

Examination of the City of York Local Plan

Inspectors: Simon Berkeley BA MA MRTPI and Andrew McCormack BSc (Hons) MRTPI
Programme Officer: Carole Crookes

Neil Ferris
Director of Economy and Place
City of York Council

By email only

29 January 2021

Dear Mr Ferris

Examination of the City of York Local Plan – Updated Green Belt Evidence and Progress

1. Thank you for your letter dated 15 January 2021 and the accompanying documents which were provided at that time. We have now both read and digested their content.
2. We note the Council's position with regard to the progress of this local plan examination and its intention to proceed, rather than to withdraw the submitted York Local Plan. Therefore, on that basis, and in the context of what we have said in our previous letter, we now respond as follows.
3. Firstly, we ask the Council to clarify whether the latest 'TP1 Addendum (January 2021)' [EX/CYC/50] and its annexes, once completed, are now the documents upon which the Council wholly relies with regard to its Green Belt approach, methodology and assessment. If so, we ask the Council to confirm that these latest documents now wholly supersede the original documents submitted with the York Local Plan on Green Belt matters [SD107A-C] and those relating to the first TP1 Addendum [EX/CYC/18 & EX/CYC/18a-f].
4. We understand that the Council is currently preparing the detailed annexes which will carry through the Council's revised approach to the Green Belt and present the final Green Belt boundaries proposed. We ask that you now confirm when these annexes will be submitted to us for consideration.
5. In addition, in your letter dated 15 January 2021, it is indicated that a number of changes to the Green Belt boundaries proposed will need to be made. If the Council

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does intend to put forward changes to the proposed Green Belt boundary originally submitted, such alterations will need to be the subject of consultation.

6. As such, we ask the Council to prepare a comprehensive schedule of all the modifications it has put forward both during and since the previous hearing sessions which, for consultation purposes, should include any changes to the proposed Green Belt boundary. This schedule will need to be consulted on for a period of six weeks.
7. In parallel, all of the new evidence submitted by the Council since the previous hearing sessions should be open for comment. This includes the new Green Belt work, the Council's response [EX/CYC/43] to our letter of 9 July 2020 regarding housing needs and the supporting evidence for its position - the GL Hearn 'Housing Needs Update: September 2020' [EX/CYC/43a], and the updated Habitat Regulations Assessment (HRA) October 2020 work [EX/CYC/45 & EX/CYC/45a] submitted by the Council in December 2020.
8. Once we have received and read the annexes and the requested schedule of modifications, the examination will then likely be able to proceed to the consultation set out above. We will then determine the best and most expedient way forward in the light of responses received during that consultation exercise.
9. Given the nature of the further work undertaken and the changes which have occurred, we advise the Council that should the examination proceed further, further hearings will need to revisit and reconsider matters previously discussed at the Phase 1 hearings – namely, the objectively assessed housing need, the approach to the Green Belt boundary and the Council's assessment of it.
10. Moreover, given the current circumstances relating to Covid-19, it is highly likely that hearings will need to be held virtually. Despite our previous written requests on this matter, we are yet to receive a clear response from the Council regarding its arrangements for such an eventuality. The Council must be in a state of readiness for this possibility and we again ask for clear confirmation of this readiness from the Council as soon as possible.
11. Taking into account all of the above, including the satisfactory receipt of the detailed annexes from the Council, the required public consultation identified and the statutory notification period for further hearings, we estimate that the earliest point at which further hearings could be held would be late May/early June. Realistically it is difficult to see how they could occur sooner.

12. We trust that you find this letter helpful. Once the Council has carefully considered the points we have raised, we look forward to receiving its response. In the meantime, please ensure that a copy of this letter is published on the examination webpage as soon as possible.

Yours sincerely,

Simon Berkeley and *Andrew McCormack*

Inspectors