

General comments

Preferred Approach Core Strategy				
Consultee	Nature Of Response:	Comment ID	Response	Officer Comments
Mr Alastair McIntyre, Government Office for Yorkshire and the Humber	Observations	CSPA/154	There appear to be several references in policies to relevant issues being dealt with in SPDs that will be prepared. You will need to satisfy yourself that the important decisions and that appropriate/strategic material is in the Core Strategy and not being delegated to SPDs which have limited weight and are limited in the type of material they can contain.	Comments noted
Mr Alastair McIntyre, Government Office for Yorkshire and the Humber	Observations	CSPA/156	On the face of it, there appears to be limited contingency planning or planning for uncertainty so far. It is not clear that the implications of uncertainty have been taken into account. Has a risk analysis been carried out? Some policies seem to have factored in changes in the economic climate but the document needs to be more explicit about how alternative outcomes and contingencies have been planned for and should establish robust mechanisms for change.	The Delivery, Monitoring and Reviewing section of the Draft Strategy Document outlines actions the authority will take if policies are underperforming against their targets.
Mr Alastair McIntyre, Government Office for Yorkshire and the Humber	Observations	CSPA/157	The document is very long. I appreciate that the Publication version should by definition be shorter since material on the face of the Preferred Approach document should not need to be on the face of the final document. For example, information such as consultation responses and alternative options can be in separate supporting docs but you should consider whether and how the document can be shortened further.	Every effort is being made to make sure the document is as short as possible without compromising necessary details.
Mrs Toni Cornford, Skeffling Parish Council	Object	CSPA/399	We found the Core Strategy to be a reasonable document but feel we cannot answer your questions because they are not relevant to our input. We feel the document should be interoperated by competent planning officers. We think evolution plays a big part in development, i.e. creating shops, businesses etc. Flexibility and common sense must apply to the contents of the Core Strategy. Interpretation of planning rules should not be restricted by one person. They should be negotiable with other planning officers.	Comments noted

			In our experience as a Parish Council whatever recommendations we have made have always been ignored. Local knowledge is also ignored. We cannot stress enough that co-operation and negotiation are the key issues where planning is concerned, between local people with local knowledge. 'Have your say' does not take this into consideration. 71% of the East Riding population are termed as rural communities. Listen to them.	
Mr Dan Mitchell, Barton Willmore on behalf of Mr Paul Butler, Barratt and David Wilson Homes	Object	CSPA/264	5) Throughout the Core Strategy reference is made to the need of concentrating the majority of development to the Major Haltemprice Settlements, Principal Towns and the Local Service Centres. Our client would ask the Council to ensure that this is reflected throughout all of the Core Strategy policies and that this approach is adhered to. Our client is concerned that the Core Strategy as currently drafted seeks to promote 1/5th of all new housing development in the countryside of East Riding contrary to national and regional planning policy guidance.	National guidance doesn't set an upper limit to the amount of development that can be located in the countryside. The majority of housing development in the Preferred Approach (around 80%) is located in Major Haltemprice Settlements, Principal Towns and Local Service Centres.
Mr Dan Mitchell, Barton Willmore on behalf of Mr Paul Butler, Barratt and David Wilson Homes	Support with conditions	CSPA/258	Barratt and David Wilson Homes is generally supportive of the Preferred Approach Core Strategy, although does have some concerns as indicated within this report. The council need to ensure that the Core Strategy is consistent with national policy and in general conformity with the RSS.	Comments noted
Mr Ian Owston,	Observations	CSPA/397	I am currently working on my responses to the above document, and must tell you that I find it extremely difficult to handle. I have downloaded it to a Word file, but have drawn the line at printing to off! Despite the fact that I have some understanding of the layout and terminology of these documents, arising from having organised several major Local Plan Inquiries in North Yorkshire in the past, the document does not make things easy for the layman. 1. It is large (262 pages of dense text). 2. It is not easily available. Public libraries, but you need to have considerable access to be able to deal with all of the issues, and such access is difficult if you live in a rural area, not near to a public library. Parish Councils have a copy, but Councillors need access, and would probably not lend it to members of the public. It can be downloaded, but without Broadband it is very time-consuming. Many people do not have access to a	Every effort is being made to make sure the document is as short as possible without compromising necessary details. A summary version of the document was available.

			<p>computer, or lack the basic skills to handle the website.</p> <p>3. The language is very specialised, and will probably be almost incomprehensible to most members of the public. I understand the need for all of the document in its existing form, but I wonder if it would have been helpful to have published simultaneously a simplified (non-legal) version, with suitable disclaimers, slimmed down to - say - just the Policy statements and a little introductory or explanatory wording. People with no prior knowledge of the Local Planning system would then have a reasonable chance of at least understanding what you are proposing, and could refer to the full document if they wanted to explore further. With the present document, I fear many (?most) people will be put off after the first few pages, which is surely not what you would wish to happen. My local Parish Council has deputed some Councillors to attempt to precis the document for the better understanding of the others. I fear for their attempts.</p> <p>In addition, several friends and neighbours to whom I have spoken recently have found it difficult to navigate the website, and have asked me to provide them with copies of (eg) the Allocations maps and accompanying text. Unless you understand the Local Planning system, it is easy to become lost in the website, simply by not understanding the terminology. I realise that it is too late to make any changes to the current version of the Plan, but it may help towards a greater understanding of what you are about if you could produce a simplified (layman's) version of the Publication document. Please accept that I make these comments in an attempt to be helpful.</p>	
Rose Freeman, The Theatres Trust	Observations	CSPA/565	We strongly recommend the inclusion of a Glossary to explain various terms.	Comments noted, a glossary has been added to the Draft Strategy Document.
Mr Adrian James, Barton Willmore on behalf of Lord Feoffees	Support with conditions	CSPA/480	In conclusion, the Lords are supportive of the Preferred Approach Core Strategy DPD where its proposed visions and policies for Bridlington are deliverable and are likely to be of benefit to the town's community and economy. However the Lords are concerned that some policies, and in particular the strategy for Bridlington Town Centre, does not do this.	Comments noted
Mrs Kemp,	Object	CSPA/635	I write to you in response to the pack I was sent surrounding the Allocation Development Plan & Preferred Approach Core	Noted. Every effort will be taken to ensure the document is understandable for members

			Strategy Plan. Firstly may I say how incredibly confusing this is for the public to decipher. The language in which the Council use to draft the documents is quite obviously understood by internal members of staff but not the general public. This is why I have taken it upon myself to write a simple letter as opposed to answering the questions in both questionnaires. It really is an appalling document. The only files, which make any sense on the disk, are the maps and a list of applications on the land suggested for development.	of the general public. A glossary has been added to the Draft Strategy Document and a Summary Document has been prepared.
Zoe Buddle, Natural England	Observations	CSPA/512	On 6 July 2010 the Chief Planning Officer wrote to all Local Planning Authorities in England informing them of the revocation of Regional Spatial Strategies. From Natural England's perspective the revocation statement outlines that local authorities should continue to work together, with communities, on conservation, restoration and enhancement of the natural environment, including biodiversity, geo-diversity and landscape interests. Authorities should continue to draw on available information, including data from partners, to address cross boundary issues such as the provision of Green Infrastructure (GI) and wildlife corridors (CLG, 6th July 2010).	Comments noted
Clr Arthur Hodgson, Keyingham Parish Council	Object	CSPA/665	Many issues to be addressed.	Comments noted
Ms Diana Sandy,	Observations	CSPA/779	262 pages is an awful lot to wade through especially with so much repetition. A summary would be helpful at the beginning. 262 pages is an awful lot of words and academic-essay style phrases which sound wonderful but mainly serve to cover up a few basic proposals: <ul style="list-style-type: none"> ◆ There is covert emphasis on house building and development of yet more estates. [It should be noted that all predictions for the need for new housing is based on 20th century computer generated models proclaimed by the building industry and supported by the money lenders and estate agent fraternity.] ◆ A 20th century emphasis on the mixture as before in terms of light industry and economic growth; ◆ An acceptance that the future is going to be like the past 	Noted. Every effort will be taken to ensure the document is understandable for members of the general public. A glossary has been added to the Draft Strategy Document and a Summary Document has been prepared. The policies regarding house building and development are very prominent and occupy much of the document's space. The method for calculating the scale of housing growth in the authority are explained further in Chapter 4 of the Core Strategy Further Consultation document. Comments on climate change and fossil fuels

			<p>only 'better';</p> <ul style="list-style-type: none"> ◆ Current problems which exist and have existed for years will not be addressed; ◆ A pandering to the emotions rather than encouraging an acceptance of some of the real issues; ◆ The constant acceptance of the climate change mantra to the exclusion of the associated and more problematic issue of the decline in fossil fuels. The effects of this latter will begin to be noticed within five years. Planning for them should supersede all else. 	noted.
Mr G E Wright,	Observations	CSPA/922	<p>In light of the revocation of the Regional Spatial Strategy a significant re-consideration of the issues is justified and appropriate.</p> <p>Much of the policy of the Joint Structure Plan (JSP) was determined by the requirement to conform with RSS and as such that framework is an inappropriate base for the LDF for East Riding.</p> <p>Principles of sustainable patterns of development as set out in PPS1 however, should remain to be observed and provide a framework for the LDF.</p>	Noted. The Further Consultation and Draft Strategy Document have been prepared to address these issues.
Mr G E Wright,	Observations	CSPA/934	The document sets our policy in respect of matters where material policy statements already provide a suitable and adequate framework.	Comments noted
Mr G E Wright,	Observations	CSPA/935	There are too many detailed policies and the document presents itself more in the style of a former Local Plan.	Comments noted
Cllr Charles Bayram, ERYC	Object	CSPA/913	<p>Thank you for giving me the opportunity to make representations on the LDF Preferred Approach Core Strategy Consultation.</p> <p>I am an Elected Member of the East Riding of Yorkshire Council Unitary Authority, also the longest serving member of the Authority's Planning Committee. I hope the following is received with those two points in mind.</p> <p>Councillors have been responsible for Local Government from a time well before Parliament was formed. Until the great Reform Acts, Councillors inherited their position from those who formed the then Corporations. An enquiry in 1830 found they were constantly abusing their powers, acting outside the powers given to them and they interpreted the then national</p>	Noted. The Further Consultation and Draft Strategy Document have been prepared to address these issues.

		<p>Acts into local Acts in their own interests only, rather than that of their people.</p> <p>The Reforms gave us Councillors elected from time to time out of the people they serve. The first elected Councillors understood the system, their main role was to address the above issues. The Ultra Vires Rule was explained by Lord Blackburn at page 481 in the 'Attorney General - v - Great Eastern Railway Corporation (1880) "...where their is an Act of Parliament creating a corporation for a particular purpose and giving it powers for that particular purpose , what is does not expressly or impliedly authorise is to be taken to be prohibited ...":</p> <p>Delegations to an Officer was new to the 1971 Planning Act, at Section 4 Deligation was limited to Part 3 "The Determination of Applications".</p> <p>I have yet to see that power extended to Part 1 or Part 2 "the preparation of an altered or replacement development plan prior to public consultation.</p> <p>The 2000 Local Government Act was made for the purpose of altering the committee system, which had been in place almost 150 years, to a remodelled version of the previous system. The change was made by the "Local Authorities (Functions and Responsibilities) (England) Regulations 2000. The regulations where then clarified by an amendment in 2001 (copy attached) making it clear that the preparation of altered or replacement drafts for public consultation is not a Function of the Cabinet .</p> <p>The first consultation took place by Officers without the approval of either the Executive nor the Council.</p> <p>I am, therefore, saying the Authority must prove they acted within their powers.</p> <p>The current JSP was commenced after Government announcements were made that the past procedures were to change. At the JSP examination panel members saw the exercise as a waste of time. The Authority gave the impression that the JSP was a stop-gap with a very short life and would quickly be replaced with a core-strategy. Then, following the examination, the Authority announced that a core-strategy was not needed and the JSP would be used instead. (This gives the impression the Authority is unsure how to proceed.)</p> <p>It took until 2007 to persuade the Authority to produce a</p>	
--	--	--	--

			<p>core-strategy. It is now being rushed and parallel sister plans are being prepared, but if the core-strategy fails it will bring down other plans. See comments made by PAS.</p> <p>Section 113 of the 2004 Act (preceded by Section 284 of the 1990 Act) gives two areas of challenge to anyone who could be aggrieved, (a) the document is not within the appropriate powers and (b) the procedural requirement has not been complied with (misfeasance and nonfeasance).</p> <p>To overcome this the Authority should redraft the document, taking into account the loss of the RSS, then reconsult.</p>	
Mr Peter Gleave, DPP on behalf of Tesco Stores Ltd	Observations	CSPA/943	In general terms, it is apparent, through no fault of the Council at the time of writing, that the Regional Spatial Strategy has now been revoked. As such, any reference made to growth or strategic RSS policies should be deleted.	Noted. The Further Consultation and Draft Strategy Document have been prepared to address these issues.
Mr Alex Codd, Hull City Council	Observations	CSPA/902	The consultation on the Core Strategy commenced prior to the abolition of the RSS, however it is essential East Riding of Yorkshire council reviews their approach to ensure they have a robust local evidence to support the direction of the plan.	Noted. The Further Consultation and Draft Strategy Document have been prepared to address these issues.
Neil Watson, Rudston Parish Council	Observations	CSPA/854	<p>2. We believe that local views, as represented by Parish Council responses to Planning Applications, are not currently given sufficient weight by the Council Departments. Frequently, Parish Council views are overridden by council officers who do not know the local area. We suggest that:</p> <p>a. Town and Parish Council views should be given a high weighting in planning decisions.</p> <p>b. When planning applications are sent to Town and Parish Councils for response, planning officers should also give a short commentary on what their views are and why. Something along the lines of 'I am inclined to refuse this because ??'. This would remove a lot of the current frustrations, as Town and Parish Councillors are not experts on planning guidelines ? in general they use common sense and a local view on what is right for their locality.</p>	Comments noted
Ray Williamson, Regeneration Team, ERYC	Observations	CSPA/872	Overall, I think the Core Strategy takes full account of and acknowledges the work that has been done through the Regeneration / Renaissance Partnerships and the various Regeneration Plans and Strategies that have been produced, as far as it is able to do so.	Support welcomed
Mr Jason Tait,	Observations	CSPA/1253	Paragraph 2.15 confirms that the East Riding LDF will be based	Noted. The Further Consultation and Draft

<p>Planning Prospects on behalf of Horncastle Group PLC</p>			<p>upon the planned growth as set out within the Regional Spatial Strategy which suggests that East Riding's population could grow in the order of 47,000 by 2026. This is based on the RSS housing requirement of 1,150 dwellings (net) over 17 years multiplied by an average household size of 2.4 people per household.</p> <p>As part of the new legislative changes proposed for the Planning System the new Coalition Government has now, however, revoked RSS under s79(6) of the Local Democracy Economic Development and Construction Act 2009 and therefore RSS no longer forms part of the development plan for the purposes of s38(6) of the Planning and Compulsory Purchase Act 2004.</p> <p>This has implications for the production of the East Riding LDF and in accordance with DCLG Guidance now issued in July 2010, whilst this revocation is not a signal for local authorities to stop making plans for their area local planning authorities should continue to develop LDF core strategies and other DPDs, reflecting local people's aspirations and decisions on important issues such as climate change, housing and economic development.</p> <p>The guidance makes it clear that Local planning authorities will be responsible for establishing the right level of local housing provision in their area, and identifying a long term supply of housing land without the burden of regional housing targets. Some authorities may decide to retain their existing housing targets that were set out in the revoked Regional Strategies. Others may decide to review their housing targets. We would expect that those authorities should quickly signal their intention to undertake an early review so that communities and land owners know where they stand. In this context we would look to the LPA to provide for a clear and swift statement of their intent in this regard. If the LPA are intent on revisiting the RSS figures for growth, then the evidence for this needs to be consulted upon. Equally if they are no intent on revisiting the RSS figures for growth, then the RSS baseline evidence to support the level of growth needs to be made available in the LDF context.</p>	<p>Strategy Document have been prepared to address these issues.</p>
<p>Mr Stephen Courcier, Carter</p>	<p>Observations</p>	<p>CSPA/1083</p>	<p>The Council's LDF needs to be in full conformity with a range of national planning policy considerations and our response to</p>	<p>Comments noted. Every effort will be taken to ensure the document is understandable. A</p>

<p>Jonas LLP on behalf of C Carver Esq and Family,</p>		<p>the Consultation is informed by these. As such it is considered appropriate to briefly provide commentary on elements of this policy and guidance as these will inform our representations to the Draft Core Strategy (Preferred Approach) and Allocations Development Plan Document ? Potential Sites Consultation. Government Guidance 2.2 PPS12 (June 2008) seeks to simplify the consultation stages and the tests of soundness. It requires the Core Strategy:</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 evidence of community and stakeholder input; <p>and</p> <ul style="list-style-type: none"> ? to demonstrate coherence with other plans, strategies and spending programmes. <p>Overall the Core Strategy should reflect the needs and requirements specific to the District and be flexible to changing circumstances. PPS12 is clear that the Policies of the Core Strategy should clearly be tied to a vision. The vision should in turn be developed following; ?analysis of the characteristic of the area and its constituent parts and the key issues and challenges facing them? (paragraph 4.2). The policies and objectives of the Core Strategy should work towards the fulfilment of this vision having regard to the full range of considerations and indicators. Flexibility is considered central to the development of a robust Core Strategy capable of adjusting to accommodate changing circumstances. This is clearly stated in paragraph 4.46 which states ?a strategy is unlikely to be effective if it cannot deal with changing circumstances? and specific to the identification of housing land paragraph 4.14 states that the Core Strategy; ?should not need to be updated simply because there has been a change in the housing numbers in the regional spatial strategy?. Deliverability of the preferred strategy is held to be foremost in the development of a successful Core Strategy. Paragraph 4.45 of the Core Strategy states how Core Strategies must ?show how the vision, objectives and strategy for the area will be delivered and by whom, and when. This includes making it clear how infrastructure which</p>	<p>glossary has been added to the Draft Strategy Document and a Summary Document has been prepared.</p> <p>Noted. The Further Consultation and Draft Strategy Document have been prepared to address these issues.</p>
--	--	--	--

		<p>is needed to support the strategy will be provided and ensuring that what is in the plan is consistent with other relevant plans and strategies relating to adjoining areas?.</p> <p>Consistent with this requirement the Core Strategy is also required to be supported by evidence of what physical, social and green infrastructure is needed to enable development (para 4.8 and 4.9). Information should look at who will provide infrastructure and when it will be provided, working towards the aspiration of aligning infrastructure provision with the deliver of the Core Strategy.</p> <p>Normally sites should not be identified within the Core Strategy. However the Core Strategy can be used to identify areas of search or strategic sites where they are central to the attainment of the strategy, require a long lead in and should be related to key infrastructure improvements. Favoured sites should be shown to best help to achieve the vision identified (para. 4.6 and 4.7).</p> <p>The Core Strategy is also required to be supported by evidence of what physical, social and green infrastructure is needed to enable development (para 4.8 and 4.9). Information should look at who will provide infrastructure and when it will be provided, working towards the aspiration of aligning infrastructure provision with the delivery of the Core Strategy.</p> <p>At submission, the Inspector will first test to ensure that the DPDs meets the legal requirements under s20(5)(a) before moving on to test for soundness. One of the key considerations in determining legal compliance of the Allocations document is its in conformity with the Core Strategy. Paragraph 5.1 of PPS12 states that councils should consider the chain of conformity in preparing lower tier DPDs.</p> <p>In regards to the second test we have some concerns about the legibility of the Core Strategy document, which is excessively lengthy at 258 pages. We realise that the next document will not include all the material in this document but that the Council should explore ways of making the publication DPD more concise and user friendly.</p> <p>PPS12 paragraph 5.2 (3) requires DPD's to be justified, effective and consistent with national policy. It is important that you consider how the next step in the evolution of these both</p>	
--	--	--	--

		<p>the Core Strategy and Allocations and how they will be developed to the publication of a sound DPD, in line with these principles.</p> <p>(i) Justified- PPS12 states that to be 'justified' a DPD needs to be founded on a robust and credible evidence base and be the most appropriate strategy when considered against reasonable alternatives. At publication you will need to be able to demonstrate that you have looked sufficiently at alternative options, including options within the main strategic choices in the Core Strategy.</p> <p>(ii) Effective - PPS12 states that DPDs should be effective. The strategies and sites must be deliverable with evidence of that the necessary infrastructure is deliverable, and there are no regulatory or national planning barriers. They should also be consistent with the strategies of neighbouring authorities, flexible and able to be monitored.</p> <p>(iii) Consistency with National Policy. The policies in the DPD should be consistent with national policy, unless there is clear and convincing reasoning to justify a departure.</p> <p>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 rural settings and environments.</p> <p>Government Guidance relating to Housing is contained in PPS3 Housing (June 2010). This provides a step change in how housing delivery is to be managed. It states that housing delivery should reflect a more responsive approach to land supply so that delivery is assured. 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>Overall the emphasis is upon delivering high quality 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. To the individual this</p>	
--	--	--	--

		<p>means 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>Turning to planning for economic development, the most recent version of the PPS4 Planning for Sustainable Economic Growth (December 2009) represents a shift towards a more positive and holistic interpretation of sustainable economic growth. It emphasises the Government's overarching objective is sustainable economic growth and one of main objectives for planning is to build prosperous communities by improving the economic performance of cities, towns, regions, sub-regions and local areas, both urban and rural. It also seeks to raise the quality of life and the environment in rural areas by promoting a thriving, inclusive and locally distinctive rural communities whilst continuing to protect the open countryside for all.</p> <p>PPS7 Sustainable Rural Development emphasises the importance of the planning system facilitating the creation of a sustainable rural economy which provides homes and jobs in a manner that does not prejudice the visual amenity and characteristics of the landscape. Consistent with this approach paragraph 5 states that local authorities should set out their criteria for permitting provision of community facilities and commercial proposals. Paragraph 8 of PPS7 states that 'it is essential that local authorities meet the housing requirements of those in rural areas'. While prioritising the focusing of housing to existing villages, it also advocates support for some new housing to meet needs elsewhere including in the smallest of villages.</p> <p>The Government commissioned a report The Taylor Review of Rural Economy and Affordable Housing with the view to investigating ways through which the planning system can contribute to the creation of a mixed, thriving and sustainable countryside. Following this in March 2009 the Government published its response. Both documents are important considerations for the East Riding which is an overwhelmingly rural district.</p> <p>Both the Taylor Review and the Government's response make clear that promoting the needs of rural communities and businesses should be at the forefront of the planning system; often rural communities are overlooked by a 'one-size-fits-all'</p>	
--	--	--	--

		<p>approach that fails to be properly rural proofed. Reflecting this the review encourages the delivery of housing and affordable housing in rural communities and states more should be done to support economic development of rural areas. In effect it supports the creation of a 'Living Working Countryside' reflective of its historic usage and states that planning policy and decision making should work harder in striving to achieve and not hinder this aspiration.</p> <p>Particular support is given to innovative approaches to delivering economic development and affordable homes in sustainable locations. Local Authorities are urged to be active housing enablers, proactive and innovative ways to encourage the delivery of affordable housing.</p> <p>Regional Policy</p> <p>Regional policy was adopted in May 2008 in the form of the Regional Spatial Strategy: The Yorkshire and Humber Plan. This document provides the overarching framework which the Core Strategy must be in broad conformity.</p> <p>On 27 May 2010 the Secretary of State for Communities and Local Government wrote to Council leaders highlighting the Coalition Government's commitment to rapidly abolish Regional Strategies (RS) and return decision making powers on housing and planning to local councils. On this basis, the proposed revocation of Regional Strategies is a Government commitment that the Council should take into account as a material consideration.</p> <p>Further guidance was issued in a letter to HM Treasury and a Ministerial Written Statement dated 6 July 2010. This guidance suggests that revocation of the RS is not a signal for plan making authorities (LPA's) to stop preparation of their LDF and component DPDs. It goes on to suggest that the LPA's should continue using the evidence base prepared in support of the RS and maintain a five year supply based upon locally determined housing requirements.</p> <p>In the absence of RSS, we consider that East Riding Council should take the opportunity to reconsider the amount of housing and economic activity in the lower order settlements. The Regional Spatial Strategy was unduly restrictive of development within the countryside which failed to recognise the valuable and critical role the rural economy and</p>	
--	--	--	--

			<p>settlements play in districts such as the East Riding. We consider that in the absence of RSS and following from the guidance contained within the Conservative Party's publication 'Open Source Planning' that the importance and focus should be centred on the role of the localised housing and economic sub-areas, such as York and Leeds sub-areas rather than the artificial focus on Hull and Beverley. There needs to be greater awareness of trans-boundary relationships between settlements such as North Cave and York economic sub-area.</p> <p>Conclusions</p> <p>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 evidence of community and stakeholder input; and ? To demonstrate coherence with other plans, strategies and spending programmes. <p>Across all tiers of planning policy a number of key themes permeate, foremost amongst which is manifested in providing everyone with a decent home, building prosperous communities and raising the quality of life and environment in both urban and rural areas.</p>	
Mr Stephen Courcier, Carter Jonas LLP on behalf of C Carver Esq and Family,	Object	CSPA/1093	<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 preferred approach is presented. Nevertheless there remain significant parts of the document we consider to be in need of modification.</p> <p>The most fundamental points which emerge within these representations is our view that the Council needs to take a more flexible and less prescriptive approach. In particular towards the scale of development in lower order settlements to best reflect the characteristics of the District and to promote its sustainable development in a fashion consistent with current and emerging Government Guidance, in particular the abolition of RSS and the new localism agenda.</p> <p>Our response has been framed having regard to the guidance of PPS12 that policy should be:</p> <ul style="list-style-type: none"> ? Clear, flexible and deliverable; ? Underpinned and supported by a robust evidence base; 	Support and comments welcomed

			<p>? Supported by evidence of community and stakeholder input; and</p> <p>? Coherence with other plans, strategies and spending programmes</p> <p>? Most appropriate strategy when considered against the reasonable alternatives.</p>	
<p>Mr Stephen Courcier, Carter Jonas LLP on behalf of Mr Huddleston,</p>	<p>Observations</p>	<p>CSPA/1152</p>	<p>The Council's LDF needs to be in full conformity with a range of national planning policy considerations and our response to the Consultation is informed by these. As such it is considered appropriate to briefly provide commentary on elements of this policy and guidance as these will inform our representations to the Draft Core Strategy (Preferred Approach) and Allocations Development Plan Document ? Potential Sites Consultation. Government Guidance 2.2 PPS12 (June 2008) seeks to simplify the consultation stages and the tests of soundness. It requires the Core Strategy:</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 evidence of community and stakeholder input; and ? to demonstrate coherence with other plans, strategies and spending programmes. <p>Overall the Core Strategy should reflect the needs and requirements specific to the District and be flexible to changing circumstances.</p> <p>PPS12 is clear that the Policies of the Core Strategy should clearly be tied to a vision. The vision should in turn be developed following; ?analysis of the characteristic of the area and its constituent parts and the key issues and challenges facing them? (paragraph 4.2). The policies and objectives of the Core Strategy should work towards the fulfilment of this vision having regard to the full range of considerations and indicators. Flexibility is considered central to the development of a robust Core Strategy capable of adjusting to accommodate changing circumstances. This is clearly stated in paragraph 4.46 which states ?a strategy is unlikely to be effective if it cannot deal with changing circumstances? and specific to the identification of housing land paragraph 4.14 states that the Core Strategy; ?should not need to be updated simply because there has been a change in the housing numbers in the</p>	<p>Comments noted. Noted. The Further Consultation and Draft Strategy Document have been prepared to address these issues.</p> <p>The Draft Strategy Document reflects the policies contained in the National Planning Policy Framework.</p>

		<p>regional spatial strategy?.</p> <p>Deliverability of the preferred strategy is held to be foremost in the development of a successful Core Strategy. Paragraph 4.45 of the Core Strategy states how Core Strategies must show how the vision, objectives and strategy for the area will be delivered and by whom, and when. This includes making it clear how infrastructure which is needed to support the strategy will be provided and ensuring that what is in the plan is consistent with other relevant plans and strategies relating to adjoining areas?.</p> <p>Consistent with this requirement the Core Strategy is also required to be supported by evidence of what physical, social and green infrastructure is needed to enable development (para 4.8 and 4.9). Information should look at who will provide infrastructure and when it will be provided, working towards the aspiration of aligning infrastructure provision with the deliver of the Core Strategy.</p> <p>Normally sites should not be identified within the Core Strategy. However the Core Strategy can be used to identify areas of search or strategic sites where they are central to the attainment of the strategy, require a long lead in and should be related to key infrastructure improvements. Favoured sites should be shown to best help to achieve the vision identified (para. 4.6 and 4.7).</p> <p>The Core Strategy is also required to be supported by evidence of what physical, social and green infrastructure is needed to enable development (para 4.8 and 4.9). Information should look at who will provide infrastructure and when it will be provided, working towards the aspiration of aligning infrastructure provision with the delivery of the Core Strategy.</p> <p>At submission, the Inspector will first test to ensure that the DPDs meets the legal requirements under s20(5)(a) before moving on to test for soundness. One of the key considerations in determining legal compliance of the Allocations document is its in conformity with the Core Strategy. Paragraph 5.1 of PPS12 states that councils should consider the chain of conformity in preparing lower tier DPDs.</p> <p>In regards to the second test we have some concerns about the legibility of the Core Strategy document, which is</p>	
--	--	--	--

		<p>excessively lengthy at 258 pages. We realise that the next document will not include all the material in this document but that the Council should explore ways of making the publication DPD more concise and user friendly. .</p> <p>PPS12 paragraph 5.2 (3) requires DPD's to be justified, effective and consistent with national policy. It is important that you consider how the next step in the evolution of these both the Core Strategy and Allocations and how they will be developed to the publication of a sound DPD, in line with these principles.</p> <p>(i) Justified- PPS12 states that to be 'justified' a DPD needs to be founded on a robust and credible evidence base and be the most appropriate strategy when considered against reasonable alternatives. At publication you will need to be able to demonstrate that you have looked sufficiently at alternative options, including options within the main strategic choices in the Core Strategy.</p> <p>(ii) Effective - PPS12 states that DPDs should be effective. The strategies and sites must be deliverable with evidence of that the necessary infrastructure is deliverable, and there are no regulatory or national planning barriers. They should also be consistent with the strategies of neighbouring authorities, flexible and able to be monitored.</p> <p>(iii) Consistency with National Policy. The policies in the DPD should be consistent with national policy, unless there is clear and convincing reasoning to justify a departure.</p> <p>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 rural settings and environments. Government Guidance relating to Housing is contained in PPS3 Housing (June 2010). This provides a step change in how housing delivery is to be managed. It states that housing delivery should reflect a more responsive approach to land supply so that delivery is assured. 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</p>	
--	--	---	--

		<p>necessary housing in the correct locations.</p> <p>Overall the emphasis is upon delivering high quality 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. To the individual this means 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>Turning to planning for economic development, the most recent version of the PPS4 Planning for Sustainable Economic Growth represents a shift towards a more positive and holistic interpretation of sustainable economic growth. It emphasises the Government's overarching objective is sustainable economic growth and one of main objectives for planning is to build prosperous communities by improving the economic performance of cities, towns, regions, sub-regions and local areas, both urban and rural. It also seeks to raise the quality of life and the environment in rural areas by promoting a thriving, inclusive and locally distinctive rural communities whilst continuing to protect the open countryside for all.</p> <p>PPS7 Sustainable Rural Development emphasises the importance of the planning system facilitating the creation of a sustainable rural economy which provides homes and jobs in a manner that does not prejudice the visual amenity and characteristics of the landscape. Consistent with this approach paragraph 5 states that local authorities should set out their criteria for permitting provision of community facilities and commercial proposals. Paragraph 8 of PPS7 states that 'it is essential that local authorities meet the housing requirements of those in rural areas'. While prioritising the focusing of housing to existing villages, it also advocates support for some new housing to meet needs elsewhere including in the smallest of villages.</p> <p>The Government commissioned a report The Taylor Review of Rural Economy and Affordable Housing with the view to investigating ways through which the planning system can contribute the creation of a mixed, thriving and sustainable countryside. Following this in March 2009 the Government</p>	
--	--	--	--

		<p>published its response. Both documents are important considerations for East Riding which is an overwhelmingly rural district.</p> <p>Both the Taylor Review and the Government's response makes clear that promoting the needs of rural communities should be at the forefront of the planning system; often rural communities are overlooked by a one-size fits all approach that fails to be properly rural proofed. Reflecting this the review encourages the delivery of housing and affordable housing in rural communities and states more should be done to support economic development of rural areas. In effect it supports the creation of a 'Living Working Countryside' reflective of its historic usage and states that planning policy and decision making should work harder in striving to achieve and not hinder this aspiration.</p> <p>Particular support is given to innovative approaches to delivering economic development and affordable homes in sustainable locations. Local Authorities are urged to be active housing enablers, proactive and innovative ways to encourage the delivery of affordable housing.</p> <p>Regional Policy</p> <p>Regional policy was adopted in May 2008 in the form of the Regional Spatial Strategy: The Yorkshire and Humber Plan. This document provides the overarching framework which the Core Strategy must be in broad conformity.</p> <p>On 27 May 2010 the Rt Hon Eric Pickles MP, Secretary of State for Communities and Local Government, wrote to Council leaders highlighting the Coalition Government's commitment to rapidly abolish Regional Strategies (RS) and return decision making powers on housing and planning to local councils. On this basis, the proposed revocation of Regional Strategies is a Government commitment that the Council should take into account as a material consideration. Further guidance was issued in a letter to HM Treasury and a Ministerial Written Statement dated 6 July 2010. This guidance suggests that revocation of the RS is not a signal for plan making authorities (LPA's) to stop preparation of their LDF and component DPDs. It goes on to suggest that the LPA's should continue using the evidence base prepared in support of the RS and maintain a five year supply</p>	
--	--	--	--

			<p>based upon locally determined housing requirements. In the absence of RSS, we consider that East Riding Council should take the opportunity to reconsider the amount of housing and economic activity in the lower order settlements. The Regional Spatial Strategy was unduly restrictive of development within the countryside which failed to recognise the valuable and critical role the rural economy and settlements play in districts such as East Riding. We consider that in the absence of RSS and following from the guidance contained within the Conservation Party's publication 'Open Source Planning' that the importance and focus should be centred on the role of the localised housing and economic sub-areas, such as York and Leeds sub-areas rather than the artificial focus on Hull and Beverley. There needs to be greater awareness of trans-boundary relationships between such as Holme on Spalding Moor and York.</p> <p>Conclusions 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 evidence of community and stakeholder input; <p>and</p> <ul style="list-style-type: none"> ? To demonstrate coherence with other plans, strategies and spending programmes. <p>Across all tiers of planning policy a number of key themes permeate, foremost amongst which is manifested in providing everyone with a decent home, building prosperous communities and raising the quality of life and environment in both within urban and rural areas.</p>	
<p>Mr Stephen Courcier, Carter Jonas LLP on behalf of Mr Huddleston,</p>	<p>Observations</p>	<p>CSPA/1153</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 preferred approach is presented. Nevertheless the remains significant parts of the document we consider to be in need of modification. The most fundamental points which emerge within these representations is our view that in the Council needs to take a more flexible and less prescriptive approach towards the scale of development in lower order settlements to best reflect the</p>	<p>Support and comments welcomed</p>

			<p>characteristics of the District and to promote its sustainable development in a fashion consistent with current and emerging Government Guidance, in particular the abolition of RSS and the new localism agenda.</p> <p>Our response has been framed having regard to the guidance of PPS12 and policy should be:</p> <ul style="list-style-type: none"> ? Clear, flexible and deliverable; ? Underpinned and supported by a robust evidence base; ? Supported by evidence of community and stakeholder input; and ? Coherence with other plans, strategies and spending programmes ? Most appropriate strategy when considered against the reasonable alternatives. 	
Dacres Commercial, Dacres Commercial on behalf of Redrow Homes (Yorkshire) Ltd	Observations	CSPA/I401	<p>On the 6th July 2010 the Secretary of State announced the revocation of Regional Strategies with immediate effect. As such, and as confirmed within Guidance released by DCLG the Regional Spatial Strategy for Yorkshire and the Humber no longer forms part of the statutory development plan for the East Riding.</p> <p>This announcement clearly has implications for the preparation of the Local Development Framework for the East Riding although Guidance makes clear that this process should continue to development LDF core strategies and other DPDS under the framework of current national planning policy guidance. It also indicates that the evidence base compiled in the preparation of the revoked Strategies may remain relevant. In the light of the revocation Authorities may decide to review and/or revise their emerging LDF policies.</p> <p>The timing of the announcement is unfortunate in the context of the current consultation exercise on the Preferred Approach Core strategy which draws upon the RSS spatial approach in developing policy for the East Riding. Policy within RSS was however based upon, and in conformity with national guidance and the broad evidence base which supported this policy remains relevant.</p>	Noted. The Further Consultation and Draft Strategy Document have been prepared to address these issues.
Mark Jones, Barton Willmore on behalf of Wykeland Group Limited	Observations	CSPA/I565	<p>Evidence Base</p> <p>It would be useful in this section, if the document could set out the baseline studies it is referring to that comprise its Core Strategy evidence base.</p>	The studies that comprise the evidence base are listed at the end of each chapter. Deliverability of sites is tested annually through our Strategic Housing Land

			<p>We are concerned that the document is not founded on a robust evidence base, and in some cases the existing evidence points to a different policy formulation approach. We amplify these comments under the relevant response to each question below. However we wish to make a number of general observations at this stage:</p> <p>We understand that the evidence base is still evolving and in some cases is incomplete.</p> <p>The Core Strategy seeks to allocate (identify) a number of 'Strategic Sites'. These are liberally referenced throughout the document, yet the document has little information in respect of their deliverability.</p> <p>In respect of the parallel consultation on sites, the Council has yet to assess the capacity of its identified sites to deliver the suggested employment and/or housing growth studied. These sites need to be 'tested' in respect of their ability to provide such growth; and</p> <p>There appears to be a conflict in the Plan between the forms of growth in the major Haltemprice settlements, compared with any detailed analysis as to the capacity and impact of existing facilities and services in these settlements that such growth will actually have. This may result in an undeliverable strategy overall.</p>	Availability Assessment.
Dacres Commercial, Dacres Commercial on behalf of Mr J R Everatt,	Observations	CSPA/1424	<p>On the 6th July 2010 the Secretary of State announced the revocation of Regional Strategies with immediate effect. As such, and as confirmed within Guidance released by DCLG the Regional Spatial Strategy for Yorkshire and the Humber no longer forms part of the statutory development plan for the East Riding.</p> <p>This announcement clearly has implications for the preparation of the Local Development Framework for the East Riding although Guidance makes clear that this process should continue to development LDF core strategies and other DPDS under the framework of current national planning policy guidance. It also indicates that the evidence base compiled in the preparation of the revoked Strategies may remain relevant. In the light of the revocation Authorities may decide to review and/or revise their emerging LDF policies.</p> <p>The timing of the announcement is unfortunate in the context of the current consultation exercise on the Preferred</p>	<p>Comments noted.</p> <p>The Government is now revoking Regional Strategies through the Localism Act. A commencement order needs to be made by the Secretary of State before Regional Strategies can be revoked and are no longer considered part of the statutory development plan.</p>

			Approach Core strategy which draws upon the RSS spatial approach in developing policy for the East Riding. Policy within RSS was however based upon, and in conformity with national guidance and the broad evidence base which supported this policy remains relevant.	
Dacres Commercial, Dacres Commercial on behalf of Redrow Homes (Yorkshire) Ltd	Observations	CSPA/1415	On the 6th July 2010 the Secretary of State announced the revocation of Regional Strategies with immediate effect. As such, and as confirmed within Guidance released by DCLG the Regional Spatial Strategy for Yorkshire and the Humber no longer forms part of the statutory development plan for the East Riding. This announcement clearly has implications for the preparation of the Local Development Framework for the East Riding although Guidance makes clear that this process should continue to development LDF core strategies and other DPDS under the framework of current national planning policy guidance. It also indicates that the evidence base compiled in the preparation of the revoked Strategies may remain relevant. In the light of the revocation Authorities may decide to review and/or revise their emerging LDF policies. The timing of the announcement is unfortunate in the context of the current consultation exercise on the Preferred Approach Core strategy which draws upon the RSS spatial approach in developing policy for the East Riding. Policy within RSS was however based upon, and in conformity with national guidance and the broad evidence base which supported this policy remains relevant.	Comments noted. The Government is now revoking Regional Strategies through the Localism Act. A commencement order needs to be made by the Secretary of State before regional strategies can be revoked and are no longer considered part of the statutory development plan.
Mark Jones, Barton Willmore on behalf of Wykeland Group Limited	Observations	CSPA/1563	The introductory section of the -draft document identifies the role of the Core Strategy Document at paragraphs 1.1 and 1.2 and the relationship between other DPD's at section 1.3. We note that the Council is not intending to produce a separate development control policy document and that many of the detailed policies are included within this Core Strategy. The impact of this is that the Core Strategy has now become a rather lengthy and cumbersome document stretching to some 258 pages. We are concerned that the enlarged scope of the document has shifted the focus away from the spatial strategy which guides place, shaping and delivery, and instead, has resulted in a lengthy 'development control tool'. It would therefore be useful to clarify the relationship between Development Plan Documents at paragraph 1.3 and note which	Comments noted. The document was split into two themes: The Spatial Strategy and Development Policies.

			document is intending to cover what policy aspects. One suggestion would be to 'split' the document into 2 parts with part a) providing the overall spatial themes and the Core Strategy requirements, with part b) providing detailed development control policies.	
Mr Dan Mitchell, Barton Willmore on behalf of Stuart Evison,	Observations	CSPA/I631	We note that the Core Strategy includes the proposed Development Policies (Chapters 7 ? 10). Thus, we would suggest that the document is re-titled accordingly to represent this. For example 'Preferred Approach Core Strategy and Development Policies Document'. Also given the Council's proposed approach in combining both the Core Strategy and Development Policies into one large document, it would be most helpful to divide the document in two clear parts for ease of reference such as follows:- Part 1 ? Core Strategy Part 2 ? Development Policies	Comments noted. The document was split into two themes: The Spatial Strategy and Development Policies.
Mr Dan Mitchell, Barton Willmore on behalf of Stuart Evison,	Observations	CSPA/I633	Abolition of the Yorkshire and Humber Regional Spatial Strategy As of the 6th July 2010, the Yorkshire and Humber Regional Spatial Strategy (RSS) was revoked by the Secretary of State. The Council has based its Core Strategy and other LDF documents on RSS and its own evidence. We understand that the Inspectorate is currently writing to various LPAs where the revocation of RSS may impact on the preparation (and Examination) of DPDs. In the case of this Core Strategy, the Council will need to review whether the abolishment of RSS materially affects the overall approach to development. We note that the current consultation may be impacted by these changes and in this regard we reserve the right to submit further representations in due course. We do, however, note that ERYC is keen to progress its LDF based on the strategy of focusing the majority of development to Central Sub Area and the part of East Riding that adjoins the Regional City of Hull. Indeed the central sub-area is an area which he?s been under the most pressure for development given its proximity to the economic drivers in the sub region and the housing market. We would suggest that the evidence base prepared to date supports the Council?s overall approach to growth in respect of land for new homes and jobs as set out in this document. It is worth noting that the most recent CLG	Comments noted. The Draft Strategy Document reflects the policies contained in the National Planning Policy Framework. Significant elements of the Local Plan evidence base have now been published including an Affordable Housing Viability Assessment and a Strategic Housing Market Assessment. The impact of this new evidence has been considered through the Further Consultation Core Strategy and Draft Strategy Document.

			household population growth figures for Yorkshire and the Humber suggest that higher levels of growth could be required.	
Nathan Smith, Barton Willmore on behalf of Galliford Try (Strategic) Land, Galliford Try (Strategic) Land	Observations	CSPA/1592	<p>Before responding to the questions posed in the CSPA, Galliford set out some overarching comments on the overall structure and content of the document.</p> <p>What is the purpose of Core Strategy?</p> <p>Paragraph 4.1 of PPS12 (Local Spatial Planning) sets out that a core strategy should include the following:</p> <ol style="list-style-type: none"> 1. an overall vision which sets out how the area and the places within it should develop; 2. strategic objectives for the area focussing on the key issues to be addressed; 3. a delivery strategy for achieving these objectives. This should set out how much development is intended to happen where, when, and by what means it will be delivered. Locations for strategic development should be indicated on a key diagram; and 4. clear arrangements for managing and monitoring the delivery of the strategy.? <p>In terms of spatial planning PPS12 sets out that it is about place shaping and delivery. We note that the delivery strategy is central. It needs to show how the objectives will be delivered, and that the core strategy makes clear spatial choices about where developments should go in broad terms.</p> <p>The East Riding Core Strategy Preferred Approach Title of Document</p> <p>We note that this document also includes development policies. Therefore we would recommend that the document is amended to reflect this.</p> <p>Amount and structure of CSPA</p> <p>Galliford notes that at some 258 pages, the Core Strategy is a significant document to take on board and review. This does appear to be contrary to the need to provide a new streamlined and accessible planning document, which sets out clear strategic objectives for the East Riding.</p> <p>We therefore believe the overall objectives of the document are 'lost' within the significant amount of text and therefore believe the whole document could be restructured to provide a clear overarching objectives, with strategic policies in 'part 1', followed by part 2, which deals with more detailed</p>	<p>Comments noted.</p> <p>Every effort is being made to make sure the document is as short as possible without compromising necessary details.</p> <p>Development Policies support the Spatial Strategy by setting out general principles for the sustainable development of the East Riding.</p>

			<p>development policies, which could include (but not be restricted to as follows):</p> <p>Part 1 ? The spatial approach for East Riding</p> <ul style="list-style-type: none"> ? Key Diagram ? Delivering Sustainable Patterns of Development ? Development in the countryside ? Distribution of economic development ? Town Centres list ? Strategic transport routes ? Sub area policies for: <ul style="list-style-type: none"> ? Beverley and Central ? Bridlington Coastal ? Driffield & Wolds ? Goole and Humberhead Levels ? Holderness & Southern Coastal ? Vale of York <p>Part 2 ? Development Policies</p> <ul style="list-style-type: none"> ? Housing parameters (including issues such as density and recognising local character) ? Affordable Housing ? Gypsies and Travellers ? Employment ? Retail development parameters ? Design parameters (including guidance on what development proposals would be assessed against) <ul style="list-style-type: none"> ? Landscape ? Heritage ? Biodiversity and Ecology ? Flood Risk ? Renewable Energy ? Minerals ? Waste Management ? Community Facilities ? Open Space ? Planning Obligations 	
Mr Neil Manock, Neil Manock on behalf of Lady Miller,	Observations	CSPA/1725	There is reference throughout the Core Strategy to the Regional Spatial Strategy for Yorkshire and the Humber. However, RSSs were revoked by a letter to Chief Planning	<p>Comments noted.</p> <p>The Government is now revoking Regional</p>

			Officers dated 6 July 2010 from the Chief Planner, Department for Communities and Local Government. Proposed amendment: Delete reference to RSS in Core Strategy.	Strategies through the Localism Act. A commencement order needs to be made by the Secretary of State before regional strategies can be revoked and are no longer considered part of the statutory development plan.
Mr Neil Manock, Neil Manock on behalf of Lady Miller,	Observations	CSPA/1726	National planning guidance in PPS12 states that in order to be sound, Core Strategy documents must be justified, effective and consistent with national planning policy guidance. In particular, the Core Strategy must be founded on robust and credible evidence and the most appropriate strategy when considered against alternatives. Advice in PPS12 states that core strategies must be deliverable, flexible and capable of being monitored. There follows our representations on the soundness of the Core Strategy taking into account its compliance with regional and national planning policies.	Comments noted.
Mr Dan Mitchell, Barton Willmore on behalf of Mr Paul Butler, Barratt and David Wilson Homes	Observations	CSPA/1832	As a general observation, we note that the Core Strategy as drafted is a very lengthy document-and we would suggest that the Council endeavours to streamline this document.	Every effort is being made to make sure the document is as short as possible without compromising necessary details.
Mr Dan Mitchell, Barton Willmore on behalf of Mr Paul Butler, Barratt and David Wilson Homes	Observations	CSPA/1833	We also note that the Core Strategy also includes the proposed Development Policies (Chapters 7 - 10). Thus, we would suggest that the document is re-titled accordingly to represent this. For example 'Preferred Approach Core Strategy and Development Policies Document'. Also given the Council's proposed approach in combining both the Core Strategy and Development Policies into one large document, it would be most helpful to divide the document in two clear parts for ease of reference such as follows: Part 1 - Core Strategy Part 2 - Development Policies	Comments noted. Development Policies support the Spatial Strategy by setting out general principles for the sustainable development of the East Riding.
Mr John Brown, East Riding of Yorkshire Rural Partnership	Observations	CSPA/1899	The LDF might reflect upon the emerging national campaign, 'Piece by Piece' which envisages an increasing cadre of volunteers, trained and alert enough to raise appropriate concerns beyond simple 'Nimbyism'. Piece by Piece will be mentioned again in a later section.	Comments noted.
Mr John Brown, East	Observations	CSPA/1900	The LDF in its final form should attempt to guard against	Comments noted.

Riding of Yorkshire Rural Partnership			unintended consequences. For example, nationally efforts to reduce pressure of house building on 'greenfield' sites had the consequence of facilitating house building in gardens of existing properties. Nationally, in recent years one in four of new houses were built in gardens. A feature much noted by Howden residents.	
Mr Alex Codd, Hull City Council	Observations	CSPA/2052	The consultation on the Core Strategy commenced prior to the abolition of the RSS, however it is essential East Riding of Yorkshire council reviews their approach to ensure they have a robust local evidence to support the direction of the plan.	Comments noted.
Nathan Smith, Barton Willmore on behalf of Kayterm Plc	Observations	CSPA/1748	<p>Our Client is concerned about the overall structure of the Core Strategy. It is considered that in the context of the intention for Local Development Framework's (LDFs) to comprise a portfolio of short, streamlined documents, the Core Strategy at some 258 pages long, is far too lengthy. It is understood that as East Riding are not producing a separate development control policies document, the Core Strategy should cover these issues. However, our Client believes that the document could be reorganised and streamlined to make the document into a much more readable and useable format. We therefore suggest the following changes to the Core Strategy:</p> <ul style="list-style-type: none"> ◆ Move all of the alternative approaches for each policy to an Appendix; ◆ Split the Core Strategy into two sections as follows: <ul style="list-style-type: none"> (i) Spatial/Strategic Policies to do with spatial hierarchy, location of development and sub-area policies; and (ii) Development Control Policies on a thematic basis. ◆ Cutting down on the length of the policies (this will be helped by splitting the document as above); and ◆ Move the key diagram to the front of the document within the Spatial/Strategic Policies section. <p>In addition to the above, we consider that much of the information in the Introduction to the Core Strategy is unnecessary and does not need to be in the document at all. For example, paragraphs 1.3 to 1.5 merely explain the purpose and format of the LDF for East Riding. This contains generic information that is freely available on the Communities and</p>	Comments noted. Every effort is being made to make sure the document is as short as possible without compromising necessary details.

		<p>Local Government website as well as on the East Riding website. The information that is specific to East Riding is addressed in the Local Development Scheme (LDS) and there is no need for it to be repeated here. Our Client therefore recommends that these paragraphs be removed from the Core Strategy.</p> <p>Similarly, Figure I is unnecessary and based on the arguments above, should already be contained within the LDS. Therefore we recommend that Figure I be removed from the Core Strategy.</p> <p>It is also considered that the box entitled 'How can I get involved?' is unnecessary within the context of the Core Strategy. It is administrative information which can easily be found on the Council's website and was included on the consultation letter which was sent out on 4th May 2010. It adds no value to the Core Strategy itself such that we consider that this box should be removed from the Core Strategy.</p> <p>We note that following each of the preferred policies set out in the Core Strategy, there is a question asking whether that policy is the most appropriate. Our Client believes that as this document is at the Preferred Approach stage, these questions are vague and more reminiscent of those found in an Issues and Options type document. At this stage, the Core Strategy should be seeking slightly more detailed comments than whether a particular approach is the most appropriate given that this document is the result of consultation on the most appropriate way forwards based on the Issues identified and Options put forward for consideration at the earlier Issues and Options stage. Our Client therefore recommends that the questions are removed and comments on any part of the Core Strategy are invited instead.</p> <p>It is also considered that the document is too 'wordy' and lacks clear diagrams that explain the spatial context of the Core Strategy. The diagrams that are included in the document (Figures 3, 4 and 5), whilst useful, are not particularly clear. This is best demonstrated by Figure 4, which aims to illustrate the RSS sub-areas in the context of the East Riding. The similarity in the colours used for the various sub-areas as well as the similarity in symbols for the various cities and towns,</p>	
--	--	---	--

			<p>makes this Figure particularly difficult to 'read'. Our Client believes that by amending these figures to include a wider variety of colours, shading and symbols would make the Figures in the Core Strategy easier to understand.</p> <p>Furthermore, our Client believes that there are not enough diagrams used in the Core Strategy to explain the spatial context of the East Riding. We note that the Sustainability Assessment of the Core Strategy contains useful diagrams, relating to such issues as flood risk and Green Belt that would be more useful within the Core Strategy itself. On the basis that 'a picture is worth thousand words' it would then be possible to reduce the overall length of the Core Strategy to something more manageable. Our Client therefore considers that the Core Strategy should include the relevant diagrams from the Sustainability Appraisal.</p>	
Mr John Brown, East Riding of Yorkshire Rural Partnership	Support	CSPA/1916	<p>The Partnership recognises that the LDF is a framework for policies and practices. As such it is vital in planning for the future for the East Riding and carries the whole hearted support of the Partnership.</p> <p>The Partnership further recognises that the hopes and aspirations contained within the LDF can actually only be brought to fruition in many cases by the actions and activities of the local Authority departments, elected members, credible Partnerships and many other associated organisations.</p>	Support and comments noted.
Mr Mike Dando, Yorkshire Planning Aid on behalf of Pensioners Action Group East Riding	Object	CSPA/2207	<p>Key Issues</p> <ul style="list-style-type: none"> Shops and Services Community Facilities and Open Space Tourism and Leisure Transport High Quality Design Renewable and Low Carbon Energy Flood Risk and Coastal Erosion 	Noted.
Key Diagram				
Consultee	Nature Of Response:	Comment ID	Response	Officer Comments
Mr Dan Mitchell, Barton Willmore on behalf of Mr Paul	Object	CSPA/164	Also, we would suggest that the key diagram at the back of the document is provided upfront in the document, such as in chapter 2.	Comment noted.

Butler, Barratt and David Wilson Homes				
Mr T Ross, Hull and East Riding Rail Users Association	Support	CSPA/2060	We support the inclusion of the proposed Beverley to York railway line in the Key Diagram	Support noted.
Mr T Ross, Hull and East Riding Rail Users Association	Support	CSPA/1030	We support the inclusion of the proposed Beverley to York railway line in the Key Diagram	Support noted.
Mr A J Williams, Advance Land and Planning Limited on behalf of Leonard Cheshire Disability (LCD)	Object	CSPA/822	The Key Diagram should be amended to identify North Ferriby as Rural Service Centre or Supporting Village.	Comment noted.
Mark Jones, Barton Willmore on behalf of Wykeland Group Limited	Observations	CSPA/1591	<p>Page 222 provides the Council's Key Diagram. There are a number of observations in relation to this document as follows. Firstly, the key diagram should be produced in A3 format (landscape) to enable it to be pulled out and viewed on a wider basis. The East Riding is a large area and the key diagram needs to reflect this in as large a format as possible. It may also be appropriate, in the context of East Riding, to consider providing a key diagram for each Sub Area given that a number of the Sub Areas (particularly Beverley and Central sub area) are particularly 'congested' in its identification of key spatial themes. Secondly, the key diagram clearly identifies the tension in the major Haltemprice settlements between the areas of high landscape value, the growth opportunities and the links to the regional centre of Hull. These are key issues which are not necessarily reflected in the Council's vision. The key diagram should also provide numerical references to each of the Strategic Employment Sites identified in the Plan.</p>	Comments noted.
Mr Dan Mitchell, Barton Willmore on behalf of Stuart Evison,	Observations	CSPA/1637	We would suggest that the 'Key Diagram' at the back of the document is provided upfront in the document, such as in Chapter 2. This should also be produced on A3 pull out format to provide as big a Key Diagram as possible.	Comment noted.

Appendices

Contents

Appendix A..... 1
 Appendix B..... 2

Appendix A				
Consultee	Nature Of Response:	Comment ID	Response	Officer Comments
M Mr T Ross, Hull and East Riding Rail Users Association	Observations	CSPA/1031	Under 'Transport', regarding the main rail links, 'Hull - Doncaster' should read 'Hull - (Goole) - Doncaster/Sheffield'. 'Hull - London' should read 'Hull - (Selby) - Doncaster - London'. 'Hull - Selby/York' should be added (the main link towards the north and Scotland). Together with Hull - Leeds/Manchester and Hull - Scarborough, the number of 'main rail links' quoted should therefore be increased from three to four.	Comments noted. These points have been reflected on in preparing the Draft Strategy Document.
Mr T Ross, Hull and East Riding Rail Users Association	Observations	CSPA/2061	Under 'Transport', regarding the main rail links, 'Hull - Doncaster' should read 'Hull - (Goole) - Doncaster/Sheffield'. 'Hull - London' should read 'Hull - (Selby) - Doncaster - London'. 'Hull - Selby/York' should be added (the main link towards the north and Scotland). Together with Hull - Leeds/Manchester and Hull - Scarborough, the number of 'main rail links' quoted should	Comments noted. These points have been reflected on in preparing the Draft Strategy Document.

			therefore be increased from three to four.	
Mr Dave Evans, Humber Archaeology Partnership	Other	CSPA/2283	Environment - The last bullet point needs revising and expanding. Firstly, the numbers of the different categories of designated heritage assets need expanding (see elsewhere in this response for the current figures); secondly, the registered battlefield and the one protected wreck have been omitted. Thirdly, whilst this concentrates exclusively on the Built Heritage and the Designated Heritage Assets, there is no mention of the buried Historic Environment, or of the large numbers of significant but undesignated heritage assets within the area - nor of the nationally significant, but undesignated archaeological landscapes. We have an amazing wealth of archaeology within the Plan Area, with over 20,000 sites of all periods from the Palaeolithic to the Cold War.	Comments noted. These points have been reflected on in preparing the Draft Strategy Document.
Appendix B				
Consultee	Nature Of Response:	Comment ID	Response	Officer Comments
Ian Smith, English Heritage Yorkshire Region	Observations	CSPA/472	Beverley: Fourth bullet-point - Mention should also be made to the significance of the Minster in terms of views towards the settlement Bridlington: First bullet-point - The Old Town has a distinctive character but it is not that of a 'definitive seaside resort'. This needs amending.	Comments noted. Reference to the importance of these features/areas are included in the sub area policies of the Draft Strategy Document.
Mr Dave Evans, Humber Archaeology Partnership	Other	CSPA/2284	Beverley - Environment - In the fourth bullet-point, mention should also be made to the significance of the Minster and St Mary's church, in terms of views towards the settlement	Comments noted. Reference to these features is set out in Policy A1 of the Draft Strategy Document.

Mr Dave Evans, Humber Archaeology Partnership	Other	CSPA/2285	Bridlington - Environment - The Old Town has a distinctive character, but it is not that of a 'definitive seaside resort'. This needs amending.	Comments noted. Reference to the Old Town is set out in Policy A2 of the Draft Strategy Document.
--	-------	-----------	---	---