

# Housing Action Plan 2020

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# 1. Introduction

## Preface

**1.1** This is an action plan prepared in response to the housing delivery recorded in the delivery test of 2019 for the Forest of Dean District (FoDD). Its purpose is to examine factors which govern housing delivery, look at the likely past and future rates and consider how the current levels may be increased. The contents are based on government advice including that provided by the Planning Advisory Service (PAS).

**1.2** *This action plan is being prepared early in 2020 and its implementation will be affected by the current Covid 19 emergency. Although analysis of the past situation is possible, forward actions are likely to be affected and the prevailing economic conditions (June 2020) will have an impact beyond the influence of individual LPAs. The impact may be both short and long term with building sites being closed for a while and planning applications affected by the inability to visit sites. Although building activity is being resumed it is not clear if the rate of past completions will be able to be continued, either because of limitations on working practices or an overall economic slow down which is widely predicted.*

## Housing Delivery Test (HDT) introduction

**1.3** One of the ways in which government seeks to ensure housing delivery reaches the prescribed levels across the country is by an annual assessment of the numbers delivered within each local authority area against a calculated expectation. This “housing delivery test” invokes a set of sanctions when an authority’s level of housing delivery falls below various calculated thresholds in the test. It is a separate test to any which seek to maintain a supply of land either for a five year land supply, or any requirements of a Local Plan to identify land for a number of units over its life.

**1.4** The housing delivery test uses an average of the number of homes completed over a rolling three year period expressed as a percentage of the number calculated to be required. The precise calculation method varies between LPAs as it takes account of what plans are in place and how up to date they are. For the FoDD the number required is calculated by a method that for 2018/19 uses the current Local Plan annual housing requirement as well as the annual average growth requirement derived from ONS (Office for National Statistics) figures. The annual average growth figure is lower than the calculated local plan requirement and is used for the first two years of the three in the rolling average during which there was no up to date plan. For the FoDD the figures give a requirement of 887 dwellings. The last three years completions total 786. Dividing the latter into the former (786/887) gives 89% which is the delivery test result.

**1.5** For the 2019 delivery test, there is a requirement that delivery should be 95% of the calculated requirement or over. Where it is between 85% and 95% the authority is required to prepare an “Action plan”. Where the figure falls between 45% and 84% there is a requirement for a 20% addition to the land requirement and also a need for an action plan. For delivery below 45% there is an application of the presumption in favour of development as in the NPPF, the 20% buffer is applied and there is a need for an action plan. The action plan should be prepared within six months of the test result, meaning it will be able to assess the delivery of housing during 2019/ 20 as well as the 2018/19 figure and the two before that triggered the need for it.

## 1 . Introduction

**1.6** The next delivery test (figures likely to be published February 2021 will require delivery of 75% or more of the requirement to avoid the presumption. The numerical requirement for the FoDD will also be higher than for this year because of the way in which the rolling average is calculated. There is therefore an increased risk to authorities including the FoDD where delivery of housing is lower than the calculated requirement although delivery for 2019/20 in the FoDD did meet the plan requirement (336 net completions recorded against a required 330).

**1.7** Any LP needs to strike a balance which seeks to implement its objectives. These include conservation, the move towards carbon reduction and the delivery of development.

## 2 . Identification of land requirement

### Identification of land requirement

**2.1** Although delivery ultimately depends on land supply it also requires the implementation of planning permissions and the flow of these. The identification of land in a plan is broadly within the control of the LPA, and sites that are allocated in a plan will have the support of an Inspector at a Local Plan Examination. Often the sites have been discussed in some detail and some may have been brought forward on the recommendation of the Inspector during the Examination. Where the Examination is reasonably recent the general conclusions of the Inspector (that the relevant sites are suitable for inclusion in a Plan) are likely to remain relevant. It is however the case that sites that are in a plan are not confined to those that are immediately available, but are intended to make up a suitable land supply throughout the Plan period with an appropriate buffer in accord with any required by government and any recommended or endorsed by the Inspector. The Examination considered the overall level of provision that is appropriate and set that together including any additional allowances which the Inspector recommended. This has a direct bearing on the figure that is tested in the delivery assessment.

**2.2** The current Local Plan for the FoDD comprises both a Core Strategy (CS) dating from 2012 and a more recent Allocations Plan (AP) adopted in 2018. There is also an Area Action plan (AAP) for part of Cinderford in the form of the Northern Quarter Area Action plan, adopted in 2012. Although the AP is bound to the CS in terms of its time frame (2006-26), it does contain a new NPPG compliant assessment of housing requirements which was fully examined, amended and endorsed by the Inspector. The current LP seeks to provide 6600 dwellings over its life which converts to an average rate of 330pa. This is the figure, along with an older requirement which informs the 2019 HDT calculation with its three year rolling average as set out in the HDT guidance and briefly described above. The HDT requirement is unique to that exercise even though it is based on the overall plan requirement.

**2.3** Having established the number of dwellings that according to the test are required to be delivered, the next stage is to assess the actual delivery.

**2.4** There are two further steps to delivery once a site has been identified in a plan, the granting of a permission and the actual implementation of a permission. In addition sites that are not allocated (windfalls) will come forward in addition and add to the supply. The FODDC has some control over the granting of permissions and can and does assist with the implementation but is dependent on there being a flow of applications in the first place. The outcomes of applications can be influenced by various considerations although those in general accord with any LP allocations would be expected to be permitted. Delays do occur and equally some unforeseen issues may delay or even make development impossible. Finally and most importantly the implementation of permissions depends on individual developer(s). These vary from small builders building to order (including custom and self- build) but also larger housebuilders. In between are small and medium undertakings often locally based, building on a speculative or semi speculative basis.

**2.5** Permissions are often not, at least in the first instance, gained by builders. Many are sought by developers seeking to pass on land once it has permission. Sites within this category rely on there being a willing builder, and therefore are dependent on there being a market.

## 2 . Identification of land requirement

**2.6** The FoDDC seeks to bring forward development in allocating land in its up to date LP, and in permitting schemes in accord with its policies. It has processes in place to ensure that applications are dealt with in a timely manner but ultimately the implementation of these is only partly in its control.

**2.7** This action plan examines these issues further against the context of the FoDD, its sites and the housing market. It shows how delivery can be increased, and how the present trajectory and the allocations contained within it should achieve this. The performance of individual sites is considered along with more general issues.

## 3 . The Action Plan subject areas

### The Action Plan subject areas

**3.1** The action plan considers the following general areas in the manner described:

- Barriers to early commencement after planning permission is granted and whether such sites are delivered within permitted timescale.
- Barriers to delivery on sites identified as part of the 5 year land supply (including land banking, scheme viability, affordable housing requirements, pre-commencement conditions, lengthy section 106 negotiations, infrastructure and utilities provision, involvement of statutory consultees etc.)
- Whether sufficient planning permissions are being granted and whether they are determined within statutory time limits
- Whether the mix of sites identified is proving effective in delivering at the anticipated rate
- Whether proactive pre-planning application discussions are taking place to speed up determination periods
- The level of ongoing engagement with key stakeholders (for example, landowners, developers, utility providers and statutory consultees), to identify more land and encourage an increased pace of delivery\*
- Whether the existing housing market can deliver increases in the rate of completions
- Other ways in which delivery could be increased especially in respect of housing need experienced in the FODD
- The timescale over which changes to the delivery rate can be made.

**3.2** Some of the above apply in cases where demand for development is being restrained by the availability of sites. The removal or easing of these restraints would then be expected to increase housing delivery. This is however not always the case because the actual demand is lower than the level of calculated “need”. The market may not support the level of development said to be required and other ways to deliver must then be sought.

**3.3** \*1- 6 above taken from Housing Delivery Test: Preparing Effective Action plans – Resource Pack Notes PAS 2019.

**Barriers to early commencement after planning permission is granted and whether such sites are delivered within permitted timescales.**

**3.4** When to commence development following a planning permission is a matter for the developer. Often sites will commence soon after a permission allows it but there is no obligation to do so. Permissions with short lives can sometimes be considered in order to encourage progress but there is a risk that they may lapse during negotiations and require additional more complex submissions (for example a new full application). Recent measures to extend the life of permissions because of the Covid-19 situation take account of probable delays which will have an (unavoidable) effect on delivery but provide welcome support to allow development that is approved to proceed.

### 3 . The Action Plan subject areas

**Barriers to delivery on sites identified as part of the 5 year land supply (including land banking, scheme viability, affordable housing requirements, pre-commencement conditions, lengthy section 106 negotiations, infrastructure and utilities provision, involvement of statutory consultees etc.).**

**3.5** Development that takes place should be policy compliant and even though sites in the current (2018) LP are not assessed in quite the same way in respect of viability as would now be required all are considered suitable for allocation. Many will require S 106 contributions, all over a certain size (in practice all LP allocations) will need to deliver affordable housing subject to viability testing if below the level initially sought by the FoDDC. The post application negotiations and requirements that may occur are considered below.

**3.6** The level of S106 contributions can have a major impact on site delivery. Although sites allocated in the LP were considered able to be delivered at the time of allocation, changes in the scale of contributions can have an impact on some sites to the extent of potentially making them unviable, or at least reducing the affordable housing contribution. The increased emphasis on assessing viability at the plan making stage which the NPPF now brings may help but the upward trend in contributions that are sought will continue to squeeze viability and hence affect delivery of sites.

**3.7** At present there is no CIL applicable in the FoDD.

**3.8** Sites individually identified in the five year supply will form a large part of the pool of land which will deliver new housing. This pool is composed of sites that are viable, relatively free of constraints and preferably have planning permission but even with these conditions being satisfied there can be no ultimate guarantee that they will be developed. Because of the operation of the additional buffer (20%) and the need within the current calculation to allow for the backlog from the elapsed part of the plan period, this required element of supply is quite large. The available sites that are presently identified in the FoDD are sufficient to provide for about 5.8 years supply which amounts to about 3135 dwellings. This figure is well in excess of the basic level of housing need (either as suggested by ONS trends (ie forecasts) in household numbers or even when adding any additional allowance intended to counter non- affordability). Although the HDT uses a different calculation, the availability of a five year supply which could facilitate over 3000 dwellings means that there is no shortage of land. Study of the individual sites (see app 1) demonstrates that there is a wide range of sites and locations. The action plan considers the sites in the five year land supply in respect of how they are actually coming forward (or not). The last point is where a consideration of land banking becomes necessary as the sites which are able to contribute to the five year supply are by definition considered free of other known constraints which would prevent their development.

**Whether sufficient planning permissions are being granted and whether they are determined within statutory time limits.**

**3.9** The flow of planning permissions and applications is not something councils are in direct control of. Whilst this is an issue the action plan will consider, it can only examine what could increase the number of permissions and speed them within the context of this limited control. The time taken to determine applications is relevant to housing delivery but must be considered in the



### 3 . The Action Plan subject areas

knowledge that there are things that determining authorities can do to speed determination but they are not able to do everything. They depend on consultee responses being timely, on agents and applicants responding to queries and on unforeseen matters being dealt with as rapidly as possible.

**3.10** Once a LP contains an appropriate set of policies and a suitable set of allocations, the system is wholly dependent on applications being made. They can be encouraged to a degree and should be dealt with efficiently but ultimately cannot be generated. The action plan can consider what is affecting the flow of applications but other events including individual land owner's desires and even global economic conditions may hold the whip hand.

#### **Whether the mix of sites identified is proving effective in delivering at the anticipated rate.**

**3.11** Both the previous NPPF and the current version strongly encourage a range of sites to be allocated for housing including small sites (under 1ha) and previously developed land. Specific percentages (for example the small sites quota set at 10% in the 2019 NPPF (p68)) were not in the guidance at the time the FoDDC LP was completed but it contains a broad range of sites in terms of size and whether they are previously developed or not. The action plan will consider the range of sites allocated and otherwise supported or encouraged by the LP, and their contribution. Changes to this are only possible through the relatively long term review of the LP or its policies.

**3.12** Related to the question of the mix of sites is the possibility that a plan depends on a few major sites that may take a long time to come forward. This is an important issue and lead times are often longer than originally expected, including in the FoDD. Once major sites are under way however they may then deliver relatively consistently over a long period, again a situation that is apparent in the FoDD. This is especially true of the major development at Lydney, set to provide about 30% of the plan requirement. Now it is under way with four volume builders being active it is likely to contribute about 150 dwellings per year for the remainder of the plan period. In 2018/19 and 2017/18 its contribution was less, as fewer builders were active but it saw 150 completions in 2019/20. That represents 45% of the total annual requirement of 330pa. The action plan will need to consider this aspect of delivery both in respect of the lead times and in the continuity that can then be provided on the larger sites between the various component "cells".

**3.13** Smaller sites (1-5 net dwellings) consistently provide about an average 74 dwellings per year, over a long period. This has been monitored and 1181 net completions recorded from these sources (conversions and new build) over the 14 years of the present plan period. That is about 30% of the total and policies will continue to support the continued contribution of these sites. This is slightly above the assumed contribution which is the long term average of 74pa.

**3.14** Delivery reflects the geographical pattern of allocations to a large degree but a more detailed comparison highlights where there are allocations which are not coming forward and this in turn suggests that intervention is desirable to address this. It is most apparent in the Cinderford area where values are lower and where sites have historically benefitted from public money (for example from Homes England (HE) or their predecessors) in order to deliver. The Council has strong links with HE and Registered providers and is currently targeting particular sites including some that are council owned to bring them forward.

### 3 . The Action Plan subject areas

#### **Whether proactive pre-planning application discussions are taking place to speed up determination periods**

**3.15** Discussions before and during the life of a planning application are essential and can speed the process. Often they can be seen to do so but there are also cases where there are delays in receiving information or where there are differing views and issues therefore arise which need to be resolved if a permission is to be granted. Delivery is undoubtedly aided by discussion and timely responses. Delays can occur where there are unforeseen issues which arise and where for example additional studies re necessary. Some are unavoidable and may occur because of protracted involvement with statutory consultees or providers seeking to resolve complex issues. Some may be attributable to the lack of resources in some of the bodies that are consulted and need to have an input into applications before they can satisfactorily proceed.

#### **The level of ongoing engagement with key stakeholders (for example, landowners, developers, utility providers and statutory consultees), to identify more land and encourage an increased pace of delivery.**

**3.16** In order to assess how changes to stakeholder involvement may increase housing completions it is first necessary to consider the present nature and level of involvement. This varies from the annual SHLAA (Strategic Housing Land Availability Assessment) to the agents forum at which those submitting planning applications or otherwise engage in the planning process are invited. There is also an annual survey seeking agents' and developer/ land owner views on when development of their sites is expected to take place and an opportunity within this study exists to volunteer any impediments. At the start of the process is the engagement in plan making, which runs alongside any SHLAA exercises. Engagement in plan making is vital in order to be able to properly test options for allocation but it can be several years from the point where sites are in a position to deliver.

#### **Whether the existing housing market can deliver increases in the rate of completions.**

**3.17** Although the prescribed assessment sets the yardstick for the delivery test, it is important to consider if the existing market is capable of increased delivery. There may be actions for the FoDDC directly to speed or otherwise assist the delivery process or there may be actions that developers themselves would need to take. Close to this issue is the one of whether the market can support increased delivery which needs to be underwritten by increased sales. All local housing markets have a finite limit in terms of delivery rates and the same applies to localities. One town for example may be able to support two or three volume builders being active at the same time but no more. Each outlet will have a limit, often 30- 40 houses for sale. Although evidence suggests that the market can support a rate higher than this at one town, Lydney the other locations in the FoDD where there are large sites available may not and historically have not even when a range of sites have been available.

**3.18** The market which is addressed by volume builders is undoubtedly finite and it is likely that the current developments that are under way represent the approximate delivery ceiling for this type of development. There are current large sites being delivered by national builders at Newent (one site soon to be two and a further site to be developed by an RP), Lydney (four outlets), Coleford (one outlet and a further site being developed by an RP) and Tutshill (three outlets).

### 3 . The Action Plan subject areas

#### **Other ways in which delivery could be increased especially in respect of housing need experienced in the FODD.**

**3.19** Given the apparent market conditions in the FoDD, where some localities are, despite a range of sites and permissions being available, seeing proportionately less activity it is important to consider other ways in which housing can be delivered. Historically and in some areas of the country this includes delivery directly by Councils but in the FoDD it means by intervention by Councils but delivery mainly by others. It may include Councils setting up delivery vehicles such as housing companies, actions in partnership with RPs (Registered Providers) and partnership/contact directly with HE (Homes England). All are currently being explored.

#### **The timescale over which changes to the delivery rate can be made.**

**3.20** The purpose of the Action plan is to examine how delivery of new homes can be increased and it must look at the timescales over which such increases can be made. This is relevant both to the measures themselves but also to the need for them. Both short and long term measures will be considered generally and in the light of the housing trajectory (which shows the overall upward trend in the availability of developable and available land).

**3.21** To have scored 95% in the delivery test would have required an additional 56 homes to have been delivered over three years (19 per year). Although an increase in delivery of this magnitude would not however be sufficient to meet next year's test, a relatively modest further increase in delivery will still satisfy the 2020 HDT. It may be that a single one of the potential actions or trends below would suffice to bring the level of delivery above the 95%. It is however considered appropriate that the action plan reviews a wider range of measures which could increase delivery. This will improve confidence in respect of the five year supply sites coming forward and improve current delivery or show how it will increase in the future. The summaries below show the general matters to be addressed.

#### **The housing trajectory**

**3.22** This considers on an individual basis the estimated yield from all sites with a net capacity of more than five dwellings. It accounts for sites that are allocated and those that were not. It also includes assumptions for contributions from small sites (see above) and windfalls. It reflects the lead times associated with the allocations new to the AP (Allocations Plan) and shows which sites could reasonably be expected to deliver new housing and the numbers expected to be able to be delivered over the next 10 years. The trajectory shows potential for a rapid increase in delivery as new allocations come forward. This is partly because a number of the larger sites now have permission and are being developed whereas a few years ago whilst the land was available construction was yet to begin. At Lydney where there are now four active volume builders, delivery is expected to continue over a number of years (at least 10) and will form an important part of the supply. Additional sites at Coleford and Newent which have not yet recorded any completions will do so in 2020/21. The trajectory as it presently is therefore shows potential for increased delivery and the following actions will support its realisation.

## 3 . The Action Plan subject areas

### Work with Homes England (HE)

**3.23** The Council are already engaged with HE who are responsible for funding delivery of housing on many sites across the country. Within the FoDD they are supporting registered providers and at present there are a number of allocated sites that are likely to be delivered by them through HE support. This mechanism of delivery is especially important in part of the FoDD where viability issues make some sites less attractive to the private sector. Two current sites being supported in this manner are Tuffthorn Avenue, Coleford and Southend nurseries at Newent. The former has commenced. Together they will provide about 100 dwellings, probably over two or three years. There are several more, not least at the Northern Quarter at Cinderford (land owned by the FoDDC and held for the purpose of delivering housing and related mixed development) which are presently under discussion. This delivery route will provide an increase in the numbers of completed new homes.

### Work with registered providers (RPs)

**3.24** Closely allied to the above is the work with RPs that will continue and helps greatly in the delivery of sites exclusively developed by RPs (often for a variety of affordable tenures but may include market sales). This working together also assists in achieving the mix of dwellings required on sites with a share of affordable housing, ensuring they come forward in a timely manner. The RPs themselves may be seeking to spend increased funding provided to them by HE. This source of supply is one that directly addresses the shortage of affordable housing as well as being able to develop sites that may not be attractive to the volume builders, it is however susceptible to viability issues especially related to the level of s106 contributions that are sought.

### Liaison with developers

**3.25** Contact with potential developers from the early stages of plan making through pre application discussions is essential. There is an annual exchange of information seeking developers/ owners and agent's estimates of delivery on sites for which they are responsible. Pre application discussion and other contact helps ensure that suitable sites are able to deliver in a timely manner. During the development itself, contact needs to be maintained and helps ensure smooth delivery. Some schemes change during the development phase, to increase the number of units for example.

### Development management

**3.26** Much is already done to ensure that planning applications are processed efficiently. Delays may be external to the FoDDC and there is a continuing drive to improve processes such as handling and speeding consultation responses. Some delay due to protracted S106 negotiations (post consideration by committee) still occurs and may be due to the developer. Discharge of conditions may result in delay but requirements for this are held to a minimum or are used where necessary to enable sites to proceed.

## 3 . The Action Plan subject areas

### Delivery of individual sites

**3.27** The above aspects of delivery are areas where there may be scope for improvement though they are areas where the FoDDC is already active. There are some aspects of implementation where the FoDDC has little or no control and which can create delays in implementation. It is up to individual developers whether to submit planning applications, when to develop and at what rate. While sites must be able to be developed, the market will to a large extent govern how and when.

### Additional evidence

**3.28** Current studies, especially into the viability of development sites will be used to inform the action plan and consider how viability affects the sites involved. There are assessments of individual sites for planning applications as well as a (draft) study being undertaken to inform the new 2041 Local Plan.

### Does the Council have a corporate approach to delivery/growth issues currently? If so, where is this reported to?

**3.29** The Council has a set of corporate objectives including growth aspirations. It is committed to the delivery of development in accord with the LP, and will have the same objective in respect of the new LP. It is strongly committed to the delivery of carbon neutrality.

### How active/willing is the Council to adopt a proactive approach, such as direct funding, delivery or use of its own land/assets, or bidding for government funding? If so, where are these decisions made?

**3.30** Apart from its own small direct development, the FoDDC has examined ways in which it can be more actively involved in the development process. It holds little land with the exception of part of the Cinderford NQ and is in close contact with HE and providers. The development of the land is considered more likely with the use of existing mechanisms rather than the establishment of a new vehicle. Ultimately decisions of this nature are made by Cabinet. The FoDDC has a long history of successfully negotiating and enabling the delivery of affordable housing and is well placed to apply the same efforts to aid the delivery by RPs of more (using the HE funding that is currently available).

### Might a solution need to involve a different approach to the allocation of land to meet need?

**3.31** The overall approach to the allocation of land both in the current and recent AP and in the new LP is to allocate sites in a manner that complies with local and national policy. This will remain. The NPPF sets out how this range should include small sites as well as previously developed land. The outgoing AP inherited a large number of sites from its predecessor and the new LP will also include some first allocated or commenced under the previous plan. The new LP looks over a longer horizon (to 2041) and will be able to make allocations expected to be delivered over this period and possibly beyond. This will provide continuity, while at the same time sites now active and expected to continue over the new plan period will provide continuity. With the ability and need to identify a larger number of new sites for development over a longer period the new LP should secure the delivery levels required.

## 3 . The Action Plan subject areas

### **Is there an issue of resources – either around monitoring or potential, identified actions?**

**3.32** Like all LPAs there are constraints on resources however the range of actions considered is able to be implemented. These constraints are most apparent given the current pandemic with diversion of resources to other essential tasks. The FoDDC overall is like many LAs under extreme budgetary pressure. Resource issues are apparent within partner organisations as well as in the FoDDC and inevitably have an impact on the ability to process applications and prepare up to date plans.

### **Do the identified issues have implications for other Departments; authorities or organisations?**

**3.33** In identifying actions, a variety of interactions with other bodies have been referred to. These include statutory consultees, utility companies, and bodies such as the LLFA (Lead Local Flood Authority) and the highway authority. Most have limited resources and dialogue is generally under way about how to save time in considering applications while addressing what are frequently complex issues.

### **Where should decisions be made and progress reported?**

**3.34** Both the planning Committee and the Cabinet of the FoDDC should be involved.



## 4 . Actions proposed

### Potential Actions

**4.1** Areas to be considered in the action plan are introduced below along with the potential contribution they could make to increase delivery alongside a comment as to how the Action plan considers each of them. These are related to the issues above.

### Actions proposed

**4.2** The following are key actions considered appropriate to maximise housing delivery in the FoDD. Some are new while others represent a continuation of current practice. They are taken from the potential actions above.

**Revisiting the Strategic Housing Land Availability Assessment (SHLAA) / Housing and Economic Land Availability Assessment (HELAA) to identify sites potentially suitable and available for housing development, including public sector land and brownfield land.**

**4.3** The SHLAA process is one that has been conducted on an annual basis in the FoDD and has most recently contributed to the AP and in particular the process of identifying additional sites allocated during the examination process. The current (2020) SHLAA will inform the new 2041 LP as one of the key inputs to that. As of June 2020 the sites submitted were being assessed by a “virtual” panel. As it is conducted on an annual basis and sites are assessed by a panel including developers (public and private sector) it forms an input into site identification. It will be most use in allocating sites in the forthcoming plan rather than any interim identification of land as it is not considered that the latter is necessary at present.

*Action: Continue with the annual call for sites (SHLAA) exercise and review sites for potential to become allocations in LP.*

**Working with developers on the number of houses on site, including whether sites can be subdivided.**

**4.4** Sub division of sites is seen only in the very largest of the FoDD sites at present and is largely governed by how the developer wishes to see the site released. The FoDDC has been flexible in accommodating this in response to needs and this has enabled the site to be developed at the present rate.

**4.5** There are almost always negotiations in respect of the number of dwellings that may be accommodated on a site. The initial guide is often the AP policy but there is scope for variation. This may however result in an increase or a decrease in numbers in seeking to provide a suitable development that is both viable and addresses the need for affordable housing. Examples in the FoDD include one site increased from 170/ 180 to 230 now approved, another allocated for 50 likely to provide 57 but also another providing 80 rather than 85. There are several variations within the major development east of Lydney including one site with permission and expected to deliver 177 dwellings rather than the original 110 in the first outline permission. There are other

## 4 . Actions proposed

areas where there has been a reduction in densities. Overall there tends to be a greater number of dwellings delivered on sites than the number allocated, though this hides a variation between individual sites. It is important to realise the potential of every site but this is not just about numbers.

*Action: Continue to discuss site delivery as required. This includes possible sub division.*

### **Offering more pre-application discussions to ensure issues are addressed early.**

**4.6** As referred to in the discussion of issues, early engagement in the application process is already encouraged and pre application submissions are regularly used. They have real benefits in respect of all levels of application where there is a dialogue which can highlight and address issues that may arise. The FoDDC do not at present charge for these and while they are able to address matters in control of the FoDDC, involvement with other key agencies and consultees depends on their often limited resources.

*Action : continue to promote pre application discussions*

### **Using Planning Performance Agreements.**

**4.7** Performance agreements and their use is kept under review but they are not at present utilised.

*Action: review whether there is scope for performance agreements especially in respect of future very large sites.*

### **Carrying out a new Call for Sites, as part of plan revision.**

**4.8** This process is reviewed above as part of the discussion above regarding SHLAA. The latter is a regular call for sites and is in addition but often parallel to those made during the plan making process. The recent (October 2019) Local Plan issues and Options exercise contained a “call for sites”, a further opportunity to make such representations will be occur following the approval of preferred Local plan options and another at the draft plan stage. Regular calls for sites are essential and all authorities will carry them out. Although the processes are quite complex the use of press adverts and web based information is considered to reach a wide range of potential respondents.

*Action: continue the practice of encouraging suggestions for development sites at all consultation stages.*



## 4 . Actions proposed

**Revising site allocation policies in the development plan, revising existing policies acting as a barrier to delivery, setting out new policies aimed at increasing delivery, or accelerating production of an emerging plan incorporating such policies.**

**4.9** It is essential to have an up to date development plan, and this can be maintained by review and then by anything from complete replacement to more minor revision to policies and or allocations. The process is still long but is one that is continuing in every planning authority. Emerging plans are tied to a series of processes and although stages can be cut prior to their publication, this may come at the risk of (for example) missing an opportunity for the submission of candidate sites. Plans when submitted must be able to be considered sound by those preparing them and this does mean assembling large amounts of evidence which then needs to be considered in relation to the submitted plan.

**4.10** Although a draft plan is just that its status as a development document that reflects the views of the relevant authority can be used to emphasise that draft allocations are considered appropriate and developable by the council. This aspect may be helpful in granting permission in advance of the adoption of a plan and has been used in FoDDC during the gestation of the current AP. Sites in the draft do not have the same status as any in an adopted plan in respect of a calculation of a five year supply and the intention to bring them forward does not make any difference to the existing plan not being regarded as up to date under the regulations. It does however make a practical difference in that the council's in principle support for certain sites is expressed. There may also be issues in respect of the process of being able to object to allocations in a plan but as any development needs to be the subject of a planning application, which can be made at any time during the plan making process, the decision will be made fairly and openly.

*Action: Ensure that sites that are considered suitable for development are promoted as such when the draft LP is published, progress the review of the LP as rapidly as possible.*

**Engaging regularly with key stakeholders to obtain up-to-date information on build-out of current sites, identify any barriers, and discuss how these can be addressed.**

**4.11** An annual survey is conducted in the FoDD seeking information about build out rates and future expectations. This produces a return from active sites and others with and without the benefit of planning permission. The returns are the views of developers, builders and other land owners and their agents and are often qualified by particular constraints that are referred to. They provide a useful check and input to the housing trajectory but need to be considered in context. Nearby potentially competing sites and particular issues that have delayed an application may affect the return and can be a useful marker for action. Returns from larger sites especially where there are several active in one location highlight the market capacity and although this can be examined in this study, it is something that the FoDDC don't control. The market capacity in individual settlements is a consideration for a LP but may not be the overriding one when allocating sites for the long term development of the district and its sustainability.

*Action: continue regular engagement with stakeholders and develop further, especially discussion about impediments to delivery and market "capacity"*

## 4 . Actions proposed

### **Establishing whether certain applications can be prioritised, conditions simplified or their discharge phased on approved sites, and standardised conditions reviewed.**

**4.12** Planning applications are subject to various time limits although there are recognised ways in which time to determine can be extended. It is however necessary to process all applications against the same limits and is not possible to prioritise those that will deliver housing. There are other priorities for the FoDDC and if applications are dealt with on a basis of when they are submitted, then that is considered a fair and transparent approach.

**4.13** Guidelines which govern delivery and the use of pre commencement conditions ensure that these are not incorrectly applied. Inevitably permissions will require conditions to be discharged and some can only be actioned after commencement of a development. The key is that they are effective and do not unnecessarily delay a scheme. They are by definition needed to ensure that development is of an appropriate quality and may be the best way to ensure a permission can be issued and implemented.

*Action: none, unless necessary in response to government requests*

### **Ensuring evidence on a particular site is informed by an understanding of viability.**

**4.14** Additional information currently being gathered on viability will support the LP, inform the decision to adopt or not CIL and show how AH can be delivered. The information will be used in order to support allocations in the forthcoming LP especially to demonstrate that they are likely to be able to be developed in the plan period. This will also assist with judgements about present viability and hence the deliverability of current sites, providing information in respect of s106 contributions and affordable housing delivery that can be supported by the types of sites being considered.

*Action: new sites to be compliant with NPPF regarding viability, further discussion regarding s106 costs in relation to current sites, and ensure any CIL introduction is well within the affordability headroom.*

### **Considering compulsory purchase powers to unlock suitable housing sites.**

**4.15** This is an available power which is kept under review. Though it may deliver a site, the site would then have to be developed which would entail finding / marketing to a willing developer.

*Action: awareness and review*

## 4 . Actions proposed

### **Using Brownfield Registers to grant permission in principle to previously developed land.**

**4.16** Although the principle that previously developed land should be brought forward for development is agreed, and a register of such land is maintained, the effectiveness of Permissions in Principle is far less clear. Previously developed sites in the FoDD often need financial support in order to come forward and actions to provide this are considered the best way to ensure their development. Examples include the Northern Quarter development in Cinderford where a range of initiatives are being employed in order to bring the land to delivery. A permission in principle would not assist in bringing forward sites which enjoy or have previously had outline permission.

*Action: none*

### **Encouraging the development of small sites and higher site densities.**

**4.17** The basis for guidance on densities in the NPPF and in the LP is that they should be appropriate for the site. Development should make good use of the land available. This may mean agreeing lower densities than are physically possible. Ultimately the requirement is to achieve a high quality of development in step with guidance including the national design guidance. Density will be affected by the mix of units on a site but the mix sought would normally be a reflection of several key factors including the possible need for smaller affordable homes, proximity to services and whether the site is within or on the edge of an urban area. The existing LP does not prescribe densities except to guide the numbers located under its policies though it does seek an efficient use of the land concerned.

**4.18** Small sites are a feature of the existing LP and are likely to be so in the successor, and there is also a larger percentage of allocated sites under 1ha than encouraged in guidance. This is a function of the nature of the area and the LP seeking to identify a broad range of opportunities by allocation for development. The LP encourages the development of small unallocated sites in accord with its policies which are based on the principles of sustainable development and relate to the character of the area.

*Action: ensure through planning policies that there will be a potential supply of small sites. Review densities achieved to ensure they are appropriate.*

## 5 . Conclusions

### Summary and Conclusions

**5.1** Delivery of new homes in accord with need is a fundamental requirement of a plan. The FoDD LP supports this and sets out the range of local priorities which accord with those contained in national guidance. The overall aim is to achieve sustainable development of all kinds and meet the needs of the area.

**5.2** The current supply of permissions is sufficient for about 2913 dwellings (31st March 2020). These are the equivalent of about eight years of the annual requirement and cover the number of dwellings which would be required to meet the remainder of the current plan's needs. Although these calculations are simply provided for illustrative purposes, there is not considered to be an overall shortage of sites with permission.

**5.3** This action plan has been prepared in order to satisfy the government requirement to do so when housing delivery is below 95% of the calculated requirement. The actual "shortfall" for 2019 was one where 89% of the calculated need was delivered, and this represents a total delivery over three years of 56 homes below the 95% target. Although the targets change over time the plan is considered to demonstrate how delivery rates will increase and how their increase can be supported. Actual delivery depends on the actions of builders and developers as well as on those of the FoDDC. This is why a range of actions are proposed that improve the conditions to increase housing numbers. The FoDDC's performance in this and future delivery tests depends therefore on continuing efforts to ensure that there are sites that are attractive to develop and that all providers are engaged in the process of bringing them forward. The context of a relatively fragile market at least in some areas and high targets will continue to be a challenge.

**5.4** The current economic and wider environment (early 2020) are such that it is not known what the long term effect of the pandemic will be. There will be a long term impact on the economy, and short term changes are very apparent slowing dwelling construction and the planning process. These impacts will reduce the flow of housing completions and will therefore impact on delivery. It may be that the test need to be modified or suspended although the monitoring of permissions and delivery will continue.

**5.5** In future years the test will become more stringent and especially if the "presumption in favour of sustainable development" were to apply because the 75% target had not been met, the situation would be the same as not having an up to date plan. Sites able to be developed whether allocated or not would be permitted (possibly on appeal). Whilst some of these may be land likely to be allocated in the next some may not be.

### Summary of Actions proposed

**5.6** The following are key actions considered appropriate to maximise housing delivery in the FoDD. Some are new while others represent a continuation of current practice. They are taken from the potential actions above and are provided as a summary of that section.

## 5 . Conclusions

1. Revisiting the Strategic Housing Land Availability Assessment (SHLAA) / Housing and Economic Land Availability Assessment (HELAA) to identify sites potentially suitable and available for housing development, including public sector land and brownfield land.  
*Action: Continue with the annual call for sites (SHLAA) exercise and review sites for potential to become allocations in LP.*
2. Working with developers on the number of houses on site, including whether sites can be subdivided.  
*Action: Continue to discuss site delivery as required. This includes possible sub division.*
3. Offering more pre-application discussions to ensure issues are addressed early.  
*Action : continue to promote pre application discussions*
4. Using Planning Performance Agreements.  
*Action: review whether there is scope for performance agreements especially in respect of future very large sites.*
5. Carrying out a new Call for Sites, as part of plan revision.  
*Action: continue the practice of encouraging suggestions for development sites at all consultation stages.*
6. Revising site allocation policies in the development plan, revising existing policies acting as a barrier to delivery, setting out new policies aimed at increasing delivery, or accelerating production of an emerging plan incorporating such policies.  
*Action: Ensure that sites that are considered suitable for development are promoted as such when the draft LP is published, progress the review of the LP as rapidly as possible.*
7. Engaging regularly with key stakeholders to obtain up-to-date information on build-out of current sites, identify any barriers, and discuss how these can be addressed.  
*Action: Continue regular engagement with stakeholders and develop further, especially discussion about impediments to delivery*
8. Establishing whether certain applications can be prioritised, conditions simplified or their discharge phased on approved sites, and standardised conditions reviewed.  
*Action: none, unless necessary in response to government requests*
9. Ensuring evidence on a particular site is informed by an understanding of viability.  
*Action: new sites to be compliant with NPPF regarding viability, further discussion regarding s106 costs in relation to current sites, and ensure any CIL introduction is well within the affordability headroom.*

## 5 . Conclusions

10. Considering compulsory purchase powers to unlock suitable housing sites.

*Action: awareness and review*

11. Using Brownfield Registers to grant permission in principle to previously developed land.

*Action: none*

12. Encouraging the development of small sites and higher site densities.

*Action: ensure through planning policies that there will be a potential supply of small sites.  
Review densities achieved to ensure they are appropriate*

## Appendix 1 . Housing Trajectory and Housing Trajectory Note 2020



2020/21 trajectory for five year supply															Forest of Dean District														
This table updated July 2020																													
Settlement	AP	Address and planning ref no.	Capacity	supply	completions										year		delivery summary		to2026	comments updated to July 2020									
					2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30			2030/31	5yr	6-10yr	10 yr					
Alvington	AP1	Alvington Clans Lane 1494/15, 1772/18 RM.	11	11														6	5			11	0	11	11	Allocated site RM approved April 2019 awaiting commencement			
Bream	AP3	Bream Byelands Rd (Woodside) 0546/13, P0422/18/FUL	9	8																			0	8	8	9 allocated site revised full permission July 2018 following earlier consent.			
	AP3	Bream additional land at Byelands Rd/Whittington Way	5	5																			0	5	5	5 allocated in AP - small site owned by FoDC, adjoints consented 04/22/18 above			
	AP2	Bream New Rd/High St (RJC) site 1082/14, 1217/19	14	14																			0	14	14	14 allocated first in AP has had outline pp. Now subject of new application/ negotiation			
	AP2	Bream New Rd/High Street 0636/15, 1736/17.	9	9																			0	9	9	0 allocated in AP 9 dwellings now complete			
Cinderford	n/a	Cinderford 52 Russpidge Rd 2461/11 1720/16.	8	8																			0	8	8	8 no progress previous permission lapsed			
	n/a	Cinderford 97 St Whites Rd Cinderford Bridge 0125/08	0	0																			0	0	0	0 not counted no recent progress site in use as garage			
	n/a	Cinderford Adj Bristol House 73 Church Rd 1286/13	0	0																			0	0	0	0 no progress site not included			
	AP34	Cinderford Football Club Causeway Rd.	80	80																			0	80	80	40 revised scheme at pre application stage but viability issues if linked to football club			
	AAP	Cinderford HQ AAP Newelton Rd site	40	0																			0	0	0	0 allocated in AAP demolition complete no application			
	AP3	Cinderford Railway Tavern Station St. 0509/16/ful 1539/19 revision.	10	10																			0	10	10	10 valid permission, further discons 71/18 and 35/18. revision approved Jan 2020			
	n/a	Cinderford St Whites Farm Sneyd Wood Rd 0558/11	60	60																			0	60	60	60 available - part covered by unimplemented (valid) consent early pre application stage			
	n/a	Cinderford St Whites Rd Peacock Lane Russpidge 0678/13.	16	16																			0	16	16	16 full permission for 8 units by conversion			
	AP33	Cinderford Station St Canopy Foundry 0539/08	30	30																			0	30	30	30 site available - within plan allocation			
	AP33	Cinderford Station St former Listers (Rothbean) 1590/04	100	100																			0	100	100	50 site available - within plan allocation			
	AP33	Cinderford Station St Turley Ct and Wilce land 0885/10	20	20																			0	20	20	20 site available - within plan allocation			
	AP37	Cinderford Valley Road former Engleghards 1175/18 0577/20	45	45																			0	45	45	45 mixed allocation, GP unit under construction remainder at outline application			
	n/a	Cinderford St Whites former school consent 1480/19	15	15																			0	15	15	15 full permission for 8 units by conversion			
	AP35	Cinderford Sneyd Wood Rd North.	18	18																			0	18	18	18 AP allocation at early pre application stage			
	n/a	Cinderford Russpidge former baths 0011/18	22	0																			0	0	0	0 not now to be allocated current application for 22 P0011/18 withdrawn status is OFC			
	n/a	Cinderford 17 Foundry Road	8	8																			0	0	0	0 complete			
Coleford	AP59	Coleford former Dukes Travel Lakers Rd Berry Hill 1002/17	7	7																			0	0	0	0 complete			
	AP58	Coleford former Kings Head application 1266/16.	8	8																			0	8	8	8 has permission for new build - foundations in place available and deliverable but no activity			
	AP56	Coleford Lanestone Rise High St 0067/18	10	10																			0	10	10	0 all completed 2019			
	n/a	Coleford Newland St former WCs 0285/16	8	8																			0	8	8	8 has permission for new build - foundations in place available and deliverable but no activity			
	n/a	Coleford Owen Farm Shanton Rd 1167/13	158	80																			0	158	80	0 final phase completed by June 2018			
	AP3	Coleford Poolway Farm Gloucester Rd.	140	140																			0	140	140	140 allocated site at pre application stage			
	AP64	Coleford Millwall Elwood Rd	48	48																			0	48	48	48 allocated site at pre application stage with developer			
	AP66	Coleford Kings Meade addition	48	48																			0	48	48	48 allocated site at pre application stage			
	AP65	Coleford North Road Worcester Walk Broadwell 0635/19	70	70																			0	70	70	70 allocated site at application stage - phase 1			
	AP61	Coleford Ex Sonico Tuffton Avenue P0912/16/OUT, 2002/18RM.	65	65																			0	65	65	65 demolition complete - rm approved under construction			
	n/a	Coleford Lower lane Berry Hill 1483/14 (appeal) and 1547/19.	180	180																			0	180	180	180 new appeal decision April 2018. RM approved and discons, site works commenced			
Drybrook	AP85	Drybrook Farm Drybrook Rd 1753/12	17	17																			0	17	17	17 proposed AP allocation revised scheme at pre app stage, has had outline PP			
	AP84	Drybrook High Street	50	50																			0	50	50	50 proposed allocation in AP revised scheme at pre app stage			
	AP84	Drybrook High St. adj RHC1729/16, 0457/20 application for RM	57	57																			0	57	57	57 outline permission and RM application submitted			
	n/a	Drybrook Nelson arms	6	6																			0	0	0	0 completed 2016/17			
Hartpury	AP36	Hartpury adj Village Hall Over Old Rd. 0284/19	11	11																			0	11	11	11 AP allocation - resolved to permit full app but refused due to S106 ownership issues			
Huntley	AP87	Huntley adj The Poplars Tiberton application 0946/20 outline	12	12																			0	12	12	12 AP allocation outline application submitted			
Littledean	AP88	Littledean Beech Way 0899/14 0992/16 app.	17	17																			0	17	17	17 AP allocation full permission current app to discharge conditions technical start Nov 2018			
Longhope	AP89	Longhope Church Road 1975/11, 0471/17 full permission Sept. 2019.	24	23																			0	23	23	23 revised full permission for 23 and discons 1637/19			
	n/a	Longhope The Wood 284 1888/14	16	16																			0	16	16	16 full permission for affordable housing but lapsed			
Lydbrook	AP92	Lydbrook former Rothden timplat wks 1303/13 1165/17 RM	26	26																			0	26	26	26 AP allocation current RM appn following outline pp delayed			
Lydney	AP47	Lydney East "Lalington" land adj Naas lane & Bysses.	80	80																			0	80	80	80 allocated but likely to be later phase of AP47			
	AP47	Lydney East (east of Dalkeith) 1881/15 1399/18	347	347																			0	347	347	347 under construction approval for 347 dwellings			
	AP47	Lydney East Phase A (RH site) 0412/13, 0745/18	320	300																			0	300	300	300 allocated and with outline consent, revised outline application submitted			
	AP47	Lydney East Phase B (RH site) 0361/15 Redrow 0076/17.	125	125																			0	125	125	125 under construction or completed (125)			
	AP47	Lydney east Phase B (Belway) 0835/17.	90	90																			0	90	90	12 under construction or completed (90)			
	AP47	Lydney East Phase B remainder	283	260																			0	260	260	50 allocated site, some road part complete OJ consent, total capacity of this area 283 approx			
	AP47	Lydney Highfield Rd rear T & T 1829/13, 0308/17 0370/19	177	177																			0	177	177	106 under construction some now complete revised total now 177			
	AP53	Lydney Holms Farm 1255/06, 1889/15.	28	28																			0	28	28	28 allocation 2005 LP and AP, full permission subject to S106 21/1/20			
	AP54	Lydney Augustus Way Allston 1284/13, 1591/18APP	200	200																			0	200	200	120 o/f for 200 phase 1 RM app submitted.			
	AP47	Lydney 33 High Street 1055/18.	9	9																			0	9	9	9 full consent and subsequent approvals			
	AP47	Lydney B part 0258/20 (Barratt David Wilson)	40	40																			0	40	40	40 phase formerly within Lydney B now separate RM application			
	AP47	Lydney B part 1953/19 (Crest)	148	148																			0	148	148	148 phase formerly within Lydney B now separate RM application			
	AP47	Lydney B part 0260/20 approved (Barratt David Wilson)	64	64																			0	64	64	64 phase formerly within Lydney B now separate RM permission			
Mitcheldean	AP95	Mitcheldean Former coach depot St Michaels Close	12	12																			0	12	12	12 AP allocation no current permission			
	AP96	Mitcheldean former George Hotel 1849/14 1106/18 RM appn.	20	31																			0	31	31	31 AP allocation OJ/L permission - RM application approved February 2019			
	n/a	Mitcheldean Glass Rd 0086/09	56	7																			0	0	0	0 all complete			
	AP94	Mitcheldean Bradley Court Rd (Vantage Point)	40	40																			0	40	40	0 proposed AP allocation not counted in five year supply - no progress			
Newent	AP76	Newent Ross Rd mixed development site 0855/19 o/f	30	30																			0	30	30	30 mixed allocation in AP recent outline application refused for part of site			
	AP77	Newent Ross Rd (Bellway) Honefair Lane RM approved 0328/18	80	81																			0	81	81	81 under construction likely completion 2020/21			
	AP74	Newent Former Nursery Southern Lane 1877/13, 0047/16, 0981/19 s106 due	36	36																			0	36	36	36 AP allocation, 36 units have full permission June 2020			
	AP73	Newent Watery Lane 1513/13, 1915/15 revised scheme at pre app	30	30																			0	30	30	30 AP allocation reserved matters approved now with revised scheme at pre app stage			
	AP75	Newent Southern Lane North 1320/18, 0041/20RM approved	230	230																			0	230	230	230 allocated in AP, outline permission up to 230, RM approved			
	AP76	Newent Cleve Mill Lane Gloucester Rd	45	45																			0	45	45	45 AP allocated site			
	n/a	Newent Glebe Chapel 1746/17 0039/19.	8	8																			0	8	8	8 current revision for one unit full permission OJ/C			
Newnham																													



## Appendix 1 . Housing Trajectory and Housing Trajectory Note 2020

**Housing Trajectory, Forest of Dean District Council, published July 2020**

The accompanying table is the trajectory for 2020 taking account of the completions recorded up to April 1 2020. During the year 2019/20 336 net completions were recorded against a plan requirement of 330. This figure (336) is an increase from the previous year of 24% from 270. It is in effect accounted for by an increase in completions at Lydney from 107 to 151 and at Newent from 5 to 41. Elsewhere in the district completion rates on what were mainly smaller sites were broadly similar to the previous year although site visits to some could not take place.

Further analysis will be published including a Housing Action Plan, required as a result of the 2018/19 housing delivery test, and a delivery note. The review of the Local plan will also lead to the publication of information relevant to housing delivery including a full Local Housing Needs Assessment, viability studies and material in support of the plan's development.

FoDDC July 2020

The following tables are taken from the trajectory.

<b>five year land supply pre 2019 NPPF calculation as in Allocations Plan</b>	<b>L'pool</b>	<b>Sedgefield</b>
years to end of plan 2020-26 is 6		
time to address backlog	to 2026	5yr
annualised OAN	330	330
supply total in five years	3135	3135
completions reqd since 2006	4620	4620
backlog @ 2006-date	732	732
actual completions 2006/7- 2019/20	3888	3888
requirement for 20yr from 2006/7	6600	6600
total req 5yrs with backlog 2006/7 and 20% buffer	2712	2858
<b>years supply for current LP</b>	<b>5.78</b>	<b>5.48</b>
Number of dwellings required to be facilitated per year for five yr supply	542	572

<b>Supply using standard method</b>	<b>new</b>
annual requirement standard method	371
Buffer, for example 20%	1.2
annual equivalent (371* 1.2)	444.5
five year required	2226
five year available/ deliverable	3135
years supply for new standard method	7.04

## Appendix 1 . Housing Trajectory and Housing Trajectory Note 2020

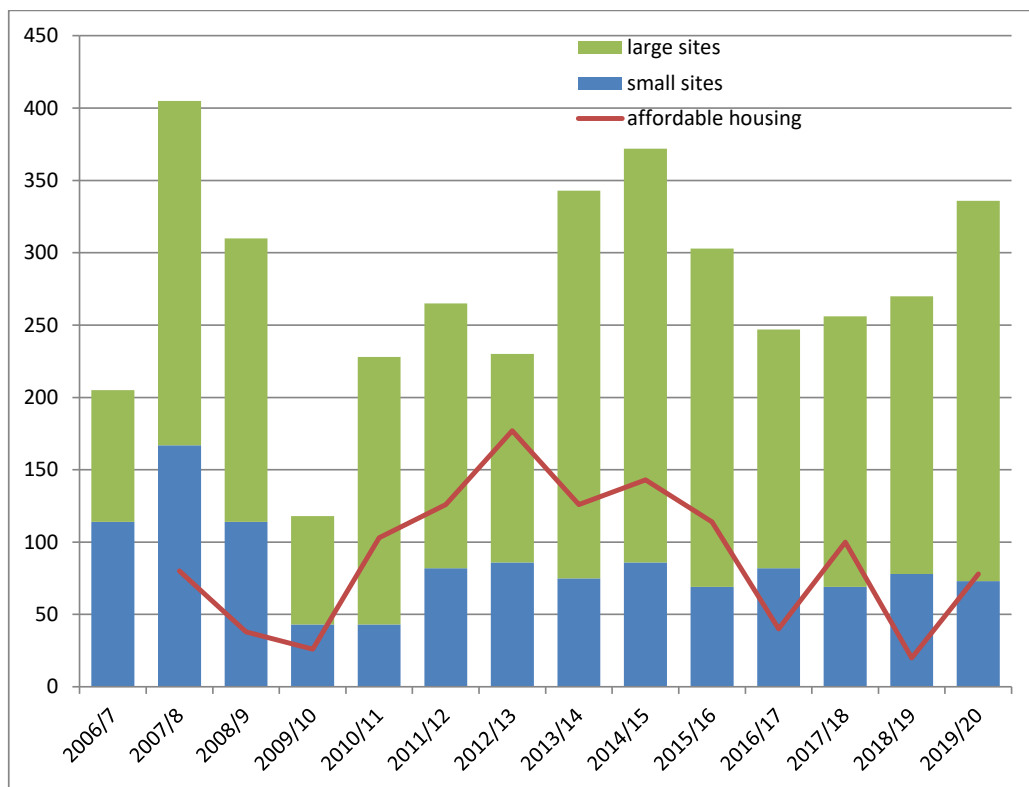
**Summary of completions**

year	Total (net)	Small sites	Large sites
2006/7	205	114	91
2007/8	405	167	238
2008/9	310	114	196
2009/10	118	43	75
2010/11	228	43	185
2011/12	265	82	183
2012/13	230	86	144
2013/14	343	75	268
2014/15	372	86	286
2015/16	303	69	234
2016/17	247	82	165
2017/18	256	69	187
2018/19	270	78	192
2019/20	336	73	263
total	3888	1181	2707

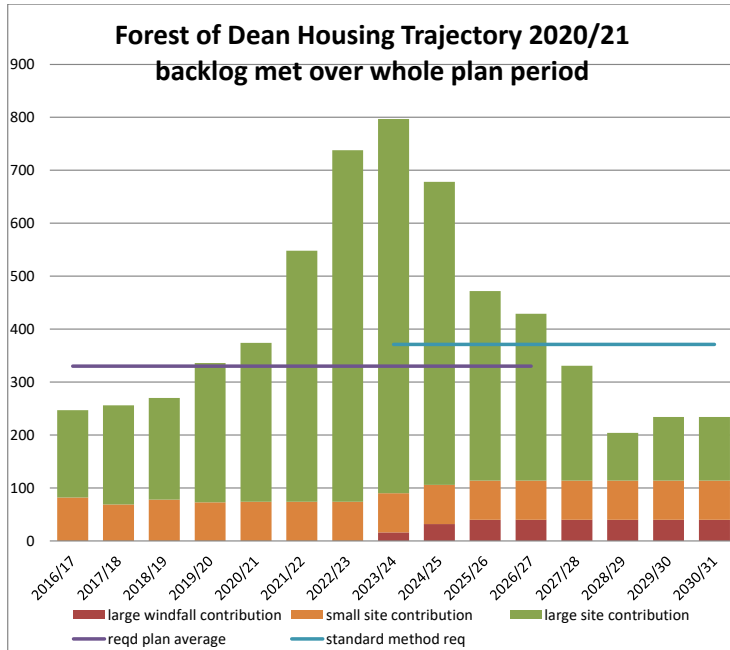
Large sites: more than 5 net dwellings.

# Appendix 1 . Housing Trajectory and Housing Trajectory Note 2020

## Past completions FODD



Appendix 1 . Housing Trajectory and Housing Trajectory Note 2020



<https://www.fdean.gov.uk/planning-and-building/planning-policy/local-plan-supporting-information/>

## Appendix 2 . Housing Delivery Test: 2019 Measurement Technical note

## Appendix 2 . Housing Delivery Test: 2019 Measurement Technical note

The Housing Delivery Test is an annual measurement of housing delivery in the area of relevant plan-making authorities. This is accompanied by a technical note on the process used in its calculation. Further information can be found using the following link <https://www.gov.uk/government/publications/housing-delivery-test-2019-measurement>



