

**SCHEDULE OF RESPONSES TO DRAFT SEQUENTIAL APPROACH TO THE
MANAGED RELEASE OF RESIDENTIAL DEVELOPMENT SITES**

NOVEMBER 2005

GLOSSARY

Below are a number of abbreviations that appear in the responses and comments to the Sequential Approach:

DPD	Development Plan Document (part of LDF)
EA	Environment Agency
ERYC	East Riding of Yorkshire Council
HLPS	Housing Land Position Statement
IPG	Interim Policy Guidance – The Managed Release of Residential Development Sites
JSP	Joint Structure Plan
LDF	Local Development Framework
LEA	Local Education Authority
LPA	Local Planning Authority
OPS	Outdoor Playing Space
PDL	Previously-Developed Land/Brownfield
RSS	Regional Spatial Strategy
SOA	Strategic Open Area
SPG	Supplementary Planning Guidance <ul style="list-style-type: none">• Affordable Housing• Outdoor Playing Space on New Residential Developments

Main Development Strategy Policies of the Joint Structure Plan (JSP)

DS1	Sub-regional urban area (Hull, Anlaby/Willerby/Kirkella, Cottingham, Hessle)
DS2	Principal Towns (Beverley, Bridlington, Goole)
DS3	Towns (Brough, Drifffield, Hedon, Hornsea, Howden, Market Weighton, Pocklington, Snaith, Withernsea)
DS4	Smaller Settlements still to be determined
DS5	Small villages and open countryside

Ref	Summary of response	Officer comments	Proposed changes to the Approach
Pullan Homes, Sheffield			
1	We are fully in agreement with the need to release Greenfield allocated land in DS2 (Goole) settlements in the Western sub-area and that only a small proportion should be in DS4 settlements. The principle of the sequential approach gains our agreement, the detail is too specific.	Noted.	See responses below with regards to specific amendments.
2	We also agree that infill sites should be released before extension sites.	Noted.	None
3	Regarding availability, the first test should be the planning application. This demonstrates an owner's willingness to develop. The planning application should include a sequential approach submission (subjective and objective). [Cites Policy H2 of RSS – "...conserving (and where possible enhancing) the character of the area."]	It is accepted that the submission of a planning application is a good indication of site availability, but it is not a conclusive one. Some land owners are not willing to expend money on a planning application in the absence of a likelihood that that application will be approved. Equally, the planning consent on some sites can be left to lapse.	None
4	This subjectivity is in accordance with para 3.20 and 3.21 of the Approach but not reflected in the scoring system. On a subjective basis, Old Goole should be promoted.	The scoring mechanism purely relates to proximity to services. This is included to help distinguish between the most sustainable locations within this respect. The analysis of each site will include the development's potential to help build communities as stated in paragraphs 3.20-3.21. A judgement for release will be based on all factors.	Clarify that the scoring relates purely to the accessibility criterion. Add paragraph after 3.35 to read, "The scoring system illustrated in Table 5 relates to the 'Access to Services' criterion only. This is an analysis regarding the proximity of a site to existing services and facilities. The decision to release a site is based on both objective and subjective criteria as detailed in PPG3, paragraph 31."
5	With regards to the Infill and Extension examples: Site 1 should be regarded as a nature conservation area and therefore not released immediately; Site 5 is infill but rural agricultural land and not urban waste Greenfield – it also has the perception of being an urban extension.	The sites were provided for illustrative purposes only, with all other factors being equal (i.e. value of natural resource, rural/urban definition settlement role).	Less identifiable (non-East Riding) sites should be used to provide examples of infill and extension (para 3.15).
6	The writer is in disagreement with Table 5 Scoring System especially differentials between 400m and 800m walking distance. A narrow analytical analysis of such a type for Goole may not reflect a town divided by a railway line and docks/Dutch River.	Noted. A justification for the weightings developed in the scoring mechanism should be provided. (see proposed changes). The proximity of services for those sites south of the Dutch River or railway line may be counter-balanced by their regeneration merits.	Insert paragraph after 3.34 to read, "The distances chosen have been selected to provide a range of acceptable walking/cycling distances to each destination. A suggested distance of 400m was provided by the Council's Transport Policy team as an acceptable walking distance to a bus stop. A gradient of relative proximity is provided by the addition of two further bandings (800m and 1200m) which may be realistically achieved through walking and/or cycling."

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7	Goole is well served by primary schools, but Pasture Road school is earmarked for closure.	Noted. Discussions regarding current school places and future implications were conducted with colleagues in the LEA prior to consultation.	None.
8	It is considered for a train user, whether it necessitates a 400m or 800m or 1.2km walk is of no consequence. 1.2km only achieves 0.75 points which is very small compared with all the settlements which do not benefit from a railway station.	Noted. The potential to access other settlements via rail transport for employment, leisure, etc. is important for sustainability. However, it is unlikely that any Greenfield residential development sites will be released in the DS4 areas (see also response to ref 11). The scoring system therefore focuses on intra-settlement variances within the DS2 and DS3 settlements. Thus, a site closer to a train station should be awarded more points than another not so close. See also response to ref 6.	None.
9	Goole is well served by the local bus and would probably result in exact scores for all sites – also, a major new development may result in the amendment of existing routes.	Noted.	None.
10	A database with such a narrow scoring system should not be produced for the application methodology. Leave it to the planning systems, the planning application submissions and elected members.	The Managed Release Approach is an accepted part of the planning system. A number of sites will be released in phases based on not only the scoring system for services and facilities, but other factors stated in the approach such as constraints and the ability to build communities. An overall assessment of the potential to release a site is based on all of these factors.	Add paragraph to reaffirm that the Sequential Approach will be a ‘tool’ to help officers and Members decide which sites are most appropriate for release. “The Sequential Approach will be used as a ‘tool’ to help officers and Members judge which sites are most appropriate for release. The decision on which sites to release will be based on the criteria set out in the Sequential Approach and consideration of the housing requirement position.”
11	Goole will not exceed its quota; all the DS4 areas will continue to over-achieve. Your draft document should address the restrictions required in DS4 areas.	Noted. It is unlikely that any Greenfield land will need to be released in DS4 settlements. The Western JSP sub-area benefits from having allocations remaining in DS2 and DS3 settlements, which are able to provide the required number of dwellings. The Approach should be strengthened to reflect the focus on DS2 and DS3 settlements.	Strengthen the need to release Greenfield sites in DS2 and DS3 settlements only by amending paragraph 3.7 to read, “Only a small proportion of the total requirement for housing is suggested for the DS4 settlements (see paragraph 3.4). It is unlikely any Greenfield land will need to be released in DS4 settlements to meet the required housing numbers set out in the JSP and in the desired distribution as illustrated in Table 3.”

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12	<p>Alternative approach proposed:</p> <p>If all sites are subject to the sequential approach then points need to be given for Goole sites (i.e. 100 points), Howden/Snaith sites (i.e. 0 points) and for DS4 sites (i.e. –100 points). Otherwise DS4 Greenfield sites may be (mistakenly) brought forward.</p> <p>Suggest that a maximum of 30 dwellings per year (or less) per site be used for housing provision calculations to avoid one or two larger sites monopolising the supply.</p> <p>The Boothferry Borough Local Plan suggests there are only 8 Greenfield allocations in Goole which could be grouped accordingly:</p> <ul style="list-style-type: none"> a) Release immediately (max. 30 dwellings p.a.) b) Second phase release dependent on achieved build rates c) Medium term development <p>Use subjective and objective criteria for site selection: Objective – as per your proposal but with detailed amendments. Subjective – development positive or negative to neighbourhood; neighbourhood renewal issues; local Goole input (e.g. Town Council, etc.); nature conservation, etc.; perception that north-east Goole has achieved all recent development sites to the detriment of other areas in south Goole and Old Goole.</p>	<p>The scoring relates to accessibility only. In line with the JSP, priority will be given to DS2 settlements over DS3 and DS4 settlements. There is no need to introduce a score for this aspect.</p> <p>The analysis of each site will contain subjective criteria, especially in respect of a particular development of a site contributing to the enhancement of a community. Objective scoring will inform just part of the decision to release Greenfield land in the most appropriate locations.</p>	None.

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13	<p>My selection would be:</p> <p>a) Release immediately: Site F Millhouse Lane to Railway Line Site H Bretton Avenue Site K Swinefleet Road, Old Goole</p> <p>b) Second phase: Site B North of Carr Lane (but exclude northern portion if deemed extension site) Site E North of Coniston Way Site G South Millhouse Lane (after site F)</p> <p>c) Medium term development: Site C South of Carr Lane (nature conservation issues, multiple ownership and access restrictions) Site D Whincroft, north of Thorn Tree Lane (extension site)</p>	<p>Noted. See covering report which prioritises the Goole site in accordance with the revised Sequential Approach.</p>	<p>None.</p>
14	<p>If a land owner wishes to object he could address this to Forward Planning who could amend if necessary as part of the annual update.</p>	<p>The annual update provides the opportunity to review the number and selection of sites for release. Correspondence with land owners will also inform this process.</p>	<p>None.</p>
Cottingham Parish Council			
15	<p>If guidance is applied to the other sub-areas, and then given the protection (in the JSP policy SP3) afforded to the space between the City of Hull and the Haltemprice villages and particularly for Cottingham (plus Beverley and Dunswell), we would recommend the document's adoption subject to a qualification that the strategic open space (and thereby any intrusion into it) is defined in the Local Development Framework and not as part of a fairly 'ad hoc' approach to the release of land as is implied in the document.</p>	<p>The decision to release allocated Greenfield residential sites will not affect the status of the Strategic Open Areas (SOAs) in the East Riding. No sites for residential development in the SOAs are allocated in the Local Plans and windfall sites would be determined in accordance with the Development Plan which has policies relating to SOAs (or equivalent).</p>	<p>None.</p>
16	<p>There needs to be reference to the benefits of a new by-pass for Cottingham, which ought to be part of the thinking as traffic generation from new development is a matter that is mentioned.</p>	<p>Consideration of a new by-pass for Cottingham is beyond the scope of this document. However, the current transport infrastructure in any town is a consideration for the Sequential Approach and is incorporated within paragraph 3.18. Traffic generation resulting from a specific residential development will be considered as normal through the regular planning process.</p>	<p>None.</p>

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17	There needs to be sufficient reference to the retention of recreational open space for Conservation, Woodland and Sport.	<p>The draft Sequential Approach outlines a number of factors in paragraph 3.18, which need to be considered, including the loss/retention of naturally important areas.</p> <p>The Outdoor Playing Space Supplementary Planning Guidance, together with the Local Plans, set out the provision of Outdoor Playing Space for new residential development, which aims to at least mitigate the loss of, if not increase the supply of such space in the East Riding.</p>	None.
18	There needs to be mention of the need to protect the character of Conservation Areas where large gardens are an important contribution to a sense of place as well as the quality of life of a local community.	The draft Sequential Approach does not set out to provide design guidance or guidance for development in Conservation Areas. It is concerned with identifying the most appropriate sites to release. Relevant policies exist in the various Local Plans to protect and enhance the character of a particular area. The Council will assess the design issues of individual proposals at the application stage using the Local Plan policies and updated guidance documents.	None.
19	The Haltemprice villages are described as adjoining. We would prefer to see the use of the word adjacent.	The use of the word 'adjoining' is consistent with Policy DS1 of the JSP.	None.
20	Note should also be taken of the conclusions of the East Riding Landscape Character Assessment.	Agreed. This should be taken into consideration within the 'Site Availability' section, though it would also be considered at the application stage.	Add sentence to 3.19 to read, "Due consideration will also be given to the Landscape Character Assessment currently being prepared for the Council."
North Ferriby Parish Council			
21	We support the release of residential Greenfield sites in the Goole and Howden areas, as this would seem crucial in the economic development of Junction 36. It is our understanding that there are insufficient dwellings for the likely demand if the area succeeds in attracting the business investment that it seeks.	Noted.	None.

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22	On face value, the criteria to be used to assess the sustainability of smaller settlements seems reasonable though as the Council's interim guidance on sustainability is still being formulated we wonder whether the production of the document is a few weeks premature.	<p>Noted. The Council has prepared an interim sustainability matrix for those settlements not identified in the JSP. This will be for Development Control purposes to help them determine applications for limited scale residential development within those settlements outside Goole, Snaith and Howden which may be judged as sustainable.</p> <p>Overall, the sustainability criteria used in the Sequential Approach attempts to measure the sustainability of individual sites within settlements rather than the sustainability of the settlement itself. This is partly addressed through the settlement designation in the JSP and further settlements may be identified through the interim sustainability matrix.</p>	None.
Elloughton cum Brough Parish Council			
23	Elloughton Parish have already provided 105% of ERYC target quota for housing. Therefore the Parish Council do not wish to see any more significant infill or replacement of existing dwellings with denser build.	The comments are welcome but not applicable to this exercise. Consultation was undertaken with all parish councils (including those outside of the Western JSP sub-area) as a similar mechanism could be used in the future for other sub-areas or become a part of the Local Development Framework process.	None.
Hickling Gray Associates			
24	There should be some limited new housing allowed in DS4 settlements in order to satisfy local needs and/or maintain local services (see Regional Spatial Strategy Policy H2b). This is essential to ensure that rural communities remain viable.	The JSP makes it clear that limited development will be allowed in existing villages if this meets local needs and contributes to sustaining the role of the settlement. This does not necessarily mean that Greenfield sites in these areas should be released for residential development where sufficient and appropriate existing commitments and/or previously-developed land is available	None.
25	Preference should be given to previously developed land and to the re-development of redundant farm holdings within or contiguous with existing settlements.	The JSP, part of the Development Plan, explicitly states that previously developed land will be the priority for residential development (Policy H3, table 6.4). The Sequential Approach seeks to reinforce this but sets out an approach to be used for identifying suitable sites other than previously developed land.	None.

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Bishop Wilton Parish Council			
26	Where is the justification for the release of Greenfield sites? All of the figures and policies point to an increase in the percentage of completions needed in Goole, then Snaith and Howden. In fact completions in DS5 sites should be refused to encourage building in DS2 & 3 areas.	The justification is presented in the annual update for the Managed Release of Residential Development Sites (IPG). This update analyses the current supply position and the annual requirements as set out in the JSP. The principle of residential development in the open countryside would be inconsistent with Policy DS5 of the JSP. This forms part of the Development Plan and is one of the main mechanisms in ensuring development is focussed on DS1, 2 and 3 settlements.	None.
27	If building is allowed on Greenfield sites you will never meet your targets for DS2 & 3 sites or recycled land.	The need to meet the strategic housing provision figure prevails over the proportion of recycled land. However, the implementation of IPG on the Managed Release of Residential Development Sites is a major contributor to last year's recycling figure. This is significantly above the JSP target figure of 30%. Although the release of Greenfield sites may reduce these figures to a certain degree, the approach of using PDL before Greenfield sites will be maintained in all sub-areas.	None.
28	The indicator, 'nearest bus stop' is not much help if there is 1 bus a day or week.	A bus stop will only be included in the analysis where there is a regular services (5 or more days a week) and the departure and arrival times coincide with the main employment hours (before 9am and after 5pm).	Add paragraph after 3.35 to read, 'A bus stop will only be included within the calculation if there is a regular service (5 days a week) and that the service coincides with the start and finish times of most employers (service before 9am and after 5pm).
East Riding House Builders Group (prepared by George Wright)			

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29	<p>The requirement of ERYC is for an amendment to the IPG adopted in 2003 pending the adoption of comprehensive policy through the LDF. Consequently the process attaching to the IPG will involve a more limited level of public scrutiny and independent appraisal than arise in the LDF. The need for IPG should not limit the more extensive re-consideration of the issues in the LDF and the process should not seek to establish a model for wider application or a longer duration.</p>	<p>The preparation of the LDF will involve a rigorous consultation exercise and will be tested through the examination process. Examples of 'best practice' and 'lessons learned' from this current exercise may be taken forward for the LDF together with a great number of other considerations (i.e. updated national/regional policies).</p> <p>Paragraph 2.11 confirms that the Sequential Approach will be informed and, where necessary, amended through the development of the Housing Development Plan Document.</p>	None.
30	<p>The ERHBG is fundamentally opposed to this methodology, which is prescriptive and inflexible and with limited definition of other planning material considerations, which arise in the determination of a planning application.</p> <p>The objection relates to the pre-determination of the weight in the consideration of those material considerations through a points based weighted methodology (as opposed to the subject matter).</p> <p>The approach has the effect of excluding the application of professional judgement and local knowledge (Planners, Members, Development Control Officers).</p> <p>The process rests upon pre-existing circumstances and fails to recognise the strategic objective of policy to alter current trends and establish more sustainable patterns of development. The process does not recognise the transient nature of many of the considerations (i.e. changing bus schedules, surgery re-locations, etc.).</p> <p>The proposals provide no reasoned basis for the level of points attributed to a particular issue and its value relationship to any other issue, which carries a point's value. In this respect it is neither robust nor transparent.</p> <p>The ERHBG consider that the points based approach should be rejected.</p>	<p>See response to ref 4.</p> <p>The points system is an objective analysis of one particular aspect of sustainability – proximity to local services.</p> <p>Professional judgement will be exercised in deciding which sites are suitable for release. This will involve assessing the subjective and objective (dis)benefits of releasing a particular site.</p> <p>Indeed, many of the indicators may be considered as 'transient' (bus schedules, location of surgeries). However, PPG3 and PPG13 state that Local Planning Authorities should assess potential housing sites against a number of criteria, including the accessibility of jobs, shops and services. This particular criterion can be measured objectively and it is believed that a scoring mechanism (amended where necessary) will improve consistency and transparency.</p> <p>Additional comment is necessary to outline that this is an interim measure to be reviewed on an annual basis taking into account all the relevant factors at the time of the review.</p>	<p>Addition sentence in paragraph 4.6 to read, 'The Sequential Approach as detailed is an interim measure which attempts to take into account all the relevant factors at the time of review. Further factors which will affect the release of Greenfield sites, will be considered as part of the annual review where necessary (i.e. additional services and facilities in part of a settlement?.'</p>

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31	<p>The consultation draft fails to demonstrate an evidence-based approach or structured reasoning for its distribution proposals (between the various settlements DS2-4). This is a key element and key decision and its basis should be both robust and transparent.</p> <p>[A schedule of calculations for distribution is provided]</p> <p>A limit of twenty units in the non-JSP parishes (DS4/5) per annum is taken as a starting point to adjust for the previous over-provision (potentially need additional policy restraint of no pragmatic exceptions in DS4 settlements).</p> <p>A growth requirement of 30-50 units for Goole and then a division between the focal populations. Suggested distribution: Goole 150, Howden 60; Snaith 20; DS4 Settlements 20.</p>	<p>An attempt to apportion a distribution of supply was originally set out in Table 3. This was taken and adapted from the August 2005 'Issues & Options' consultation paper and set out a desired annual completion distribution over the lifetime of the JSP.</p> <p>The Housing DPD will develop the desired distribution further and it may be premature for the Sequential Approach to detail specific figures. However, Table 3 (amended to show percentages only) should remain in the document as it reinforces the Development Strategy of the JSP and will help inform the selection process.</p> <p>It will be necessary to amend the document to confirm that a JSP-centric distribution, based on the Development Strategy will be considered as part of the Sequential Approach. As the Approach may be used in future years (or for other areas), it should not be prescriptive in terms of stating the number of dwellings required from Greenfield releases per annum.</p> <p>In light of the current supply position in Snaith (and the responses to the Issues and Options paper), it is likely that Howden will be the only Town (DS3) in the Western JSP sub-area in need of Greenfield releases.</p>	<p>Remove the dwelling figures from Table 3 as the distribution proposed in the Issues and Options relates to the remaining lifetime of the JSP.</p> <p>Amend sentence in 3.5 to read, "Further to this, table 3 sets out a distribution of the total housing requirement for the Western JSP sub-area by settlement type that is suggested in the 'Issues and Options' paper as consistent with the overall JSP strategy"</p> <p>Add paragraph to section 3 to read, "The identification of sites to release will take into account the desired hierarchical distribution of housing completions as outlined in the JSP and to be developed through the Housing Development Plan Document (DPD). The current completion rates and existing consents will also help inform the decision to release particular sites."</p>
32	<p>In accordance with Local Plan policy Hook should be regarded as part of Goole rather than as a DS4 settlement.</p>	<p>The Local Plan states that it is difficult to separate the residential needs of Goole from Hook and that Hook's role is 'effectively as a suburb of Goole'. However, Policy S1 of the Local Plan identifies Hook as a 'non-selected' settlement</p>	<p>None.</p>
33	<p>The remaining stock at Snaith will ensure an average annual delivery from 1998 to 2009 at just over 20 per annum, which is regarded as satisfactory. There are no further Greenfield allocations anyway.</p>	<p>It is accepted that there are no allocated Greenfield sites still to release in Snaith.</p>	<p>None</p>

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34	<p>There is a position of historic under-supply in Howden and the 0-5 year supply represents less than a year's requirement.</p> <p>Although the supply from Greenfield sites exceeds the requirement to 2009, some delivery will be required from all sites within that period. This means the large site, allocation S22A, will need to be treated as a strategic site, providing necessary supply up to 2009 with phasing provisions for delivery during at least the first half of the LDF plan period.</p>	<p>The Sequential Approach including Table 1 (Table 6.4 – JSP), together with the supply position and the number of outstanding consents, will be used to inform the decision on the release of a particular site. A report will accompany the Sequential Approach which will consider relevant sites on all of these factors.</p>	None.
35	<p>All the sites are within the urban framework and must be all regarded as sustainable locations. A decision arises whether any phasing approach is necessary for the sites in Hook in relation to the sites within the development limit of Goole.</p> <p>Subject to that point the release needs to ensure delivery. That is best likely to be achieved on a first come first served basis with a reduced time limit being placed on the period for approval of reserved matters say to submission within six months of the grant of outline. Detailed applications should be given priority over outline applications. Applicants should be invited to set out delivery projections with their applications.</p>	See responses to ref 3 and 32.	None.
36	<p>The initial release should cover a minimum of four years requirement needs so as to ensure delivery up to the adoption of the LDF.</p>	<p>The annual update to the IPG states that Greenfield sites with the approximate capacity of 365 dwellings should be released in the Western JSP sub-area. This figure, together with outstanding consents and anticipated windfalls, has been calculated to provide for approximately 4 years of the Western JSP sub-area requirement. The position will be re-assessed annually as part of the plan, monitor and manage approach and in light of the emerging policies contained within the LDF.</p>	None.
Jennifer Hubbard (on behalf of several landowners in the Western JSP Sub-area)			
37	<p>Comments are partly informed by Table 4 of George Wright's response (see ref 31).</p>	Noted.	None.

Ref	Summary of response	Officer comments	Proposed changes to the Approach
38	<p>The fundamental objection to the approach is its reliance on a simple 'points' system used to produce a 'batting order' for the release of sites for development.</p> <p>There is no correlation between the size of a proposed housing site and the size/number of jobs available at proximate or more distant employment locations.</p>	<p>See response to ref 4 and ref 30. Employment concentrations have been calculated on the basis of current significant destinations of employment (destination data provided in the Census 2001) and potential future concentrations (i.e.. allocations in Local Plans) in conjunction with the Council's Economic Development team..</p>	<p>Add footnote to paragraph 3.27 to read, 'Key employment concentrations have been mapped using results from the Census 2001 (Origin Destination tables) and in conjunction with the Council's Economic Development team.'</p>
39	<p>There is uncertainty about the sustainability of existing schools in the East Riding. The proximity of a primary school does not necessarily suggest that the school is 'sustainable' or will be in the future.</p>	<p>Dialogue has taken place between the Forward Planning Unit and the Education Authority to ensure that their respective proposals do not adversely impact on one another.</p> <p>Consideration is given to both the proximity of the school and the ability to build communities (which may involve impacts on the local school) within the Sequential Approach. The Forward Planning Unit recognises that residential development does not necessarily support local services and the planning system cannot dictate where children go to school or whether residents of newly built properties will have children of school age.</p>	<p>None.</p>
40	<p>There is no correlation between the size of a proposed housing site and the quantum of local shopping which may be available whether under one roof or in various disparate locations within the settlement.</p>	<p>The term, 'convenience store' should be replaced by 'supermarket' to reflect the size provision likely to generate traffic. Retail studies reveal that most people shop at supermarkets for their main food shopping. This is incorporated within the scoring mechanism. The size of the housing site is irrelevant.</p>	<p>The term, 'convenience store' should be replaced by 'supermarket' to reflect the size provision likely to generate traffic.</p>
41	<p>GP premises are subject to change. Many surgeries serve more than one settlement. Are the settlements without surgeries to be considered inherently less sustainable than settlements without a convenience store? Which is the more frequently used facility?</p>	<p>See response to ref 30 ('transient' services)</p> <p>There are no settlements in the East Riding with a GP surgery but without a convenience store. The scoring system reflects that a convenience store (now changed to 'supermarket') is generally frequented more than a GP surgery by an individual.</p>	<p>None.</p>

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42	Is a site within or beyond – say – 800 metre of a train station providing access to a sub-regional employment area inherently preferable to a site within 400 metres of a small local employment area?	It is acknowledged that not everyone can find employment opportunities within their immediate locality. However, the scoring mechanism is an attempt to highlight those sites which are closer to existing local services and facilities. Employment in the locality also has associated benefits for the economic prosperity of the town and may help avoid 'leakage'. See also response to ref 147.	None.
43	Bus services have a high propensity to change both in frequency and in their routes in response to grants and subsidies.	See response to ref 30 ('transient' services)	None.
44	Table 5 is suggested to reflect the impact on traffic generation of the key destination points. What evidence is there to support this and the subsequent weightings? Traffic generation is not in itself an element, or determinative of, sustainability.	See response to ref 6. One of the key objectives of PPG13 is to reduce the need to travel, especially by car. By locating residential sites close to existing services, the need to travel by car, and therefore, contribute towards generating traffic may be reduced.	None.
45	The simple points system ignores 4 of the 5 criteria set out at paragraph 31 of PPG3. The (points system) approach fails to take account of the potential for improving accessibility to jobs, shops and services by modes other than the car; the capacity of existing and potential infrastructure; the ability to build communities, and the physical and environmental constraints to the development of the sites being addressed.	See responses to ref 4 and ref 30.	None.
47	The approach does not consider ownership constraints; whether the site can be developed economically or whether in any particular case a site may be proposed for single-type development or for the range of housing types required by the market.	See responses to ref 4 and ref 30	None.
48	Paragraph 3.21 suggests <i>additional weight</i> will be given to sites where the release will add to the sustainability of a community by supporting local services. How will this be incorporated into the simple points system and if developers are to demonstrate this, what criteria will submissions be considered against?	The additional weight relates to a subjective, but professional judgement not incorporated in the points system. Discussions with Housing Strategy, Economic Development and Members will inform this decision.	None.

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49	What is to be the definition of <i>major</i> in relation to paragraph 4.1? Will the same distinction between major and other sites also apply to Greenfield windfall sites under paragraph 4.2?	The term 'major' is superfluous in this instance.	Remove the word, 'major' from paragraph 4.1.
50	Is it appropriate to a make a distinction between allocated sites which have already undergone a thorough examination process, and windfall sites? That is to say, should non-allocated sites be subject to more rigorous assessment?	<p>The Sequential Approach attempts to draw together the latest policies with regards to identifying sustainable locations for residential development. The Council is not looking to allocate any sites through this process. However, if any non-allocated Greenfield sites come forward that perform equally or better than those sites identified for release, then a judgement will be made about whether the release of that site at that time would risk undermining the strategy.</p> <p>This is covered by paragraph 4.3 in the Sequential Approach.</p>	None.
51	In summary, the points system advocated is not robust and leaves too many important aspects of appropriate/suitable residential development which are essential to a rounded and comprehensive sequential approach, unresolved.	See response to ref 4 and ref 30.	None.
52	<i>Alternative approach</i> – Owners/potential developers of allocated and Greenfield windfall sites to submit their own appraisals to the Council of the sustainability, availability and other positive planning aspects of their sites in the context of RSS, JSP and PPG3 paragraph 31 policies and criteria.	See response to ref 3.	None.
53	Landowners and interested parties should be given a period of 8 weeks to submit bids which would be compared by the Council on the basis of very much more detailed information than that which will be the outcome of the paragraph 3.35 points scoring system with added (but as yet unknown) values.	See response to ref 3.	None.
54	<p>This would 'flush' out a great deal of comparative information about potential housing sites which the Council does not hold and could not acquire by the application of the points system. Practical availability/ownership constraints would also be identified.</p> <p>This course of action is unlikely to take any longer than the procedure set out in the Sequential Approach.</p>	See response to ref 3.	None.

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55	<p>In table 4 [attached to letter – part of George Wright submission], there is an over provision of 96 dwellings in the non-DS2 and DS3 settlements, of which 81 are on sites with consent but not started and 14 are on Brownfield sites. The planning permissions relating to sites with consent but not started should be reviewed against the criteria of PPG paragraph 31 if the permissions are proposed to be renewed or lapse.</p>	<p>An application for a renewal of planning permission is always reviewed thoroughly against the prevailing Development Plan (and Government guidance).</p>	None.
56	<p>Otherwise, it is not necessary to restrict the development of brownfield sites within the smaller settlements unless:</p> <ul style="list-style-type: none"> • The sites are so large that they would risk undermining the strategy for housing provision in the sub-area, or • They perform so badly in terms of accessibility compared with Greenfield sites elsewhere, that their development should be resisted. 	<p>Proposals for the development of PDL will be determined in accordance with the Development Plan, which includes the JSP (i.e. development strategy and housing requirement).</p>	None.
57	<p>Permissions should continue to be granted for brownfield sites in the ‘below DS3’ settlements and should not be counted against the JSP sub area requirements in calculating the need for the release of sites in the DS2 and 3 settlements.</p> <p>Other than in the two circumstances above, the development of brownfield sites is an element of sustainability and is entirely compatible with the main thrust of RSS and JSP strategy which requires <i>most</i> new residential development to be concentrated in or on the edge (in this instance) the larger settlements of Goole, Howden and Snaith.</p>	<p>In the absence of a Smaller Settlements DPD, proposals will be determined in accordance with the Local Plan. Housing development in DS4 areas should be limited in scale and meet an identified local need.</p> <p>The housing requirements set out in the JSP relate to all PDL and Greenfield development in all settlements. The LPA will attempt to ensure that completions in settlements ‘below’ DS3 will not compromise the development strategy and housing requirement set out in the JSP.</p>	None.
58	<p>An annual average house completion rate presumes year on year variations and there is no need therefore to restrain development which meets the main thrust of Development Plan strategy because short term oversupplies of land might occur through the development of brownfield windfall sites in the smaller settlements. Both are elements of government policy and are not in competition.</p>	<p>The LPA must plan, monitor and manage the number of housing completions. It is acknowledged that there may be year on year variations and the LPA will continue to revise the requirements in light of the Housing Land Position Statement and the provisions laid out in the most up to date RSS.</p>	None.

Ref	Summary of response	Officer comments	Proposed changes to the Approach
59	It will be necessary for the Council to make a judgement on the comparative benefits and disbenefits of meeting the requirement through the development of a large number of small sites (which may or may not be within DS2 and DS3 settlements) with a small number of larger sites where the opportunities exist to strengthen existing and/or create new communities.	Noted.	None.
60	We anticipate that the policy approach eventually adopted will take into account the contents of the July 2005 consultation paper <i>Planning for Housing Provision</i> and the contents of (anticipated) draft revised PPG3.	Noted. The Sequential Approach will continue to be reviewed in light of new policies and guidance.	None.
JVH Town Planning Consultants Ltd			
61	We broadly support the sequential approach to the managed release of Greenfield sites in the western sub area.	Noted.	
62	The access criteria fails to consider cycling, this is an important mode of transport (esp. in this area – topographically suitable). The potential to substitute short car trips particularly under 5km as identified in PPG13 should be factored into the access matrix. The proximity of sites to dedicated cycle routes should be scored accordingly. [example of scoring provided].	It is acknowledged that the Western JSP sub-area benefits from low-lying land and is ideal for cycling (which the Census 2001 reveals). However, a criterion accommodating a large distance of 5km would not help to distinguish between the most sustainable site in reference to the ‘Access to Services’ criteria.	None.
63	The propensity of the use of alternative sustainable modes of transport is also considered important. It is considered that a high quality environment including a good footpath that is well lit and attractive is far more likely to be used in this way than a route through a threatening area crossing many busy roads. This should also be considered and scored accordingly.	This would involve a major survey of all footpaths in the Western JSP sub-area and a continued revision in conjunction with the Council’s maintenance programme. Although an important factor, it cannot be incorporated into the Sequential Approach at this time.	None.
Brown & Co			
64	Land north of Bridge Farm, Broomfleet to be considered for release [Plan attached for information]	This has been registered and acknowledged as a ‘Land Bid’ for consideration in the Local Development Framework.	None.

Ref	Summary of response	Officer comments	Proposed changes to the Approach
Snaith and Cowick Town Council			
65	<p>The Town Council strongly objects to the release of residential Greenfield sites in the western JSP sub-area for the following reasons:</p> <p>The Town Council would wish to know, why only the Western sub-area has been identified for the release of Greenfield sites and is concerned that the area is being treated differently to the rest of the County. It is in fact an area rich in agricultural usage.</p>	<p>The Third Annual Update into the Managed Release of Greenfield Residential Sites demonstrated that there is a need to release Greenfield land in order to plan for the housing requirements set out in the JSP in light of the existing supply.</p> <p>The ‘shortage’ pertains to the planned requirement for the Western sub-area, taking into account the changing demographics of households, the quality of existing housing stock and the desire to focus development – in conjunction with economic and infrastructure growth – in the most sustainable locations.</p> <p>Other JSP sub-areas were calculated to have enough commitments and PDL supply to meet the requirements for the medium term.</p>	None.
66	<p>It has been proved by the two recent housing developments in Snaith, that due to the lack of services and facilities, new residents use our town as dormitory.</p>	<p>Snaith is identified in the JSP as fulfilling the role of a Town. Therefore, it should function to provide the focus for local housing, employment activities, shopping, cultural and community facilities and transport services for the town and its hinterland. The town should support and complement the Principal Town in the sub-area.</p> <p>It is anticipated that the development of services and facilities in the future will match the residential developments of the recent past in order to enhance the sustainability of Snaith.</p> <p>See also response to ref 33.</p>	None.
67	<p>It would appear from the document, that housing developments should be directly proportional to the transport services available. Snaith and Cowick has few transport links. [A summary of transport links is provided]</p>	<p>Transport and access is a consideration that will be taken into account in the application of the Sequential Approach.</p>	None.

Ref	Summary of response	Officer comments	Proposed changes to the Approach
68	When the release of Greenfield sites is under consideration, the Town Council would request that ERYC retain the policy contained in the Boothferry Borough Local Plan which stated that a green belt should remain between Snaith and East and West Cowick.	Planning applications will be considered against the Development Plan, which includes the Local Plan. The managed release of Greenfield sites for residential use will consider the appropriate constraints including those included in the relevant Local Plan policies.	None.
Alliance General Property Developments Ltd.			
69	Maximizing the reuse of previously developed sites seems to assume that those sites are more sustainable than new sites. This may not always be the case.	Each application for residential development on PDL will be considered on its own merits. The sustainability of an individual site is part of this process.	None.
70	The 'ability to build communities', schemes that offer an enhancement to the community should be preferable to those that simply bolt on to existing facilities.	A judgement will be made on this criterion for the Sequential Approach. The Council may produce a Concept Statement (short development brief) for each site it wishes to release which will establish, amongst other things, the objectives of the development in respect of enhancing the existing community.	None.
71	Sites on major transport links should be looked on favourably as this will help to reduce private car use.	The DS2 and DS3 settlements of the western JSP sub-area are on the Strategic Public Transport Network. The importance of a transport link will be considered as part of the constraints criterion (especially for DS4 settlements). Policy H3 of the JSP sets out a sequential approach where sites around nodes in good public transport corridors should be considered.	None.
72	Public transport is the key to future development to ensure sustainability. Some urban extensions may be closer to day-to-day facilities than urban developments. Also new developments may offer new facilities.	The Sequential Approach incorporates a measure to look at the relative locations of day-to-day facilities within a settlement. It is noted that new development may offer new facilities.	None.
73	PPG3's recommendation to develop sustainable locations and reduce car travel distances is a realistic way forward considering the future impact of car journeys on the environment due to population increase.	Noted. The proposed Sequential Approach reflects this.	None.

Ref	Summary of response	Officer comments	Proposed changes to the Approach
74	<p>In response to Policy H2, cited within the document:</p> <p>a) i) Previously developed land is not necessarily in sustainable locations</p> <p>iii) Land adjacent to transport links and interchanges (such as park and rides) should be prioritised as car travel distance can be minimized.</p> <p>v) It is important to provide land on transport links that are sustainable currently and not just satellite links that may disappear as the market and use changes.</p> <p>b) New developments that seek to enhance the existing community must be preferable over developments with no contribution.</p>	<p>Policy H2 mentioned is the policy within the RSS. See response to ref 69.</p> <p>Noted.</p> <p>The development strategy focus of the JSP is a long-term ambition for the East Riding settlements, which attempts to enhance/maintain the sustainability of the identified settlements. See also response to ref 71.</p> <p>Noted. See also response to ref 70.</p>	None.
75	<p>Table 1: It is important to note that some sites on the edge of a development such as an urban extension so long as it is on a transport node may be far more sustainable than infill sites or previously developed sites which may be in a less sustainable position and have fewer public transport links.</p>	<p>Noted. See also responses to ref 69 and ref 72</p>	None.
76	<p>It is wrong to dismiss developments that do not fall in the DS1, DS2, DS3 areas. I understand the overriding principle is on sustainability grounds. But each and every development should be considered against the sustainability framework and tested on its own merit. Sustainability is the key to future development and therefore we should rid ourselves of the concept of development boundaries as the first test to allow future development.</p>	<p>Development in DS4 settlements will be considered against the policies of the adopted JSP. DS1-3 settlements have been identified because of their existing infrastructure and services, as well as their role with regards to surrounding villages.</p>	None.
77	<p>DS4 areas should also be allocated on sustainability terms. Most villages are full of urban commuters and this cannot be avoided. To this end it is better to allocate DS4 status to those villages close to the urban employment centres to ensure the minimizing of car travel distances.</p>	<p>The focus in the short to medium term is to not exacerbate the pattern of commuting and unsustainable movement. Significant releases in the DS4 settlements would undermine the JSP development strategy. The identification of DS4 settlements is not part of this exercise (a Smaller Settlements DPD is currently being prepared) and the future allocation of residential sites is a matter for the Housing DPD. .</p>	None.
78	<p>As previously stated previously developed land should be tested against the sustainability issues as urban extension sites rather than prioritising merely on past use.</p>	<p>See responses to ref 69 and ref 72</p>	None.

Ref	Summary of response	Officer comments	Proposed changes to the Approach
79	I agree that settlement boundaries need no longer be considered once the sustainability measure is used.	The Development Limits are still in place. Greenfield sites outside of these limits are likely to be windfall sites and will need to meet the same sustainability tests. See also response to ref 49.	None.
80	I agree that sites should be free of constraints. However I disagree that physical constraints are necessarily an issue as most physical constraints can be engineered away. e.g. flood protection can be provided on or off site very simply. Also most of Hull and surrounding area is on a flood plain below 5m AOD and therefore to use this as a constraint would be unfair considering the ease of mitigation.	The Council will rely on expert advice on the issue of constraints (e.g. from the Environment Agency on flood risk). The issue concerns whether constraints can be overcome in an economic, satisfactory and timely manner. See first sentence of paragraph 3.18.	None.
81	Building communities to support infrastructure and support services should be balanced against providing new development close to existing facilities that due to their position and size are more sustainable. i.e. urban extensions would be advantageous as the existing infrastructure is serviced by a greater catchment and therefore less likely to disappear with time and economic constraints.	The JSP makes it clear that, all things being equal, urban extensions in identified settlements (DS1-3) should be developed before satellite villages (which are good public transport nodes).	None.
82	The adjacency of a proposed development to a major city should be prioritised. This will guarantee reducing car travel distances. Outlying villages will always generate car travel as people aspire to live in these areas. Therefore producing new “suburbs” (urban extensions) is preferable to developing satellite villages.	See response to ref 81.	None.
83	I agree that developing near employment centres should be prioritised.	Noted.	None.
84	I agree that developing near existing primary schools is important. It should also be noted that the size of the school can always be increased to accommodate increased numbers and this often leads to better education.	Noted. See response to ref 39.	None.
85	Many service stations have become the local shop for the odd item. Most families however do the majority of the shopping in the large superstores and therefore developments close to these superstores should be prioritised (additional prioritisation should be given if there is a public transport link between the two).	See response to ref 40 & 41	The term, ‘convenience store’ should be replaced by ‘supermarket’ to reflect the size provision likely to generate traffic.
86	I think consideration should be given to public transport links between the health centre and the development. However a weighting should be applied as the frequency of visits to a health centre are normally far less than the other journeys.	Access to health and public transport is considered within the scoring mechanism, though a link is not made between the two. An indicator along the lines suggested by the respondent may over-complicate the objective criteria.	None.

Ref	Summary of response	Officer comments	Proposed changes to the Approach
87	Frequency of buses (and the sustainability of that frequency) should be added into this equation as this effectively increases Public Transport use due to the increase in convenience.	See response to ref 28.	None.
88	I think the weighting of a distance to a GP is far too high. By your weighting for every 6 times you visit work or 5 times you go to a shop you visit the GP 4 times. I think this is an unrealistic assumption.	The weighting of a distance to a GP is the lowest of all the given destinations. Depending on the demographics, the propensity to visit each destination varies. It is felt that GPs are an essential part of a sustainable community and that sites should be awarded adequate points to reflect this.	Add paragraph after 3.35 to read, 'Access to a GP, although important, is not awarded as many points as the other destinations due to the number of times an individual may visit relative to other destinations.'
89	I agree that sites should be allocated by this approach and that sites should be released if they match or score better than existing released sites. In this way sustainable sites will gradually become the norm. Consideration should also be given to comparing sites across Areas i.e. what if sites in the central area show to be far more sustainable than western area sites. This should be taken into account to truly adopt a regional sustainability strategy.	Noted. The current Sequential Approach relates to the Western JSP sub-area only. The sub-areas are partly informed by the travel to work areas, housing markets and environmental factors, amongst other factors. Therefore each sub-area is considered individually and has its own housing requirement based on the overall development strategy.	None.
90	In policy DS4 you note that villages should function as a recreational resource. Also development should meet local needs and contribute to sustaining the role. Therefore new developments that add value to the community should be considered above those that merely add population.	Policy DS4 seeks to ensure any development in these settlements meets the needs of the local community.	None.
Hutton Cranswick Parish Council			
91	Surely a site release should be subject to an analysis of environmental quality and only go forward in positive circumstances. A purely 2-dimensional approach will not improve physical mediocrity.	This is considered within the Sequential Approach (see paragraph 3.18).	None.
92	Amongst the many physical aspects of site selection, these are a few suggestions: Appropriate introduction to a settlement?	The Council may produce a Concept Statement (short development brief) for each site for release to ensure that the objectives and design of the development are appropriate to the location. Additional Local Plan policies will apply regarding design issues.	None.
93	Complementary to the form of a historic settlement?		
94	Is a strong contrast needed between open countryside and an existing urban area?		
95	Does an urban area need a change of physical identity to relieve existing monotony or will a site merely increase this (much will depend on the size of the site)?		

Ref	Summary of response	Officer comments	Proposed changes to the Approach
Howden Civic Society			
96	The year-by-year assessment of housing needs has to take place against a longer-term look at the town of Howden. The situation each year could then be examined and progress assessed to see if this fits into the overall plan. It would seem that the budgetary system would probably be unable to cope with the short-term year-by-year changes.	The house completion figures and existing supply numbers for each parish is considered on an annual basis in the context of the longer-term strategy set out in the JSP and Local Plan. Releases are then made so that developers can plan with some certainty on whether they will obtain consent.	None.
Wressle Parish Council			
97	Wressle Parish Council has no particular comments to make. Their expectation is that ERYC will use its discretion to the benefit of its citizens when releasing such development land.	Noted.	None.
Langtoft Parish Council (individual Councillor responses)			
98	It is hoped that the release of Greenfield Sites will be very much a 'last on the list' for future development. The roads in East Yorkshire were not built to sustain large development. Bridlington's access roads are more like a great car park in the summer months and especially school holidays.	Noted. The sequential approach within PPG3, RSS and the JSP ensures that PDL is considered before Greenfield infill and urban extensions. The calculations show a planned shortfall in the Western JSP sub area against the requirements.	None.
99	Planning appears to overlook that more houses mean more people and a lot more cars.	One of the fundamental objectives of the Sequential Approach is to reduce the need to travel by car, and promote opportunities to access services and facilities by alternative, more sustainable modes of transport.	None.
100	Our villages, which have also grown, rely on towns such as Driffield, Bridlington, Beverley and Pocklington for most of their daily needs. Please don't keep eroding a very special way of life in the countryside and small towns of East Yorkshire.	The development strategy of the JSP attempts to focus development on the Principal Towns and Market Towns such as Bridlington, Driffield, Beverley and Pocklington. Only development of a limited scale to meet local needs will be allowed in rural villages. The focus of development is for the JSP DS1-3 settlements such as Hull and the Towns.	None.
101	If village life and countryside is eaten away by development, scenic routes and tourism will be lost. Employment in East Yorkshire will be further reduced.	See response to ref 100.	None.
102	Leave our countryside/Greenfields free from developments so not only residents of these areas but also visitors can enjoy our clean air and fresh countryside.	See response to ref 98.	None.
103	Many inner cities are like ghost towns and have properties which can be made into residential accommodation rather than building new housing estates. Greenfield sites need to be protected as green fields.	See responses to ref 98 and ref 100.	None.

Ref	Summary of response	Officer comments	Proposed changes to the Approach
104	The infrastructure is already in place to expand the local major towns of this area (i.e. Hull, Driffield, Bridlington, York). Hull in particular – with huge areas that are boarded up completely stagnant. It would be an ideal opportunity to rejuvenate these areas rather than Greenfield sites.	See responses to ref 98 and ref 100.	None.
105	Villages should be the last areas to be considered until all existing areas such as brownfield sites are exhausted in towns.	See response to ref 100.	None.
106	If an area grows, so does its problems, problems such as drugs and lawlessness will occur and the problems will overburden the police, schools, doctors and dentists.	Necessary infrastructure (both physical and social) and facilities are permitted in settlements where a need is demonstrated. The Sequential Approach will look at the current (and planned) infrastructure to see if it has the capacity to accommodate additional growth. See paragraph 3.18.	None.
108	Maybe measures should be brought in to make owners of redundant and derelict property and brownfield sites make their sites available.	The focus in planning has shifted towards developing PDL as a priority, which has acted as an incentive to encourage development of PDL.	None.
109	The policy raises concern as it appears to be driven by the need to meet Central Government targets and the fact that it is a joint structure between Hull and the East Riding. The concern of small rural villages is that it will be swamped by the views and concerns of Town Planners disregarding the views of the rural community. This is evidenced by the scant regard for Parish Council views in the system that now exists.	See response to ref 100.	None.
110	Also have concerns that countryside should function as a structure and viable environment when current planning seems to permit anything and everything.	See response to ref 100.	None.
111	Have road safety concern both in and around the villages as the road system is not adequate for the volumes of traffic already in existence without further building the volume of traffic.	Only limited scale development to meet local needs will be permitted in the smaller settlements not identified in the JSP. This is unlikely to have major impacts on the volume of traffic, though these factors would also be considered at the application stage.	None.
Hull City Council			
112	Overall, we support your efforts to follow-up the managed release of housing sites in a consistent way by using the JSP as a reference.	Support welcomed.	None.

Ref	Summary of response	Officer comments	Proposed changes to the Approach
113	Site releases should be subject to making it very clear that Goole is the most sustainable location and should be in priority (especially for large sites).	Paragraph 3.6 of the Sequential Approach sets out the desired dwelling distribution that the LPA should aim for. It clearly highlights Goole (Principal Town) as the most sustainable location for development, and with the highest proportion of dwelling development.	None.
114	Site release should be subject to close monitoring to ensure shift actually occurs in the balance of development. Past rates show unsustainable patterns of development taking place. It would be useful to indicate why, so that planning documents can realistically set out what can be achieved in the future i.e. the imbalance is partly due to the fact that Goole does not deliver and we acknowledge that time is needed for the regeneration to finally make Goole a place which attracts more investment. More development is needed in Goole and less in the DS4 settlements.	Table 4 of the Sequential Approach outlines the recent development distribution by settlement type (DS2-4). Commentary on past completion rates and distribution is provided in the annual updates of the IPG. The Sequential Approach has been developed to help realise the objectives of the JSP as well as improving conformity with PPG3. It is not thought necessary to re-state the aims of the JSP in this document.	None.
115	It would be useful to explain how the sequential approach as set out in PPG3 and JSP reconciles with table 3. Presumably, the table indicates what the application of the sequential approach is likely to lead to in the Western sub-area. Given that relatively small amount of land is already taken up in this area, the scope for achieving sustainable patterns of development is significant.	Table 3 originally set out an annual desired distribution by settlement in the Western sub-area (taken and amended from the 'Issues and Options' paper). The Issues and Options figures are a suggested distribution for the whole of the JSP programme (until 2016). The calculation of the distribution figures are beyond the scope of the Sequential Approach (to be determined through the Housing DPD), though it must take into account the hierarchy of the Development Strategy as set out in the JSP. See response to ref 31	None.
116	The proposed bracket for development in DS4 settlements is too large. There is 13% of housing land (Western sub-area) already committed in the DS4 settlements, so the top end of the bracket should not be more than 20%. Looking at the past relative completion rates in the different types of settlements, it is all the more important to apply this restriction as far as possible/realistic, in order to reach a better and more sustainable distribution of residential development.	See response to ref 115. It is likely that Greenfield releases will only be required at present in Goole and Howden and not in the DS4 settlements. The balance of housing provision between the different levels of the settlement hierarchy to 2016 will be addressed in the Housing DPD.	None.

Ref	Summary of response	Officer comments	Proposed changes to the Approach
117	Paragraph 2.13, 1 st bullet point: previously-developed land will continue to be approved <u>subject to</u> (not 'in accordance to') the Development Plan. Development of PDL should be welcome but not as long as the number of dwellings coming forward is not higher than JSP requirement levels and that such proposals do not undermine the JSP strategy.	Section 38(6) of the Planning and Compulsory Purchase Act requires applications to be determined in accordance with the development plan unless material considerations indicate otherwise. Otherwise agree.	None.
Fangfoss and Bolton Parish Council			
118	This isn't immediately applicable to our area YET. The approval seems reasonable and logical, if you can cut your way through the 'gobbledygook'.	Noted. Unfortunately the Sequential Approach is a specific planning tool to be used in certain circumstances, which involves certain terminology. The terms used are to ensure there is little room for misinterpretation.	None.
119	Policy H2 (b) is a joke. Recent housing has not met local needs, and has not conserved the character of the village. JSP Policy DS4 is also a joke.	These are relatively new policies (RSS adopted in December 2004, JSP adopted in June 2005), which will hopefully set the context for more responsive and sustainable planning decisions in future.	None.
120	DS5 – provision of essential infrastructure in water disposal is already under pressure. These problems have always been ignored by the Planning Authority.	This issue can be particularly acute outside the DS1-3 settlements. The Council will continue to liaise with Parish Councils and the relevant utility companies before releasing sites for development.	None.
121	Interesting to note the requirements from points 3.16 to 3.35 especially comments in 3.29 to shopping and the footnote referring to the 'Eurostat' definition of a supermarket. Also, comments in 3.30 with access to a GP noting no comments for access to a dentist.	Noted. Access to a dentist is not included in the assessment as they are more limited in number than GP surgeries. There are also mobile dentist units in the Howdenshire area which make it difficult to measure access.	None.
Barratt York Ltd (prepared by George Wright) – see also refs 29-36			
122	[The submitted document is an updated supporting statement for the allocated site S22A (Selby Road/Station Road, Howden). The salient points (in addition to refs 29-36) raised within the document are detailed below].	Noted.	None.
123	Although the submission flags up the theoretical need for a Sequential Approach, it concludes in the case of Howden, as all the allocated sites are needed in the supply process, no sequential test arises.	Housing requirements are established in the JSP and the completions and supply are monitored through the IPG annual review at the sub-area level. To ensure consistency and transparency, as well as to effectively plan, monitor and manage the housing supply, the Sequential Approach needs to be applied to the whole JSP sub-area.	None.

Ref	Summary of response	Officer comments	Proposed changes to the Approach
124	National policy governs that a 5-year forward supply should be identified. The Sequential Approach should be used to identify those sites available for immediate release.	Prevailing national planning guidance (in 'Planning to Deliver') requires that authorities identify sufficient sites to achieve the (strategic) housing requirement. The Local Plan did this. This matter deals with the release of some of those sites in accordance with the need to 'Plan, Monitor and Manage' housing provision. The proposed Sequential Approach is an interim measure to identify sites for immediate release. The position will be reviewed on an annual basis until such time as when the LDF can establish a new approach based on a review of allocations.	None.
125	<p>Because no basis for an apportionment of the requirement/supply has been made by the LPA, this submission considers that issue and proposes a considered view on the likely outcome. [Schedule 1 (attached to submission) establishes a methodology for apportioning housing distribution. It considers the distribution of the population; the projected growth levels and focus; and the need to adjust distribution having regard to the actual outcomes from 1998.]</p> <p>See also ref 31. Proposed distribution: Goole 150, Howden 60; Snaith 20; DS4 Settlements 20.</p>	<p>An apportionment of the requirement will be developed through the Housing DPD. The Sequential Approach will need to ensure that any releases do not undermine the Development Strategy of the JSP and take due consideration of the existing supply position in each of the Western JSP sub-area settlements.</p> <p>See also response to ref 31.</p>	See proposed changes to ref 31.
126	<p>In the review of the IPG in relation to Howden it is proposed consideration should be given to a five year supply in relation to an annual requirement of 60 units i.e. to identify a supply for 300 units.</p> <p>This figure is considered to be the most conservative allocation. It could range from 66-80 p.a. depending on economic growth and provision in Snaith.</p>	See responses to ref 31, 124 and 125.	None.
127	The housing supply figures (HLPS 2004 version) for Howden show around 18-24 [9 months using HLPS 2005] months supply [based on the proposed distribution]. That approach requires the release of and delivery from all sites identified except the submission site.	Noted. Delivery from all sites in Howden (except the submission site) would provide around 123 dwellings.	None.
128	There will be a requirement, in order to provide the necessary delivery at Howden, to generate development from all of the sites identified in the HLPS within the immediate five year forward plan.	See response to ref 34.	None.

Ref	Summary of response	Officer comments	Proposed changes to the Approach
129	The delivery from the submission site will be required by the 1 st April 2007, even if the release of the site is approached on the basis of last resort.	The submission site S22a is an extension to Howden, which is defined as a Town. Table 1 (Table 6.4 of the JSP) of the Sequential Approach states that extensions to Principal Towns (Goole) should be developed before extensions to Towns. There remains substantial capacity on infill sites in Goole and on extension sites to Goole that would be 'sequentially preferable' to the submission site.	None.
130	The planning process will take at least two years to address the planning issues for the submission site before any delivery can be secured.	Noted.	None.
131	The supply review leads to the conclusion that the submission site needs to be released from the moratorium immediately.	See response to ref 129.	None.
132	In the absence of the 5+ year sites from the HLPS, there should be a shortfall and so that additional supply has to be considered and related to a sequential test.	The July 2005 Cabinet report considered the number of houses to be released in the sub area.	None.
133	With the exception of the submission site there is only two years identified and projected supply including the sites in the 5+ years Table of the HLPS. The submission site is a major site which will require a lead in time of at least 2 years for the planning process. It should therefore be released from the moratorium with immediate effect to achieve delivery post March 2007.	See response to ref 129 and 132.	None.
134	With a total of identified and projected supply, excluding the submission site, not providing the necessary adequate delivery over the 5 years and a 2 year minimum period to establish delivery from the submission site, there is no need for a more detailed sequential test to be applied to the sites at Howden. The submission site can be phased to deliver the balance of requirement for 5 years and will continue into the next 5 year period with annual delivery at a similar rate until the site is completed.	See response to ref 129 and 132.	None.
135	Because the release of the submission site as forecast within this submission is made strictly on the basis of a release necessary to secure the housing delivery at Howden and that the approach ensures that an appropriate delivery can be made in the other locations of the Western JSP sub-area at the same time, the release of the submission site will not undermine the plan strategy in relation to the regeneration of Goole.	See response to ref 129 and 132.	None.

Ref	Summary of response	Officer comments	Proposed changes to the Approach
136	The submission continues with site specific objectives and planning process details.	These are not relevant to the Draft Sequential Approach document at this current time.	None.
Members of the Public			
Kester Dean, Goole			
137	The document indicates that 100-125 new houses will be developed in Goole per annum. This is likely to be a very hot potato locally. I am already receiving information about sites in Goole North where developers are moving ahead of the draft Sequential Approach in order to take advantage of the benefits to them that they believe it will bring. This is not very helpful and could be setting up a potential PR disaster.	No Greenfield sites will be released until the Sequential Approach has been finalised with amendments via this exercise. Developers have been invited to provide comments on the draft Approach.	None.
138	I am not aware of anyone ever having shown that there is a housing shortage in Goole. As far as I can see, anyone with financial backing can get a property.	See response to ref 65.	None.
139	People without financial resources, and especially young people, are often unable to access a home, not because of a shortage of houses, but rather because they cannot afford one. How will the Sequential Approach help them?	The Council has adopted Supplementary Planning Guidance for Affordable Housing in the East Riding, which sets out the proportion of affordable housing that should be provided within residential proposals of a certain scale. However, There is currently no requirement to provide affordable housing as part of large residential applications in Goole. The Sequential Approach will not address this. It is a matter for the application stage.	None.
140	How many of the 100-125 houses allocated for Goole p.a. are intended to be: <ul style="list-style-type: none"> • Affordable accommodation for pensioners • Affordable accommodation for first-time buyers • Affordable accommodation for single people and couples both to buy and rent. 	See response to ref 139. This would be a matter for the application stage.	None.
141	Could we please have an additional two sequential steps where developers would get extra points if they came up with balanced schemes that include the above elements and get even more points if they come up with facilities for young people.	The Council would encourage well-designed proposals sensitive to the needs of the community (which may include the needs of young people). See also response to refs 92-95.	None.

Ref	Summary of response	Officer comments	Proposed changes to the Approach
142	I would be looking for the bigger, more expensive houses to go to the Goole South ward, where community balance could be achieved. It would be difficult to justify these types of homes in Goole North, where more affordable housing could be provided.	The majority of Greenfield sites within Goole are located on the eastern and southern edges of the town. Paragraphs 3.20 and 3.21 discuss the need for developments to help achieve a balanced community. It is likely that the mix of housing will be a key determinant in meeting this aim and the Council will encourage applications that attempt to integrate with the current community.	None.
143	<p>The waters get muddy where 'infill sites' have been recently created by other Greenfield schemes, and are in fact, quite a distance from the existing services and facilities.</p> <p>Please could the guidance be modified to include a more sophisticated analysis of 'infill'? The new definition should specifically exclude any 'infill' sites that have been created in the last, say fifteen years by Greenfield development. Such sites could be reclassified as 'extension reinforcements' rather than 'infill'.</p>	Noted. One of the Sequential Approach criteria is the proximity of existing services and facilities. This may reveal 'old' infill sites to be more sustainable than 'newly' created infill sites.	None.
Unknown			
144	Is this draft based on the same format and criteria for the assessment of Brownfield land? If not, is it the intention to do so, before the final prioritisation of Greenfield release?	<p>The scope of the Sequential Approach does not cover the assessment of Brownfield land. However, existing Development Plan policies apply to any proposals to develop PDL. Policy DS6 of the JSP states that priority will be given to development that has a high level of accessibility for people walking, cycling and using public transport, particularly for uses that generate and attract a high level of trips. Priority will also be given to development that brings wider economic, social and environmental benefits for the local community.</p> <p>See also responses to ref 56, 65, 69 and 98.</p>	None.
145	In considering the issues of building communities, services and facilities, greater emphasis should be given to which sites can offer added value in addition to assessment purely in line with localised pre-existing conditions.	Noted. This is difficult to anticipate at the release stage (Sequential Approach).	None.

Ref	Summary of response	Officer comments	Proposed changes to the Approach
146	Recent appeal decision [Swanland] suggests alternative views on the interpretation of sustainability. Less emphasis is placed on immediate localised employment and increased traffic generation. These matters should be considered carefully in determining the hierarchy of any scoring pattern.	<p>The measure of sustainability was made at the settlement level for Swanland. The Sequential Approach attempts to measure sustainability at the site level (in line with recommendations in PPG3) as it is likely that the settlements containing sites for release have already been identified as being sustainable through the JSP process.</p> <p>See also response to ref 22.</p>	None.
147	It would be helpful to have more background on the evaluation of the various elements of the 'scoring' proposed.	<p>Additional narrative on the weightings used for the scoring elements should be provided.</p> <p>It should be noted that the scoring relates to 'access to services' only and this forms just one criterion of the overall Approach.</p> <p>See also responses to ref 4 and 30.</p>	<p>Provide additional background on the weightings used for scoring after paragraph 3.35:</p> <p>The need to access employment and primary education is an almost everyday event, which accounts for a large proportion of the traffic on the East Riding's roads. This is reflected in the scoring system by ensuring that those sites located close to employment concentrations and primary schools are awarded maximum (3) points.</p> <p>Trips to the supermarket generate significant levels of traffic, though most people visit these shops on a less frequent basis than they would their place of employment/education. Retail studies conducted within the East Riding reveal that most people shop at supermarkets for their main food shopping. Supermarkets have therefore been chosen in preference to individual stores (i.e. butchers, bakers). As a result, the weightings are such that a site within 400m of an employment concentration is awarded more points than a site within 400m of a supermarket.</p>

Ref	Summary of response	Officer comments	Proposed changes to the Approach
			<p>Public transport can provide access to all the destinations included within the scoring mechanism. The proximity of a site to a current bus stop is awarded as much weight as access to employment and education as this is a more sustainable form of transport than the car. A bus stop will only be included within the calculation if there is a regular service (5 days a week) and that the service coincides with the start and finish times of most employers (service before 9am and after 5pm). The proximity of a train station does not have equal weighting to that of a bus stop because of the longer journey times and the more limited frequency of train services in the East Riding.</p> <p>Access to a GP, although important, is not awarded as many points as the other destinations due to the number of times an individual may visit relative to other destinations.</p> <p>The scoring system illustrated in Table 5 relates to the 'Access to Services' criterion only. This is an analysis regarding the proximity of a site to existing services and facilities. The decision to release a site is based on both objective and subjective criteria as detailed in PPG3, paragraph 31.</p>
148	The analysis sheet does not clearly demonstrate the primary elements of delivery. They appear almost insignificant to the 'scoring elements'.	See responses to ref 4 and ref 30.	None.

Ref	Summary of response	Officer comments	Proposed changes to the Approach
149	If this does result in the adoption of the analysis sheet referred to (in whatever form this may be), is this intended to be published within a future composite 'Housing Land Position Statement' document? Will this also reduce the 'Statement of Conformity with PPG3' currently required by ERYC with all planning applications?	<p>The analysis sheets are not anticipated to be published within the Housing Land Position Statement (HLPS) document, however records of sites identified for release will be made available on the Forward Planning website. Those sites identified will generate a figure in the '0-5 years' 'Remaining Capacity' column of the HLPS. Analysis sheets will be available upon request from the Forward Planning Manager.</p> <p>The Sequential Approach will not affect the 'Statement of Conformity' requirement, but in completing that form applicants may refer to the Council's decision to release a site.</p>	None.
Richard Byron			
150	No Greenfield sites should be released until all Brownfield sites have been developed.	See responses to ref 98 and ref 137.	None.
151	All larger developments over 15 houses should have a proportion of those dwellings designated as affordable housing.	See response to ref 139.	None.
152	Pocklington: building should all be on Brownfield land. Market Weighton and Driffield have spare land available and more building should be done there over the next ten years.	The Sequential Approach will not be applied to the Northern JSP sub-area for the time being. Calculations as part of the annual update of the Managed Release IPG show that there is enough committed land and outstanding supply to meet the housing requirements for 6 years (as at April 2005). The development strategy of the JSP supports the respondent's statement.	None.
153	If Greenfield release is needed in the next ten years in the Western JSP sub-area, it should be as near as possible to A63 corridor and as near to Hull as possible. Regeneration of run down areas of Hull must go ahead now.	Accessibility is a major component of the Sequential Approach and transport links will be analysed as part of it. The development strategy of the JSP fully supports the regeneration of Hull.	None.
154	Houses in Richard Cooper Street and Phoenix Street must not be demolished, but should be refurbished by a housing association.	This is not a matter for the Sequential Approach.	None.

Ref	Summary of response	Officer comments	Proposed changes to the Approach
Enid Thompson			
155	Is development land for housing still being provided in the East Riding to make-up for the shortfall at Hull?	Within the JSP, separate housing requirement figures are set out for the two local authorities (Hull City and East Riding). These were agreed at the regional level and allocated to local authority districts. The JSP clearly demonstrates a commitment to provide most residential development in Hull by the end of the Plan.	None.
156	Why should half of the calculated new houses required in the Western area be provided for at Goole? The town does not have any surfeit of post offices, bus routes, convenient walkways/cycleways, to approach the shops than a smaller community has. When there are proposals to demolish a local primary school, because numbers are falling, why are more houses needed?	The focus for development in the Western JSP sub-area should be in Goole as the Principal Town. Goole is well positioned as the Principal Town to accommodate growth and is the most sustainable location in the Western JSP sub-area with regards to infrastructure and facilities. Supporting local services is just one factor in determining the decision to build houses in an area. See also response to ref 39.	None.
157	Is it simply to supply the aspiring? In that case, it should be provided from existing stock, or elsewhere. Otherwise, the Port in Green Fields will be built over completely, by portside activities, industrial estate freight-centres and roofs of lo-cost (relatively speaking) private boxes for living where a vehicle is needed to get anywhere else.	Although development is proposed on Greenfield land, all the allocated sites are within the Development Limits of Goole. One of the objectives of the JSP is to create a focal point for housing, public transport, employment activities, shopping, cultural and community facilities for the JSP sub-area. By focussing activity in one place, it is hoped the need to travel by car is reduced.	None.
158	Why mention Snaith when a look at the plans shows there are no Greenfield sites for development?	The Housing Land Position Statement attempts to collate information on all sites available for housing (allocated and undeveloped or sites with planning permission). However, the Council makes provisions for windfall sites (sites unidentified as yet) and there may be circumstances where Greenfield windfall sites 'come forward' and are more sustainable than existing PDL sites. See also response to ref 33.	None.

Ref	Summary of response	Officer comments	Proposed changes to the Approach
159	The sites within Goole are all on low-lying land, and/or within close distance of the banks of the Ouse? What does the Environment Agency say to this extra building, with all its additional run-off?	The Environment Agency (EA) will be consulted as part of the analysis of all the sites. Significant investment has recently taken place in protecting the banks of the Ouse around Goole. The Council, together with the EA, needs to measure the potential impact of development before deciding which sites to release.	None.
160	Also at Goole, these sites are at the end of winding narrow streets, one way in and one way out, more or less. I refer to Hook Road and Pasture Road, as access to the warren of sites on both sides of the railway line that cuts the Greenfields into two. Traffic on both is single-line, and cycling is nigh impossible on them.	Access and constraint issues are built into the Sequential Approach (see paragraphs 3.16-3.19). There are particular Local Plan policies which also highlight a number of constraints/requirements with particular sites.	None.
161	Also the density figures for Goole are a target of 35, and one Brownfield site (Adelphi) has already been granted outline at 50, the very topmost figure for density, in a neighbourhood of red bricks. Actual 19c. density was quoted by ERYC at 48 in printed documentation (Housing 2004). So why are we in 21c. perpetuating the build-up of bricks at the highest density? Are we building more low quality for the future, to be pulled down in turn when the time is judged right for re-development again?	The development at the Adelphi warehouse is a very sustainable location and the density figure reflects this. Density is not a determinant of quality in its own right. There are many examples of successful high-density schemes incorporating good quality design to meet modern demands.	None.
162	As Howden has sites for 702 new houses at a lower density, why not build there at least half the figure ERYC says is required? After all, there is a big company offering up-market aspirational jobs and lifestyles there - PA. - whereas in Goole we have very low paid workers and some have no work at all.	Howden's role in the Western JSP sub-area is to complement the Principal Town. This is unlikely to be achieved through releasing more land for residential development here than in Goole. Residential development in Goole is intended to complement the development of the economy and employment land within Goole.	None.
163	Where is the affordable housing? Price of the most humble brick terrace in Goole is now more than the average salary can meet. On this I am submitting comments to a Government All Party Select Committee. It is not long since I was given information by planning that there was sufficient affordable housing in Goole to provide for all needs, so new developments did not need to provide any amongst the new plans to be submitted! My response to that is that it seems the Adelphi brownfield site is being over-developed (see density) simply to provide the built-up parts of Goole town with more of the same. Never mind the need for green space between streets.	The prevailing Supplementary Planning Guidance on affordable housing dates from 2001 when the need for such housing in Goole was not so significant. This SPG will be reviewed as part of the Housing DPD. This exercise is to release houses to meet the strategic housing requirement and will need to be carried out in a manner that does not prejudice the Advance Goole proposals.	None.

Ref	Summary of response	Officer comments	Proposed changes to the Approach
164	So why are plans to compulsory purchase and demolish small houses in Goole being pushed ahead when ERYC points out there is a need for greenfield development at Goole to supply requirements?	<p>The Advance Goole proposals will address the market weakness for certain types of housing by improving properties and the environment to increase the demand for those properties. This may involve the removal of some of the excess property by clearance.</p> <p>Greenfield sites need to be released in this area in order to meet the strategic housing requirement set out in the JSP, but the Council has controlled the scale of the release so that it minimises the risk to the Advance Goole proposals and it will endeavour to ensure that the new housing will not compound that market weakness.</p>	None.
Robert Hall, Gilberdyke			
165	I appreciate the need to refocus on the development areas, but would also like to urge the Council and Planning Officers to consider appropriate development in the surrounding villages, especially where there is a need to provide affordable housing for those wanting to remain in the area they grew up in., or who wish to live nearer their place of work to reduce travelling.	Policy DS4 has been designed to accommodate these types of need. The terms, 'limited development' and 'local needs' will be further defined in the Smaller Settlements DPD.	None.
Mrs M E Raper, North Newbald			
166	Land at West Hall Close, North Newbald should be considered for release [Plans attached].	The site is located in the Northern JSP sub-area which has not been identified as an area for Greenfield releases. This has been registered and acknowledged as a 'Land Bid'.	None.