

Cooke, Alison(City Development)

From: Michael Courcier <mrccourcier@gmail.com>
Sent: 30 April 2020 16:21
To: Carole Crookes
Cc: Mary Urmston; Parish Council Fulford
Subject: City of York Local Plan First Phase Hearings

Dear Carole

I am writing to the Inspectors on behalf of Fulford Parish Council.

Over 4 months has now elapsed since the first phase hearings ended in December 2019. Since then, there has been a very significant and unforeseen deterioration in the economic prospects of the UK and internationally linked to the COVID19 pandemic. Most commentators (including the OBR) now predict a severe recession in the coming years, or even a 1930s depression. The only difference between the commentators is how severe and how long the recession will be.

As the Inspectors will be fully aware, the Council's housing need figure set out in the Local Plan is based upon the population required to support the increase in total employment in York which it had predicted over the plan period. This employment-led housing need figure is much higher than that required to support the forecast household change. The matter was debated at length at the first phase hearings in December. However, since then, the substantial and unforeseen deterioration in economic conditions has made the Council's employment projections out-of-date to the point where they can no longer be relied upon as the main basis for determining a figure for housing need. The worsened economic conditions are also bound to restrict household formation in the short and medium term which brings into question another key part of the Council's housing need assessment.

For these reasons we consider that there has been a major change of circumstances since the first phase hearings were closed in December and that the hearings should be reopened to consider the implications for housing need of the new economic circumstances facing York and the rest of the UK.

Whilst writing to the Inspectors, we would also like to restate two matters which were left outstanding from the first phase of the hearings:

1. As we stated several times during the hearing sessions, the first phase hearings did not allow consideration of whether the adverse impacts of fully meeting housing needs would significantly and demonstrably outweigh the benefits of doing so. This is the second stage of the two-stage exercise required by the Courts in Hunston and other cases when setting the housing requirement. In the absence of such consideration, no conclusion (even a preliminary one) should be reached at this phase of the hearing process on the appropriate housing requirement for the Local Plan.
2. There has been no full consideration of the harm caused by the Local Plan housing proposals as a whole to Green Belt purposes and functions. As the Inspectors will recall, they expressly directed there should be no discussion at the first phase hearings of the harm caused by individual proposals, however large and significant such as the new settlements. This direction was fully understandable given the limited scope of the hearings and the restricted time available. However, harm to Green Belt purposes and functions from the Local Plan housing proposals as a whole cannot be properly assessed without reference to individual sites as the overall harm is the aggregate of the harm caused by the individual site proposals. Harm is therefore different to the benefits claimed by the Council, such as meeting housing need, which are not site-specific. In these circumstances, we consider that the Inspectors cannot come to a conclusion at this stage on whether exceptional circumstances exist for the Green Belt exclusions being proposed by the Local Plan.

We hope the Inspectors find this email useful and that you are keeping well.

Regards

Michael Courcier



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