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Date: 30 April 2021

Dear Mr Berkeley and Mr McCormack

In line with our timetable set out in our letter of 25 February 2021 for the submission of the Green belt Topic Paper Addendum (2021) Annexes and your agreement to this in your letter of 3 March 2021, we are pleased to enclose the outstanding documents as set out in the timetable. Together with the submission of documents on 31 March 2021, this completes the Green Belt Technical Paper Addendum (2021) and supersedes all documents in the Green Belt Topic Paper Addendum (2019) [EXCYC18a-f].

Please find enclosed for your consideration and publication as part of the Examination Library the following documents:

- GB TP1 Addendum Annex 3 – Inner Boundary, Part 2: Sections 5-6
- GB TP1 Addendum Annex 3 – Inner Boundary, part 3: Section 7-8
- GB TP1 Addendum Annex 4 – Other urban areas
- GB TP1 Addendum Annex 6 – Proposed Modifications to the Green Belt
- GB TP1 Addendum Annex 7 – Housing Supply Update

The annexes reflect the application of the clarified methodology set out in the submitted TP1 Addendum [EXCYC50]. Annex 1 presents the evidence base which has been considered in applying the methodology. Some of the evidence presented in Annex 1 is directly relevant to the methodology but some of it only forms part of the background context only; reference should be made to the Addendum Section 8c, which explains what has been taken into account and for what reason. Annexes 2 (Outer Boundary), 3, 4 and 5 (Freestanding Settlements) set out the detailed boundary justifications having applied the methodology. In addition to the main report, the presentation of our detailed Green Belt annexes seek to address your concerns raised in relation to methodology.

Officers have carefully considered the boundaries previously identified when revisiting the presentation of annexes. In some cases they have concluded that it

would be appropriate to propose modifications to the boundaries originally identified. Annex 6 presents the proposed modifications, which predominantly seek to correct drafting errors, reflect planning decisions made since the publication of previous work, ensure consistency in applying the updated methodology consistently in response to your concerns. It is our view that the scale of modifications overall is not significant. In total, we have proposed modifications affecting just 0.7% of the total area of York's Green Belt within the authority area.

Annex 7 presents an update to the GB Addendum Section 7 (Identifying urban supply and shortfall) and Section 10 (Enduring boundaries beyond the plan period) to reflect an updated housing trajectory at a 2020 base date. The information takes into consideration completions between 2017-2020, unimplemented consents as at 1 April 2020 and a recalculated windfall projection. Additionally, the delivery of site allocations has been reviewed to reflect the projected delivery of sites based upon consultation responses and updated assumptions. The resultant analysis identifies that the Council is confident in their delivery of a Green Belt boundary that endures well beyond the plan period and for a minimum of 20 years.

In addition to the above, we are also pleased to enclose:

- the requested comprehensive modifications schedule;
- Strategic Housing Land Availability Assessment Housing Trajectory Update (2021);
- Sustainable Drainage Systems Guidance for Developers (2018).

The comprehensive modifications schedule brings together the proposed modifications following Phase 1 Hearings Sessions submitted on 22 December 2020 [EXCYC47] and Annex 6 of the GB TP Addendum (2021). We have sought to make clear any superseded modifications previously presented as part of the Proposed Modifications Consultation (2019) [EXCYC20]. We have not sought to include modifications that are not superseded and were consulted on as part of this previous consultation as these remain valid. We trust this is in accordance with your request. We are also preparing an interim Sustainability Appraisal which will be submitted to you shortly for consultation.

The Strategic Housing Land Availability Assessment (SHLAA) (2018) [SD049a-d] presented the outcomes of the housing trajectory to a base date of 2017. The Council recognises that the position in relation to housing supply in the city has changed since 2017. This SHLAA update seeks to update our understanding of the housing trajectory and five year housing land supply to a base date of 1 April 2020 and has informed Annex 7 of the GB Addendum. The SHLAA update reports on the completions between 2017-20, the extant consents as at 1 April 2020 and a recalculated windfall allowance based on updated analysis. In considering the delivery of sites, the housing trajectory has reviewed evidence and reconsidered the likely start dates for development to commence. The housing trajectory continues to rely on a housing requirement of 822 dpa over the plan period (2017-2033). In order to enable permanence to the Green Belt for a minimum of 20 years, this also projects forward the objectively assessed need figure of 790 dpa for a further 5 years, although as the document explains it is likely that the supply would cater for needs beyond that period, thereby underpinning the permanence of the proposed Green Belt boundaries in accordance with policy.

We have also finalised our Strategic Flood Risk Assessment (SFRA) (2021), which presents an update to the submitted SFRA (2013) [SD091] and will be submitting this within the next 10 days. This approach to managing flood risk has not changed; it continues to support the approach set out in Policy ENV4 'Flood Risk' in the submitted Local Plan [CD001]. However, the spatial expression of flood risk across the city takes into consideration updated information published by the Environment Agency. This report also streamlines the approach by excluding the Council's approach to drainage systems, which was published separately; for completeness we submit the 'Sustainable Drainage Systems Guidance for Developers' (2018) as part of the evidence base. Together, these documents supersede the SFRA (2013), document SD091.

In preparing the SFRA report, we also sought to understand whether the changes to the spatial expression of flood risk would affect sites allocations in the Local Plan. The report concludes that there are no significant changes that would necessitate an amendment to the portfolio of allocations in the submitted Local Plan [CD001].

We welcome your clarifications regarding consultation in your previous correspondence [EXINS23] and that this should be in accordance with Regulation 19. We have been in contact with the Programme Officer with regards to consultation to ensure our contacts database is up-to-date. Subject to your confirmation, we would like to proceed expediently and suggest that the Council commence consultation as early as practical in May, if possible. We will ensure this is run in accordance with our Statement of Community Involvement Update (November 2020) [EXCYC49], the arrangements within which our Executive have recently agreed to continue for a further maximum period of 6 months. This means consultation will continue to take into consideration the ongoing pandemic. Our consultation strategy will ensure documents will be made available online primarily, and available in hard copy by appointment only.

We would welcome confirmation as to whether the additional evidence base submitted to you (SFRA & SHLAA) should form part of this consultation in addition to the documents set out in our 25 February letter, the Green Belt Topic paper Addendum and the comprehensive modifications schedule.

The Council is committed to producing a Local Plan for the City and I am grateful as ever for your indication that you stand ready to help in any way you can.

We look forward to hearing from you.

Yours sincerely



Neil Ferris  
Corporate Director - Economy and Place