



# Defence Infrastructure Organisation

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Carole Crookes  
Independent Programme Officer Solutions  
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Dear Mrs Crookes

## **City of York Local Plan Examination Queen Elizabeth Barracks: Sites (ST35 and H59) Local Plan Habitat Regulations Assessment**

I am writing in response to the views expressed by the Planning Inspectors in their letter of 12 June 2020 (EX/INS/15) regarding the need for a fresh assessment of Green Belt boundaries and the potential for new evidence to lead to a different outcome in the City of York Local Plan.

You will be aware that the Council has yet to finalise its Habitat Regulations Assessment (HRA) having already produced a second iteration and being in the process of producing a third. Such important evidence should have been correct at the time of the Plan being submitted and it raises the question as to whether the current draft Plan is legally compliant?

The Council has missed its own deadline of 27 March 2020 for submission of the revised HRA and there is still no clear date of when the final HRA is expected. Natural England have reviewed and commented on the Council's early draft HRA and presumably they will be commenting on the final version to express their final position?

DIO is a key stakeholder and I am concerned that the Council has so far failed to engage with us in the preparation of the HRA.

In light of the above and the issues that have arisen in respect of Green Belt, housing need and site selection, please can you confirm whether there are already sufficient grounds for the Plan to be withdrawn and re-submitted? I believe there is an ever-increasing justification for the withdrawal of the Plan and for the Council to work with its key stakeholders to re-establish its position on the identified need for sustainable growth in its region.

I look forward to receiving your response.

Yours sincerely,

A handwritten signature in black ink that reads "C Davies". The signature is written in a cursive style with a large, stylized 'C' at the beginning.

Catherine Davies  
Head of Estates  
Defence Infrastructure Organisation