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Dear Mr Berkeley and Mr McCormack

Many thanks for your letter dated 24th July regarding the examination of the City of York Local Plan. We apologise for the delay in replying, which we explain below. Outlined below is the Council's response to the matters you raise. We have adopted the structure set out in your letter, with the exception of the issue of Objectively Assessed Housing Need (OAN), which we deal with first below.

Housing

The Objectively Assessed Housing Need (OAN)

In your letter you raise a number of queries relating to the OAN as calculated for the submission draft of the Local Plan.

With regard to your question relating to the note entitled 'Introduction and context to objective assessment of housing need', which is provided at the front of the SHMA SHMA Addendum (2017) [SD050], we confirm that this was written by officers. This text was included for transparency following consideration of the evidence by the Executive 13th July 2017. This was to ensure that the outcomes of Executive applicable to this document were clear and could be considered alongside its content without the need to cross reference to alternative reports. The full minutes to Executive on 13th July 2017 are included as supporting document [SD027A].

In relation to the other queries, you will no doubt be aware that since your letter revised household projections for England were published by the Office for National

Statistics in September 2018. This was followed on 26 October 2018 by MHCLG publishing its “Technical consultation on updates to national planning policy and guidance” and further guidance is promised.

Following the receipt of your letter, we have been in dialogue with both the Local Plans and Housing Planning Policy teams at the Ministry of Housing, Communities and Local Government (MHCLG) regarding the assessment of housing need in the light of these recent developments. We understand that a revised Standard Methodology is due to be issued for consultation within the next month or so. As you will be aware, national policy guidance on this issue is in a state of flux.

Whilst York’s Local Plan has been submitted and is therefore subject to the transitional arrangements, applying the NPPF 2012, we take the view that in order to achieve a robust and up-to-date Plan, the implications of the Government’s emerging position should also be clarified and understood before a final OAN figure is settled through the examination process. Indeed, the 26.10.18 consultation noted that issues regarding the standard methodology may be raised at examination. Subject to the issue of the draft guidance as anticipated above, we expect to conduct this review and to update you on its conclusions by early in the New Year.

In the circumstances, and given the central importance of the OAN figure, we also consider that the most expeditious way forward would be to timetable hearings specifically on the OAN as soon as possible and in advance of the other matters, since other aspects of the Plan (such as green belt and infrastructure delivery) may require reconsideration as a consequence of determining the OAN. We raise this now as it would assist in planning and focussing the work of all those concerned with the examination. We would be grateful for your initial views on this approach.

The responses to your remaining questions may be affected by the outcome of the above consideration of the OAN. The Council would, if there was a requirement to revisit green belt considerations in the event of a significant change to the ‘policy-off’ OAN, seek to demonstrate the adverse impacts of such a change on the special character and setting of the city. However, our responses to the questions, based on the submitted plan, are set out below.

The Housing Market Area (HMA)

“We understand that the Council considers York to be within a HMA which includes the City of York and the area of Selby District Council but that the two Councils are, for whatever reason, identifying housing need within their administrative boundaries separately. Is that correct? If so explain why this path is being followed and why you consider it to be a legitimate approach. If not please clarify the position”.

The following points support the approach taken in the York Local Plan.

First, the 2004 Act refers to a Local Planning Authority’s (LPA) ‘area’ and it is clear that the statutory duty for a LPA is and must be in relation to their area. Thus the primary duty of the LPA is to assess the needs of the local authority area.

Paragraph 47 of the NPPF (2012) requires Local Plans to meet the full objectively assessed need in the Housing Market Area (HMA). Paragraph 159 of the NPPF is helpful in clarifying this, in that it requires LPAs to have a clear understanding of housing needs ‘*in their area*’. It then proceeds to require LPAs to prepare a Strategic Housing Market Assessment (SHMA) to assess their full housing needs, working with neighbouring authorities where ‘*HMA’s cross administrative boundaries*’. The LPA must have the clear understanding of their area’s housing needs, but in assessing these needs it must prepare a SHMA which may cross boundaries.

Secondly, in recognition of PPG which specifies that LPAs should assess their development needs working with other local authorities in line with the duty to cooperate, the Council recognised its links with neighbouring authorities and in particular its links with Selby District Council (SDC).

The Council’s Duty to Co-operate Statement [CD020] summarises the Council’s approach to strategic housing matters and the co-operation between neighbouring authorities in the preparation of the York Local Plan. Annexes to the Duty to Co-operate Statement [CD020] include the Duty to Co-operate Matrix (Annex 2) which are enclosed for your information. In summary prior to the commissioning of the 2016 SHMA discussions took place between York and neighbouring authorities to explore whether a joint SHMA commission should be pursued to update the previous NY SHMA. It was wholly agreed that a joint commission would ensure that the wider HMA could be understood and would ensure consistency in the data outputs for each constituent authority area. Whilst York, Ryedale, Hambleton and North York Moors National Park Authority agreed to commission a joint study it became clear through

these discussions that both Selby District Council and Harrogate District Council had both recently commissioned their own SHMA updates using consultants GL Hearn.

At the point of seeking to commission a SHMA update for the York Local Plan Selby District Council (SDC) had recently completed a draft SHMA (June 2015) undertaken by GL Hearn to inform their Allocations DPD (Plan Selby) following the adoption of their Core Strategy, which set a housing requirement for the district of 450 dwellings per annum. Harrogate Borough Council (HBC) had also recently commissioned a SHMA update using GL Hearn to inform their Local Plan. Consequently to ensure a consistent approach the remaining authorities (York, Ryedale, Hambleton and North York Moors National Park Authority) commissioned GL Hearn to produce a SHMA for their areas. The methodology and approach for this study were aligned with those already undertaken for Selby and Harrogate to ensure consistency in data sources and assumptions.

Thirdly, the preparation of SHMAs has included Selby District Council producing its own SHMA which recognises different functional relationships with a range of neighbouring authorities.

The SHMA (2016) [CD051] and SHMA Update (2017) [CD050] for York conclude in respect of HMAs that based on the analysis there are clear links between the commissioning authorities (RDC, HDC & NYMNP) however they do not converge in a single HMA. The historic identification of HMA boundaries firstly suggested that the three districts operate as largely self-contained HMAs albeit that the extent of those vary. They conclude that the most recent evidence does not seem to contradict this position.

At paragraph 2.100 of the 2016 SHMA [CD051] GL Hearn state that self-containment rates suggest that Selby and York should be considered a distinct HMA, Ryedale is a HMA in its own right (although links with York and Scarborough are notable) and Hambleton, although linked with Richmondshire still does not reach the typical 70% self-containment threshold.

House price analysis identifies a separation between Ryedale with Hambleton and York with distinct house price changes in Ryedale in comparison to York and

Hambleton. The Travel to Work analysis indicates very high levels of self-containment in York with lower rates in Ryedale and Hambleton.

At paragraph 2.103 GL Hearn conclude that the *'triangulation of the sources strongly supports placing each commissioning authority within a separate HMA. Within this we would consider that the HMA which covers the City of York extends to include Selby'*.

The aforementioned Selby SHMA (GL Hearn, 2015) concludes that historically national research undertaken by CURDS for the now Ministry of Housing Communities and Local Government (MHCLG) identifies a HMA comprising York and Selby local authorities. Previous research for RSS also showed a relationship between York and Selby but also between Selby and Wakefield and Leeds. Paragraph 9.6 of the Selby SHMA (2015) states that *'analysis of migration flows indicates that the strongest relationship in comparative terms is with York, but flows to Leeds are similar. We see a similar pattern looking at commuting with the north and east of the district relating more strongly towards York and the south and south-at west towards Leeds. We consider that this represents a sensible disaggregation of housing markets based on the information available'*.

At paragraph 9.8 it concludes that *'in the context of the Duty to Co-operate, the authorities with the strongest links to Selby are York, Leeds and Wakefield and that the Council should engage with these authorities on strategic housing issues'*. Paragraph 9.9 concludes that *'where a best fit to local authority geography is sought the strongest relationship is with York. However, it is important to recognise in policy terms the relationships with Leeds and Wakefield and that on this basis it seems appropriate to prepare a SHMA for the District in its own right. This is particularly appropriate as key demographic information used to prepare a SHMA are not published or available below local authority level.'*

In this context it is clear that the defining of HMAs is complex with both York and Selby having close relationships with each other but also with other adjoining authorities including Ryedale and Hambleton and Leeds and Wakefield respectively.

Fourthly, however, the relevant Local Plans for City of York (CYC) and for Selby District Council (SDC) have been produced to different timescales.

At the time that York sought to commission the SHMA jointly with the remaining neighbouring authorities SDC had already recently published their own SHMA and the Selby Core Strategy had been found sound following examination.

The Selby Core Strategy sets out the districts housing requirements based on the previous 2009 and 2011 SHMA with a requirement of 7,200 homes in the period 2011 to 2027, equating to the provision of 450 dwellings per annum. PLAN Selby (the site allocations DPD) is being prepared to deliver this requirement however uses the updated 2015 SHMA to make sure it is based on the most recent population and household projections. The 2015 SHMA for Selby concludes that there is an OAN of approximately 430 dwellings per annum which supports the adopted Core Strategy position. This work was completed before York sought to carry out its own SHMA work.

Fifthly, in these circumstances the York Local Plan appropriately seeks to meet the residual need for the remaining constituent part of the York and Selby HMA

As explained above, the Council recognises that there are clear functional links between York LA and the Selby District LA and that both authorities have worked together, through the Duty to Co-operate, to ensure that housing needs are fully met across the Housing Market Area.

Although through the cross boundary work undertaken it is clear that there is a wider HMA that covers both the York and Selby local authority areas, the timing of the Selby SHMA and plan preparation for PLAN Selby has meant that there was a need for York through its SHMA to identify the proportion of need to be met in the remaining part of the HMA and that it was therefore most appropriate for York to meet its own OAN. This approach has enabled the objectives of the policy to be met as it allows both York to meet its areas need but also ensures that the wider needs of any HMA including links with Selby have been met.

As part of the duty to cooperate discussions both Selby and York have agreed to meet their own OAN within their own authority boundaries. This is confirmed in the consultation response from SDC through the Regulation 19 Consultation which states that *“Discussions have been ongoing with City of York Council throughout the*

preparation of the Local Plan. As part of these discussions both Selby and York have agreed to meet their own objectively assessed housing need within their own authority boundaries”.

The York Local Plan therefore seeks to meet the residual housing need across the remainder of the HMA within its administrative boundary based on the OAN undertaken within the 2016 SHMA [CD051] and the 2017 SHMA Update [CD050].

The supply of land for housing

‘We note Figures 5.1 and 5.2 of the Plan, which illustrate the housing trajectory in graph and tabular formats. However, we are not clear about the sources of supply which lead to the figures for each year of the plan. It would therefore assist us greatly if the Council would update both of these two figures to show the level of housing expected from each source, including proposed site allocations, commitments and windfall sites’

As requested we have updated Figures 5.1 and 5.2 demonstrating the Housing Trajectory set out in the Local Plan (enclosed). This information is drawn from the detailed trajectories presented in Section 4 of the Strategic Housing Land Availability Assessment [SD049]. Figures 5.1 and 5.2 now include details of the expected delivery from each different source including proposed site allocations (including strategic sites (ST Sites 5ha and above) and non-strategic housing allocations (H Sites below 5ha), commitments and windfall sites.

Inherited Shortfall

‘Within Figures 5.1 and 5.2, 56 dpa is included within the annualised requirement to deal with the ‘inherited shortfall’ from 2012 to 2017, the latter being the start of the plan period. However, the OAN established through the SHMA and the SHMA update relates to the period 2012 to 2032. Therefore, is it the case that this ‘inherited shortfall’ is already accounted for within the OAN figure? If so, it should not be double counted. We ask the Council to establish the position on this point.

National Planning Practice Guidance (PPG) is clear that *‘the household projection estimate of need may require adjustment to reflect factors affecting local demography and household formation rates that are not captured in past trends’¹*. It advises that this includes formation rates that have been suppressed historically by undersupply and worsening affordability.

¹ NPPG Paragraph 15. 2a-015-20140306

The PPG also advises that assessments of housing need will need to reflect the consequences of past delivery rates and under supply as the household projections on which the demographic starting point is based does not reflect unmet housing need. It advises that Local Planning Authorities should take a view based on the available evidence of the extent to which household growth has been constrained by supply. Using supply indicators including the rate of new permissions relative to the planned number and the number of housing completions relative to the planned number LPA's should assess the historic rate of development and if it indicates that actual supply has fallen below planned supply then future supply should be increased to reflect the likelihood of under delivery across the plan period.

The 2016 SHMA [CD051] and the 2017 SHMA update [CD050] produced for the Council by GL Hearn have considered housing need across the period 2012 to 2032 using the latest demographic projections available at the time – the 2014 based national household projections. Given that household projections do not reflect unmet housing need the Council, in line with PPG, has also assessed net housing completions over the period 2012 to 2017 and calculated the under-supply against the plan target (867). This analysis shows that over the period 1st April 2012 to 31st March 2017 there were 3,432 net housing completions (see table below). The plan requirement over this period was 4,335 dwellings (867 x 5) leaving a shortfall in actual supply of 903 dwellings.

Year	Completions	New Build	Net Conversions	Net Change of Use	Demolitions	Net Dwelling Gain
2012-2013	540	441	9	61	29	482
2013-2014	374	302	3	54	14	345
2014-2015	523	378	7	132	10	507
2015-2016	1171	908	1	218	6	1121
2016-2017	996	420	21	543	7	977
2012-2017	3604	2449	41	1008	66	3432

The housing supply has therefore been increased by 903 dwellings over the first 16 years of the plan period (2017/18 to 2032/33) by 56 dwellings per annum in order to ensure that the plan accurately reflects unmet historic housing need over the plan period. We do not consider that this historic unmet need is included in the household projections used to calculate the OAN and therefore have not double-counted this need.

Green Belt

For the purpose of paragraph 82 of the NPPF, is the Local Plan proposing to establish any new green belt?

The Local Plan is not proposing to establish any new Green Belt. The principle and general extent of York's Green Belt is set through the saved aspects of the Yorkshire and Humber Regional Spatial Strategy (RSS), which tasks the Plan with formally defining the detailed inner and (outstanding sections of the) outer boundary of the York green belt for the first time.

If not, does the Local Plan propose to remove any land from an established green belt? If it does, is it necessary to demonstrate that exceptional circumstances exist to warrant that approach?

Once established, Green Belt boundaries should only be altered in exceptional circumstances (Paragraph 83 of NPPF). Although strictly speaking it is the general extent of York's Green Belt and not its boundaries that have been established, we take the view that it would be prudent to treat any incursions into the general extent of Green Belt as land removed from the Green Belt, whether to provide land for development or to 'inset' villages, reflecting the emerging spatial strategy. On this basis we accept that any such incursions should pass the "exceptional circumstances" test.

The demonstration of exceptional circumstances may be affected by the issues we raise above on the determination of the OAN. However we set out below the position based on the submitted Plan.

The Plan seeks to identify sufficient land to accommodate York's development needs across the Plan period (2012-2033), and provides further development land to 2038 to establish a 'permanent' green belt boundary enduring for at least 20 years. To ensure a continuous supply of housing opportunities throughout the plan period the emerging Local Plan identifies a range of viable and deliverable housing sites with good access to services and public transport to meet the housing needs of the current population and the future population linked to the city's economic growth ambitions; this will include substantial areas of land for 'garden village' development delivering exemplar new sustainable communities at Land West of Wigginton Road (ST14), Land East of Metcalfe Lane (ST7) and Land West of Elvington Lane (ST15), along with major sustainable urban extensions such as British Sugar (ST1) and York

Central (ST5). The Plan further defines the extent of villages inset or washed over by Green Belt.

The Council consider that having followed NPPF 2012 exceptional circumstances currently only exist to justify the submitted Plan's proposed incursions into the general extent of the York Green Belt and will produce an addendum to the Green Belt Topic Paper (TP1) to more clearly set out the evidence and justification for such planned alterations. In brief, these relate to the City's long term development needs for housing and employment growth, reflecting the Plan's vision for York as a City fulfilling its role as a key driver in the Leeds City Region, York, North Yorkshire and East Riding LEP area and the function York Sub Area.

While acknowledging the transitional arrangements within which York's Plan is being produced, it is our intention that the Topic Paper addendum would address the full extent of NPPF (2018) paras 136-138.

Notwithstanding all of the above, it is not clear to us how the Council has approached the task of delineating the Green Belt boundaries shown on the Policies Map submitted...we ask that the Council now provides this.

In preparing the Plan we have been mindful of the context of NPPF and in particular paragraphs 83 to 85, and propose publishing an addendum to Topic Paper 1 which provides further clarity on the approach to defining the inner and outer green belt boundary and the exceptional circumstances within which proposed alterations to the general extent of green belt have been made. This would bring together conclusions from previously published evidence and decision making around York's emerging spatial strategy. The timetable for publishing this addendum will be confirmed subject to the current dialogue with MHCLG regarding the OAN. Further, if the OAN figure is to be the subject of debate at earlier hearings, there may be merit in producing this work after any interim findings are reached on the appropriate OAN figure. We would also welcome your views on this issue.

Infrastructure

'We ask the Council to produce a chart (a Gantt chart or similar' which builds on that in Appendix 4 of the IDP and shows the level of anticipated housing

delivery from each site (including allocated sites and other commitments/sites with planning permission) on a year by year basis, along with the delivery of the infrastructure that is necessary to provide in order to support that cumulative number of new homes. This should tie in with the housing trajectory, including the revisions to 5.1 and 5.2, and should illustrate the timing of housing delivery and the delivery of the infrastructure needed to support it. A column indicating the likely costs, funding sources and mechanisms to secure funding would also be of considerable assistance'

Again, the comments we provide below are based on the Plan as submitted and do not take into account any potential implications arising from the OAN issues set out above.

Please find enclosed an addendum to Annex 4 of the Infrastructure Delivery Plan (2018) [SD128] presenting the link between infrastructure and housing delivery as a series of graphs and associated Gantt charts, as requested. Please note that this information is based on the current Plan position in relation to housing supply and delivery and may require additional clarification once the issue of OAN is fully resolved.

The graphs and Gantt charts seek to provide clarification on the relationship between housing delivery and infrastructure as set out in the Infrastructure Delivery Plan. The housing delivery information is taken from the Housing Supply Trajectory as presented in Figure 6 of the Strategic Housing Land Availability Assessment (2018) [SD049] and in the updated Figures 5.1 and 5.2 (enclosed). This relates housing delivery both annually and cumulatively to the different levels of infrastructure requirements as follows:

- strategic infrastructure requirements (Level 1) – primarily for transport, but also for health and community facilities (inc. education);
- other infrastructure at the community/neighbourhood level (Level 2) – principally transport and education; and
- infrastructure for accessing a development or mitigating its direct impacts (Level 3) – principally transport and education relating to site allocations.

We have significantly enhanced the previous chart showing infrastructure requirements previously presented to ensure all the infrastructure from IDP Table 5

relevant to each particular infrastructure level (1, 2 or 3) is clear to show estimated cost, committed / identified funding and the funding source as well as local plan year, calendar year and cumulative number of dwellings in the header rows. Please note the colour coding applicable to funding as follows:

- Green = funding secured
- amber = funding expected to be secured);

‘In producing this chart, we ask that the Council liaises with landowners and/or developers in relation to the timing of housing and/or infrastructure delivery if there is presently any uncertainty. This will avoid the need for protracted debate on the matter at hearing sessions. In addition, where new infrastructure requires land – for example the provision of new school places – then we ask the Council to produce now the evidence to show that the land needed can be provided’

The housing delivery trajectories and the infrastructure requirements as shown in the Infrastructure Delivery Plan (IDP) May 2018 [SD128] and the additional information referred to above represents the Council’s best estimate of annual delivery rates and the associated timing of infrastructure requirements based on developer submissions through the Local Plan consultations and discussions with developers/landowners to date.

The graphs show the timescale for the implementation of some substantial items of infrastructure (e.g. new primary access(es)) to be within the early part of the plan period or within the early build-out period of some of the strategic sites (coincident in some case). It should be noted, that some of the initial build out of these sites could be facilitated by utilising existing infrastructure or implementing smaller-scale new infrastructure (e.g. secondary access(es)).

With regard to the provision of educational infrastructure, and in particular the need for additional land for new schools, work undertaken by the Council has established that much of the demand for additional school places between 2018 and 2023 is localised and can be addressed by adding places in to existing provision rather than generating the need to build new schools.

With specific regard to the Local Plan’s education infrastructure requirements, the Gantt chart for Level 3 infrastructure shows primary schools to be provided in sites

ST1 (British Sugar/Manor School), ST8 (Land North of Monks Cross), ST14 (Land West of Wigginton Road), ST15 (Land West of Elvington Lane) and a satellite primary school at Site ST35 (Queen Elizabeth Barracks).

All of these sites have associated Spatial Strategy (SS) policies (within Section 3 – Spatial Strategy of the submitted plan) with sub-clauses to ensure the provision of social infrastructure, including education and it is expected that sufficient land will be available at these sites to build the required education facilities. The timescales for the delivery of these schools (construction commencing in 2023) is such that their coming into use is coincident with development of the sites generating a sufficient number of primary-school age children to attend the schools. For those sites not identified as being required to provide new facilities these sites are required to make an ‘education’ contribution towards providing additional places at existing primary and secondary schools (see the Gantt chart for Level 2 infrastructure) which are considered to have sufficient space available to enable these places to be provided.

At a strategic level the timescale for the ‘New Secondary Education Facility’ as set out in the Gantt chart in the Level 1 infrastructure workbook is beyond the period 2018-2023 and is therefore a longer-term consideration towards the end of the plan period. Consequently, and as a result of significant uncertainties arising from demographic changes (birth rates) and parental choice, land for such a facility has not yet been specifically identified and instead a broad location in the east of the city has been identified as a result of the potential cumulative requirements arising. The Council is confident that land for this facility will be available, if required, through either the provision of land within existing strategic allocations and/or the reconfiguration of existing school sites.

Additional matter of clarification

In undertaking work to address the concerns raised in your letter regarding educational provision, a discrepancy between Policy SS10: Land North of Monks Cross and the Infrastructure Delivery Plan (IDP) [SD128] has come to our attention.

Policy SS10 contains the following sub clause:

viii. *Deliver a new primary school in an accessible location (to be assessed further based on generated need) as well as providing appropriate contributions for nursery and secondary education.*

Appendix 1 in the IDP [SD128] does not include this provision (a new primary school at Site ST8) in the Level 3 Infrastructure 'Education' requirement (page 72) but has instead been included in Level 2 infrastructure (contribution to additional school places) in Appendix 1 (p.p. 66) Therefore we will need to issue an errata addendum to the IDP [SD128] to amend Level 2 infrastructure costs and to insert the following additional row in Appendix 1 at page 72:

Identified strategic infrastructure need	How the need will be addressed	Components	Estimated cost (£ million) ¹	Timescales (short, medium or long term) ²	Responsibility for Delivery	Funding Source	Comments / (Policy Link)
n) Need for increased education provision at the primary, secondary and tertiary levels	Determined as development schemes come forward as need dependent on type and mix of scheme	Provision of a Primary School at Site ST8 Land North of Monks Cross	8.0	Short-to-Medium	<ul style="list-style-type: none"> Developer 	<ul style="list-style-type: none"> DfE Basic Needs Allocation and other direct funding Developer Contributions 	Cost range £6m – £8m (SS10 & D6)

In addition the corresponding Local Plan Infrastructure cost estimates table in Appendix 2 of the IDP [SD128, page 73] will need to be amended to include the £8 million cost for the additional primary school at ST8.

We also note that Appendix 2 includes a double counting error wherein the requirement for the provision of a 'New Secondary Education Facility' (£20m) listed in the Level 1 infrastructure in Appendix 1 (page 60) is currently also included in the Level 3 infrastructure 'Education' estimate in Appendix 2 (page 73). This will be corrected in the errata addendum which we will issue shortly.

We would also like to bring to your attention a recent announcement from Chris Grayling MP, Secretary of State for Transport who has confirmed that the York Outer Ring Road will be one of the five new major roads network projects. We have begun providing more detailed information to the Department for Transport to deliver this as a 'quick win' whilst we deliver the funded and confirmed improvement to the seven roundabouts as detailed in our IDP.

We are grateful for your indication that you will do all you can within the scope of your role to assist the Council and give us every opportunity to address the above issues. We ask that you consider early hearing sessions on the matter of housing need in case this has wider implications for other policies in the plan which need to be addressed expeditiously before any further hearings. We can ensure you that the Council is committed to the examination process and the adoption of a sound Local Plan for the City and we will do everything we reasonably can to achieve this.

Yours sincerely

Neil Ferris

Director of Economy and Place