

Forest of Dean Housing Delivery Note 2023-2024



Contents

1	Introduction	3
2	Review	4
	Lydney	5
	Newent	5
	Coleford	5
	Cinderford	5
	Sedbury / Tutshill	6
	Villages	7
	Other district wide contributions	7
3	Conclusion	9
	Replacement Local Plan	9
	Housing Delivery Test	11
	Site distribution and nature	11
	Trajectory tables	11
	Summary of Housing Land Availability	12



I Introduction

1.1 This note provides a brief commentary to accompany the housing trajectory for 2024-29 for the Forest of Dean District (FoDD). It concentrates on housing delivery and activity during the past year. (2023/ 2024).

1.2 Overall a continued high number of completions was recorded. A total net figure of 431 housing completions was recorded for 2023/ 24 compared with 517 for the previous year and 493 for the year before. The LP requirement is 330pa as recorded in the 2018 Allocations Plan. This Plan is however more than five years old following adoption in June 2023 and the calculation of housing need using the "standard method" now applies. This is based on the period 2024-34 using the 2014 forecasts from ONS. The latest published affordability ratio (9.38 for 2023) is used giving the annual requirement or new housing is 330 or 6606 over 20 years. The future availability of land for development is assessed against this requirement. Given the high rate of completions against the supply of sites designed to meet the requirements of the outgoing Allocations Plan and its end date of 2026, the supply looking forward over the next five years and relying on existing sites and permissions remains less than five years at a minimum of 3.32 years. There is a new Plan in preparation which has reached its first draft (Reg 18) consultation stage. This draft contains allocations intended to meet the needs of the area and considers the period 2021- to 2041. T

1.3 With a Plan requirement to provide 6606 dwellings over the 20 years 2006-26, the net total now provided is 5802, which equates to an average of 322 per year an average which is 97% of the 2005/06 to 2025/26 requirement. 88% of the required 6600 dwellings have been delivered and a further 798 would be required over two years to reach this total, that is 399 per year. This may be compared to an annual net completions rate averaging 427 over the past five years and one of 480 for the past three years.

1.4 The trajectory table shows estimates for future completions, and a future supply of about 3.32 years. The actual availability figure may vary as sites presently allocated come forward and is likely to increase. It is also unlikely that there will be no completions within five years on sites that do not at present have detailed permission. The sites are discussed in greater detail below.

1.5 The number of completions recorded for 2023/24 shows 87 in Lydney, 80 in Coleford, 134 in Newent and 10 in Cinderford.



2 Review

2.1 Completions over the past three years remain at a high level reflecting some major sites which are being developed in Newent, Lydney and Coleford. In 2022/2023 a record number of completions were recorded, 517 net. In 2023/24 the figure was 431, and in 2021/22, 493 making a three year total of 1441 which is 45% higher than an annual rate as required by the outgoing Plan and by the current requirement (using the standard method). Applying the the HDT (Housing Delivery Test) would produce a 100% requirement of 990, 95% of which is 940. The latter set against net completions of 1441 produces a result of 153%.

2.2 The above figures are a function of the scale of activity on sites being developed by private housebuilders as well as the high level of activity providing affordable homes on sites that are 100% affordable. Overall activity is summarised in the accompanying trajectory table.

2.3 Delivery of affordable homes remains a key priority for the Council and of the total delivery of 431 dwellings in 2023/24, 128 (30%) were affordable. These comprised 92 (72%) affordable homes for rent, and 28% (36) for shared ownership.

2.4 The homes were provided right across the district with 36 in Newent, 28 in Lydney, 18 in Coleford, whilst the remainder were provided in rural parishes. Those completed ranged from one-bedroom flats they included two-bedroom bungalows and larger four-bedroom houses as well as two and three bedroom family houses.

2.5 All of the affordable homes delivered achieved an energy performance rating B, meaning they will produce less carbon dioxide when compared to an average energy performance rated property (the average rating for homes in the UK is D).

2.6 The following sites delivered the affordable homes:

Clanna Road Alvington PI494/15/OUT	4
Lower Lane, Berry Hill Coleford PI482/14/OUT	18
Forest Grove, Lower Lane, Berry Hill Coleford	9
Land adjacent to Hartpury Village Hall Over Old Road	4
Land off Longhope School, School Lane/ Church Road	3
Land between Lydney Bypass And Highfield Road, Highfield	28
Land North of Southend Lane, Newent PI330/18/OUT	36
Land Off Bradfords Lane, Newent PI990/18/OUT	20
Unlawater Lane, Newnham PI733/18/FUL	6

Table 1



Lydney

2.7 The trajectory table shows that much of the current activity is in Lydney where there is scope for at least 427 completions over the next five years. Recent detailed approval and starts on site include one site of 200 and another of 70 within the east of Lydney neighbourhood. The remainder is made up of sites under construction that have already delivered completed dwellings and outstanding consents. Allocated land with outline consent is capable of providing an additional 457 dwellings according to the full trajectory table covering the second five year period to 2029 to 2034. The majority of sites lie in an area where much of the strategic infrastructure has been provided or provided for in the east of Lydney neighbourhood and a start on earthworks on the site at Allaston (where there is detailed permission for the first phase and an outline consent for 200 dwellings) adds to this. A completions rate of about 140 per year on the major sites (ie not including smaller sites, windfalls and prior approvals) was assumed previously and is still considered realistic though it should be noted that nearly 200 dwellings were completed in 2022/23. The prime consideration will remain market conditions as perceived by individual builders which are clearly capable of supporting a high rate of completions although variations in the delivery of affordable homes could vary this figure. There are presently six volume builders with recent (2020 on) or current involvement in the Lydney east development (Redrow, Crest, Barratt/ David Wilson, Bellway, Edenstone and Persimmon). A figure at 140pa is 700 over five years and is considered a reasonable estimate of the potential dwelling supply in Lydney over that period given the availability although a lower average is used in deriving the five year supply for this study.

Newent

2.8 In Newent there are three sites under construction which are almost complete and will deliver 49 new dwellings, all expected in 2024/25. Smaller sites in the town will add to this total and there remains one outstanding allocation for housing in the outgoing AP for about 45 dwellings. Beyond that new sites are expected to be allocated in the new LP and there is presently one outstanding application for land covered by part of one suggested allocation. Although this does not coincide with the proposal in the draft LP and may not comply with its requirements, it does demonstrate along with current SHLAA submissions a considerable level of interest from developers.

Coleford

2.9 For Coleford, there is one large site with detailed permission for 203 dwellings which is nearing completion (28 of 203 dwellings yet to be completed) and an additional smaller site (17) recently commenced. One site has outline permission for 35 and another allocated site is the subject of a detailed application for 140 dwellings and may contribute in the short term. Further allocated or permitted sites will add to this over the next five year period. Within five years it is estimated that an additional minimum of 127 dwellings can be expected and a further 175 beyond these. There remains a balance of allocated sites able to deliver over 80 dwellings which are not yet the subject of applications and are not counted in the above.

Cinderford

2.10 In Cinderford there was one modest scheme completed last year and three schemes with a current consent which are assumed to make a contribution inside five years. In addition there are allocated sites, one with outline permission for 49 which is the subject of pre application discussions



which is likely to come forward. One further area (the northern quarter) has a valid outline permission but is being re considered in terms of how it might progress (much of the land is owned by the council). This site is not included in the supply. Other allocated sites remain subject to pre application discussions and may deliver some housing during the next five year period though they are not counted in the five year assessment.

Sedbury / Tutshill

2.11 Following a period of activity the remaining "large" site (large is defined as over five net capacity) at Tutshill/ Sedbury was completed in 2022/23 delivering 26 dwellings, and there are no other committed large sites at present.

2.12 The tables below summarise the situation in relation to the five larger settlements and in the villages where there are current sites of over 5 dwellings.

Location	comments	Minimum five year supply
Lydney	continued development Lydney E plus two 427 other locations	247
Cinderford	mixed sites one allocated and permitted	(49) 79
Coleford	mixed sites included allocations	127
Newent	remainder on consented sites under construction	49
Tutshill / Sedbury	no current sites	0

Table 2



Villages

Location	Sites listed- dwellings yet to be started or completed	minimum supply
Bream	One site with full permission and technically commenced (9)	9
Drybrook	Two additional sites without consent but allocated (+67)	0
Hartpury	One site with full permission, 11, one with resolution to permit (26 dwellings)	37
Huntley	One allocated under construction (11) one conversion (8)	19
Littledean	One site technically commenced	17
Longhope	One site under construction (total 23, eight completed in 2023/24)	15
Lydbrook	One site with full permission (26)	26
Mitcheldean	Three allocated sites in Allocations Plan, one current full application (9)	0
Newnham	One allocated no permission (20)	0
Sling	One site allocated no permission (20) one with consent revised application (9)	0
Whitcroft	One allocated site current outline application and resolution to permit (66)	0
Woolaston	Two sites one allocated (12) one with detailed consent (36)	36

Table 3 Village sites, yet to be started or completed

2.13 Some additional allocations are proposed in certain villages listed above in the draft LP but their potential contributions are not included in the above.

Other district wide contributions

2.14 In addition to the sites that are assessed individually above, there will be continued contributions from those of five or less net capacity. These have been monitored since 2006/7. Over the last 10 years the average was 66pa and for the last five, 50. The actual figure of completions from these small sites is quite variable. It reflects changes such as the use of Prior Approvals and conversions from other sources as well as recent constraints such as the pandemic. For the present a reduced figure of 40pa has been applied giving an expected 200 dwellings on small sites over the next five years.

2.15 In addition to the on going contribution of small sites, there are likely to be sites coming forward and delivering new dwellings over the next five years which are neither allocated nor have permission at the start of the five year period. Although their number is small, they should be allowed for. Historically FoDDC allowed for a total of 81 pa which was supported by past contributions. With an increased emphasis on the Allocations Plan and its implementation however a reduced figure, still with no allowance until year three and then a progressive increase. Within five years a figure of 48 is used as a likely contribution from windfall sites of over five dwellings, this being geared to an



expectation that dwellings from this source may average 40pa in the longer term but that it is only the sites that are unknown at the start of the five year period that are to be counted.

3 Conclusion

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

NPPF compliant supply	
Annual requirement	330
Sub total	1650
Sub total plus 5%= five year requirement	1733
Minimum dwellings available	1146
Years' supply for plan	3.32

Table 4

3.2 The NPPF deliverable assessment shows less than a five year land supply. Although there are additional sites that could become available in excess of these, there is still a potential shortfall.

3.3 This underlines the need for the LP review to provide additional sites. There is scope in the form of allocated sites and sites with outline consent to come forward in addition to those counted in the above table should the demand support this. All depends on planning applications which mainly stem from demand and the wishes of individual developers. This figure needs to be seen in the context of the continued high level of completions which are being recorded.

Replacement Local Plan

3.4 The Allocations Plan (AP) and the Core Strategy are the most up to date plans for the area adopted in 2012 and 2018 respectively. The AP included an updated calculation of housing requirements in accord with the then guidance. It provided a supply that was endorsed by the Inspector once his recommended modifications were made. The AP is supported by the 2012 Core Strategy. The calculation of housing requirements reverted to the standard method as set out in the NPPF and associated guidance once the AP was five years from adoption on 28th June 2023. The annual requirement set in the AP was 330pa and the standard method at present leads to a figure of 330pa although these are derived in a different manner. Most importantly the standard method is one based entirely on a figure looking forwards with an adjustment intended to take account of the relative affordability in each district. This calculation is the one used for this note using March 2023 affordability figures.

3.5 The replacement Local Plan for the FoDD remains at an early stage of development but in May 2024 consultation draft was approved by Council. Two consultation exercises based on potential strategies were completed prior to that, the most recent in late 2022. Both used the standard method of calculation housing requirements and both took a figure of approximately 7440 dwellings to be required as the starting point for any planned provision.

3.6 The overall requirement has been re assessed annually using the prescribed method and the need over the plan period (2021-2041) is now 330pa which would equate to a total of about 6600 (6606). Although later ONS forecasts have been prepared, those from the 2014 figures are still to be used as required by guidance. The affordability figure (a ratio of house prices to earnings) does change on an annual basis and the current forecast based uses the latest (2023) affordability figures. Over a 20 year



plan the total completions that would be needed to be provided for would be some 13% lower than the 7440 as previously adopted in the earlier consultations.

3.7 The above calculation is made at a time when the standard method itself is being reviewed and may in future be changed. Its base (2014 ONS forecasts) is well out of date. Changes to a more recent base could change the housing requirement and this will need to be taken into account as the LP is compiled. Such changes are likely to be a live issue throughout the remainder of the LP process. Alongside the possible (probable) change of the base date for the ONS forecasts is the possibility of changing the way in which affordability is taken into account. This is currently based on a ratio of median house price to median workplace based earnings. This may remain the recommended approach or may not, whatever its shortcomings.

3.8 In early 2023 there was an outstanding consultation on reforms to the LP system. Some of these proposals could provide LPAs with some greater flexibility over the application of the standard method. It seems may remain the starting point for calculations at the present time. The general election of 2024 is likely to result in changes to any planned alterations of the planning system although how and when it might change is in July 2024 unknown.

3.9 Looking at the material provided in support of the 2024 draft LP for the district, the following is a summary of the housing provision made and proposed. Remembering the plan period began in 2021, the following table is a summary of the current (draft LP 2024) situation.

New allocations made in LP	2347
Old plan sites and permissions i.e. carried over allocations and current sites	2075
Total completions 2021/22 to 2023/24.	1440
Remaining small site contributions @40pa for 16 years	640
Large windfall 16, 32, then 40pa starting 2027/28	528
Total annual net completions or total potential required number 6606 against supply which is 6.4% greater.	7030 currentsites 2021/22 to 2023/24.

Table 5

3.10 From the above it is noted that the supply over the new Local Plan as currently proposed would provide some margin over the requirement. Although some of the sites proposed to be allocated in the new LP will take time to come forward especially the larger ones, others may be in a position to contribute earlier. There are some current applications that reflect proposed allocations. While these may be premature, their presence does indicate that they are likely to be developed should they be confirmed in the adopted version of the LP.

3.11 Although not accounted for in the current five year supply, it is likely that the sites identified or to be identified by the new LP will make contributions within five years to the dwelling totals provided.



Housing Delivery Test

3.12 The Housing delivery test (HDT) is a measure of actual delivery of new dwellings, measuring numbers delivered over a rolling three year average. It sits alongside the requirement to have a land supply sufficient to meet the future needs of a plan. LPAs are expected to deliver (really facilitate the delivery of) 95% of their assessed housing requirement in order to meet the test. This, being based on actual completed units lags almost a year behind events. For the most recent HDT year (2023/24) however FoDDC will again report a total delivery well in excess of the requirement. The HDT requires delivery of over 95% of the required number which for the FoDDC would mean over 940 $((330*3)*0.95)$ dwellings over the past three years. The actual delivery of 1368 dwellings (net) is 45% over the HDT requirement. The HDT itself may be under review, but it is very unlikely that the current delivery within the district will show anything other than a comfortable excess over the requirement.

Site distribution and nature

3.13 The majority of sites which are under construction are being built by private developers and these include major national companies as well as some that are more locally based. A significant number are also being developed by or for Registered Providers who are active across the FoDD and again contributed to the high and welcome number of affordable homes that were delivered. There is one further site of this nature under construction at Newent and two (exceptions schemes elsewhere). Further similar schemes with are expected to come forward with the guidance and assistance of the FoDDC working in conjunction with the relevant RPs.

3.14 Of the private (market) sites which in almost all cases provide a share of affordable housing, the greatest level of activity is in Lydney as referenced above. This reflects the allocations made and almost another 900 dwellings are expected before the existing committed sites are complete. This is likely to provide an on going supply of new dwellings for some years although recent evidence suggests the rate of delivery could be more variable than initially assumed, with 200 completions last year above a previous average over three years of about 140-150. Further contributions are proposed by way of additional allocations in the draft LP. As referenced above the trajectory assumes about 427 of these could be delivered inside five years although a larger number are considered to be potentially available within that time frame and the current rate of delivery would easily support this. The single largest sites outside Lydney are at Newent with a development of 230 dwellings and one of 203 at Coleford both under construction and both nearing completion. Various smaller sites are active across the district, and some with current applications which are not yet under construction are available or likely to be so over the five year period.

Trajectory tables

The sections in the trajectory table are as follows.

Minimum deliverable- sites which strictly meet the definition in the NPPF of deliverable taking into account marketing constraints where appropriate. These sites and an assumed contribution from small sites (less than six dwellings) and windfall provide a supply of 3.32 years- 1146 dwellings (based on a requirement of 330pa and then applying a 5% buffer to give a total requirement of 1727).



Summary of Housing Land Availability

- **Five year land supply- 3.32 years minimum**

