



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

SENT BY E-MAIL AND POST

20<sup>th</sup> May 2015

Dear Sir / Madam

### **FOREST OF DEAN ALLOCATIONS PLAN CONSULTATION**

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. We would like to submit the following comments and in due course attend the Examination Hearing Sessions to discuss these matters in greater detail.

The Forest of Dean Allocations Plan seeks to allocate sites to meet the development needs of the District. In this context the Core Strategy adopted in 2012 sets out a housing provision figure of 310 dwellings per annum. However the evidence on which the Core Strategy is based pre-dates the National Planning Policy Framework (NPPF) and as such the housing provision figure of 310 dwellings per annum is not representative of an objectively assessed housing need (OAHN) as required by the NPPF.

It is acknowledged that the Forest of Dean is part of the Gloucestershire Housing Market Area (HMA) comprising of the Local Planning Authorities (LPA) of Gloucester, Cheltenham, Tewkesbury, Stroud, Cotswold and Forest of Dean. During the plan preparation process for the Joint Core Strategy (JCS) for Gloucester, Cheltenham & Tewkesbury and new Local Plans for Stroud and Cotswold a compendium of studies on OAHN for the Gloucestershire HMA have been commissioned. The OAHN of Stroud, Forest of Dean & Cotswold Report prepared by Neil McDonald with Christine

Whitehead dated October 2014 (Revised) identifies an OAHN for Forest of Dean of 365 dwellings per annum.

In the topic paper titled “Review of OAHN Proposed Future Allocations Plan 2011 – 26 Forest of Dean” dated February 2015 it is proposed that the adopted Core Strategy housing provision figure of 310 dwelling per annum is replaced by a figure of 320 dwelling per annum in the Allocations Plan. However the OAHN for Forest of Dean is 365 dwellings per annum. If the Council does not meet its OAHN in full within its own administrative boundaries an unmet housing need will arise in the Gloucestershire HMA with knock on effects and consequences for other authorities within this HMA.

From evidence submitted to the forthcoming Examination of the JCS (commencing 19<sup>th</sup> May 2015) and the resumed Stroud Local Plan Examination Hearing Sessions (commencing 12<sup>th</sup> May 2015) Forest of Dean District Council has not questioned the OAHN figures for the HMA, objected to any neighbouring authorities submitted Plan nor requested assistance under the Duty to Co-operate in meeting any unmet housing needs from Forest of Dean elsewhere in the Gloucestershire HMA. Therefore it must be assumed that Forest of Dean District Council will be meeting in full the OAHN of 365 dwellings per annum. So 365 dwellings per annum is the housing requirement for which the Council should be planning in its Allocations Plan rather than 320 dwellings per annum.

There is no evidence to support the argument set out in “Review of OAHN Proposed Future Allocations Plan 2011 – 26 Forest of Dean” that the difference in housing need between 320 and 365 dwellings per annum will occur at the end of the plan period. In reality unmet need will occur immediately and continue to accrue over time. The Council’s proposal of not meeting housing needs from the start of the plan period but to defer such needs until later just compounds into a larger housing need for the remainder of the plan period.

Whilst the Council may intend to rely upon the High Court Judgement from the case between Gladman Development Limited and Workingham Borough Council [2014] EWHC 2320 (Admin) dated July 2014 determined by Mr Justice Lewis perhaps the Council should also consider the more recent advice contained in the Chiltern District Council’s Delivery Development Plan Document Initial Appraisal dated September 2014 in particular the Inspector’s comments on the housing requirement (paragraphs 3 – 5) and “*the risks associated with plans relying on pre-NPPF and RS housing figures*”.

It is also noted that affordable housing thresholds in Policy CSP4 and sustainable energy proposals in Policy CSP3 of the adopted Core Strategy are no longer compliant with national policy as set out in the Written Ministerial Statements dated 28<sup>th</sup> November 2014 and 25<sup>th</sup> March 2015. The Council should consider the implications of inconsistencies with national policy contained within the adopted Core Strategy on which the Allocations Plan may rely.

In conclusion it is suggested that the Council should consider an immediate review of the adopted Core Strategy and the merging of the Core Strategy and Allocations Plan into one comprehensive Local Plan as originally envisaged by the NPPF. Indeed such an approach is being pursued by Harrogate Council following the withdrawal of its Site Allocations Plan from Examination for reasons similar to those outlined above.

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**



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