



Economy and Place Directorate
Forward Planning Team
West Offices
Station Rise
York YO1 6GA

Inspector Simon Berkeley BA MA MRTPI and
Inspector Andrew McCormack BSc(Hons) MRTPI Date: 29th January 2019
C/O Carole Crookes
Independent Programme Officer Solutions
9 Chestnut Walk, Silcoates Park
Wakefield
West Yorkshire
WF2 OTX

Dear Mr Berkeley and Mr McCormack

Many thanks for your letter dated 14th December regarding the examination of the City of York Local Plan. In our previous letter of 13th November we advised that we had been in dialogue with the Ministry of Housing, Communities and Local government (MHCLG) regarding the assessment of housing need in the light of the publication of the revised 2016 sub national population projections and household projections in May and September 2018 respectively.

Whilst it is clear that York's Local Plan has been submitted and is therefore subject to the transitional arrangements applying the 2012 National Planning Policy Framework (NPPF) we take the view that in order to achieve a robust and up to date Plan it is necessary to consider the implications of the newly published national evidence before a final OAN figure is settled through the examination process.

Both the NPPF (2012) and the associated PPG with regards to housing needs assessments are clear that the latest household projections published by the Office for National Statistics (ONS) should provide the starting point estimate of overall housing need.

The PPG is clear that wherever possible, local needs assessments should be informed by the latest available information and the NPPF is clear that Local Plans should be kept up-to-date. It is also clear that 'a meaningful change' in the housing

situation should be considered in this context, but this does not automatically mean that housing assessments are rendered outdated every time new projections are issued¹.

The Office for National Statistics (ONS) released revised sub national population projections (2016-based) in May 2018 post the submission of the York Local Plan which show a marked discrepancy with the previous 2014 based figures on which our current OAN is calculated. This was further confirmed by the release of the 2016 based sub-national household projections by ONS in September 2018. We advised in our previous response that we would be conducting a review of the OAN in the context of the newly released evidence and that we would update you on its conclusions early in the New Year.

This review has now been undertaken by consultants GL Hearn and is enclosed for your consideration. The enclosed SHMA Update report advises that York's OAN is 790 dwellings per annum. This is based on a detailed review of the latest published evidence including the national population and household projections and the latest mid year estimate. The review has been undertaken based on applying the requirements of the National Planning Practice Guidance in relation to the assessment of housing need, under the 2012 NPPF. This confirms to the Council that the 867 dwellings per annum proposed in the submitted Plan can be shown to robustly meet requirements.

Habitat Regulations Assessment (HRA)

Following submission of the Local Plan in May 2018 we received correspondence from Natural England regarding the HRA (CD012). Natural England stated in their letter dated 4th June 2018 (EX/CYC/1) that in reference to recreational disturbance at Strensall Common SAC they '*welcome the additional assessment and further mitigation and avoidance measures set out in section 4 of the HRA. However we remain of the opinion that insufficient evidence has been provided to back up the*

¹ Paragraph 016. Planning Practice Guidance

conclusion of no adverse effects on integrity. We would expect to see a robust and comprehensive visitor assessment'.

The Council responded to Natural England on 19th June 2018 (EX/CYC/2) to advise that whilst we were satisfied that our HRA is adequate without the need for further supporting evidence we were in a position to commission expert advice in the form of a visitor survey to seek to address the matters that Natural England had raised without impacting on the examination timetable and in order for the outputs to inform, if necessary, the identification of further appropriate pragmatic and deliverable mitigation measures. We advised that we would commission the visitor survey as expeditiously as possible and that we would welcome working with NE to agree the visitor survey methodology to ensure it meets expectations.

The Visitor survey was commissioned in June 2018 using expert consultants Footprint Ecology and the methodology was discussed and agreed with Natural England in July 2018. Surveys were undertaken in August and September at the Strensall Common SAC and the Lower Derwent Valley SPA and a final draft report was issued in December 2018. This report has now been shared with Natural England who are in a position to meet with us and our HRA consultants on Monday 4th February 2019. We will be in a position to update you on any implications for the submitted Local Plan following this meeting.

Green Belt

The outcomes of the meeting with Natural England may result in implications for the addendum to Topic Paper 1 (Approach to York's Greenbelt) that PINS require in advance of timetabling of the hearing sessions and the drafting of matters, issues and questions. It is anticipated that should any outcomes from Natural England result in main modifications to sites that we would be in a position to put these forward to the Planning Inspectorate by mid March, together with the comprehensive addendum to the existing Topic Paper 1 – Approach to York's greenbelt [TP1] that provides additional clarification to the matters raised in your letter of 24th July 2018.

We will continue to keep you updated as to how these matters outlined progress and please do not hesitate to get in touch should you require any further information.

Yours Sincerely

A handwritten signature in black ink, appearing to read 'Neil Ferris', with a stylized flourish at the end.

Neil Ferris

Corporate Director - Economy and Place