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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

14 December 2018

Dear Mr Ferris

Examination of the City of York Local Plan

Thank you for your letter of 13 November. We note its contents and set out below our response.

You suggest timetabling hearings concerning the objective assessment of housing need ('the OAN') ahead of those on other matters. In the circumstances, we agree that this would be prudent. As such, we will be taking a phased approach to the hearings. In the first phase of hearings we will deal with the Duty to Cooperate, the OAN and matters relating to Green Belt principle. Hearings thereafter will follow a break in the schedule. We will set out a full schedule showing the phases and the hearings session topics within each in due course.

You mention that you have been in dialogue with both the Local Plans and Housing Planning Policy teams at the Ministry of Housing, Communities and Local Government. However, you do not say whether these discussions have led to any conclusions relating to the OAN or the soundness of the Local Plan, or to anything else of relevance to our examination. If anything of pertinence to the direction of this examination has come out of those discussions, then we ask that you inform us now, in order to ensure that the examination is conducted in an open and transparent manner, and to keep us apprised throughout the process.

We note your view that "*... in order to achieve a robust and up-to-date Plan, the implications of the Government's [emerging revision to the Standard Method for assessing Local Housing*

Need ('LHN']) *should also be clarified and understood before a final OAN figure is settled through the examination process*". It is difficult to see why this should be necessary. This examination is being conducted pursuant to the 'transition arrangements' in the National Planning Policy Framework (NPPF) 2018. As such, it is the policies of the 2012 NPPF that apply. The 2012 NPPF requires that an OAN figure be identified. But there is nothing in Government policy or guidance requiring that Local Plans being examined under the transitional arrangements must use the Standard Method. Indeed, the Government's '*Technical consultation on updates to national planning policy and guidance*' notes that Plans submitted and examined under the transitional arrangements " ... *do not need to be informed by a housing need assessment using the standard method*".

The starting point for our examination is that the Council has submitted what it considers to be a sound plan. Given this, and in the light of the above, unless the Council considers the OAN currently identified to be unsound in some way, we intend to now proceed to the first phase of hearings as expediently as possible. This will allow the Council and others to put to us their views on this issue in a structured discussion. To that end, we ask that you contact us via our Programme Officer, Mrs Crookes, to discuss potential hearing dates.

We trust that you find this letter helpful, and we look forward to hearing from you at the earliest opportunity concerning possible arrangements 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