

Summary and contents of FoDDC response to the Inspector's interim findings (IF).

The following documents comprise the Council's response to the Inspector's interim findings and include the key supporting material and Main modifications tendered. The MMs, and the proposed revised OAN material were approved by the Council on 21st September. The remaining items are supporting evidence and information.

- The MMs previously submitted,
- New MMS tendered for the Inspector's consideration:
 - Revised and additional housing allocations
 - Revised Policy AP9, Herefordshire and Gloucestershire Canal
 - Revisions to reflect the revised housing requirement
- August 2016 Update on housing need and land supply. dated 22/9/16
- Supporting Paper, NMSS 2016 re OAN (Response to the points on the OAN raised in the Inspector's interim Findings.
- Supporting paper Nupremis re Response to the points raised in the Inspector's Interim findings relating to economic considerations in the OAN for housing.
- Supporting additional heritage, flood risk and coal mining information for the sites
- Plans which identify the MMs which are map related.

The Council's response to the IF contains both detail and more general material. The OAN has been reviewed in accord with the Inspector's wishes and the assumptions made have been reviewed where these were the subject of his concerns. Newer ONS material has been used and other assumptions revisited where the Inspector asked for this. As a result, the OAN now lies alongside the Plan period, 2006-26, and is therefore compatible with but revises the CS figure for dwelling provision. The basic OAN equates to 280 dwellings per year. The NMSS 2016 paper contains the key evidence for this part of the exercise.

In considering the submitted AP, the inspector concurred with the basic demographic figure in that plan of 310pa (para 38 IF). The revised figure, 280 pa is the updated equivalent of that.

The IF made clear the need to take account of the possible increase in jobs over the basic levels of change assumed in the ONS calculation, and as a result the Inspector supported an adjustment to the OAN of 600 or 30pa (para 52 IF). The principle of this adjustment is supported but needs to be made using the up to date figures that the IF requires. The exercise has been carried out by NMSS and results in an increase for jobs over the demographic OAN of 400, rather than the 600 previously. This is accompanied by evidence from Nupremis 2016 and NMSS 2016 which strongly suggests that this figure is now considered less likely to be necessary than was the previous 600. The Council follow the Inspector's view that it is prudent to enable housing delivery to provide for this additional

400 and so the OAN is proposed to be adjusted accordingly. It would stand at 300pa with this adjustment, and that figure is the updated equivalent of the previous 340pa.

The Inspector's final finding in relation to housing provision is that there should be greater flexibility to meet affordable needs. He recognises that such provision is not part of the OAN calculation and advocates the addition of 10% uplift to the demographic OAN (para 63). This when applied to 280 would lead to a housing provision figure of 308pa, and when rounded that is 310pa. The figure of 310 pa is therefore adopted as the AP figure for housing provision.

The delivery of sites which can match the five year requirement was of particular concern in the IF and additional sites in order to meet the deficit are now proposed. In addition to additional sites which can deliver sufficient land, the existing ones have been reviewed in order to provide information which covers the year to March 31st 2016. A trajectory showing land capable of delivering new housing has been prepared on this basis. The site proposed can deliver about 2490 new dwellings within the five year period. The requirement as revised is now 2245, being based on the need to meet the backlog from 2006/7 and then add a 20% buffer. The resultant supply is 5.55yrs, which is 11% above the five year requirement.

The sites have been assessed as capable of delivering in the manner proposed and detailed SA is currently under way following the initial assessments. In some cases additional material has been supplied by interested parties. Supporting material in respect of heritage, flooding and coal mining legacy has been compiled for the sites concerned.