

## Examination of the City of York Local Plan

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Neil Ferris  
Director of Economy and Place  
City of York Council

By email only

9 July 2020

Dear Mr Ferris

### **Office for National Statistics: 2018-Based Household Projections**

When the City of York Local Plan was submitted for examination in 2018, the most recent household projections were the 2014-based projections published by the then Department for Communities and Local Government in July 2016. The 2014-based projections were taken into account in the evidence provided by the Council to support the housing requirement figures in the submitted Plan – an objectively assessed housing need (OAHN) of 867 dwellings per annum.

The Office for National Statistics (ONS), having taken over responsibility for preparing the household projections, published the 2016-based projections in September 2018. In response to this, and in light of the Council's view that there was a '*meaningful change*' in the housing situation between the 2014 and 2016-based data, the Council undertook further work through the *Housing Needs Update (January 2019)* [EX/CYC/9] by GL Hearn and revised its OAHN to 790 dwellings per annum.

The above matters were discussed during hearings held in December 2019.

Relevant guidance in the Planning Practice Guidance (PPG) on Housing and economic needs assessment (Paragraph 016: Ref ID:2a-016-20150227)<sup>1</sup> advises that:

*The government's official population and household projections are generally updated every 2 years to take account of the latest demographic trends. [...]*

*Wherever possible, local needs assessments should be informed by the latest available information. The National Planning Policy Framework is clear that Local Plans should be kept up to date. 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should be considered in this context, but this does not automatically mean that housing assessments are rendered outdated every time new projections are issued.*

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<sup>1</sup> This version of the PPG continues to apply to the City of York Local Plan because the Plan is subject to the transitional arrangements set out in Paragraph 214 of the National Planning Policy Framework (February 2019).

As you will be aware, the ONS recently published their 2018-based household projections (2018-2028) on 29 June 2020. On the face of it, from our understanding of these latest ONS projections, there is a reduction in the household projections for York, particularly between the 2014-based and 2018-based projections. As such, it appears that the latest available information leads to a different starting point for the calculation of the OAHN for York.

In order for us to determine whether or not the Plan's housing requirements are soundly based, we will need to consider whether or not the publication of the 2018-based household projections represents a *meaningful change* in the housing situation from that which existed when the OAHN was assessed and determined for the submitted Plan, subsequently updated through the *Housing Needs Update* and at the time of the relevant hearing sessions in December 2019.

Therefore, we invite the Council to address this question. Please could the Council provide a statement, with evidence-based reasons, on whether or not they consider that the publication of the 2018-based household projections represents a '*meaningful change*' in the housing situation from that which existed at the time of the Plan's submission, the subsequent re-assessment of the OAHN in the *Housing Needs Update (January 2019)* and the relevant hearings in December 2019.

Furthermore, if it is considered that there has been a '*meaningful change*', could the Council set out what the implications are for the housing requirement figures in the submitted City of York Local Plan and those subsequently submitted as a result of the *Housing Needs Update (January 2019)*.

Please would you provide the information requested to Mrs Crookes, the Programme Officer by **4pm on Friday 31 July 2020** and publish it on the Examination website. If you require more time, please let Mrs Crookes know as soon as possible. It is likely that we will also seek the views of Examination participants on this question, once we have the Council's statement. However, we are not seeking representations from participants at this stage and any unsolicited correspondence will be returned. Please ensure that a copy of this letter is placed on the Examination website.

Yours sincerely

*Simon Berkeley* and *Andrew McCormack*

Inspectors