



Local Plan Section
Forest of Dean District Council
Council Offices
High Street
Coleford
Gloucestershire
GL16 8HG

SENT BY E-MAIL AND POST

13 February 2017

Dear Sir / Madam

FOREST OF DEAN ALLOCATIONS PLAN FURTHER CHANGES CONSULTATION

Introduction

Thank you for consulting with the Home Builders Federation (HBF) on the above mentioned consultation. The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing.

Previously the HBF made representations to the Council's pre submission consultation and attended Examination Hearing Sessions held in January 2016. The HBF submit the following representations to this current consultation and confirm attendance at any future Examination Hearing Sessions to be held to discuss these matters in greater detail. These latest representations respond to the further changes proposed by the Council and new supporting evidence including :-

- the NMSS Report 2016 (ED046) ;
- NUPREMIS Report 2016 (ED047) ;
- the Council's Draft Housing Paper Update November 2016 (ED067) ;
- and various correspondence between the Inspector and the Council.

Objectively Assessed Housing Need (OAHN) & Housing Requirement

The HBF acknowledges the proposed housing requirement increase from 320 dwellings per annum to 330 dwellings per annum (6,600 dwellings) for the plan period 2006 – 26 together with the allocation of additional housing sites to maintain a 5 YHLS.

It is understood that the Council's proposed housing requirement is derived from an assessment based on the approach outlined in the Inspector's Interim Findings using the 2014 Sub National Population Projections (SNPP) and Sub National Household Projections (SNHP) with 10 years migration trend adjustment (280 dwellings per annum), an uplift to support economic growth derived from updated economic forecasts (300 dwellings per annum) plus 10% adjustment to assist in meeting affordable housing needs (330 dwellings per annum). It is noted that this proposed housing requirement remains below the Inspector's Interim Findings that "*the evidence does not adequately justify an objectively assessed need of less than 340 dwellings per annum*". The HBF also considers that a housing requirement of 330 dwellings per annum is derived from an OAHN which continues to under estimate the housing needs of the District. The HBF concerns are summarised as follows :-

- the Council's demographic starting point of 280 dwellings per annum is below 305 dwellings per annum which represents the 2014 SNHP multiplied by a vacancy rate of 4.28%. It is believed that the effect of the Council's methodology used for the period 2006 – 2014 derived from completions and a constrained housing figure results in a suppression of the overall housing need for the plan period 2006 – 2026 ;
- the Oxford Economics and Cambridge Econometrics forecasts should not be locally adjusted for the District. Any such adjustments would represent a departure from a Housing Market Area (HMA) wide assessment necessitating discussions about unmet needs with other Gloucestershire HMA authorities. As no discussions under the Duty to Co-operate have occurred the unadjusted economic forecasts should be used resulting in an uplift of 400 dwellings for the period 2014 – 2026.

Therefore with the 10% adjustment for delivery of affordable housing needs this simplistic critique identifies a housing requirement of circa 357 dwellings per annum to accord with the Inspector's approach set out in the Interim Findings. It is also known that an alternative OAHN has been undertaken by Barton Willmore on behalf of Gladman Developments which calculates a housing requirement of 360 dwellings per annum based on the Inspector's Interim Findings approach.

Although the Inspector's Interim Findings judged that there was no reason to make adjustments to household formation rates (HFR) to compensate for any suppressed housing need and no justification for uplifts for worsening market signals new evidence suggests otherwise. The 2014 SNHP identify a

continuing deterioration of HFRs in younger age groups. The latest Department of Communities & Local Government (DCLG) statistical data shows worsening house price to income ratios in the Forest of Dean against comparable authorities in the HMA and England. If the Local Plans Expert Group (LPEG) standard methodology of the calculation of OAHN was applied then the OAHN for Forest of Dean would exceed 400 dwellings per annum.

This very simplistic analysis concludes that an OAHN of 330 dwellings per annum for Forest of Dean under estimates OAHN and therefore the proposed housing requirement will not meet housing needs. In conclusion the housing requirement for Forest of Dean should be no less than 7,000 dwellings (350 dwellings per annum). However this figure is submitted without prejudicing the validity of any alternative OAHN figures calculated by other parties.

Housing Land Supply (HLS)

Whether the proposed housing requirement is a minimum of 330 or 350 dwellings per annum it is agreed that additional land is required for allocation. This land should be both suitable and deliverable in order to demonstrate a 5 Years Housing Land Supply (YHLS) is available on adoption of the Plan and maintainable throughout the entire plan period.

It is the HBF's opinion that as set out in the National Planning Practice Guidance (NPPG) the Sedgefield approach to recouping shortfalls as soon as possible is the appropriate methodology to be applied to the Council's 5 YHLS calculation. The HBF object to the proposed introduction of a Liverpool approach to shortfalls. The evidence set out in the Council's Topic Paper is disputed as irrelevant since the local circumstances in Forest of Dean are different to those of Lichfield District Council and the Gloucester Cheltenham & Tewkesbury Joint Core Strategy. The Council has identified and proposed for allocation 21 housing sites considered suitable, available and viable to deliver the Council's housing needs and provide a 5 YHLS using the Sedgefield approach. The HBF make no comment on the sites selected by the Council. During the Examination other parties may prove or disprove the merits of these selected sites. Even if any disputed lead in times, lapse rates and delivery rates were amended there are alternative sites available as substitutions and / or additions as promoted by other parties so there is no justification for deviation away from the Government's preference for the Sedgefield approach in calculating 5 YHLS.

It is noted that the Council's 5 YHLS position is 5.16 years providing a contingency of only 85 dwellings which is precarious. The Council's 5 YHLS calculations and housing trajectory should be based on realistic assumptions which are supported by housebuilders and sense checked by the Council using empirical data. Furthermore the assumptions on delivery rates used in the 5 YHLS calculation should be consistent whether the Sedgefield or Liverpool approach are used. If any assumptions are overly optimistic the Council's 5 YHLS position will quickly fall below 5 years. If the Council cannot demonstrate a 5 YHLS on adoption the Plan is not sound so it is essential that sufficient housing land is allocated.

Conclusion

We trust that our comments will be helpful in informing the next stages of the Forest of Dean Allocations Plan. In the meantime if the Council requires any further assistance or information please contact the undersigned.

Yours faithfully
for and on behalf of **HBF**

A handwritten signature in blue ink, appearing to read 'S E Green', is written over a horizontal line.

Susan E Green MRTPI
Planning Manager – Local Plans