

General and Chapter I – Introduction

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For responses to the SA/SEA question, please see the latest Sustainability Appraisal Report accompanying the Draft Strategy Document.

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Core Strategy - Further Consultation				
Mr Pete Sulley, Barton Willmore on behalf of The Kingswood Parks Development Company Ltd	CSFC/821	Observations	<p>1.0 INTRODUCTION</p> <p>1.1 These representations have been prepared by Barton Willmore on behalf of The Kingswood Parks Development Company Limited (KPDC), who has land interests within the East Riding at North Kingswood, which adjoins the existing Kingswood development in Hull.</p> <p>1.2 These representations are in relation to the ‘East Riding Local Development Framework – Core Strategy Further Consultation’ (October 2011) (hereafter referred to as the ‘Further Consultation’). The aim of this report is to assist the Council in formulating their Local Development Framework, having particular regard to the situation at North Kingswood and the continuation of the existing Kingswood development.</p> <p>1.3 The site is attached at Appendix I (see attached file) and is wholly owned and controlled by KPDC. The site is referred to in the Strategic Housing Land Availability Assessment (SHLAA); it also has further reference numbers allocated to submitted Land Bids. There is no</p>	<p>Comments noted. The Draft Strategy Document reflects the changes made to national policy and the National Planning Framework (NPPF).</p> <p>Policy S1 of the Draft Strategy Document is modelled on the approach taken in the NPPF.</p> <p>See also comments to specific responses made by the consultee elsewhere in the reports.</p>

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			<p>corresponding Site Allocations DPD reference. The site therefore has several reference numbers and these are set out below for completeness.</p> <p>Site: North Kingswood</p> <p>SHLAA ID Reference:-Hull2</p> <p>Site Allocations DPD Reference:-</p> <p>Land Bid and Reference: 1505 and 1605</p> <p>1.4 Barton Willmore has previously made representations on the 'Core Strategy – Issues and Options' document in June 2008, the 'Preferred Approach Core Strategy' in July 2010 and the 'Site Allocations Development Plan Document' in July 2010.</p> <p>1.5 As stated in paragraphs 1.3 – 1.6 of the Further Consultation, the responses that East Riding received in relation to the Preferred Approach Core Strategy identified the need to consider some important amendments to certain policies; these are contained in the Further Consultation. These representations are a response to those changes and questions addressed in the Further Consultation document.</p> <p>1.6 In summary, the representations refer to the following sections of the Further Consultation:</p> <ul style="list-style-type: none"> • Place Statements – Question 1: Whilst Kingswood is not a Major Haltemprice Settlement it performs a similar role and function as the Major Haltemprice Settlements. North Kingswood, being an extension to Kingswood, should 	

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			<p>therefore be treated in the same regard and with the same policy framework as an extension to one of the Major Haltemprice Settlements, recognising that it is a unique situation.</p> <p>1.7 Where Barton Willmore has made comments in previous Core Strategy consultation documents that have not resulted in subsequent revisions in this Further Consultation then our original representations still prevail, although they have largely not been repeated in this document for reasons of brevity.</p> <p>Draft National Planning Policy Framework</p> <p>1.8 Since the Preferred Approach Core Strategy consultation period between May and July 2010, the Government has published the Draft National Planning Policy Framework (NPPF). Once adopted, this will supersede all Planning Policy Statements and Planning Policy Guidance Notes.</p> <p>1.9 The Draft NPPF has a more positive approach to growth, with the Rt Hon Greg Clark MP, Minister for Planning, stating in his foreword that ‘...sustainable development is about positive growth – making economic, environmental and social progress for this and future generations’. This positive approach is continued throughout the whole draft document.</p> <p>1.10 The Draft NPPF also reintroduces the concept of ‘a presumption in favour of sustainable development’ as opposed to the maxim of recent years which has been ‘development in accordance with the development plan unless material considerations indicate otherwise’. Whilst</p>	

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			<p>these two strategies go hand in hand in terms of aiming to achieve sustainable development there is a clear shift in emphasis in the Draft NPPF to a more positive and proactive planning system.</p> <p>1.11 Advice issued by The Planning Inspectorate states that 'It is capable of being a material consideration, although the weight to be given to it will be a matter for the decision maker in each particular case'.</p> <p>1.12 Firstly, this therefore significantly strengthens the case for not only drafting positive Visions, objectives and policies but also for a positive interpretation of these Visions, objectives and policies. Consequently, the representations made in relation to the Preferred Approach Core Strategy in July 2010 carry extra resonance.</p> <p>1.13 Secondly, it is concerning that the Draft National Planning Policy Framework is not mentioned once in the Further Consultation document. In addition, there are no indications of the more positive emphasis on development contained in the Draft NPPF being taken forward into the Further Consultation. Therefore it is not evident that this important document has been considered appropriately in this Further Consultation.</p>	
Mrs Julie Hobson, Health & Safety Executive	CSFC/1	Object	<p>Dear Sirs</p> <p>LOCAL PLAN/LOCAL DEVELOPMENT FRAMEWORK:</p> <p>The Health and Safety Executive (HSE) does not comment on individual Local Development Plans.</p> <p>Local planning authorities are required by:</p>	Comments noted

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			<ul style="list-style-type: none"> • Regulation 20 of the Town and Country Planning (Development Plan) (England) Regulations 1999 * • Regulation 25 of the Town and Country Planning (Structure and Local Plans) (Scotland) Regulations 1983 * • Regulation 13 of the Town and Country Planning (Local Development Plan) (Wales) Regulations 2005* <p>* delete as applicable</p> <p>to have regard to the objectives of Article 12.1 of the Seveso II Directive in formulating their general policies in Part I of a unitary development plan.</p> <p>These objectives are:</p> <ul style="list-style-type: none"> • to prevent major accidents and limit the consequences of such accidents for man and the environment; • the need; <p>i. in the long term, to maintain appropriate distances between establishments and residential areas, areas of public use and areas of particular sensitivity or interest; and</p> <p>ii. in the case of existing establishments, for additional technical measures in accordance with Article 5 of the Directive so as not to increase the risks to people.</p> <p>The HSE extranet system, to which all planning authorities have access, contains lists of all major hazard sites and major hazard pipelines, along with consultation zone maps</p>	

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			<p>where available. This information, in conjunction with “PADHI - HSE’s Land Use Planning Methodology”, which is available on the HSE website (http://www.hse.gov.uk/landuseplanning/padhi.pdf), will allow you to identify incompatible developments within each consultation zone.</p> <p>If there are any major hazard sites and pipelines, or associated consultation zones, within the Local Development Plan area, it would be helpful to indicate to potential developers the constraints likely to be imposed by their presence. The paragraphs in the attached annex could form the basis of a policy statement for inclusion in the plan, which may subsequently avoid the submission of planning applications containing inappropriate proposals.</p> <p>In addition, we suggest that the proposal maps be marked to show the location of any major hazard sites. We particularly recommend marking the routes of any major hazard pipelines as, in our experience, most incidents involving damage to buried pipelines occur because third parties are not aware of their presence</p> <p>HSE will advise you should there be any changes in how HSE provides land use planning advice as a result of recommendations on the integration of societal risk into the planning system around major hazard sites made by the Major Incident Investigation Board into the fire and explosions at the Buncefield Oil Storage Depot, HSE’s proposals for revised policies to address societal risk around onshore non-nuclear major hazard installations, or other developments in the planning sphere.</p> <p>Yours faithfully</p>	

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			<p>MR N JAMES</p> <p>HM Principal Inspector of Health & Safety</p> <p>Annex</p> <p>Suggested general statement on major hazard sites</p> <p>Certain sites and pipelines are designated as major hazards by virtue of the quantities of hazardous substances present. The siting of such installations will be subject to planning controls, for example under The Planning (Hazardous Substances) (Amendment) (England) Regulations 2009 OR The Planning (Control of Major-Accident Hazards) (Scotland) Regulations 2009 OR The Planning (Hazardous Substances) (Amendment) (Wales) Regulations 2010 (delete as applicable)</p> <p>aimed at keeping these separated from housing and other land uses which might be incompatible from the safety viewpoint. In accordance with Department for Communities and Local Government Circular 04/00, the Local Authority will consult the Health and Safety Executive, as appropriate, about the siting of any major hazard installations.</p> <p>The area covered by this Local Development Plan already contains a number of major hazard sites and pipelines. Whilst they are subject to stringent controls under existing health and safety legislation, it is considered prudent to control the kinds of development permitted in the vicinity of these installations. For this reason the Planning Authority has been advised by the Health and</p>	

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			Safety Executive of consultation zones for each major hazard site and pipeline. In determining whether or not to grant planning permission for a proposed development within these consultation zones, the Planning Authority will consult the Health and Safety Executive about risks to the proposed development from the major hazards in accordance with Circular 04/00.	
Gemma Edwardson, Edwardson Associates on behalf of Mr T A Naylor	CSFC/40	Observations	[Supporting information for site DRF16 of the Allocations DPD - Potential Sites consultation]	Supporting information received. Individual sites will be considered through the Allocations Document.
Gemma Edwardson, Edwardson Associates on behalf of WM E Naylor,	CSFC/45	Observations	[Supporting information for site KIL7 of the Allocations DPD - Potential Sites consultation]	Supporting information received. Individual sites will be considered through the Allocations Document.
Gemma Edwardson, Edwardson Associates on behalf of WM E Naylor,	CSFC/47	Observations	[Supporting information for site DRF14 of the Allocations DPD - Potential Sites consultation]	Supporting information received. Individual sites will be considered through the Allocations Document.
Ms Barbara Partridge, United Residents of Bransholme Area North	CSFC/59	Other	Thanks for keeping us informed. It is much appreciated. If there are any further developments I hope you will keep us in mind.	Support noted.
Mrs Claire Boston, Bempton Parish Council	CSFC/63	Observations	To always look to the Parish Council where planning is concerned.	Comment noted.
J B & J Irwin,	CSFC/84	Object	After viewing plans at Hedon library, I am writing to advise that we have concerns regarding flood risk and more traffic along Chestnut Avenue Hedon in regards to land marked as Hedon 1 on your maps.	Comment noted.
Ms Nicola Salvidge, Seaton PC	CSFC/91	Observations	I feel as though I have been very negative about this paper. But I truly believe that you can not put places into groups you must look at the needs of each place. We know they will vary but the needs of some towns will not be the same as others. Towns on the coast rely on leisure and tourism	Comment noted.

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			<p>predominantly for their income and have increased populations during certain months increasing their needs, impacting on statistics used.</p> <p>Those such as Hedon will be looking at industrial ways for support. If you look at anything please look at actual population including those classed different because they live in caravans or similar you will see a different picture.</p>	
Mrs Joy Hodgson	CSFC/92	Observations	<p>Ref Consultation Goole Development Proposed sites Goole 004 and Goole 005</p> <p>I would like to make the following points in regard to the above proposed sites. If you wish to add my comments on to any website please do so.</p> <p>My garden is prone to flooding and I believe others in Hood Grove and Wells Grove are affected. The usual problem is the inefficient drains especially at high tide. It is getting difficult to obtain buildings and contents insurance for North Goole areas near the river, sometimes often only available with a heavy loading. How many families can afford such high premiums?</p> <p>The water table stays high for a long time after heavy rain. The clay soils dries out in dry periods and in those sites it might prove to be expensive to build adequate foundations for new housing, putting the price out of the reach of the usual Goole residents.</p> <p>The areas are high grade farmland. The area acts as a much needed "lungs" for Goole residents. This is a wildlife corridor for birds such as sparrow hawks and migratory birds, deer and various water creatures. A better use for part of these 2 sites would be to create a public nature</p>	Comments noted.

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			<p>reserve and park possible even an overflow area for water during very heavy rain.</p> <p>The noise of the motorway is quite loud where I live, so new houses in those areas would hear a much greater noise. It is fine when the double glazed windows are all closed but not so good in the early evening especially for families with children. My preference is for any development would be a private sheltered housing complex such as Hannover Court probably housing elderly people wouldn't be so troubled by the noise and thus freeing up their bigger private houses to be sold to young families at an affordable price.</p>	
Mr P Munn	CSFC/106	Support with conditions	I generally welcome your revised document, and you are to be congratulated in your efforts to remain abreast of the many changes which are taking place in national strategy. I particularly noted your introduction of "gross housing" and "net housing" measures. However, the Core Strategy could well focus less on what the Authority hopes to facilitate and more on what your Authority, and the community, can achieve together.	Support and comments noted.
Mr P Munn	CSFC/107	Observations	I note that the implications of the proposals in the recent Budget Report covering improvements to the A164 are not included in the Core Strategy (but will have a considerable effect upon it).	Comments noted.
Mr P Munn	CSFC/108	Observations	PPS 3 of June 2011 requires that housing policy delivers "a flexible, responsive supply of land - managed in a way that makes efficient and effective re-use of previously-developed land, where appropriate". This objective is inadequately addressed. It is unclear in this Statement whether gardens are 'previously-developed land' or not, and your current Draft Site Selection Policy confuses,	<p>Comments noted.</p> <p>A definition of 'previously developed land', as defined by government, can be found in Annex 2 of the National Planning Policy Framework (NPPF). The definition makes clear that</p>

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			<p>rather than helps. Since the objective of planning policy is to regulate land use in the interests of the community, an opportunity to highlight the role of the, Authority in helping communities formulate and implement their vision may be going begging. In connection with the re-use of land, much of Anlaby was planned and developed in the immediate post-war period. Orchard Park in Hull was developed during a similar period. The parallels between Orchard Park and Anlaby are of course not great, but the Hull CC estimate that a house demolished in Orchard Park could be replaced by 2.5 houses built to modern standards (Hull CC Core Strategy January 2011 para 5.2.4). This seems a 'more efficient and effective" use of land. By 2028 almost all houses in Anlaby will be more than 60 years old - many will be more than 100. Effective? Efficient? I just ask the question.</p> <p>Without wishing to open up a philosophical debate, it could be useful to revisit the concept of 'stewardship' of land, rather than 'ownership'. The thing about land is that they aren't making any more; therefore whatever time-limited use land is put to has to be efficient and effective. The success of this process is a measure of community, not individual, wealth. One of the guardians of community wealth is the LPA through its policies.</p>	<p>previously developed land excludes 'land in built -up areas such as private residential gardens'.</p>
<p>Miss Miranda Steadman, CB Richard Ellis on behalf of Client Unknown</p>	<p>CSFC/119</p>	<p>Object</p>	<p>Whilst we agree with the overall increase in employment land requirements to 235 hectares with an additional 200 hectares at Hedon Haven as a whole, we consider that the document should make it clear that this employment land won't just serve the East Riding but that it will serve a much wider market area and vice versa, as is confirmed by the 'single market' emphasis contained within the Humber LEP 'Proposal to Government'. We also object to the way in which the Core Strategy has been developed in isolation</p>	<p>The Council is fully committed to complying with the 'Duty to Cooperate' and has worked with neighbouring local authorities on cross boundary planning issues as part of the preparation of the Strategy Document. The relationship between the East Riding and neighbouring areas has been</p>

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			<p>from the other Humber LEP LPA's. The justification for this is as follows.</p> <p>Emphasis on spatial planning</p> <p>As you know the purpose of the Core Strategy is for the Local Planning Authority to set out the general strategic vision for how they propose to 'place shape' the District. As the opening paragraph in PPS12 points out, for years this was done by the LPA's them-selves but more recently this is much more likely to be done through partnerships with the public, private and voluntary sector and also with neighbouring authorities.</p> <p>This Partnership approach to economic growth in particular was reflected in the announcement on 28 October 2011 by the Government of the launch of Local Enterprise Zones involving the Humber Local Enterprise Partnership (LEP) which sees the four Humber Council's of Hull City Council, East Riding of Yorkshire Council, North Lincolnshire Council and North East Lincolnshire Council working together to change the way economic growth is driven.</p> <p>The 'Proposal to Government' prepared by the Humber LEP states that "businesses see the Humber as a single market and a single zone of opportunity. There are strong commercial links between the two banks and shared potential for growth, particularly in the emerging renewable energy sector and linked sectors of ports and logistics."</p> <p>Despite this, and the guidance set out in section 4 of PPS12, the Partnership approach is not reflected at all in</p>	<p>highlighted throughout the Strategy's preparation.</p>

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			<p>the Core Strategy. In fact, no where within the document is the term 'Local Enterprise Partnership' even used.</p> <p>In our opinion, the approach by the Council to prepare their Core Strategy in apparent isolation from the other three Council's within the Humber LEP is contrary to the guidance in PPS12 which at paragraph 4.16 states that LPA's should "explore and exploit opportunities for joint working on Core Strategies" and at paragraph 4.17 where PPS12 goes on to state that "many issues critical to spatial planning do not respect LPA boundaries. Housing markets and commuter catchments often cover large areas, which makes planning on individual district in isolation a difficult task, even where the RSS gives a strong steer",</p> <p>Paragraph 4.18 gives examples of how joint working on Core Strategies can be through the preparation of a single plan, the concurrent adoption of plans, joint working on evidence base and overall policy direction or through the preparation of individual Core Strategy to the same timetable.</p> <p>In this case it doesn't appear that any joint working on the Core Strategy has taken place at all. There is no analysis within the document of how the four LEP areas fit together to create a single market. We consider that a Joint Working approach such as this is absolutely fundamental to ensure the Core Strategy forms a 'spatial' planning document and reflects how the economy of the entire Humber LEP is set to change with the identification of Enterprise Zones comprising 375 hectares to support the development of the Humber Renewable Energy Super Cluster covering Green Port, Hull and 2,000 acre energy park at Killingholme and the 35 hectares at the former</p>	

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			<p>BAE Systems site at Brough.</p> <p>Conclusion</p> <p>At the present time the Core Strategy is not a 'spatial' planning document and as such we object to the document as a matter of principle.</p>	
Ms Clare Streater, The Coal Authority	CSFC/120	Observations	Having reviewed your document, I confirm that we have no specific comments to make on this document at this stage.	Comment noted.
Mr J Winterbottom	CSFC/135	Observations	At the end of the day the most reliable weapon for ascertaining development requirements is common sense., which is the major item which always is most notable for its absence when major planning schemes are mooted. If billions are available to spend on development then any isolated village can be successfully developed into a thriving new town, or even city. This is never going to be granted to the East Riding, therefore it is pure common sense to limit spending on new developments to those places already served by adequate infrastructure locally, unless specific outside funding (on infrastructure improvements in addition to development outlay) is guaranteed, and sustainability is realistic rather than merely theoretically possible.	Comment noted.
F Waslin	CSFC/163	Object	The outcome to this survey capable of turning the River Hull floodplains upon which the majority of East Riding houses are built into a permanently flooding wider deeper more often "New Orleans". Age 20's degree laden Planners from University cannot get it into their innocent skulls you cannot add more hard surfacing for ever to a length wide floodplain of housing estates which is increasingly below storm high tide levels which has a solid	<p>Comment noted.</p> <p>One of the key pieces of the 'evidence base' that has informed the preparation of the Strategy Document is the Strategic Flood Risk Assessment together with various information from the Environment</p>

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			<p>steel barrier lowered to block off its outfall flow, the Hull storm Barrier.</p> <p>Yesterday I spoke to the Yorkshire Water Plc engineer who said his responsibilities also covered Beverley, to prevent town flooding. He was trying to trace a sewerage leak out on Scarborough Pier, so he covers a big territory. He advised me that it was now not possible to prevent Beverley town storm flash flooding. Our progressively heavier rainfall, too much incremental hard surfacing plumbed into sewers has removed the original drainage built in conservative safety margins. Despite that, both central government and the ERYC Planning Department is intending an orgy of house building to worsen flooding, traffic pollution and traffic jams, overwhelm hospitals and local community Health Centres. Turn village greens and town streets into parking bays because no where else exists to park the extra traffic. Flash flood and fast flood the East Ridings town centre shopping areas and high density housing areas to satisfy the political need to transfer 'the poor' from the south east to the regions, our new houses currently take half the price of theirs. All that, the price paid back to being creating new council jobs to be taken up by those laid off by their public sector funding cutbacks.</p> <p>Middlesbrough (north side of the Tyne) years ago, Council and developers 'Core Strategy' caught housing fever just as we propose to do, years ago. The house building fever caused mass migration, turning charming northern Pennine villages and towns into dying communities with only the old aged left behind. The original close spaced rural village communities outside Middlesbrough Town just disappeared into housing estates extending beyond the</p>	<p>Agency, Yorkshire water and other relevant bodies in relation to flood risk. This identifies where the most susceptible areas are in respect to all sources of flooding (tidal, fluvial, surface water / rainfall, and groundwater). It is true that a large proportion of the East Riding is classified as 'high risk', however the presence of flood defences reduces the risk of tidal/fluvial flooding in the majority of the main towns and villages. The risk of surface water flooding is also widespread and the Infrastructure Study acknowledges that the drainage networks in a number of settlements require substantial investment/improvement. The Draft Strategy Document includes a policy that requires new development to incorporate sustainable drainage systems (SUDs) and manage surface water run-off so that it does not add to or overburden existing networks.</p>

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			<p>horizon which had no shops. One resident told me she was on a bus for four miles to reach a shop out in the suburbs.</p> <p>Luckily northwards upslope from Middlesbrough is not a floodplain below tidal river high tide height as the whole East Yorkshire floodplain is. Our councillors seem intent committing the scenic rural East Riding environment to the Middlesbrough experience to avoid council job losses while house building corporations are all lined up to being offering political parties millions if they will drop community protection planning legislation which prevent development if existing drainage floods prior reaching the sea or an open estuary. In the County of East Riding, the only high and dry flood free sustainable land is to the north and the west of Bridlington town and therefore Bridlington could become a city with estates of light manufacturing and internet based businesses. The alternative is vicinity Brough, land above 50 ft high water mark to drain direct into the Humber. All other locations storm flood Beverley and Hull via its floodplain, matters made worse by the need to stop up and dam the whole floodplains runoff only a few metres before it reaches tidal waters!</p>	
Mr R Andrew	CSFC/166	Object	<p>In my opinion this is a poor report because;</p> <p>(iv) There is too much JARGON and too little plain English.</p>	<p>Every effort is being made to make sure the document is clear and readable without compromising necessary details.</p> <p>A glossary has been added to the Draft Strategy Document.</p>
Mrs Judith Macklin, Cottingham Parish Council	CSFC/170	Observations	The Council is concerned at the lack of transport links between Castle Hill Hospital and the rest of the	Comments noted.

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			surrounding villages.	
Mrs Sheila Duke	CSFC/171	Other	<p>Sorry to bother you with this issue but I should think the protection of the environment will be part of the forward plan. I note today in our local press that the verges at Rudston, near Driff. have signs placed in the verges re: protection. We do have a great deal of life in what remains of our verges - could we have some signs please to stop drivers, particularly those from Pocklington School, (4x4's and all the buses) destroying them all together. These vehicles only have to meet a large tractor for the verge to be mashed on both sides. The speed at which some people travel at is quite frightening, and this is why some of the hedgerow has gone - just so they can do that. A ban on Heavy goods would also be nice. Our infra structure - pipelines etc. run in the verges. The verges are essential for water run-off. In order to protect wildlife some farmers should plant back hedgerow which they have ploughed up - they are also now ploughing up the verges as well. The Country Mile Project calls for residents to help look after sections of grass verge - well I have been trying to do this for the last 8 years only to see my work destroyed again and again. As soon as the verge is destroyed the Council come along and place tarmac where there was grass.</p> <p>A way now needs to be found to get the destructors to use the new roundabout instead of the gross rat run they have created in Canal Lane by turning into Canal from the A1079, (at a dangerous point) holding up traffic, instead of continuing for half mile to the new roundabout.</p>	This matter is beyond the scope of the Local Plan.
Cllr John Whittle	CSFC/172	Support	Thank you for the opportunity to respond to the Core Strategy Document. I feel that the amount of time expended on this project, and the amount of consultation	Support noted.

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			and other events is laudable. It is to be hoped that in the preparation of the next document, comments and observations from consultees will be taken on board as it was with the last one.	
Sarah Watson-Quirk, Highways Agency	CSFC/179	Observations	<p>The Agency has previously reviewed your core strategy and commented, highlighting our areas of concern. In summary the points we have made that are of relevance to this further consultation document are as follows:</p> <ul style="list-style-type: none"> •Outputs from our Network Analysis Tool (NAT) demonstrated that your development aspirations would have a `major cumulative impact on the SRN. We advised that where demand will exceed operational capacity, deliverable improvements would need to be identified which would include plans for minimising traffic generated by new developments through travel plans. •We have previously raised concern in relation to the policy to locate BI development within the Major Haltemprice settlements. •An expectation that the core strategy should identify a mechanism for facilitating a `ring-master' approach to procuring capacity improvements, where the cost of these is beyond the ability of a single developer. <p>Our comments on this document relate mainly to the section of the document on the scale and distribution of development and are as follows.</p>	Comments noted. The council has continued to work with the Highways Agency to resolve any outstanding issues and the Draft Strategy Document seeks to address many concerns.
Sarah Watson-Quirk, Highways Agency	CSFC/184	Other	We would be very interested in working with you as you develop your Site Allocations Development Plan document so that we can assess the impact of the allocations on the operation of the SRN and identify any areas that may	Comment noted.

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			require mitigation works as a result of the development proposals.	
Mr Tom Cook, ID Planning on behalf of Landmark Development Projects	CSFC/200	Observations	The creation of sustainable settlements, where housing, jobs and community facilities (such as local services) should be a primary aim of the Core Strategy document.	Comment noted.
Mr Tom Cook, ID Planning on behalf of Key Growing Limited	CSFC/202	Observations	The creation of sustainable settlements, where housing, jobs and community facilities (such as local services) should be a primary aim of the Core Strategy document.	Comment noted.
Mr Tom Cook, ID Planning on behalf of Landmark Development Projects	CSFC/242	Observations	<p>Whilst my client welcomes a number of elements within the Core Strategy Further Consultation document it is clear that this guiding document should ensure that it is able to applied as flexibly as possible.</p> <p>In essence this means that a number of policies need to be amended in order to provide the Authority and those working, investing and residing within the District with sufficient comfort that each case can be determined on its own merits where other, beneficial material planning considerations are present.</p>	Comment noted.
Mr Tom Cook, ID Planning on behalf of Key Growing Limited	CSFC/243	Observations	<p>Whilst my client welcomes a number of elements within the Core Strategy Further Consultation document it is clear that this guiding document should ensure that it is able to applied as flexibly as possible.</p> <p>In essence this means that a number of policies need to be amended in order to provide the Authority and those working, investing and residing within the District with sufficient comfort that each case can be determined on its own merits where other, beneficial material planning considerations are present.</p>	Comment noted.
Mr Tom Cook, ID Planning	CSFC/244	Other	I trust that this representation can be taken into account	Comment noted.

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on behalf of Landmark Development Projects			by the Local Planning Authority in their consideration of the Core Strategy, Further Consultation and I would be grateful if you could acknowledge receipt of this representation by written return.	
Mr Tom Cook, ID Planning on behalf of Key Growing Limited	CSFC/245	Other	I trust that this representation can be taken into account by the Local Planning Authority in their consideration of the Core Strategy, Further Consultation and I would be grateful if you could acknowledge receipt of this representation by written return.	Comment noted.
Mr Mike Simpson	CSFC/246 CSFC/247 CSFC/248	Observations	<p>The following notes are made on behalf of Middleton on the Wolds Parish Council.</p> <p>While we accept that the proposed number of new homes for the village is not unreasonable we have concerns about the existing utilities, infrastructure and services within the village and the lack of amenities required to service the new homes.</p> <p>In the strategy there is a medium to long term view to improve the sewerage in the village however adding further properties will create more surface water putting more strain on an already overloaded drainage system. There is no mention in the document that the Drainage system will be reviewed for Middleton on the Wolds the existing system is struggling to cope with the existing surface water and adding too many more properties before improving the existing drainage is going to result in significant flooding.</p> <p>The right type of housing should be used within the village to give younger people a chance to own properties in the village.</p>	<p>Comments noted</p> <p>Policies H1 & H2 of the Draft Strategy Document will ensure that a mix of housing will be provided in the village which includes affordable homes which could cater for young people in the village.</p> <p>Policy C1 of the Strategy Document ensures that developer contributions will be sought from new development in order to meet the need for new or improved infrastructure and facilities that it generates and to mitigate its impact on the wider environment and the community.</p>

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			There was also a concern that the amenities offer within the village should be kept in mind while investigating planning. There is a very limited bus service and currently no shop to support residents.	
Frances Sadler, City of York Council	CSFC/251	Observations	The Council is committed to working with East Riding of Yorkshire Council on cross boundary issues as we progress our Local Development Frameworks. We understand that joint working will be formalised through a Memorandum of Understanding or similar document in the future.	Comments noted. The Council is committed to working with its neighbouring local authorities as part of the preparation of the Local Plan.
Mrs Anna Hughes	CSFC/259	Object	<p>Development of Stamford Bridge (170 houses proposed)</p> <p>The development of Stamford Bridge is already lopsided with 90% of the urban/housing on the other side of the bridge. The 170 houses will be added to this as that is the East Riding section of the village. Ideally, a collaboration with York City council/Ryedale/North Yorkshire (?) could be reached for housing on the West side of the bridge, evening out the development and preventing the increase of the problems that already exist in the village.</p> <p>There is already immense pressure on the single track bridge through the village as commuters from the village and surrounding areas head into York/Leeds/A64. The village is often at a standstill, clogged with cars at rush hour. New houses are going to exacerbate this.</p> <p>There is no new employment in SB so all the new residents will be travelling with all the other commuters adding to the problems. The majority will be travelling West to York. If the houses were built the other side of the bridge then many problems would be solved but this won't happen.</p>	<p>Comments noted. The East Riding Council administrative boundary extends across the Derwent to include land on the western side of the river.</p> <p>Housing sites on the western side of the river have been submitted to the council and are being assessed in the Allocations Document.</p> <p>The close proximity of these sites to services in the centre of Stamford Bridge has been taken account of in the assessment.</p> <p>The council is committed to working with Ryedale Council on planning issues.</p>

Consultee/Agent	ID	Nature Of Response:	Response	Officer Comments
			<p>The village has already grown immensely with developments in 2000 and 2009 adding to the pressure on the roads and facilities. The current spread of the village means that the distance to the village amenities in the centre is too far for most and cars are being used to go to the shops etc. Parking is difficult and dangerous around the shops (see deaths in August in SB square) and more housing even further out will just add to the problem of residents using their cars. (Again, if the development was on the other side of the bridge, the distance to the shops would be small enough for residents to walk- solving these problems)</p> <p>The back roads into SB (Moor Lane/High Catton/Low Catton Road) are in a poor state; crumbling verges, potholes and have increased hugely in traffic (I know, my house backs onto one) in the last 3 years due to people using the back roads not the main A1079 or A166 as they are too busy. New housing is not going to ease this problem.</p> <p>Serious thought needs to be made on these developments and I hope these comments will help. Thank you.</p>	
J M Richardson, Hedon Town Council	CSFC/262	Observations	Hedon Town Council notes the consultation document and awaits further consultation. Any "new build" in Hedon adds to the existing flood risk and Hedon Town Council wishes to be assured that drainage and services infrastructure will support further development in the town."	Comments noted
Eastern Area Planning Sub-Committee	CSFC/263	Support	Resolved:.... 9b) that the Sub-committee welcomes the proposals relating to hinterland villages and the removal of local needs conditions as well as raising the need to to be	Support noted.

Consultee/Agent	ID	Nature Of Response:	Response	Officer Comments
			aware of local infrastructure requirements as part of any proposals.	
Mrs J. Moxon, Withernsea Parish Council	CSFC/264	Observations	<p>In response to the ER LDF Core Strategy Consultation, Withernsea Town Council would like the following comments to be taken into consideration.</p> <p>The Document largely ignores caravan parks. The significance of these in terms of impact on local infrastructure such as the doctors, hospital etc as well as the possible benefits is therefore ignored.</p> <p>Flooding - both coastal erosion and inadequate drainage may render some areas unusable.</p> <p>The current recession and drop in house prices is not encouraging house building. 17 years is a long time to predict in terms of economic growth, and government legislation.</p> <p>In Withernsea many of the people coming to live in the town are retired or approaching retirement. Is the housing envisaged appropriate for our needs?</p> <p>As the retail offer in Withernsea follows the coastline then any new expansion in the future to extend this offer will not be possible in a sensible location. It would therefore seem sensible to designate the whole of the area between Aldi's store and The Hut (adventure playground on Millennium Green) as RETAIL only.</p> <p>Withernsea is an area of high unemployment and really needs to attract people who have money to invest to come and live here. Withernsea has very few houses in Council Tax Band D and upwards. We therefore need to</p>	<p>Comments noted.</p> <p>The Draft Strategy Document takes in account current economic conditions on the rate of house building.</p> <p>Policy H1 of the Draft Strategy Document ensures new residential development provides a mix of housing reflecting identified housing need.</p> <p>Policy A5 of Draft Strategy Document looks specifically at the Holderness and Southern Coastal Sub Area including promoting employment development in Withernsea.</p>

Consultee/Agent	ID	Nature Of Response:	Response	Officer Comments
			<p>provide a desirable site for executive homes only. This should in no way detract from the other housing types proposed by the strategy.</p>	
Mr Peter Hemmerman	CSFC/287	Object	<p>Thank you for your information but I am afraid that after several hours of study of the document I will not be making any contribution to the consultation procedure.</p> <p>I have done my best to study the documents but I have to say that this is not designed or worded for the average layman to understand.</p> <p>I am however deeply concerned by the large number of comments which are from housing developers and appear to be driving the strategy.</p> <p>I would appreciate your confirmation of receipt of this email and acknowledgement of my concerns as I do not feel able or willing to enter any response to the consultation website as I do not believe my comments will be taken into consideration in view of the previously mentioned comments from financially interested developers.</p> <p>I do not believe this consultation process will take into account the wishes and concerns of the residents of Market Weighton either , I believe you are just going through the motions as required by law and that the outcome is already decided.</p>	<p>Comments noted.</p> <p>Every effort is being made to make sure the document is clear and readable without compromising necessary details.</p> <p>A glossary has been added to the Draft Strategy Document.</p> <p>Consultation has been an integral part of the preparation of the document and as such, the plan strategy and many of its policies have taken into account the views and concerns of the general public.</p>
Ms Margaret Baddeley, Nathaniel Lichfield & Partners Ltd on behalf of Bourne Leisure Ltd	CSFC/297	Observations	<p>Please find below representations on behalf of Bourne Leisure Ltd. in regard to the East Riding LDF Core Strategy Further Consultation document. Bourne Leisure operates the Far Grange Holiday Park near Skipsea, which is located within the East Coast Character Area 1a-</p>	Comments noted.

Consultee/Agent	ID	Nature Of Response:	Response	Officer Comments
			<p>Bridlington (tourism character area).</p> <p>Bourne Leisure has previously submitted representations on the Core Strategy Preferred Approach and the Planning for Tourism Accommodation Guidance Note for Developers, by letters dated 12 July 2010 and 17 March 2010 respectively, and these comments remain valid. Bourne Leisure considers that the Core Strategy should fully recognise the existing and potential importance of tourism to the economic growth of East Riding and that policy support should be given to the maintenance and enhancement of existing tourism accommodation.</p> <p>Bourne Leisure notes that this round of consultation is primarily in relation to settlement place statements, amendments to the Settlement Network and development in rural areas; the scale of housing and employment growth; and affordable housing and open space provision.</p>	
<p>Mark Lane, DPP on behalf of Mr Jonathan Atkinson, J G Hatcliffe and Partners</p>	<p>CSFC/303</p>	<p>Other</p>	<p>We write in respect of the above document which the Local Planning Authority ("the Council") is in the process of consulting upon. These comments are made on behalf of J.G Hatcliffe and Partners and relate, in the main, to residential development matters.</p> <p>The Core Strategy should seek a balanced approach to the growth of East Riding with appropriate amounts of development in sustainable locations. The main theme of the following policy response has this ultimate aim in mind. Our comments are made having reviewed all available information sources and where necessary include specific objections where we consider the text or policy to be unsound.</p> <p>For clarity we have set out below the questions we have</p>	<p>Comments noted.</p>

Consultee/Agent	ID	Nature Of Response:	Response	Officer Comments
			<p>responded to along with our comments on the Core Strategy.</p>	
Mr Harry Collier	CSFC/321	Observations	<p>On behalf of myself and my wife, I wish to respond to the letter of “further consultation” ER/1/5/7/SH/BQ dated 31st Oct 2011.</p> <p>May I apologise for not replying in the preferred way, i.e. interactive.</p> <p>I would also like to comment on the complexity of your correspondence, we feel it is a case of far too much “jargon”. It is definitely a case for “less” is more, and know this is far from only our opinion.</p> <p>We feel it would be far better to be more specific to problems in our post code instead of a “minefield” of information, which appears to be a standard letter. We do take on board your paragraph which related to the first draft of the core strategy, and you have made a “number of changes”.</p> <p>Earlier in this letter, I used the word specific, it seems it would be preferred if you could just advise of any changes towards the horsefield and allotments behind Ganton Way.</p> <p>To finish, I can only repeat what we felt initially, that is the land I have referred to is a jewel. I use this work to describe “PRECIOUS”, it is precious to the nature and plants contained therein, and the allotments provide a way of life for a lot of people.</p> <p>This “way of life” provides fellowship, association, food and healthy exercise. Please think how many lives directly and</p>	<p>Comments noted. Every effort is being made to make sure the document is clear and readable without compromising necessary details. A glossary has been added to the Draft Strategy Document.</p> <p>The future allocation of sites for development and protection will be dealt with through the Allocations Document.</p>

Consultee/Agent	ID	Nature Of Response:	Response	Officer Comments
			<p>in directly would be disrupted in one fell swoop.</p> <p>This type of lifestyle goes way back in British Social History. PLEASE leave this site available for these people, some of whom have probably "DUG FOR BRITAIN".</p>	
Mr John Taylor	CSFC/323	Object	<p>We have registered on your website. We have read your recent documentation which appears to us, as lay people-to be an object lesson in obfuscation. We also attended the "Consultation" at the Beverley Library. The displays were confusing,perhaps as a result of it taking place in a corridor already busy with other people not there for the " Consultation". Two members of the Council staff were present, one of whom admitted she knew nothing about the purpose of the consultation as she had been with the planning department only for a few days. There was only one map of the local development plan and no copies available to those attending. In fact the overriding conclusion of those attending and of those to whom we have since spoken was that this was not a consultation at all but a fait accompli.</p>	Comment noted.
Mr Bryan Davis, Elloughton-cum-Brough Town Council	CSFC/325	Support with conditions	<p>Following on from your 2010 consultation, we are pleased that many of our previous comments have been noted and incorporated into the current Core Strategy consultation. There are, however, several areas of serious concern which need comment.</p>	Comment noted.
John Downing, Rollits Solicitors on behalf of East Riding Securities Limited	CSFC/329	Observations	<p>Significant concern is recorded that the Consultation does not refer to the Government's Draft National Planning Policy Framework (NPPF). The Government's declared aim is that the legal status of the NPPF, once adopted, will to replace all Planning Policy Statements and Planning Policy Guidance Notes. This is a highly material factor and once adopted will alter the policy base against which the</p>	The Draft Strategy Document fully reflects the planning policy contained in the National Planning Policy Framework (NPPF).

Consultee/Agent	ID	Nature Of Response:	Response	Officer Comments
			<p>Core Strategy is to be judged.</p> <p>The Draft NPPF introduces a concept of 'a presumption in favour of sustainable development'. Not dissimilar presumptions were introduced in earlier years when development had stalled, most notably in the 1970's. Their purpose then was to kick start development. The same is true of the draft NPPF. The forward to the draft sets out the Government's vision in terms that "sustainable development is about positive growth - making economic, environmental and social progress for this and future generations".</p> <p>The Consultation already acknowledges that the sustainability of development in the Major Haltemprice Settlements is the best of anywhere in the East Riding, with ready and easy access to public transport jobs and a wide range of services without the need to rely on the motor car. The sustainability characteristics of the Major Haltemprice Settlements should be emphasised and employed in formulating a pro-growth policy framework for them.</p>	
Mr Bryan Davis, Elloughton-cum-Brough Town Council	CSFC/330	Observations	The major proposed growth area within Elloughton/Brough, is south of the Hull to Doncaster railway line is between the railway line and the Humber estuary. This area was, historically, flood plain and remains vulnerable from the Humber, but more importantly from water that flows from Elloughton, Welton and Brantingham Dales. We must insist that all concerns raised by the Environment Agency are taken into account before any decisions are made to allow development.	Comments noted
Mr Bryan Davis, Elloughton-cum-Brough Town Council	CSFC/332	Observations	The rapid expansion of Elloughton-cum-Brough over the past decade has resulted in major traffic and parking	Policy CI in the Draft Strategy Document ensures that developer

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			<p>problems across the area, but our real concern is the A63 interchange. Peak hour traffic congestion is severe and dangerous, with back-ups onto the A63 carriageways. This affects Elloughton, Brough, Welton, Melton, South Hunsley School and through traffic on the A63. Any consideration of further development in the wider Elloughton/Brough area must consider how traffic flows can be managed, if indeed they can. We reiterate that the only way to manage traffic flows to the southern parts of our area is to seek a means to connect to the "grade separated" junction at the Melton Business Park.</p> <p>Note also that if part, or all, of the BAE Systems site is given Enterprise Zone status and attracts new businesses, the traffic flows to/from the site are likely to increase, compared with that generated by BAE Systems.</p>	<p>contributions will be sought from new development in order to meet the need for new or improved infrastructure and facilities that it generates and to mitigate its impact on the wider environment and the community.</p>
Mr Bryan Davis, Elloughton-cum-Brough Town Council	CSFC/335	Observations	<p>Inherent in our comments is the issue of place definition. Not only does the built-up area cross over the boundaries of Elloughton-cum-Brough, Welton and Brantingham. Additionally whilst the built-up area is mainly in Dale Ward, it is partly in the Hunsley Ward. Further confusion will be created if the Boundary Commission's proposals for Parliamentary Constituencies are adopted as they could create a situation where the built-up area is served by different MPs. The Core Strategy consultation needs to look at boundary implications if it is to make any sense across the Elloughton/Brough built-up area.</p>	Comments noted.
Mr Bryan Davis, Elloughton-cum-Brough Town Council	CSFC/336	Other	<p>We trust that you will appreciate that our concerns are justified and constructive. We have avoided taking the "no more development" stance, as we see this as being unrealistic. However we must stress that our main reason for seeking compromise solutions, is that we consider that our community has suffered serious damage by</p>	Comments noted

Consultee/Agent	ID	Nature Of Response:	Response	Officer Comments
			<p>inappropriate development, over the last decade, and that the Core Strategy can be a means of addressing the shortfalls inherent in past schemes.</p> <p>We request that the ERYC continues to build on our Local Service Centre status and that it is recognises the strategic importance of Elloughton/Brough to the East Riding as a whole, far removed from its' former Haltemprice settlement status.</p>	
Mr Richard Gladwell	CSFC/346	Observations	<p>The recent announcements of financial support from the government for the A164 improvements and the South Beverley link are welcome and will help with the increasing traffic flow in and around Beverley. Significant increases in the population of Beverley will, however, require a significant degree of commuting from the town due to (a) the shrinkage of the public sector employment opportunities within Beverley in line with current government policies and (b) the preponderance of employment opportunities in Kingston on Hull (as exemplified by Figure 2.10 'Inter-district commuting flows, 2001'.</p> <p>Recent announcements of the very welcome development of Hull and Humberside and reduction in Humber Bridge tolls may reasonably be expected to increase employment opportunities in these regions and hence to increase further the commuting flows from Beverley towards Hull and Humberside developments. It is to be hoped that any additional substantial housing developments in or adjacent to Beverley will be planned to minimize the increased traffic flow in Beverley.</p>	<p>The minimisation of traffic flow is dealt with by policy EC5 of the Draft Strategy Document which supports new development where it is accessible by sustainable modes of transport and brings forward other necessary transport infrastructure.</p> <p>Development proposals which would act to diminish the role and function of the Strategic Transport Network (such as the A164) will only be supported where there are overriding social economic or environmental benefits.</p>
Professor Barbara English	CSFC/360	Observations	Beverley and District Civic Society	Comments received to the Beverley

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			<p>East Riding Local Development Framework</p> <p>Core Strategy Further Consultation October 2011</p> <p>The Further Consultation concentrates on two policies that were incomplete in the earlier consultation of 'last summer' (actually 2010). It does not appear from the 'Further Consultation' that ERYC are interested in comments on any other areas of the LDF (1.8) These two policies are:</p> <ul style="list-style-type: none"> • Place Statements • East Riding Settlement Network (aka new development) <p>The 2011 Place Statement for Beverley ('how it will look by 2028') is on p.11 of the further consultation document. It is identical to the 2010 statement.</p> <p>The earlier comments on the Place Statement by the Society were either overlooked or ignored?</p>	<p>Place Statement that was included in the Preferred Approach Core Strategy (May 2010) were taken into account and led to a number of minor amendments to the statement. The statement was re-published in the Core Strategy Further Consultation (October 2011) for completeness.</p>
Mr John Pitts	CSFC/365	Object	<p>The following comments are based on what I see happening in my own village of Holme On Spalding Moor but I suspect they could be applied to most areas of the East Riding.</p> <p>I have to say that over the past years I have become disappointed at how my village has evolved. This is ,as most are in the East Riding, a country village and it is fair to say that this has gone down hill due to all the approved infill along High Street and Selby Road. This has been greatly exacerbated by allowing the squeezing of too many on a plot or building large houses where smaller or</p>	<p>Comments noted. Car parking guidance is set in Draft Strategy Document Policy EC5 which states that parking spaces for new residential development should reflect, the level of public transport accessibility, the expected car usage on the site and the most efficient use of space available and good design.</p> <p>Policy C1 in the Draft Strategy Document ensures that developer</p>

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			<p>bungalows should have been built. Some sites have such small access roads that visitors park on the main road which shouldn't have to happen. Other sites have been agreed that have a poor egress - how did these get permission - these sites should have been told to find access from the rear. The most recent is to force the village to have affordable homes on a green field site against the wishes of 600 residents.</p> <p>What I am saying is I am not convinced our planning committees and planning department have done us a good job in the past and if the above continues therefore even less convinced as to how well they will deal with new housing applications in all our villages in the future.</p> <p>I thought new build areas had to have good transport links and local jobs, this should mean better bus links and perhaps before any building the council should expand their local industrial estate??. If nothing improves then the A1079 Hull-York road will have to be improved sooner than later to cope with all the extra traffic. In an ideal world it would be improved before all the extra building takes place but then all infrastructure ,school places, public transport etc should ALL be looked into and organised BEFORE any village is expanded but will it happen this way.</p> <p>Back to H.O.S.M. , please stop infilling, plan decent estate roads in advance, build a car park for the school, if new build is East of the A614 then too many people / cars / children would have to cross a very busy road. A roundabout or by-pass should be planned if this happens.</p> <p>In fact the route for a future by-pass should be planned now and kept clear of any future building.</p>	<p>contributions will be sought from new development in order to meet the need for new or improved infrastructure and facilities that it generates and to mitigate its impact on the wider environment and the community.</p>

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			<p>Please give more consideration to our villages and build appropriately which may mean sometimes asking builders to change their plans / layout / size etc..</p> <p>Thank you for letting me give my views.</p>	
Mrs Jennifer Gladwell	CSFC/379	Observations	<p>I acknowledge the hard work, aspirations and enterprise which has gone into the production of this enormous tome , however I found it hard work to assimilate.</p>	<p>Comment noted.</p> <p>Every effort is being made to make sure the document is clear and readable without compromising necessary details.</p> <p>A glossary has been added to the Draft Strategy Document.</p>
Mr Geoffrey Streets	CSFC/402	Observations	<p>Following recent discussions at a 'drop in' consultation, I enclose timetables no. 30 & 34 showing services at Hessle Station: you will see there are slightly more stops than the Hull & Brough TransPennine service frequency {timetables enclosed}.</p> <p>Until about 2 years ago, they were in a combined booklet which included TransPennine. I have not been able to find a reason for the decision, and the preamble in each booklet does not refer fully to additional services. There is no cross-reference (N.B. these tables expire 10th December).</p> <p>I suppose Mr Menzies would follow up this retrograde step in order to restore the convenience of one booklet for travellers.</p>	<p>Comments noted but this matter is beyond the scope of the Local Plan.</p>
Ms Rachel Douglas, Gladman	CSFC/414	Observations	<p>- The National Planning Policy Framework (NPPF)</p>	<p>The Draft Strategy Document fully</p>

Consultee/Agent	ID	Nature Of Response:	Response	Officer Comments
			<p>promotes growth through a proactive planning system that encourages and facilitates development.</p> <ul style="list-style-type: none"> - The Core Strategy should not arbitrarily constrain growth through restrictive policies and insufficient allocations that prevent the housing needs of the District being satisfied during the plan period. - The Core Strategy should be robust in meeting the ‘real’ housing need as identified by the Strategic Housing Market Assessment (SHMA) and should not have an arbitrarily reduced and therefore artificial housing target. - The Core Strategy should positively embrace development that meets the social, economic and environmental needs of the District. <p>Reasoned Justification</p> <p>It would seem that the Core Strategy has not taken into account the draft National Planning Policy Framework (NPPF). Although the document is in draft it will shortly be adopted replacing Planning Policy Statements and Guidance. We feel that the document is a material consideration in the preparation of the Core Strategy and should be duly considered.</p> <p>One of the key differences between the National Planning Policy Framework (NPPF) and current national planning policy is the emphasis on growth. The NPPF states:</p> <p>‘A positive planning system is essential because, without growth, a sustainable future cannot be achieved. Planning must operate to encourage growth and not act as an</p>	<p>reflects the policy contained in the National Planning Policy Framework (NPPF).</p>

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			impediment.' (Paragraph 13)	
Mrs C. Binnington, Driffeld Town Council	CSFC/437	Support	Very well presented - clear and concise and we understood it! Well done and thank you.	Support noted and welcomed.
Paul and Lesley Hawkins	CSFC/452	Object	<p>From the meeting we attended we understand the following are suggested:</p> <p>The number of houses planned for Beverley is 3,188. The existing houses in Beverley are currently approximately 14,000. We had to ask specifically for this information and the person had to look up the figures from a couple of different sources. If these</p> <p>numbers are correct then this means Beverley will increase in size by 22.8%.</p> <p>If this is true – then ERYC should be very clearly and simply explaining this to the residents. It is not right that the scale of the proposals HAS NOT BEEN VERY CLEARLY communicated to the public. Whilst at the consultation in Beverley we also made the following points, and heard other people commenting on the openness of the “public consultations”.</p> <p>a) The plans / information was very low-key. It would have been very easy to miss the consultation “table” – that is all it was 1 table with limited information available. There were no online access points, nor was there a full copy of any of the documentation that the public could take away. No models showing the extent of the proposals, especially for those who find it very difficult to read maps or plans or who find it difficult to understand figures and data tables.</p>	<p>Comments noted.</p> <p>Policy S5 of the Draft Strategy Document provides a framework for ensuring the Local Plan delivers sufficient housing the right places.</p> <p>Consultation has been an integral part of the preparation of the document. Every effort has been made to ensure the plan strategy and many of its policies take into account the views and concerns of the general public.</p>

Consultee/Agent	ID	Nature Of Response:	Response	Officer Comments
			<p>b) The publicity of the consultation has been very low-key. We had totally missed the very first consultation about the possible planned development areas. The council should VERY CLEARLY (again) publicise this – we get direct mailing (i.e. a letter thorough the door) about the changes to our waste disposal, but the information about this consultation has been within (and</p> <p>NOT front page) the ERYC newsletter and/or the local paper (we were told this as we do not have the time to read all of the ERYC or local free newspapers.) The priorities seem mixed up – this core strategy is of vital importance to all within the county – yet it has not been clearly communicated. This was not just our opinion – other people there were complaining about the lack of clarity and information available. It was not until the evening when the young man representing the council told other attendees that the public were entitled to ring the council and have someone explain the strategy / consultation to them. They had friends and neighbours that do not have computers, nor the ability to access the county hall customer services department to see these plans.</p> <p>c) Access for people working full time – it was only just possible to get to the consultation by leaving work early – I work in the centre of Hull and the consultation was finishing at around 6.30 or 7pm. I often am not able to leave work until around 6pm – and had to leave work early on this day to be able to attend. I am sure that some people would not be able to do this.</p> <p>d) It is not apparent if there is any suggestion to build /</p>	

Consultee/Agent	ID	Nature Of Response:	Response	Officer Comments
			<p>develop a “new” settlement on low grade agricultural land, clear of any flood risk area, but also close to public transport infrastructure. Many of the “towns” that it is apparent will need to increase in size have already been developed out of recognition over the last 15 years. The rate of development cannot continue, and is not sustainable, or the very reason that they are desirable towns will be taken away!</p>	
<p>Mr Malcolm Shute, Malcolm N Shute on behalf of Mr & Mrs A W Kay</p>	<p>CSFC/461</p>	<p>Other</p>	<p>Thank you for your invitation to comment on the Core Strategy Further Consultation Document, which forms a part of the emerging Local Development Framework (LDF) and supports the bid already made on behalf of xxxxx for inclusion of land at Eastington (site ETR6) for residential development under the Site Allocations DPD.</p> <p>The owners Mr & Mrs xxxxxxof xxxxxx(name and address deleted) would confirm that they would reiterate their intention that their site continues to be included in the LDF process as an allocation for residential development. The site is, and remains available and deliverable. It has no known service or access constraints to its availability and does we consider offer a sound choice to be prioritised in the site selection criteria for the settlement consistent with its identification as Secondary Rural Service Centre.</p>	<p>Comments noted.</p> <p>Individual sites are considered through the Allocations Document.</p>
<p>Mr Steven Roberts, Drivers Jonas Deloitte on behalf of Goole College</p>	<p>CSFC/473</p>	<p>Object</p>	<p>3.1 The College has read with interest the consultation draft but is concerned that there is no mention of the College in any part of this document, which we believe is a substantive oversight.</p> <p>3.2 The College plays a vital role in the local economy and will be a key stakeholder in meeting the economic growth ambitions of the District. The College continues to</p>	<p>Comments noted. The Draft Strategy Document seeks to retain a strategic overview and does not seek to go into specific detail over the development of individual institutions.</p>

Consultee/Agent	ID	Nature Of Response:	Response	Officer Comments
			<p>provide an educated workforce to the regional economy, particularly in respect of growing the skills available in the District and by virtue, the economy.</p> <p>3.3 Given the importance of education in realising economic growth, and by extension, housing growth, we believe that the Core Strategy should contain a strategic policy which supports the College in it's future operational activities.</p> <p>3.4 We therefore, respectively suggest that a suitably worded policy which supports the College and its future growth ambitions is included within the Core Strategy. Example text may read:</p> <p>“Provision will be made for the College to consolidate and expand their teaching operations within and adjacent to their existing campus in Goole, as their operational demands change over the lifetime of the plan”</p>	
Mr Steven Roberts, Drivers Jonas Deloitte on behalf of Goole College	CSFC/497	Observations	<p>4.1 The Hull College Group wishes to thank East Riding of Yorkshire Council for the opportunity to engage in the draft Core Strategy Further Consultation Paper.</p> <p>4.2 The College has a key role to play in achieving the sustainable economic growth ambitions of the Council. Goole enjoys the immediate economic benefits a student population brings to the local economy, as well as delivering the strategic knowledge base needed to build a strong and diverse economy based on knowledge capital and entrepreneurial activity.</p> <p>4.3 In order to continue to implement its emerging Estates Strategy, the College needs the support of a flexible planning framework which will allow the College to meet</p>	Comments noted. Individual sites are considered through the Allocations Document.

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			<p>its needs throughout the lifetime of the plan. A strategic policy within the Core Strategy which supports the College in this regard should be encouraged.</p> <p>4.4 Such a policy will form the foundation for a suitable mixed-use allocation for the College's estate in East Riding to include education, residential, employment and retail uses in the ensuing site allocations DPD.</p> <p>4.5 The College wishes to work together with the Council and other key stakeholders to ensure its emerging Estates Strategy can be implemented for the benefit of its staff and students, as well as the wider district as a whole.</p>	
Mr Steve Young, Holme on Spalding Moor Parish Council	CSFC/500	Object	<p>1. The consultation documents are very large, long and very difficult to read for volunteer Parish Councillors who do not have time to spend hours reading such documents, the recommendation is that documents are made simpler to read so that comments can be meaningful</p>	<p>Every effort is being made to make sure the document is clear and readable without compromising necessary details.</p> <p>A summary document of the Further Consultation was made available at the time and a glossary has been added to the Draft Strategy Document.</p>
Mr James Timm, East Riding of Yorkshire Council	CSFC/530	Support	<p>I confirm Asset Strategy support for the Core Strategy.</p> <p>The concept of focussing development to a limited number of settlements is consistent the Asset Management Strategy which focuses resources to ensure efficient use of capital and sustainable revenue costs going forward with resources focussed on those centres which can provide focal points for service delivery with access to a critical mass of population, sustaining key market towns and the</p>	Support and comments noted.

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			rural character of the East Riding by delivering frontline services from the key market towns and other main settlements, in accessible locations throughout the East Riding. Part of the strategy includes extending the Multi Purpose Centres models completed in Brough, Market Weighton and Pocklington throughout the East Riding's main settlements where possible, which could include Withernea, Hessle, Driffield, Beverley, Cottingham, Haltemprice, Horses,. Hedon and Bridlington.	
Lyndsey Fielding, South Cave Parish Council	CSFC/531	Observations	1) It would have been useful to attribute the general comments under "What you told us" as to whether they were made by developer, or the community.	Consultation with communities as well as businesses and other stakeholders has been taken into account of at every stage of preparing the document. As such the plan strategy and many of its polices have been changed to take account as far as possible the views of the general public.
R J Kingdom, South Cave Active Residents	CSFC/555	Observations	1) It would have been useful to attribute the general comments under "What you told us" as to whether they were made by developer, or the community.	Consultation with communities as well as businesses and other stakeholders has been taken into account of at every stage of preparing the document. As such the plan strategy and many of its polices have been changed to take account as far as possible the views of the general public.
Mr Chris R Butt, The Planning Bureau Ltd on	CSFC/568	Observations	Thank you for the opportunity to comment on the consultation for the aforementioned document. As the	Comments noted.

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<p>behalf of McCarthy & Stone Retirement Lifestyles Limited</p>			<p>market leader in the provision of sheltered housing for sale to the elderly, McCarthy and Stone Retirement Lifestyles Ltd considers that with its extensive experience in providing developments of this nature, it is well placed to provide informed comments on your Core Strategy insofar as it affects or relates to housing for the elderly. In regards to your Core Strategy, it is felt that the needs of an ageing population have been overlooked and omitted, for the reasons below.</p> <p>Reviewing your recent policy document, the East Riding of Yorkshire is shown to have a substantial elderly population, and this is predicted to grow. Indeed, the 'East Riding of Yorkshire - Positive about Life: Strategy for older people (2010-2015)' quotes the Office of National Statistics (ONS) mid year, which 'estimates for 2008, the East Riding has a larger than average number of residents aged 60 and above. 24% of the population is of pensionable age. The 80+ population of the East Riding has grown by 2.31%, which is a higher rate of growth than for the East Riding population as a whole or for the 80+ population in England and Wales (1.47%). Life expectancy for females is 81.9 similar to the England average however life expectancy for males is 78.6, higher than the England average of 77.7 (Department of Health, 2009)'.</p> <p>Specifically in regards to housing, the 'Housing Needs and Market Assessment' (2007) highlights the necessity for elderly accommodation, stressing a current shortage of one and two bedroom older persons dwellings, that if addressed could help to free up more substantial properties for larger households and families. The Assessment showed that around 15% of elderly people would consider moving to sheltered accommodation. This</p>	<p>Policy H1 of the Draft Strategy Document will ensure a variety of house types are provided throughout the East Riding to meet the need and demand as identified in the latest Strategic Housing Market Assessment and other evidence. The supporting text to this policy considers specialist accommodation including sheltered housing/retirement housing.</p>

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			<p>proposal will help address this identified local need.</p> <p>Finally, McCarthy and Stone are satisfied that the report stipulates that 'most new residential developments will create additional demand for open space. However, the additional demand for individual open space types will vary on more specialist residential uses, for example housing for older people will not create additional demand for open space for children and young people (p60)'.</p> <p>In summary, taking your own evidence into account, it is important to address the current and future need for specific housing for the elderly within East Riding of Yorkshire Borough; therefore McCarthy and Stone believe there should be a policy to encourage this type of development within your Core Strategy. E.g. please see the conclusion for suggestions in this regard.</p> <p>The remainder of the letter below provides an overview of private sheltered schemes and the benefits they can provide for the elderly. In addition, examples and suggestions are given of how policy can support and encourage the development of this much needed type of elderly accommodation.</p> <p>Community Benefits of Private Sheltered Accommodation</p> <p>"Housing Markets and Independence in Old Age - Expanding the Opportunities", of a new report by Professor Michael Ball of the University of Reading, was presented at a House Commons launch event in May 2011. This report highlights how owner-occupied retirement housing (OORH), such as that built by McCarthy & Stone Retirement Lifestyles Ltd, helps to address the challenges</p>	

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			<p>of housing an ageing population.</p> <p>Professor Michael Ball highlights how OORH provides numerous benefits to communities including increasing the availability of much needed family houses in areas of shortage. This is because most OORH residents will have freed up family homes they were previously under-occupying, the majority of which are located in the market area local to the Retirement housing development. It is therefore clear that private specialised housing for the elderly has a key role to play in providing a suitable and sustainable housing mix that meets the East Riding of Yorkshire Borough wider housing needs.</p> <p>Furthermore, the presence of specialised housing for the elderly often greatly enhances the sustainability of businesses in nearby town and local centres. A report compiled by 'The Opinion Research Business' (ORB) entitled A Better Life: Private Sheltered Housing and Independent Living for Older People shows how Retirement Living accommodation helps to underpin local shops services and facilities. The report found that 62% of residents in retirement living schemes preferred to shop locally, with 45% of resident shopping within one mile of their scheme.</p> <p>Benefits of Private Sheltered Accommodation for Elderly Individuals</p> <p>Sheltered housing is a proven housing choice for elderly people who wish to move into accommodation that provides comfort, security and the ability to manage independently to a greater extent. It enables older people to remain living independently within the community and</p>	

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			<p>out of institutions, whilst enjoying peace of mind and receiving the support that they need.</p> <p>All McCarthy & Stone developments are specifically designed to provide housing accommodation for elderly people, who have experienced specific life changing circumstances that prompt the move into a specialised, purpose built, living environment. The communal facilities and specific features within the apartments designed to meet the particular needs of these likeminded people, generally result in a much improved quality of life.</p> <p>The peace of mind and contentment that this form of housing brings to its residents should not be underestimated. The maintenance of an organised, stress-free lifestyle that will benefit the general health and well-being of a like-minded group of people within a contained, communal living environment is of paramount importance to the success of this form of housing, and a desirable end-result for society at large.</p> <p>Additionally, McCarthy and Stone also provide (Assisted Living) Extra Care Housing aimed at enabling independent living for the "frail elderly", persons typically aged 80 and over. The provision of suitable accommodation for the frail elderly will be of critical importance to the East Riding of Yorkshire Borough, and the UK on the whole, as the Office of National Statistics projects this age group will see the fastest rate of population growth.</p> <p>The Extra Care concept provides day to day care in the form of assistance and domiciliary care tailored to owners' individual needs, enabling the frail elderly to buy in care packages to suit their needs as they change. It provides</p>	

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			<p>further choice for the frail elderly allowing them to stay in their own home and maintain a better sense of independence, enhancing their personal welfare over time rather than through the fixed costs of a nursing or residential care with its one for all approach. Accordingly, Extra Care accommodation possesses a number of 'enhanced facilities' in terms of the communal facilities available and provides a higher level of care when compared to private retirement housing. It is therefore a different form of specialised housing for the elderly than retirement housing and provides the increasingly elderly population with more choice and with an alternative type of accommodation to meet their needs as frailty increases.</p> <p>Planning for Growth</p> <p>It is also necessary to consider the Written Ministerial Statement: Planning for Growth (23 March 2011) by The Minister of State for Decentralisation (Mr. Greg Clark) which states that "The Government's top priority in reforming the planning system is to promote sustainable economic growth and jobs. Government's clear expectation is that the answer to development and growth should wherever possible be 'yes', except where this would compromise the key sustainable development principles set out in national planning policy." It goes on to stipulate that "when deciding whether to grant planning permission, local planning authorities should support enterprise and facilitate housing, economic and other forms of sustainable development. Where relevant - and consistent with their statutory obligations - they should therefore, inter alia,</p> <ul style="list-style-type: none"> • consider fully the importance of national planning policies 	

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			<p>aimed at fostering economic growth and employment, given the need to ensure a return to robust growth after the recent recession;</p> <ul style="list-style-type: none"> • take into account the need to maintain a flexible and responsive supply of land for key sectors, including housing; • consider the range of likely economic, environmental and social benefits of proposals; including long term or indirect benefits such as increased consumer choice, more viable communities and more robust local economies (which may, where relevant, include matters such as job creation and business productivity); • ensure that they do not impose unnecessary burdens on development" <p>The Ministerial Statement carries a presumption in favour of development, except where this would compromise the key sustainable development principles set out in national planning policy. Furthermore, the Secretary of State for Communities and Local Government has made it clear that he will take the principles in this statement into account when determining applications that come before him for decision. In particular he will attach significant weight to the need to secure economic growth and employment. It is therefore considered that much needed housing for the elderly should be encouraged, and that viability is not compromised by an inflexible approach to site development criteria and planning contributions.</p> <p>Conclusion</p>	

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			<p>The provision of owner-occupied specialised housing for the elderly will widen the housing choices for older persons within the East Riding of Yorkshire Borough. It allows the local elderly to move into accommodation that enables them to remain living independently within the community and out of institutions, and therefore continue to contribute to the community, whilst enjoying peace of mind and receiving the support that they need.</p> <p>In light of the multiple benefits that owner occupied private sheltered housing for the elderly provides, both to residents and the wider community, and the increasing 'need' for this type of specialist accommodation for the elderly within District, it is suggested that the following policy be introduced that positively supports the delivery of specialised accommodation for older people including sheltered housing:</p> <p>"Development proposals for accommodation designed specifically for the elderly will be encouraged provided that they are accessible by public transport or a reasonable walking distance to community facilities such as shops, medical services, places of worship and public open space."</p> <p>Furthermore an additional method of encouraging the provision of specialist housing for the elderly could be in the form of a development incentive. The recent Professor Michael Ball report suggests that private sheltered housing for the elderly could be given an enhanced planning status, similar to affordable housing, to encourage sufficient levels of delivery from the private sector to meet existing and future demand stating that:</p> <p>'to improve the supply and lower the price of owner</p>	

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			<p>occupied retirement housing (OORH), this type of housing should be redefined as the equivalent of affordable housing in terms of negotiations with builders over development charges. Treating all OORH as a form of affordable housing in planning terms, because of its significant personal and community benefits, would help reduce prices and increase availability. However, to impose price or quality caps on part or all of it would damage supply. Rather this proposal suggests that all OORH new build should be given enhanced planning status alongside low-cost home ownership for younger households, which is already treated as a form of affordable housing' (emphasis added).</p> <p>In summary, McCarthy and Stone stress the need to consider addressing the current and future housing needs of older people within your Local Authority, and for your Core Strategy to acknowledge the role that owner-occupied sheltered housing schemes play in meeting older person housing needs and in providing housing choice for the wider community by freeing up valuable, under-occupied family homes in the local area.</p>	
R J Kingdom, South Cave Active Residents	CSFC/633	Object	<p>We are very disappointed in the amendments offered. Most of the comments we made in conjunction with the Parish Council have been ignored out of hand. It would appear to us that the East Riding, despite national guidance, seem to be obsessed with continuing the failed policies of previous plans using a dispersed settlement strategy. This approach was demonstrated in the JSP when this Council ignored the inspectors recommendations regarding DS4 settlements and is clearly replicated here. As currently written the detailed policies. regarding Secondary Rural Service Centres conflict with the stated vision and aims of the plan and are as such unsound. We have not had time</p>	<p>Comments noted. Previous comments have been acknowledged and taken into account. Changes have been made where sound planning reasons have been offered. It is not thought that the policies within the Strategy conflict with the overall aims and objectives of the plan.</p>

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			to look at the Supplement but don't to see any improvement there.	
Mr & Mrs Jackson	CSFC/634	Observations	<p>I rang on Tue 13th Dec about the LDF for "Leven" and was told that we should have received a letter about 6wks ago, I don't know why any correspondence should go astray, as our address was on the forms handed in to you on 26-7-2010 at the "customer care centre". However Angela Cowen has sent a plan of "Leven" of submitted bids, this only came on Sat 17-12-2011, so have had to reply straight away to hand in on Mon 19-12-2011 just to make sure our 4 acres has been submitted by us. It is next to the houses that was built down the "Orchard" by "Scrutons" they left a roadway leading to our 4 acres. Number LEV15 land east of the "orchard" on you map. This 4 acres has become a White Elephant to us since all the houses were built next door right up to the fence in between us, some of the bushes was even pulled out, this made it unsafe to keep any animals there anymore.</p>	Comment noted. Individual sites are considered through the Allocations Document.
Philip Neaves, CB Richard Ellis on behalf of Dart Energy (Europe) Ltd	CSFC/650	Observations	<p>CB Richard Ellis is instructed by Dart Energy (Europe) Ltd to submit a response to the Core Strategy further consultation. Dart Energy's interest lies with the utilisation of natural energy resources via the promotion of unconventional gas as a source of local, regional and national energy. This representation follows the submissions made by Composite Energy to the Hull and East Riding of Yorkshire Joint Minerals Plan in July 2010 and to the East Riding Core Strategy in July 2010.</p> <p>Dart Energy Ltd acquired Composite Energy in February 2011 and re-branded that company Dart Energy (Europe) Ltd in June 2011.</p>	Comments noted. The Draft Strategy Document no longer contains a policy on minerals. These issues will be considered through the development of the Joint Mineral Local Plan.

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			<p>Dart Energy (Europe) Ltd is based in Stirling and licensed to extract hydrocarbons under Petroleum, Exploration & Development Licence (PEDL). Dart Energy's Licence and development partner is BG Group and together submitted applications to the Department of Energy and Climate Change [DECC] for the 13th Onshore Oil & Gas Licensing Round to be awarded Petroleum, Exploration & Development Licences in England, Wales and Scotland, including PEDLS 174, 176, 178 and 179 within your authority's area.</p> <p>Dart Energy believes that there is a strong case to safeguard this nationally important resource. This submission seeks to ensure that the PEDL area is safeguarded as part of the minerals safeguarding and that a policy is included to deal with the contribution unconventional oil and gas can make to energy supply.</p> <p>Enclosed with this representation is a plan showing the PEDL areas.</p> <p>The Government's energy policy seeks to encourage the extraction of unconventional gas as part of a strategy for cleaner coal technology. This can be from coal bed methane (CBM) from deep coal seams or shale gas from deep shale reservoirs.</p> <p>Unconventional gas is important to the UK because it is a potential long-term source of indigenous natural gas. These untapped energy resources have the potential to alleviate the UK's need for a secure and diverse energy supply – an energy resource that would go untapped without CBM and shale gas extraction activities. Composite Energy can draw upon the areas of expertise that have been developed in</p>	

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			<p>existing Licences in its efforts to develop these resources.</p> <p>There are areas of the East Riding Council area that are underlain by significant deep coal and shale reserves, which have the potential for unconventional gas exploration and development. There is therefore a need for the Minerals Policy to recognise the importance of these potential energy resources and ensure that it accords with the aims and objectives of national energy policy.</p> <p>CBM and shale gas development provides an opportunity to extract a nationally important natural energy resource without the environmental impact normally associated with coal extraction. CBM and shale gas are clean coal technologies. CBM offers an extraction process that has a method of removing the methane from the coal without detrimentally affecting the physical properties of the coal. This facilitates the extraction of gas from coal seams in areas where the coal would be unlikely to be worked by traditional mining methods.</p> <p>Shale gas reservoirs are typically found at depths of between 900m and 3700m and again without the impact associated with coal extraction.</p> <p>The CBM and shale gas retrieval process and on-site operations are tightly regulated by DECC, the Coal Authority, the Health and Safety Executive and the Local Authority.</p> <p>Because of the need to have connectivity in the infrastructure necessary to deliver the efficient extraction of this energy resource such as utilities and pipelines, Authorities need to act in concert with regard to the</p>	

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			<p>respective policies for on-shore gas extraction in their emerging Development Plans. There is a need for all of the Core Strategy DPD to act in cohesion on this area wide issue.</p> <p>In addition to CBM and shale gas, the Development Plans should also address the full range of onshore oil and gas extraction including:</p> <ul style="list-style-type: none"> - Conventional onshore oil and gas development. - Extraction of petroleum or hydro carbon oils and gases by drilling and pumping. - Capture of methane that has accumulated in mine reserves. <p>CBM and shale gas exploration and development is incremental in nature. The coring of target coal seams and shale reservoirs enables the analysis of the gas content and identifies if sufficient gas is present to warrant investing in a Pilot Production Test.</p> <p>With CBM, testing the ability of a coal seam to produce commercial volumes of gas cannot be achieved with the use of one borehole. Typically a number of boreholes will be drilled across a known isolated slab of coal within a Licence Area. These wells will then be pumped as a collective, the intention to have a uniform drainage effect on the coal. Commercial production will be determined by the volume of gas being produced when the volume of water that is being produced has reached a plateau. If the initial Pilot Test is successful then additional wells are added to the initial appraisal cluster in order to scale up</p>	

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			<p>the production</p> <p>and commerciality of an area. Each well bore is expected to have a useful production life of up to 20 years.</p> <p>Shale gas also requires a number of boreholes across the Licence area. These boreholes will be tested and, if commercial production is determined to be achievable, additional wells may be added to the initial cluster. Each shale wellbore is expected to have a useful production life of up to 20 years.</p> <p>Support within the emerging Minerals Plan and any future Minerals and Waste Development Plan Document is therefore essential to enable long term CBM and shale gas development strategy to realise these nationally valuable resources.</p> <p>Basis of Representation</p> <p>The UK Government's energy policies seek to encourage the use of natural resources indigenous to the UK as part of achieving self sufficiency in energy production and increasing security of energy and gas supplies.</p> <p>Within the Command Paper The Energy Challenge the UK Government welcomes proposals to increase the flexibility in the UK gas market through sustainable practices but without being too prescriptive.</p> <p>Support for CBM as a natural energy source is set within Annex 4 of Minerals Policy Statement I: Planning and Minerals (MPSI) 2006. The Government expects offshore oil and gas to decline in coming years and aims to:</p>	

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			<p>- Maximise the potential of the UK's conventional oil and gas reserves in an environmentally acceptable manner;</p> <p>- Encourage the development of clean coal technologies; and</p> <p>- Encourage the capture of methane from coal mines where environmentally acceptable. (paragraph 2.2)</p> <p>CBM is a clean coal technology that can contribute to the aims of the MPS and secure energy from an untapped natural resource.</p> <p>Paragraph 3.21 states:-</p> <p>MPAs should identify in their LDDs the extent of the coalfield with reserves at depths below the surface of between 200-1500m and of areas which are licensed for CBM by the Coal Authority. The LDDs should also list the principal constraints likely to affect any proposed production and processing sites within those areas.</p> <p>Paragraph 3.24 states:</p> <p>...Accordingly, LDD policies should indicate that:</p> <p>- Where initial proposals are environmentally acceptable and accord with the principles of sustainable development, planning permission might be granted for the initial hub of exploration wells, subject to their removal and restoration, if gas is not found</p> <p>in commercially viable quantities (or they are not needed</p>	

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			<p>to keep pumping water to protect production from an adjoining gas area);</p> <ul style="list-style-type: none"> - This does not extend to the later approval of detailed schemes for production from those wells should the occasion arise; - Options for the further development of the area should be presented for consideration in principle at the same time, to ensure that the immediate and potential longer-term environmental impacts of the development are understood by the MPA and that the applicant is aware of the risk of a subsequent refusal of planning permission; - Further hubs of wells for the exploration, appraisal or later production phases will require separate applications and permissions on the same basis, supported where necessary by an environmental statement (or supplementary statement) related to the further development for which permission is sought; and - The industry should therefore discuss its proposals fully with the MPA well before a formal planning application is made, so that all the options and longer-term issues can be properly considered. <p>It is considered important that an energy policy framework is set within the Minerals Plan to recognise CBM, shale gas and other forms of onshore oil and gas as a source of national energy production and the national, strategic and spatial implications of the proposed use of CBM and shale gas as part of the energy suite of resources.</p> <p>Representation</p>	

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			<p>Dart Energy Limited welcomes the recognition given to Coal Bed Methane but believes the references to the importance of CBM and other forms of onshore oil and gas as given in the Joint Minerals Development Plan policies and text require clarification and that there is a need to rectify some inaccuracies. This representation is intended to provide further information to re-enforce the arguments for recognition within the development plan of the importance of unconventional gas and the adoption of specific policy to deal with CBM and shale gas.</p> <p>Dart Energy believes that it is important to reiterate the representations previously made to ensure proper accounts taken of these representations.</p> <p>Policy HQE9 makes reference at Criterion H to future development of oil and gas and coal bed methane. In response to question 36, regarding the adequacy of Policy HQE9, the reference to adequate provision being made “for mitigation of all environmental impacts”, should be revised in line with MPSI. Coal Bed Methane is a much less intensive process than the others identified and we believe a new criterions should be added. The criterion should state:</p> <p>“(I) Proposals for the appraisal, exploration and production of unconventional oil and gas should ensure that likely impacts are identified and satisfactorily addressed. Sites should be fully restored upon completion.”</p> <p>The Government’s Energy White Paper addresses the security of future energy supply, advocating maximising</p>	

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			<p>economic production from our domestic fossil fuel reserves.</p> <p>Minerals Policy Statement I: Planning & Minerals (2006) [MPSI] recognises that minerals are essential to the nations prosperity and quality of life and their ability to help create and develop sustainable communities.</p> <p>It identifies a number of aims to reduce the impact of decreasing offshore gas production, one of which is the aim of encouraging the development of clean coal technologies, [i.e. CBM & shale gas]</p> <p>MPSI seeks that MPAs identify coal reserves and CBM Licence Areas within their Local Development Documents. It also requires that they identify the relevant constraints to development in those areas. We believe that reference should also be made to shale gas which is covered by the same PEDL licence.</p> <p>The area covered by the Minerals Plan contains significant reserves of unworked coal along with other hydrocarbon resources that can make a positive contribution to the nation's energy supply and sustainable economic development of the area by embracing new energy technologies, including CBM and shale gas. It is therefore vital that the Core Strategy recognises the guidance contained in MPSI and the importance of unworked coal seams and shale reservoirs establishing a vision for the area for the next 10 – 15 years, a list of objectives to aid the development of this resources and a suite of strategies and policies to enable its delivery.</p> <p>It is also possible that the coal seams worked could</p>	

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			<p>contribute to carbon capture by chemically bonding carbon dioxide to the coal (using flue gases) as part of a concurrent process of improving the efficiency of methane release.</p> <p>Dart Energy requests that the importance of Unconventional gas and in particular CBM and shale gas is reflected by a specific policy, or an insert into a policy to reflect its importance as an alternative source of energy. Reference should also be made to the importance of safeguarding. Composite Energy believes that the PEDL areas should be identified and safeguarded on the proposals map. Accordingly, Composite Energy requests that the following wording should be included within the core strategy.</p> <p>Supporting Text At page 202 of the original draft, after section on providing for the supply of minerals and policy HQE, insert supporting text and policy as follows:</p> <p>ONSHORE GAS EXTRACTION – Unconventional Gas</p> <p>The Government’s energy policy seeks to encourage the full range of onshore oil and gas as part of a strategy for clean coal technology. This is supported in Minerals Policy Statement 1: Minerals and Planning (MPS1). On-shore gas extraction is comprehensively regulated. The Department of Energy and Climate Change has awarded a Petroleum, Exploration and Development Licences for an area which covers parts of Hull & East Riding of Yorkshire.</p> <p>These PEDL areas have the potential to produce gas from the deep virgin (un-mined) coal seams (at depths of 550m to 1500m) in this area and from shale reservoirs (at depths</p>	

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			<p>of 914m to 3700m). These PEDL areas are also located close to the existing national power (gas and electricity) transmission grid and they are in an important strategic location.</p> <p>Coal Bed Methane (CBM) and shale gas developments provide an opportunity to extract a nationally important natural energy resource without the environmental impact normally associated with coal extraction.</p> <p>The extraction of CBM and shale gas in the Hull & East Riding of Yorkshire area will be incremental in nature and involve more than one exploration and production site. Due to advanced drilling techniques, these sites can be up to 1km apart.</p> <p>Policy – Unconventional Gas</p> <p>Proposals for the extraction of unconventional gas – coal bed methane, shale gas and other forms of onshore oil and gas exploration are in the national interest and will be favourably considered in the Safeguarded Areas indicated on the proposals map.</p> <p>Applications for individual wells or groups of wells as part of the process of exploration and production for onshore unconventional gas exploration, the associated interconnecting pipelines and other essential gas processing or distribution infrastructure to serve more than one development area will be permitted as long as significant adverse environmental impacts do not arise.</p> <p>Applications should be presented with sufficient information to adequately assess the environmental</p>	

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			<p>implications of the proposals including field development plans. Cumulative environmental impacts should be considered and assessed if necessary. Impacts on Natura 2000 sites or European Protected Species will be considered in accord with existing Policies.</p> <p>Conditions and agreements should be attached to planning permissions to ensure the exploration and production operations have an acceptable impact on the local environment or residents. Permissions for wells will be conditioned for the life of the well.</p> <p>We would welcome the opportunity to discuss these matters further with you. In the meantime, please do not hesitate to contact me if you require any further information.</p>	
Mr David Hickling, Hickling Gray Associates	CSFC/651	Support with conditions	<p>In general terms we think the Council has produced a good document, having taken on board many of the points raised in the previous consultation process - in particular the inclusion of "hinterland" villages around larger settlements - although it is not clear how the "10 / 4 dwellings per annum" rule is going to operate in the Primary and Secondary Rural Service Centres and Hinterland villages via the Development Management process.</p> <p>We also welcome the increased total estimate for new dwellings to be built up to 2028, although we note that sites for new dwellings in hinterland and rural service centres cannot be identified and are, in effect, windfall sites. Is the LPA able to fully justify these figures if required to do so by an Inspector bearing in mind the advice in PPS3? We would be strongly opposed to re-allocating any of these dwellings back to the Principal Towns and Local</p>	Comments noted and support welcomed. In response to the consultation comments, the Draft Strategy Document merges the categories of Secondary Rural Service Centres and Hinterland Villages to form Primary Villages. This provides greater clarity on the scale of development anticipated in the Primary Villages (formerly Secondary Rural Service Centres and Hinterland Villages). Allocations will be made in Primary Villages.

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			Service Centres if this issue were to be raised by an Inspector.	
Mr Mark Jones, Barton Willmore on behalf of Mr Paul Butler, Barratt and David Wilson Homes	CSFC/689	Observations	<p>These representations have been prepared on behalf of Barratt and David Wilson Homes East Division who have various land interests throughout the East Riding, including Cottingham, Hessle, Beverley, Driffield, Pocklington and Howden</p> <p>Overall Barratt and David Wilson Homes is generally supportive of the Core Strategy, including the broad development strategy. Our client supports the Council who are increasing the overall housing provision for the East Riding. However, they do not believe the Council has not far enough. It is noted that there is a variety of sources of evidence, which suggests the Council considers a scenario of at least 2,000 (net) dwellings per annum. However, by taking into consideration the latest household projections evidence and shortfall in delivery for 2004 – 2011 suggests that this figure could be nearer 2,400 dwellings.</p> <p>Therefore the Core Strategy should be flexible enough to be able to deal with any changing circumstances arising during the plan period.</p> <p>Our client is however concerned with the proposed affordable housing policy and believes that as currently worded it is fundamentally flawed. Barratt and David Wilson Homes believe that the Council should also consider a range of other scenarios, the findings of which should be reflected in revised policy wording.</p> <p>Barratt and David Wilson Homes wish to be involved in all stages of the Local Development Framework and would be</p>	Comments noted. See also individual responses and comments in the affordable housing section of the report.

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			grateful if you would keep us informed as to the appropriate consultation stage.	
Mr Brian Clarvis, Molescroft Parish Council	CSFC/699	Other	We would refer you to our previous comments on the historic policy emanating from the 1947 T&CP Act when development was to be concentrated on major and minor settlements.	Comment noted.
Mr Brian Clarvis, Molescroft Parish Council	CSFC/703	Other	<p>It seems that a series of more radical and visionary options should be considered when considering the future development, particularly for Beverley which is gradually being swamped by major development proposals.</p> <p>We made these same points at the consultation on the Joint Structure Plan and you may care to review these comments from your files. You will also note that no reference to our more radical suggestions was ever made in the report on consultations, when we considered that a new strategy to create a new settlement using the Hull/Scarborough line as a hub.</p>	Comment noted. The Council takes consultation with communities, businesses and other stakeholders as part of the preparation of the Strategy Document very seriously. As such, the plan strategy and many of its policies have been changed as far as possible to take account of the comments and concerns received from members of the general public.
Mr Mark Jones, Barton Willmore on behalf of Mr Andrew Byrne, Linden Homes	CSFC/706	Object	<p>These representations have been prepared on behalf of Linden Homes Strategic Land who have various land interests throughout the East Riding, including Beverley.</p> <p>Overall Linden is generally supportive of the Core Strategy, including the broad strategy in respect of Beverley.</p> <p>Linden believes that there are a number of important challenges for the East Riding of Yorkshire Council. Linden supports the principle of the Council increasing the overall housing numbers, however our client is concerned that the Council “has not gone far enough”. There are a variety of evidence sources and Linden suggests the Council</p>	Comments noted. See also individual responses and comments in the affordable housing section of the report.

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			<p>considers a scenario of [bold] at least [bold] 2,000 dwellings (net) dwellings per annum. Linden also notes that the latest household projections evidence suggests this figure could be nearer 2,400 dwellings. Therefore the Core Strategy should be flexible enough to be able to deal with any changing circumstances arising during the plan period.</p> <p>There is a need to ensure that the Council ensures that it has a rolling 5 year supply of deliverable housing land and therefore this is likely to require a range of sites in suitable locations, including Greenfield urban extensions to Beverley.</p> <p>Our client is however concerned with the proposed affordable housing policy and believes that as currently worded it is fundamentally flawed. Linden believes the Council should also consider a range of other scenarios, the findings of which should be reflected in revised policy wording.</p> <p>Linden wishes to be involved in all stages of the Local Development Framework and would be grateful if you would keep us informed as to the appropriate consultation stage.</p>	
Mr Brian Clarvis, Molescroft Parish Council	CSFC/707	Observations	These comments are in no way critical of the officers involved in the production of the LDF which has been delayed by the constant meddling of Central Government. The documents are clearly set out and the seminar our representatives attended were well presented considering the complexity of the subject.	Comments noted.
Mrs P.S. Robson	CSFC/712	Observations	1. Affordable homes are imperative.	1. Policy H2 of the Draft Strategy Document aims to provide as many

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			<p>2. As are park and drive's</p> <p>3. Safe routes for horse riders to bridle paths.</p> <p>4. Follow Tamara Hall's example of more allotments.</p> <p>5. More areas for recreation - teenage cafe and hall for their clubs, guides, etc.</p> <p>6. Dentists and doctors surgeries to be incorporated in any new supermarkets - haven't we got enough?</p> <p>7. Why the need to build such large homes? With so many bathrooms. Rainwater to serve lavatories, and rain butts for the gardens to be encouraged.</p> <p>Finally, has anyone done a survey of current houses, bungalows for sale in Beverley in the various categories. With so many advertised, do we really need to be "poaching" arable land to the detriment of world food shortage when so many homes remain unsold.</p>	<p>affordable homes as is viable per development</p> <p>2. Park and Rides [sic] A scheme is proposed to the south of Beverley as part of the Southern Relief Road.</p> <p>3. This is beyond the scope of the Local Plan.</p> <p>4. Allotments and other open space will be provided by the requirements of Policy C3</p> <p>5. The Draft Strategy Document supports the provision of additional community services and facilities (Policy C2).</p> <p>6. Multi-purpose facilities would be supported through the Draft Strategy Documen.</p> <p>7. Policy HI will ensure a variety of house types are provided. A policy also encourages sustainable technologies in new developments.</p> <p>A wide variety of evidence has informed the housing requirements for the Plan. This takes account of people moving.</p>
Mr Richard Wood, Pocklington Town Council	CSFC/746	Support	Pocklington Town Council's response remains very much the same as previously (detailed below) but feel the careful	Comments and support welcomed. The allocation of land for

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			<p>and sensitive selection of the successful land bids for development is crucial to the success of the scheme.</p> <p>Pocklington Town Council's initial response: Pocklington Town Council welcomes controlled integrated overall development in the town and appreciates this will help to keep the area vibrant and moving forward. You might recall councillors previously remarking that the number of new houses planned is, on average, less than the number built in the last 15 years which is pleasing. Large developments in small rural towns can very soon overpower change the character of the town. This can result in it quickly becoming another soulless commuter town serving the larger areas of York, Hull and Leeds. The councillors feel strongly that this should be avoided at all costs. Some local people have become alarmed at the scale of land bids submitted and thought they were all to be developed. It was reassuring to learn that only 15% of this land will be required to reach the development target over the next fifteen years.</p>	<p>development and protection in the future is dealt with by the Allocations Document.</p>
<p>Mr Richard Wood, Pocklington Town Council</p>	<p>CSFC/747</p>	<p>Observations</p>	<p>This council feels the land off West Green should be developed first followed by land south of the town down The Balk. Such developments would not result in extra traffic being generated through the town center. They feel the land surrounding Woldgate College should not be developed as this would result in more traffic going through the town. The land at the football club on The Balk and Cricket Club down Burnby Lane next to the Francis Scaife Sport Center should not be developed as it forms an important open space for sport. The land north of Burnby Road should not be considered as it will adversely affect the nearby flight-path for the gliding Club. The land at both sides of Yapham Road could then be considered along with land at the foot of Chapel Hill.</p>	<p>Individual sites will be considered through the Allocations Document.</p>

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			Councillors were pleased to see there was provision for safeguarding the route of the proposed York-Beverley railway.	
Mr Richard Wood, Pocklington Town Council	CSFC/749	Object	Overall the councillors felt insufficient investigation work has been carried out on the infra-structure of the town to gauge the likely consequences of future developments. They ask that the impact on schools, roads, local health and social service facilities, sports facilities and green spaces and the infrastructure i.e. water, drainage, gas electricity should be investigated and included in the Local Development Framework.	The East Riding Infrastructure study assessed in detail all the present and future needs for infrastructure in the Authority. The delivery plan for this can be seen in the Delivery, Monitoring and Review section of the Draft Strategy Document.
W.R. & P.M. Ayres	CSFC/750	Object	Having attended the 'drop-in' session at Pocklington Library, on Tuesday 29th. November '11, there are a few comments that I would like to make with regard to these Local Development Framework proposals. Firstly however, I feel that the timing of your closing date for responses, of the 19th. December '11., is not very well considered. The proximity to Christmas and all it entails from a time point of view, for both families and individuals, is not conducive to achieving a broad base of opinion on this important subject.	Comment noted. We attempt to consult at times which avoid holiday periods and which do not unnecessarily delay the preparation of the Plan.
Mr Stephen Courcier, Carter Jonas LLP on behalf of C Carver Esq and Family	CSFC/754	Observations	<p>1.0 INTRODUCTION</p> <p>1.1 Carter Jonas LLP welcomes the opportunity to comment upon the Further Consultation Core Strategy published in October 2011.</p> <p>1.2 These representations are submitted on behalf of C Carver Esq. who has land holdings with in North Cave. Some of these land holdings are being promoted for development through the emerging Site Allocations DPD.</p>	Comments noted. The plan has been prepared to be in conformity with the final version of the National Planning Policy Framework (NPPF).

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			<p>1.3 Carter Jonas LLP is keen to work with the Council in bringing forward the Core Strategy and other LDF documents. When adopted the Core Strategy will lie at the heart of the Council's LDF and will guide development in the District for the next 15 years and beyond.</p> <p>1.4 We have provided a structured response which addresses the policies and other parts of the Core Strategy. This response is structured in the following way:</p> <p>1.5 Section 2 outlines the prevailing policy context having regard to PPS1, PPS3, PPS4, PPS12, and Ministerial Statements. We also consider the implications of emerging national government guidance in particular the Draft National Planning Policy Framework (NPPF) which is likely to become adopted policy prior to the examination and adoption of the Core Strategy.</p> <p>1.6 Section 3 and 4 set out our response to the different policies and elements of the Further Consultation Core Strategy.</p> <p>1.7 For completeness, we have completed a representation form which is appended to this statement.</p> <p>2.0 PLANNING POLICY CONSIDERATIONS</p> <p>2.1 Regardless of current state of flux in regional guidance, the Council's LDF needs to be in full conformity with a range of national planning policy considerations and our response is informed by these. As such, it is considered appropriate to provide briefly a commentary on the</p>	

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			<p>elements of this policy and guidance as these will inform our representations into the 'Further Consultation' Core Strategy.</p> <p>GOVERNMENT GUIDANCE</p> <p>2.2 In preparing the Core Strategy, it is worth being mindful of the overarching guidance at the national government level and to a lesser extent the regional level. Although RSS is likely to be revoked before the adoption of the Core Strategy, the Council appears to retain much of its overall strategy.</p> <p>2.3 Revised PPS12 Local Spatial Planning was issued in June 2008. It seeks to simplify the consultation stages and the tests of 'soundness' for the preparation of LDF documents. Whilst the tests themselves are reduced in number from its predecessor, the underlying principles remain and require the Core Strategy to:</p> <ul style="list-style-type: none"> • provide clear, flexible and deliverable policies; • be underpinned and supported by a robust evidence base; • be supported by evidence of community and stakeholder input; and • to demonstrate coherence with other plans, strategies and spending programmes. <p>2.4 Overall, the Core Strategy should reflect the needs and requirements specific to the District and be flexible to changing circumstances.</p> <p>2.5 Central to PPS12 is that the "spatial" planning process should create strong safe and prosperous communities. In</p>	

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			<p>doing so Paragraphs 2.1-2.3 set out how the LDF should assist (public authorities) in:</p> <ul style="list-style-type: none"> • Coordinating delivery of services; • Taking on board the community's views; and • aligning infrastructure provision with the delivery of the Core Strategy. <p>2.6 Turning to other guidance: PPS1 Sustainable Development states that the overarching objective of the planning system is sustainability; in social, physical, economic, energy, environmental and aesthetic terms. Within the document these aspirations are held to be equally applicable to urban and rural settings and environments.</p> <p>2.7 Various supplements have been published to support PPS1 including an Annex on Climate Change.</p> <p>2.8 Government Guidance relating to Housing is contained in PPS3 Housing. When originally published in 2008 this provided a step change in how housing delivery should be managed.</p> <p>It states that housing delivery should reflect a more responsive approach to land supply so that delivery is assured. As a consequence, it is less dogmatic on housing density and the use of brownfield land than its predecessor, requiring Local Planning Authorities to demonstrate how they can be certain that through the planning process, the framework will be set to deliver necessary housing in the correct locations.</p> <p>2.9 Overall the emphasis is upon providing high quality</p>	

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			<p>housing for all in suitable locations; widening opportunities for home ownership; improving affordability by increasing the supply, mix and choice of housing; and the creation and maintenance of sustainable urban and rural communities.</p> <p>2.10 PPS3 emphasises that: ‘everyone has the opportunity of living in a decent home, which they can afford, in a community where they want to live.’ (Para. 9).’</p> <p>2.11 A number of modest changes in June 2010 removed the requirement for housing targets and modified the definition of what constitutes brownfield land; in particular to address the issue of ‘garden grabbing’.</p> <p>2.12 Employment and economic development matters are covered in the PPS4 Planning for Sustainable Economic Growth (December 2009). This represents a shift towards a more positive and holistic interpretation of economic growth which acknowledges the role of all sectors in producing and delivering growth; a step forward given the thinking in previous guidance. PPS4 is focused on: raising productivity, improving accessibility, the consideration of a wider test of ‘need’, promoting social inclusion, building prosperous communities, creating additional employment and linking employment with housing provision including the delivery of investment in all locations.</p> <p>2.13 Policy EC1.1 entitled ‘Using Evidence to Plan Properly’ calls for joint and cooperative working between authorities (and stakeholders) in the preparation of a robust evidence base which should be proportionate to the importance of the issue. In preparing the local evidence base, EC1.3 suggests that it should be informed by the regional assessments, assessing the</p>	

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			<p>detailed need for land or floorspace for economic development along with an assessment and review of existing site allocations, preferably undertaken alongside preparation of the SHLAA.</p> <p>2.14 Policy EC2.1 requires that policies in the development plan should:</p> <ul style="list-style-type: none"> • Set out a clear economic vision; • Support existing business sectors and accommodate emerging and new sectors, • Allow for a quick response to changes in economic circumstances; • Take into account the location and industry specific requirements of business; • Place and co-locate developments, which generate substantial transport movements in locations which are accessible, avoid congestion and preserve local amenity; • Enable the delivery of sustainable transport and other infrastructure needed to support planned economic development, where necessary providing advice on phasing and programming of delivery • Safeguard land from other uses, identifying land for a broad range of economic development including mixed use; and • Consider how different sites can be delivered including the use of compulsory purchase and other planning tools. <p>2.15 'Planning for Growth' Ministerial Statement by Greg Clark, Minister for State for Decentralisation (23 March 2011) states that Local Planning Authorities should press ahead without delay in preparing up to date development plans and should be proactive in driving and supporting</p>	

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			<p>growth.</p> <p>2.16 Local Authorities are expected to ‘support enterprise and facilitate housing, economic and other forms of sustainable development’ and take into account the need to maintain a flexible and responsive supply of land for key sectors, including housing.</p> <p>2.17 East Riding Council’s Core Strategy, Policy SS4 sets a target for the delivery of housing broadly based on provision rates set out in RSS. To support the pro growth agenda, it will be demonstrated that the annual target set out in Policy SS4 is insufficient and as a minimum, the housing provision rate should identify additional growth where there is demand and available land, subject to compliance with sustainability considerations.</p> <p>Emerging Policies</p> <p>2.18 On 25th July 2011, the Government published the Draft National Planning Policy Framework (NPPF). The aim of the NPPF is to consolidate and replace the existing suite of national guidance into a single policy framework. Whilst the NPPF is in draft at this stage, guidance provided by PINS indicates that it is a material consideration insofar as it represents the “direction of travel” of Government policy. This is particularly relevant for the Core Strategy as it moves towards examination in 2012/2013.</p> <p>2.19 At the heart of the NPPF is the expectation that the planning system will deliver sustainable development by balancing economic (prosperity), social (people) and environmental (places) priorities; whilst empowering the planning system to meet both current and future economic</p>	

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			<p>needs. With regards to the Core Strategy there are three key elements that require consideration, the level of housing delivery, the previously developed land targets and duty to co-operate.</p> <p>2.20 The NPPF places significant weight on the need for planning to be positive and to encourage and deliver much needed growth and development, including the supply of housing. At the heart of the NPPF is a presumption in favour of sustainable development whereby LPAs are required to plan positively unless the impacts of the development would significantly and demonstrably outweigh the benefits.</p> <p>2.21 In this respect, paragraph 107 of the NPPF confirms that the Government’s key housing objective is to increase significantly the delivery of new homes. In order to significantly increase the housing supply an additional allowance of 20% should be included within the first five years land supply, similarly the plan must identify specific, developable sites for</p> <p>years 6-10 of the plan and where possible years 11-15.</p> <p>2.22 Paragraph 27 of the NPPF states that ‘Local Plans’ should meet their full market and affordable housing requirement. Paragraph 28 states that LPA’s should prepare a Strategic Housing Market Assessment (SHMA) to identify the scale and mix of housing and the range of tenures that is likely to be required over the plan period which: meets household and population projections, addresses the need for all types of housing, including affordable housing, and caters for housing demand and the scale of housing supply necessary to meet this demand.</p>	

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			<p>2.23 The NPPF removes the requirement for a national/regional target for delivery of development on previously developed land to ensure that settlements with low levels of available PDL are not restricted to lower levels of development. In this respect the Council should not prioritise the allocation of sites that are previously developed.</p> <p>2.24 Section 110 of the Localism Act sets out a new 'duty to co-operate'. Paragraph 44 to 47 of the Draft NPPF gives further guidance on 'planning strategically across local boundaries', and highlights the importance of joint working to meet development requirements that cannot be wholly met within a single local planning area. This duty to cooperate will be a key requirement following the revocation of RSS and it will be necessary for authorities to demonstrate compliance with the duty as part of the independent examination. This will be particularly important for East Riding because of interrelationship with Hull, York and Leeds.</p> <p>SUMMARY</p> <p>2.25 The Core Strategy must adhere to the requirements of PPS12 which can be summarised as:</p> <ul style="list-style-type: none"> • To provide clear, flexible and deliverable policies; • To be underpinned and supported by a robust evidence base; • Be supported by evidence of community and stakeholder input; • To demonstrate coherence with other plans, strategies 	

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			<p>and spending programmes; and</p> <ul style="list-style-type: none"> • The most appropriate strategy when considered against the reasonable alternatives. <p>2.26 Across all tiers of planning policy a number of key themes permeate, foremost amongst which is manifested in meeting the objectively assessed development needs of the district, providing everyone with a decent home, building prosperous communities, and raising the quality of life and environment.</p>	
<p>Mr Stephen Courcier, Carter Jonas LLP on behalf of Mr Huddleston</p>	<p>CSFC/755</p>	<p>Observations</p>	<p>2.0 PLANNING POLICY CONSIDERATIONS</p> <p>2.1 Regardless of current state of flux in regional guidance, the Council's LDF needs to be in full conformity with a range of national planning policy considerations and our response is informed by these. As such, it is considered appropriate to provide briefly a commentary on the elements of this policy and guidance as these will inform our representations into the 'Further Consultation' Core Strategy.</p> <p>GOVERNMENT GUIDANCE</p> <p>2.2 In preparing the Core Strategy, it is worth being mindful of the overarching guidance at the national government level and to a lesser extent the regional level. Although RSS is likely to be revoked before the adoption of the Core Strategy, the Council appears to retain much of its overall strategy.</p> <p>2.3 Revised PPS12 Local Spatial Planning was issued in June 2008. It seeks to simplify the</p>	<p>Comments noted. The plan has been prepared to be in conformity with the final version of the National Planning Policy Framework (NPPF).</p> <p>See also individual responses and comments in the housing and settlement network sections of the report.</p>

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			<p>consultation stages and the tests of ‘soundness’ for the preparation of LDF documents. Whilst the tests themselves are reduced in number from its predecessor, the underlying principles remain and require the Core Strategy to:</p> <ul style="list-style-type: none"> • provide clear, flexible and deliverable policies; • be underpinned and supported by a robust evidence base; • be supported by evidence of community and stakeholder input; and • demonstrate coherence with other plans, strategies and spending programmes. <p>2.4 Overall, the Core Strategy should reflect the needs and requirements specific to the District and be flexible to changing circumstances.</p> <p>2.5 Central to PPS12 is that the “spatial” planning process should create strong, safe and prosperous communities. In doing so Paragraphs 2.1-2.3 set out how the LDF should assist</p> <p>(public authorities) in:</p> <ul style="list-style-type: none"> • coordinating delivery of services; • taking on board the community’s views; and • aligning infrastructure provision with the delivery of the Core Strategy. <p>2.6 Turning to other guidance: PPS1 Sustainable Development states that the overarching objective of the planning system is sustainability; in social, physical, economic, energy, environmental and aesthetic</p>	

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			<p>2.12 Employment and economic development matters are covered in the PPS4 Planning for Sustainable Economic Growth (December 2009). This represents a shift towards a more Representations to East Riding Further Consultation Core Strategy Page 6 of 19 positive and holistic interpretation of economic growth which acknowledges the role of all sectors in producing and delivering growth; a step forward given the thinking in previous guidance. PPS4 is focused on: raising productivity, improving accessibility, the consideration of a wider test of 'need', promoting social inclusion, building prosperous communities, creating additional employment and linking employment with housing provision including the delivery of investment in all locations.</p> <p>2.13 Policy EC1.1 entitled 'Using Evidence to Plan Properly' calls for joint and cooperative working between authorities (and stakeholders) in the preparation of a robust evidence base which should be proportionate to the importance of the issue. In preparing the local evidence base, EC1.3 suggests that it should be informed by the regional assessments, assessing the detailed need for land or floorspace for economic development along with an assessment and review of existing site allocations, preferably undertaken alongside preparation of the SHLAA.</p> <p>2.14 Policy EC2.1 requires that policies in the development plan should:</p> <ul style="list-style-type: none"> • Set out a clear economic vision; • Support existing business sectors and accommodate 	

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			<p>emerging and new sectors,</p> <ul style="list-style-type: none"> • Allow for a quick response to changes in economic circumstances; • Take into account the location and industry specific requirements of business; • Place and co-locate developments, which generate substantial transport movements in locations which are accessible, avoid congestion and preserve local amenity; • Enable the delivery of sustainable transport and other infrastructure needed to support planned economic development, where necessary providing advice on phasing and programming of delivery • Safeguard land from other uses, identifying land for a broad range of economic development including mixed use; and • Consider how different sites can be delivered including the use of compulsory purchase and other planning tools. <p>2.15 'Planning for Growth' Ministerial Statement by Greg Clark, Minister for State for Decentralisation (23 March 2011) states that Local Planning Authorities should press Representations to East Riding Further Consultation Core Strategy Page 7 of 19 ahead without delay in preparing up to date development plans and should be proactive in driving and supporting growth.</p> <p>2.16 Local Authorities are expected to 'support enterprise and facilitate housing, economic and other forms of sustainable development' and take into account the need to maintain a flexible and responsive supply of land for key sectors, including housing.</p> <p>2.17 East Riding Council's Core Strategy, Policy SS4 sets a</p>	

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			<p>target for the delivery of housing broadly based on provision rates set out in RSS. To support the pro growth agenda, it will be demonstrated that the annual target set out in Policy SS4 is insufficient and, as a minimum, the housing provision rate should identify additional growth where there is demand and available land, subject to compliance with sustainability considerations.</p> <p>EMERGING POLICIES</p> <p>2.18 On 25th July 2011, the Government published the Draft National Planning Policy Framework (NPPF). The aim of the NPPF is to consolidate and replace the existing suite of national guidance into a single policy framework. Whilst the NPPF is in draft at this stage, guidance provided by PINS indicates that it is a material consideration insofar as it represents the “direction of travel” of Government policy. This is particularly relevant for the Core Strategy as it moves towards examination in 2012/2013.</p> <p>2.19 At the heart of the NPPF is the expectation that the planning system will deliver sustainable development by balancing economic (prosperity), social (people) and environmental (places) priorities; whilst empowering the planning system to meet both current and future economic needs. With regards to the Core Strategy there are three key elements that require consideration, the level of housing delivery, the previously developed land targets and duty to co-operate.</p>	

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			<p>2.20 The NPPF places significant weight on the need for planning to be positive and to encourage and deliver much needed growth and development, including the supply of housing. At the heart of the NPPF is a presumption in favour of sustainable development whereby LPAs are required to plan positively unless the impacts of the development would significantly and demonstrably outweigh the benefits. Representations to East Riding Further Consultation Core Strategy Page 8 of 19</p> <p>2.21 In this respect, paragraph 107 of the NPPF confirms that the Government’s key housing objective is to increase significantly the delivery of new homes. In order to significantly increase the housing supply an additional allowance of 20% should be included within the first five years’ land supply, similarly the plan must identify specific, developable sites for years 6-10 of the plan and where possible years 11-15.</p> <p>2.22 Paragraph 27 of the NPPF states that ‘Local Plans’ should meet their full market and affordable housing requirement. Paragraph 28 states that LPA’s should prepare a Strategic Housing Market Assessment (SHMA) to identify the scale and mix of housing and the range of tenures that is likely to be required over the plan period which: meets household and population projections, addresses the need for all types of housing, including affordable housing, and caters for housing demand and the scale of housing supply necessary to meet this demand.</p> <p>2.23 The NPPF removes the requirement for a national/regional target for delivery of development on</p>	

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			<p>previously developed land to ensure that settlements with low levels of available PDL are not restricted to lower levels of development. In this respect the Council should not prioritise the allocation of sites that are previously developed.</p> <p>2.24 Section 110 of the Localism Act sets out a new 'duty to co-operate'. Paragraph 44 to 47 of the Draft NPPF gives further guidance on 'planning strategically across local boundaries', and highlights the importance of joint working to meet development requirements that cannot be wholly met within a single local planning area. This duty to cooperate will be a key requirement following the revocation of RSS and it will be necessary for authorities to demonstrate compliance with the duty as part of the independent examination. This will be particularly important for East Riding because of its interrelationship with Hull, York and Leeds.</p> <p>Representations to East Riding Further Consultation Core Strategy Page 9 of 19</p> <p>SUMMARY</p> <p>2.25 The Core Strategy must adhere to the requirements of PPS12 which can be summarised as:</p> <ul style="list-style-type: none"> • To provide clear, flexible and deliverable policies; • To be underpinned and supported by a robust evidence base; • Be supported by evidence of community and stakeholder 	

Consultee/Agent	ID	Nature Of Response:	Response	Officer Comments
			<p>input;</p> <ul style="list-style-type: none"> • To demonstrate coherence with other plans, strategies and spending programmes; and • The most appropriate strategy when considered against the reasonable alternatives. <p>2.26 Across all tiers of planning policy a number of key themes permeate, foremost amongst which is meeting the objectively assessed development needs of the district, providing everyone with a decent home, building prosperous communities, and raising the quality of life and environment.</p> <p>3.0 FURTHER CONSULTATION CORE STRATEGY</p> <p>3.1 Within this response, our comments are directed at specific elements of the Core Strategy which we consider make the document unsound. Each section within this report corresponds to either a chapter or policy within the document and addresses the issues of soundness set out in PPS12. A copy of the completed representation form is attached to this report.</p> <p>3.2 Having read the Core Strategy and much of its supporting evidence we feel the Council should be commended for the thorough way in which the Further Consultation Core Strategy is presented. Nevertheless there remain significant parts of the document which are in need of modification in order to make the document sound.</p>	

Consultee/Agent	ID	Nature Of Response:	Response	Officer Comments
			<p>3.3 The principal aim of this report is to demonstrate that East Riding should be providing more land for housing and that a greater proportion of that growth should be directed to Rural Service Centres, especially those surrounding the City of York.</p> <p>3.4 It is considered that a significant amount of work still needs to be done to make the Core Strategy sound. As it stands the Core Strategy is:</p> <ul style="list-style-type: none"> • Not justified because is not based on a robust and credible evidence base, and is not the most appropriate strategy when considered against alternatives; • Not effective due to lack of flexibility; and • Not consistent with existing and emerging national planning policy principally PPS12, PPS3 and Draft NPPF. <p>4.0 SUMMARY AND CONCLUSIONS</p> <p>4.1 Carter Jonas LLP welcomes the opportunity to submit representations to the Further Consultation Core Strategy and we commend the Council for the evident work they have undertaken to take this document to its current form.</p> <p>4.2 These representations demonstrate that the Core Strategy should be providing for a much higher level of housing growth. From analysis of the evidence base and most up to date evidence sources, it is clear that East Riding should be looking to accommodate a minimum of 2350 net additions to the housing stock per annum. It is</p>	

Consultee/Agent	ID	Nature Of Response:	Response	Officer Comments
			<p>also evident that significantly more growth should be directed to those settlements in the Vale of York which have the necessary capacity to deliver the required scale of development and where there is a high level of need and demand, such as Holme on Spalding Moor.</p> <p>4.3 We hope these comments are of assistance and that their content can be reflected in the forthcoming submission draft of the Core Strategy. We look forward to further engagement with the Council.</p>	
<p>Mr Stephen Courcier, Carter Jonas LLP on behalf of C Carver Esq and Family</p>	<p>CSFC/760</p>	<p>Observations</p>	<p>Within this response, our comments are directed at specific elements of the Core Strategy which we consider make the document unsound. Each section within this report corresponds to either a chapter or policy within the document and addresses the issues of soundness set out in PPS12. A copy of the completed representation form is attached to this report.</p> <p>Having read the Core Strategy and much of its supporting evidence we feel the Council should be commended for the thorough way in which the Further Consultation Core Strategy is presented. Nevertheless there remain significant parts of the document which are in need of modification in order to make the document sound.</p> <p>The principal aim of this report is to demonstrate that East Riding should be providing more land for housing and that a greater proportion of that growth should be directed to Primary and Secondary Rural Service Centres, such as North Cave.</p> <p>It is consider that a significant amount of work still needs to be done to make the Core Strategy sound. As it stands the Core Strategy is:</p>	<p>Comments noted. The plan has been prepared to be in conformity with the final version of the National Planning Policy Framework (NPPF).</p>

Consultee/Agent	ID	Nature Of Response:	Response	Officer Comments
			<ul style="list-style-type: none"> • Not justified because is not based on an robust and credible evidence base, and is not the most appropriate strategy when considered against alternatives; • Not effective due to lack of flexibility; and • Not consistent with existing and emerging national planning policy principally PPS12, PPS3 and Draft NPPF. 	
Mr Stephen Courcier, Carter Jonas LLP on behalf of C Carver Esq and Family	CSFC/764	Support with conditions	<p>Carter Jonas LLP welcomes the opportunity to submit representations to the Further Consultation Core Strategy and we commend the Council for the evident work they have undertaken to take this document to its current form.</p> <p>These representations demonstrate that the Core Strategy should be providing for a much higher level of housing growth. From analysis of the evidence base and most up to date evidence sources, it is clear that East Riding should be looking to accommodate a minimum of 2350 net additions to the housing stock per annum.</p> <p>We also consider that North Cave should be designated as Primary Rural Service Centre because of its important local service centre role and its comprehensive range of services and facilities. It is also evident that more growth should be directed to Primary and Secondary Rural Service Centres in order to preserve their long term vitality and viability.</p> <p>We hope these comments are of assistance and that their content can be reflected in the forthcoming submission draft of the Core Strategy. We look forward to further engagement with the Council.</p>	Comments noted. See also individual responses and comments in the housing and settlement network sections of the report.

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Mr Alex Codd, Hull City Council	CSFC/775	Observations	<p>Overall the document could have been improved through the inclusion of a new key diagram map to reflect the changes being consulted upon. This would have been particularly useful in gauging the spatial impact of raising the total housing figure to 25,500, and the annual target from 1,100 to 1,500. There is a real need to convert the housing figures to housing allocations on the ground. Hull City Council would also like these maps to confirm that no urban extensions to Hull would occur.</p> <p>Hull City Council also considers that the document is not clear in that it is a partial update and this could have been reflected in the title of the consultation.</p> <p>Appendix B refers to required improvements to the A1033/A63 capacity to serve Hedon Haven employment site. Does this refer to improvements needed in the City. If so, it should be stated.</p> <p>The funding source should refer to the "National Roads Programme" rather than "Major scheme funding bids"</p> <p>The section on Bus Services refers to the need for "enhanced bus services" this could perhaps be extended to refer to "enhanced bus services and Park and Ride into the City".</p> <p>Within the Hull City Council's core strategy the designation of the Enterprise Zone to the East of the city is included on the updated key diagram and it is considered such an amendment would be appropriate for the sites at Brough and Hedon Haven within the East Riding's key diagram.</p>	<p>Comments noted. A Key Diagram is included in the Draft Strategy Document. It shows the Enterprise Zones within the East Riding. A Draft Allocations Document has also been prepared showing specific sites.</p> <p>Comments regarding partial update and the suggestions for the infrastructure Delivery Plan are noted.</p>

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			<p>Both authorities are preparing a Memorandum of Understanding (MoU) which will be taken before both authorities cabinets in the New year. This MoU will outline how the authorities are working together to ensure each core strategy complements each other. Specific items to be addressed within the MoU include housing, employment and the enterprise zones, waste and minerals and flood management matter to name a few. This MoU is being produced to demonstrate how both authorities are fulfilling their duty to co-operate. As a whole Hull City Council broadly support the direction of the Eats Riding of Yorkshire's core strategy.</p>	
Mr David Hand, Scarborough Borough Council	CSFC/783	Support	Scarborough Borough Council have no objections to the Core Strategy and support the approach.	Support welcomed.
Cllr Charles Bayram, ERYC	CSFC/784	Object	<p>Explanation</p> <p>I would like to start my response with a brief explanation of how I see my involvement.</p> <p>I am a farmer living in the village of North Cave. The longest serving member of that Parish Council. A member of the Lower Ouse and Market Weighton drainage boards. A member of the East Riding of Yorkshire Unitary Authority for over 12 years; currently the Ward Member for Howden. I also am the longest serving Member of the Authority's Development Control Planning Committee. The only member with an interest in planning and has attended any outside training.</p> <p>I have discussed basic principles with the ministers Bob Neill, Grant Shapps, Greg Clark and the Professor of Planning at the Bartlett University College London, Sir</p>	Comments noted. The plan has been prepared in accordance with the relevant legal requirements and council's protocols.

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			<p>Peter Hall.</p> <p>I am also aware that Sir Desmond Heap's used the following in this 1949 first edition [The Outline of New Planning Law] "Ultimately the only plan people will enjoy is the one they make themselves."</p> <p>A plan of this nature is an interpretation of national policy, by the people for the people of that Authority. Produced and implemented by that Authority. Unless a plan can be embraced, accepted and enjoyed by those who are affected by it, a plan will have little value.</p> <p>The role of a Councillor was re-cast in the early 1830's, to ensure the Corporation acts within the law and to ensure national policy is interpreted into local policy in the interest of the community, rather than that of the Authority.</p> <p>Looking at the draft in a wide context and the manner in which it has been created, is giving me grave concern.</p> <p>But I must stress that this response is made on my own behalf.</p> <p>The process</p> <p>The Authority may have followed the Planning regulations. But to involve Councillors or the Council in the process "other than to respond to successive drafts", the process would have to take the "Local Authority's functions and responsibilities (England) Regulation 2000/2853 as amended" into account.</p>	

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			<p>Any plan, policy or strategy which together make up the Development Plan, is a Schedule 3 function and subject to Regulation 4. Having discussed the matter at length with Greg Clark MP, I then sent him a note asking for brief clarification from his department, I am attaching that response.</p> <p>The Authority do not consider that the approval, for public consultation, of draft proposals is a key decision. None of the drafts have been approved by the council, but more importantly, they have not been subject to the Cabinet 4 Month Forward Work Plan. Four months before a key decision is made, it must be announced on the Forward Work Plan and registered, giving Councillors and the public an opportunity to request policy's to be examined by an Overview and Scrutiny Committee.</p> <p>This is the only opportunity in which the views of the community can be fed into the process, it also gives Councillors an opportunity to be properly involved.</p> <p>There are currently 3 tests of soundness; the plan must be justified, effective and consistent. Questions asked by the Authority do not cover the key matters or principles. The question is; does the plan meet local development needs in a sustainable way? My response is, no.</p>	
Mr Pete Sulley, Barton Willmore on behalf of Trustees of the Needler Settlement	CSFC/787	Other	<p>These representations have been prepared by Barton Willmore on behalf of The Trustees of the Needler D4 Settlement (hereafter referred to as 'The Trustees').</p> <p>1.2 These representations are in relation to the 'East Riding Local Development Framework – Core Strategy Further Consultation' (October 2011) (hereafter referred to as the 'Further Consultation'). The aim of this report is</p>	<p>Comments noted.</p> <p>Individual sites are considered through the Allocations Document.</p> <p>As this response is a summary of the responses made by the consultee, please see their specific responses in</p>

Consultee/Agent	ID	Nature Of Response:	Response	Officer Comments
			<p>to assist the Council in formulating their Local Development Framework, having particular regard to the situation at Beverley and a mixed use development of the below site:</p> <ul style="list-style-type: none"> • Land to the south of Beverley. <p>1.3 The exact details of the proposals are not yet known, and an approximate mix can and will be discussed with Council officers at the appropriate time. The site can be developed in isolation, or as part of a comprehensive scheme with land to the north, but it is recognised that development would need to occur prior to the release of The Trustees' land, be it the land to the north or the proposed Beverley Southern Bypass to the south.</p> <p>1.4 Given the location of the site to the south of residential development in Beverley and to the north of the proposed Beverley Southern Bypass, and in close proximity to the Beverley Leisure Centre and the Flemingate development, it is envisaged that the site can accommodate a variety of uses.</p> <p>1.5 Residential development can be provided to complement the existing residential development to the north. Employment uses could be provided, with excellent access from the new bypass once constructed, which can deliver Beverley's future employment needs as well as commercial uses complementary to the bypass itself, such as a service station, small hotel or leisure uses. It is envisaged that whatever form of development is progressed quality open space in accordance with adopted standards will be provided.</p>	<p>the other sections of the report for the officer comments.</p> <p>Please note that the NPPF re-affirms the legal position that planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise (paragraph 11 of the NPPF).</p>

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			<p>1.6 The Site Allocations DPD highlights land earmarked for the proposed Park and Ride scheme as being safeguarded and this will have to be shown due regard should it progress. However, there is considerable doubt as to whether it will progress, evidenced by the recent application to downgrade it from 750 spaces to 500 spaces, and The Trustees continue to object to its proposed location given that there are more appropriate and more sustainable locations available, as highlighted in The Trustees' objections to the above mentioned planning application.</p> <p>1.7 The Compulsory Purchase Order (CPO) for the Beverley Southern Bypass on the original route, without the Park and Ride or accompanying roundabout, has recently been published. The route of the bypass passes through The Trustees' land, and The Trustees control sufficient land north and south of the bypass to construct a roundabout should it be required to access the land subject to these representations; this may be required if the Park and Ride does not progress. It must be noted that The Trustees do not object to the CPO or the bypass, but they continue to object to the Park and Ride.</p> <p>1.8 Therefore, notwithstanding this latter point, the site is considered suitable for a comprehensive mixed use development consisting of a variety of uses.</p> <p>1.9 The site is outlined in red on the plan attached at Appendix I. A further plan highlights the extent of The Trustees' ownership, marked in blue, and the extent of the land that could be contained within a comprehensive development of the south of Beverley which involved</p>	

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			<p>additional sites in third party ownership; the southern boundary of this comprehensive development has been established based on the route of the proposed Beverley Southern Bypass. This plan is attached at Appendix 2. [See attached file for appendix 1 and 2]</p> <p>1.10 The Site comprises part of a site contained within the Allocations Development Plan Document – Potential Sites Consultation that was subject to public consultation in 2010 plus additional land. The part of the site above is also referred to in the Strategic Housing Land Availability Assessment (SHLAA), which is partly derived from interested parties submitting Land Bids, and again The Trustees’ land incorporates part of this site as well as additional land. The site therefore has several reference numbers and these are set out below for completeness.</p> <p>Site: Land to the south of Beverley</p> <p>SHLAA ID Reference: Southern part of Beverley 32, plus additional land not previously identified in the SHLAA</p> <p>Site AllocationsDPD Reference: Southern part of BEV12, plus additional land not previously identified in the AllocationsDPD</p> <p>Land Bid Reference:* * A SHLAA land bid comprising the entire site subject to these representations, and no other land parcels outside the control of The Trustees, has been submitted but to date no Land Bid reference has been allocated.</p> <p>1.11 The Trustees wholly own and control the land contained within Appendix 1. Beverley 19 and Beverley 32</p>	

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			<p>(SHLAA references) and BEV12 (Allocations DPD reference) are owned and controlled by third parties.</p> <p>1.12 Barton Willmore has previously made representations on the 'Core Strategy – Issues and Options' document in June 2008, the 'Preferred Approach Core Strategy' in July 2010 and the Site Allocations DPD in July 2010.</p> <p>1.13 The responses that East Riding received to the Preferred Approach Core Strategy identified the need to consider some important amendments to certain policies; these are contained in the Further Consultation. These representations are a response to those changes and questions addressed in the Further Consultation document.</p> <p>1.14 In summary, the representations refer to the following sections of the Core Strategy Further Consultation:</p> <ul style="list-style-type: none"> • Place Statements – Question 1: The Place Statement in relation to Beverley needs to be more positively worded, to reflect the RSS, current National Guidance and the Draft National Planning Policy Framework, to ensure that it is correctly interpreted and applied, enabling the Council's Vision and Objectives as set out in the Core Strategy, Our East Riding and Business Plan to be achieved. • Settlement Network – Question 2: There are no representations to make in relation to the amended approach to the Settlement Network. • Settlement Network – Question 3: There is general support for the revised approach to Hinterland Villages, 	

Consultee/Agent	ID	Nature Of Response:	Response	Officer Comments
			<p>Rural Villages and the Countryside.</p> <ul style="list-style-type: none"> • Scale and Distribution of Development – Question 4: There is a concern that there is an over reliance on short term migration patterns in establishing requisite housing numbers, and therefore the required housing numbers are too low; there is insufficient flexibility in the wording of Policy SS4 to allow for greenfield extensions, which is the only way to accommodate the required dwellings over the Plan period (as set out in the Further Consultation and therefore notwithstanding comments on actual housing numbers), and there is concern about the reduction in the percentage requirement of housing provision being directed to the Principal Towns, which is set at 43.5% as opposed to the 45% as set out in the Preferred Approach Core Strategy. • Scale and Distribution of Development – Question 5: There is support for the increased provision of employment land, but flexibility needs to be factored in to the policy so that should employment use not be forthcoming on land allocated for such use, then alternative uses will be considered on their merits; this is in line with paragraph 75 of the Draft NPPF which seeks to prevent the long term protection of employment land or floorspace. • Development Policies- Question 6: There is a significant concern with Revised Policy HBHM2 in relation to the provision of Affordable Housing. Whilst it is acknowledged that East Riding needs to address an existing shortfall in affordable housing provision, the evidence base has been completely misapplied in the policy and there is no 	

Consultee/Agent	ID	Nature Of Response:	Response	Officer Comments
			<p>evidence to support the site size thresholds or percentage of affordable housing that have been set out in the policy. To compound this the policy states that 'at least' x% should be provided, depending on the housing market area, which is even further from the Council's own evidence base. Further, 'other' costs have been underestimated such as abnormal costs, build costs or Section 106 contributions. As such, the policy as drafted is fundamentally flawed and is therefore wholly unsound, thereby failing the tests set out in Planning Policy Statement 12: Local Spatial Planning.</p> <ul style="list-style-type: none"> • Development Policies – Question 7: There are some concerns with Revised Policy SHC4 in that there is insufficient flexibility factored in to the policy. Further, the Open Space Review 2010 evidence base which largely informed this policy recommends that there should be minimum standards for certain open space typologies and minimum standards where practicable and for other open space typologies. There is no distinction between these two categories in the revised policy as drafted therefore the evidence base has not been correctly applied. The policy also states that 'Residential development that increases demand for open space will be required to address this demand in line with the standards of provision set out in Table 4'. However, the Open Space Review states that some residential development, such as dwellings with less than 2 bedrooms or sheltered accommodation, do not require additional open space, and the policy should be revised to clarify this. <p>1.15 Where Barton Willmore has made comments in previous Core Strategy consultation documents that have not resulted in subsequent revisions in this Further</p>	

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			<p>Consultation then our original representations still prevail, although they have largely not been repeated in this document for reasons of brevity.</p> <p>Draft National Planning Policy Framework</p> <p>1.16 However, since the Preferred Approach Core Strategy consultation period between May and July 2010, the Government has published the Draft National Planning Policy Framework (NPPF). Once adopted this will supersede all Planning Policy Statements and Planning Policy Guidance Notes.</p> <p>1.17 The Draft NPPF has a more positive approach to growth, with the Rt Hon Greg Clark MP, Minister for Planning, stating in his foreword that ‘...sustainable development is about positive growth – making economic, environmental and social progress for this and future generations’. This positive approach is continued throughout the whole draft document.</p> <p>1.18 The Draft NPPF also reintroduces the concept of ‘a presumption in favour of sustainable development’ as opposed to the maxim of recent years which has been ‘development in accordance with the development plan unless material considerations indicate otherwise’. Whilst these two strategies go hand in hand in terms of aiming to achieve sustainable development there is a clear shift in emphasis in the Draft NPPF to a more positive and proactive planning system.</p> <p>1.19 Advice issued by The Planning Inspectorate states that ‘It is capable of being a material consideration, although the weight to be given to it will be a matter for the decision</p>	

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			<p>maker in each particular case’.</p> <p>1.20 Firstly, this therefore significantly strengthens the case for not only drafting positive Visions, objectives and policies but also for a positive interpretation of these Visions, objectives and policies. Consequently, the representations made in relation to the Preferred Approach Core Strategy in July 2010 carry extra resonance.</p> <p>1.21 Secondly, it is concerning that the Draft National Planning Policy Framework is not mentioned once in the Further Consultation document. In addition, there are no indications of the more positive emphasis on development contained in the Draft NPPF being taken forward into the Further Consultation. Therefore it is not evident that this important document has been considered appropriately in this Further Consultation.</p>	
Mr Pete Sulley, Barton Willmore on behalf of Central Land Holdings	CSFC/788	Observations	<p>These representations have been prepared by Barton Willmore on behalf of Central Land Holdings Limited, who has a number of interests within East Riding at Beverley, Anlaby, Goole and North Kingswood (south of Wawne).</p> <p>These representations are in relation to the ‘East Riding Local Development Framework – Core Strategy Further Consultation’ (October 2011) (hereafter referred to as the ‘Further Consultation’). The aim of this report is to assist the Council in formulating their Local Development Framework, having particular regard to the situation at Beverley and residential development of the below sites:</p> <ul style="list-style-type: none"> • Land to the West of Queensgate and St Martin’s Cemeteries and Beverley 	<p>Comments noted.</p> <p>The allocation of individual sites are considered through the Allocations Document.</p> <p>As this response is a summary of the responses made by the consultee, please see their specific responses in the other sections of the report for the officer comments.</p> <p>Please note that the NPPF re-affirms the legal position that planning permission must be determined in accordance with the development</p>

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			<p>Grammar School, Beverley, and;</p> <ul style="list-style-type: none"> • Land to the South of Figham Link Road, Beverley. <p>[SEE ATTACHMENT FOR SITE LOCATION PLANS]</p> <p>Both of these sites are attached at Appendix I. The Sites comprise a number of sites within the Allocations Development Plan Document – Potential Sites Consultation that was subject to public consultation in 2010. They are also referred to in the Strategic Housing Land Availability Assessment (SHLAA), which is partly derived from interested</p> <p>parties submitting Land Bids. The sites therefore have several reference numbers and these are set out below for completeness.</p> <p>Site: Land to the West of Queensgare and St. Martin's Cemeteries and Beverley Grammar School, Beverley</p> <p>SHLAA ID Reference: Beverley12 and Beverley 28</p> <p>Site Allocations DPD Reference: BEV6 and BEV7</p> <p>Land Bid Reference: 756</p> <p>&</p> <p>Site: Land to the South of Figham Link Road, Beverley</p> <p>SHLAA ID Reference: Beverley20 (area north of Willow Lane only)</p>	<p>plan unless material considerations indicate otherwise (paragraph 11 of the NPPF).</p>

Consultee/Agent	ID	Nature Of Response:	Response	Officer Comments
			<p>Site Allocations DPD Reference: BEV10 (area north of Willow Lane only)</p> <p>Land Bid Reference: 758</p> <p>Central Land Holdings wholly owns and controls the Beverley 12 and BEV6 element of the Land to the West of Queensgate and St Martin's Cemeteries and Beverley Grammar School site. Central Land Holdings wholly owns and controls the land within the red line as shown at Appendix 1, which forms the northern part of Beverley 20 and BEV10.</p> <p>Barton Willmore has previously made representations on the 'Core Strategy – Issues and Options' document in June 2008, the 'Preferred Approach Core Strategy' in July 2010 and the Site Allocations DPD in July 2010.</p> <p>The responses that East Riding received to the Preferred Approach Core Strategy identified the need to consider some important amendments to certain policies; these are contained in the Further Consultation. These representations are a response to those changes and questions addressed in the Further Consultation document.</p> <p>In summary, the representations refer to the following sections of the Core Strategy Further Consultation:</p> <ul style="list-style-type: none"> • Place Statements – Question 1: The Place Statement in relation to Beverley needs to be more positively worded, to reflect the RSS, current National Guidance and the Draft National Planning Policy Framework, to ensure that it is correctly interpreted and applied, enabling the 	

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			<p>Council's Vision and Objectives as set out in the Core Strategy, Our East Riding and Business Plan to be achieved.</p> <ul style="list-style-type: none"> • Settlement Network – Question 2: There are no representations to make in relation to the amended approach to the Settlement Network. • Settlement Network – Question 3: There is general support for the revised approach to Hinterland Villages, Rural Villages and the Countryside. • Scale and Distribution of Development – Question 4: There is a concern that there is an over reliance on short term migration patterns in establishing requisite housing numbers, and therefore the required housing numbers are too low; there is insufficient flexibility in the wording of Policy SS4 to allow for greenfield extensions, which is the only way to accommodate the required dwellings over the Plan period (as set out in the Further Consultation and therefore notwithstanding comments on actual housing numbers), and there is concern about the reduction in the percentage requirement of housing provision being directed to the Principal Towns, which is set at 43.5% as opposed to the 45% as set out in the Preferred Approach Core Strategy. • Development Policies – Question 6: There is a significant concern with Revised Policy HBHM2 in relation to the provision of Affordable Housing. Whilst it is acknowledged that East Riding needs to address an existing shortfall in 	

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			<p>affordable housing provision, the evidence base has been completely misapplied in the policy and there is no evidence to support the site size thresholds or percentage of affordable housing that have been set out in the policy.</p> <p>To</p> <p>compound this the policy states that ‘at least’ x% should be provided, depending on the housing market area, which is even further from the Council’s own evidence base. Further, ‘other’ costs have been underestimated such as</p> <p>abnormal costs, build costs or Section 106 contributions. As such, the policy as drafted is fundamentally flawed and is therefore wholly unsound, thereby failing the tests set out in Planning Policy Statement 12: Local Spatial Planning.</p> <ul style="list-style-type: none"> • Development Policies – Question 7: There are some concerns with Revised Policy SHC4 in that there is insufficient flexibility factored in to the policy. Further, the Open Space Review 2010 evidence base which largely informed this policy recommends that there should be minimum standards for certain open space typologies and minimum standards where practicable and for other open space typologies. There is no distinction between these two categories in the revised policy as drafted therefore the evidence base has not been correctly applied. The policy also states that ‘Residential development that increases demand for open space will be required to address this demand in line with the standards of provision set out in Table 4’. However, the Open Space Review states that some residential development, such as dwellings with less than 2 bedrooms or sheltered accommodation, do not require additional open space, and the policy should be revised to clarify this. 	

Consultee/Agent	ID	Nature Of Response:	Response	Officer Comments
			<p>Where Barton Willmore has made comments in previous Core Strategy consultation documents that have not resulted in subsequent revisions in this Further Consultation then our original representations still prevail, although they have largely not been repeated in this document for reasons of brevity.</p> <p>Draft National Planning Policy Framework</p> <p>However, since the Preferred Approach Core Strategy consultation period between May and July 2010, the Government has published the Draft National Planning Policy Framework (NPPF). Once adopted this will supersede all Planning Policy Statements and Planning Policy Guidance Notes.</p> <p>The Draft NPPF has a more positive approach to growth, with the Rt Hon Greg Clark MP, Minister for Planning, stating in his foreword that ‘...sustainable development is about positive growth – making economic, environmental and social progress for this and future generations’. This positive approach is continued throughout the whole draft document.</p> <p>The Draft NPPF also reintroduces the concept of ‘a presumption in favour of sustainable development’ as opposed to the maxim of recent years which has been ‘development in accordance with the development plan unless material considerations indicate otherwise’. Whilst these two strategies go hand in hand in terms of aiming to achieve sustainable development there is a clear shift in emphasis in the Draft NPPF to a more positive and proactive planning system.</p>	

Consultee/Agent	ID	Nature Of Response:	Response	Officer Comments
			<p>Advice issued by The Planning Inspectorate states that 'It is capable of being a material consideration, although the weight to be given to it will be a matter for the decision maker in each particular case'.</p> <p>Firstly, this therefore significantly strengthens the case for not only drafting positive Visions, objectives and policies but also for a positive interpretation of these Visions, objectives and policies. Consequently, the representations made in relation to the Preferred Approach Core Strategy in July 2010 carry extra resonance.</p> <p>Secondly, it is concerning that the Draft National Planning Policy Framework is not mentioned once in the Further Consultation document. In addition, there are no indications of the more positive emphasis on development contained in the Draft NPPF being taken forward into the Further Consultation. Therefore it is not evident that this important document has been considered appropriately in this Further Consultation.</p>	
Mr Pete Sulley, Barton Willmore on behalf of Central Land Holdings	CSFC/789	Other	<p>1.1 These representations have been prepared by Barton Willmore on behalf of Central Land Holdings Limited, who has a number of interests within East Riding at Anlaby, Beverley, Goole and North Kingswood (south of Wawne).</p> <p>1.2 These representations are in relation to the 'East Riding Local Development Framework – Core Strategy Further Consultation' (October 2011) (hereafter referred to as the 'Further Consultation'). The aim of this report is to assist the Council in formulating their Local Development Framework, having particular regard to the situation at Anlaby and residential development, including significant open space provision, of the below site:</p>	<p>Comments noted.</p> <p>Individual sites are considered through the Allocations Development.</p> <p>As this response is a summary of the responses made by the consultee, please see their specific responses in the other sections of the report for the officer comments.</p> <p>Please note that the NPPF re-affirms</p>

Consultee/Agent	ID	Nature Of Response:	Response	Officer Comments
			<ul style="list-style-type: none"> • Anlaby Park, Anlaby. <p>1.3 The site is attached at Appendix I and is wholly owned and controlled by Central Land Holdings. The Site comprises two sites within the Allocations Development Plan Document – Potential Sites Consultation that was subject to public consultation in 2010. The site is also referred to in the Strategic Housing Land Availability Assessment (SHLAA), and again is split into two; it also has further reference numbers allocated to submitted Land Bids. The site therefore has several reference numbers and these are set out below for completeness.</p> <p>Site SHLAA ID reference: Anlaby 6 and Anlaby 12</p> <p>Site Allocations DPD Reference: AWK8 and AWK9</p> <p>Land Bid Reference: 802 and 1738</p> <p>1.4 Barton Willmore has previously made representations on the ‘Core Strategy – Issues and Options’ document in June 2008, the ‘Preferred Approach Core Strategy’ in July 2010 and the ‘Site Allocations Development Plan Document’ in July 2010.</p> <p>1.5 As stated in paragraphs 1.3 – 1.6 of the Further Consultation, the responses that East Riding received in relation to the Preferred Approach Core Strategy identified the need to consider some important amendments to certain policies; these are contained in the Further Consultation. These representations are a response to those changes and questions addressed in the Further Consultation document.</p>	<p>the legal position that planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise (paragraph 11 of the NPPF).</p>

Consultee/Agent	ID	Nature Of Response:	Response	Officer Comments
			<p>1.7 Where Barton Willmore has made comments in previous Core Strategy consultation documents that have not resulted in subsequent revisions in this Further Consultation then our original representations still prevail, although they have largely not been repeated in this document for reasons of brevity.</p> <p>1.8 However, since the Preferred Approach Core Strategy consultation period between May and July 2010, the Government has published the Draft National Planning Policy Framework (NPPF). Once adopted this will supersede all Planning Policy Statements and Planning Policy Guidance Notes.</p> <p>1.9 The Draft NPPF has a more positive approach to growth, with the Rt Hon Greg Clark MP, Minister for Planning, stating in his foreword that ‘...sustainable development is about positive growth – making economic, environmental and social progress for this and future generations’. This positive approach is continued throughout the whole draft document.</p> <p>1.10 The Draft NPPF also reintroduces the concept of ‘a presumption in favour of sustainable development’ as opposed to the maxim of recent years which has been ‘development in accordance with the development plan unless material considerations indicate otherwise’. Whilst these two strategies go hand in hand in terms of aiming to achieve sustainable development there is a clear shift in emphasis in the Draft NPPF to a more positive and proactive planning system.</p> <p>1.11 Advice issued by The Planning Inspectorate states that</p>	

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			<p>'It is capable of being a material consideration, although the weight to be given to it will be a matter for the decision maker in each particular case'.</p> <p>1.12 Firstly, this therefore significantly strengthens the case for not only drafting positive Visions, objectives and policies but also for a positive interpretation of these Visions, objectives and policies. Consequently, the representations made in relation to the Preferred Approach Core Strategy in July 2010 carry extra resonance.</p> <p>1.13 Secondly, it is concerning that the Draft National Planning Policy Framework is not mentioned once in the Further Consultation document. In addition, there are no indications of the more positive emphasis on development contained in the Draft NPPF being taken forward into the Further Consultation. Therefore it is not evident that this important document has been considered appropriately in this Further Consultation.</p>	
Mr Pete Sulley, Barton Willmore on behalf of Central Land Holdings	CSFC/808	Observations	<p>Conclusion</p> <p>Barton Willmore has made representations on previous publications of the East Riding Core Strategy in relation to Central Land Holdings' land interests within East Riding, namely those at the following sites in relation to Beverley:</p> <ul style="list-style-type: none"> • Land to the west of St Martin's and Queensgate Cemeteries and Beverley <p>Grammar School, Beverley; and</p> <ul style="list-style-type: none"> • Land to the south of Figham Link Road, Beverley. 	<p>Comments noted.</p> <p>Individual sites are considered through the Allocations Development.</p> <p>As this response is a summary of the responses made by the consultee, please see their specific responses in the other sections of the report for the officer comments.</p>

Consultee/Agent	ID	Nature Of Response:	Response	Officer Comments
			<p>Central Land Holdings still has some concerns about the Further Consultation document. In relation to Question 1, it is not considered that the Place Statement in relation to Beverley is as positively worded as it should be in accordance with more positively worded national guidance and the Yorkshire and Humber Plan: Regional Spatial Strategy to 2026 (RSS).</p> <p>This is further exacerbated by the fact that the Draft National Planning Policy Framework (Draft NPPF) is more positive and proactive towards growth and development than current guidance.</p> <p>Consequently, there is a concern that the place statement will not be applied in accordance with the positive theme of forthcoming Government advice, which is a step change from previous guidance, and as such reducing the prospect of East Riding achieving its Vision and Objectives as set out in its Core Strategy and in Our East Riding and the Business Plan.</p> <p>In relation to Question 4, there is a concern that there is an over reliance on short term migration patterns in establishing requisite housing numbers, and therefore the required housing numbers are too low. There is insufficient flexibility in the wording of Policy SS4 to allow for greenfield extensions, which is the only way to accommodate the required dwellings over the Plan period and there is concern about the reduction in the percentage requirement of housing provision being directed to the</p>	

Consultee/Agent	ID	Nature Of Response:	Response	Officer Comments
			<p>Principal Towns, 43.5% as opposed to the 45% as set out in the Preferred Approach Core Strategy.</p> <p>In relation to Question 6, Central Land Holdings has significant concerns about Revised Policy HBHM2 in that the evidence base has been completely misinterpreted and misapplied in the revised policy. This will not lead to additional affordable housing coming forward to address the identified shortfall but will discourage developers from undertaking any form of development as the suggested affordable housing site size thresholds and percentage provision, together with the underestimation of 'other' costs, will make schemes unviable.</p> <p>Central Land Holdings also has some concerns in relation to Revised Policy SHC4, in relation to the provision of Open Space. Firstly, it is considered that there is insufficient flexibility factored in to the policy. Secondly, the recommendations in the Open Space Review 2010 evidence base clearly state that minimum standards for certain open space typologies should be imposed where practicable and this caveat has not been taken forward into the policy for those typologies.</p> <p>Finally, the policy states that 'Residential development that increases demand for open space will be required to address this demand in line with the standards of provision set out in Table 4'. However, the Open Space Review states that some residential development, such as dwellings with less than 2 bedrooms or sheltered accommodation, do not require additional open space, and the policy should be revised to clarify this.</p> <p>As currently drafted Revised Policy SHC4 is therefore</p>	

Consultee/Agent	ID	Nature Of Response:	Response	Officer Comments
			<p>contrary to East Riding's own evidence base on the topic.</p> <p>As a result, the Core Strategy needs to be revised in a number of areas, substantially and fundamentally in relation to affordable housing and housing numbers, in order for the document to be found sound.</p>	
<p>Mr Peter Hall, Indigo Planning on behalf of Flemingate Consortium, CP Group/Wykeland Group/Quintain Estates and Development PLC</p>	<p>CSFC/811</p>	<p>Object</p>	<p>Summary</p> <p>Our clients are supportive of the objective set out in the Place Statement to strengthen Beverley's role as a thriving and prosperous town.</p> <p>It is considered that the key role that the redevelopment of the Flemingate site will play in the delivery of this objective should be more strongly emphasised.</p> <p>We also recommend that, in order to strengthen the wider employment role of the town and meet the identified requirements, it is essential to safeguard existing key employment sites for the development of B Class uses.</p>	<p>Comment noted. The place statement has been amended to reflect this comment.</p>
<p>Mr Pete Sulley, Barton Willmore on behalf of Central Land Holdings</p>	<p>CSFC/812</p>	<p>Object</p>	<p>1.0 INTRODUCTION</p> <p>1.1 These representations have been prepared by Barton Willmore on behalf of Central Land Holdings Limited, who has a number of interests within East Riding at Goole, Anlaby, Beverley and North Kingswood (south of Wawne).</p> <p>1.2 These representations are in relation to the 'East Riding Local Development Framework – Core Strategy Further Consultation' (October 2011) (hereafter referred to as the 'Further Consultation'). The aim of this report is to assist the Council in formulating their Local Development Framework, having particular regard to the</p>	<p>Comments noted.</p> <p>Individual sites are considered through the Allocations Document.</p> <p>The plan has been prepared to be in conformity with the final version of the National Planning Policy Framework (NPPF).</p>

Consultee/Agent	ID	Nature Of Response:	Response	Officer Comments
			<p>situation at Goole and mixed use/ residential the below site:</p> <ul style="list-style-type: none"> • Land at Rawcliffe Road, Goole. <p>1.3 This site is attached at Appendix 1. The Site is contained within the Allocations Development Plan Document – Potential Sites Consultation that was subject to public consultation in 2010 and the Strategic Housing Land Availability Assessment (SHLAA), which is partly derived from interested parties submitting Land Bids. The site therefore has several reference numbers and these are set out below for completeness.</p> <p>Site Land at Rawcliffe Road, Goole</p> <p>SHLAA ID Reference Goole 2</p> <p>Site Allocations DPD Reference</p> <p>Land Bid Reference GOOI 1040</p> <p>1.4 Central Land Holdings wholly owns and controls the site. The site can be developed as a</p> <p>stand alone site or together with the adjacent site to the east (SHLAA ID Goole 3, Site</p> <p>Allocations DPD Reference GOO2).</p> <p>1.5 Barton Willmore has previously made representations on the ‘Core Strategy – Issues and Options’ document in June 2008, the ‘Preferred Approach Core Strategy’ in July</p>	

Consultee/Agent	ID	Nature Of Response:	Response	Officer Comments
			<p>2010 and the Site Allocations DPD in July 2010.</p> <p>1.6 The responses that East Riding received to the Preferred Approach Core Strategy identified the need to consider some important amendments to certain policies; these are contained in the Further Consultation. These representations are a response to those changes and questions addressed in the Further Consultation document.</p> <p>1.8 Where Barton Willmore has made comments in previous Core Strategy consultation documents that have not resulted in subsequent revisions in this Further Consultation then our original representations still prevail, although they have largely not been repeated in this document for reasons of brevity.</p> <p>Draft National Planning Policy Framework</p> <p>1.9 However, since the Preferred Approach Core Strategy consultation period between May and July 2010, the Government has published the Draft National Planning Policy Framework (NPPF). Once adopted this will supersede all Planning Policy Statements and Planning Policy Guidance Notes.</p> <p>1.10 The Draft NPPF has a more positive approach to growth, with the Rt Hon Greg Clark MP, Minister for Planning, stating in his foreword that ‘...sustainable development is about positive growth – making economic, environmental and social progress for this and future generations’. This positive approach is continued throughout the whole draft document.</p>	

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			<p>1.11 The Draft NPPF also reintroduces the concept of ‘a presumption in favour of sustainable development’ as opposed to the maxim of recent years which has been ‘development in accordance with the development plan unless material considerations indicate otherwise’. Whilst these two strategies go hand in hand in terms of aiming to achieve sustainable development there is a clear shift in emphasis in the Draft NPPF to a more positive and proactive planning system.</p> <p>1.12 Advice issued by The Planning Inspectorate states that ‘It is capable of being a material consideration, although the weight to be given to it will be a matter for the decision maker in each particular case’.</p> <p>1.13 Firstly, this therefore significantly strengthens the case for not only drafting positive Visions, objectives and policies but also for a positive interpretation of these Visions, objectives and policies. Consequently, the representations made in relation to the Preferred Approach Core Strategy in July 2010 carry extra resonance.</p> <p>1.14 Secondly, it is concerning that the Draft National Planning Policy Framework is not mentioned once in the Further Consultation document. In addition, there are no indications of the more positive emphasis on development contained in the Draft NPPF being taken forward into the Further Consultation. Therefore it is not evident that this important document has been considered appropriately in this Further Consultation.</p> <p>6.1 Barton Willmore has made representations on previous publications of the East Riding Core Strategy in</p>	

Consultee/Agent	ID	Nature Of Response:	Response	Officer Comments
			<p>relation to Central Land Holdings' land interests within East Riding, namely those at the following site in relation to Goole:</p> <ul style="list-style-type: none"> • Land at Rawcliffe Road, Goole. <p>6.2 This site can be developed as a stand alone site or as part of a comprehensive scheme together with the adjacent site to the east, as identified in the Goole Renaissance Plan, which will assist in delivering the Vision, Objectives and Goals set out in the Renaissance Plan for this area, which has been labelled the West Goole Community.</p> <p>6.3 Central Land Holdings still has some concerns about the Further Consultation document.</p> <p>6.13 As a result, the Core Strategy needs to be revised in a number of areas, substantially and fundamentally in relation to affordable housing and housing numbers, in order for the document to be found sound.</p>	
Mr Pete Sulley, Barton Willmore on behalf of Trustees of the Needler Settlement	CSFC/820	Object	<p>6.1 Barton Willmore has made representations on previous publications of the East Riding Core Strategy in relation to The Trustees' land interests within Beverley, namely:</p> <ul style="list-style-type: none"> • Land to the south of Beverley. <p>6.2 The Trustees still have some concerns about the Further Consultation document. In relation to Question 1, it is not considered that the Place Statement in relation to Beverley is as positively worded as it should be in accordance with more positively worded national guidance</p>	<p>Comments noted.</p> <p>Individual sites are considered through the Allocations Development.</p> <p>As this response is a summary of the responses made by the consultee, please see their specific responses in the other sections of the report for the officer comments.</p>

Consultee/Agent	ID	Nature Of Response:	Response	Officer Comments
			<p>and the Yorkshire and Humber Plan: Regional Spatial Strategy to 2026 (RSS).</p> <p>6.3 This is further exacerbated by the fact that the Draft National Planning Policy Framework (Draft NPPF) is more positive and proactive towards growth and development than current guidance.</p> <p>6.4 Consequently, there is a concern that the place statement will not be applied in accordance with the positive theme of forthcoming Government advice, which is a step change from previous guidance, and as such reducing the prospect of East Riding achieving its Vision and Objectives as set out in its Core Strategy and in Our East Riding and the Business Plan.</p> <p>6.5 In relation to Question 4, there is a concern that there is an over reliance on short term migration patterns in establishing requisite housing numbers, and therefore the required housing numbers are too low. There is insufficient flexibility in the wording of Policy SS4 to allow for greenfield extensions, which is the only way to accommodate the required dwellings over the Plan period and there is concern about the reduction in the percentage requirement of housing provision being directed to the Principal Towns, 43.5% as opposed to the 45% as set out in the Preferred Approach Core Strategy.</p> <p>6.6 In relation to Question 5, The Trustees have general support for the increase in land allocated for employment use. However, this does not appear to be based on any empirical evidence and is more than is suggested in the Employment Land Review.</p>	<p>Please note that the NPPF re-affirms the legal position that planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise (paragraph 11 of the NPPF).</p>

Consultee/Agent	ID	Nature Of Response:	Response	Officer Comments
			<p>Whilst the Council recognises this, the policy should have sufficient flexibility factored in so that should employment use on land allocated for such purposes not be forthcoming then the allocation will not result in an unnecessary barrier preventing alternative uses being considered. This is line with paragraph 75 of the Draft NPPF.</p> <p>6.7 In relation to Question 6, The Trustees have significant concerns about Revised Policy HBHM2 in that the evidence base has been completely misinterpreted and misapplied in the revised policy. This will not lead to additional affordable housing coming forward to address the identified shortfall but will discourage developers from undertaking any</p> <p>form of development as the suggested affordable housing site size thresholds and percentage provision, together with the underestimation of 'other' costs, will make schemes unviable.</p> <p>6.8 The Trustees also have some concerns in relation to Revised Policy SHC4, in relation to the provision of Open Space. Firstly, it is considered that there is insufficient flexibility factored in to the policy. Secondly, the recommendations in the Open Space Review 2010 evidence base clearly state that minimum standards for certain open space typologies should be imposed [where practicable] (<i>Italic</i>) and this caveat has not been taken forward into the policy for those typologies.</p> <p>6.9 Finally, the policy states that ['Residential development that increases demand for open space will be required to address this demand in line with the standards of provision</p>	

Consultee/Agent	ID	Nature Of Response:	Response	Officer Comments
			<p>set out in Table 4'.] (Italic) However, the Open Space Review states that some residential evelopment, such as dwellings with less than 2 bedrooms or sheltered accommodation, do not require additional open space, and the policy should be revised to clarify this.</p> <p>6.10 As currently drafted Revised Policy SHC4 is therefore contrary to East Riding's own evidence base on the topic.</p> <p>6.11 As a result, the Core Strategy needs to be revised in a number of areas, substantially and fundamentally in relation to affordable housing and housing numbers, in order for the document to be found sound.</p>	
<p>Mr Pete Sulley, Barton Willmore on behalf of The Kingswood Parks Development Company Ltd</p>	<p>CSFC/838</p>	<p>Object</p>	<p>6.0 CONCLUSION</p> <p>6.1 Barton Willmore has made representations on previous publications of the East Riding Core Strategy in relation to The Kingswood Parks Development Company's (KPDC) land interests within East Riding, namely the site at North Kingswood.</p> <p>6.2 KPDC still has some concerns that edge of Hull sites have not been shown appropriate regard where they lie adjacent to an area of Hull that performs the same function as the Major Haltemprice Settlements, namely Kingswood in this instance. It is acknowledged that development at North Kingswood needs to wait until development at</p> <p>Kingswood reaches the administrative boundary and as such development of North Kingswood is unlikely to take place until towards the end of the Plan period.</p> <p>6.3 Further, design matters should be carefully considered</p>	<p>Comments noted.</p> <p>Individual sites are considered through the Allocations Development.</p> <p>As this response is a summary of the responses made by the consultee, please see their specific responses in the other sections of the report for the officer comments.</p>

Consultee/Agent	ID	Nature Of Response:	Response	Officer Comments
			<p>so that development at North Kingswood does not result in coalescence with Wawne.</p> <p>6.4 However, due regard must be shown to the role that North Kingswood can play as an extension to Kingswood and assisting the delivery of the requisite housing numbers.</p> <p>6.5 In relation to Question 4, there is a concern that there is an over reliance on short term migration patterns in establishing requisite housing numbers, and therefore the required housing numbers are too low. There is insufficient flexibility in the wording of Policy SS4 to allow for greenfield extensions, which is the only way to accommodate the required number of dwellings over the Plan period.</p> <p>6.6 In relation to Question 6, KPDC has significant concerns about Revised Policy HBHM2 in that the evidence base has been completely misinterpreted and misapplied in the revised policy. This will not lead to additional affordable housing coming forward to address the identified shortfall but will discourage developers from undertaking any form of development as the suggested affordable housing site size thresholds and percentage provision, together with the underestimation of 'other' costs, will make schemes unviable.</p> <p>6.7 KPDC also has some concerns in relation to Revised Policy SHC4, in relation to the provision of Open Space. Firstly, it is considered that there is insufficient flexibility factored in to the policy. Secondly, the recommendations in the Open Space Review 2010 evidence base clearly state that minimum standards for certain open space typologies should be imposed where practicable and this caveat has</p>	

Consultee/Agent	ID	Nature Of Response:	Response	Officer Comments
			<p>not been taken forward into the policy for those typologies.</p> <p>6.8 Finally, the policy states that 'Residential development that increases demand for open space will be required to address this demand in line with the standards of provision set out in Table 4'. However, the Open Space Review states that some residential development, such as dwellings with less than 2 bedrooms or sheltered accommodation, do not require additional open space, and the policy should be revised to clarify this.</p> <p>6.9 As currently drafted Revised Policy SHC4 is therefore contrary to East Riding's own evidence base on the topic.</p> <p>6.10 As a result, the Core Strategy needs to be revised in a number of areas, substantially and fundamentally in relation to affordable housing and housing numbers, in order for the document to be found sound.</p>	
Mr Dan Mitchell, Barton Willmore on behalf of Wykeland Group Limited	CSFC/848	Other	<p>1.1 Barton Willmore is instructed by Wykeland Group Limited (hereinafter referred to as the "client") to review and submit representations to the East Riding Core Strategy Further Changes Consultations October 2011 (the "Core Strategy").</p> <p>1.2 Wykeland Group Limited is a privately owned commercial property development and investment company, based in Hull. It is active across the Humberside area and has developed such sites as Europarc Grimsby, Ropery Park Hull, Kingston Business Park and Wykeland House Hull.</p> <p>1.3 In East Riding, Wykeland Group Limited is successfully developing some of the largest employment sites in East</p>	Comments noted.

Consultee/Agent	ID	Nature Of Response:	Response	Officer Comments
			<p>Riding including Bridgehead, the only allocated strategic employment site in East Riding, and Melton West business park.</p> <p>1.4 Our client therefore has extensive knowledge of the local employment market and delivery of employment land in East Riding and the regional City of Kingston-upon-Hull. It is within this context that our client wishes to submit representations to the Core Strategy. As further evidence, we enclose with these representations three schedules which set out the current position on the take up and progress of employment land on sites owned by Wykeland Group Ltd. These schedules relate to Bridgehead, where planning permission was granted in August 2011, and for Melton West Phase 1 and Melton West Phase 2 (phase 2 was granted consent in October 2011) and are included in the appendices to this statement. The schedules demonstrate that despite the economic recession, demand from occupiers for sites that are attractive in respect of their location, is still buoyant.</p>	

Consultee/Agent	ID	Nature Of Response:	Response	Officer Comments
Mr Zulficar Ali, Environment Agency	CSFC/862 CSFC/839	Observations	<p>We wish to see our previous comments made to the Core Strategy Preferred Approach dated 12 July 2010 reflected in your publication document. Our comments to this Further Consultation Report are specifically related to the revised housing figures.</p> <p>We would like to take this opportunity to remind East Riding of Yorkshire Council of their obligation under the Water Framework Directive to ensure any new developments assess the implications of their proposals on water quality, including mitigation of negative impacts where necessary. Proposals are encouraged to improve water quality and physical habitat, particularly in areas where watercourses are below expected standards. Where a proposal causes physical modifications to any waterbody or the discharge of polluted water into a waterbody an assessment will need to be carried out to ensure compliance with the EU Water Framework Directive objective to prevent or mitigate against deterioration of that waterbody.</p> <p>Annex C of the Humber River Basin Management Plan identifies pressures and actions where local authorities have a role. These include the promotion of sustainable urban drainage systems, tackling drainage issues in areas without mains drainage (village drains, septic tanks, avoiding proliferation of private sewage treatment etc), street and drain management, promoting ecological awareness, control of non-native invasive species and habitat improvements in river corridors.</p> <p>The impact of new development generally reduces the permeability of a site and therefore increases water run-off which can create problems such as increased flood risk in the area and reduced water quality. Such impacts need to be considered and techniques introduced to achieve a satisfactory outcome. Sustainable drainage systems (SuDS) comprise a variety of methods to manage surface water, reduce the risk of flooding and improve water quality by reducing the need for combined sewer overflows or</p>	Comments noted. The comments to the Preferred Approach Core Strategy and Core Strategy Further Consultation have been reflected on in preparing the Draft Strategy Document.

Consultee/Agent	ID	Nature Of Response:	Response	Officer Comments
Mr Zulficar Ali, Environment Agency	CSFC/863	Observations	<p>We broadly support the further consultation report. We welcome the many changes the council has made and are particularly encouraged by the acknowledgement of the flood risk concerns and your commitment to tackle these issues. This has been particularly highlighted in you stance with regard to places like Goole, Rawcliffe and Hedon. We are yet to see the full revised Core Strategy but would welcome the opportunity to meet with you to discuss our previous concerns and current comments and make sure these have been met fully prior to the submission stage. Our comments to this consultation report have been based on the revised housing figures.</p> <p>The key issues raised in the opening of this response centre around lack of clarity as to how the housing growth figures for the settlement network have been arrived at. In particular the percentage growth proposed for the Primary and Secondary Rural Service Centres. It is important for us to understand how the approach to the settlement network has been derived. We look forward to meeting you to discuss any of the concerns raised in this response with you further.</p>	<p>Comments noted. A meeting between the Environment Agency and the council took place to discuss the approach for the Draft Strategy Document.</p> <p>In response to the consultation comments, the Draft Strategy Document merges the categories of Secondary Rural Service Centres and Hinterland Villages to form Primary Villages. This provides greater clarity on the scale of development anticipated in the Primary Villages (formerly Secondary Rural Service Centres and Hinterland Villages). Allocations will be made in Primary Villages.</p>
Gemma Edwardson, Edwardson Associates on behalf of Client Unknown,	CSFC/869	Object	<p>East Riding of Yorkshire Local Development Framework – Policy Comments.</p> <p>Static Caravan and Residential Caravan Parks : a proposed solution to a policy vacuum/weakness</p> <p>I. Housing Strategy</p> <p>The ERYC proposed Core Strategy presents development policies within Chapter 7 – A Healthy and Balanced Housing Market.</p>	<p>Comments noted. New homes will need to be delivered sustainably in line with the overall approach. Park home development would need to comply with the policies within the Plan. This should not be an opportunity to develop in inappropriate locations.</p>

Consultee/Agent	ID	Nature Of Response:	Response	Officer Comments
			<p>Paragraph 7.4 recognises the ‘need to provide an increase in housing options for a range of other vulnerable groups in the East Riding including providing more suitable housing for first time buyers and providing new and refurbished Gypsy and Travellers sites’.</p> <p>2. Housing Aims</p> <p>The three key objectives and priorities as set out in the Housing Strategy 2008 are:</p> <ul style="list-style-type: none"> • Meeting the housing need and delivering more affordable housing; • Creating quality homes and places and; • Meeting the diverse needs of our community. <p>These aims are supported by the East Riding’s objective to provide a range and mix of housing in terms of types, sizes and tenure.</p> <p>3. The position in relation to Mobile Home and Residential Caravan Parks</p> <p>a) ERYC is the largest rural authority in the country.</p> <p>b) Site Licensing Team records show that there are an estimated 14972 licensed static caravan pitches and some 3216 touring pitches in the area.</p> <p>c) These figures are almost certainly conservative - as not all pitches approved through the planning system will necessarily have been subjected to a Site License</p>	

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			<p>application.</p> <p>d) All the static caravan pitches in our area are approved for holiday use only, albeit in the last 4 or 5 years many will have an approved use for 12 months.</p> <p>e) At present, there is not a single approved residential caravan park within the East Riding of Yorkshire Council jurisdiction.</p> <p>f) This is a weakness not a strength and denies people a bona fide opportunity to take up occupation in accommodation of this type which these days is not only in demand, but is relatively affordable and constructed to a high standard attracting the appropriate BS Kite mark for a residential park home.</p> <p>Furthermore, it has come to attention that the Council appears to have increasing concerns in relation to alleged or suspected unauthorised residential occupancy of static caravans within the East Riding.</p> <p>There is clearly a demand for residential park homes within the area. The council is in the unfortunate position that should they be faced with a problem - or conversely a bona fide enquiry from a retiree or young person for example - there is not a single approved residential park to which the parties involved could be legitimately directed.</p> <p>This means that for example in a breach situation the parties involved could demand that the council re-house them in council houses, where available stock is virtually zero.</p>	

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			<p>As detailed below; other Local Authorities are reacting to this demand by making provision for a policy within the Local Development Framework to accommodate residential use within appropriate sites. Many have also had approved residential parks for years.</p> <p>g) The obvious solution is to make provision, attract the proper council tax revenue, compete more favourably with other local authorities, and use this as a powerful tool to increase local revenues and neutralise abuse.</p> <p>h) We propose that this should be incorporated within the emerging LDF.</p> <p>4. National Planning Policy</p> <p>Planning Policy Statement 3 (PPS3): Housing states that the Government’s key housing policy goal is:</p> <p>“ to ensure that everyone has the opportunity of living in a decent home, which they can afford, in a community where they want to live.”</p> <p>The Government is seeking:</p> <ul style="list-style-type: none"> • To achieve a wide choice of high quality homes, both affordable and market housing, to address the requirements of the community. • To widen opportunities for home ownership and ensure high quality housing for those who cannot afford market housing and in particular those who are vulnerable or in need. 	

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			<ul style="list-style-type: none"> • To improve affordability across the housing market, including by increasing the supply of housing. • To create sustainable, inclusive, mixed communities in all areas, both urban and rural. <p>The objectives above should provide the context for planning for housing through development plans and should be incorporated into the LDF. The LDF should also aim to deliver ‘a mix of housing, both market and affordable, particularly in terms of tenure and price, to support a wide variety of households in all areas, both urban and rural’.</p> <p>The provision of residential park homes in the East Riding could assist in meeting these objectives by adding to the available mix of housing in the County which are relatively affordable.</p> <p>The variation in planning conditions on existing caravan parks in the correct locations could facilitate a flexible and responsive supply of land for housing that is previously developed and has the benefit of the necessary infrastructure which will ensure an efficient use of the land.</p> <p>This is a positive and more proactive approach, informed by evidence of demand, and meets the target to deliver rural affordable housing. This might be interpreted as a variation of the Rural Exception Site Policy.</p> <p>Existing smaller caravan sites could potentially be made available almost immediately to provide a suitable and deliverable source of more affordable rural housing, which is urgently required.</p>	

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			<p>5. Local Authorities – Examples of Policy Approach to Mobile Home and Residential Caravan Parks</p> <p>Although at present, there are no known approved residential caravan parks within the East Riding of Yorkshire Council, other Local Planning Authorities have accepted the principle and at the same time acknowledged the following:</p> <p>“...that caravans and mobile homes play an important role in providing low-cost accommodation for local people, and are an alternative form of affordable housing provisions. These properties are particularly popular with people over the age of 50 years” East Cambridgeshire Core Strategy, page 65.</p> <p>East Cambridgeshire have also safeguarded mobile home and residential caravan parks through the policy which states that “proposals involving the loss of all or part of key identified sites will be resisted, unless it can be demonstrated that the operation is no longer viable and there is no business demand”.</p> <p>Residential caravans offer a genuine opportunity for affordable market housing in rural areas – where otherwise, house prices might be beyond the reach of the diverse communities.</p> <p>Low –cost accommodation can be provided in the form of residential caravan sites which will contribute to the required and intended increase in housing options and in particular for the aging population.</p>	

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			<p>The Scottish Government commissioned a report in 2007 to review: 'Residential; Mobile Homes in Scotland'. The report revealed that;</p> <p>“The 2001 Census showed that caravans, mobile homes and other temporary structures were playing a particular role in the housing system in terms of providing accommodation for older people, and also for people with a long term limiting illness.</p> <p>In addition, Horsham District Local Development Framework has acknowledged Park Homes / Residential Caravans within their Policy DC20. This Council has acknowledged the importance of providing residential accommodation in the form of park homes or residential caravan sites.</p> <p>The policy document also states that this type of accommodation plays a role in providing a form of low cost housing and a wider housing opportunity for residents within the District.</p> <p>Other Local Planning Authorities are recognising the importance of residential caravans and park homes as a source of housing. This particular type of housing is desirable to the older generations and those who are nearing or at retirement age.</p> <p>East Riding stress the need to accommodate an ageing population within the Local Authority area and it is considered that a specific policy within the Core Strategy could both provide this facility within the District whilst judging and deciding appropriate sites that meet a reasonable set of criteria. These should balance</p>	

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			<p>environmental, social and economic needs and will contribute to the housing needs of the area - and in particular provide a mix of housing types to older people and possibly those requiring starter homes.</p> <p>If such a policy were to be adopted, the Council would be able to introduce enhanced collection of Council Tax to ensure that those genuinely living in the area properly contribute to the services provided by the Council. This will inevitably benefit the local economy and provide financial support to services otherwise used by those on holiday.</p> <p>The East Riding's proposed Core Strategy states that 'population projections show that the proportion of over 60 year olds is set to rise over the plan period. Housing waiting lists and the types of accommodation being built show that there is a preference for 2 bed accommodation'...'The allocations DPD should allocate land to provide development for older people'.</p> <p>Summary</p> <p>The provision of a small number of approved residential park home sites in the East Riding would solve a number of the issues highlighted above, as well as offering a more affordable type and tenure of housing to those who otherwise would not be able to afford to purchase alternate market housing.</p> <p>Supply lead-in times are almost immediate, and therefore so is the housing solution for some members of society. Proper screening, planting and sensitive layouts can produce an attractive living environment with a very short</p>	

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			<p>lead time from commencement to the provision of a heated, well-insulated and cost-effective home.</p> <p>The allocation of some selected existing holiday parks for residential use would provide a quick, sensible and simple solution towards addressing the housing and affordability issues experienced in the area. If considered fully, such an initiative could have minimal impact and would not unacceptably affect tourism interests.</p> <p>Furthermore it would drive up Council Tax revenues, which the government are considering leaving with local authorities in future, give more freedom of choice and blow away any excuses that the area did not officially make available this type of housing provision.</p>	
Mr Chris Calvert, Pegasus Planning Group	CSFC/958	Observations	<p>Whilst not specifically considered in the Further Consultation document, new draft national planning policy has been released since the Preferred Options Core Strategy which has implications for emerging LDDs.</p> <p>In regard to renewable energy, the draft NPPF states that local planning authorities should design policies to maximise renewable and low-carbon energy sources while ensuring that adverse impacts are addressed satisfactorily. To secure renewable and low-carbon sources authorities should consider identifying suitable areas for such sources. We would encourage East Riding of Yorkshire Council to review Policy HQE7 on this basis.</p>	Comments noted. The energy policy in the Draft Strategy Document (EC6) will not identify specific areas for renewable energy development. Instead applications will be assessed on a case by case basis, taking into account the factors outlined in the policy.
Mr Paul Forshaw, BNP Paribas Real Estate on behalf of Associated British Ports	CSFC/963	Observations	We have been instructed by our client, Associated British Ports (ABP), to submit representations to the above document in respect of the Company's landholdings at Hull Road, Hedon.	<p>Comments noted. Individual sites are considered through the Allocations Document.</p> <p>As this response is a summary of the</p>

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			<p>Background</p> <p>Site Description</p> <p>ABP's landholding at Hull Road, Hedon (hereafter referred to as "the site") is located on the western fringe of the settlement of Hedon. It is located to the south of the B1362 Hull Road and to the east of the A1033. To the north of the site is a petrol filling station, a supermarket and the St Augustine Business Park. To the east is an existing residential development. To the west of the site is the A1033, with the area known as "Hedon Haven" beyond. A site plan is enclosed for you information.</p> <p>The site is approximately 7.51 ha in area, and comprises open greenfield land. It is allocated for employment uses falling within the B1, B2 and B8 Use Classes in the Holderness Local Plan. The site was previously included in the East Riding of Yorkshire Strategic Housing Land Availability Assessment (SHLAA) as a suitable housing site. However, the site has now been removed from the SHLAA due to the Council's concerns over surface water drainage in Hedon.</p> <p>ABP considers that the site is suitable for development and in particular suitable for mixed-use development including residential properties and a supermarket.</p> <p>Previous Representations</p> <p>ABP previously submitted representations to the East Riding of Yorkshire ("ERoY") Local Development Framework (LDF) Core Strategy Issues and Options in June 2008 and to the Core Strategy Preferred Approach</p>	<p>responses made by the consultee, please see their specific responses in the other sections of the report for the officer comments.</p>

Consultee/Agent	ID	Nature Of Response:	Response	Officer Comments
			<p>and Site Allocation Potential Sites in July 2010 in respect of the Hedon site and its other landholdings in the ERoY, including the Land at Paull Road, Saltend (Hedon Haven) and the Port of Goole.</p> <p>In respect of the Hedon site, these representations requested that Hedon be designated as a Principal Town due to its links with the City of Hull. Representations also objected to the proposed allocation of the Hedon site for a mixed-use development including employment and residential development. This was on the basis that ABP has not received any interest for employment development on the site since its allocation for employment development in the Holderness Local Plan in 1999. It was therefore requested that the site was allocated for housing development.</p> <p>ABP has also submitted representations to the Core Strategy Further Consultation in respect of the Land at Paull Road, Saltend (Hedon Haven) on 14 December 2011. These representations promoted the development of employment uses related to the port and renewable / low carbon energy sectors on the site, following its inclusion within the Humber Enterprise Zone.</p>	

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Mr Paul Forshaw, BNP Paribas Real Estate on behalf of Centrica Storage Limited (CSL)	CSFC/970 CSFC/977	Observation	<p>We have been instructed by our client, Centrica Storage Limited (CSL), to submit representations to the above document, in respect of the Company's following properties:</p> <ul style="list-style-type: none"> ■ Easington Terminal ■ Caythorpe Gas Storage Facility ■ Unit 1 St. Augustine's Park in Hedon. <p>Further details of these sites can be found below and site location plans are attached (file attached) for your information.</p> <p>Background</p> <p>Centrica plc is one of the largest energy companies in the UK, employing 30,000 people worldwide. The company secures and supplies gas and electricity for millions of homes and businesses across the UK.</p> <p>CSL is a wholly owned subsidiary of Centrica plc. The company incorporates activities relating to gas storage and operates the Rough gas storage facility in the southern North Sea and the Easington onshore gas processing terminal in East Yorkshire. In 2008, Centrica acquired the Caythorpe Gas Storage Facility at Bridlington in East Yorkshire.</p> <p>Government policy recognises the challenges that are facing the UK in terms of gas supply, especially in light of the fact that natural gas will remain a large component of the Country's energy mix for the foreseeable future. In particular, a Ministerial Statement by the Secretary of State for Trade and Industry (published in May 2006) titled "Energy Statement of Need for Additional Gas Supply" is explicit in stating that there is a clear national need for</p>	Comments noted. Policy EC6 of the Draft Strategy Document provides this flexibility.

Consultee/Agent	ID	Nature Of Response:	Response	Officer Comments
Mr David Renwick, East Riding Of Yorkshire Council	CSFC/979	Other	The Waterways Partnership Coordinator should be included in any further consultation in relation to the use of Community Infrastructure Levy to ensure waterways are appropriately reflected.	Comments noted
Mr David Renwick, East Riding Of Yorkshire Council	CSFC/994	Observations	<p>The need to provide affordable housing in rural areas to counter the impact of coastal change should be considered to reflect the needs of those facing the loss of property as a result of coastal erosion (e.g. at Ulrome, Atwick and Skipsea). This comment should be cross-referenced into Policy HBHM2 and reflected in the associated Supplementary Planning Document. In addition, the erosion risk facing the Primary Rural Service Centres such as Aldbrough should be considered, as they are cited as being able to support smaller villages and wider development initiatives.</p> <p>Wording - the SMP2 is now adopted, rather than emerging:</p> <p>Since the previous consultation period, the Humber Estuary Coastal Authorities Group (HECAG)'s Flamborough Head to Gibraltar Point Shoreline Management Plan (SMP2) has now been formally adopted by the Council and its partners.</p> <p>It would be appropriate to refer to coastal defences in the place statements of each major coastal town - Bridlington, Hornsea and Withernsea - rather than simply the statement for Withernsea.</p>	Comments noted
Mr David Renwick, East Riding Of Yorkshire Council	CSFC/995	Object	We feel strongly that the Core Strategy needs to include the promotion of rollback and the establishment of a coastal change management area (CCMA) based on the SMP2, the Council coastal monitoring programme,	Comments noted. A roll back approach and CCMA is included within Policy ENV6 of the Draft Strategy Document.

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			emerging outcomes of the East Riding Coastal Change Pathfinder and the National Coastal Erosion Risk Mapping project.	
Mr David Renwick, East Riding Of Yorkshire Council	CSFC/1005	Observations	<p>Preferred Approach Core Strategy (May 2010)</p> <p>Section 1.4- Supplementary Planning Documents</p> <p>In our comments on the LDF Core Strategy in May 2010, we proposed developing a Coastal Change Management Supplementary Planning Document. It is now anticipated that a corporate Coastal Change Policy will be produced in 2012/2013 to enshrine the necessary policy and corporate mechanisms required to manage coastal change issues, which will include a single policy for residential and commercial roll back. This will form part of a wider corporate Coastal Management Framework. An adopted policy which complements the LDF will have a wider scope than a SPD with a specific development focus. Work will be ongoing to develop national level guidance on how the planning system can be used to support coastal change adaptation and involvement from the LDF team will be essential alongside that of the Sustainable Development Team.</p> <p>Section 9.102 (plus 9.119)</p> <p>Coastal Change Management Areas (CCMAs) should be identified in LDFs, informed by areas identified at risk in the SMP2 and the Council's in-house coastal erosion monitoring data.</p> <p>Section 9.103</p> <p>We agree that the principle of Rollback must be</p>	Comments noted. A roll back approach and CCMA is included within Policy ENV6 of the Draft Strategy Document.

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			<p>established in the LDF Core Strategy. It should be clear from the LDF Core Strategy that detailed Rollback guidance will form part of the proposed Coastal Change Policy; there will be a single, integrated Rollback policy in place of the existing Rollback policies.</p> <p>Section 9.123</p> <p>This section should refer to the Council's Coastal Management Framework (to consist of the Coastal Change Policy, the East Riding Coastal Partnership and the coastal evidence based that is linked in part to the SMP2).</p>	
Mr David Renwick, East Riding Of Yorkshire Council	CSFC/1006	Object	<p>With regard to the policies which are not being consulted on again at present, but we may be able to modify, the area based policies e.g. S11 Goole & hinterland has an Environmental Section 1. "In conjunction with neighbouring authorities, continue to support integrated approaches to habitat management safeguarding and enhancing current natural conservation sites and areas of high landscape value, particularly in the Lower Derwent Valley and at Thorne and Hatfield Moors."</p> <p>I recommend that this is amended as follows: after "neighbouring authorities" add 'and other partners' and after "support integrated approaches to" replace "habitat management" with 'landscape scale biodiversity initiatives'.</p>	Comments noted.

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Mr A J Hunt	CSFC/1008 CSFC/1010 CSFC/1011	Observations	<p>I have not filled out the Questionnaire as I need to spend more time thinking about the methods of movement of people and businesses. Communication by all means, electronically, by Road /Rail, Public Transport and Business development across the East Riding is vital if we are to develop the villages as suggested.</p> <p>I can raise a few issues, however, about the village where I live, Cottingham, and therefore I have the following comments</p> <p>2) The recent presentation of a potential large supermarket near the railway station is exactly what the village does not need as it would be a massive danger to what is expressed in item one. However it would be ideal for development as a Light Industrial or Business Park as this would bring money into the village. There is, and would be with the proposed future development, a good cross section of housing and the potential of highly educated and skilled labour that would not need to travel too far to work saving clogged roads and the environment! !!</p> <p>3) Moving onto infrastructure, there are two areas that concern me. The first is the development on the east of the village. Park Lane is a nightmare for traffic as the access to Northgate is a visibility hazard. Somehow this would need to be solved with the development of housing off Park lane as shown on the Structure Plan. The second is drainage, both Foul and Surface. As I understand it, the Foul and Surface drains are combined somewhere in the village. If this is the case they should be separated. It is also evident that the drains are not large enough as it is; with George Street and King, Street flooding at least twice in the last decade. Park lane road drains also can not cope with major storms with backing up into the road occurring regularly in very heavy rain. This sort of infrastructure work I believe is necessary if we are going to develop the village effectively</p> <p>I hope this is of help to you, and if you wish to discuss at any time I am available as I have now retired and would be</p>	<p>Comments noted. Infrastructure provision has been an important component in preparing the Draft Strategy Document.</p> <p>Individual sites are considered through the Allocations Document.</p>

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Mr Matthew Naylor, Yorkshire Water	CSFC/1014	Observations	<p>The importance of Groundwater Source Protection Zones (SPZ) is recognised within the document. We would recommend the inclusion of the following policy to ensure the continued protection of the essential groundwater resource which supplies much of the clean water to the East Riding and Hull:</p> <p>Groundwater Policy</p> <p>Justification</p> <p>The Environment Agency defines Source Protection Zones (SPZs) for groundwater sources such as wells, boreholes and springs used for public drinking water supply. The Zones quantify the risk of contamination from any activities that might cause pollution in the area. The closer the activity, the greater the risk.</p> <p>Groundwater Source Protection Zone (SPZ) 1 is a minimum 50-metre protection area surrounding groundwater sources such as wells, boreholes and springs used for the public drinking water supply, and covers the area where pollution would travel within a 50-day period. SPZ2 covers a 400-day travel period for pollutants and SPZ3 is the total catchment area for a borehole.</p> <p>As part of the planning application process, applicants must satisfy the LPA that the proposed development will not increase the risk of pollution into the aquifer. The relevant submitted supporting information will be assessed during the determination process through consultation with the Environment Agency, Yorkshire Water and the appropriate Internal Drainage Board.</p>	Comments noted. Policy ENV6 and supporting text of the Draft Strategy Document reflects on your comments.

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			<p>Groundwater Source Protection Policy</p> <p>Within Groundwater Source Protection Zones 1 and 2, the following will not be permitted unless adequate safeguards against possible contamination can be agreed:</p> <ul style="list-style-type: none"> i. Construction of any new buildings, construction techniques including foundation design must be agreed before planning permission is granted. ii. Septic tanks, waste water treatment works, storage tanks containing hydrocarbons or any chemicals, or underground storage tanks; iii. Sustainable drainage systems with infiltration to ground iv. Oil Pipelines v. Storm water overflows and below ground attenuation tanks vi. Activities which involve the disposal of liquid waste to land vii. Graveyards <p>An applicant wanting to develop within an SPZ 1 or 2 should consult the relevant parties prior to submission of a planning application.</p>	
Mrs J Gill, Welton Parish Council	CSFC/1017	Observations	<p>We also asked at the meetings for a clarification of "sustainability". Your answer was that there is a spectrum of meaning and we are aware, too, that the Government is having great difficulty in providing a definition in order to support their new policies.</p>	<p>Comments noted. The plan has been prepared to be in conformity with the final version of the National Planning Policy Framework (NPPF). The NPPF provides a definition of</p>

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			<p>There is obviously a need to be clear about these points since there are implications for other aspects of the Core Strategy.</p>	<p>'sustainable development'. Policies S1 and S2 of the Draft Strategy Document seek to ensure all planning decisions promote sustainable development.</p> <p>A Sustainability Appraisal of the Draft Strategy Document has also been prepared.</p>
Mrs J Gill, Welton Parish Council	CSFC/1022	Observations	<p>Housing and Employment Land Provision</p> <p>We do not object to these policies on condition that there is adequate infrastructure - eg schools and utilities - and, in particular, some realistic proposals for dealing with the traffic problems associated with the A63/Welton/Brough interchange. This has been a common theme at recent public meetings. A new road from Skillings Lane, Brough to the A63 Grade Separated Junction at Melton is always requested.</p>	<p>Policy C1 of the Draft Strategy Document ensures that developer contributions will be sought from new development in order to meet the need for new or improved infrastructure and facilities that it generates and to mitigate its impact on the wider environment and the community.</p>
Mrs J Gill, Welton Parish Council	CSFC/1024	Other	<p>General Comments</p> <p>All too frequently we find that the Development Control Section ignores or liberally interprets approved policies which results in inconsistent, ad hoc decisions. We urge you, please, once the policies in the Core Strategy are adopted, to ensure they are properly implemented.</p> <p>Thank you for organizing an informative meeting at Goole, admirably presented by Mr Owen Robinson and for sending follow-up documents.</p>	<p>Comments noted.</p>
Mrs Wendy Leighton.	CSFC/1029	Observations	<p>It should be noted that Willerby Parish Council feel that</p>	<p>Comments noted. The Draft Strategy</p>

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Willerby Parish Council			<p>consideration must be given to the regeneration of Hull.</p> <p>The Parish Council would in no way approve the development of employment of land currently used for farming or land which has been affected by flooding or which creates a natural barrier between Willerby, Cottingham and Hull. We should be grateful for updates on the consultation.</p>	seeks to support the regeneration of Hull.
Ms Libby Woodhouse, Flamborough Parish Council	CSFC/1030	Other	Thank you for giving us extra time to consider the Consultation and this is just to let you know that the Parish Council decided not to respond to the Consultation at this stage.	Comment noted.
Mr David Graham, Nathaniel Lichfield & Partners Ltd on behalf of Mr S Prosser, St Modwen Properties PLC	CSFC/1030	Observations	<p>The comments in this letter are provided on behalf of our client, St Modwen Properties. For context we would explain that our client controls land at Melton Park which is subject to an extant planning permission for major development, part of that site also being allocated for development in the adopted Beverley Local Plan.</p> <p>From a review of the Core Strategy is it clear that in arriving at the strategy therein, the Council has had regard to the availability of land to meet development needs, drawing upon evidence base documents such as the Strategic Housing Land Availability Assessment (SHLAA) and Employment Land Review (ELR). In this regard we would highlight that only recently has our client made formal submissions relating to his entire landholdings at Melton Park. On this basis it is understandable that Melton Park receives limited mention in the document, save for a reference to its potential relationship with proposed new development at Elloughton and Brough. Our client's view is that his land presents a strategic opportunity not only for employment but also for housing and other associated</p>	Comments noted.

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			<p>uses and would ask that this is recognised by the Council and appropriately reflected in the Local Development Framework (LDF) going forward.</p> <p>From an inspection of the current Core Strategy, our client has a concern that the emerging settlement strategy does not adequately recognise the potential role of the Melton Park area as a location to meet strategic development needs, on a sustainable site, free of insurmountable constraints and with essential infrastructure already in place.</p> <p>The remainder of this letter sets out responses to a number of the specific questions raised in the Core Strategy.</p>	
Mr David Graham, Nathaniel Lichfield & Partners Ltd on behalf of Mr S Prosser, St Modwen Properties PLC	CSFC/1037	Observations	<p>We trust that the Council will have due regard to the above comments and requests in considering the need for and benefits of revisions to the current Core Strategy.</p> <p>As you will see from the letter, our view is that our client's land offers an important opportunity for a sustainable development to meet strategic needs on a site which provides confidence over delivery, and which can deliver a range of benefits. We are keen to ensure that the Core Strategy captures this opportunity.</p> <p>If any of the content of the letter is unclear or if officers would like to discuss its content then we would both be delighted to meet up in the New Year alongside our client.</p>	<p>Comments noted</p> <p>Individual sites are considered through the Allocations Document.</p>
Mr Mark Jones, Barton Willmore on behalf of Stuart Evison	CSFC/1043	Observations	<p>Park Farm, Howden (HOW 2)</p> <p>Whilst we appreciate site specific details will be addressed within the Site Allocations Document, we consider it</p>	<p>Comments noted</p> <p>Individual sites will be considered through the Allocations Document.</p>

Consultee/Agent	ID	Nature Of Response:	Response	Officer Comments
			<p>necessary to bring to your attention the above site. Detailed and more specific representations were made in terms of this site as part of the Allocations Potential Sites Consultation which closed on 12 July 2010. The site is now included within the SHLAA as a site for consideration and therefore we understand will be given due consideration in the process of identifying sites through the Site Allocations DPD.</p> <p>The site is located within Howden which is identified as a Local Service Centre. It is therefore in a strategic location, within the settlement hierarchy which is identified for housing development, and which provides a suitable and sustainable location for housing development in the future. Howden is located in a strategically well located accessible location, with access to the M62 junction 37 in close proximity, and with the Howden Railway Station providing public transport links.</p> <p>Our clients therefore consider that Howden is suitable for growth and should be identified to take a larger proportion of residential development in the medium to long term, in response to Question 4.</p> <p>The site at Park Farm is identified within the Core Strategy as HOW2, and sits outside the development limits of Howden as identified within the Boothferry Local Plan Proposals Map. The site is situated to the north of Potential Development site HOW 1 and HOW 3, off Station Road, Howden, which is identified within the Preferred Allocations DPD as Potential Housing sites.</p> <p>A planning application (ref 11/02561/STPLF) was resolved to be approved at committee on 22 September, 2011 for</p>	

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			<p>the development of 650 units at the site at (HO3) at land between Station Road and Selby Road, Howden, which included detailed proposals for a North Howden Relief Road between Station Road (B1228) and Selby Road (A63).</p> <p>Our Clients site is located to the north of HOW 3 and represents an area of agricultural land between the approved residential development site (HOW3) and the new Link Road. It therefore forms a logical urban infill site within the new Relief Road. Being located adjacent to approved residential development to the south and the proposed Relief Road to the north, the site would represent a suitable consolidation of the settlement. The logical boundary of development would be formed by the Relief Road, which would provide a long term defensible boundary to the north of the settlement of Howden.</p> <p>There are no overriding development constraints associated with the site. The approved planning application at HOW 3 includes within the proposals a comprehensive scheme for flood mitigation. Floodplain compensation measures have been approved to carry out mitigation works in the landscape in order that the flood basin is transferred into the HOW 1 site area, resulting in the HOW3 site and HOW 2 site now being considered outside the floodplain. It should also be noted that a significant amount of Howden to the south and east lies within the Environment Agency defined Flood Zone 2 and Flood Zone 3. It is our client's view that sites outside the floodzone should be sequentially preferable to those within the flood zone, which should not be developed. Site references HOW 9, HOW 10 and HOW 11 are located within the floodplain and therefore should be considered</p>	

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			<p>unsuitable for development.</p> <p>Howden is a successful local service centre which provides a significant level of local employment. Our clients consider that the settlement could support further employment. In response to Question 5 on employment distribution, we would object to the provision of B1 uses predominantly in only Haltemprice settlements and Principal towns, and would suggest that local service centres such as Howden would provide an appropriate and sustainable location for B1 development. Our clients also support the allocation of B2 uses across the East Riding. Due to its strategic location Howden is a suitable and sustainable location for employment provision. An existing employment area is located to the north east of the town and a potential long term opportunity would be the extension of this area to the west towards Station Road. Such an extension of the employment opportunities for the Town would dovetail with the potential residential site HOW2 which would consolidate the northern extension of Howden and provide a long term boundary.</p> <p>We understand from local Councillors that there is a need within Howden for a Community / Health Centre. The site at HOW2 provides the potential for delivery of a Community / Health Centre, providing an extra benefit to the local area.</p> <p>Following the positive resolution for residential development at land between Station Road and Selby Road, Howden, it is clear that East Riding Council are already looking to the north of Howden for future development opportunities. The site at HOW 2 provides a suitable long term residential site which should be</p>	

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			<p>allocated for residential use in the medium term to serve local needs in Howden and provide much needed new homes in East Riding. The sites located to the southeast of Howden are undevelopable due to their location in flood zone 2 and 3, and HOW 4 is located some distance from the centre of Howden in a less suitable location. HOW 2 is therefore sequentially preferable to all other potential development sites in Howden and should be identified for residential development.</p>	
<p>Mr Mark Jones, Barton Willmore on behalf of Stuart Evison</p>	<p>CSFC/1044</p>	<p>Observations</p>	<p>This report is submitted on behalf of Stuart Evison (hereafter referred to as the "client") in response to the Core Strategy Further Consultation (CSFC) document which is currently subject to public consultation.</p> <p>We acknowledge that there are a number of key issues which need to be considered in respect of the Core Strategy. Paragraph 1.5 of the Core Strategy states that its purpose is to concentrate on the following:</p> <ul style="list-style-type: none"> • Refreshed and additional settlement place statements; • Proposed amendments to the Settlement Network and development in rural areas; • The scale of housing and employment growth; and • Two specific housing issues covering affordable housing and open space provision. <p>It is, however, noted that the document does in fact set out a new approach to the development strategy and as such, it is a somewhat comprehensive change. It is within this context that we set out our detailed client's representations (under the headings below).</p>	<p>Comments noted.</p>

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			<p>Further, it is noted that we have recently met with the Council to discuss the framework being set by the Core Strategy in connection with our client's land interests. It is acknowledged by the Council in that meeting that the site is in a sustainable location given that it adjoins the regional City of Hull.</p>	
<p>Mr Mark Jones, Barton Willmore on behalf of Stuart Evison</p>	<p>CSFC/1045</p>	<p>Object</p>	<p>Our client owns land to the North of Cumbrian Way which is within East Riding of Yorkshire but directly abuts the administrative boundary with Hull City Council.</p> <p>The site is being promoted for residential development as a broad location for growth, through the East Riding Local Development Framework. Our client has also made comments in respect of the Hull Core Strategy. The plan below shows the area of the broad location.</p> <p>[See attached file for plan]</p> <p>The site would provide a very sustainable, urban extension as a broad location for growth. It is a deliverable site and in single ownership, benefitting from existing access.</p> <p>The majority of the broad location lies within Flood Zone 1 and it is in fact the only green field land to the north of Hull which does not have wider flood risk implications. Whilst the broad location includes some Flood Zone 2&3 land, the vast majority is outside of these zones and development would be in Flood Zone 1 only.</p> <p>The site adjoins North Bransholme, which is one of Hull's regeneration areas. It would provide a mix of housing types and tenures, thus contributing to the overall regeneration activity in Hull. Financial contributions from</p>	<p>Comments noted. The option of urban extensions to Hull was presented and rejected in the Further Consultation document.</p> <p>Individual sites are considered through the Allocations Document.</p>

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			<p>increased land values could also benefit the adjacent regeneration efforts at a time when HCA funding is very limited.</p> <p>The site is not in any protected landscape designations. It has no other identified constraints.</p> <p>The Core Strategy should address the fundamental issue of cross boundary working with Hull City Council to support development that helps to deliver the Hull Housing Market Area. It is our client's position that land at Cumbrian Way should be identified as a broad location for growth in the Core Strategy. This position is supported by RSS and national policy guidance.</p>	
<p>Mr Mark Jones, Barton Willmore on behalf of Stuart Evison</p>	<p>CSFC/1050</p>	<p>Object</p>	<p>Our client objects to a number of the revised policies and supporting text within the Core Strategy Further Consultation document. The fundamental concern relates to the failure to properly consider the potential of urban extensions sites which adjoin the Regional City of Hull.</p> <p>The Core Strategy fails to incorporate a framework for urban extensions to the Regional City where they are located outside of the Haltemprice settlements. This does not align with RSS.</p> <p>We note that the Core Strategy Preferred Approach document issued in 2010 referred to cross boundary working with Hull, However the framework as set out, does not reflect this. Urban extensions around Hull appear to have been discounted at an early stage of the Core Strategy without suitable testing. This position also appears to be based solely on a meeting with Hull City Council and the subsequent memo. This fails to adequately consider the duty to co-operate which is now part of the Localism Act</p>	<p>Comments noted. The option of urban extensions to Hull was presented and rejected in the Further Consultation document.</p>

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			<p>2011.</p> <p>PPS12 makes it clear that in order for Core Strategies to be justifiable they must be founded on a robust and credible evidence base and must be the most appropriate strategy when considered against the reasonable alternatives. To ignore suitable locations adjoining the Regional City is not the most appropriate strategy for the location of new development. The document also needs to be flexible to ensure that it can deal with changing circumstances within the lifetime of the plan.</p> <p>We do not consider that the Council has provided any credible evidence to justify their reasons (set out on pages 25 and 26 of the Core Strategy) for rejecting urban extensions to the City of Hull. Barton Willmore has provided comments on each of the four reasons given by the Council as overall, we are unconvinced by the reasons stated. We therefore feel that the approach to support urban extensions to the City of Hull has not been objectively assessed on valid planning grounds.</p> <p>Whilst our client supports the Council's decision to increase the annual housing target, we consider that 1,500 dwellings per annum may still be low given the recent DCLG household projections. Effectively there is no real increase as much of the additional growth is accounted for by the shortfall from previous years which needs to be carried forward.</p> <p>We object to the proposed distribution of housing growth which apportions 21% to those settlements listed in the bottom tier in the Council's settlement hierarchy. These comprise of small unsustainable settlements in rural</p>	

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			<p>locations compared to our client's site at Carlam Hill which would represent growth on the edge of the Regional City of Hull in a sustainable location. The Core Strategy therefore is not in compliance with national planning policy guidance such as PPS1 and PPS3 which seeks to ensure that housing is developed in suitable locations with good access to jobs, key services and infrastructure.</p> <p>Overall, we consider that the Core Strategy does not provide the best and most suitable approach to directing growth in East Riding and is contrary to national planning policy guidance. We object on this basis.</p>	
Zoe Buddle, Natural England	CSFC/1056	Observations	<p>Natural England has previously made substantial comments on the Core Strategy (July 2010 – Preferred Approach) and these comments should be considered alongside our response to the further consultation document.</p> <p>Since commencement of the public consultation period the Local Planning Authority has supplied amended versions of Policy HQE4 (Enhancing Biodiversity and Geodiversity) and Policy SS59 (Managing the distribution of employment land), therefore Natural England's comments are based on these revisions, which were received via email on 2 December 2011.</p>	Comments noted.
Zoe Buddle, Natural England	CSFC/1059	Observations	<p>Additional comments – Pocklington Canal and Green Infrastructure (GI)</p> <p>Natural England would like to make additional comments in relation to GI provision.</p> <p>We consider that the regional indicative GI Corridor in the Lower Derwent Valley (originally shown on Fig 21 of the Preferred Approach Core Strategy) should be</p>	Comments noted. The canal areas has been added as a Local GI corridor in the Draft Strategy Document.

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			<p>extended along the Pocklington Canal corridor. The Ramsar/SAC/SPA designations in this area extend along this corridor and the Pocklington Canal SSSI provides a critical link. Furthermore Pocklington Canal would also provide a connection to the Pocklington Market Weighton Sub Regional GI corridor.</p> <p>The map included in the Appendix to this letter shows the various nature conservation designations along the Pocklington Canal corridor and Natural England suggests that this should provide the basis for the GI Corridor in the Core Strategy. The GI Corridor should include the designated sites shown on the map along with the non-designated section of the Canal (shown on the map) between Derwent Ings SSSI and Melbourne and Thornton Ings SSSI.</p> <p>The above would help to assist in the protection and enhancement of land for GI and nature conservation and to ensure improved awareness of the importance of waterways such as the Pocklington Canal.</p>	
<p>Gemma Edwardson, Edwardson Associates on behalf of T and K Houghton, Care of Edwardson Associates</p>	<p>CSFC/765</p>	<p>Object</p>	<p>LOCAL DEVELOPMENT FRAMEWORK SUBMISSION BY EDWARDSON ASSOCIATES LIMITED ON BEHALF OF T AND K HOUGHTON</p> <p>Flamborough – Local Development Framework Submission</p> <p>Land Bid – Land to the North of Craike Wells and High Holme, Flamborough</p> <p>Introduction</p> <p>We submit this land bid in relation to the parcel of land identified on the enclosed plan. The land is located to the</p>	<p>Comments noted. Individual sites are considered through the Allocations Document.</p>

Consultee/Agent	ID	Nature Of Response:	Response	Officer Comments
			<p>North of Flamborough and it is requested that this land bid submission is considered as a formal request to be included as an allocation for housing in Flamborough in the emerging Local Development Framework (LDF) and Allocations DPD.</p> <p>The submission also includes comments in response to the Core Strategy Further Consultation which is currently open for comments and in particular responds to the proposed growth within Flamborough as a result of this policy.</p> <p>Executive Summary</p> <p>The proposed site is considered appropriate to warrant formal allocations for housing as it can be developed in a sustainable way without giving rise to any unacceptable harm. It will effectively contribute to the housing land requirements of the East Riding of Yorkshire and in particular Flamborough Village.</p> <p>Flamborough is a sustainably located settlement with a full range of facilities which are in need of supports through future housing growth.</p> <p>There are now a range of employment opportunities in the immediate area through tourism, local services and light industrial/commercial activity.</p> <p>The site is suitable to deliver a mixed residential development and to provide a variety of housing types. The size of the land parcel is adequate to provide a sensitive and well screened development, capable of accommodating a quality scheme combining effective</p>	

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			<p>screening, green space and high quality design principles. This will be essential for any development within the Heritage Coast – as all the land in this area is designated.</p> <p>The Site</p> <p>The site is located to the north of Flamborough and to the East of The Grange, Bempton Lane and The Bempton Lane Industrial Estate. It currently comprises of agricultural land which forms a larger holding. Residential development is located immediately to the south of the eastern side of the land parcel. The existing development limit (in accordance with East Yorkshire Borough Wide Local Plan, June 1997) forms the southern boundary of the site.</p> <p>***please see hard copy for an aerial view and outline of the site***</p> <p>The site is approximately 3.6 hectares (8.9 acres) and benefits from access via a private road owned by the landowner which has direct access from Bempton Lane. The private access available also means that there are no ownership constraints that might prevent the land being made available immediately. The land is solely owned by Mr and Mrs Houghton, including the land adjacent to the access so if widening or improvements are required it will be possible.</p> <p>The provision of an alternative access directly onto Bempton Lane will direct associated vehicular movements away from the village centre, which can become congested particularly in the Summer months given the popularity of the settlement and surrounds with visitors.</p>	

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			<p>The land lies outside the settlement's Conservation Area and is located away from the village's Scheduled Ancient Monument and Principle Nature Conservation Constraint areas located to the South and West of the village.</p> <p>The land does not fall within a High Flood Risk Area and therefore conforms with policy aims to direct development to areas of lowest risk of flooding.</p> <p>****please see hard copy of response for a map showing the SFRA flood areas in the vicinity of Flamborough****</p> <p>The land is moderate quality agricultural land and forms a modest part of a larger agricultural holding. The public footpath which runs along the southern boundary of the site presents security issues with farming the area and the future development of the site would promote pedestrian access to the settlement's services and facilities.</p> <p>The site is located within the designated Heritage Coast, as are all of the sites submitted in the village.</p> <p>Flamborough is within easy walking and cycling distance of the site. A public footpath directly links the site to the centre of the village and is approximately 500m by foot.</p> <p>Settlement Status and Profile</p> <p>Revised Policy SS2: Locating Development identifies The Settlement Network in which Flamborough is categorised as a Secondary Rural Service Centre.</p> <p>Flamborough is located in the Bridlington Coastal Sub Area and provides a well serviced rural settlement.</p>	

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			<p>Flamborough's services are diverse and include: Co-Op shop, Flamborough Library, Flamborough Service Station, Post Office, Flamborough Pharmacy, Newsagents, Convenience Store, four Public Houses, Village Hall, Church Hall, Doctor's Surgery, Bowling Club, Golf Club, Flamborough Pre-School and Flamborough Primary School.</p> <p>Employment opportunities are also available within the settlement with tourism providing a range of jobs in hotels, restaurants and campsites. In addition, the industrial estate located on Bempton Road is a valuable source of employment which the immediate area benefits from.</p> <p>Public transport links include the EYMS bus services 500, 501, 502 and 510 linking the settlement to Bridlington.</p> <p>Development within Secondary Rural Service Centres will 'provide more limited development to sustain and meet the needs of rural areas'. This type of growth in Flamborough is supported and as a rural settlement hosting a range of local services, future growth is essential to support the existing businesses and services available.</p> <p>Residential development is supported 'commensurate with the scale role and character of the village' within Flamborough. A sensitive and attractively designed housing scheme in this location would meet these criteria and could be phased over the plan period.</p> <p>Site Assessment</p> <p>A balanced high quality mixed housing development which is needed in an attractive location can attract economically</p>	

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			<p>active purchasers into the area.</p> <p>Taking these factors into account, it is considered appropriate to consider this site as suitable for sustainable housing growth, considering the location of the site in relation to employment, educational and health facilities, which are within the recommended walking and cycling distances of the site.</p> <p>The level of housing required means there is a requirement for a number of sustainably located Greenfield sites to contribute to meet the housing needs. This site provides the opportunity for development which is not detached from the built form without the need to encroach into the conservation or nature protection areas in other areas of the settlement.</p> <p>The proposal site is well within the recommended cycling and walking distances identified in national guidance and is in a sustainable location with an extensive range of services and facilities in Flamborough.</p> <p>The allocation of this site for housing is considered an important element in achieving wider objectives whilst making an important contribution to the supply of housing land required over the plan period.</p> <p>The site is not within an area identified as high flood risk. There are no ownership constraints which prevent the land from becoming available almost immediately.</p> <p>The allocation of this land for residential development would provide a suitable and sensitive location for housing as it benefits from residential development to the south</p>	

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			<p>and west of the parcel and is a natural 'rounding off' to the settlement.</p> <p>The site is well located in relation to village facilities and sits adjacent to the existing Development Limit defined in the East Yorkshire Borough Wide Local Plan.</p> <p>Independent and separate vehicular access to the site is available and would be direct from the Bempton Lane highway which is considered to be capable of accommodating the traffic associated with modest housing development.</p> <p>The approximate number of additional dwellings on allocated sites in Flamborough indicated as being needed by the LDF for the plan period is 85. This site is considered appropriate to accommodate this growth as a phased development over the plan period.</p> <p>The positive allocation of sites for housing development in the rural settlements like Flamborough which have a range of facilities as well as good road access (and where such sites can be developed without adverse impacts on their character) is considered preferable to concentrating all development in the larger settlements which may result in far more significant environmental impacts and/or entail development on land identified as being at risk of flooding.</p> <p>This approach has the potential to spread development more widely whilst reducing impacts on the character and appearance of the District. Identifying appropriate sites in Flamborough would facilitate a reduction in the need to allocate more sensitive sites on the edge of towns in the Service Centres and elsewhere while at the same time</p>	

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			<p>providing for an appropriately modest degree of development to maintain the vitality and viability of Flamborough without damage to the countryside.</p> <p>Gemma Edwardson B.Sc(Hons) MRICS</p> <p>December 2011</p> <p>*****Please see hard copy of response for an outline of the site shown on the Allocations DPD potential sites plan for the village from 2010*****</p>	
<p>Gemma Edwardson, Edwardson Associates on behalf of S Griffin,</p>	<p>CSFC/351</p>	<p>Observations</p>	<p>LOCAL DEVELOPMENT FRAMEWORK SUBMISSION BY EDWARDSON ASSOCIATES LIMITED ON BEHALF OF MR S GRIFFIN</p> <p>SITE 1 - LAND TO THE WEST OF YORK ROAD ROUNDABOUT</p> <p>SITE 2 – LAND AT BACK LANE AND YORK ROAD, LITTLE DRIFFIELD</p> <p>LAND BID AND FURTHER POLICY COMMENTS</p> <p>Introduction</p> <p>We submit these land bids in relation to the parcels of land (see enclosed plan) to the West of York Road, Little Driffield and land at Back Lane, Little Driffield. We would be grateful for this land bid to be considered further as a formal request to be included as an allocation for housing in Little Driffield in the emerging Local Development Framework (LDF) and Allocations DPD.</p> <p>This land bids support previously submitted bids which are</p>	<p>Comments noted. Individual sites are considered through the Allocations Document.</p>

Consultee/Agent	ID	Nature Of Response:	Response	Officer Comments
			<p>now amended by this submission.</p> <p>This letter also includes submissions with regard to appropriate policy considerations. We would ask that these policy comments be considered as comprising representations in relation to the emerging Core Strategy.</p> <p>The proposed sites are considered appropriate to warrant formal allocations for housing as they can be developed in a sustainable way without giving rise to any unacceptable harm and will effectively contribute to the housing land requirements of the East Riding of Yorkshire.</p> <p>In addition to the Local Authority's stated housing requirements, further provision might be required due to the Coalition Governments' relaxation of the high density threshold for new housing development and reducing the potential for windfall housing due to the change of status of garden land in order to achieve the identified housing land supply figures and as a consequence of more recent government announcements. In any event, the potential for small scale housing schemes should not be ruled out in appropriate smaller settlements bearing in mind the potential availability of suitable sites within the village and/or buildings for conversion, particularly if the settlements are either relatively sustainable in themselves or have ready access to a range of services/facilities nearby.</p> <p>In this case, Little Driffield is considered to have an important function as an adjunct to Driffield and offers the potential to serve a supporting role to help sustain the town, with particular regard to the provision of high quality housing in an attractive village environment. Such</p>	

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			<p>provision is much in demand and particularly appeals to people seeking to invest in an area but who regard the availability of attractive village housing as a key factor in their decision making in terms of where they wish to live and develop or relocate their businesses.</p> <p>Site 1</p> <p>(See hard copy of response for a aerial view of the site concerned to the east of Little Driffield)</p> <p>The site is located within Little Driffield and lies adjacent to the built form of the settlement with residential development to the west. The site boundaries comprise of the York Road roundabout to the far East, the A166 to the far North and residential properties to the West.</p> <p>There are no ownership constraints that would prevent the site becoming available for development within five years. Access is available directly from York Road.</p> <p>The site currently benefits from extensive mature planting and hedging which effectively screens the site from the nearby roads.</p> <p>The site area is known as York Road Gardens and has been used previously as commercial land.</p> <p>The land subject of this proposal does not fall within a High Flood Risk Area and therefore conforms with policy aims to direct development to areas of lowest risk of flooding.</p> <p>The site is not within a Conservation Area and is not</p>	

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			<p>considered to be particular townscape or other merit. There are no known Listed Buildings or Scheduled Ancient Monuments nearby that could be affected. The land has not been identified as an important archaeological site.</p> <p>There are no known biodiversity constraints and the site is not currently in agricultural production so development would not result in the loss of good quality agricultural land.</p> <p>Site 2</p> <p>(See hard copy of response for a aerial view of the site concerned to the west of Little Driffield)</p> <p>The site is located off Back Lane in Little Driffield. It lies adjacent to the built form and has residential development to the East and South of the land parcel.</p> <p>The site includes a football field and an area of orchard land to the East of the site. The site boundaries are well screened from the road links to the North and West and is a natural 'rounding off' point for the settlement.</p> <p>The land subject of this proposal does not fall within a High Flood Risk Area and therefore conforms with policy aims to direct development to areas of lowest risk of flooding.</p> <p>There are no known ownership constraints that would prevent the site becoming available within five years.</p> <p>The site is not within a Conservation Area and is not considered to be particular townscape or other merit.</p>	

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			<p>There are no known Listed Buildings or Scheduled Ancient Monuments nearby that could be affected. The land has not been identified as an important archaeological site.</p> <p>There are no known biodiversity constraints and the site is not currently in agricultural production so development would not result in the loss of good quality agricultural land.</p> <p>The Land has good and safe access onto the public highway network.</p> <p>The site is strategically well placed with good access to services and facilities in Driffield as well as those, such as the public house, in the village itself.</p> <p>It is within easy walking and cycling distances of the town (less than 1.1 miles by road or foot) and good public bus services pass by the site linking to employment opportunities available within Driffield, Kelleythorpe and elsewhere.</p>	
Mr Matthew Naylor, Yorkshire Water	CSFC/1012	Support with conditions	Thank you for consulting Yorkshire Water on the above consultation. We are generally supportive of the Core Strategy and have the following comments.	Support noted and welcomed.
Mr Daniel Wheelwright, Ryedale District Council	CSFC/1066	Support	With respect to the broad interrelationship of these elements of the proposed strategy, we believe the proposed options being taken forward are complementary with our own strategy.	Support noted and welcomed.
Mr Roy Hunt	CSFC/1067	Observations	The underlying purpose of this Core Strategy is to decide in broad terms where future housebuilding development should be focused in future years. The previous consultation document looked at the facilities and	Comments noted. The Infrastructure Study and regular liaison with service and utility providers has allowed the Strategy to consider the demand

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			<p>infrastructure that supported communities. Therefore, a community that had good access to major road and rail links, schools, shops, work places and leisure facilities would attract more new housing than one that did not. In general terms this makes sense.</p> <p>However, the previous consultation document was seriously flawed in that it looked at what was available only within the boundary of a village, ignoring what was available within a “reasonable distance” and ignored whether a facility had scope to expand, for instance was the village school already full to bursting or were there plenty of places available to be filled.</p>	<p>expected to be placed on infrastructure.</p>
<p>Ms Elaine Aird, Beverley Town Council Planning Committee</p>	<p>CSFC/1082</p>	<p>Observations</p>	<p>[Based on Beverley Town Council Planning Committee discussion - 28/11/11]</p> <p>What do we need to do to designate a neighbourhood area?</p> <p>Can we change the title of the Beverley Town Plan to a Neighbourhood Development Plan (NDP)?</p> <p>It seems a big risk for the Town Council that the local authority, in determining the plan, could choose not to adopt it.</p>	<p>Comments noted. A neighbourhood planning webpage has recently been set up on the East Riding of Yorkshire Council website. This webpage provides information about neighbourhood planning. A briefing note has also been provided to Town and Parish Councils detailing the process for preparing a Neighbourhood Development Plan or Order in the East Riding (including the designation of Neighbourhood Areas) and how the East Riding of Yorkshire Council can help.</p>
<p>Ms Elaine Aird, Beverley Town Council Planning Committee</p>	<p>CSFC/1083</p>	<p>Observations</p>	<p>[Based on Beverley Town Council Planning Committee discussion - 28/11/11]</p> <p>How will the presumption in favour of sustainable development impact on planning decisions in Beverley?</p> <p>How are the national cuts in planning going to impact on this?</p>	<p>Comments noted. The plan has been prepared to be in conformity with the final version of the National Planning Policy Framework (NPPF). The NPPF provides a definition of 'sustainable development'. The Draft Strategy Document seeks to advance</p>

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				sustainable development by setting a locally distinctive framework to meet the future needs of the East Riding.
Ms Helen Gregory, Ryedale District Council	CSFC/1090	Support	As a whole Selby District Council broadly supports the approach in the Core Strategy. SDC welcomes opportunities to work with East Riding of Yorkshire Council on cross boundary issues as both progress Local Development Frameworks. It is understood that joint working will be formalised through a Memorandum of Understanding or similar document in the future. This will help to ensure local plans complement each other and will demonstrate how both authorities are fulfilling their duty to co-operate.	Supported noted.
Paragraph 1.1				
Mr Michael Goulding	CSFC/66	Observations	Given that the document takes into account economic development, it is strange that given the importance of agriculture to the economy of the East Riding, there appears to be no reference to it or the importance, wherever possible, of preserving prime agricultural land for the production of food and energy crops as a guiding principle of development policy.	Comments noted. The Site Assessment Methodology which is used to assess which sites are most appropriate for allocation in the Allocations Document takes into account whether development would result in the loss of the best and most versatile agricultural land. The agriculture sector is recognised in the economic aspects of the Draft Strategy Document.
Paragraph 1.2				
Mrs Thelma Brown	CSFC/29	Observations	The first priorities should be to identify and confirm the need to build, if a need is confirmed then the areas requiring development should be debated and a careful	Comments noted. The revised housing requirement has taken into account a wide range of issues that

Consultee/Agent	ID	Nature Of Response:	Response	Officer Comments
			<p>review of all brown field sites available for development should be undertaken. The quality of any developments needs careful scrutiny to ensure that they have the best possible ecological credentials.</p> <p>In terms of housing need, Beverley relies heavily on the public sector for employment. This sector is shrinking quickly and it will continue to do so over the next few years. Therefore, it should not be the subject of further large scale house building. The area along the M62 corridor together with small developments to sustain the viability of villages and their amenities are more appropriate venues.</p> <p>To the extent that development within Beverley is required , there is sufficient brown field land available. Although this is not the first choice of developers because the need to cleanse the land prior to development reduces the profit margins, this is the land which should be used. Green field land should remain precisely that until all the brown field land available has been used but we are many years from that scenario.</p> <p>The design quality of any new development should be the subject of rigorous scrutiny to ensure that it meets both the ecological and aesthetic needs of the area in which it constructed.</p>	<p>would affect future housing growth in the East Riding. This has included analysis of the most recent subnational population and household projections, alongside other sources of evidence, such as the Council's Strategic Housing Market Assessment (SHMA), Infrastructure Study and Strategic Flood Risk Assessment. This reflects guidance within the NPPF and supports a higher level of housing growth than previously set out in the Regional Spatial Strategy.</p> <p>Individual sites are considered through the Allocations Document.</p> <p>The selection of 'preferred' sites will take into account planning policies in the National Planning Policy Framework (NPPF), including encouraging the effective use of land through the re use of Brownfield land wherever possible.</p> <p>Policy ENVI of the Draft Strategy Document seeks to integrate high quality design into development by setting requirements for development in order to safeguard the diverse character and appearance of different areas.</p>
Professor Barbara English	CSFC/361	Observations	We have found it difficult to use this eform. The help links do not work. Attempts to 'save as draft' have twice	Comments noted. We have fed back your concerns regarding using the

Consultee/Agent	ID	Nature Of Response:	Response	Officer Comments
			<p>resulted in all the entries being deleted. The closing date of 19 December is probably the most difficult date that could be offered to the general public. The consultations in different centres were limited to a few hours each, which made it very hard for working people to attend.</p> <p>Beverley and District Civic Society. We agree wholeheartedly with the comments of Mrs Thelma Brown. Beverley cannot continue to grow indefinitely. Little attempt is made to bring employment to the town to supplement the shrinking public sector. There is a large amount of brown field sites in the town, but the Council seems to wish this to be used for retail, and not employment or housing.</p> <p>It is worth noting that many of the comments in this consultation are by developers or their agents, pressing for more sites and less restriction.</p>	<p>online system to the software providers. These issues should now be resolved.</p> <p>The timing of the consultation was intended to miss holidays and ensure timely progression with the preparation of the document.</p>
Paragraph 1.5				
Mr Anthony Kirk	CSFC/18	Observations	Affordable housing has already become a matter of great concern nationally and the East Riding is no exception being a mixture of agricultural smallish villages and larger townships including infill sites which require sensitive housing development. QUESTION: what is the policy for small site infill housing development?	Comment noted. Policy S4 in the Draft Strategy Document sets out the approach for housing development in Villages and the Countryside. This policy specifies that within the 'development limits' of Villages, new housing of a very small scale, usually comprising a single dwelling, will be supported where the development does not detract from the overall character and appearance of the village.