

Housing Land Supply Update Keynote

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1. April 2015 (housing completions to March 2014)

Introduction

1.1 This document should be read in conjunction with other evidence submitted by the Council, especially that relating to the OAN and overall derivation of housing need. It covers matters related to housing needs and the requirement and provision of land. There is particular reference to the five year land supply and the document provides a range of figures which show that there is currently sufficient land to meet this requirement within the Forest of Dean (FoD).

Housing land Supply

Background

1.2 The current position regarding housing land supply in the FoD is set out below. The information relates to March 2015, but does not include completions for the year 2014/ 15. Partly because of this it is clear that the situation in respect of the availability of land for housing is subject to change and it will be updated accordingly. A revised document updating the land supply and completions will be prepared to accompany the Allocations plan when it is submitted. This will include information for the year ending 31st March 2015. The availability of sites changes over time with the granting of permissions and especially as plans progress. Updates are necessary to take account of these changes and to review the status of permissions and building progress on the sites themselves.

Plan Context

1.3 The current adopted plan is the Core Strategy (CS) adopted in February 2012. As part of that plan the site specific allocations from the 2005 Local Plan were retained and where these have yet to be implemented and are still considered to be available for development they are included in both the AP and in the assessment of land supply. Also included in the assessment are sites that are new to the emerging AP and which are therefore not allocated in an Adopted Plan. Sites with planning permission or those regarded as otherwise able to contribute are also considered. These include sites where permissions have lapsed, small sites (net capacity 1-5) which are not individually assessed and a small addition for windfall, which in this case are unidentified sites with a capacity of more than five dwellings (net).

1.4 The Allocations Plan (AP) was published in a draft pre- publication form in July 2014 and an 8 week consultation was conducted. The results of this have been considered and the Plan was published on 25 March being available for comment until 20th May. Submission for Examination is expected in the July. As a result of the publication of the Plan, it is taken into account in this assessment of supply. Paragraph 216 of the NPPF makes clear that some weight can be given to emerging plans appropriate to the stage that they have reached. The extent of unresolved objections must also be considered and so must the degree of consistency between the emerging plan and the NPPF. The AP is required to be consistent with the NPPF and the Council consider it is. It would not be capable of passing examination if this were not the case. Although there may be some debate regarding the basis on which the updated provision for housing is proposed it is considered that the AP makes appropriate provision. There are some other outstanding objections which were not resolved by changes made between the draft and the publication versions of the AP but these are not fundamental.

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1.5 The AP takes account of a revised and up to date assessment of housing need and makes provision accordingly. It allocates sites for housing as a result of this review of need and the re assessment of the suitability of the sites themselves. Some allocated in the AP are held over from the previous Local Plan and these have been re assessed. New sites are included and some have been dropped. Of the former, several now have planning permission (land at Whitecroft (Former Vencil Resil) and Watery Lane Newent for example). Sites that have been deleted as allocations and are not expected to be developed for housing include land at Nailbridge, and Valley Road (North), Cinderford.

Update of requirements (Need)

1.6 As part of the plan making exercise a full review of the need for housing has been undertaken. This is supported by an independent study which considers the requirements in the district from 2011-2031. It follows the guidance contained in the NPPG and concludes that there should be a small increase in the needs which are planned for. It also concludes that the situation must be reviewed regularly and especially in respect of changes that may occur later in the period 2011-31. Further material will be published alongside the AP. The Council's stance in respect of the review is summarised in the paper "Review of Objectively Assessed Need".

1.7 Approval of the AP for publication was given by members on 26th February 2015, at the Council meeting. This approval increased the weight that can be given to the emerging AP. The Council also supported and therefore endorsed the revised level of housing provision for the period 2011-26.

1.8 The planned level of provision for the period 2011-26, the remaining part of the FoDDC Plan period covered by the housing study is 320 dwellings per year. This equates to a need to identify land for 4800 dwellings over the period 2011-2026. 838 had been completed by the end of 2013/14, leaving a balance of 3962 to find. For the calculation of the five year requirement at the present time a 20% buffer is applied and then the "shortfall/ backlog" (which stood at 122) is added. This approach of adding the backlog at the end of the calculation has been supported in recent appeals. As far as the 20% is concerned, the last years (2013/14) completions figure exceeded the required level and there are indications that the same will occur in 2014/ 15 so although it is still prudent to use the 20% buffer at present the situation is being monitored. The total requirement for the five year period is therefore as follows:

March 31 2014	Five year requirement	Plan period (2011 to 2026)	Annual rate
Plan need	1600	4800	320
Need plus 20%	1920		384
Need plus 20% plus "backlog" (122)	2042		408

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Availability and assumptions made including any buffers and backlog.

1.9 The following section provides information on land availability. It concludes that the land supply is adequate to meet the revised five year requirement. It is further concluded therefore that the land identified in the AP as published together with the assumed supply from unidentified sources, provides sufficiently for the plan period to 2026.

Small Sites (0-5 net dwellings)

1.10 The five year contribution from small sites is assumed to equate to 60% of those with permission but not started and all of those that are under construction. At the end of 2013/ 14, the consents outstanding and the sites under construction were assessed as able to provide 74 dwellings per year over a five year period. This compares with an 11 year (2002/3- 2013/14) average number of net completions of 97pa from this type of site so 74 per annum may be an underestimate of the likely contribution from this source.

Windfall (sites of 6 or more dwellings)

1.11 A small contribution from “large” sites that at present do not have planning permission and are not allocated or proposed to be allocated is made in the calculation of land availability. A study of the dwellings complete from this source showed in 2012 a past average rate of 82 dwellings per year from this source. An allowance needs to be made for the lead in period given that these sites will not have planning permission. A total contribution of 48 is assumed and attributed to the fourth and fifth year of the five year period. Actual contributions from this source will vary over time but it is likely to remain as a source of dwelling completions as unforeseen opportunities are realised.

Large sites- allocations in adopted plan and in emerging AP

1.12 The greatest contributions to land supply come from sites allocated in the adopted Plan or proposed to be allocated in the emerging Allocations Plan. Only sites taken forward into the AP are included in this category, and of those most are currently allocated in the saved parts of the outgoing 2005 LP. Some of these sites have planning permission and would in the absence of other evidence therefore be taken to be available over the five year period. Other AP sites may have lapsed permissions or may not yet have received permissions. The sites are all assessed in the table below.

Large Sites not allocated

1.13 There is a category of sites that have not been allocated in an adopted plan and are not proposed to be allocated in the AP but have planning permission, or have had permission and are regarded as commitments. These are individually assessed below.

1.14 All of the large sites whether allocated or not are subject to guidance that where they have permission they should be regarded as available unless there is evidence available to the contrary. Such evidence may include that relating to their viability and also the perception of the ability of the housing market to support the build rate implied. For these reasons a number of sites that are available are discounted or their contribution is reduced. All of the large sites are the subject of regular enquiries of developers/ owners and their agents regarding their availability and this information is updated annually.

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1.15 The table below summarises the current (March 2015) large sites and summarises the Council's position on availability. The site by site list appended contains all large sites and other sources of supply. From it the range of assumptions about each individual site can be seen in respect of whether it is considered available within five years and its ultimate capacity. Two basic assumptions are made in the tables and these are whether or not the sites new to the AP and which do not have planning permission are included in the assessment. Within each of the two assumptions is a range in terms of the numbers of dwellings assumed to be able to be delivered.

1.16 The assumptions made in the table are based on information in relation to the individual sites and their availability and also their status. All assumptions are still supported by material, usually from owners/ developers about the availability of individual sites but it is considered appropriate to provide a range of low- high availability in order to illustrate the way in which the actual requirement could be met.

1.17 In addition to the illustrative variations that arise from the availability assumptions, the table illustrates the impact of not counting any sites that are only allocated in the forthcoming AP (that is sites new to this Plan that do not have planning permission). This does still include sites that are new to the AP and have valid permissions, several of which are now under construction. Sites in this last category are at capable of providing about 269 dwellings. Some gained consent after being proposed in the AP while others are included because they have been granted permission before being identified in the AP.

Category	low with AP allocations	high with AP allocations	low without AP allocations	high without AP allocations	total supply
Sub- total sites in adopted plan with without pp	878	1156	878	1156	2497
Sub- total sites with pp or lapsed not allocated	601	620	601	620	639
sites newly allocated in AP with and without PP	530	585	269	269	771
windfall allowance 6+	48	48	48	48	615
small site allowance 74pa	370	370	370	370	888
total supply	2466	2818	2205	2502	5410
year's supply equivalent	6.0	6.9	5.4	6.1	
5 year requirement	2042	2042	2042	2042	

1.18 In addition to the sites listed and the two generic sources of additional land (small sites and large windfall), there are sites in the emerging AP which are allocated for development which may include housing but to which no specific number is ascribed in the Plan itself. None of these are counted in the table but clearly as they are identified as having potential for housing may add to the numbers. The sites are as follows:

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Sites in AP part identified for housing but not counted in five years supply schedule below	Possible dwelling contribution (up to)
Stowfield Lydbrook, former industrial site identified for mixed uses, supported by owner as proposed to be identified- listed but no contribution assumed within five years	45
24 High Street Cinderford- retail and mixed use allocation in town centre	10
Lydney Town Centre Hams Rd mixed use allocation retail and other uses.	15
Lydney Pine End Works- mixed allocation including employment, recreation, retail, tourist accommodation and residential on harbourside location	30
Lydney railway station mixed allocation for commercial residential and other development	20
Coleford Former Court Buildings and related land, town centre mixed use site	10
Land at Berry Hill, comprehensive allocation for community related uses that may include housing	80
Newent Town centre, North of Church St, mixed development including retail and residential- some committed residential permissions	20
Ross Rd Newent, mixed site includes some employment uses and community buildings- adjoins line of canal to be restored- listed but no contribution within five years	40
Longhope industrial estate- mixed redevelopment proposal	10
TOTAL (Maximum potential number of dwellings)	280

1.19 The sites listed in the table above are not included individually in the estimates of supply used to inform this document, but would form part of the assumed windfall element. They have an indicative capacity of about 280 dwellings which may be developed throughout the plan period. Some of the policies enable rather than allocate the sites, others allocate land for mixed development to include housing. Development could take place throughout the plan period.

1.20 In conclusion, there is currently in excess of a five year supply of housing land that can be identified using a variety of realistic assumptions as set out above. This supply varies between 5.4 and 6.9 years. At the lower end of the range (lower availability, no sites new to the AP which do not have planning permission) the supply is slightly above five years.

1.21 The publication of the AP and the new OAN was approved by Council at their meeting on 26th February. Sufficient land has been identified for both the calculated five year requirement and the entire plan period. The AP does already include a degree of flexibility which means that it can provide for

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delivery in excess of the requirement. It will be reviewed and such review is very likely to roll forward the plan period five years to 2031. This roll forward will itself offer an opportunity for further assessment of the appropriateness of the OAN, which will in any event be monitored and reviewed.

Previous Five Year Requirement

1.22 Until the revised OAN was available, the annual requirement was derived from the CS and was 310pa. This was based on a plan period of 2006-26 and an accumulated backlog of (from 2006) of 376. The five year requirement was calculated as 2236, using a 20% buffer. Against this the current supply of between 2205 and 2818 can be assessed. At the lowest level of supply (no new AP sites unless they have permission and a low yield from the remainder there is slightly less than a five year supply (4.9yrs). Under other assessments, there is in excess of a five year supply. The assessment does however not use the up to date OAN and is provided here for information only.

2. Table of housing sites individually assessed.

13/04/15 draft FoDDC sites over 5 net five year supply 2014/15 to 2019/20.			POSSIBLE RANGE OF DWELLING AVAILABILITY				
Ref	sites allocated in adopted plan	2014 update (excludes 2014-15 comps)	With AP sites		without AP sites		capacity
			five yr low	five yr high	five yr low	five yr high	
1822/13	Blakeney former goods stn o/l 2009	under construction	17	17	17	17	17
0546/13	Bream (Woodside)	permission for 9	9	9	9	9	9
1280/13, 1279/13, 0663/14	Cinderford Northern quarter, as allocated in LP	Site considered in two parts, HCA permission is outline consent for up to 195 dwellings, remaining application covers 40-50 in addition. Likely capacity considered up to 220. 80 considered within 5 years. 50 approx accessible from first phase of Spine Road and remainder from Newtown Rd. NB the first phase of the Spine Rd has detailed consent and is due to be commenced in November 2015. NB legal challenges have been made to the application.	80	120	80	120	220
0256/12	Cinderford Railway Tavern Station Street 10	conversion approved and subject to current permission (expires 8/15). Considered deliverable	10	10	10	10	10
0718/11 0510/13	Cinderford St Whites Farm	existing developer not in control of phase 2, so cannot comment, site covered by existing permissions, accessible with services available adjoining school under construction	68	68	68	68	68
1590/04, 0183/09	Cinderford Station St Listers see above two sites	agent reply site available and could be completed , subject to relocation, sale and any remediation of possible contamination. Considered available but not within five years in all estimates	0	25	0	25	100
0539/08	Cinderford Station St Cannop Foundry	agent reply available and could be completed subject to revised application. Capable	0	20	0	20	30

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		of delivery but no current consent. Site has been cleared.					
0885/10	Cinderford Station St Turley Ct and Wilce land	agent reply all deliverable subject to sale states that viability has been an issue permission lapsed November 2013 but site remains an allocation	11	22	11	22	22
1238/12	Cinderford Valley Rd S (inc Abattoir) now 92	under construction- total 92 some complete	76	76	76	76	76
1167/13	Coleford Owen Farm	agent (developer) reply under construction all deliverable within five years first completions will be recorded 2015/ 16	156	156	156	156	156
na	Coleford Poolway Farm	agent reply all deliverable inside five years	80	80	80	80	80
0945/11, 1975/11	Longhope Rectory Meadow	permission valid but agent reply not viable current revised application for 24 dwellings	0	0	0	0	0
na	Lydney East Liddington land	accessible via MMC land East of Lydney, not assumed available within five years	0	0	0	0	80
1336/04	Lydney East MMC (not Emp land site)	owner/ developer plans development soon, according to information in 2014, renewal application submitted and site is accessed from adjoining almost completed "phase 1".	150	200	150	200	390
0412/13	Lydney East Phase A (RHL site)	owner reply can deliver but viability has an impact-assessed together with Lydney "B"	0	0	0	0	323
1097/08, 1809/13PLANOB	Lydney East Phase B (RHL site)	owner reply can deliver but viability has an impact-assessed alongside Lydney "A" but can be developed from Highfield Hill. Current planning application for sewer.	144	256	144	256	750
1325/06	Lydney Holms Farm	agent reply available and deliverable	27	27	27	27	27
0086/09	Mitcheldean Glos Rd	developer reply all available and able to be completed (site u/c)	32	32	32	32	32

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800/09, 801/09	Newent Broad St	agent reply available and deliverable, may be potential for alternative permission	9	9	9	9	9
0264/10, 1630/10	Newent Onslow Rd B West of Bury Bar	site u/c	27	27	27	27	27
na	Newent Ross Rd	no dwellings assumed in five years	0	0	0	0	30
na	Sling Adj Miners Arms	owner reply site being marketed considered available and deliverable no current permission	0	20	0	20	20
0111/07	Woolaston inc Netherend Dairy	available site now revised in draft plan in accord with owner's submissions which addressed viability. Larger part subject to permission which expired in June 2014. Additional part of site listed under new AP sites below.	21	21	21	21	21
Sub total sites in adopted plan with without pp			917	1195	917	1195	2497
Sites not allocated but with PP or committed			With AP sites		without AP sites		
	Includes lapsed pps		five yr low	five yr high	five yr low	five yr high	
0620/10	Cinderford 3 commercial St 2481	uc almost complete	8	8	8	8	8
2461/11	Cinderford 52 Ruspidge Rd	agent reply site is available and deliverable- sale expected inside 12 months	8	8	8	8	8
0125/08	Cinderford 97 St Whites Rd Cinderford Bridge	legally commenced	0	8	0	8	8
2019/10	Cinderford Hollydean	complete	0	0	0	0	0
0344/14	Cinderford St Johns Parish Hall 2217	8 under construction	8	8	8	8	8
0678/13	Cinderford St Whites Rd Peacock Lane Ruspidge	under construction	18	18	18	18	18
1370/07	Coleford 12 Fox's Lane Broadwell 2320	na- site complete	0	0	0	0	0

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0667/08	Coleford 25/27 Woodgate rd Broadwell	now complete	0	0	0	0	0
1160/11	Coleford 27-41 Coalway Rd	under construction	41	41	41	41	41
1645/12	Coleford Dukes travel Berry Hill	available according to owner	7	7	7	7	7
1725/07	Coleford Kings Meade	owner reply available and can be completed some groundworks	14	14	14	14	14
0131/11	Coleford Newland St former WCs	foundations in place but site believed sold	7	7	7	7	7
584/12	Coleford Sunnybank Hse	all u/c	6	6	6	6	6
1332/11	Coleford Tufthorn Ave +9	na	0	0	0	0	0
0114/13	Corse Grange Corse	revised consent 2014,	7	7	7	7	7
1753/12	Drybrook Dairy Farm ol 18 2009 2640 17 net	agent reply available and deliverable	17	17	17	17	17
1219/12	Dymock Western Way	earthworks commenced on part of site	20	20	20	20	20
1194/10	Hartpury Over Old Rd 13 total	complete	0	0	0	0	0
0133/10, 0158/08	Lydbrook Central Eng works	owner reply available and capable of delivery	0	11	0	11	11
1303/13	Lydbrook Former Rothdean site	agent reply- available now has permission for 26	26	26	26	26	40
0273/10	Lydbrook Orchard Rd Joys Green 2465 net 2	na	0	0	0	0	0
0255/13	Lydney Cross Hands Highfield Hill	agent reply available and deliverable	21	21	21	21	21
1089/11	Lydney Highfield Rd	site under construction some completions not yet recorded	47	47	47	47	47
0	Lydney Highfield Rd rear of T & T	site deliverable (information accompanying application)	110	110	110	110	110
0886/10	Lydney land adj Federal Mogul	under construction- nearing completion adjoins MMC site Lydney East	46	46	46	46	46

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0762/12	Lydney Pylers way	2RH scheme under construction	4	4	4	4	9
0	Newent Bury Bar Lane 2532	within larger site counted above (Linden Homes) and near complete	0	0	0	0	0
0	Newent Craddocks Culver St 2452	complete	0	0	0	0	0
0	Newent Culver Street	complete	0	0	0	0	0
0181/12	Newent Foley Road	owner considers site is available but estimates only 85 dwellings will be delivered- this is considered a reflection of the market for sales not land availability	120	120	120	120	120
0	Newent Whitegates Culver St 13 809 1406	complete	0	0	0	0	0
1550/12	Redmarley The Rock	completed 2014/15	11	11	11	11	11
0	Staunton Corse Chartist Way	complete	0	0	0	0	0
0287/13	Tibberton	under construction almost complete	9	9	9	9	9
0794/12	Tutshill Highcliff Beachley Rd Tutshill 7 09 1932	agent reply available and deliverable	7	7	7	7	7
1082/14	New Rd Bream	new permission 2014 for part of allocation, site total 30	14	14	14	14	14
1877/13	Newent Southend lane	New site with planning permission January 2015.	25	25	25	25	25
Sub total sites with pp or lapsed not allocated			601	620	601	620	639
Sites newly allocated in AP with and without PP			With AP allocations and pps		AP sites with permission		
			five yr low	five yr high	five yr low	five yr high no AP	
na	Cinderford Football Club	discussions with developer underway	0	40	0	0	80
0438/13	Coleford Bank Street (Extra Care)	completion spring 2015	49	49	49	49	49

2. Table of housing sites individually assessed.

na	Coleford Berry Hill	no housing now allocated in Plan	0	0	0	0	0
0	Lydbrook Stowfield	discussions with developer underway	0	0	0	0	45
na	Lydney Augustus Way	part of a larger site subject of application, and appeal. FoDDC allocation for part now deleted from Published Plan.	0	0	0	0	0
0	Mitcheldean Former coach depot	vacant site considered available	12	12	0	0	12
0	Netherend Ash Way	allocation in AP	12	12	0	0	12
1513/13	Newent Watery Lane	outline consent	30	30	30	30	30
1792/13	Tutshill/ Sed Adj Wyedean School	permitted on appeal and allocated accordingly	110	110	110	110	110
0013/13	Whitecroft Former Vencil Resil permission	total 49 under construction or complete	40	40	40	40	40
	Bream additional land at Ryelands Rd/ Highbury	part of allocation, total 15. this part new to AP, not assumed within five years.	5	5	0	0	6
	Bream off New rd/ High Street	part of new allocation see current permission entry for remainder site total 30	15	15	0	0	15
	Cinderford Valley Road	part of new allocation supported by owner as available	30	30	0	0	45
	Coleford Kings Head	new allocation property in temporary use	12	12	0	0	12
	Coleford Lawnstone Hse	new allocation FoDDC owned-demolition intended shortly	8	8	0	0	8
	Drybrook		20	20	0	0	50
	Lydney Hill Street	new allocation past main occupier now operating from new alternative premises	25	25	0	0	25
	Mitcheldean former George Hotel	new allocation property vacant current application for redevelopment for residential use	18	18	0	0	18
	Mitcheldean new site	site is redevelopment of employment use, no contribution inside five years allocation supported by owner	0	0	0	0	40

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	Netherend Farm additional land	addition to previously allocated site by owner and considered able to be developed total allocated 36	9	9	0	0	9
	Newent Cleeve Mill E Care	owned by prospective developer (Two Rivers Hsg) has permission	40	40	40	40	40
	Newnham	new allocation supported by owner/developer	40	40	0	0	40
	Newnham former Victoria Hotel	vacant property new allocation supported by owner	20	20	0	0	20
	Sedbury Tutshill A48	representations in support of availability from owner July 2014	35	35	0	0	35
	Whitecroft Scovill		0	15	0	0	30
Sites newly allocated in AP with and without PP			530	585	269	269	771
Summary							
Total			2009	2361	1748	2045	3907
windfall allowance 6+	81 pa after year 7		48	48	48	48	615
small site allowance 74pa	74 pa		370	370	370	370	888
total supply			2466	2818	2205	2502	5410
year's supply equivalent			6.0	6.9	5.4	6.1	
5 year requirement			2042	2042	2042	2042	
Plan requirement 2011/ 12 on- 15 years 320pa less completions	4800 - 838= 3962					3962	

