

Forest of Dean Allocations Plan EXAMINATION

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18 October 2016

Dear Mr Gibbons

Reply to Council's Proposals in Response to Interim Findings: Further Clarification

1. I write in response to your e-mail of 17 October, enclosing the Council's initial response to my recent Reply to the Council's Proposals in Response to Interim Findings.
2. You have asked for some additional clarification of the scope of the additional consultation that I have asked the Council to undertake, in order to inform the preparation of a full set of proposed Main Modifications to the AP.
3. In summary, the matters on which I am asking for further consultation are:
 - Housing requirement;
 - Housing supply including proposed additional allocations;
 - Proposed amendment to Policy AP 9 to allow for a continuous safeguarded route for the reinstatement of the Canal.
4. On housing, I have sought to explain how the Council's revised proposed housing requirement does not accord with the recommendations of my earlier Interim Findings. I have asked the Council to reconsider the calculation of the requirement figure, taking due account of economic growth and affordable need. I should be happy to advise on any figure contemplated by the Council in response to my concerns.
5. As the need for housing has been a significant element of the responses to earlier consultations and the examination hearings, I consider it appropriate to seek comment on the use of the more recent data to arrive at the proposed revised requirement. In my view, the consultation material need comprise little more than the two consultants' reports and a modified version of the OAN section of the Council's August 2016 Update on Housing Need and Land Supply paper.
6. This element of consultation would be filled out by any additional response on housing for different groups, as outlined in my Reply.
7. The revised figure will set the requirement for the plan period and the necessary 5 year supply. As suggested in my Reply, the changes in output from sites adjusted by the IF now proposed by the Council will require evidence to support them. You have also advised that the proposed supply is also to be amended to include the Gloucester Road,

Tutshill site. Please excuse my inadvertent use of the original figure for this site of 126 dwellings rather than the 95 eventually permitted on appeal. With the additional evidence, including SA/HRA and any updated Keynotes, an amended version of the Council's Update paper could in my view provide the basis of the consultation material.

8. The proposed new allocations to enhance the supply are clearly set out in the Council's paper, but consultation will need to be informed by evidence on the reasons for selection of these sites as the most appropriate option, and their effect on the implementation of the Core Strategy.

9. With regard to the Canal, apart from the need for some further amendment of the proposed policy wording as flagged in my Reply, the material tabled by the Council could form the basis of the consultation material, with some additional evidence of justification for the alignments now proposed.

10. Following conclusion of this round of consultation, I hope it should be possible to finalise Main Modifications, which would then themselves be subject to final consultation in accordance with Regulations. Therefore, the precise wording of potential MMs is less critical at this stage, in my view, than the case for the changes now being put forward. There is no need at present to consult on the MMs previously tabled and not queried by the IF.

11. I hope this provides the further clarification you were seeking. If not, please contact me again through the Programme Officer. Otherwise, I look forward to receiving the Council's revised consideration of the housing requirement and a draft of the proposed consultation material.

Yours sincerely,

Brendan Lyons
INSPECTOR