One site with full permission	11	11	11
Huntley	One allocated site now with permission (10) (O/L)	0	10	0
Littledean	One site commenced but subject to further negotiations	17	17	17
Longhope	One site commenced	23	23	23
Lydbrook	One site subject to RM application but stalled (26)	0	26	0
Mitcheldean	Three allocated sites one with full permission but no progress (83)	0	83	0
Newnham	One site under construction (80) one allocated no permission (20)	80	100	80
Redmarley	Two sites under construction	8	8	8
Sling	One site allocated (20)	0	20	0
Staunton Corse	Two sites under construction	32	32	32
Whitecroft	One allocated site current outline application (60)	0	60	0
Woolaston	Two sites one allocated (12) one with resolution to permit (36) o/l	0	48	36
TOTAL		256	590	292

Table 2 Village sites, yet to be started or completed

2.7 The sites listed in the second table include one with outline permission but not a detailed consent, at Woolaston. Here the permission and S106 agreement show a viable site as agreed between the parties and it is therefore considered reasonable to conclude that there is a realistic prospect of delivery within five years. The other sites included in the table are the minimum which can be counted as deliverable.

Other district wide contributions

2.8 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 76 pa and for the last five, 72. 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. It includes those receiving planning permission and accounts for any delivered through the prior approval process. Over five years the total is 370.

2.9 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 of 40pa is suggested, 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

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

Source	Total
Town and Tutshill/ Sedbury	1532
Villages	292
Small sites throughout district	370
Windfall sites over five dwellings	48
TOTAL	2242
Requirement	2472
Supply (2242/2472)*5	4.54 years

Table 3 Housing Supply from estimates

- 3.2 This is at 4.54 years' below the five year requirement. There is scope in the form of allocated sites and sites with outline consent to come forward, but primarily this depends on planning applications which mainly stem from demand and the wishes of individual developers. This is considered a reasonable estimate of likely supply.
- 3.3 The supply taken from the minimum figures in the trajectory is as follows:

Source	
Town and Tutshill/ Sedbury	1245
Villages	256
Small sites throughout district	370
Windfall sites over five dwellings	48
TOTAL	1919
Requirement	2472
Supply (1939/2472)*5	3.88 years

Table 4 Supply for minimum figures in trajectory

3.4 For the maximum considered:

Source	Total
Town and Tutshill/ Sedbury	2093
Villages	590
Small sites throughout district	370
Windfall sites over five dwellings	48
TOTAL	3092
Requirement	2472
Supply (/2472)*5	6.25 years

Table 5 Supply for maximum figures in trajectory

Replacement Local Plan

- 3.5 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 the potential options for its strategy. This used the then dwelling requirement of 372 pa and 6600 over the life of the plan (to 2041). New sites will need to be identified for the LP. It is expected that most existing allocations will remain but they will all need to be reviewed especially where not covered by a current permission to ensure that they are able to make an appropriate contribution to the LP. Sites that have current permissions will be expected to be carried forward. As the LP is prepared sites will be proposed and identified and will then either be considered and allocated (or not) as part of the LP examination process or may be the subject of applications which will be decided accordingly.
- **3.6** 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. Supporting evidence will also need to be considered, prepared and modified as necessary.

Housing Delivery Test

3.7 The Housing delivery test (HDT) is a measure of actual delivery of new dwellings, measuring numbers delivered over a rolling three year average. It sits alongside the requirement to have a land supply sufficient to meet the needs of a plan or other measure. LPAs are expected to deliver (really facilitate) 95% of their assessed housing requirement in order to meet the HDT. The being based on actual completed units lags almost a year behind events. For the current year however FoDDC is likely to report a total delivery of 964 units against a requirement of 990. This equates to 97% delivery and meets the requirements of the test (the figure being above 95%. For the previous year the delivery in FoDD was 94% or the calculated requirement. The previous test was adjusted to allow for less building activity due to Covid, should the test for 2021 do the same the FoDDC performance would improve.

Site distribution and nature

- 3.8 The majority of sites which are under construction are being built by private developers and these include major national companies as well as more local. A significant number are also being developed by Registered providers who are active across the FoDD. There are three such sites presently under construction at Drybrook, Coleford and Newent covering a total of 158 dwellings all of which will be affordable.
- 3.9 Of the private (market) sites which in almost all cases provide a share of affordable housing, the greatest level of activity is in Lydney as referenced above. This reflects the allocations made and a further 1400 dwellings are expected before the existing committed sites are complete. This is likely to provide an on going supply of new dwellings for about 10 years. As referenced above the trajectory assumes up to half of these could be delivered inside five years although a larger number are considered to be potentially available within that time frame. The single largest site outside Lydney is at Newent with a development of 230 dwellings under way and one of 180 at Coleford also under construction.

Trajectory tables

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

3.10 The sections in the trajectory table are as follows.

Minimum deliverable- sites which strictly meet the definition in the NPPF of deliverable taking into account marketing constraints where appropriate. These sites and an assumed contribution from small sites (less than six dwellings) provide a supply of 3.9 years- 1939 dwellings (based on a requirement of 330pa and adding the current backlog from the start of the Plan period (2006/7) and a 5% buffer- 704).

Minimum available- sites considered likely to be available but not available now (includes outline permissions allocations and some subject to pre application discussions). Some of these are likely to receive detailed consent and be implemented wholly or in part over the next five years. The trajectory graph reflects the fact that a number of sites that are considered highly likely to be deliverable are not counted in the minimum above but in the first years of the 6-10 year period.

Maximum deliverable- 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 6.2 years or 3084 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.

Maximum available- total potential availability to 2026/27.

3.11 One notable feature of the graph and tables is the relatively high level of completions expected in the first two years of each five year period. For the first, 2021-23 this is a reflection of the sites now started and may be in part due to some delays during the pandemic. The table and comments show some large sites now started but which did not produce completions in 2020/21, at Lydney, Newent and Coleford. The upturn at the start of the second five year period is more a reflection of the NPPF definitions whereby sites that have outline permission may be regarded as available and developable but do not have detailed consent. Many of these form a pipeline and as in the current year will receive detailed consent. With the exception of those sites referred to above they are not counted in the minimum supply.

Summary of Housing Land Availability

Annual requirement	330
five year net requirement	1650
backlog (difference between annual requirement *15 and completions)	717
sub total	2367
sub total plus 5%= five year requirement	2485
total completed in plan period	0
minimum dwellings available	1939
years' supply for plan	3.90
maximum available	3084
years' supply for plan	6.20

Table 6 Summary of housing land availability

