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## EXAMINATION INTO THE SOUNDNESS OF THE CITY OF YORK LOCAL PLAN

**Inspectors: Simon Berkeley BA MA MRTPI and Andrew McCormack BSc (Hons) MRTPI**

Neil Ferris  
Director of Economy and Place  
City of York Council

By email only

7 May 2019

Dear Mr Ferris

### **Examination of the City of York Local Plan**

Thank you for your letter of 25 March 2019. We note the further work the Council has undertaken in terms of an updated Habitat Regulations Assessment (HRA), the addendum to the existing Topic Paper 1 – Approach to York’s Green Belt [TP1] and the Council’s review of the Objectively Assessed Housing Need (OAHN) undertaken by GL Hearn, and the outcome of this. The approval by the Council’s Executive on 7 March 2019 of these matters and the proposed modifications to the Plan is also noted.

It is clear there has been a substantial amount of further work undertaken by the Council since the City of York Local Plan was submitted for Examination last year. The matters and issues in question, and the conclusions reached by the Council, particularly relating to the updated OAHN figure and the approach to the Green Belt and its boundary are fundamental to underpinning the soundness of the Local Plan. Moreover, we note that the Council proposes the deletion of two site allocations within the Local Plan [ST35 and H59] as a result of the outcome of the visitor survey and subsequent discussions with Natural England as part of the update to the HRA.

As expressed above, much of this new evidence is fundamental to the soundness of the Local Plan, particularly the Council’s overall approach to the Green Belt and the assessed OAHN figure. Furthermore, the proposed deletion of the aforementioned sites and the alterations to the Green Belt boundary amount to potential proposed main modifications – they cannot be considered as ‘minor’ modifications to the submitted Local Plan, as the Council appears to suggest. As a result, we would advise that these suggested changes should not be referred to, or labelled as, ‘minor’ modifications.

Accordingly, in the circumstances, it will be necessary for further public consultation to be undertaken to allow people to comment on all of the new evidence and the proposed modifications to the Plan put forward by the Council. We therefore ask that the Council now undertakes a public consultation providing the opportunity for anyone to make a representation on any of the following:

- the Council's proposed revised OAHN figure, the supporting evidence and any subsequent proposed modifications to the submitted Local Plan suggested by the Council. This should include the Housing Needs Update by GL Hearn, dated January 2019 [EX/CYC/9], the proposed modifications schedule relating to the revised OAHN figure [EX/CYC/15], the SHLAA Figure 6 Update based on the revised OAHN figure [EX/CYC/16] and the updated Figure 5.1 and Table 5.2 Housing Trajectories based on the revised OAHN figure to 2033 [EX/CYC/17a] and to 2038 [EX/CYC/17b];
- the updated HRA, the supporting evidence and any subsequent proposed modifications to the submitted Local Plan suggested by the Council, especially the proposed deletion of the two aforementioned sites. This should include the updated Annex C – 'Lower Derwent and Skipwith Common Visitor Survey' of the HRA, dated 19 February 2019, [EX/CYC/14c]; and
- the proposed changes to the Green Belt boundary, the associated evidence and any other proposed modifications to the submitted Local Plan consequently suggested by the Council. This should include the 'Addendum to Topic Paper 1 – The approach to defining York's Green Belt', dated March 2019 [EX/CYC/18] and the 'Addendum to TP1 Annex 6 – Proposed Modifications Schedule', dated March 2019 [EX/CYC/18a].

For ease of reference, the Council's proposed modifications to the submitted Local Plan arising from the above should be clearly set out in a schedule as part of the consultation material. The consultation should be open to the general public for a period of six weeks and should be undertaken as soon as possible. Furthermore, based on the evidence submitted to us with the Council's letter of 25 March 2019, we would strongly advise the Council to consult directly with the Ministry of Defence and Natural England with regard to particular matters concerning Sites ST35 and H59 and the updated HRA.

To this end, we ask that you liaise with our Programme Officer, Mrs Crookes, regarding the dates for the six-week consultation period to take place and to discuss potential dates for the initial hearings. For our part, we will endeavour to set out and publish the Matters, Issues and Questions for the initial hearings following the consultation period and to hold hearing sessions at the earliest opportunity after this. We remain committed to progressing the examination as expediently as possible and will do all we can in this respect.

We trust that the content of this letter is helpful, and we look forward to hearing from you concerning arrangements for the consultation and possible dates for the hearing sessions. In the meantime, please ensure that a copy of this letter is placed on the examination webpage.

Yours sincerely

*Simon Berkeley* and *Andrew McCormack*

Inspectors