



Economy and Place Directorate
Forward Planning Team
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Date: 22 June 2020

Dear Mr Berkeley and Mr McCormack

Thank you for your letter dated 12 June 2020 regarding the Phase 1 examination hearings of the City of York Local Plan. As you mention, these covered several fundamental matters, including legal compliance (in particular the duty to co-operate), the objective assessment of housing need, the housing requirement, the spatial strategy and distribution of housing and the general approach taken in respect of the Green Belt.

I understand that your concern with regard to Phase 1 arises from those hearings relating to the proposed Green Belt boundaries and the methodology by which they have been defined and how the Council should deal with that concern.

I welcome your conclusions that the Local Plan (1) does not establish any new Green Belt; (2) does not alter any Green Belt boundaries; and (3) does not need to demonstrate exceptional circumstances for any of the proposed Green Belt boundaries, including those relating to the proposed housing allocations. I also welcome your conclusion (4) that (subject to the issue we address below) the proposed delineation of the outer boundaries is in general conformity with Regional Spatial Strategy.

I acknowledge your concerns about the evidence underpinning the approach taken to defining the boundaries. I understand that those concerns relate primarily to how the “shapers” within the Plan have then been applied to considering the purposes of including land in the Green

Belt - as set out within the strategic element of the assessment in the Green Belt Topic Paper Addendum (“Addendum”).

I am grateful however for the recognition that: (1) the emphasis placed on the fourth purpose (preserving the setting and special character of historic towns) is regarded as appropriate in the context of York; and (2) although there is a difference between Figure 7 in the Addendum and the delineation of the Green Belt boundaries proposed on the Policies Map this “may be a positive indication that appropriate planning judgment has been applied to the analysis”, even though there are other concerns with aspects of the more localised assessment.

In this context, the Council will need some time to consider fully and to respond to your possible options for the way forward. However, based on preliminary work (see below), our provisional view is that there is a strong prospect of the Council being able to pursue option (b)(demonstrating that the boundaries are justified notwithstanding your methodological concerns), potentially with an element of option (a)(explain any misunderstandings in the methodology).

In relation to option (b), work has already begun to test whether the concerns you have expressed have had a substantial effect on the detailed boundary decisions made at a local level. Early indications are that they would not have any significant impact on the proposed boundaries as defined through the local assessments.

The Council will continue this immediate preliminary work, after which we will contact you again to confirm our position and provide further details of how we envisage that this option could be taken forward, including likely timescales.

In relation to option (a), there are aspects of your concerns which may benefit from further clarification, in particular those relating to the treatment of historic assets in the local assessment, but again we propose to explain this further when we contact you to confirm our position following the completion of our preliminary review.

We wish to emphasise that we neither expect nor propose that this work will be so extensive that it would involve a fresh Green Belt boundary

assessment, such that option (c) of withdrawing the Plan should be considered.

I welcome your recognition of the pressing need to put in place a sound Local Plan as soon as possible. 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. I will write again as soon as possible to set out our confirmed position on the most appropriate way forward.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Neil Ferris', written in a cursive style.

Neil Ferris
Corporate Director - Economy and Place