Housing Delivery Forest of Dean district 2018/19

Contents

1 introduction

1.1 This report summarises the current housing supply and delivery in the Forest of Dean district for 2018/19. The majority of that period was covered by the newly adopted Allocations Plan (AP) adopted in June 2018 and the benchmark against which the delivery of housing is assessed is that used in the adopted plan as recommended by the examination. Many of the allocated sites are based on the Core Strategy (CS) and some date from the previous Local Plan but all were re assessed and supplemented by new allocations where necessary during the compilation and examination of the AP.

1.2 Whilst delivery is assessed against the requirements of the AP some of the sites it allocates are newly confirmed and their contribution may be later in the plan period. Others are in the process of being developed or have permission while some may be expected to deliver in the longer term and are being targeted in order to bring them forward.

1.3 Overall the availability of land for future housebuilding is at a high level and many of the large sites are active, though this does vary through the FoDD. Land at Newent and Lydney is under development or in the process of coming forward whilst activity in Cinderford is slow, indicating the need for intervention and/ or subsidy. Small sites throughout are continuing to be developed and contributions from other windfall sources remain at the expected levels.

1.4 The delivery of new dwellings has remained at a broadly consistent level over the last three years, at a level which coincides with the ONS expected trend based rate. This is lower than the AP requirement or the level that the revised NPPF "standard" calculation would suggest is needed. The latter figure increases from the NPPF projection because of the additional calculation that arises from the application of the measure of affordability, and the former because of the additional allowances that were applied at the time of the AP examination. These adjustments are intended to achieve an increased delivery but without a market response and also provision of affordable housing it appears at present to be unlikely to be realised.

1.5 Under the AP calculation, meeting the backlog over the remaining plan period the current five year supply is sufficient for 6.19 years. This equated to land for about 3233 dwellings and includes a 20% buffer added to the net supply and the backlog. Land is available to meet well in excess of the needs of the AP over the remaining plan period which is until 2026.

2 delivery of housing 2018/19

2.1 The total number of completions recorded in 2018/19 was 270, which is a figure close to the average for the plan period from 2006. It is a slight increase since the previous year and is derived from small sites and other windfalls contributing as expected together with larger sites. The AP brought forward a range of new allocations which are now beginning to contribute in larger numbers. Now that there is an adopted plan there is greater certainty in respect of allocated sites and once identified these sites are coming forward. There is always a lead time and that is reflected both in the supply of completed dwellings and in the estimates of future yield. One other consideration is that of the market and the number of sales that it will support in a given year. In locations such as Lydney this will probably restrain the actual delivery of new homes, rather than the supply of sites and permissions.

Large Sites

2.2 During 2018/19 the sites concerned delivered about 165 dwellings on nine sites. Three of these are within the major allocation at Lydney east, each being a different housebuilder active within that area. Two sites are active sites at Tutshill (again regional/ national volume builders and one at Newent (likewise). One further site at Coleford recorded the completion of a scheme of 156 units.

larger windfall sites

2.3 Larger windfall sites will still contribute new dwellings, and an assumption will need to be made in the plan for these. They are sites that were not allocated in a plan at the time they received permission so only count in the estimation of supply. Large sites not allocated at the time of their original permission contributed about 68 dwellings in 2018/19.

Small sites

2.4 Small sites contributed 78 units in 2018/19, compared with an average assumed for future years of 74. These are a mixture of new builds and conversions and include units delivered via the prior approval route where certain changes of use are permitted, for example from agricultural buildings to dwellings. Although there are some issues about the product and also the principle of these processes, they do make an additional contribution to supply.

3 land supply large sites

3.1 There are a variety of large sites (defined as those supplying a total of more than five dwellings net) with either planning permission or allocated in a plan. These had a total capacity of 4764 including completed dwellings though not all of the spare capacity is considered to be available within five years or inside the plan period. If completions are deducted and capacity up to 2026 is considered then there is scope for about 3588 dwellings to be provided. Annex "a" contains a schedule of these sites and the short titles used below are used in that table.

3.2 Information considered in assessing each site includes that available from planning applications and consultations during the allocation (plan making) process, the annual return of owners or agents when their views are sought as to the delivery of their sites, and the consideration of the market (for example the ability of a particular settlement to deliver and how that may affect the delivery from a number of sites. Another consideration in relation to that of market capacity is that of the number of affordable homes to be delivered as these do not rely on being sold in an open market.

3.3 The supply of land from allocated sites is drawn from newly allocated land, land that has not been allocated and land that was allocated in a previous plan but has not yet been developed. These sources cover the land that is held to be immediately available but future windfall (unforeseen sites) will add to the total supply. These can only be estimated and their future contribution is reviewed in the section below. The large sites that can at present be identified (those with permission or allocated in a plan) are considered in greater detail by location:

3.4 Lydney The largest single housing allocation in the FoDD is at Lydney which together with other smaller identified sites in the town means that there are about 1550 dwellings on allocated sites that had not been delivered at 31st March 2019. These are divided between six separate elements which either have current applications or permissions. Four major housebuilders are currently on site in Lydney building and selling new dwellings.

3.5 The largest site is one for 347 dwellings now under construction but which did not record any completions during 2018/19 (Persimmon). It is expected to be developed over the next nine or 10 years, though it could be developed more quickly. At present about 190 of the total number of dwellings is counted as within the five year supply. The developer return in 2019 did indicate that all of the site could be delivered inside five years but unless or until there is evidence to this effect this study limits the number of completions in the light of the other active sites and the anticipated limits of the local market.

3.6 Three further parts of the major east of Lydney allocation are under construction (Redrow, Bellway and Edenstone providing 125, 90 and 177 dwellings respectively) All are considered able to deliver to the full extent of their relevant permissions within five years. 2018/19 was the first year all three delivered completions. At the same time that these will be completed additional elements of the major site are expected to be commenced in broad accord with the agreed phasing and infrastructure consents. Strategic infrastructure is in place and this will allow continuity especially within the area which is known as "Lydney B". The remainder of the allocation which has not yet commenced is split between an area ("Lydney A") which has had outline permission and is presently the subject of a revised application and land adjoining the Persimmon site referred to above which is considered to have a capacity of about 80 but has not yet been the subject of an application.

3.7 In addition to the east of Lydney development, a site for up to 200 dwellings (Augustus Way/ Allaston) is currently seeking reserved matters approval for its first phase and is expected to be developed at the same time though possibly over a longer period. One remaining site is covered by an application at an advanced stage (Holms Farm) on which about 27 dwellings are expected to be built.

3.8 Overall the current provision is that Lydney is considered to supply about 773 deliverable units within five years and there are a further 787 available within the next five year period. This assumption suggests over 400 (437) of the present commitments would be delivered beyond the current plan period but within 10 years. Given the scale of some of the allocations however it is expected that the total commitments will not be built for over 10 years.

Cinderford

3.9 In Cinderford there are identified housing sites considered able to provide approximately 616 dwellings over the next 10 years. These are divided between about 393 deliverable within the first five year period and 223 over the next. The sites are made up of some not previously allocated but now permitted, some which have been identified in the AP and those in the 2012 Area Action Plan (AAP).

3.10 The Cinderford Northern Quarter Area Action Plan was adopted in 2012 as a masterplan for the regeneration area of proposed mixed uses identified north and west of the main town. The main area identified for mixed development has the benefit of a planning permission which includes a new college (completed), a spine road (phase 1 completed) and up to 195 dwellings (Cinderford Northern Quarter). The permission is a hybrid so the housing element can be regarded as having a valid outline consent while other elements had detailed permission and have been completed. The remaining development sites are owned by the FoDDC and a proportion (120 units) is expected to be developed within five years. The balance is available and is expected to be completed before 2026. Employment space and an hotel are also part of the hybrid permission. There is one additional housing allocation within the AAP (Newtown Road), and this site does not have permission. It is owned by Homes England who are in the process of marketing it. The site is considered capable of accommodating about 50 units from new build and conversion. Given the ownership and HE's remit it is considered that the site is deliverable, possibly by a registered housing provider.

3.11 Outside the Northern Quarter there is a mixture of sites, some with permission and some which are allocated and do not have a valid permission. These include some on previously developed land and some on greenfield. Sites in Cinderford are in some instances less attractive for development than in some areas of the district and the previously developed sites may bring additional challenges. The Council are working with Homes England and with registered providers in order to increase housing delivery in the town.

3.12 The main sites in Cinderford not part of the Northern Quarter include some which are deliverable and available now and others which are likely to be developed over a longer timescale. The availability and expected delivery from these is set out in the attached schedule. Those that are available now are not assumed to provide any completed dwellings until 2021/22 and others much later or beyond the current plan period.

Coleford

3.13 In Coleford there are six allocated sites with permission and three allocations that are at the pre application stage. Three smaller sites are under construction although the smallest of these is currently inactive. The largest site in Coleford is at Berry Hill (up to 180 dwellings) and a reserved matters application is currently awaiting a decision following an outline permission in 2018. Land at Tufthorn Avenue is due to commence development very shortly and the site at Broadwell allocated in the AP is the subject of a current outline application. The three remaining allocation sites in the AP are at the pre application stage, each having been supported through the AP examination and subsequently.

Newent

3.14 Of the seven large sites at Newent, one (Ross Rd) is active having commenced in 2018/19. The site at Southend Lane north for up to 230 dwellings received outline permission in July 2019 and land at Watery Lane and Southend Nurseries has had a valid permission. A revised scheme is currently being considered for the latter, in the form of a new application and the Watery Lane site is the subject of current discussions. A fifth site is an opportunity for housing and additional recreation, another an infill redevelopment of a former chapel and the final one is a mixed site including redevelopment opportunities that will allow additional housing.

3 . land supply large sites

Tutshill and Sedbury

3.15 After the four towns the largest settlement in the FoDD is Tutshill/ Sedbury which adjoins Chepstow. There are three main (active) housing sites. Together these will deliver about 246 new dwellings and all are expected to be completed within five years.

Villages

3.16 The AP identifies land in some of the larger villages for new housing. In addition there are some sites that originated as windfalls which now have permission. Most of the village sites that feature in the housing supply information are in the largest of the villages. The largest are in Newnham and Drybrook, which can provide for 80 and 110 dwellings respectively. The former is awaiting the finalisation of the S106 agreement before the full permission is issued to the developer. The site at Drybrook divides into two, one half of which has a valid permission (outline).

3.17 The remaining village sites are considered in the attached schedule, some have permission and others are at the application or pre application stage and two are presently under construction.

3.18
The above summary table is not a complete representation of the likely delivery at the settlements concerned but is a representation of the capabilities of the current sites as assessed in 2019. Most of the windfall allowance and much of the small sites allowance will result in the delivery of additional dwellings in the above settlements.

Table of housing sites by settlement (site over 5 dwellings only) availability updated October 2019

LOCATION	Number of sites assessed	DELIVERY TO 2023/ 24	DELIVERY (AVAILABLE) 2028/ 29
Cinderford	15	393	616
Coleford	9	466	581
Lydney	9	773	1560
Newent	7	352	452
Alvington	1	11	11
Bream	3	21	21
Drybrook	3	124	124

3 . land supply large sites

Hartpury	1	11	11
Huntley	1	12	12
Littledean	1	17	17
Longhope	2	39	39
Lydbrook	1	26	26
Mitcheldean	3	43	83
Newnham	2	100	100
Redmarley	1	11	11
Sedbury Tutshill	5	238	238
Sling	1	20	20
Staunton Corse	2	54	54
Whitecroft	1	30	30
Woolaston	2	48	48
	70	2789	4054

4 land supply windfall and small sites

4.1 Larger windfall sites will still contribute new dwellings, and an assumption will need to be made in the plan to allow for these. They are sites that were not allocated in a plan at the time they received permission. They therefore include both policy compliant unforeseen sites and those that may not comply with the local policies of the time but are given permission on appeal. The contribution from these sources will fluctuate, but over the last 10 years (2008/9-2017/18) the contribution from these sources was about 46% of the total from large sites (those over 5 dwellings net) or an annual average of 93 units pa against 110 from allocated sites. As more allocated sites are implemented this percentage may change but the expectation is that there will continue to be a significant supply. Sites from this source are counted in the overall supply and are assessed individually once they receive planning permission. Until that time however an allowance needs to be made on the basis that although they cannot be specifically identified they will continue to come forward. In order to do this in the past an average contribution of 81 units per year was used. As it is unlikely that such sites will provide completed units in the first year, no allowance was included in the trajectory nor is there any allowance for the second year. Thereafter an allowance was made on a sliding scale for 16, 31, 49, 65 and then 81 units per year. For each year after this an allowance of 81 pa was used. It is therefore only at year seven when the full allowance is added to the supply. Until then the allowance is 0, then again 0 and after that approximately 20, 40,60,and 80% of the calculated average annual contribution. This approach avoids any double counting but also takes account for the fact that sites which are neither allocations nor have planning permission will continue to add to housing supply.

4.2 It is reasonable to assume that small sites and windfalls will continue to provide completed dwellings. At the current rates this could add in the region of 1480 from small sites and up to 1200 from non allocated sites over a 20 year period (taken as 2021-41). These figures assume that small sites (1-5 net increase in dwellings) will add about 74 per year. The rate during the present plan period has averaged 92pa but since 2010/11 has fallen to just over 70pa having seen a dip during and immediately after the recent recession. The evidence therefore is that the average contribution of about 74 pa is still a reasonable figure and is likely to be a conservative estimate

4.3 An alternative method for estimating the likely yield from small sites would be to look at the permissions and make an assumption about their yield based on implementation rates. When this has been applied in the past, it has been assumed that all houses under construction will be completed but that only 60% of those with permission (but not under construction) will be completed. This method could be varied, for example to discount outline permissions but to assume that those with detailed approval would all or almost all be implemented. Given the "bank" of permissions at present there would appear sufficient to support the 74pa used in the

4 . land supply windfall and small sites

trend based assumption and potentially a figure in excess. One source of permissions and new dwellings is from prior approvals and another from conversions. They come from the direct application of government policy, not through any local plan.

5 commentary

5.1 The above assessment is based on the sites currently allocated and with permission within the FoDD. The supply identified is considered ample to ensure that land is available and deliverable over the five year period to 2023/24 and also to the end of the current plan period (2026) and beyond. The Plan is at the early stages of a review and the need as well as the future supply will be recalculated with new allocations and policies to serve the new LP as necessary. The plan period is until 2041 and the current intention is to identify sufficient land in the document to demonstrate that there is an adequate supply with allocations being made that cover the entire plan period. Indications are that the rate of delivery to be supported would be higher than the current 330pa but overall the five year supply requirement and that for a longer period may mean providing a similar scale of allocations to that held in the current AP once existing commitments and likely windfalls including the contribution of small sites has been taken into account.

5.2 At the time of the AP examination a fully revised and NPPF compliant exercise was conducted to provide an up to date objectively assessed need figure for new housing. Following further consideration during the examination the original figure was revised and additional sites were brought into the plan via a series of main modifications. These raised the level of availability in keeping with the OAN figure considered appropriate by the Inspector and provided a supply which addressed the then backlog over the plan period from 2006. This followed the inspector's recommendation that it could be addressed over the entire remaining plan period.

5.3 The AP figure does take account of the possible need to provide additional housing for new employment although at the time of the assessment there was a range considered from no requirement for additional housing to one of an additional 400 over the plan period which added 20pa to the ONS figure of 280. In addition to this provision the AP figure raised the provision by an additional 10% in accord with the Inspector's recommended lift to help provide additional affordable housing. this leads to the current base figure of 330pa.

5.4 To the requirement for the AP set at 330pa a 20% buffer is applied after the backlog to be met over the entire remaining plan period. This means that the identifiable supply of 3225 and the five year need for 2613 delivers a 6.19 year supply.

5.5 For the five year supply:

- Total available on identified large sites- 2797
- windfall- 97 (16+32+49)
- small sites 370 (74* 5)
- total 3264
- Requirement ((330* 5+(738/7*5)))*1.2= 2613, This being the basic annual requirement plus five years' worth of the annual sum needed to meet the backlog when spread over seven years all multiplied by 1.2 to add the 20% buffer.

5 . commentary

5.6 The availability of sites is assessed in a variety of ways, small sites and windfalls are counted in a manner that examines past trends and allowances are then included. Large sites are individually assessed with inputs from the owners/ agents and using the guidance from the NPPF and National Planning Guidance. The test is whether sites have a realistic prospect of delivery (NPPF Glossary) which means that they must be available. Sites within the five year supply should be available at the time they are assessed.

5.7 Sites that are not presently known will contribute over the plan period. These (windfalls) are referred to in the current NPPF as they were in the 2012 version. The contribution has been included as above and such permissions continue to come forward. It is likely that with the current policy context that there will be increased pressure for housing and therefore the supply may increase. No allowance has been made for either an increase or decrease at present but the rate of supply will continue to be monitored. this applies both to the supply of sites that when permitted would be listed individually or small sites of five dwellings or less. As has been suggested above the supply of smaller sites particularly from conversions including from the prior approval process is expected to increase. For the present the historic rate of 74 completions per year on such sites is being retained.

5.8 Past completions have been referred to above, and have averaged 273pa. The table below shows the totals recorded by size of site and for example shows the average completions on smaller sites to be 79, slightly in excess of the assumed rate. Total completions are at a level very similar to the annual need established by the current (2016) ONS figures, the significance of this being that the current and past delivery by the industry is approximately in tune with the ONS forecast level. The current LP seeks to provide for a figure 20% above (330pa) and the new standard assessment (372pa) 36% above.

Table of Completions FoDD for this plan period

	Total net completions in year	small site total (1-5net)	large site total (6+)
2006/ 07	205	114	91
2007/ 08	405	167	238
2008/09	310	114	196
2009/ 10	118	43	75
2010/ 11	228	43	185
2011/ 12	265	82	183
2012/ 13	230	86	144

5 . commentary

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
total	3552	1108	2444

5.9 The annex to this document comprises the housing trajectory for the year 2018/ 19 for the FoDD, with the full details of each site including an update on the current (September 2019) status and the delivery over five and 10 years that each is considered to be capable of. A summary of the delivery that is supported by the named sites and the windfall and small site allowances id provided below:

Table summarising five year land supply

	backlog met by 2026	backlog met over five years
Annualised OAN	330	330
supply total in five years	3264	3264
completions required at 330pa	4290	4290
backlog 2006/07-2018/19	738	738
requirement for five years	2613	2866
years' supply	6.25	5.70
number required for supply	523	573
actual completions 2006-2019	3552	3552

5.10 An important element of the delivery of new housing is the numbers of affordable housing delivered. This is the number of new units and reflect both the general level of housing activity and the delivery that has been negotiated on the sites that are active.

Summary of Affordable housing delivery FoDD

5 . commentary

AH delivery	
Year	
2007/08	80
2008/09	38
2009/10	26
2010/11	103
2011/12	126
2012/13	177
2013/14	126
2014/15	143
2015/16	114
2016/17	40
2017/18	100
2018/19	20