

Forest of Dean Allocations Plan EXAMINATION

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9 November 2016

Dear Mr Gibbons

Forest of Dean Allocations Plan Council's Note on Housing Requirements 1/11/16

I am writing in reply to your Note on the Housing Requirement dated 1 November and its covering e-mail.

I note the intended housing requirement now outlined of 330 dpa, based on the 2006-2026 period. That figure would respond to the concern raised in my 11 October Reply. But I have not yet seen the full detail behind the latest estimates of potential supply included in your note. I am not aware exactly how the previous estimate in your August 2016 Update of 22/9/16 has been adjusted to arrive at the figure of 2477, and whether, for example, it includes the Gloucester Road, Tutshill site.

Leaving the details to one side, I understand the reasons set out in your note for wishing to adopt the Liverpool method of apportioning the shortfall in past completions, and to divide the shortfall over the remaining 10 years of the AP period.

However, as you have quoted, the PPG advises that the Sedgefield method should be used where possible. In view of the stage the AP has reached, I consider it premature to opt now to depart from Sedgefield, without further exploration of the implications.

Therefore, if the Council wishes to pursue this option, I would ask that the forthcoming consultation should include worked up illustrations of the two alternative approaches, supported by detailed trajectories, and explanation of the Council's preference. This would necessarily mean that the Sedgefield option would have to be supported by an identified supply that would deliver the 5 year target. I appreciate that this could involve the identification of a further site or sites over and above those already considered. But it would be important to ensure that if the AP were ultimately to progress on the Sedgefield model, there would be no further delay in identifying additional sites.

I hope this will assist the Council in preparing its final proposals in response to the Interim Findings and in developing the proposed consultation material, which I look forward to receiving.

Yours sincerely,

Brendan Lyons
INSPECTOR