

Chapter I - Introduction

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Paragraph 1.3

Consultee	Nature Of Response:	Comment ID	Response	Officer Comments
Mr Adrian James, Barton Willmore on behalf of Lord Feoffees	Object	CSPA/271	<p>The Lords have concerns about the detrimental impact on their land interests of the emerging proposals, and also the wider viability and business plans of the scheme.</p> <p>The Lords Feoffees and Assistants of the Manor of Bridlington consider that the approach of not considering sites in the Allocations DPD is unsound as it will not allow for a proper comparative assessment of sites within the town centre, the rest of the town and the wider Sub Area. The effect of not allocating sites within the Allocations DPD also means that the planning framework for the AAP will only be provided by the Core Startegy DPD. As a consequence, the Core Strategy DPD contains a level of detail that is not appropriate. Finally, the different DPD's are all at a different stage of preparation such that the AAP (which is the most advanced) is determining the content of the Core Startegy DPD rather than, as required by PPS 12, the Core Startegy DPD providing the framework for the more detailed policies of the AAP. This reversal of proper procedure places both document at a risk of being found 'unsound'.</p>	Comments noted. The Bridlington Town Centre AAP has been found sound at an Examination in Public and is soon to be adopted by the council.
Mr Adrian James, Barton Willmore on behalf of Lord Feoffees	Object	CSPA/502	<p>Finally, the Lords consider that the Allocations DPD should allocate land in and around Bridlington to deliver the vision, objectives and planning policies set out in the Core Strategy and to address the needs of the local community. To delegate the allocation of sites to the Town Centre AAP is not a sound approach.</p>	Comments noted. The Draft Allocations Document considers sites in and around Bridlington outside of the AAP area. The Bridlington Town Centre AAP has been found sound at an Examination in Public and is soon to be adopted by the council.
Ms Nichola Traverse-Healy, Barton Willmore on behalf of The Bridlington Harbour Commissioners	Object	CSPA/1877	<p>The Commissioners note that the Allocations DPD will not allocate any sites within the area covered by the Bridlington Town Centre, Area Action Plan' (AAP) and, therefore, have no comments on the content of this DPD. However, the Commissioners consider that the approach of not considering sites in the Allocations DPD is unsound as it will not allow for a proper comparative assessment of sites within the town and the wider Sub Area. The effect of not allocating sites within the Allocations DPD also means that the planning framework for</p>	Comments noted. The Draft Allocations Document considers sites in and around Bridlington outside of the AAP area. The Bridlington Town Centre AAP has been found sound at an Examination in Public and is soon to be adopted by the council.

			the AAP is only provided by the Core Strategy DPD; in consequence, the Core Strategy DPD contains a level of detail that is not appropriate. Finally, the different DPD's are all at a different stage of preparation such that the AAP (which is most advanced) is determining the content of the Core Strategy DPD rather than, as required by PPS 12, the Core Strategy DPD providing the framework for the more detailed policies of the AAP.	
Mr John Brown, East Riding of Yorkshire Rural Partnership	Observations	CSPA/1917	Would it be possible through the LDF to develop and make known a set of criteria by which the eventual choices of land for housing development are made. There is, of course an element of chance in land being put forward as being available for housing but there are also attributes of suitability which existing residents should be able to ascertain. Criteria would need to be couched in terms of general principles to allay concerns in the minds of landowners if they were clearly site specific.	Comments noted. A Site Assessment Methodology has been employed to assess sites as part of the Allocations Document process.

Paragraph 1.4

Consultee	Nature Of Response:	Comment ID	Response	Officer Comments
Mr David Renwick, East Riding Of Yorkshire Council	Observations	CSPA/978	We would be keen to see the potential for a biodiversity and a coastal change management SPD mentioned in this Section alongside affordable housing, which is already mentioned. In addition it may also be worthwhile to flag up the need for a green infrastructure and open space SPD. We feel that it would be useful to set out the intended suite of SPD that the LDF needs to effectively deliver the general core strategy policies on the ground and to properly inform planning officers and developers.	Comments noted. References to SPDs are made throughout the Draft Strategy Document.

Paragraph 1.5

Consultee	Nature Of Response:	Comment ID	Response	Officer Comments
Mr Alastair McIntyre, Government Office for Yorkshire and the Humber	Observations	CSPA/146	The Core Strategy will need to be clear and precise about exactly which saved policies are being superseded by the CS (page 4, paragraph 1.5 refers). These superseded policies will need to be specified in the Core Strategy document.	Comments noted. A list of replaced policies is set out in the appendices of the Draft Strategy Document.

Paragraph 1.6

Consultee	Nature Of Response:	Comment ID	Response	Officer Comments
Mr David Renwick, East Riding Of Yorkshire Council	Observations	CSPA/979	Has the new 2010 update of the SCP been considered when referencing it in the LDF? This Section makes the point that the LDF aims to help deliver the vision set out in that document, but the correct SCP needs to be referenced? This is of general relevance but of particular interest to us as the 2010 update has more mentions of climate change, resource depletion and biodiversity 'issues' than previous editions.	Comments noted. The Draft Strategy Document refers to the latest Community Plan at the time of preparation.

Paragraph 1.9

Consultee	Nature Of Response:	Comment ID	Response	Officer Comments
Mr David Renwick, East Riding Of Yorkshire Council	Observations	CSPA/980	Whilst the summary of the HRA document in this Section accurately summarises the findings of the HRA document we feel that cumulative effects and disturbance impacts on Natura 2000 sites could have been underplayed in the HRA document. This may need to be picked up in more detail in the HRA document when the final document is submitted to Natural England. Please change 'likely significant effects upon internationally important nature conservation interests' to 'likely significant effects upon designated European Natura 2000 sites'.	Comments noted. These comments have been considered through the preparation of the latest HRA.
Mr David Renwick, East Riding Of Yorkshire Council	Observations	CSPA/982	The summary of the SA could be a little longer and be more about what it actually says rather than what it is. For example, the summary under Section 9.6 - 9.8 on p121 of the May 2010 SA Main Report could be used for such a summary. This is important as 'significant negative effects' were identified for sustainability objectives that we would be interested in, such as reducing levels of atmospheric green house gasses (GHGs) (SA12), air quality (SA7) and biodiversity (SA15), amongst others. Is there a formal mechanism for showing how, or which of, the issues mentioned and recommendations made in the SA are / have been considered or taken forward and how they will be minimised by the LDF core strategy policies and any future SPD? We have considered Appendices G, H and I for the SA and the Recommendations/Mitigation column in making this	Comments noted. Many of the SA's recommendations are already addressed through other policies within the plan.

			comment.	
Mr David Renwick, East Riding Of Yorkshire Council	Observations	CSPA/983	From the May 2010 SA assessment, it is difficult to see how the LDF is an accurate and balanced expression of the SCP. How does it meet ALL of the 'six key sustainability principles' (p6 of the SCP) or 'balance and integrate the social, economic and environmental components of East Riding communities', 'meet the needs of existing and future generations' or 'respect the needs of other communities in the wider region or internationally' (p6) given the 'significant negative effects' which the SA identified (as mentioned above)? A little more explanation of the linkages between the LDF core strategy policies and the SCP sustainability principles would help address this.	Comments noted. The Draft Strategy Document makes reference to links with the latest Community Plan. As the plan concerns development, there will naturally be some negative effects. The SA has sought to understand whether the approaches taken are the most sustainable of the options available.

Paragraph 1.14

Consultee	Nature Of Response:	Comment ID	Response	Officer Comments
Mr Alastair McIntyre, Government Office for Yorkshire and the Humber	Observations	CSPA/147	<p>The evidence base underpinning the Core Strategy is progressing with several key components still in preparation, including:</p> <ul style="list-style-type: none"> - Infrastructure Study - Affordable Housing Viability Study - Sub Regional Energy and Targets Study update - Open Space and Playing Pitch Strategies - Level 2 SFRA for Goole - Second Shoreline Management Plan <p>We note your comments that these will inform the continued preparation of the Core Strategy (page 5, paragraph 1.14). Timescales are not always set out but clearly it will be important that these elements of the evidence base are available to inform and influence the future development of the Core Strategy. It is worth bearing in mind that if the Core Strategy changes significantly as a result of the evidence base updates, the opportunity for comments to be made on those changes by individuals or organisations becomes very limited. As you recognise (paragraph 1.15), the next proposed stage of your Core Strategy's development, Publication, is not a consultation stage but the opportunity to offer representations on soundness only. Furthermore, since Publication is meant to</p>	Comments noted. The Further Consultation and Draft Strategy Document have been prepared with reference to the latest evidence available at the time. These have provided additional opportunities to make comments on all aspects of the Strategy.

			<p>be the final, ie sound and complete to your satisfaction, version of the document, any substantive changes post publication may mean that it may not be possible to progress to submission. Of course this becomes an issue the more the evidence suggests a need to change the preferred approach.</p>	
<p>Mr David Renwick, East Riding Of Yorkshire Council</p>	<p>Observations</p>	<p>CSPA/985</p>	<p>The evidence base could be included as a separate Appendix to the core strategy document to show what documents / resources have been drawn upon. Currently there is an attempt to reference evidence base documents in Appendix A (key characteristics), but this does not cover all documents. On checking the evidence base we feel the following documents are missing or have been incorrectly referenced: East Riding of Yorkshire Biodiversity Action Plan (in final stages of development), East Riding of Yorkshire Broad Habitat and Local Wildlife Sites Survey (ongoing), East Riding Coastal Change Pathfinder, East Riding of Yorkshire Council Climate Change Strategy (in draft - in the process of going out for public consultation), Humber Management Scheme Document, Flamborough Management Plan (by the Flamborough Management Scheme), National Habitat Inventories (woodland is included but there are others), Regional Habitat Networks, Regional Biodiversity Opportunity Areas, Regional Priority Landscape Areas for Biodiversity.</p> <p>Some elements of the evidence base that have been included in the separate document have not been referenced in the appropriate section of the core strategy document. For example the coastal monitoring programme and the second generation Shoreline Management Plan (SMP2) (currently in final stages of development) are not mentioned in the evidence box on Page 190 for managing environmental hazards. It is good to see the draft Climate Change Strategy referenced in section 9, 'A High Quality Environment', but as the issues contained in the strategy are by definition cross cutting it would good to also see it referenced in other areas - for example under section 8, 'A Prosperous Economy'.</p> <p>In addition the contact details for our team are incorrect in the evidence base document e.g. Biodiversity Officer. The contact for Ancient Woodland should be someone within Natural England, as they own the data for this layer, as well as the other national habitat inventories which should also be part of the</p>	<p>Comments noted. A separate document detailing aspects of the Evidence Base is available on the Council's website.</p>

			evidence base. The SMP2 (currently in final stages of development) will likely be finished by the end of 2010 not 2009. Reference is made to the 1999 draft Local Biodiversity Action Plan (LBAP) that is now defunct; reference should be made to the new LBAP currently in the final stages of development (see above). The Phase I habitat survey is mentioned, but it would be better to say the East Riding of Yorkshire Broad Habitat and Local Wildlife Sites Survey (see above). Catchment Flood Risk Management Plans (CFMPs) are mentioned in the evidence base but not in the Core Strategy Document. Contact details for the Humber Estuary SMP (should be Humber Estuary Flood Risk Management Strategy) are incorrect; this should be Philip Winn at the Environment Agency (EA). The contact for Verge Nature Reserves (VNRs) should be the biodiversity officer, Vaughan Grantham not Alan Hemmingway.	
Mr Dan Mitchell, Barton Willmore on behalf of Stuart Evison,	Object	CSPA/1632	<p>Evidence Base</p> <p>Paragraph 1.14 makes it clear that there is still work to be done on the Evidence Base and that this will inform the continued preparation of the Core Strategy. Paragraph 4.37 of Planning Policy Statement 12 on Local Spatial Planning (PPS12) states that it is essential that core strategies are based on thorough evidence.</p> <p>We note that the following evidence base is outstanding:-</p> <ul style="list-style-type: none"> - Affordable Housing Viability Assessment; and - East Riding Infrastructure Study. <p>The Affordable Housing Viability Assessment is fundamental to soundness. It will inform the Core Strategy by setting out an appropriate framework regarding affordable housing. In particular, proposed Core Strategy Policy HBHM2 can not be finalised until this work has been undertaken.</p> <p>In light of the above, our client is concerned that Core Strategy policies are being formulated without a robust evidence base in place.</p>	Comments noted. The Further Consultation and Draft Strategy Documents have provided additional opportunities to comment on the document with reference to the latest available evidence.
Mr Dan Mitchell, Barton Willmore on behalf of Mr Paul Butler, Barratt and David Wilson Homes	Object	CSPA/1834	<p>Paragraph 1.14 makes it clear that there is still work to be done on the Evidence Base and that this will inform the continued preparation of the Core Strategy. Paragraph 4.37 of Planning Policy Statement 12 on Local Spatial Planning (PPS12) states that it is essential that core strategies are based on thorough evidence.</p>	Comments noted. The Further Consultation and Draft Strategy Documents have provided additional opportunities to comment on the document with reference to the latest available evidence.

			<p>Our client is therefore concerned generally in respect of the formulation of the preferred approach document, given that the Local Development Framework (LDF) evidence base is still evolving.</p> <p>We note that the following evidence base is outstanding:</p> <ul style="list-style-type: none"> - Affordable Housing Viability Assessment - East Riding Infrastructure Study - Level 2 Strategic Flood Risk Assessment (SFRA) for Goole <p>The Affordable Housing Viability Assessment is fundamental to soundness. It will inform the Core Strategy by setting out an appropriate framework regarding affordable housing. In particular, proposed Core Strategy Policy HBHM2 can not be finalised until this work has been undertaken.</p> <p>Paragraph 5.17 acknowledges that proposed policy SS4 will be revised if any significant issues arise once the East Riding Infrastructure Study and the Level 2 SFRA for Goole has been completed.</p> <p>The East Riding Infrastructure Study will also inform proposed Core Strategy Policies SHC3 and SHC4 and will consider the capacity of existing infrastructure and the additional infrastructure required to facilitate future development up to 2026, sources of funding available and the gaps in funding. This will then have an impact on suggested Developer Contributions and will have implications for the proposed Core Strategy and Development Control Policies.</p> <p>In light of the above, our client is concerned that Core Strategy policies are being formulated without a robust evidence base in place.</p>	
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How can I get involved?

Consultee	Nature Of Response:	Comment ID	Response	Officer Comments
Mr David Price,	Object	CSPA/3	<p>Living in a rural community such as Melbourne, this document is not readily available, it's only by chance that I was aware that there was a consultation process that started on May 4th.. thus the vast majority of this community has already 'lost' a month of consultation time...surely the Parish council should have posted a notice outside the school and outside the village hall.</p> <p>What assurances can be given to the people of Melbourne that</p>	<p>Comments noted. Information regarding the Local Plan has been published in East Riding News which is delivered to every home in the authority area. Several press articles have also been published. Town and Parish councils are constantly engaged with the Local Plan process and many have taken it</p>

			they will be made aware of this proposal?	upon themselves to do additional consultation. The council maintains a contact list to inform those of new Local Plan document. Those who have made comments in the past and who register will be automatically made aware of new consultation documents.
Consultee Unknown,	Observations	CSPA/385	Worthwhile consultation process - Cottingham TH 21/6/2010	Comments noted.
Mr Colin Butterfield,	Object	CSPA/688	<p>Finally, the tight timeframe (12 July) for responding to these proposals does not give time for full and frank consultation with residents to take place. It would seem that a two stage consultation process is required:</p> <p>Stage 1- to determine the views of residents on the proposed developments (and significant number of properties proposed).</p> <p>Stage 2- to determine, should any planning permission be granted, where the most appropriate site/s would be to minimise the detrimental effect these proposals would have on this beautiful rural village.</p> <p>In summary: we strongly object to the proposals for further development. If plans were to go ahead- only Wilberfoss 6 would be appropriate.</p>	Comments noted. The consultation period extended beyond the normal 6 week period and comments are always accepted. The preparation of the document is undertaken in stages – in an identical process to the one you describe.

Chapter 2 – Key Spatial Issues

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Key Spatial Issues				
Consultee	Nature Of Response:	Comment ID	Response	Officer Comments
Mark Jones, Barton Willmore on behalf of Wykeland Group Limited	Object	CSPA/2308	<p>Chapters 2 and 3 of the Draft Core Strategy set the key spatial issues and the Vision and Objectives. In reality, there is very little difference between these two chapters as both aim to provide an overview of the key spatial issues affecting the authority. We suggest that chapters 2 and 3 become combined into one simplified, streamlined, spatial vision section. In this context, we would also request that</p> <p>In respect of chapter 2, this chapter generally provides the wider context to East Riding and identifies a number of pressures affecting the district. Figures 3, 4 and 5 are useful to identify the general extent of the East Riding's administrative boundaries and regional context, but provide very little information as to the local distinctiveness of the East Riding. The images are also blurred.</p> <p>In response to chapter 2, we request that the Council reduces the wider context references in this section and focuses more on the importance of the East Riding local character. We would suggest strengthening the focus around the relationship with Hull and the role that the Haltemprice settlements play, which is clearly important for future settlement growth strategy within the district. We would suggest that the section should identify the Sub Areas the Council is promoting as part of its overall settlement strategy but which also provide the local character for East Riding.</p> <p>Figures 3, 4 and 5 provide low resolution "fuzzy" diagrams and appear to replicate what is on the key diagram, currently comprising page 222 of the document.</p> <p>We would suggest that this section overall could be condensed and integrated within section 3 of the Core Strategy Document.</p>	Chapter 2 sets out the key spatial issues for the East Riding and aims to provide context to the LDF/Local Plan. Chapter 3 then sets out the overall vision for the area and strategic objectives which focus on the key issues to be addressed. As the chapters have different, albeit related, roles it is considered appropriate that they are separate.

Mr Dan Mitchell, Barton Willmore on behalf of Mr Paul Butler, Barratt and David Wilson Homes	Object	CSPA/165	It only addresses a limited number of areas/issues on pages 11 to 14.	Noted.
Mr Dan Mitchell, Barton Willmore on behalf of Mr Paul Butler, Barratt and David Wilson Homes	Object	CSPA/166	3) There is considerable background information including reference to the past history/characteristics of the East Riding of Yorkshire area. However, as drafts the section is not clear on the spatial priorities. 4) We consider that a key objective for a Core Strategy is to identify what is needed for the East Riding of Yorkshire as a place and where, when and how it will be delivered. The Core Strategy therefore needs to be more specific in terms of the spatial planning priorities for the East Riding of Yorkshire.	Noted.
Mr Dan Mitchell, Barton Willmore on behalf of Mr Paul Butler, Barratt and David Wilson Homes		CSPA/167		Noted.
Mr John Holmes, Hull Forward	Support	CSPA/952	- We support the sentiments expressed in this chapter and throughout the document noting the strong relationship with Hull, the need for both authorities' Core Strategies to be supportive, and reinforcing the need for development in the East Riding to recognise, support and complement the role of Hull as a Regional City. - The Economic growth section (2.22-2.25) could refer to the East Riding's key economic areas/markerts (Hull, York, Bridlington) and the work underway through the joint economic assessment process to understand the characteristics and dynamics of these markets, which will have an implication on future strategy/policy.	Noted. Support welcomed.
Mr David Renwick, East Riding Of Yorkshire Council	Observations	CSPA/977	The Introduction and Key Spatial Issues Sections of the document do not seem to be a fair summary of the rest of the document. Key issues covered within the various Sections do not seem to be picked up or flagged in this Section, but are covered later on. Readers who do not delve into the detail may miss the fact that the Local Development Framework (LDF) has dealt with their concerns. For example in Section 2 we feel that environmental issues are key spatial issues including	Noted.

			biodiversity, flood risk and coastal erosion as well as climate change and green infrastructure yet these are largely missed out. For the sake of consistency it would be good to see Sections 1 and 2 reflect the rest of the content of the document.	
Mr Dan Mitchell, Barton Willmore on behalf of Stuart Evison,	Object	CSPA/1640	<p>The purpose of Chapter 2 of the Core Strategy is to identify the key spatial issues for the East Riding of Yorkshire. However, it only addresses a limited number of areas/issues on pages 11 to 14.</p> <p>There is considerable background information including reference to the past history/characteristics of the East Riding of Yorkshire area. However, as drafted the section is not clear on the spatial priorities.</p> <p>We consider that a key objective for a Core Strategy is to identify what is needed for the East Riding of Yorkshire as a place and where, when and how it will be delivered. The Core Strategy therefore needs to be more specific in terms of the spatial planning priorities for the East Riding of Yorkshire. This should also identify how East Riding and Hull are working together on sub regional basis.</p>	Noted.
Mr Dan Mitchell, Barton Willmore on behalf of Mr Paul Butler, Barratt and David Wilson Homes	Object	CSPA/1836	<p>The purpose of Chapter 2 of the Core Strategy is to identify the key spatial issues for the East Riding of Yorkshire. However, it only addresses a limited number of areas/issues on pages 11 to 14.</p> <p>There is considerable background information including reference to the past history/characteristics of the East Riding of Yorkshire area. However, as drafted the section is not clear on the spatial priorities.</p> <p>We consider that a key objective for a Core Strategy is to identify what is needed for the East Riding of Yorkshire as a place and where, when and how it will be delivered. The Core Strategy therefore needs to be more specific in terms of the spatial planning priorities for the East Riding of Yorkshire.</p>	Noted.
Mr Mike Dando, Yorkshire Planning Aid on behalf of Pensioners Action Group East Riding	Other	CSPA/2194	<p>The big issues are:</p> <p>Hospitals: lack of services</p> <p>Transport</p>	Noted.

East Riding of Yorkshire in context

Consultee	Nature Of Response:	Comment ID	Response	Officer Comments
Ian Smith, English Heritage Yorkshire Region	Observations	CSPA/414	<p>Whilst it is appreciated that this is a broad introductory section, it provides virtually no information about what the East Riding is like as a place and what makes it different from other parts of the Region. Such information would help provide a context for the subsequent sections of the Plan.</p> <p>In terms of the historic environment, the following are of note:-</p> <ul style="list-style-type: none"> ◆ The East Riding has second largest number of designated assets in the Region and has more Conservation Areas than any other authority. It also has the highest total of high-Grade Listed Buildings in the Region ◆ The archaeological landscapes of the Yorkshire Wolds are of national significance. This extensive prehistoric ritual landscape has an exceptional concentration of archaeological features including numerous Neolithic and Bronze Age ritual and funerary sites, Iron Age remains (notably the dense distribution of vehicle burials and linear earthworks relating to the Arras culture - of particularly importance given the relative paucity of Iron Age funerary sites in the rest of the UK). It also has a number of Deserted Medieval Villages. ◆ The long coastline of the East Riding has, throughout history, made it vulnerable to attack from the sea. As a result there is a network of historic coastal defences. These range from Iron Age promontory forts, such as Danes? Dyke which bisects Flamborough Head, to 19th and 20th century gun emplacements, including the heavy anti-aircraft batteries installed during World War 2?s ?Operation Diver,? designed to protect the UK from Nazi V-I flying bombs launched from the continent; ◆ The East Riding is notable for the number of medieval market towns which retain significant portions of their 	Noted.

historic form. Beverley, Driffild and Bridlington are fine examples, while Hedon and Howden represent planned medieval burghs, created by the Normans in the 11th century;

- ◆ The East Riding has a number of fine medieval churches, particularly Beverley Minster (widely regarded as the most architecturally impressive ecclesiastical building in England without cathedral status and considered to be one of the most beautiful Gothic buildings in Europe) and the Church of St Augustine, Hedon.
- ◆ Church spires and towers form an important aspect of landscapes of the Wolds and, especially, the low-lying Holderness plain. In the latter, the two principal churches are St Patrick's Church, Patrington (known locally as the 'Queen of Holderness') and St Augustine in Hedon (the 'King of Holderness');
- ◆ 18th and 19th century windmills create important landmarks and are a unique aspect of the character of the low-lying Holderness plain and Humberhead Levels;
- ◆ The area has significant wetland archaeological remains:
 - The peat areas of Goole Moors form part of the largest remnant raised mire in England and have high palaeoenvironmental and find preservation potential;
 - The Humber Estuary contains wellpreserved archaeological remains, potentially of national importance and has yielded many wellpreserved finds, including logboats.
- ◆ Landed estates ? while not individually large ? are a prominent feature of East Yorkshire and have an important influence on the landscape, introducing an element of formality through policy woodlands, planned fields and country houses;
- ◆ The Humber Estuary road bridge is an important landmark and an exemplar of late 20th century engineering. It is the

			<p>fifth longest single-span suspension bridge in the world, and was the longest until 1998;</p> <p>◆ In Goole, the two remaining boat hoists (built in about 1862 and Listed Grade II*) to transfer coal from canal barges into seagoing vessels (known as "Tom Pudding Hoists") are of a type found nowhere else in the country. Suggested amendment: Amend accordingly.</p>	
Mr John Pilgrim, Yorkshire Forward	Support	CSPA/423	The maps and diagrams which are used to set the East Riding Core Strategy into context are welcomed. Figure 3, which shows the regional context and links, is particularly useful in demonstrating the significant links with the East Riding has with surrounding districts and city regions. We also particularly welcome the emphasis given, at the outset of the strategy, to the importance of the relationship between the Core Strategies of East Riding and of Hull. It will be important that the links between the strategies are maintained, and developed, as you both move towards publication and submission.	Noted. Support welcomed.
Mr G E Wright,	Object	CSPA/927	The relationship between the East Riding and the City of Hull and the City of York is inappropriately conceived.	Noted. The text reflects the policy approaches agreed through the RSS which was part of the development plan at the time of writing.
Mr Alex Codd, Hull City Council	Support	CSPA/884	Hull City Council welcomes the opportunity to comment on the East Riding of Yorkshire Council's Preferred Approach Core Strategy. We are particularly supportive that the Core Strategy emphasises the strong relationship between Hull and the East Riding of Yorkshire, and that it acknowledges the need for Hull to be the prime focus for development and regeneration activity. In addition, the recognition of the need to support each other's Core Strategies is also welcomed ensuring, as it does, that Hull's stepped growth approach to regeneration is supported.	Noted. Support welcomed.
Mr David Renwick, East Riding Of Yorkshire Council	Observations	CSPA/988	This section sets out the linkages with other areas in terms of regeneration and economic development but misses other important linkages for example in terms of biodiversity, habitat networks and coastal erosion, which may influence the planning system. Also see the comment above regarding this point.	Noted.
Mr Dave Evans, Humber	Observations	CSPA/2237	The East Riding Evidence of Yorkshire in context (pp 10-	Noted.

Archaeology Partnership			<p>11)</p> <p>What has been missing from the document so far, and from this chapter and section is any detailed appreciation of what the East Riding is like as a place and what makes it different from other parts of the Region; this is surely what is anticipated in response to Policy HE3 of PPS 5?. Such information would help provide a context for the subsequent sections of the Plan.</p> <p>In terms of the Historic Environment, the following are of note:-</p> <ul style="list-style-type: none"> - The East Riding has second largest number of designated heritage assets in the Region, and has more Conservation Areas than any other authority. It also has the highest total of high-Grade Listed Buildings in the Region (i.e. LB1 and LB2*). - The archaeological landscapes of the Yorkshire Wolds are of national significance; this led to it being selected as one of the very first areas in England to be studied under the National Mapping Programme. This extensive prehistoric ritual landscape has an exceptional concentration of archaeological features, including numerous Neolithic and Bronze Age ritual and funerary sites, Iron Age remains (notably the dense distribution of burials and linear earthworks relating to the Arras culture - of particularly importance given the relative paucity of Iron Age funerary sites in the rest of the UK). It also has a number of nationally important Anglo-Saxon burial sites, and several Deserted Villages. - The wetland landscapes of the Holderness Plain, the Hull Valley, the Vale of York, the Humberhead Levels, and the area between the Ancholme and Lower Trent Valleys are major parts of the nationally important Humber Wetlands - the remaining section being the Lincolnshire Outmarsh; this was one of the only four major areas of surviving wetland in England, and was subject to an English Heritage-funded National Mapping Programme project.. All of these areas have rich waterlogged deposits which favour the survival of organic structures and finds, and also have a high potential for the preservation of plant and insect remains which can highlight the area's past environment and development; 	
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		<p>amongst the many structures which have been uncovered within these areas have been over 60 log-boats (many of which are prehistoric), wooden track-ways, bog bodies, buried Roman roads, and numerous early settlements and salt-making sites. In addition, the peat areas of Goole Moors form part of the largest remnant raised mire in England and have high palaeoenvironmental and find preservation potential;</p> <ul style="list-style-type: none">- The long coastline of the East Riding has, throughout history, made it both vulnerable to attack from the sea, and also attractive as a target for early settlement by invading groups of people. As a result, there is a network of historic coastal defences of many different periods; these range from Iron Age promontory forts, such as Danes? Dyke which bisects Flamborough Head, to 19th and 20th century forts and gun emplacements, including Fort Paull, and the heavy anti-aircraft batteries installed during World War 2's 'Operation Diver', designed to protect the UK from Nazi V-I flying bombs launched from the continent. But, both this coast and the Humber Estuary also made this area a natural centre for both fishing and maritime trade; as such, the coast and the Estuary have hosted some of the busiest sea-lanes on the whole of the east coast of England for the last 5,000 years. This has left a rich legacy of ports, landing places, ship- and boat-building and repair facilities, slipways, groins, fish-traps, and shipwrecks.- The East Riding is notable for the number of medieval market towns which retain significant portions of their historic form. Beverley, Driffield and Bridlington are fine examples of larger boroughs, whilst Cottingham, Hedon, Howden, Market Weighton, Pocklington and Snaith are good examples of smaller medieval towns. One of the characteristics of the historic East Riding was that its market centres during the Middle Ages were much smaller than in many parts of England; nevertheless, elements of their street patterns and historic fabric survive in more than 20 such settlements today.- The East Riding boasts a fine collection of medieval churches. Beverley has two of the very best: Beverley Minster (widely regarded as the most architecturally	
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		<p>impressive ecclesiastical building in England without cathedral status and considered to be one of the most beautiful Gothic buildings in Europe), and the church of St Mary in Beverley (considered to be the finest parish church in England). Other notably fine churches include Bridlington Priory, St Patrick at Patrington (one of the best Decorated style churches in the area), and St Augustine at Skirlaugh (probably the finest Perpendicular style building in the area), and Howden Minster; but, there are many others of real merit.</p> <ul style="list-style-type: none">- Church spires and towers form an important aspect of landscapes of the Wolds and, especially, the low-lying Holderness plain. In the latter, the two principal churches are St Patrick's Church, Patrington (known locally as the 'Queen of Holderness') and St Augustine in Hedon (the 'King of Holderness').- 18th and 19th century windmills create important landmarks and are a unique aspect of the character of the low-lying Holderness plain and Humberhead Levels.- Landed estates - while not individually large, are a prominent feature of East Yorkshire and have an important influence on the landscape, introducing an element of formality through woodlands, deer parks, planned fields and country houses. Whilst some of these are designated heritage assets, many more elements are undesignated; but all contribute to the character of the area.- The Humber Estuary road bridge is an important landmark and an exemplar of late 20th century engineering. It is the fifth longest single-span suspension bridge in the world, and was the longest until 1998. Though a relatively modern structure, it continues to span the Humber Gap, which has been a major topographical feature in the landscape since pre-glacial times: this is the point where an ice wedge blocked the waters building up in what would become Lake Humber. It was when this ice wedge gave way, some 13,000 years ago, that the whole of the lower reaches of the Humber Estuary were formed ? beginning the process of creating the East Riding which we would recognise today.- In Goole, the two remaining boat hoists (built in about	
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			<p>1862 and Listed Grade II*) to transfer coal from canal barges into seagoing vessels (known as "Tom Pudding Hoists") are of a type found nowhere else in the country. It would make this a much better-balanced document if these aspects were brought out in this document; whilst you might argue that some of the detail might be more appropriate in Chapter 9 (the Environment), there needs to be some recognition of the contribution that this sense of place and heritage contributes to what makes the East Riding special - its local distinctiveness. I notice that the term 'heritage' is used in many places throughout this document, but is rarely defined or elaborated upon; and, in many places, there seems to be a tacit assumption that this is synonymous with its Built Heritage. But, that is only a part of what the area has to offer.</p>	
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Figure 3

Consultee	Nature Of Response:	Comment ID	Response	Officer Comments
Mr Dan Mitchell, Barton Willmore on behalf of Mr Paul Butler, Barratt and David Wilson Homes	Object	CSPA/161	We consider that the diagram which forms figure 3 is not very clear and could be significantly improved to ensure that they are meaningful diagrams which contribute to and identify the key spatial issues for East Riding.	Noted.
Mr Pete Sulley, Barton Willmore on behalf of Central Land Holdings, Central Land Holdings	Observations	CSPA/1709	<p>It is recognised in paragraph 2.6 that, because of the strong relationship between Hull and East Riding, their respective Core Strategies need to be supportive of each other's ambitions and the policy approaches within them need to be coherent, This is particularly prevalent in relation to the Major Haltemprice Settlements but is applicable to all settlements, especially those within the Hull Housing Market Area (HMA) as defined in the RSS, in which Beverley is located.</p> <p>Paragraph 2.7 goes on to refer to Hull's strategy of adopting a 'Stepped Growth' approach. Barton Willmore has significant reservations about this approach and made representations on the Hull Core Strategy on this matter. These representations are attached, ad verbatim, as Appendix 2 to this document.</p> <p>In summary, the representations to the 'Stepped Growth'</p>	Noted. The relationship between Hull and the East Riding is considered in more detail in other chapters.

		<p>approach advocated in the 'Hull Development Framework - Core Strategy Emerging Preferred Approach: February 2010' centre around a number of matters. These comprise:</p> <ul style="list-style-type: none">- Backloading the delivery of housing towards the end of the Plan period, in direct conflict with advice contained within PPS3;- Misapplication of the principle of the 'Stepped Growth' approach as advocated in the RSS;- A restrictive approach seeking to constrain growth, especially in the short term, which runs counter to the positive and progressive Spatial Vision and Strategic Objectives highlighted in the Hull Core Strategy; and- Basing the 'Stepped Growth' approach largely, if not primarily, on the Housing Market Assessment and its update, as opposed to the range of evidence and debate that the RSS strategy was based upon. <p>Whilst the East Riding Core Strategy is not advocating, or indeed suggesting, such a flawed approach, it is evident that the two strategies are aligned. Further, Policy SS4 states that there will be increases and decreases of development rates over the Plan period in certain areas. Therefore, care must be taken so that the increase and decrease of development rates in Policy SS4 are not wholly aligned with the overly restrictive 'Stepped Growth' approach proposed in the Hull Core Strategy, which significantly constrains development in the short term with a view to 'clawing back' the shortfall towards the end of the Plan period. Moreover, this 'clawback' is also at build rates that Hull has not come anywhere near to achieving over the last 10 years, and this does not take into account demolitions which have, in some instances, resulted in a net loss to the housing stock.</p> <p>As such there is a very real concern that Hull will simply fall too far behind in their housing trajectory and will not be able to catch up. East Riding could also fall into the same trap if their strategy is too closely aligned with that of Hull's.</p> <p>As mentioned above, this is particularly prevalent in relation to the Hull HMA. The Major Haltemprice Settlements and Beverley (all of which lie within the Hull</p>	
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		<p>HMA), along with the three other Principal Towns, are the primary focuses for development within East Riding. There is also an express need to develop the M62/A63 corridor for employment uses, a significant part of which lies within the Hull HMA.</p> <p>Furthermore, there needs to be a clearer position statement within the East Riding Core Strategy in relation to the delivery of the actual numbers of dwellings within Hull, given that the majority of the Hull HMA lies within East Riding.</p> <p>Paragraph 6.8 states that the Beverley & Central sub area 'has been established to meet the needs of the East Riding and help achieve the aspirations of the city [Hull],'</p> <p>However, it should be expressly stated that this includes delivering some of Hull's housing needs should Hull not be able to deliver sufficient numbers. Failure to do so could result in a systematic failure to deliver sufficient dwellings to Hull and its HMA; it must also be remembered at this stage that Hull is identified in the RSS as a Regional City and there could be serious ramifications if the majority, or all, of the Hull HMA fails to deliver the requisite number of dwellings because of an overly restrictive initial stance. Consequently, an overly restrictive stance in the early years of the Plan period, aligned with that adopted by Hull, is likely to result in a failure to meet the significant demand for housing and employment, at the appropriate time, which is now, and in the appropriate areas, which includes Beverley. This is, in turn, likely to result in East Riding not achieving the positive Vision and Objectives set out in the Core Strategy, the Sustainable Community Plan or the Council's Business Plan.</p> <p>Given that this will affect Hull as well as East Riding the Yorkshire and Humber region as a whole could suffer.</p> <p>Proposed Change</p> <p>It is not considered that paragraphs 2.6 and 2.7 as currently drafted are unsound and it is recognised that there needs to be a synergy between East Riding's and Hull's Core Local Development Frameworks. However, it must be clear that East Riding is not aligning itself too closely with the 'Stepped Growth' approach being promoted by Hull,</p>	
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			<p>otherwise it could have a detrimental impact on the delivery of development, particularly housing, and particularly within the Hull HMA, in which Beverley is located.</p> <p>Furthermore, paragraph 6.8 is linked to the above which is why it is addressed here, and this paragraph needs to be revised to make specific reference to the fact that East Riding will accommodate some of Hull's housing needs should Hull fall too far behind in their trajectory. This will avoid any ambiguity as to what is alluded to with the sentence that that the Beverley & Central sub area 'has been established to meet the needs of the East Riding and help achieve the aspirations of the city [Hull].'</p>	
Mr Dan Mitchell, Barton Willmore on behalf of Stuart Evison,	Object	CSPA/1634	We consider that the diagrams which form figures 3, 4 and 5 on pages 10, 11 and 13 are not clear (in resolution terms and graphical representation) and could be significantly improved to identify the key spatial issues for East Riding.	Noted.
Mr Dan Mitchell, Barton Willmore on behalf of Mr Paul Butler, Barratt and David Wilson Homes	Observations	CSPA/1835	We consider that the diagrams which form figures 3, 4 and 5 on pages 10, 11 and 13 are not very clear and could be significantly improved to ensure that they are meaningful diagrams which contribute to and identify the key spatial issues for East Riding. 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.	Noted.

Paragraph 2.2

Consultee	Nature Of Response:	Comment ID	Response	Officer Comments
Professor Barbara English,	Observations	CSPA/9	It is remarkable that York is hardly mentioned. As an ordinary citizen from Beverley, I regularly travel to York for many cultural and economic reasons, and virtually never to Leeds or Sheffield, and never to Scunthorpe or Grimsby. How is York so neglected? Is the dominance of Leeds due to the presence of Yorkshire Forward, soon to be abolished? It has never been our regional centre in any meaningful way.	Noted. The relationship with York is acknowledged through much of the evidence and the subsequent Further Consultation and Draft Strategy Documents.

Paragraph 2.3

Consultee	Nature Of	Comment	Response	Officer Comments
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	Response:	ID		
Mr Alastair McIntyre, Government Office for Yorkshire and the Humber	Observations	CSPA/148	<p>As you will be aware, the Secretary of State announced on 6 July the revocation of RSS with immediate effect. The link below will take you to the letter to Chief Planning Officers covering Guidance to Local Planning Authorities and a copy of the Statement made by the Secretary of State http://www.communities.gov.uk/documents/planningandbuilding/pdf/1631904.pdf</p> <p>Local authorities do not have to review their draft core strategies, but they may choose to review them, or parts of them. It will be for you to consider the extent to which your Core Strategy needs to be reviewed in the light of this revocation including, for example, your emerging policies on housing targets. Reviews should focus on those areas that authorities want to revise rather than being a wholesale rethink of the plan. Reviews, including consultation and sustainability appraisal, should be undertaken in line with current LDF Regulations. It is important that this work is done quickly so that plans can proceed to submission. (See also our comments below about housing).</p>	Noted.

Paragraph 2.5

Consultee	Nature Of Response:	Comment ID	Response	Officer Comments
Mr Richard Borrie,	Object	CSPA/755	There is a subconscious bias towards consideration of Hull throughout the Core Strategy. However much of the East Riding falls into the orbit of York and the Leeds city region, which are the key centres of economic activity in Yorkshire / Humberside. I would therefore like to see a more balanced approach to links with neighbouring authorities, which better reflects the importance of York and West Yorkshire.	Noted. The relationship with York is acknowledged through much of the evidence and the subsequent Further Consultation and Draft Strategy Documents.
Mr David Renwick, East Riding Of Yorkshire Council	Observations	CSPA/992	We support the paragraph that notes the relationship with Hull particular from the settlements that are its immediate neighbours. Retail and leisure should include culture as many people travel into Hull for theatre, art, music etc. The most likely residents to access Hull live in the proposed Beverley and Central sub-area. To a lesser	Noted.

			extent residents living in the Vale of York travel to York for retail, leisure and culture, residents in Goole travel into Leeds and South Yorkshire for retail, leisure and culture.	
Mr Dan Mitchell, Barton Willmore on behalf of Stuart Evison,	Support with conditions	CSPA/1638	Paragraph 2.5 of the document acknowledges that the district's strongest relationship is with the City of Hull, which is the 'prime focus for development and regeneration activity in the East Riding of Yorkshire'. It also recognises that Hull's housing market areas extends well into the East Riding. Our client supports this statement. We are however concerned that the settlement growth strategy does not reflect this overarching statement.	Noted. Support welcomed.

Figure 4

Consultee	Nature Of Response:	Comment ID	Response	Officer Comments
Professor Ian Reid, Beswick Parish Council	Observations	CSPA/79	Although the City of Hull lies in a secondary hierarchical tier relative to e.g. Leeds, geographical separation dictates that it represents the core of a city-region and this should be acknowledged by the East Riding, for which much of its service and employment opportunities lie within Hull. Equally, the City of Hull, of necessity, must acknowledge its sphere of influence within the East Riding, which provides a residential base extending beyond Driffield, Gilberdyke and Patrington and important recreational opportunities, especially in coastal towns of Bridlington and Hornsea and, to a lesser extent, in the Wolds. Were there any lingering sensitivities about this symbiosis from prior days of North Humberside, these need dispelling for pragmatic future development.	Noted.
Mr Dan Mitchell, Barton Willmore on behalf of Mr Paul Butler, Barratt and David Wilson Homes	Object	CSPA/162	We consider that the diagram which forms figure 4 is not very clear and could be significantly improved to ensure that they are meaningful diagrams which contribute to and identify the key spatial issues for East Riding.	Noted.
Mr Dan Mitchell, Barton Willmore on behalf of Stuart Evison,	Object	CSPA/1635	We consider that the diagrams which form figures 3, 4 and 5 on pages 10, 11 and 13 are not clear (in resolution terms and graphical representation) and could be significantly improved to identify the key spatial issues for East Riding.	Noted.

Paragraph 2.6

Consultee	Nature Of Response:	Comment ID	Response	Officer Comments
Mr Pete Sulley, Barton Willmore on behalf of Central Land Holdings, Central Land Holdings		CSPA/1679		Noted.
Mr Dan Mitchell, Barton Willmore on behalf of Stuart Evison,	Object	CSPA/1639	Paragraph 2.6 states that because of the strong relationship between East Riding and the City of Hull, both Core Strategies need to be supportive of each other's ambitions and the policy approaches within them need to be coherent. As currently drafted, the East Riding of Yorkshire Preferred Approach Core Strategy does not fully recognise and support the ambitions of both East Riding and the City of Hull. The reasons for this are set out in detail later on in this report.	Noted.
Mr Pete Sulley, Barton Willmore on behalf of Humber Growers/Shirethorn Ltd	Object	CSPA/1696	<p>It is recognised in paragraph 2.6 that, because of the strong relationship between Hull and East Riding, their respective Core Strategies need to be supportive of each other's ambitions and the policy approaches within them need to be coherent. This is relevant to all settlements, especially those within the Hull Housing Market Area (HMA), as defined in the RSS, and the Hull Travel To Work Area (TTWA) as defined in the Hull Housing Market Assessment, and Elloughton cum Brough is located in both of these areas.</p> <p>Paragraph 2.7 goes on to refer to Hull's strategy of adopting a 'Stepped Growth' approach. Barton Willmore has significant reservations about this approach and made representations on the Hull Core Strategy on this matter. These representations are attached, ad verbatim, as Appendix 2 to this document.</p> <p>In summary, the representations to the 'Stepped Growth' approach advocated in the 'Hull Development Framework - Core Strategy Emerging Preferred Approach: February 2010' centre around a number of matters. These comprise:</p> <ul style="list-style-type: none">◆ Backloading the delivery of housing towards the end of the Plan period, in direct conflict with advice contained	Noted.

		<p>within PPS3;</p> <p>. Misapplication of the principle of the 'Stepped Growth' approach as advocated in the RSS;</p> <p>◆ A restrictive approach seeking to constrain growth, especially in the short term, which runs counter to the positive and progressive Spatial Vision and Strategic Objectives highlighted in the Hull Core Strategy; and Basing the 'Stepped Growth' approach largely, if not primarily, on the Housing Market Assessment and its update, as opposed to the range of evidence and debate that the RSS strategy was based upon.</p> <p>Whilst the East Riding Core Strategy is not advocating, or indeed suggesting, such a flawed approach, it is evident that the two strategies are aligned. Further, Policy SS4 states that there will be increases and decreases of development rates over the Plan period in certain areas. Therefore, care must be taken so that the increase and decrease of development rates in Policy SS4 are not wholly aligned with the overly restrictive 'Stepped Growth' approach proposed in the Hull Core Strategy, which significantly constrains development in the short term with a view to 'clawing back' the shortfall towards the end of the Plan period. Moreover, this 'clawback' is also at build rates that Hull has not come anywhere near to achieving over the last 10 years, and this does not take into account demolitions which have, in some instances, resulted in a net loss to the housing stock.</p> <p>As such there is a very real concern that Hull will simply fall too far behind in their housing trajectory and will not be able to catch up. East Riding could also fall into the same trap if their strategy is too closely aligned with that of Hull's.</p> <p>As mentioned above, this is particularly prevalent in relation to the Hull HMA and Hull TTWA, in which Elloughton cum Brough is located, and especially given that the RSS states that 40% of East Riding's provision should be located within the Hull HMA. There is also an express need to develop the M62/A63 corridor for employment uses, a significant part of which lies within the Hull HMA</p>	
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		<p>and Hull TTWA.</p> <p>Furthermore, there needs to be a clearer position statement within the East Riding Core Strategy in relation to the delivery of the actual numbers of dwellings within Hull, given that the majority of the Hull HMA and Hull TTWA lie within East Riding.</p> <p>Paragraph 6.8 states that the Beverley & Central sub area 'has been established to meet the needs of the East Riding and help achieve the aspirations of the city [Hull].'</p> <p>However, it should be expressly stated that this includes delivering some of Hull's housing needs should Hull not be able to deliver sufficient numbers. Failure to do so could result in a systematic failure to deliver sufficient dwellings to Hull and its HMA and TTWA; it must also be remembered at this stage that Hull is identified in the RSS as a Regional City and there could be serious ramifications if the majority, or all, of the Hull HMA fails to deliver the requisite number of dwellings because of an overly restrictive initial stance.</p> <p>Consequently, an overly restrictive stance in the early years of the Plan period, aligned with that adopted by Hull, is likely to result in a failure to meet the significant demand for housing and employment, at the appropriate time, which is now, and in the appropriate areas, which includes Elloughton cum Brough given its strategic location. This is, in turn, likely to result in East Riding not achieving the positive Vision and Objectives set out in the Core Strategy, 'Our East Riding' or the Council's 'Business Plan'.</p> <p>Given that this will affect Hull as well as East Riding the Yorkshire and Humber region as a whole could suffer.</p> <p>Proposed Change</p> <p>It is not considered that paragraphs 2.6 and 2.7 as currently drafted are unsound and it is recognised that there needs to be a synergy between East Riding's and Hull's Core Local Development Frameworks. However, it must be clear that East Riding is not aligning itself too closely with the 'Stepped Growth' approach being promoted by Hull, otherwise it could have a detrimental impact on the delivery of development, particularly housing, and particularly within the Hull HMA and TTWA, in which</p>	
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			<p>Elloughton cum Brough is located.</p> <p>Furthermore, paragraph 6.8 is linked to the above which is why it is addressed here, and this paragraph needs to be revised to make specific reference to the fact that East Riding will accommodate some of Hull's housing needs should Hull fall too far behind in their trajectory. This will avoid any ambiguity as to what is alluded to with the sentence that the Beverley & Central sub area 'has been established to meet the needs of the East Riding and help achieve the aspirations of the city [Hull].'</p>	
<p>Mr Pete Sulley, Barton Willmore on behalf of The Kingswood Parks Development Company Ltd,</p>	<p>Support with conditions</p>	<p>CSPA/1682</p>	<p>It is recognised in paragraph 2.6 that, because of the strong relationship between Hull and East Riding, their respective Core Strategies need to be supportive of each other's ambitions and the policy approaches within them need to be coherent. This is particularly prevalent in relation to North Kingswood as it is located adjacent to Kingswood, a major urban extension that has been under construction for 15 years and will not be fully built out for a number of years. It is also within the Hull Housing Market Area (HMA) as defined in the RSS and the Hull Travel To Work Area (TTWA).</p> <p>Paragraph 2.7 goes on to refer to Hull's strategy of adopting a 'Stepped Growth' approach. Barton Willmore has significant reservations about this approach and made representations on the Hull Core Strategy on this matter. These representations are attached, ad verbatim, as Appendix 3 to this document.</p> <p>In summary, the representations to the 'Stepped Growth' approach advocated in the 'Hull Development Framework - Core Strategy Emerging Preferred Approach: February 2010' centre around a number of matters. These comprise:</p> <ul style="list-style-type: none"> ◆ Backloading the delivery of housing towards the end of the Plan period, in direct conflict with advice contained within PPS3; ◆ Misapplication of the principle of the 'Stepped Growth' approach as advocated in the RSS; ◆ A restrictive approach seeking to constrain growth, especially in the short term, which runs counter to the 	<p>Noted.</p>

		<p>positive and progressive Spatial Vision and Strategic Objectives highlighted in the Hull Core Strategy; and</p> <p>◆ Basing the 'Stepped Growth' approach largely, if not primarily, on the Housing Market Assessment and its update, as opposed to the range of evidence and debate that the RSS strategy was based upon.</p> <p>Whilst the East Riding Core Strategy is not advocating, or indeed suggesting, such a flawed approach, it is evident that the two strategies are aligned. Further, Policy SS4 states that there will be increases and decreases of development rates over the Plan period in certain areas. Therefore, care must be taken so that the increase and decrease of development rates in Policy S54 are not wholly aligned with the overly restrictive 'Stepped Growth' approach proposed in the Hull Core Strategy, which significantly constrains development in the short term with a view to 'clawing back' the shortfall towards the end of the Plan period. Moreover, this 'clawback' is also at build rates that Hull has not come anywhere near to achieving over the last 10 years, and this does not take into account demolitions which have, in some instances, resulted in a net loss to the housing stock.</p> <p>As such there is a very real concern that Hull will simply fall too far behind in its housing trajectory and will not be able to catch up. East Riding could also fall into the same trap if its strategy is too closely aligned with that of Hull's. Furthermore, there needs to be a clearer position statement within the East Riding Core Strategy in relation to the delivery of the actual numbers of dwellings within Hull, given that the majority of the Hull HMA lies within East Riding.</p> <p>Paragraph 6.8 states that the Beverley & Central sub area, which includes North Kingswood, has been established to meet the needs of the East Riding and help achieve the aspirations of the city [Hull]. However, it should be expressly stated that this includes delivering some of Hull's housing needs should Hull not be able to deliver sufficient numbers. Failure to do so could result in a systematic failure to deliver sufficient dwellings to Hull and its HMA; it</p>	
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			<p>must also be remembered at this stage that Hull is identified in the RSS as a Regional City and there could be serious ramifications if the majority, or all, of the Hull HMA fails to deliver the requisite number of dwellings because of an overly restrictive initial stance.</p> <p>Consequently, an overly restrictive stance in the early years of the Plan period, aligned with that adopted by Hull, is likely to result in a failure to meet the significant demand for housing and employment, at the appropriate time, which is now, and in the appropriate areas, which includes North Kingswood. This is, in turn, likely to result in East Riding not achieving the positive Vision and Objectives set out in the Core Strategy, the Sustainable Community Plan or the Council's Business Plan.</p> <p>Given that this will affect Hull as well as East Riding the Yorkshire and Humber region as a whole could suffer.</p> <p>Proposed Change</p> <p>It is not considered that paragraphs 2.6 and 2.7 as currently drafted are unsound and it is recognised that there needs to be a synergy between East Riding's and Hull's Core Local Development Frameworks. However, it must be clear that East Riding is not aligning itself too closely with the 'Stepped Growth' approach being promoted by Hull, otherwise it could have a detrimental impact on the delivery of development, particularly housing, and particularly within the Hull HMA, in which North Kingswood is located.</p> <p>Furthermore, paragraph 6.8 is linked to the above which is why it is addressed here, and this paragraph needs to be revised to make specific reference to the fact that East Riding will accommodate some of Hull's housing needs should Hull fall too far behind in its trajectory. This will avoid any ambiguity as to what is alluded to with the sentence that the Beverley & Central sub area has been established to meet the needs of the East Riding and help achieve the aspirations of the city [Hull].'</p>	
Mr Pete Sulley, Barton Willmore on behalf of David Watts,	Object	CSPA/1782	2.1 It is recognised in paragraph 2,6 that, because of the strong relationship between Hull and East Riding, their respective Core Strategies need to be supportive of each other's ambitions and the policy approaches within them	Noted.

need to be coherent. This is relevant to all settlements, especially those within the Hull Housing Market Area (HMA), as defined in the RSS, and the Hull Travel To Work Area (TTWA) as defined in the Hull Housing Market Assessment, and South Cave is located within both of these areas.

2.2 Paragraph 2,7 goes on to refer to Hull's strategy of adopting a 'Stepped Growth' approach. Barton Willmore has significant reservations about this approach and made representations on the Hull Core Strategy on this matter. These representations are attached, ad verbatim, as Appendix 2 to this document.

2.3 In summary, the representations to the 'Stepped Growth' approach advocated in the 'Hull Development Framework - Core Strategy Emerging Preferred Approach: February 2010' centre around a number of matters. These comprise:

- ◆ Backloading the delivery of housing towards the end of the Plan period, in direct conflict with advice contained within PPS3;
- ◆ Misapplication of the principle of the 'Stepped Growth' approach as advocated in the RSS;
- ◆ A restrictive approach seeking to constrain growth, especially in the short term, which runs counter to the positive and progressive Spatial Vision and Strategic Objectives highlighted in the Hull Core Strategy; and
- ◆ Basing the 'Stepped Growth' approach largely, if not primarily, on the Housing Market Assessment and its update, as opposed to the range of evidence and debate that the RSS strategy was based upon.

2.4 Whilst the East Riding Core Strategy is not advocating, or indeed suggesting, such a flawed approach, it is evident that the two strategies are aligned. Further, Policy SS4 states that there will be increases and decreases of development rates over the Plan period in certain areas. Therefore, care must be taken so that the increase and decrease of development rates in Policy SS4 are not wholly aligned with the overly restrictive 'Stepped Growth'

		<p>approach proposed in the Hull Core Strategy, which significantly constrains development in the short term with a view to 'clawing back' the shortfall towards the end of the Plan period.</p> <p>2.5 Moreover, this 'clawback' is also at build rates that Hull has not come anywhere near to achieving over the last 10 years, and this does not take into account demolitions which have, in some instances, resulted in a net loss to the housing stock.</p> <p>2.6 As such there is a very real concern that Hull will simply fall too far behind in their housing trajectory and will not be able to catch up. East Riding could also fall into the same trap if their strategy is too closely aligned with that of Hull's.</p> <p>2.7 As mentioned above, this is particularly prevalent in relation to the Hull HMA and Hull TTWA, in which South Cave is located, and especially given that the RSS states that 40% of East Riding's provision should be located within the Hull HMA. There is also an express need to develop the M62/A63 corridor for employment uses, a significant part of which lies within the Hull HMA and Hull TTWA.</p> <p>2.8 Furthermore, there needs to be a clearer position statement within the East Riding Core Strategy in relation to the delivery of the actual numbers of dwellings within Hull, given that the majority of the Hull HMA and Hull TTWA lie within East Riding.</p> <p>2.9 Paragraph 6.8 states that the Beverley & Central sub area has been established to meet the needs of the East Riding and help achieve the aspirations of the city [Hull]. However, it should be expressly stated that this includes delivering some of Hull's housing needs should Hull not be able to deliver sufficient numbers. Failure to do so could result in a systematic failure to deliver sufficient dwellings to Hull and its HMA and TTWA; it must also be remembered at this stage that Hull is identified in the RSS as a Regional City and there could be serious ramifications if the majority, or all, of the Hull HMA fails to deliver the requisite number of dwellings because of an overly restrictive initial stance.</p> <p>2.10 Consequently, an overly restrictive stance in the early</p>	
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			<p>years of the Plan period, aligned with that adopted by Hull, is likely to result in a failure to meet the significant demand for housing and employment, at the appropriate time, which is now, and in the appropriate areas, which includes South Cave given its role as a Supporting Village and its location within the Hull HMA and TTWA. This is, in turn, likely to result in East Riding not achieving the positive Vision and Objectives set out in the Core Strategy, 'Our East Riding' or the Council's 'Business Plan'.</p> <p>2.11 Given that this will affect Hull as well as East Riding the Yorkshire and Humber region as a whole could suffer.</p> <p>Proposed Change</p> <p>2.12 It is not considered that paragraphs 2.6 and 2.7 as currently drafted are unsound and it is recognised that there needs to be a synergy between East Riding's and Hull's Core Local Development Frameworks. However, it must be clear that East Riding is not aligning itself too closely with the 'Stepped Growth' approach being promoted by Hull, otherwise it could have a detrimental impact on the delivery of development, particularly housing, and particularly within the Hull HMA and TTWA, in which South Cave is located.</p> <p>2.13 Furthermore, paragraph 6.8 is linked to the above which is why it is addressed here, and this paragraph needs to be revised to make specific reference to the fact that East Riding will accommodate some of Hull's housing needs should Hull fall too far behind in their trajectory. This will avoid any ambiguity as to what is alluded to with the sentence that that the Beverley & Central sub area 'has been established to meet the needs of the East Riding and help achieve the aspirations of the city [Hull].'</p>	
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Key overarching issues

Consultee	Nature Of Response:	Comment ID	Response	Officer Comments
Ian Smith, English Heritage Yorkshire Region	Observations	CSPA/416	Given the character of the East Riding, it is almost incomprehensible that the management of the area's substantial environmental resource is not identified as a separate key issue which the plan needs to address. There	Noted. This context has helped to shape the policies in the Draft Strategy Document.

		<p>are several elements of the management of the heritage assets of the East Riding which the Plan ought to address including:-</p> <ul style="list-style-type: none"> ◆ After Kirklees, the East Riding of Yorkshire area has more designated historic assets than any other authority in the Region and more high-grade Listed Buildings and a greater number of Conservation Areas than anywhere else in Yorkshire. However, with the exception of Leeds, Bradford and Kirklees it also has more development pressure than any other authority in the Region. ◆ The 2009 Heritage at Risk Register showed that the East Riding had the highest total of Scheduled Monuments at Risk (equating to 55% of the Scheduled Monuments in the local planning authority area) in Yorkshire. ◆ In 2009, the East Riding had the second highest total of Buildings at Risk in the Region including more Grade I Buildings at Risk than any other authority. Seven of the buildings have been on the Register since 1999. ◆ The Registered Battlefield at Stamford Bridge has been identified as being at high risk. ◆ One of the defining features of both the flat landscape of the Holderness area and of the Yorkshire Wolds are their church towers and spires. These landscapes are coming under increasing pressure from development proposals such as wind farms. ◆ The extensive prehistoric ritual and settlement landscape of the Yorkshire Wolds with its concentration of archaeological features is under threat from intensive arable cultivation and from wind farm developments. Much of this area is undesignated. ◆ Beverley is defined as a Principal Town within the RSS and, as a result, will be one of the main areas for development. This could impact upon the historic grain of the town, its landscape setting, and views of the Minster. <p>Suggested amendment: Amend accordingly</p>	
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Ms Diana Sandy,	Observations	CSPA/781	<p>THE FUTURE</p> <p>We currently stand at the door to the future and the door is wide open. Our generation have the privilege of laying the foundations for that future and that cannot be done by using past models and theories.</p> <p>It is time to accept the challenge of thinking outside the box, exploring exciting but different ideas, rejecting centralised diktats and refusing to be bullied and blackmailed by vested interests - of all types.</p> <p>The really big concern which is on the very near horizon is for food sustainability. Current agriculture is very dependent on oil for ensuring maximum crops. Land has to be able to move towards a more sustainable production method which is not reliant on oil based derivatives. This means that for the next few decades there will be a need to use current fallow land whilst existing cropped land recovers its natural potential. Current fallow land MUST NOT be given over to housing where it will be lost forever. Producing crops less intensively will have a knock on effect on health, well being and intelligence. Potentially very cost effective!</p> <p>Another big concern on the very near horizon is water shortage. We need to include in all our planning the need to transport water from the West as well as finding easy to conserve water. Solar powered de-salination may become an option - who knows?</p> <p>And then there's power. How much electricity does this region need to operate effectively and how will it be produced? Now is not the time for piecemeal thinking. 'A future without oil could be better than the present if we use our imagination and think creatively.'</p> <p>Rob Hopkins - co-founder of the Transition Towns Movement</p> <p>The human species can move into the next stage of its evolution if it is allowed and encouraged to.</p> <p>All over the world and indeed locally too, groups at all levels are accepting the challenge and opportunities we have before us. At Bishop Burton College in February we had 'Heading Towards the Perfect Storm' - the challenges facing the agricultural world. The Royal Agricultural</p>	Noted.
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			<p>College's Spring conference was entitled 'Transition Towns need Transition Farms'. The recent day conference at Hull University brought together the business, academic and administrative sectors under the title 'The Future of Global Logistics'. Thinking, action, research, invention are all going on all over the world. We are not alone.</p> <p>'World changing' edited by Alex Stefan demonstrates that all this thinking, action and invention has been happening for some time now with exciting ideas and outcomes.</p> <p>"So here we are. We need, in the next twenty-five years or so, to do something never before done. We need to consciously redesign the entire material basis of our civilization. The model we replace it with must be dramatically more ecologically sustainable, offer large increases in prosperity for everyone on the planet, and not only function in areas of chaos and corruption, but also help transform them. That alone is a task of heroic magnitude, but there's an additional complication: we only get one shot. Even if we were, universally, as a species, to decide today to completely change our ways, we'd still have to rely on current technologies and practices while setting up the new system. If we all agreed to live more simply, to embrace our best current technologies, and to share fairly and sustainably the planet's resources to aim for one-planet practices by the time we all got there, we'd still be in overshoot, because in those intervening decades, we'd have destroyed another huge chunk of the planet's natural systems, and would have, in effect, less planet. Change takes time, and time is what we don't have. And there's always a lag between choice and adoption. In practice, the inertia of that which exists can be massive; the retooling period, even when things are changing quickly, tends to be significant - in many cases lasting decades. Fail to act boldly enough and we may fail completely." Taken from the book 'WORLD CHANGING' A USER'S GUIDE FOR THE 21ST CENTURY? Edited by Alex Stefan. Pub: Abrams, New York. ISBN 13: 978-0-8109-7085-4</p>	
Mr David Renwick, East Riding Of Yorkshire Council	Observations	CSPA/993	The balance of issues presented in this Section is skewed towards the economic and social issues and to present a balanced sustainable picture more reference needs to be	Noted.

			made to environmental issues beyond climate change alone. We consider the loss of biodiversity as a key global, national and local issue that warrants inclusion in this Section over an above the very brief mention it gets in Section 2.21 (last bullet point). The Sustainability Appraisal (SA) picks out the key issues in relation to the decline in biodiversity (e.g. in Table 6.2 point 15 and Section 4.103 to 4.112).	
Mr Dave Evans, Humber Archaeology Partnership	Observations	CSPA/2238	<p>Given the character of the East Riding, it is almost incomprehensible that the management of the area's substantial environmental resource is not identified as a separate key issue here, which the plan needs to address. There are several elements of the management of the heritage assets of the East Riding which the Plan ought to address including:-</p> <ul style="list-style-type: none"> - After Kirklees, the East Riding of Yorkshire area has more designated historic assets than any other authority in the Region and more high-grade Listed Buildings and a greater number of Conservation Areas than anywhere else in Yorkshire. However, with the exception of Leeds, Bradford and Kirklees it also has more development pressure than any other authority in the Region. - The 2009 Heritage at Risk Register showed that the East Riding had the highest total of Scheduled Monuments at Risk (equating to 55% of the Scheduled Monuments in the local planning authority area) in Yorkshire. -In 2009, the East Riding had the second highest total of Buildings at Risk in the Region including more Grade I Buildings at Risk than any other authority. Seven of the buildings have been on the Register since 1999. -The Registered Battlefield at Stamford Bridge has been identified as being at high risk. - One of the defining features of both the flat landscape of the Holderness plain and of the Yorkshire Wolds are their church towers and spires. These landscapes are coming under increasing pressure from development proposals such as wind farms. - The extensive prehistoric and Romano-British ritual, funerary and settlement landscape of the Yorkshire Wolds with its concentration of archaeological features, is under 	Noted. This context has helped to shape the policies in the Draft Strategy Document.

			<p>threat from intensive arable cultivation and from wind farm developments. Much of this area is undesignated.</p> <p>- Beverley is defined as a Principal Town within the RSS and, as a result, will be one of the main areas for development. This could impact upon the historic grain of the town, its landscape setting, and views of the Minster and St Mary's.</p>	
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Paragraph 2.12

Consultee	Nature Of Response:	Comment ID	Response	Officer Comments
Mr David Renwick, East Riding Of Yorkshire Council	Observations	CSPA/989	<p>It is excellent to see climate change as one of the key overarching issues, this is vital to ensure climate change mitigation and adaptation is central to the development of the LDF. The recent Audit Commission (AC) inspection focused on climate change and noted that 'the area-wide emissions of CO2 from industrial, domestic and transport sources are among the worst 25 per cent of similar areas'. Coming from this, the AC recommended some areas where we could do better, and it is very important that the LDF assists in facilitating these improvements. For example, the AC said that we should be 'being bolder about how housing, transport and development will contribute to achieving the reduction in CO2 by 2020', look to be 'maximising opportunities for a local renewable energy sector' and that 'the energy efficiency of private sector homes is poor.' These are obviously all areas where the LDF sets the framework for taking action to improve. They also noted that 'the Council's current strategies do not directly consider climate change impacts' and this is again something to be noted in the development of the LDF and the plans and strategies that are used as its evidence base.</p>	Noted.

Paragraph 2.13

Consultee	Nature Of Response:	Comment ID	Response	Officer Comments
Ms Margaret Baddeley, Nathaniel Lichfield & Partners Ltd on behalf of	Observations	CSPA/160	<p>Bourne Leisure agrees that the Core Strategy should recognise the issue of 'increasing rates of coastal erosion' (p. 12) for the area and the challenges this will bring for</p>	Noted.

Bourne Leisure Ltd, Bourne Leisure Ltd			East Riding residents and businesses. Bourne Leisure agrees that climate change and the resulting associated increased flood risk and coastal erosion should rightly be identified as key spatial issues facing the area. We support the recognition in paragraph 2.13 that these issues will "present a number of challenges for East Riding residents and businesses which planning policy, alongside other initiatives, will need to meet". However, Bourne Leisure would stress the need for the specific locational characteristics and vulnerability of proposed uses to be fully taken into account, and for priority to be given to defending existing properties where possible. In particular, it will be important to ensure a reasonable balance is taken so as not to prevent development that would pose little or no risk to people and/or property, in order to maintain the vitality and viability of coastal communities.	
Ms Diana Sandy,	Observations	CSPA/780	Reference to climate change seems to concentrate on flooding etc rather than other aspects e.g. drought and the need to transport water from the west.	Noted.

Paragraph 2.14

Consultee	Nature Of Response:	Comment ID	Response	Officer Comments
Mr Matthew Naylor, Yorkshire Water	Observations	CSPA/130	Paragraph 2.14 states the Core Strategy will aim to mitigate against climate change. A suggested policy, for either the Core Strategy (potentially policy SSI) or an alternative DPD, would be to ensure that on brownfield sites there is a 30% reduction in surface water flows from the previous rate. This approach is being promoted by both Yorkshire Water and the Environment Agency.	Noted. Proposed Policy HQE6 of the Preferred Approach Core Strategy addresses this. This is taken further in the Draft Strategy Document (ENV6).
Mr Richard Borrie,	Observations	CSPA/757	Building more than a thousand new houses in Pocklington is not consistent with reducing climate change impact, regardless of how environmentally friendly the buildings are. There is an inherent contradiction here which the Core Strategy does not really get to grips with.	Noted. The Strategy needs to balance addressing needs with minimising the impact on the environment.
Mr David Renwick, East Riding Of Yorkshire Council	Observations	CSPA/990	In point 2.14, the things mentioned under both bullet points are in fact 'mitigation', i.e. measures to reduce concentrations of GHGs, either by reducing their sources or by increasing their sinks. It would be a good idea to have	Noted.

			<p>one of the bullet points as mitigation and one as 'adaptation', which will be particularly important in a low-lying, coastal area like the East Riding. This will also put it in line with the two main strands of the draft Climate Change Strategy that is shortly to go out to public consultation. Adaptation, which means acting to minimise the effects of climate change, could include things like flood proofing homes and businesses or ensuring transport infrastructure is prepared in anticipation of more extreme weather events, whether that be hotter temperatures or increased heavy rainfall. Adaptation through sustainable construction (for example, making more use of natural cooling / shading methods in buildings) is actually touched on under ?mitigation? in the second bullet point.</p>	
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Paragraph 2.15

Consultee	Nature Of Response:	Comment ID	Response	Officer Comments
Mr Richard Borrie,	Observations	CSPA/756	<p>It is worth noting that over the past 15 years population growth in the A1079 corridor has been the second fastest in the UK outside of London. Local infrastructure is already quite stretched as a result.</p> <p>There is some disagreement between the LDF population forecasts and the East Riding Council data observatory figures- the latter suggests that East Riding Council will need to build the equivalent of 3 towns the size of Bridlington in the next 15 years.</p>	Noted. The issue of population forecasts and deriving a housing requirement for the East Riding has been considered in the preparation of the Strategy.
Mr Geoff Prince, Geoffrey Prince Associates Ltd on behalf of Mrs Margaret Jibson,	Observations	CSPA/1180	<p>This paragraph states that the East Riding's LDF will be based on planned growth as set down in the RSS. Since the government has announced the abolition of RSSs, then it will be up to ERYC to determine its own level and distribution of housing provision based on its evidence base including the Strategic Housing Market Assessment (SHMA) and the National Housing and Planning Advice Unit (NHPAU) projections - this would suggest that higher levels of housing are likely to be required across most of the East Riding, particularly if both general and local housing needs are to be met.</p>	Noted. The council has prepared evidence to establish its own housing requirement.
Nathan Smith, Barton	Observations	CSPA/1595	Galliford supports the Council's approach to setting out	Noted.

<p>Willmore on behalf of Galliford Try (Strategic) Land, Galliford Try (Strategic) Land</p>			<p>the planned growth as set out in RSS, which suggests that the East Riding's population could grow in the order of 47,000 by 2026.</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) This was followed by a letter from Steve Quartermain (Chief Planner) to all Chief Planning Officers in England outlining that the Secretary of State announced the revocation of Regional Strategies with immediate effect. Regional Strategies have been revoked under s79(6) of the Local Democracy Economic Development and Construction Act 2009 and no longer form part of the development plan for the purposes of s38(6) of the Planning and Compulsory Purchase Act 2004.</p> <p>Notwithstanding this, Galliford notes that the Core Strategy is based on an evidence base which informed the RSS. Therefore Galliford believes that the Council should as a starting point continue to plan for 1150 (net additional) and 1190 (gross) homes per year, which is the proposed level of growth that the Council put forward during the drafting of the now adopted RSS. Further delays in the evolution of the LDF would further delay the delivery of much needed family housing within the East Riding.</p> <p>Therefore these representations are based on the Core Strategy Preferred Approach as drafted.</p>	
<p>Mr Dan Mitchell, Barton Willmore on behalf of Mr Paul Butler, Barratt and David Wilson Homes</p>	<p>Support</p>	<p>CSPA/1838</p>	<p>Chapter 2 of the Core Strategy deals with population growth on page 12 and paragraph 2.15 recognises that the population of the region and the-East Riding in particular, is projected to grow quite significantly over the plan period. Paragraph 2.17 acknowledges that the LDF must respond to this increase in population by providing the right scale and type of housing. Our client supports this statement as it is crucial that East Riding provide the right number and type of new homes in the next 15 years.</p>	<p>Noted. Support welcomed. The issue of population forecasts and deriving a housing requirement for the East Riding has been considered in the preparation of the Strategy.</p>

Paragraph 2.16

Consultee	Nature Of Response:	Comment ID	Response	Officer Comments
Ms Diana Sandy,	Observations	CSPA/782	The older age group - if indeed that turns out to be the trend - will be the county's best resource with experience, skills, resilience, time and, maybe, a not unreasonable income. Planning should be towards enabling them to contribute. 'Honour the Elders' should be the banner not 'Help the Aged'!	Noted.

Paragraph 2.17

Consultee	Nature Of Response:	Comment ID	Response	Officer Comments
Mr Dan Mitchell, Barton Willmore on behalf of Mr Paul Butler, Barratt and David Wilson Homes	Support	CSPA/170	Paragraph 2.17 acknowledges that the LDF must respond to this increase in population by providing the right scale and type of housing. Our client supports this statement as it is crucial that East Riding provide the right number and type of new homes in the next 15 years.	Noted. Support welcomed.
Mr Dan Mitchell, Barton Willmore on behalf of Stuart Evison,	Support	CSPA/1642	Chapter 2 of the Core Strategy deals with population growth on page 12 and paragraph 2.15 recognises that the population of the region and the East Riding in particular, is projected to grow quite significantly over the plan period. Paragraph 2.17 acknowledges that the LDF must respond to this increase in population by providing the right scale and type of housing. Our client supports this statement as it is crucial that East Riding provide the right number and type of new homes in the next 15 years.	Noted. Support welcomed. The issue of population forecasts and deriving a housing requirement for the East Riding has been considered in the preparation of the Strategy.
Nathan Smith, Barton Willmore on behalf of Kayterm Plc	Support	CSPA/1750	Our Client by and large agrees with the Key Spatial Issues set out in Chapter 2 of the Core Strategy Preferred Approach. Population Growth and Changing Demographics We note that at paragraph 2.15 of the Core Strategy, there is reference to the anticipated population growth in East Riding of approximately 47,000 people by 2026. Footnote 3 notes that this figure is based on the RSS housing requirement of 1,150 dwellings (net) over 17 years, multiplied by 2.4 persons per household. Whilst our Client supports the approach of planning for the anticipated level	Noted. Support welcomed. The issue of population forecasts and deriving a housing requirement for the East Riding has been considered in the preparation of the Strategy.

			<p>of growth, we would note that this figure doesn't take into account any rise in single person households or the ageing population, such that the anticipated level of growth could be somewhat higher. Furthermore, the evidence underpinning the RSS will have been gathered at best three years ago, such that more up-to-date information on population growth may be available.</p> <p>We also note that it is the intention of the new Coalition Government to abolish RSSs in favour of a 'bottom up' localised approach to planning, including setting local targets for housing. The Secretary of State for Communities and Local Government, the Rt Hon Eric Pickles MP, wrote to all Chief Planning Officers on 27th May 2010 to confirm this commitment and that his letter should be taken as a material planning consideration. However, there is no guidance from the Government to set out the timescales for and the means by which RSSs will be abolished. We refer to the advice produced by the Planning Inspectorate for use by its Inspectors in June 2010, which states at paragraph 6 that "Until a formal announcement is made and/or legislation implemented, there is no change to what constitutes the development plan (or the need for an up-to-date five year supply of deliverable sites as indicated in PPS3)...."</p> <p>We therefore note that as the RSS is, and continues to be, an adopted part of the statutory development plan that has been tested at Inquiry (based on robust evidence, including population forecasts) and that there is no other framework in place to guide the level of house building at a local level, the Council should continue to plan for 1,150 (net) and 1,190 (gross) dwellings per year, as set out in the RSS. On this basis, our Client supports paragraph 2.17, which notes the need to respond to the increase in population by providing housing of the right scale and type.</p>	
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Paragraph 2.18

Consultee	Nature Of Response:	Comment ID	Response	Officer Comments
Mr Dan Mitchell, Barton	Support	CSPA/168	5) Paragraph 2.18 of the Core Strategy states that spatial	Noted. Support welcomed.

Willmore on behalf of Mr Paul Butler, Barratt and David Wilson Homes			planning is concerned with place and their futures. We agree that this needs to be expanded and reflected throughout the document.	
Mr Dan Mitchell, Barton Willmore on behalf of Stuart Evison,	Object	CSPA/1641	Paragraph 2.18 of the Core Strategy states that spatial planning is concerned with place and their futures. We agree that this needs to be expanded and reflected throughout the document. Spatial plans should not just be a narrow view of land use planning but should also be concerned about place shaping. Therefore the Core Strategy needs to give greater consideration to land adjoining the administrative boundary of East Riding. Place shaping is reflected in the Government Good Practice Guidance on 'Planning Together: Updated practical guide for local strategic partnerships and planners' produced in 2009. Core Strategy documents should be explicitly required to address the various factors that make great places to live, work and play.	Noted.
Mr Dan Mitchell, Barton Willmore on behalf of Mr Paul Butler, Barratt and David Wilson Homes	Observations	CSPA/1837	Paragraph 2.18 of the Core Strategy states that spatial planning is concerned with place and their futures. We agree that this needs to be expanded and reflected throughout the document. Spatial plans should not just be a narrow view of land use planning but should also be concerned about place shaping. This is reflected in the Government Good Practice Guidance on 'Planning Together: Updated practical guide for local strategic partnerships and planners' produced in 2009. Core Strategy documents should be explicitly required to address the various factors that make great places to live, work and play.	Noted.
Mr John Brown, East Riding of Yorkshire Rural Partnership	Observations	CSPA/1914	Inequalities have been referred to several times in this report. Suffice to say at this point that the request to 'drill down deeper for those hidden pockets', so often we suspect tucked away in the most remote parts of the East Riding is strongly supported by our members and that the LDF is the most appropriate policy document to locate these and to seek to make mitigating provision. Reference is suggested to the recent book, 'The Spirit Level' by Professors Wilkinson and Pickett and to the interactive website based on their research and consequent data.	Noted. The LDF/Local Plan can help to address inequalities alongside other strategies and programmes such as the Community Plan, the Rural Strategy and the Economic Development Strategy.

Paragraph 2.19

Consultee	Nature Of Response:	Comment ID	Response	Officer Comments
Ray Williamson, Regeneration Team, ERYC	Observations	CSPA/876	In Paragraphs 2.18 and 2.19 I wonder if there should be reference to a wider role for planning in assisting regeneration. Not only the points about housing renewal and growth above, but also about revitalising town centres, regenerating our seaside resorts, encouraging and facilitating investment in areas where has been market failure, addressing rural deprivation and assisting the growth of jobs in areas where there is a particular need.	Noted.
Mr Geoff Prince, Geoffrey Prince Associates Ltd on behalf of Mrs Margaret Jibson,	Object	CSPA/1181	Whilst recognising the high levels of unemployment and deprivation in places such as Bridlington, Goole and Withernsea and the need for regeneration, we do not consider that this can be achieved by promoting higher levels of housing development in these places than the market can bear. Rather, housing provision in these settlements (and sub areas) should be reduced so that over time there is a better balance between levels of employment and housing demand. However, in the more prosperous locations with good economic prospects (and not requiring public sector support) housing provision should be increased. For example, there is a strong argument for encouraging the growth and expansion of Pocklington where employment levels are high, there are good communication links to York and Leeds, and where there is a healthy demand for market and affordable housing and land for employment purposes. Similarly places such as Beverley and Driffield as well as a number of rural service centres/supporting villages should also be encouraged to develop to take advantage of their economic prospects.	Noted.

Figure 5

Consultee	Nature Of Response:	Comment ID	Response	Officer Comments
Mr Dan Mitchell, Barton Willmore on behalf of Mr	Object	CSPA/163	We consider that the diagram which forms figure 5 is not very clear and could be significantly improved to ensure	Noted.

Paul Butler, Barratt and David Wilson Homes			that they are meaningful diagrams which contribute to and identify the key spatial issues for East Riding.	
Mr Dan Mitchell, Barton Willmore on behalf of Stuart Evison,	Object	CSPA/1636	We consider that the diagrams which form figures 3, 4 and 5 on pages 10, 11 and 13 are not clear (in resolution terms and graphical representation) and could be significantly improved to identify the key spatial issues for East Riding.	Noted.
Paragraph 2.20				
Consultee	Nature Of Response:	Comment ID	Response	Officer Comments
Mr Dan Mitchell, Barton Willmore on behalf of Mr Paul Butler, Barratt and David Wilson Homes	Support	CSPA/172	7) Paragraph 2.20 re-iterates that national and regional planning policies seek to direct the majority of new development towards urban rather than rural areas, which is based upon many reasons, but in particular climate change. Our client agrees that the majority of new development should be directed to large urban settlements in the district and that new development in isolated rural areas should be severely limited.	Noted. Support welcomed.
Mr Richard Borrie,	Observations	CSPA/758	East Riding Council proposes to build more than a thousand houses in Pocklington, which corresponds to an increase in the size of the town of 28%. In order to be consistent with the Council's objective of reducing the need to travel, it would be necessary to set some fairly tough targets for local employment and commuting, but this information has not been provided. We need to do more than just pay lip-service to these environmental aspects of the Core Strategy.	Noted.
Ms Diana Sandy,	Observations	CSPA/783	With the increased demand for more locally produced food, planning policies should be directed at encouraging the current housing stock to be owned by local workers rather than commuters from the urban areas	Noted. The planning system has limited scope to achieve this.
Mr A J Williams, Advance Land and Planning Limited on behalf of Leonard Cheshire Disability (LCD)	Object	CSPA/807	Given that half the population of East Riding live in rural communities it is disappointing that the Core Strategy adopts such a restrictive approach towards the distribution of development in most of the rural settlements. With the demise of the RSS, there will be an opportunity for the Authority to review its strategy to take better account of local needs and not just national and regional mantras?	Noted.
Mr Geoff Prince, Geoffrey	Observations	CSPA/1182	Now that the RSS has been revoked, there is no need to	Noted.

Prince Associates Ltd on behalf of Mrs Margaret Jibson,			<p>direct development towards urban rather than rural areas. Rather the Core Strategy should take more account of market forces. If people want to live in rural areas including rural and local service centres (LSCs) such as Pocklington (which they clearly do judging by house and land prices), then planning policies should not be designed so as to impose restrictions on meeting such aspirations. Parts of the East Riding of Yorkshire and in particular LSCs such as Pocklington and many rural service centres have significant potential for economic development and employment growth and a large latent demand for new housing - they also have underutilised infrastructure which means that the marginal costs of development are less than in large urban areas. Policies should aim to take advantage of this potential rather than stifling such demand, and make the rural parts of the East Riding a more sustainable place in which to live and work. Current thinking appears to be that only large towns and cities represent sustainable locations for development - this is not the case in a world of global communications - rural settlements have greater strengths to prosper and contribute to national economic output, and also to become more sustainable places in an internet based world. People want to enjoy a high quality of life - planning policies should not deny them this right.</p>	
Mr Dan Mitchell, Barton Willmore on behalf of Stuart Evison,	Support	CSPA/1643	<p>Paragraph 2.20 re-iterates that national and regional planning policies seek to direct the majority of new development towards urban rather than rural areas which is based upon many reasons but in particular climate change. Our client agrees that the majority of new development should be directed to large urban settlements in the East Riding of Yorkshire and land around the City of Hull. New development in isolated rural areas should be severely limited.</p>	Noted. Support welcomed.
Mr Dan Mitchell, Barton Willmore on behalf of Mr Paul Butler, Barratt and David Wilson Homes	Support	CSPA/1839	<p>Paragraph 2.20 re-iterates that national and regional planning policies seek to direct the majority of new development towards urban rather than rural areas which is based upon many reasons but in particular climate change. Our client agrees that the majority of new development should be directed to large urban settlements in the district and that new development in isolated rural</p>	Noted. Support welcomed.

areas should be severely limited.

Paragraph 2.21

Consultee	Nature Of Response:	Comment ID	Response	Officer Comments
Ms Margaret Baddeley, Nathaniel Lichfield & Partners Ltd on behalf of Bourne Leisure Ltd, Bourne Leisure Ltd	Observations	CSPA/169	Paragraph 2.21 of the Core Strategy Preferred Approach document notes that there are a number of rural-based challenges that the Core Strategy will need to address, including "protecting and enhancing the countryside, and managing different uses for land (e.g. biodiversity, tourism, agriculture, energy)". However, Bourne Leisure considers the Core Strategy should recognise that in managing these different land uses a careful and balanced approach needs to be taken between protecting and enhancing the countryside and ensuring that appropriate and attractive tourism-related facilities can be provided and existing tourism provision enhanced, in order to promote economic growth. Reference should be made to PPS4: Planning for Sustainable Economic Growth (2009) which identifies the need for greater emphasis on enhancing the rural economy, and Policy EC7, which recognises the need to support new tourism and visitor facilities in appropriate locations.	Noted.
Ms Margaret Baddeley, Nathaniel Lichfield & Partners Ltd on behalf of Bourne Leisure Ltd, Bourne Leisure Ltd	Observations	CSPA/171	Bourne Leisure notes that there is currently only one reference to tourism in the key spatial issues section in paragraph 2.21 (see above), despite the acknowledged importance of tourism as an important part of the East Riding economy (para. 8.35). Moreover, paragraph 1.4.1 of the Draft Planning for Tourism Accommodation Guidance recognised the need to monitor and enhance the diversity, quality and sustainability of the tourism offer in order to ensure that the sector remains competitive. The Company considers that the Core Strategy should fully recognise the existing and potential importance of tourism to the East Riding. Whilst tourism is discussed in more detail in Section 8 of the document, the Company considers that there is greater scope to recognise the importance of tourism to the economic growth of the area and the potential scope for	Noted.

			<p>promoting tourism as a means of regenerating areas identified as currently 'exhibiting features of deprivation' such as Bridlington and Withernsea (para 2.18). This focussed approach would be entirely in line with guidance set out in CLG's Good Practice Guide Planning for Tourism (May 2006), which highlights the role of tourism in: acting as a focus for regeneration; providing a catalyst for growth in an area; providing opportunities for retraining for the resident workforce; and helping to maintain and expand underused sports and recreation facilities.</p>	
Mr A J Williams, Advance Land and Planning Limited on behalf of Leonard Cheshire Disability (LCD)	Observations	CSPA/808	It is suggested that one of the priorities of the Core Strategy should also be to maintain healthy and vibrant local communities, particularly in the rural area and to seek to maintain and enhance the provision of local services and facilities. In this respect some limited development of an appropriate scale in a wider range of smaller settlements might assist.	Noted. Objectives 3 and 4 of the Draft Strategy Document pick up this theme.
Mr Geoff Prince, Geoffrey Prince Associates Ltd on behalf of Mrs Margaret Jibson,	Observations	CSPA/1184	The rural based challenges are noted and need to be transferred into deliverable policies through the allocation of sufficient housing and employment land.	Noted.

Paragraph 2.22

Consultee	Nature Of Response:	Comment ID	Response	Officer Comments
Mr Richard Borrie,	Observations	CSPA/759	Can the Council explain why it is proposing to build such large numbers of houses in areas such as Pocklington, Market Weighton, and Holme on Spalding Moor, which are a considerable distance from regional centres of employment such as York, Hull, and Leeds? This appears to be inconsistent with 2.20.	Noted. The scale and distribution of housing is discussed in Chapter 5 of the document.

Paragraph 2.23

Consultee	Nature Of Response:	Comment ID	Response	Officer Comments
Claire Harron, BNP Paribas Real Estate on behalf of Centrica Storage Limited	Support	CSPA/568	Centrica welcomes the recognition at paragraph 2.23 of the importance of the local economy to spatial planning and the need to support initiatives that improve and	Noted. Support welcomed.

(CSL)			expand it.	
Mr Richard Borrie,	Object	CSPA/760	The Core Strategy must integrate with economic strategies for York and West Yorkshire, as well as Hull. It is important that the Council understands how economic activity in all these areas, not just Hull, is reflected in demand for housing in the East Riding.	Noted.
Paragraph 2.25				
Consultee	Nature Of Response:	Comment ID	Response	Officer Comments
Mr David Renwick, East Riding Of Yorkshire Council	Observations	CSPA/991	The last sentence of the paragraph says that it does not mean that all other planning considerations (such as environmental concerns) will be dismissed, but it could go further to say succinctly how these issues would be enshrined in a sustainable approach. It may be more positive to say the economic prosperity of the East Riding relies on the social and environmental factors and that these should be enshrined in encouraging economic development so that a sustainable approach is found that does not compromise other aspects. The environment provides many ecosystems services that the economy relies e.g. biodiversity provides clean air, water and soil and also gives us food, building materials and other natural resources and services, such as pollination. Climate change effects may be ameliorated by taking a sustainable approach to design, which may also create more attractive working environments and foster greater economic investment.	Noted. The Strategy should be read as a whole and reference to this is now included in policy S1 of the Draft Strategy Document.
Mr Geoff Prince, Geoffrey Prince Associates Ltd on behalf of Mr Jon Los,	Object	CSPA/1381	Para 2.22 - 2.25 Economic Growth - We note the statement that economic growth is of paramount importance to spatial planning, given the current economic climate. It also notes that growth in the business stock has not kept pace with population growth and the vast majority of businesses remain small. It fails to note however that there are significant unfulfilled business opportunities which could be addressed if planning policy constraints were removed and the East Riding of Yorkshire Council's were more willing to work more closely with existing entrepreneurs, developers, investors and landowners to remove barriers to expansion at existing employment sites	Noted. The Draft Strategy Document includes a number of positive policies to support economic development.

			<p>which have available land, spare infrastructure capacity and potential operators of new and expanding businesses waiting to acquire new premises on attractive and well managed sites. The focus is too much on trying to bring forward major strategic sites along the A63/M62 corridor and other major new site allocations which require significant upfront investment. In the short term financial, planning and other barriers to expansion of existing sites need to be addressed, including those in the countryside.</p>	
<p>Mr Neil Manock, Neil Manock on behalf of Lady Miller,</p>	<p>Observations</p>	<p>CSPA/1727</p>	<p>Paras 2.9-2.25: The need to ensure that the Core Strategy is supported by a sound evidence base is supported. However, the identified "overarching strategic issues" do not include reference to ensuring an adequate available supply of housing land, in accordance with the requirements of PPS3. This should be recognised as essential to the scope and direction of the Core Strategy at the outset.</p> <p>Proposed Amendment; Include reference to the need to ensure an adequate available supply of land for housing in accordance with national planning guidance.</p>	<p>Noted. Objective 8 of the Draft Strategy Document addresses this.</p>
<p>Nathan Smith, Barton Willmore on behalf of Kayterm Plc</p>	<p>Support</p>	<p>CSPA/1751</p>	<p>Given the recent recession and ongoing economic difficulties, our Client considers supports paragraph 2.25 of the Core Strategy, which states that adopted policies will "need to be flexible enough to respond to and enable economic activity to come forward where opportunities arise", subject to the satisfaction of all other planning considerations.</p>	<p>Noted. Support welcomed.</p>

Chapter 3 – Visions and Objectives

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Question I				
Consultee	Nature Of Response:	Comment ID	Response	Officer Comments
Mr A J Williams, Advance Land and Planning Limited on behalf of Leonard Cheshire Disability (LCD)	Observations	CSPA/809	It is suggested that some limited development of an appropriate scale in a wider range of smaller settlements would not conflict the aim "To sustain and create thriving, vibrant and sustainable communities in which everyone can enjoy a high quality of life', indeed new development may actually assist in achieving this aim.	Comments noted.
Ms Diana Sandy,	Observations	CSPA/784	The phrase 'High Quality of Life' sounds good but what does it actually mean in these changing times and needs?	'High Quality of Life' is a broad term which is taken to mean that people are able to experience a good standard of living.
Ms Diana Sandy,	Observations	CSPA/785	Where has the date 2026 come from? 'Economically prosperous' is a catch all phrase that is relatively meaningless in the current climate. You cannot grow an economy without exploiting the planet or something or someone else yet further.	Comments noted. It is standard practice for a Local Plan to cover a 15 year period.
Mr Dan Mitchell, Barton Willmore on behalf of Mr Paul Butler, Barratt and David Wilson Homes	Support	CSPA/174	Barratt and David Wilson Homes generally supports the 'East Riding LDF Vision' statement in paragraph 3.6. In particular, our client agrees that most new development should be focused on the Major Haltemprice Settlement and on the East Riding's Principal Towns and Local Service Centres.	Support noted and welcomed.
Mr Dan Mitchell, Barton Willmore on behalf of Mr Paul Butler, Barratt and David Wilson Homes	Support with conditions	CSPA/175	2) However, national planning policy such as PPS3 stipulates that a whole range of types of development needs to be considered to create strong, vibrant and sustainable communities. As currently drafted, the 'East Riding LDF Vision' only refers to economic opportunities, services and facilities and therefore this needs to be expanded to incorporate all types of development as addresses in paragraph 16 of PPS1.	Comments noted. The Local Plan vision has been amended to reflect these comments.
Mr Dan Mitchell, Barton Willmore on behalf of Mr Paul Butler, Barratt and David Wilson Homes	Support with conditions	CSPA/177	5) Beverley- with regard to Beverley statement on page 18, our client generally supports the content of the statement given that the population will grow and that there will need to be a sufficient provision of housing. Whilst the Core Strategy looks to address this by locating new housing on previously developed land, much of the provision will need	Comments noted. The place statements provide a broad overview of how a place will change over the plan period. These changes suggested for Bridlington are too detailed to be appropriate within the place statement. The place statement for Driffield has been

			<p>to be accommodated on appropriate Greenfield sites. Beverley will need to provide a range of Greenfield opportunities to meet its growth needs.</p> <p>6) Bridlington- In light of the councils most recent Landscape Character Assessment (LCA) produced in 2005, our client considers that the Bridlington statement should address the need to develop a high quality landscape edge to the western edge of Bridlington to reinforce and enhance the setting of the Wolds. For example, well designed housing developments t the west of Bridlington could provide much needed landscape improvements which would provide a much wider benefit for Bridlington and the Wolds.</p> <p>Our client therefore requests that an extra paragraph should be added to the Bridlington Statement as follows: The western urban edge of Bridlington will have been better integrated with the rural landscape and the Wolds Valley landscape through well designed development high quality landscape provision.</p> <p>7) Driffield- Our client generally supports this statement, however, wishes to clarify the third paragraph. This statement correctly identifies that a small number of sustainably located Greenfield sites will have contributed to meeting housing needs in this part of the East Riding. We also therefore suggest that the reference to Alamein Barracks in paragraph three of the Driffield Statement is removed as set out below: Whilst there will have been significant opportunities for using previously developed land, including the redevelopment of the vacant Alamein barracks site, a small number of sustainably located Greenfield sites will have contributed to meeting housing needs in this part of East Riding.</p>	<p>amended to reflect these comments.</p> <p>The Place Statements were subject to further consultation through the 'Core Strategy Further Consultation' (October 2011).</p>
<p>Mr Michael Edgar, Development Land & Planning Consultants on behalf of Strategic Land Planning Trust</p>	<p>Object</p>	<p>CSPA/50</p>	<p>The vision, in some respects, is unrealistic and needs to be IMPROVED particularly in respect to the function of the Principal Towns.</p> <p>The regional role of the East Riding is relatively low and the PACS recognises the need to serve the rural community. This approach is significantly different to the metropolitan districts of South and West Yorkshire and Hull. The</p>	<p>Comments noted. Amendments to the settlement hierarchy, which include the introduction of 'Hinterland Villages' were subject to consultation through the Core Strategy Further Consultation (October 2011). However, this has not led to a change in the Place Statement as they still focus on the main</p>

		<p>function of the Principal Towns as hubs for service provision needs to be better recognised. The role of the Major Haltemprice Settlements will be determinant on the level of development that is required to support Hull. This should be clarified following the Examination into the Hull Core Strategy.</p> <p>The preference is for urban extensions to existing settlements being the means to meet most housing needs. These urban extensions are anticipated in the major settlements listed; however there are other opportunities to deliver growth which can be underpinned by the more sustainable nature of those defined settlements. An alternative approach can offer more development opportunities in sustainable locations which would underpin these existing services while and retain a focus for development rather than broaden a dispersed pattern of allocations.</p> <p>It is important that extensions to existing settlements are considered against the character of those areas. The broadening of site allocation areas to include those within a reasonable travel distance to those facilities in the Principal Towns can reduce pressure for development of good quality agricultural land or areas of high landscape value. The necessity of growth in order to meet housing demands, economic needs and the promotion of investment can be met in the alternative approach set out for expanded Spatial Planning Areas which include those hinterland settlements within close travel distances to Principal Towns. Elsewhere in the PACS a settlement being within 2 miles proximity of a higher order settlement is used as a means of discounting those settlements in that area from being defined as a Rural Service Centre or Supporting Village (Stage 2 of Figure 6). This was on the basis that rural areas needed small service hubs for the community to rely on; however, there is a fundamental gap in focusing development where sustainable settlements within close proximity to higher order service centres are not considered for development.</p> <p>The PACS recognises (para 4.44) that there has been a mixed response to this discounting process which is</p>	<p>areas of growth. The Place Statements were subject to further consultation through the 'Core Strategy Further Consultation' (October 2011).</p>
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		<p>considered further under Question 5 in the representations. However, the 2 mile proximity of a larger settlement sets a useful definition of potential Spatial Planning Areas associated with the focus of growth on those major settlements. By accommodating development closer to larger settlements it would improve the sustainability of the plan in this respect and could increase the level of development that the Principal Towns could support in satellite settlements or the surrounding hinterland.</p> <p>It is self-evident that the Principal Towns perform a sub-area role as reflected in the Core Strategy and Key Diagram. There are well established relationships with the surrounding areas in terms of the facilities and services offered which could not be offered in lower order settlements. There is then a physical and functional relationship between these settlements which is primarily based on the provision of services and facilities.</p> <p>In the hinterlands opportunities for development around the Principal Towns can accommodate population growth and underpin services by the provision of development. While the balance of development should not detract from the focus on the Principal Town itself, there is a strategic opportunity by which to focus development which will reduce travel distances to services and facilities. The accessibility of the population outside the Principal Town to those services and amenities in the sub-area centre by public transport is a substantial benefit to the overall sustainability of the East Riding</p> <p>The identification of Driffield as the focus for most new development in the sub-area of the Wolds is correct. However the opportunity for this and other Principal Towns to accommodate growth in nearby settlements as part of the spatial planning area in which development can be sustainably located needs to be recognized.</p> <p>Driffield is the administrative centre for the sub area and is accessible from the A614 which passes around west and north side of the town with the A164 entering at the southern end of the settlement. The settlement's role, in particular its connection to train services and the strategic</p>	
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		<p>road network, is a significant facet of its function as a Principal Town as is the employment opportunities associated with the town centre and key employment allocations such as Kelleythorne Industrial Estate. It clearly operates as the main administrative and retail provider for the Wolds sub-area. The rail link in particular provides a sustainable travel link between Nafferton and Driffield. This rail link connects to the wider East Riding with services to Bridlington, Scarborough, Hull and Beverley. Services from Hull provide access to the national rail network.</p> <p>Nafferton to the east clearly has a strong relationship with the services in Driffield by virtue of the rail links and limited travel times by public and private transport. In this respect Driffield benefits from a larger supporting population than just the town itself; the hinterland of the Principle Towns comprises those residents of Nafferton and other smaller settlements including Little Driffield, Kelleythorpe, Garton on the Wolds and Skerne.</p> <p>The nature of this relationship means that residents of those nearby settlements, including Nafferton, benefit from the wide range of services and facilities available in close proximity in Driffield. The nature of this relationship means that Nafferton should be considered a satellite of Driffield and part of a wider, hinterland based spatial planning area which would involve development allocations in those locations best served by amenities and facilities which by implication offers a more sustainable distribution of development.</p> <p>This approach to the focus for development has been carried out in other Authorities. Huntingdonshire District Council have recently (September 2009) adopted a Core Strategy which specifically relies upon satellite settlements (Godmanchester and Brampton) to support the services offered by Huntingdon. In that case the Inspector found such a function entirely appropriate and acceptable; a similar approach to the focus for growth in the East Riding would be appropriate and the vision for the area should be amended to reflect this intention.</p> <p>It is also important that the limited previously developed land supply in the East Riding is acknowledged. This is</p>	
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			<p>particularly the case given the changes to brownfield land definition in PPS3 as of June this year. The reduction of the already limited supply of previously developed land cannot be allowed to unduly restrict the delivery of necessary housing or economic investment. Steps must be taken to ensure that greenfield residential land allowances are delivered and safeguarding longer term sites associated with Major Haltemprice Settlements or Principal Town extensions must be able to demonstrate deliverability. If the Core Strategy is not flexible in this respect an inappropriate blockade to otherwise suitable development in the East Riding could undermine the potential to meet housing targets and deliver investment.</p> <p>To this end the following amendment is suggested:</p> <p>Driffield</p> <p>By 2026 Driffield and its associated hinterland, including the satellite settlement of Nafferton, will be the growth area for the northern area of the Wolds.</p> <p>Driffield’s role as the “Capital of the Wolds” will have been strengthened by improvements to its retail, service and leisure facilities.</p> <p>Driffield town centre will have been revitalised by new developments, with a broader range of leisure and cultural facilities set within an enhanced public realm. New employment uses will have helped to retain young people and broaden the base of the economy with higher value sectors.</p> <p>The Driffield Navigation and the Driffield Showground, together with key natural assets such as the River Hull Headwaters SSSI, will have been improved and become an important part of the visitor sector.</p> <p>Redevelopment of previously developed land, including the vacant Alamein Barracks site will have been carried out.</p> <p>Sustainably located greenfield sites in the growth area will have contributed to meeting housing needs in this part of the East Riding</p>	
Professor Ian Reid, Beswick Parish Council	Support with conditions	CSPA/80	Haltemprice Settlements: There is indeed a value in maintaining spatially distinct, serviced dormitories in the Haltemprice settlements and these have been promoted, in part, by their development along radial lines of	<p>Comments noted. The place statements have been amended to reflect these comments.</p> <p>The Place Statements were subject to further</p>

			<p>communication centred on the City of Hull. However, there are few concentric lines of communication and this places enormous pressure on the A164 for both local journeys (intra-Haltemprice) and regional and inter-regional journeys (including movements into N Lincolnshire). There needs to be an intent to improve the number of concentric lines of road communication within the Haltemprice Settlements to relieve the A164.</p> <p>Bridlington: (1) The prominent view of the Old Town as a tourist destination is questionable (except for low-intensity interests of tourists), given that (a) most tourist interest is unquestionably the beach and Harbour area (b) the geographical distance of the Old Town from the beach and Harbour and the unattractive nature of the intervening urban space (c) the lack of parking proximal to the Old Town and (d) the limited tourist facilities of the Old Town. (2) There appears to be little emphasis on the development of mid- and high-quality (i.e. price) town centre hotel accommodation that might be used to shift the town's tourist clientele away from day-trippers in association with e.g. marina activities.</p> <p>Driffield: The town should be prevented from spreading in order to promote pedestrian access to town centre facilities and this should be a stated aim of development. Removing the antediluvian image of the own centre should be a priority in making the town a sub-regional centre and this should be stated (though not in such words!). Lessons can be learned from Beverley (despite Driffield's lack of historical and architectural bases for attracting tourism and shoppers).</p>	<p>consultation through the 'Core Strategy Further Consultation' (October 2011).</p>
Mr Doug Jennings,	Support with conditions	CSPA/104	<p>Whilst the issues affecting the Haltemprice settlements are similar they should all be treated individually with policy approaches and investment decisions specifically tailored to meet their specific needs. Now the RSS has gone there is no need to classify Cottingham as part of the regional city. To do so weakens the statement that it should retain its identity. The notion of identity is more than physical separation as is implied in the statement. It is also about perception and attitude. It seems to the Society that Council decision making often merely sees Cottingham as</p>	<p>Comments noted. Separate visions have been prepared for Cottingham, Hessle and Anlaby/Willerby/Kirk Ella and were subject to public consultation, through the Core Strategy Further Consultation (October 2011).</p>

			part of the Hull urban area instead of a (historical and long standing) settlement in its own right which requires a different approach.	
Mr Alastair McIntyre, Government Office for Yorkshire and the Humber	Observations	CSPA/150	The vision for the Major Haltemprice Settlements makes a passing reference to 'urban extensions' (p.17). This may need more clarification in the Core Strategy including, for example, issues such as scale and broad location.	Comments noted.
Mr Daniel Hatcher, Barton Willmore on behalf of Church Commissioners, Church Commissioners	Support	CSPA/139	We support the draft vision and believe it is an adequate reflection of what East Riding should be in 2026.	Support noted and welcomed.
Ms Margaret Baddeley, Nathaniel Lichfield & Partners Ltd on behalf of Bourne Leisure Ltd	Support with conditions	CSPA/173	In regard to Question 1, which asks if it is an appropriate vision for East Riding, Bourne Leisure in principle supports the proposed Vision. We welcome recognition of the need to work with stakeholders and developers. However, as indicated in our previous representations, Bourne Leisure considers that reference should also be made in the first paragraph to the importance of visitors to the East Riding also enjoying a high quality of life. Furthermore, the final paragraph should be amended to recognise that new development may be needed in response to coastal erosion resulting from climate change and the loss of built assets at the coastline. Bourne Leisure supports Bridlington's aspirations to be 'a premier East Coast resort' and plans to redevelop and reinvigorate the town centre, as well as improving public transport links with its rural and coastal catchment. However, the Company considers the vision for Bridlington should incorporate reference to the aspirations of improved tourism accommodation and facilities in both Bridlington itself and its catchment.	Comments noted. The East Riding Local Plan vision has been amended to reflect comments about visitors. The vision already refers to new development minimising the risk posed by coastal change; this is considered sufficient to reflect that some development may take place in response to coastal erosion. The Place Statements for Bridlington has been amended and was subject to further consultation through the 'Core Strategy Further Consultation' (October 2011).
Mr Dan Mitchell, Barton Willmore on behalf of Mr Paul Butler, Barratt and David Wilson Homes	Support with conditions	CSPA/176	Our client also generally supports 'The Major Haltemprice Settlements' statement in paragraph 3.7. Most housing needs will need to be met through a number of various urban extensions that integrate with existing communities and public transport corridors. The Core Strategy should be looking to support sites close to the existing built up area with good existing infrastructure links. However the Core Strategy needs to address the balance between land	Comments noted.

			release in the Major Haltemprice Settlements and the open space designations. This should be reflected in the key diagram.	
Mrs Judith Macklin, Cottingham Parish Council	Object	CSPA/358	All the Haltemprice settlements are of an equal size or bigger than Driffeld and should be dealt with independently with their own specific policies.	Comments noted. Separate visions have been prepared for Cottingham, Hessle and Anlaby/Willerby/Kirk Ella and were subject to public consultation through the Core Strategy Further Consultation (October 2011).
Mr Adrian James, Barton Willmore on behalf of Lord Feoffees	Object	CSPA/301	We suggest that paragraph 2 and 3 of the Draft Statement for Bridlington is amended to state: In partnership with local land owners, Bridlington's town centre will have been radically redeveloped and reinvigorated by greatly improved shopping employment and town centre facilities, alongside public realm improvements. The town centre will have been linked to, and integrated with the harbour and its high quality marina catering for a wide range of water-based activities, including sailing and fishing. This will have created a high quality setting for the Spa and surrounding related new development. The stylish town centre will include significant new residential uses, meeting a wide range of markets. Other seaside attractions will have been improved and added to within an improved seaside attraction zone. Bridlington's outstanding 'Old Town' area will retain its existing functions, whilst also have becoming an even more important tourist destination and, with the Heritage Coast of Flamborough Head and Bempton Cliffs and Sewerby Hall, will have developed an attractive alternative coastal tourism experience.	The place statements are intended to be general statements which express aspirations about how a place may have changed by the end of the plan period, and so not detail who will be responsible for the delivery of specific elements. The Place Statements were subject to further consultation through the 'Core Strategy Further Consultation' (October 2011).
Mr Adrian James, Barton Willmore on behalf of Lord Feoffees	Object	CSPA/291	Given the radical nature of the proposals for Bridlington, we consider that the Core Strategy Vision needs to be clearer and that these proposals should be progressed in effective partnership and so-operation with local land owners.	The place statements are intended to be general statements which express aspirations about how a place may have changed by the end of the plan period, and so not detail who will be responsible for the delivery of specific elements.
Mr Adrian James, Barton Willmore on behalf of Lord Feoffees	Object	CSPA/280	As currently drafted, the vision for Bridlington is inextricably linked with a 'radical' development of the towns "shopping, employment and town centre facilities,	Comments noted. The place statements are intended to be general statements which express aspirations about how a place may

			<p>alongside public realm improvements” We are not persuaded by the justification or viability of these proposals since the evidence base is out of date and no business/viability plan has been presented. In particular, the Lords have concerns that the radical plans to redevelop the shopping area, which (as set out in the AAP) includes a relocation of the Primary Retail Area away from the Town Centre Seafront to a new shopping area. Such radical plans require full justification, and we note that the most recent retail study did not consider the retail proposals for Bridlington. Instead, they relied on a now somewhat out-dated 2006 retail assessment. This assessment is now four years old and was based on ‘boom-time’ economic predictions. It does not take into account the recent severe economic recession and as such, we consider that it is not a sound evidence base for such major proposals. Although the more recent 2009 Town Centres and Retail Study did update Bridlington’s Expenditure forecast data, we note that the base data used in this study was from 2006 (Expedia) spending data. Consequently, this data does not include the impact of the recent recession and is, therefore also out dated.</p>	<p>have changed by the end of the plan period. The place statement for Bridlington reflects the aspirations set out in the regeneration strategy for the town.</p>
Mr Adrian James, Barton Willmore on behalf of Lord Feoffees	Support	CSPA/272	<p>The general principle of the draft statement for Bridlington is considered to be acceptable and largely in line with the provisions of Policy YH5: ‘Principal Towns’ of the Regional Spatial Strategy for Yorkshire and the Humber (RSS).</p>	<p>Support noted and welcomed.</p>
Mrs Sarah Mustill, Pegasus Planning Group on behalf of Mr Jonathan Fry,	Support with conditions	CSPA/297	<p>The changes to the vision since the Issues and Option document are broadly welcomed, and make it more locally distinctive by making reference to the settlement hierarchy. The reference to deliverability is welcomed; however the importance of delivering appropriate levels of development across the East Riding could be highlighted. The reference to ‘defined’ rural settlements in the vision is vague, particularly in the context of the Council’s identification of Rural Service Centres and Supporting Villages as part of the settlement hierarchy. If these are specifically identified, along with Local Service Centres, Principal Towns and the Major Haltemprice Settlements as part of the hierarchy it is not clear why they are excluded from reference in the vision.</p>	<p>Comments noted. The East Riding Local Plan vision has been amended to reflect these comments.</p>

			<p>Furthermore, the emerging Core Strategy does not preclude small scale forms of development in `undefined' settlements as inappropriate. It is therefore not considered that the reference to `defined rural settlements' is appropriate in the wider context of the Core Strategy.</p> <p>We would suggest the following changes:</p> <p>'Appropriate levels of development will be delivered across the network of settlements in the East Riding to sustain communities and services to ensure they meet local, present and future needs, thereby minimising as much as possible the need to travel. Most new development will have been focused delivered at the Major Haltemprice Settlements and at the East Riding's Principal Towns and Local Service Centres. In the Rural Service Centres and Supporting Villages smaller scale development over the plan period will maintain the vibrancy of rural areas and sustain local services. In other settlements and the countryside development will normally be of a small scale and appropriate to the location.'</p>	
Mr Robert Falkingham,	Observations	CSPA/400	<p>In the Core Strategy, your "Vision for the East Riding" seems to think that the East Riding will simply achieve the status of economic prosperity by 2026 and the LDF will deliver the services and housing needed to service this. I think that you are seriously underestimating the importance of the LDF for DELIVERING economic prosperity. I see the LDF as a fantastic opportunity for creating wealth and prosperity in the East Riding, by actively encouraging business, targeting housing development both high density, but also lower density "executive" housing to actively encourage business people in the East Riding. After all, it is the business of these people which will create the economic prosperity which I believe is the Council's duty to try and deliver. Your mission statement makes no mention of this.</p>	The East Riding Local Plan Vision provides the starting point for the strategy. Policy H1 requires a mix of properties which respond to the needs of the East Riding.
Mr Dan Mitchell, Barton Willmore on behalf of Mr Paul Butler, Barratt and David Wilson Homes	Support with conditions	CSPA/263	<p>4) Our client supports the need for a significant reliance on urban extensions and that these should be given priority if the proposed housing target figures are to be achieved. The lead-in times for such urban extensions are considerable and therefore these sites need to vary in size and be brought forward at an early stage to contribute</p>	Comments noted.

			towards housing completions in sufficient time.	
Mrs Sarah Mustill, Pegasus Planning Group on behalf of Mr N. Muirhead,	Support with conditions	CSPA/227	See response to CSPA/297	See officer comment to CSPA/297
Mrs Sarah Mustill, Pegasus Planning Group on behalf of Zircon Flooring Ltd	Object	CSPA/357	See response to CSPA/297	See officer comment to CSPA/297
Ingrid Barton,	Support	CSPA/269	Yes	Support noted and welcomed.
Ian Smith, English Heritage Yorkshire Region	Support with conditions	CSPA/417	<p>Paragraph 3.6 - Vision: We support the proposed Vision especially the intention that the distinctiveness of the area's settlements and landscapes will have been reinforced and that the natural and built assets will have been protected and enhanced. These reflect two of the six Objectives of the LSP and national policy guidance in PPS1 and PPS5.</p> <p>Draft statements for areas of change - General: The responses to the last consultation considered that there was a need for the Core Strategy to provide a framework for addressing rural issues and for responding to needs in rural areas. Given the essentially rural nature of the East Riding, the fact that, at present, some 50% of its population live outside its major settlements, and the proposal that 18% of housing will, in future, take place in Rural Service Centres, Supporting Villages and in other rural settlements, there ought to be a Vision for the rural parts of the Plan area. Suggested amendment: Amend accordingly.</p> <p>Haltemprice settlements: We support the draft statement for the Haltemprice Settlements particularly the intention that their identities will have been maintained and that the important green spaces that separate them will have been largely protected. Haltemprice Priory, a Scheduled Monument, lies less than 500 metres from the northern edge of the built-up area of Willerby and some 700 metres from the southern edge of the built-up area of Cottingham. The development of the gap between these two settlements could harm the setting of this important archaeological site.</p> <p>Beverley: We support the intention that the distinctive character be enhanced and that the historic fabric is protected.</p>	<p>Comments noted. The Local Plan vision has been amended to reflect these comments. A separate statement for Rural Areas has not, however, been prepared as this will not be a key area of change over the plan period.</p> <p>The place statements for Beverley, Bridlington and the Haltemprice settlements have been amended to reflect these comments. The Place Statements were subject to further consultation through the 'Core Strategy Further Consultation' (October 2011).</p>

			<p>However, one of the key defining features of the settlement is the views one gets of the Minster both from within the town itself and also in prospects towards the settlement from the surrounding countryside. This element is currently lacking from the Vision. Suggested amendment: Third line amend to read:- “a managed approach to development that protects its historic fabric, landscape setting, and key views of the Minster”.</p> <p>Bridlington: Whilst we support the intention to make more of the Old Town in terms of the tourism offer, it is important that this is not achieved at the expense of the distinctive character of this part of the settlement. Suggested amendment: Third Paragraph - Amend the beginning to read:- “The elements which contribute to the distinctive character of Bridlington’s Old Town will have been preserved and enhanced and the area will have become...etc”</p>	
Joan Burnett, Conservation Society of Yorkshire Derwent	Object	CSPA/553	I note that the emphasis is to be on building in the Haltemprice and Holderness areas. I would point out that the drawback there is their remoteness from the major road network. The Vale of York area, by contrast, is well connected to the A64 and M62. This is a crucial point which should not be overlooked, as is the proximity to York, which is the city with the greatest influence on the area.	Comments noted.
Mr John Pilgrim, Yorkshire Forward	Support	CSPA/424	We support the visions outlines for the sub-areas of the district, and welcome their alignment with the renaissance plans that have been prepared in parts of the district. Whilst the overall East Riding LDF vision outlines that development will be focused on the Major Haltemprice Settlements and the on the East Riding’s Principal Towns and Local Service centres, this could be made more place specific by reflecting the key roles different settlements play, such as the role Bridlington plays as a centre for tourism within the District. Mentioning settlements by name, and the key opportunities and challenges in the district that the Core Strategy is looking to address would increase the local distinctiveness of the overall East Riding LDF vision, and help link it up better to the individual visions developed for the larger settlements in the district. In addition, it might be helpful if the overall vision included	Support noted and welcomed. The diverse nature of the East Riding means that it is very challenging for the Local Plan vision to give details about individual settlements. To address this individual place statements have been prepared.

			a stronger view of type of economy that the Core Strategy is seeking to help bring about. This could reflect on the current economic climate, and how the Core Strategy will help to respond to the difficulties that have been brought about by the recession, as well as the role that new industries may have as part of the East Riding economy across the period of the plan.	
Mrs Sarah Mustill, Pegasus Planning Group on behalf of Mr & Mrs JH Foreman,	Object	CSPA/467	See response to CSPA/297	See officer comment to CSPA/297
Mr Garth Hanlon, Savills on behalf of St John's College, Cambridge	Support	CSPA/567	<p>We support the overarching objectives of the Vision Statement for East Riding, especially focusing the majority of development within the Major Haltemprice Settlements and the East Riding's Principal Towns including Goole. Such an approach balances the requirements for economic and housing growth with the need to incorporate the principles of sustainable development, as well as limit widespread environmental and landscape impact.</p> <p>In respect of the vision for Goole, we again support the Council's approach to bringing the town forward by building upon its existing geographical and locational strengths. These include making the most of Goole's proximity to the national transport system (most obviously its location adjacent to the M62 corridor), its historical function as a major port and the potential for further growth in trade, logistics and manufacturing (Employment Land Review - 2009)</p> <p>The delivery of further employment allocations at Goole would accord with the Council's accompanying evidence base documents, especially the Employment Land Review (2007 and 2009 update). This document states that there are requirements for up to around 100 ha of B8/ warehousing and that as such this should be provided in locations with good transport links, especially Goole and the A63/ M2 corridor.</p> <p>In addition, the vision is compatible with the Local Strategic Partnership's Communities Plan ('Our East Riding'). This document identifies the A63/ M62 corridor as the main axis for growth with development sites, including Capitol Park, Goole, helping to contribute to between 3,000 and</p>	Support noted and welcomed.

			5,000 new jobs to the area over the next 15 years. In respect of the challenges of flood risk and climate change, we support the Council's approach to locating new development (based on a sequential approach).	
Mr Adrian James, Barton Willmore on behalf of Lord Feoffees	Object	CSPA/486	Bridlington Draft Statement- the Lords have concerns that the statement should encourage effective partnership with local landowners and that references to 'radical' redevelopment be removed, sine the justification an viability of the proposals is questionable;	Comments noted. The place statement for Bridlington reflects the aspirations set out in the regeneration strategy for the town. The Place Statement for Bridlington has been refined and was subject to further public consultation through the Core Strategy Further Consultation (October 2011).
Mrs Sarah Mustill, Pegasus Planning Group on behalf of Mr and Mrs Rhodes,	Support with conditions	CSPA/518	See response to CSPA/297	See officer comment to CSPA/297
Zoe Buddle, Natural England	Support with conditions	CSPA/513	Natural England welcomes the Core Strategy Vision, which sets out clear objectives for East Riding's future until 2026. We particularly support the reference to the protection and enhancement of East Riding's natural assets. The vision could be improved further by outlining the opportunities for new biodiversity and the improvement of networks between existing habitats and green infrastructure (GI). This point also extends to the sections relating to the Haltemprice Settlements, in particular the biodiversity opportunities arising from new developments. We would welcome investment in GI alongside the other grey infrastructure listed in paragraph 2 of the 'Major Haltemprice Settlements' box. With reference to the Bridlington section, we welcome the vision to improve public transport facilities into the town centre. In addition to the town centre links it would also be worthwhile to consider the role of the coastal rights of way network in improving access to the wider natural environment for residents and tourists. The Marine & Coastal Access Act 2009, provides a duty, delivered by Natural England and the Secretary of State, to secure a long distance walking trail around the open coast of England, together with appropriate 'spreading room' en-route where people can explore and/or rest. It is envisaged that this will take approximately 10 years to achieve	Comments noted. The East Riding Local Plan Vision, and the place statements for the Major Haltemprice Settlements and Bridlington have been amended to reflect these comments. The Place Statements were subject to further consultation through the 'Core Strategy Further Consultation' (October 2011).

			nationally, therefore should be delivered in the lifetime of the Core Strategy. Improved coastal access will add to people's enjoyment of the coast and its nature, this in turn should increase visitor spending in local coastal economies like Bridlington.	
Claire Harron, BNP Paribas Real Estate on behalf of Centrica Storage Limited (CSL)	Observations	CSPA/569	The Core Strategy aims to focus most new development in the Major Haltemprice Settlements (that part of the East Riding comprising the Regional City, Anlaby, Cottingham, Hessle, Kirk Ella and Willerby). Centrica does not object to this approach provided that it does not unduly restrict necessary development within other parts of the East Riding.	Comments noted.
Mr Peter Wood,	Object	CSPA/582	Our sub area is basically rural and you give no specific details on: -How many new jobs? -How many more commuters? -How much social housing/incomers? It's all very vague	The Local Plan vision provides the starting point for the Strategy Document. Further details of the scale and distribution of growth that is planned are set out in the Spatial Strategy section and relevant sub area policies.
Antony Aspbury Associates	Support	CSPA/594	We support the vision for the East Riding and in particular the statement for Driffield where my clients are major landowners. We support the revitalisation proposals for Driffield Town Centre and the encouragement of higher value economic employment growth. The Alamein Barracks site offers a great previously-developed site regeneration opportunity and with it potentially improved access and public transport linkages between the Barracks, the employment site at Kellythorpe, The Showground, Driffield Town centre and the Railway Station.	Support noted and welcomed. The Place Statements were subject to further consultation through the 'Core Strategy Further Consultation' (October 2011).
Mr Andy Booth, Globe Cosultants Ltd	Support	CSPA/405	The vision is considered appropriate.	Support noted and welcomed.
Mrs Kathy West, Hessle Town Council	Observations	CSPA/803	Hessle is bordered to the North and West by an area currently identified as 'Open Area of Strategic Important (E4)'. Any development strategy should retain these Green Spaces between settlements and maintain the Character of the settlements. This particularly applied to the space between Hessle and Anlaby.	Comments noted. A separate vision for Hessle has been prepared (taking these comments into account) and was subject to public consultation through the Core Strategy Further Consultation (October 2011).
Miss K. E. Laister, Ferriby Conservation Society	Support	CSPA/656	The vision seems appropriate and should satisfy those who asked for more detail.	Support noted and welcomed.
Mrs Pamela Austin, Cottage	Object	CSPA/697	Vision cannot be judged appropriate or improved unless	The Local Plan vision provides the starting

Farm Neighbourhood Watch			data on identified needs given eg.. population increase etc	point for the Strategy Document. Further details of the scale and distribution of growth that is planned are set out in the Spatial Strategy section and relevant sub area policies.
Mrs Sarah Mustill, Pegasus Planning Group on behalf of Evison Farmers	Support with conditions	CSPA/648	See response to CSPA/297	See officer comment to CSPA/297
Mrs Sarah Mustill, Pegasus Planning Group on behalf of Nobern Limited	Support	CSPA/673	My client acknowledges and welcomes the inclusion of economic aspirations within the vision of the LDF. The delivery of new economic growth across the East Riding is fundamental to achieving sustainable communities.	Support noted and welcomed.
Mrs Sarah Mustill, Pegasus Planning Group on behalf of Mr K Warkup,	Support with conditions	CSPA/723	See response to CSPA/297	See officer comment to CSPA/297
Mrs Sarah Mustill, Pegasus Planning Group on behalf of Jayne Briggs,	Support	CSPA/603	See response to CSPA/297	See officer comment to CSPA/297
Mr Chris Calvert, Pegasus Planning Group on behalf of Heron Lakes (Routh) Ltd	Support	CSPA/740	My client acknowledges the inclusion of economic aspirations within the vision of the LDF.	Support noted and welcomed.
Mr Chris Calvert, Pegasus Planning Group on behalf of Mr S Goodwin and the Farnsworth Family,	Support with conditions	CSPA/626	<p>The changes to the vision since the Issues and Option document are broadly welcomed, and make it more locally distinctive by making reference to the settlement hierarchy. The reference to the role of the Principal Towns in being the main focus for new development is welcomed and gives the vision local distinctiveness.</p> <p>We would, however, suggest the following text change to the vision, to give greater emphasis on delivery: [Replace 'focused on' with 'delivered at'].</p> <p>The inclusion of statements for the settlements which will be the main focus of development is welcomed. This makes the Core Strategy more locally distinctive and provides greater clarity of the role of each settlement in terms of planned growth and regeneration.</p> <p>My clients support the vision for Bridlington as a major focus for new development and aspirations to promote its economic base. My client also welcomes the clear steer given in the statement as to how housing need in the Bridlington area will be met, through a specific combination</p>	Comments noted. The East Riding Local Plan vision has been amended to reflect these comments.

			<p>of previously developed land and greenfield urban extensions.</p> <p>The reference to deliverability is welcomed; however the importance of delivering appropriate levels of development across the East Riding could be highlighted.</p>	
Cllr Charles Bayram, ERYC	Object	CSPA/914	<p>Problems, shortfalls, matters that need solutions and are not national or general problems, but specific to that Authority, are its issues. A scoping opinion sets out all our known issues. One should then invite people to raise other issues not "already identified then show how all issues should be addressed. The end product, or the written vision statement, of any Authority must be optimistic, with its personal issues addressed, not as this statement which shows general issues. I am unsure who or how this new vision was prepared, it just appeared weeks before our Audit Commission inspection.</p> <p>The Authority should create a vision out of a draft informal scoping opinion following the process of preparing a community plan.</p> <p>The community and the Council must have ownership of both the vision and the community plan, not just the Authority. (Because of the late start the Authority is cutting corners).</p>	Comments noted. The Local Plan vision was drafted by officers based on the key spatial issues that have been identified in the East Riding. It was included as part of the Preferred Approach Core Strategy consultation document to ensure that all interested parties were able to comment on it and suggest changes prior to it being finalised.
Mrs R. Hague, Watton Parish Council	Support with conditions	CSPA/834	Agree with the idea of hierarchy - will have to be flexible though as conditions/politics/economy changes.	Comments noted.
Mrs Sarah Mustill, Pegasus Planning Group	Support	CSPA/836	The inclusion of statements for the settlements which will be the main focus of development is welcomed. Again, this makes the Core Strategy more locally distinctive and provides greater clarity of the role of each settlement in terms of planned growth and regeneration. We also welcome the clear steer given in the statements as to how housing needs will be met, through a specific combination of previously developed land, greenfield sites and sustainable urban extensions.	Support noted and welcomed.
Mrs Sarah Mustill, Pegasus Planning Group	Object	CSPA/832	See response to CSPA/297	See officer comment to CSPA/297
Mrs Sarah Mustill, Pegasus Planning Group	Support with conditions	CSPA/826	The changes to the vision since the Issues and Option document are broadly welcomed, and make it more locally distinctive by making reference to the settlement hierarchy.	Comments noted. The East Riding Local Plan vision has been amended to reflect these comments.

			<p>The reference to deliverability is welcomed; however the importance of delivering appropriate levels of development across the East Riding could be highlighted.</p> <p>Our concern with the vision is that it should not be unduly restrictive and needs strike a balance between local distinctiveness and flexibility over the plan period.</p>	
Mr John Holmes, Hull Forward	Support	CSPA/953	<p>- Major Haltemprice Settlements - we agree that existing employment sites should support the Regional City. There should however also be stated for the Bridgehead sites - complementary development here and in Hull is essential to maximise the sub-regional economy's potential.</p> <p>- Beverley - we suggest that the words 'in-line with its role and function as a Principal Town' are added to the end of the second paragraph, for clarification.</p>	<p>Comments noted. The Place Statements for the Major Haltemprice Settlements and Beverley have been refined (taking these comments into account) and subject to public consultation through the Core Strategy Further Consultation (October 2011).</p>
Mr David Renwick, East Riding Of Yorkshire Council	Support with conditions	CSPA/994	<p>We are pleased with the broad range of topics covered in the LDF Vision and also with the mention of sustainability issues such as energy, landscape, the natural environment, climate change, flood risk and coastal erosion. Overall it gives a reasonably balanced account of the key issues.</p> <p>However, we feel that the vision should give greater emphasis to the landscapes and countryside that make the East Riding the place it is and give specific mention to this and to the diverse natural environment of the area up front. This is crucial in providing the 'sense of place' that makes the East Riding what it is. We are pleased that reference is made to protection and enhancement of natural assets and also the mention made in the LDF Vision to the issues of climate change, flooding and coastal erosion.</p> <p>It is very good to see climate change mentioned in the vision, as well as minimising the need to travel for work / services, sustainable construction and low energy dependency, but it would be good to also see a positive sentence in there about renewable energy. We would also suggest that the third paragraph should also make reference to climate change adaptation as well as minimisation as the East Riding will no doubt have to take both approaches given its character, location and environmental characteristics. The following wording could be used:</p>	<p>Comments noted. The East Riding Local Plan vision has been amended to reflect these comments.</p> <p>The Local Plan vision highlights the development will have minimised the risk from climate change, and adaptation will be one form of development that contributes to this.</p>

			<p>'We will have ensured that new development has not contributed to, and has minimised the risk from climate change. Where necessary we will have worked with communities to help them adapt to the impacts of climate change, particularly flooding and coastal erosion.'</p>	
<p>Mr David Renwick, East Riding Of Yorkshire Council</p>	<p>Observations</p>	<p>CSPA/995</p>	<p>The visions for the key areas of change (major settlements) should capture the major issues with regards to a range of sustainability issues and in this urban context we would suggest the most suitable approach for this would be to emphasise the green infrastructure and the multifunctional role this plays in urban areas and their hinterlands. This would capture issues such as biodiversity, carbon sequestration, flood storage, access to green space and others. This could also include things like extended provision of allotment space or cycle routes and the safeguarding and / or extension of 'green corridors' for wildlife.</p> <p>The visions for these settlements are at present somewhat biased towards economic development and they could present a more rounded perspective reflecting the even approach taken to the overall LDF vision in Section 3.6. A short paragraph summarising environmental issues building on the current content would be good with a green infrastructure emphasis. We could help to draft this wording if required.</p>	<p>Comments noted. The place statements have been amended to reflect these comments and were subject to further consultation through the 'Core Strategy Further Consultation' (October 2011).</p>
<p>Mr Chris Calvert, Pegasus Planning Group on behalf of Mr Peter Ward, Peter Ward Homes Ltd</p>	<p>Support with conditions</p>	<p>CSPA/1427</p>	<p>The changes to the vision since the Issues and Option document are broadly welcomed, and make it more locally distinctive by making reference to the settlement hierarchy. The reference to the role of the Principal Towns in being the main focus for new development is welcomed and gives the vision local distinctiveness.</p> <p>We would, however, suggest the following text change to the vision, to give greater emphasis on delivery: [Replace 'focused on' with 'delivered at'].</p>	<p>Comments noted. The Local Plan vision has been amended to reflect these comments.</p>
<p>Mr Chris Calvert, Pegasus Planning Group on behalf of Mr Peter Ward, Peter Ward Homes Ltd</p>	<p>Support</p>	<p>CSPA/1428</p>	<p>The inclusion of statements for the settlements which will be the main focus of development is welcomed. This makes the Core Strategy more locally distinctive and provides greater clarity of the role of each settlement in terms of planned growth and regeneration.</p> <p>My clients support the for Goole as a major focus for new</p>	<p>Support noted and welcomed.</p>

			development in the south west area. My client also welcomes the clear steer given in the statement as to how housing need in the Goole area will be met, through a specific combination of previously developed land and greenfield urban sites.	
Mr Chris Calvert, Pegasus Planning Group on behalf of Mr Peter Ward, Peter Ward Homes Ltd	Support with conditions	CSPA/1430	The reference to deliverability is welcomed; however the importance of delivering appropriate levels of development across the East Riding could be highlighted.	Comments noted. The East Riding Local Plan vision has been amended to reflect these comments.
Ms Maureen Bell, Bridlington & District Civic Society	Support	CSPA/1209	Yes	Support noted and welcomed.
Mrs Sarah Mustill, Pegasus Planning Group on behalf of Mr R Swales,	Support with conditions	CSPA/981	See response to CSPA/297	See officer comment to CSPA/297
Mr David Hickling, Hickling Gray Associates	Support	CSPA/1317	The Vision, which links back to the Sustainable Community Strategy (SCS), is sound and sensible - in particular the stated intention to "maintain vibrancy of rural areas"	Support noted and welcomed.
Mr A J Williams, Advance Land and Planning Limited on behalf of Leonard Cheshire Disability (LCD)	Object	CSPA/810	It is considered that the Vision focuses too heavily upon the major settlements and it is suggested that it should reflect a less restrictive approach towards development in a wider range of rural settlements.	Comments noted. The Local Plan vision has been amended to reflect these comments.
Mr Stephen Courcier, Carter Jonas LLP on behalf of C Carver Esq and Family,	Support with conditions	CSPA/1094	In general we support the Council's vision statement. However we consider that the vision is generic in nature and does not wholly reflect the local or unique characteristics of the district. The district is predominately rural in nature and this should be strongly reflected in East Riding LDF Vision. We consider that there should be a separate vision for the rural settlements of the East Riding where more than half of the population lives. This vision should set out the desired role of these settlements and how it may change over the period of the Core Strategy. We are also concerned about the third sentence, which states 'with more limited development in defined rural settlements to maintain the vibrancy of rural areas'. This sentence does not make sense and we would suggest that it states 'development in rural settlements should be of an	Comments noted. The Local Plan vision has been amended reflect these comments. A separate vision or place statement for rural areas has not been prepared, however, as it is not intended to be a key area of change over the plan period.

<p>Joanna Lee, Baker Associates on behalf of Dennis Wilkinson,</p>	<p>Observations</p>	<p>CSPA/1144</p>	<p>appropriate scale to ensure their vibrancy’.</p> <p>In terms of the Major Haltemprice Settlements we support the reference to meeting the housing needs through a number of carefully planned and managed urban extensions, and the need to retain the character of settlements and the spaces between them. However, there is a need for greater priority to be placed on these areas and the individual settlements and their role in supporting the regional city of Hull. Despite the revocation and imminent abolition of the Regional Spatial Strategy (RSS) many of the issues it raises relating to the cross boundary relationships and wider housing market area remain vitally important and will need to be addressed by this plan. The vision currently shows poor understanding of the individual settlements and their needs and ambitions. Greater recognition of the different settlement would improve the local distinctiveness of the vision. There is considerable scope for the vision to be better articulated in order to define the distinctive aspirations for different places. The complementary roles and relationships of each of the individual settlements such as Cottingham should be explored and encouraged rather than considering all the Major Haltemprice Settlements together. We suggest that individual visions are formulated for each of the settlements and as such would expect to see a specific vision for Cottingham to be included in the final Core Strategy. This would positively respond to the ‘localism’ agenda of the new coalition Government and the need to root developments firmly in the needs and aspirations of local communities.</p> <p>There should also be increased emphasis on the need to rebalance the housing numbers away from greenfield allocations in the rural areas and towards the Major Haltemprice Settlements. A more positive approach should be adopted which recognises the importance of housing growth to address some of the specific issues of the area. Recognition of the needs of all parts of the population, particularly older people which is included in the objectives, should be included in the vision.</p> <p>New Government thinking emphasises the importance of</p>	<p>Comments noted. Separate Place Statements have been prepared for Cottingham, Hessle and Anlaby/Willberby/Kirk Ella to reflect these comments, and were subject to public consultation through the Core Strategy Further Consultation (October 2011).</p>
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			plans responding to local issues and the specific needs of local people and their areas. The opportunity now presents itself for the Council to reconsider exactly what it wants for its area, and to set its own targets, as long as these are based on explicit evidence. For example this may include making provision for housing that is required locally and responding specifically to local needs for family and elderly accommodation in Cottingham.	
Mr Stephen Courcier, Carter Jonas LLP on behalf of Mr Huddleston,	Support with conditions	CSPA/1154	See response to CSPA/1094	See officer comment to CSPA/1094
Mr Geoff Prince, Geoffrey Prince Associates Ltd on behalf of Mrs Margaret Jibson,	Support with conditions	CSPA/1185	<p>We generally support the vision statement, but would like to ensure that the amount of development to be focussed on the East Riding's rural areas and settlements is determined by market forces, and not unduly limited, as this is where the East Riding's strengths lie. To prosper and for rural services to be viable, then more development is needed to sustain them and to encourage new services to be established. Also the vision statement should include reference to the need to ensure that all settlements and communities are connected/effectively integrated with the Global marketplace in which we will all be increasingly part of in our day to day living. Increasingly development patterns will not be determined by reducing the need to travel as we will rely on internet based forms of communication which will allow us to choose where to live (and not where social engineers in the public sector think we should live).</p> <p>If this section is to include sections on the Major Haltemprice Settlements, Beverley, Bridlington, Goole and Driffield, then it should also included other settlements such as Pocklington (which is no different to Driffield in terms of functions) and other important market/service centres;</p>	<p>Comments noted. The Local Plan vision has been amended to reflect these comments.</p> <p>Place Statements for each of the Local Service Centres have been drafted and were subject to public consultation through the Core Strategy Further Consultation (October 2011).</p>
Mrs Sarah Mustill, Pegasus Planning Group on behalf of Mr and Mrs Hudson,	Object	CSPA/1504	The changes to the vision since the Issues and Option document are broadly welcomed, and make it more locally distinctive by making reference to the settlement hierarchy. The reference to the role of the Principal Towns in being the main focus for new development is welcomed and gives the vision local distinctiveness.	Comments noted. The Local Plan vision has been amended accordingly.

			We would, however, suggest the following text change to the vision, to give greater emphasis on delivery: [Replace 'focused on' with 'delivered at'].	
Mrs Sarah Mustill, Pegasus Planning Group on behalf of Mr and Mrs Hudson,	Object	CSPA/1505	The inclusion of an additional vision statement for the Major Haltemprice settlements is also welcomed. Again, the focus on delivery should be reinforced in this statement and therefore we would suggest the following text change: [after "Regional City" in the first paragraph add "through the delivery of appropriate levels of new development within the Hull Housing Market Area."]	<p>Comments noted. Supporting the regeneration of the City of Hull is a reference to actions broader than just managing housing development in the Hull Housing Market Area and so for brevity the suggestion amendment has not been made.</p> <p>The Place Statements were subject to further consultation through the 'Core Strategy Further Consultation' (October 2011).</p>
Mrs Sarah Mustill, Pegasus Planning Group on behalf of Mr and Mrs Hudson,	Support	CSPA/1507	My clients support the growth of the Major Haltemprice settlements through a number of 'carefully planned and managed urban extensions...which integrate with existing communities' as set out in the vision. It is considered that by utilising a number of small and medium sized sites, the aim of protecting the green spaces which separate the Major Haltemprice Settlements can be achieved.	<p>Support noted and welcomed.</p> <p>Separate Place Statements have been prepared for Cottingham, Hessle and Anlaby/Willberby/Kirk Ella and were subject to public consultation through the Core Strategy Further Consultation (October 2011).</p>
Mark Jones, Barton Willmore on behalf of Wykeland Group Limited	Object	CSPA/1566	<p>Chapters 2 and 3 of the Draft Core Strategy set the key spatial issues and the Vision and Objectives. In reality, there is very little difference between these two chapters as both aim to provide an overview of the key spatial issues affecting the authority. We suggest that chapters 2 and 3 become combined into one simplified, streamlined, spatial vision section. In this context, we would also request that the key diagram which is currently 'hidden' at the back of the draft document is brought upfront and amended as per our comments under the appropriate subheading below.</p> <p>In respect of paragraphs 3.1 - 3.7, this part of the Plan provides the 'Vision' of East Riding as a whole. The section is confusing and identifies six 'guiding sustainability principles', a 'Vision' in the box at paragraph 3.6, and 'individual area statements' in paragraph 3.7. Additionally, 21 objectives are provided on page 20 the document, which the Council appears to bring together and check against LDF objectives and a set of principles in its matrix in</p>	<p>Chapter 3 sets out the key spatial issues for the East Riding and aims to provide context to the Local Plan. Chapter 4 then sets out an overall vision for the area and strategic objectives which focus on the key issues to be addressed. As the chapters have different, albeit related, roles it is considered appropriate that they are separate.</p> <p>The supporting text to the vision and objectives have been amended to reflect these comments. Policy A1 identifies Bridgehead as a key employment site.</p>

			<p>Table 1 on page 22. We suggest that the Council reviews this section which is overcomplicated and not clear to the reader as to what the key priorities of East Riding actually are.</p> <p>The statement regarding the major Haltemprice settlements, identifies the Humber Bridgehead employment site and its important role to support the growth of the sub regional economy. Paragraphs 4,6-4.7 of PPS 12 identify the possibility for Core Strategies to allocate 'Strategic Sites' for development. Bridgehead has previously been identified as a strategic employment site in adopted versions of JSP and the Beverley Local Plan, a position which has been suggested is retained via the Council's Employment Land Study. Whilst our client has progressed a planning application which has now been resolved to grant by Members, we would request that this box be amended to allocate Humber Bridgehead as a Strategic Site.</p>	
Mr Alex Gymer,	Observations	CSPA/1287	More emphasis should be places on the role of smaller village settlements and the protection of green space to enhance the environment etc.	Comments noted. The Local Plan vision has been amended to reflect these comments.
Mr Geoff Prince, Geoffrey Prince Associates Ltd on behalf of Mr Jon Los,	Object	CSPA/1382	<p>East Riding LDF Vision: The Vision Statement makes limited mention of economic development. It states that “growth and new development will have to be managed to ensure people have been connected to economic opportunities and services” Who will do the managing and to what effect. This sounds like a big brother approach. The vision needs to reflect the vigour, energy and innovation of local entrepreneurs/business people in creating and sustaining jobs and new employment opportunities - the role of the Council should be to facilitate (not manage) the creation of new and expanded businesses by working in partnership with local business people to remove barriers to investment; these barriers include skills training, upgrading the site infrastructure, better access, reducing amenity impacts of growth, and removing unnecessarily restrictive planning policies and conditions regarding operating hours. Also, the vision is too focussed on developing a settlement hierarchy to determine where new development including employment sites should be located. Whilst it is important that people live in communities of various sizes with shops,</p>	Comments noted. The Local Plan vision has been amended to reflect these comments. Policies EC1 and EC2 provide detail on how proposals to expand existing employment areas will be supported.

			<p>schools and other services, this does not necessarily need to apply to employment sites, which can often benefit from being located outside settlements. In particular the Vision fails to mention the economic strengths of the wider Hull-Beverley sub region; Beverley is mentioned as a Principal Town and the Major Haltemprice Settlements are identified as being part of the Regional City of Hull. However, these areas exclude the Hull-Beverley transport corridor (along the A1174), which includes the settlements of Dunswell and Woodmansey (this corridor is defined as a Core Bus Route and Strategic Highway Network on Figure 8); it has significant potential (and demand) for an increased economic role due to its location between two major urban areas, easy access to the ports in East Hull, available sites for development which include former horticultural enterprises comprising old, inefficient glasshouses and packaging sheds, spare infrastructure capacity and attractive working environments. Development along this corridor should not be considered in the context of the restrictive policies for the rural areas. ERYC should focus its energies on creating a comprehensive plan for this corridor.</p>	
Mr Chris Calvert, Pegasus Planning Group on behalf of Land and Property Bank	Object	CSPA/1457	<p>My clients' concern with the vision is that it should not be unduly restrictive and needs strike a balance between local distinctiveness and flexibility over the plan period. We would suggest the following changes to the first paragraph of the vision:</p> <p>"By 2026....Appropriate levels of development will be delivered across the network of settlements in the East Riding to sustain communities and services to ensure they meet local, present and future needs, thereby minimising as much as possible the need to travel. Most new development will have been delivered at the Major Haltemprice Settlements and at the East Riding's Principal Towns and Local Service Centres"</p>	Comments noted. The Local Plan vision has been amended to reflect these comments.
Mr Chris Calvert, Pegasus Planning Group on behalf of Land and Property Bank	Support	CSPA/1458	<p>The inclusion of statements for the settlements which will be the main focus of development is welcomed. Again, this makes the Core Strategy more locally distinctive and provides greater clarity of the role of each settlement in terms of planned growth and regeneration. We also welcome the clear steer given in the statements as to how</p>	Support noted and welcomed.

			housing needs will be met, through a specific combination of previously developed land, greenfield sites and sustainable urban extensions.	
Mr Chris Calvert, Pegasus Planning Group on behalf of Land and Property Bank	Support	CSPA/1451	The changes to the vision since the Issues and Option document are broadly welcomed, and make it more locally distinctive by making reference to the settlement hierarchy. The reference to deliverability is welcomed; however the importance of delivering appropriate levels of development across the East Riding could be highlighted.	Support noted and welcomed.
Melissa Madge, The Land and Development Practice	Support with conditions	CSPA/1467	The overall vision statements for the principle towns and major Haltemprice settlements are appropriate. The statement for Goole should, however, include the need for securing long term economic viability for the town centre through encouraging major retailers back into the town	Comments noted. The Place Statements for Goole has been amended to reflect these comments and was subject to public consultation through the Core Strategy Further Consultation (October 2011).
Mr Pete Sulley, Barton Willmore on behalf of Central Land Holdings,	Object	CSPA/1610	<p>3.1. The Vision and Objectives of a Core Strategy are a crucial element of the document itself. All of the policies and supporting text flow from these strategic objectives and they are effectively a starting point which ultimately informs the whole Core Strategy. They also align with the principles set out in 'Our East Riding - The East Riding Sustainable Community Plan 2006 - 2016 (Refresh 2010)' produced by the East Riding Local Strategic Partnership as well as the seven corporate priorities highlighted in the 'East Riding of Yorkshire Council Business Plan - 2009 Update'.</p> <p>3.2. Consequently, if the Vision and Objectives are flawed then the strategy and the policies which follow could also be flawed. This could, in turn, result in the Vision and Objectives not being successfully delivered. Ultimately, the LDF could be deemed unsound when it is scrutinised at an Examination in Public. A great deal of care therefore needs to be shown to these objectives.</p> <p>3.3. The revised vision contained within paragraph 3.6 is more robust than that advocated in the Issues and Options consultation paper. However, it is still somewhat selective. Paragraph 15 of Planning Policy Statement 1 (PPS1) states that: 'The Government is committed to developing strong, vibrant and sustainable communities and to promoting community cohesion in both urban and rural areas</p>	<p>Comments noted. The Local Plan vision has been amended to reflect these comments.</p> <p>Separate Place Statements have been prepared for Cottingham, Hessle and Anlaby/Willberby/Kirk Ella, taking these comments into account, and were subject to public consultation through the Core Strategy Further Consultation (October 2011).</p>

		<p>Paragraph 16 goes on to state that 'Development plans should promote development that creates socially inclusive communities, including suitable mixes of housing. Plan policies should [inter alia]:</p> <p>'address accessibility for all members of the community to jobs, health, housing, education, shops, leisure and community facilities.'</p> <p>3.4. It is therefore evident that, to create strong, vibrant and sustainable communities, National planning policy states that a whole range of types of development needs to be considered. The second sentence of the East Riding LDF Vision as currently drafted only refers to economic opportunities, services and facilities and therefore its scope needs to be widened to encapsulate all forms of development, including the aspects raised in paragraph 16 of PPS1 above.</p> <p>3.5. This will maximise the prospects of achieving the six guiding sustainability principles as set out in 'Our East Riding', and in particular the first of those principles, which seeks to 'Build strong and inclusive urban and rural communities which reflect our culture, now and in the future'. In addition, it will help to ensure that the East Riding LDF Vision of 'economically prosperous, vibrant and distinctive urban and rural communities in which everybody can enjoy a high quality of life' can be achieved.</p> <p>3.6 As such, the East, Riding LDF Vision as currently drafted is unsound, which could undermine the prospects of achieving the Vision, as well as harming the prospects of meeting the six sustainability principles contained in Our East Riding and the seven corporate priorities outlined in the Business Plan. Further, and in response to Question 1, it is considered that whilst the vision is appropriate to a degree it can certainly be improved.</p> <p>Proposed Change</p> <p>3.7. Consequently, for the East Riding LDF Vision to be considered sound it needs to be revised as follows, in line with paragraph 16 of PPS1:</p> <p>'By 2026, the East Riding will be characterised by economically prosperous, vibrant and distinctive urban and rural communities in which everybody can enjoy a high</p>	
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		<p>quality of life. Growth and new development will have been managed to ensure people have been connected to jobs, health, housing, education, shops, leisure and community facilities to meet their everyday needs.... ' 3.8. In the same way that the Vision and Objectives inform the 'theme' of the Core Strategy on a strategic level, the draft statements for the key areas of change can also have the same effect and therefore also need to be given appropriate consideration, so as to ensure the best possible chance to achieve the wider corporate principles and priorities outlined above.</p> <p>The Major Haltemprice Settlements</p> <p>3.9. As a primary focus for development, the statement in relation to the Major Haltemprice Settlements needs to be carefully considered so that it matches the positivity of the Vision, including the respective visions within Our East Riding and the Business Plan, and Objectives.</p> <p>3.10. Development at Anlaby, along with the other Major Haltemprice Settlements and Principal Towns, will act as a catalyst for the rest of the authority. Should development in these key areas be hindered it could have knock on implications for the rest of East Riding.</p> <p>3.11. The Major Haltemprice Settlements are considered to be part of the Regional City of Hull as confirmed in paragraph 5.4 of the RSS. Hull, and therefore Anlaby, is located within the Humber Estuary sub area and therefore Section 5 and Policy HE1 of the RSS are particularly prevalent.</p> <p>3.12. The general principle of the draft statement for the Major Haltemprice Settlements is considered to be acceptable, however it is not as positively worded as Policy HE1 of the RSS. Policy HE1 (A) states that: 'Plans, strategies, investment decisions and programmes for the Humber Estuary sub area should; 1. Transform the role of Hull/ as a Regional City, particularly through remodelling the city centre to provide more and better jobs, shops, services, public spaces and homes, and transforming residential areas to create a better mix of housing and quality environments.'</p>	
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3.13. This is the first criteria of the first policy within the Humber Estuary sub area section and, without denigrating policies later in the section or the policy itself, it is clearly a very high priority given that it is located at the outset of the sub area section.

3.14. The language utilised in the opening paragraph of the Major Haltemprice Settlements draft statement is markedly different. It states that:

'By 2026, the Major Haltemprice Settlements will have maintained their identities and supported the transformation of the wider Regional City, The high quality of life which residents enjoy will have been safeguarded and reinforced,'(our emphases)'

3.15. It is therefore evident from the above that, given the significantly more neutral language used, the Core Strategy as currently drafted does not conform with the RSS, as required by paragraph 4.50 of PPS12, and as such is not considered to be sound. Further, should the aspirations of East Riding in relation to the parts of the Regional City within their jurisdiction not match that of the RSS, there is a very real danger that the aspirations of the RSS will not be achieved.

3.16. It is interesting to note at this stage that paragraph 4.17 of the Core Strategy recognises that The Major Haltemprice Settlements provide a highly sustainable option for new development'. Policy SS2 (E) states that The Major Haltemprice Settlements will be the focus for development, commensurate with their role as part of the Regional City, whilst recognising the need to support the regeneration interventions within the City of Paragraph 6.7 of the Core Strategy acknowledges that the 'Major Haltemprice Settlements have a key role to play in meeting a significant proportion of the East Riding's housing needs and complementing development and regeneration initiatives within the rest of the Regional City,: The text in the Core Strategy, outside of the actual statement itself, is therefore significantly more positive and more reflective of regional policy.

3.17. The recent letter to all Chief Planners from the Rt Hon Mr Eric Pickles MP dated 27th May 2010 confirmed

		<p>that the new administration intended to rapidly abolish Regional Spatial Strategies. However, PINS guidance released on the 10th June 2010 confirms that RSS's still form part of the Development Plan as revocation is yet to occur.</p> <p>3.18. The letter states that a formal announcement will be made shortly and for the time being the letter should be used as a 'material planning consideration'. The letter does not change the principles of sustainable development which seek to focus development on the larger, and generally therefore the most sustainable, settlements. As such the letter is a material planning consideration which should be considered alongside many other material planning considerations. In addition, Mr Pickles' letter does not automatically outweigh all preceding policy, whether it is regional or not.</p> <p>3.19. Consequently, the text within the RSS is still a strong material consideration that needs to be afforded appropriate weight, in the light of the guidance from PINS.</p> <p>3.20. As such, the opening paragraph for the Major Haltemprice Settlements should be more positive than it is currently drafted to not only accurately reflect National Policy and the RSS, but also to maximise the opportunity of achieving the positive Vision and Objectives set out at the start of the Core Strategy, 'Our East Riding' and the 'Business Plan'.</p> <p>3.21. Such a neutral stance on such a key component could have a detrimental impact on Anlaby, as well as the other Major Haltemprice Settlements, and therefore East Riding as a whole. As such, the statement as currently drafted is unsound and, in response to Question 1, it is considered that whilst the principle of the statement is appropriate to a degree it needs to be improved substantially.</p> <p>3.22. Furthermore, given that Anlaby and the Major Haltemprice Settlements form part of the Regional City, Central Land Holdings considers that the use of the phrase 'small-scale' in the fourth paragraph is unsuitable. 'Small-scale' is not defined anywhere and can lead to ambiguity in many situations. Further, a 'larger' development, although not necessarily 'small-scale', could still be appropriate in</p>	
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		<p>some settlements, depending on the particular characteristics of the site and settlement. It is evident that Anlaby, and indeed the other Major Haltemprice Settlements have a crucial role to play as they are part of the Regional City and as such 'small-scale' development is an inappropriate constraint to impose.</p> <p>3.23. 'Inappropriate' development needs to be avoided and this can be controlled through development control decisions. For example, large retail schemes which would compromise the retail offer in Hull would be sequentially tested against PPS4 and if deemed unacceptable then they should be refused. However, the suggestion that development other than 'small-scale' should not occur within the Major Haltemprice Settlements is absurd given that they form part of the Regional City and the role and function these settlements have in shaping the whole region over the Plan period.</p> <p>3.24. A more appropriate, more positive and less restrictive phrase would be 'development that is commensurate with the role and function of the settlement' as this does not impose an arbitrary size limitation on development as a matter of principle. It is interesting to note that the first part of the fourth paragraph is positively worded and Central Land Holdings supports this.</p> <p>3.25 Further comments on Anlaby are addressed later in these representations under Policy SS8: Beverley & Central sub-area.</p> <p>Proposed Change</p> <p>3.26 Consequently for the draft statement in relation to the Major Haltemprice Settlements to be considered sound it needs to be revised as follows: 'By 2026, the Major Haltemprice Settlements will have enhanced their identities and have played a key role in the transformation of the wider Regional City by providing more and better jobs, shops, services, public spaces and homes to support and complement its role and function, The high quality of life which residents enjoy will have been improved through by creating a better mix of housing and the provision of higher quality environments.'</p>	
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			<p>3.27 In addition: 'The distinct centres of Cottingham, Hessle, Anlaby and Willerby will have been enhanced and strengthened to serve the needs of their own communities through retail, community and leisure developments that are commensurate with the role and function of the settlement, alongside improvements to the public realm.'</p>	
Mr Pete Sulley, Barton Willmore on behalf of Central Land Holdings.	Object	CSPA/1710	<p>The Vision and Objectives of a Core Strategy are a crucial element of the document itself. All of the policies and supporting text flow from these strategic objectives and they are effectively a starting point which ultimately informs the whole Core Strategy. They also align with the principles set out in 'Our East Riding - The East Riding Sustainable Community Plan 2006 - 2016 (Refresh 2010)' produced by the East Riding Local Strategic Partnership as well as the seven corporate priorities highlighted in the 'East Riding of Yorkshire Council Business Plan - 2009 Update'.</p> <p>Consequently, if the Vision and Objectives are flawed then the strategy and the policies which follow could also be flawed. This could, in turn, result in the Vision and Objectives not being successfully delivered, Ultimately, the LDF could be deemed unsound when it is scrutinised at an Examination in Public. A great deal of care therefore needs to be shown to these objectives.</p> <p>The revised vision contained within paragraph 3.6 is more robust than that advocated in the Issues and Options consultation paper. However, it is still somewhat selective. Paragraph 15 of Planning Policy Statement 1 (PPS1) states that 'The Government is committed to developing strong, vibrant and sustainable communities and to promoting community cohesion in both urban and rural areas'</p> <p>Paragraph 16 goes on to state that: 'Development plans should promote development that creates socially inclusive communities, including suitable mixes of housing. Plan policies should [inter alia] : 'address accessibility for all members of the community to jobs, health, housing, education, shops, leisure and community facilities.'</p> <p>It is therefore evident that, to create strong, vibrant and</p>	<p>Comments noted. The East Riding Local Plan vision, and the Beverley place statement, have been amended to reflect these comments.</p> <p>The Place Statements were subject to further consultation through the 'Core Strategy Further Consultation' (October 2011).</p>

		<p>sustainable communities, National planning policy states that a whole range of types of development needs to be considered. The second sentence of the East Riding LDF Vision as currently drafted only refers to economic opportunities, services and facilities and therefore its scope needs to be widened to encapsulate all forms of development, including the aspects raised in paragraph 16 of PPS1 above.</p> <p>This will maximise the prospects of achieving the six guiding sustainability principles as set out in 'Our East Riding', and in particular the first of those principles, which seeks to 'Build strong and inclusive urban and rural communities which reflect our culture, now and in the future'. In addition, it will help to ensure that the East Riding LDF Vision of 'economically prosperous, vibrant and distinctive urban and rural communities in which everybody can enjoy a high quality of life' can be achieved.</p> <p>As such, the East Riding LDF Vision as currently drafted is unsound, which could undermine the prospects of achieving the Vision, as well as harming the prospects of meeting the six sustainability principles contained in Our East Riding and the seven corporate priorities outlined in the Business Plan. Further, and in response to Question 1, it is considered that whilst the vision is appropriate to a degree it can certainly be improved.</p> <p>Proposed Change</p> <p>Consequently, for the East Riding LDF Vision to be considered sound it needs to be revised as follows, in line with paragraph 16 of PPS1:</p> <p>'By 2026, the East Riding will be characterised by economically prosperous, vibrant and distinctive urban and rural communities in which everybody can enjoy a high quality of life. Growth and new development will have been managed to ensure people have been connected to jobs, health, housing, education, shops, leisure and community facilities to meet their everyday needs...'</p> <p>Page 17, Paragraph 3.7</p> <p>3.8 In the same way that the Vision and Objectives inform the 'theme' of the Core Strategy on a strategic level, the draft statements for the key areas of change can also have</p>	
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		<p>the same effect and therefore also need to be given appropriate consideration, so as to ensure the best possible chance to achieve the wider corporate principles and priorities outlined above.</p> <p>Beverley</p> <p>As a Principal Town, and probably the most sustainable of the Principal Towns given its location, facilities, tourism offer, population and the fact that it is the County Town, the statement in relation to Beverley needs to be positive so as to match the positivity of the Vision, including the respective visions within Our East Riding and the Business Plan, and Objectives.</p> <p>Development at Beverley, along with the Major Haltemprice Settlements and the other Principal Towns, will act as a catalyst for the rest of the authority. Should development in these key areas be hindered it could have knock on implications for the rest of East Riding.</p> <p>The general principle of the draft statement for Beverley is considered to be acceptable, and is largely in line with the provisions of Policy YH5: 'Principal Towns' of the RSS. The language in relation to the town centre (second paragraph), local economy (third paragraph) and transport (fourth paragraph) is encouragingly positive, in line with Policy YH5 of the RSS.</p> <p>However, the language in relation to housing (first paragraph) is somewhat neutral, and fails to reflect the positive approach advocated in Policy YH5, which states that 'The roles of Principal Towns as accessible and vibrant places to live, work and invest should be enhanced.'</p> <p>As such, the aspiration for housing in Beverley should be more positive than it is currently drafted to not only accurately reflect National Policy and the RSS, but also to maximise the opportunity of achieving the positive Vision and Objectives set out at the start of the Core Strategy, Our East Riding and Business Plan.</p> <p>Such a neutral stance on such a key component could have a detrimental impact on Beverley, as well as the Major Haltemprice Settlements and other Principal Towns. As such, the statement as currently drafted is unsound and, in response to Question 1, it is considered that whilst the</p>	
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			<p>principle of the statement is appropriate to a degree it can certainly be improved.</p> <p>Further comments on Beverley are addressed later in these representations under Policy SS8: Beverley & Central sub-area.</p> <p>Proposed Change</p> <p>Consequently for the draft statement in relation to Beverley to be considered sound it needs to be revised as follows:</p> <p>'...The housing needs of the growing population will have been met through the re-use of previously developed land and through a number of key greenfield sites in suitable locations. There will be a sufficient range, amount, mix, type and tenure of housing, providing greater choice in the housing market, thereby making housing more affordable and more accessible.'</p>	
Mr Pete Sulley, Barton Willmore on behalf of Central Land Holdings.	Object	CSPA/1711	<p>Page 17, Paragraph 3.6</p> <p>The Vision and Objectives of a Core Strategy are a crucial element of the document itself. All of the policies and supporting text flow from these strategic objectives and they are effectively a starting point which ultimately informs the whole Core Strategy. They also align with the principles set out in Our East Riding - The East Riding Sustainable Community Plan 2006 - 2016 (Refresh 2010)' produced by the East Riding Local Strategic Partnership as well as the seven corporate priorities highlighted in the 'East Riding of Yorkshire Council Business Plan - 2009 Update'. There are also nine 'goals' in the Goole Renaissance Plan which the Core Strategy needs to help deliver.</p> <p>Consequently, if the Vision and Objectives are flawed then the strategy and the policies which follow could also be flawed. This could, in turn, result in the Vision and Objectives not being successfully delivered. Ultimately, the LDF could be deemed unsound when it is scrutinised at an Examination in Public. A great deal of care therefore needs to be shown to these objectives.</p> <p>The revised vision contained within paragraph 3.6 is more robust than that advocated in the Issues and Options consultation paper. However, it is still somewhat selective.</p>	Comments noted. The East Riding Local Plan vision has been amended to reflect these comments.

		<p>Paragraph 15 of Planning Policy Statement 1 (PPS1) states that:</p> <p>"The Government is committed to developing strong, vibrant and sustainable communities and to promoting community cohesion in both urban and rural areas</p> <p>Paragraph 16 goes on to state that:</p> <p>'Development plans should promote development that creates socially inclusive communities, including suitable mixes of housing. Plan policies should [inter alia]: address accessibility for all members of the community to jobs, health, housing, education, shops, leisure and community facilities.'</p> <p>It is therefore evident that, to create strong, vibrant and sustainable communities, National planning policy states that a whole range of types of development needs to be considered. The second sentence of the East Riding LDF Vision as currently drafted only refers to economic opportunities, services and facilities and therefore its scope needs to be widened to encapsulate all forms of development, including the aspects raised in paragraph 16 of PPS1 above.</p> <p>This will maximise the prospects of achieving the six guiding sustainability principles as set out in 'Our East Riding', and in particular the first of those principles, which seeks to 'Build strong and inclusive urban and rural communities which reflect our culture, now and in the future'. In addition, it will help to ensure that the East Riding LDF Vision of 'economically prosperous, vibrant and distinctive urban and rural communities in which everybody can enjoy a high quality of life' can be achieved.</p> <p>As such, the East Riding LDF Vision as currently drafted is unsound, which could undermine the prospects of achieving the Vision, as well as harming the prospects of meeting the six sustainability principles contained in Our East Riding, the seven corporate priorities outlined in the Business Plan and the nine goals in the Goole Renaissance Plan. Further, and in response to Question 1, it is considered that whilst the vision is appropriate to a degree it can certainly be improved.</p> <p>Proposed Change</p>	
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			<p>Consequently, for the East Riding LDF Vision to be considered sound it needs to be revised as follows, in line with paragraph 16 of PPS1:</p> <p>'By 2026, the East Riding will be characterised by economically prosperous, vibrant and distinctive urban and rural communities in which everybody can enjoy a high quality of life. Growth and new development will have been managed to ensure people have been connected [DELETE 'economic opportunities and services and facilities'] jobs, health, housing, education, shops, leisure and community facilities to meet their everyday needs...'</p>	
Mr Pete Sulley, Barton Willmore on behalf of Central Land Holdings.	Object	CSPA/1712	<p>Page 17, Paragraph 3.7</p> <p>In the same way that the Vision and Objectives inform the 'theme' of the Core Strategy on a strategic level, the draft statements for the key areas of change can also have the same effect and therefore also need to be given appropriate consideration, so as to ensure the best possible chance to achieve the wider corporate principles and priorities outlined above.</p> <p>Goole</p> <p>Goole is a Principal Town and is located on the M62/A63 corridor where the Core Strategy proposes to focus the majority of the employment land. Further, Goole is a town that is suffering from deprivation and is therefore in need of regeneration. The town is also recognised as being close to the Region's largest urban areas and is identified as the UK's most inland port (Goole is identified in the Hull and Humber Ports City Region Development Programme (CRDP) as being Britain's premier inland port). As such, the statement in relation to Goole needs to be positive so as to match the positivity of the Vision, including the respective visions within Our East Riding and the Business Plan, and Objectives.</p> <p>Development at Goole, particularly economic development, along with the Major Haltemprice Settlements and the other Principal Towns, will act as a catalyst for the rest of the authority. Should development in these key areas be hindered it could have knock on implications for the rest of East Riding.</p> <p>The general principle of the draft statement for Goole is</p>	<p>Comments noted. The Level 2 Strategic Flood Risk Assessment for Goole identifies the relative levels of flood risk in Goole.</p> <p>The Place Statement for Goole has been refined and was subject to public consultation through the Core Strategy Further Consultation (October 2011).</p>

			<p>considered to be acceptable, and is largely in line with the provisions of Policy YH5: 'Principal Towns' of the RSS. It is positively worded and recognises Goole's role as: "a major inter modal hub for trade, logistics and manufacturing' as well as stating that 'Employment in these sectors will have seen strong growth ':</p> <p>However, there is concern about the fourth paragraph in relation to flood risk and climate change. As evidenced by the Site Allocations DPD map, and the Environment Agency flood map, the majority of Goole is a high risk flood area.</p> <p>As such there is concern that the statement that "most new development will have been sited in lower risk areas ' is unachievable given the paucity of land located within 'lower risk areas':</p> <p>This could jeopardise the strategy proposed for Goole, and slow down the rate of regeneration for the town.</p> <p>Further comments on Goole are addressed later in these representations under Policy SS1 I: Goole & Humberhead Levels sub-area.</p> <p>Proposed Change</p> <p>Consequently for the draft statement in relation to Goole to be considered sound it needs to be revised as follows: 'The challenge of flood risk and climate change will have been managed appropriately [DELETE 'and most new development will have been sited in lower risk areas'] with design and layout based on flood resistance and tolerance'.</p>	
<p>Mr Pete Sulley, Barton Willmore on behalf of Trustees of the Needler Settlement,</p>	<p>Support with conditions</p>	<p>CSPA/1624</p>	<p>The Vision and Objectives of a Core Strategy are a crucial element of the document itself. All of the policies and supporting text flow from these strategic objectives and they are effectively a starting point which ultimately informs the whole Core Strategy. They also align with the principles set out in 'Our East Riding' The East Riding Sustainable Community Plan 2006 - 2016 (Refresh 2010) produced by the East Riding Local Strategic Partnership as well as the seven corporate priorities highlighted in the 'East Riding of Yorkshire Council Business Plan' 2009 Update.</p> <p>Consequently, if the Vision and Objectives are flawed then the strategy and the policies which follow could also be</p>	<p>Comments noted.</p>

flawed. This could, in turn, result in the Vision and Objectives not being successfully delivered. Ultimately, the LDF could be deemed unsound when it is scrutinised at an Examination in Public. A great deal of care therefore needs to be shown to the Vision and Objectives.

The draft statements for the key areas of change can also have the same effect and therefore also need to be given appropriate consideration, so as to ensure the best possible chance to achieve the wider corporate principles and priorities outlined above.

Beverley

As a Principal Town, and probably the most sustainable of the Principal Towns given its location, facilities, tourism offer, population and the fact that it is the County Town, the statement in relation to Beverley needs to be positive so as to match the positivity of the Vision, including the respective visions within Our East Riding and the Business Plan, and Objectives. Development at Beverley, along with the Major Haltemprice Settlements and the other Principal Towns, will act as a catalyst for the rest of the authority. Should development in these key areas be hindered it could have knock on implications for the rest of East Riding.

The Trustees therefore support the designation of Beverley as a Principal Town which will act as one of the major focus points for development. However, the final paragraph of the draft statement refers to the park and ride facility. Whilst The Trustees do not object to the principle of a park and ride facility, there are serious concerns about its location as there are more appropriate and more sustainable solutions available.

Therefore, it is considered that as the location of the park and ride as approved is inappropriate, it will not 'improve accessibility and connectivity', which are the two main objectives that the town's transport schemes are trying to achieve as highlighted in the final paragraph of the Beverley statement.

Should this be the case, then a major component of the statement for Beverley will not be achieved, casting doubt on the deliverability, and therefore soundness, of the

			<p>statement itself.</p> <p>It must be noted here that the current drafting of the statement in this regard is considered to be sound, in that a park and ride facility will 'improve accessibility and connectivity'. However, The Trustees are concerned that the location of the park and ride facility is inappropriate, therefore the mechanisms to delivery this part of the Beverley statement are flawed as opposed to the drafting itself. This is especially prevalent given that there are more appropriate and more sustainable locations for a park and ride facility available as well as the fact that funding needs to be secured, after a further detailed assessment, and this is addressed later in these representations.</p> <p>Further comments on Beverley are addressed later in these representations under Policy SS8: Beverley & Central sub-area.</p> <p>Proposed Change</p> <p>Given that the wording of the draft statement in relation to Beverley is considered to be sound in this instance no changes are proposed. However, as highlighted above as the park and ride facility is located in an inappropriate place, this will not 'improve accessibility and connectivity'.</p>	
Mr Dan Mitchell, Barton Willmore on behalf of Stuart Evison,	Object	CSPA/1644	<p>East Riding LDF Vision</p> <p>Our client objects to the currently drafted 'East Riding LDF Vision' statement in paragraph 3.6. The statement sets out that most new development should be focused on the Major Haltemprice Settlements and on the East Riding's Principal Towns and Local Service Centres. The East Riding LDF Vision fails to recognise that there are other sites which may be able to cope forward which adjoin the Regional City of Hull, but which are not necessarily in the Major Haltemprice areas.</p> <p>The Core Strategy needs to support appropriate and sustainable development and provide a framework for such sites coming forward via the Site Allocations DPD. As currently drafted, the Core Strategy does not enable well located sites that adjoin the Regional City to be released. This is contrary to the statements set out at paragraphs 2.1-2.8 which stress in detail the need to work with Hull City Council in bringing forward development and growth</p>	Comments noted. An alternative option of urban extension to the City of Hull was rejected through the Core Strategy Further Consultation (October 2011).

			that capitalises on the link with Hull City Centre. We therefore recommend the proposed East Riding LDF Vision is amended to focus most new development in the Major Haltemprice settlements [<u>UNDERLINED</u>] and the parts of East Riding that adjoin Hull. (our emphasis)	
Mr Chris Taylor, Melbourne Parish Council	Support	CSPA/1533	In respect of the overall vision for ERYC we would in general concur with your proposals	Support noted and welcomed.
Mrs Sarah Mustill, Pegasus Planning Group on behalf of Mr A Naylor,	Support with conditions	CSPA/1665	See response to CSPA/297	See officer comment to CSPA/297
Nathan Smith, Barton Willmore on behalf of Galliford Try (Strategic) Land, Galliford Try (Strategic) Land	Support with conditions	CSPA/1596	<p>The East Riding LDF Vision sets out the broad vision of the Core Strategy, which includes the overall strategy for the Core Strategy. The key objectives of the plan and consequently are based on the overall vision. Therefore if the Vision and Objectives are flawed then the strategy and the policies which follow could also be flawed. This could, in turn, result in the Vision and Objectives not being successfully delivered. Ultimately, the Core Strategy could be deemed unsound when it is scrutinised at an Examination in Public.</p> <p>Support</p> <p>In general Galliford supports the recognition by the Council that the focus for most new development will be focussed towards a number of areas which includes the East Riding's Principal Towns. Our client supports this overall strategy, which is in accordance with the adopted RSS which seeks to prioritise development towards settlements such as Beverley.</p> <p>Objection</p> <p>It is however important to take into consideration national guidance and regional policy when developing a vision. We refer to paragraph 2 of PPS3, which states that the principal aim of PPS3 is to underpin the Government's response to the Barker Review of Housing Supply and the necessary step change in housing delivery, through a new, more responsive approach to land supply at the local level. Galliford is concerned with the second paragraph of the LDF Vision which refers to "managing" growth and new development and therefore this does not reflect the principal aim of delivery, as set out in PPS3.</p>	Comments noted. The East Riding Local Plan vision has been amended to reflect these comments.

			<p>Galliford also notes that in terms of identifying suitable locations for housing development, paragraph 36 of PPS3 sets out the objective to direct housing development towards locations which offer a range of community facilities and with good access to jobs, key services and infrastructure. Our client does not believe that this objective is sufficiently referenced in the LDF Vision.</p> <p>Proposed Change</p> <p>Therefore to make the vision sound, we would recommend that the second paragraph of the East Riding LDF Vision is amended as follows: 'Growth and new development will have been delivered to ensure people have been connected to job opportunities and a range of facilities to meet their everyday needs.'</p>	
<p>Nathan Smith, Barton Willmore on behalf of Galliford Try (Strategic) Land, Galliford Try (Strategic) Land</p>	<p>Support with conditions</p>	<p>CSPA/1597</p>	<p>Vision for Beverley Support</p> <p>Galliford notes that the market town of Beverley does not have sufficient land within its existing built up area to accommodate the overall housing numbers required to address its needs. Our client therefore supports the identification of a number of key greenfield sites in suitable locations to meet the housing needs of the growing population.</p> <p>Our client believes that its site at Woodhall Way (Referred to as 'Bev 24' in the Allocations DPD) is a suitable Greenfield location, the reasons of which are briefly outlined below and are expanded upon in our representations to the Allocations DPD Document Potential Sites Consultation:</p> <ul style="list-style-type: none"> - Available: the site is within our client's control - Suitable: the site is able to deliver much needed family housing in close proximity to schools and other local services to create sustainable mixed communities. In terms of specific issues: - Flooding and Drainage: Development of part of the site could be delivered entirely within Flood Zone 1; - Traffic Generation and Access: Development of this site would not have a detrimental impact on the existing highway network and the site is able to be satisfactorily accessed; 	<p>Comments noted. The Place Statement for Beverley has been refined, taking into account these comments, and was subject to public consultation through the Core Strategy Further Consultation (October 2011).</p>

			<p>- Landscape and Visual: the site is enclosed and its development would not have an overall major negative impact on the landscape;</p> <p>- Achievable: Galliford believe there is a realistic prospect of the site being delivered in five years.</p> <p>Objection</p> <p>Galliford notes the Council's approach towards development at Beverley, which refers in the second sentence a 'managed approach to development'. Whilst Galliford considers it important to recognise Beverley's distinctive character, it is not clear from reviewing the vision for Beverley what this means. Galliford notes that the urban fabric of Beverley will change during the emerging plan period as it is a focus for development in the Council's overall growth strategy.</p> <p>Proposed Change</p> <p>Taking into consideration the above, for clarity we recommended that the second sentence is amended to read:</p> <p>'By 2026 Beverley will have strengthened its role as a market town and visitor destination with its distinctive character being enhanced, through the delivery of development whilst also ensuring its historic fabric is protected'.</p>	
<p>Mr Pete Sulley, Barton Willmore on behalf of The Kingswood Parks Development Company Ltd,</p>	<p>Support with conditions</p>	<p>CSPA/1684</p>	<p>Page 17, Paragraph 3.6 (East Riding LDF Vision)</p> <p>The Vision and Objectives of a Core Strategy are a crucial element of the document itself. All of the policies and supporting text flow from these strategic objectives and they are effectively a starting point which ultimately informs the whole Core Strategy. They also align with the principles set out in 'Our East Riding - The East Riding Sustainable Community Plan 2006 - 2016 (Refresh 2010)' produced by the East Riding Local Strategic Partnership as well as the seven corporate priorities highlighted in the 'East Riding of Yorkshire Council Business Plan - 2009 Update'.</p> <p>Consequently, if the Vision and Objectives are flawed then the strategy and the policies which follow could also be flawed. This could, in turn, result in the Vision and Objectives not being successfully delivered. Ultimately, the</p>	<p>Comments noted. The East Riding Local Plan vision has been amended to reflect these comments.</p>

		<p>LDF could be deemed unsound when it is scrutinised at an Examination in Public. A great deal of care therefore needs to be shown to these objectives.</p> <p>The revised vision contained within paragraph 3.6 is more robust than that advocated in the Issues and Options consultation paper. However, it is still somewhat selective. Paragraph 15 of Planning Policy Statement 1 (PPS1) states that:</p> <p>'The Government is committed to developing strong, vibrant and sustainable communities and to promoting community cohesion in both urban and rural areas</p> <p>Paragraph 16 goes on to state that:</p> <p>'Development plans should promote development that creates socially inclusive communities, including suitable mixes of housing. Plan policies should [inter alia] :address accessibility for all members of the community to jobs, health, housing, education, shops, leisure and community facilities.'</p> <p>It is therefore evident that, to create strong, vibrant and sustainable communities, National planning policy states that a whole range of types of development needs to be considered. The second sentence of the East Riding LDF Vision as currently drafted only refers to economic opportunities, services and facilities and therefore its scope needs to be widened to encapsulate all forms of development, including the aspects raised in paragraph 16 of PPS1 above.</p> <p>This will maximise the prospects of achieving the six guiding sustainability principles as set out in 'Our East Riding', and in particular the first of those principles, which seeks to 'Build strong and inclusive urban and rural communities which reflect our culture, now and in the future'. In addition, it will help to ensure that the East Riding LDF Vision of 'economically prosperous, vibrant and distinctive urban and rural communities in which everybody can enjoy a high quality of life' can be achieved.</p> <p>As such, the East Riding LDF Vision as currently drafted is unsound, which could undermine the prospects of achieving the Vision, as well as harming the prospects of meeting the six sustainability principles contained in Our</p>	
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			<p>East Riding and the seven corporate priorities outlined in the Business Plan. Further, and in response to Question 1, it is considered that whilst the vision is appropriate to a degree it can certainly be improved.</p> <p>Proposed Change</p> <p>Consequently, for the East Riding LDF Vision to be considered sound it needs to be revised as follows, in line with paragraph 16 of PPS1:</p> <p>'By 2026, the East Riding will be characterised by economically prosperous, vibrant and distinctive urban and rural communities in which everybody can enjoy a high quality of life. Growth and new development will have been managed to ensure people have been connected to economic opportunities and jobs, health, housing, education, shops, leisure and community facilities to meet their everyday needs'</p>	
Mr Pete Sulley, Barton Willmore on behalf of The Kingswood Parks Development Company Ltd,	Object	CSPA/1685	<p>Page 17, Paragraph 3.7</p> <p>In the same way that the Vision and Objectives inform the 'theme' of the Core Strategy on a strategic level, the draft statements for the key areas of change can also have the same effect and therefore also need to be given appropriate consideration, so as to ensure the best possible chance to achieve the wider corporate principles and priorities outlined above.</p> <p>The Major Haltemprice Settlements and Principal Towns have their own statements. It is not suggested that North Kingswood should be specifically designated within one of the above as it is one site, but given its unique position within East Riding, KPDC considers that it should be afforded specific attention, and this is set out below, including suggestions of where in the Core Strategy it should be inserted.</p> <p>North Kingswood</p> <p>It is acknowledged that Kingswood is not a Major Haltemprice Settlement, primarily as it is located within the administrative boundary of Hull. However, Kingswood itself performs as a District Centre, meeting many of the needs of Kingswood residents, as well as those of the adjacent areas of North Bransholme, Orchard Park and</p>	An alternative option of urban extension to the City of Hull was rejected through the Core Strategy Further Consultation (October 2011).

		<p>Dunswell, and in that respect performs the same role and function as Cottingham, Willerby, Anlaby, Kirk Ella or Hessle in its own right, notwithstanding which side of an administrative boundary line that it lies.</p> <p>Kingswood is located approximately 5.5km north of the City Centre of Hull and comprises approximately 375 hectares of land. It is bounded to the west by the River Hull, to the south by Wawne Drain, to the east by North Bransholme and to the north by the City's administrative boundary. For planning purposes Kingswood is split into three areas:</p> <ol style="list-style-type: none">1. Land to the north of Kesteven Way (approximately 54ha)2. The Western Development Area, known as Kingswood Parks (approximately 186ha)3. The Eastern Development Area, known as the Hull City Council land (approximately 134ha) <p>In terms of built development, Kingswood currently comprises:</p> <ul style="list-style-type: none">- approximately 2,000 houses, including about 1,000 houses to the north of Kesteven Way and about 1,000 houses at Kingswood Parks;- a District Centre and Retail Park comprising approximately 17,500 sq. metres of food and non-food retail uses including an ASDA superstore and petrol filling station (opened Christmas 1996); Comet, Boots, Matalan, Carpet Right, Brantano, Holiday Hypermarket, Next, Sports Soccer (opened October/November 2001) and Pizza Hut (opened September 1999);- a Leisure Park comprising a David Lloyd Tennis and Fitness Centre (opened 1999) a 9 screen UGC Cinema (opened May 2000), Hollywood Bowl (opened 2003), McDonalds, Frankie and Benny's, KFC, Wacky Warehouse and The Oyster Catcher Public House;- a Business Park comprising a Premier Inn (opened June 1997), Kingswood House office building and five industrial buildings comprising 11,600 sq. metres;- a primary school (Broadacre School);- associated road, drainage and other infrastructure <p>Once completed, Kingswood will comprise approximately</p>	
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		<p>5,000 houses, to be constructed in phases, with the Hull City Council land to be developed after the Western Development Area. Full permission has also recently been granted for a mixed use (A1 and A3) single storey retail unit, comprising a number of small units.</p> <p>It is therefore a sustainable, self-sufficient and self-contained community within the Regional City of Hull. It has its own identity, similar to the Major Haltemprice Settlements, and performs its own role and function in the transformation of the wider Regional City. Further development, already approved, will increase the choice and offer available, thereby increasing its self-sufficiency and sustainability. Indeed, Hull City Council considers Kingswood to be one of the primary focuses for development within its authority as it provides a choice of dwelling types and sizes and an offer that was previously lacking in Hull, being family housing. Given its importance to Hull, the City Council is proposing an Area Action Plan (AAP) for the part of Kingswood that lies within Hull's administrative boundary.</p> <p>Consequently, Kingswood plays a similar role and function to the Major Haltemprice Settlements. This is supported by the fact that, historically, development has always been focussed on the urban area of Hull, which has always included the Major Haltemprice Settlements. As Kingswood constitutes part of the urban area of Hull, and as it performs a similar role and function to the Major Haltemprice Settlements, it follows that development at North Kingswood should be considered in the same vein as development at the Major Haltemprice Settlements.</p> <p>It is not considered necessary to introduce a whole new strategy within the Preferred Approach Core Strategy to address North Kingswood, given it is a relatively small component within East Riding and that its development is reliant on the progress of development at Kingswood therefore it is a consideration of its longer term potential. However, appropriate consideration needs to be shown to its clearly unique situation in relation to Kingswood and cross border matters between East Riding and Hull and therefore a specific paragraph should be included within</p>	
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		<p>the Core Strategy to address it.</p> <p>Further, and given the conclusion reached above that Kingswood plays a similar role and function to the Major Haltemprice Settlements, and that it forms part of the urban area of Hull as per the Major Haltemprice Settlements, it is evident that many of the principles that underpin the strategy for development at the Major Haltemprice Settlements are suitable for development at Kingswood.</p> <p>Therefore, the proposal to develop at North Kingswood, as an extension to Kingswood (which serves Hull), follows the same principles as an extension to, for example, Anlaby, which also serves Hull. It therefore follows that development at North Kingswood should enjoy the same positive policy framework that is applicable to the Major Haltemprice Settlements (recognising its role as one particular site and therefore it will not be appropriate to all types of development that are proposed to be located towards the Major Haltemprice Settlements).</p> <p>Consequently, it would be appropriate to include reference to North Kingswood alongside the Major Haltemprice Settlements, but recognising its different offer, and a suggested paragraph is included below under the 'Proposed Change' section. Should it be considered inappropriate to insert a North Kingswood paragraph alongside the Major Haltemprice Settlements other possible locations for it are included later in these representations.</p> <p>It must also be borne in mind that as North Kingswood is only one site, and that an extension of Kingswood is not possible elsewhere, its development will not undermine East Riding's spatial strategy; indeed it could relieve some of the pressure on the Major Haltemprice Settlements, At the same time it follows the principles of the Core Strategy, in particular that of the Major Haltemprice Settlements, but recognising its role alongside those settlements as not directly comparable to them in all facets. North Kingswood is a unique situation within East Riding. Finally in this regard, the consideration of North Kingswood as a limited extension to Kingswood follows East Riding's strategy of aligning its development with that</p>	
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		<p>of Hull, although not in terms of the timing of delivery and the 'Stepped Growth' approach as previously stated in these representations. It also aligns with the proposed Kingswood AAP.</p> <p>Given the above, it is considered necessary to make representations here in relation to East Riding's strategy for the Major Haltemprice Settlements, with a view to considering North Kingswood in the same vein as the Major Haltemprice Settlements but, as mentioned above, with only the one site at North Kingswood in mind. It must be reiterated here that KPDC is not seeking to include North Kingswood within the Major Haltemprice Settlements, merely recognising its relationship with Kingswood, which plays a similar role to the Major Haltemprice Settlements. As such, the inclusion of a North Kingswood paragraph should not necessarily sit alongside the Major Haltemprice Settlements statement.</p> <p>The Major Haltemprice Settlements</p> <p>As a primary focus for development, the statement in relation to the Major Haltemprice Settlements needs to be carefully considered so that it matches the positivity of the Vision, including the respective visions within Our East Riding and the Business Plan, and Objectives.</p> <p>Development at the Major Haltemprice Settlements and Principal Towns, and at North Kingswood later in the Plan period depending on progress at Kingswood, will therefore act as a catalyst for the rest of the authority. Should development in these key areas be hindered it could have knock on implications for the rest of East Riding.</p> <p>The Major Haltemprice Settlements are considered to be part of the Regional City of Hull as confirmed in paragraph 5.4 of the RSS. Hull, and therefore North Kingswood, is located within the Humber Estuary sub area and therefore Section 5 and Policy HE1 of the RSS are particularly prevalent.</p> <p>The general principle of the draft statement for the Major Haltemprice Settlements is considered to be acceptable, however it is not as positively worded as Policy HE1 of the RSS. Policy HE1 (A) states that:</p> <p>'Plans, strategies, investment decisions and programmes for</p>	
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		<p>the Humber Estuary sub area should:</p> <p>I. Transform the role of Hull as a Regional City, particularly through remodelling the city centre to provide more and better jobs, shops, services, public spaces and homes, and transforming residential areas to create a better mix of housing and quality environments.'</p> <p>This is the first criteria of the first policy within the Humber Estuary sub area section and, without denigrating policies later in the section or the policy itself, it is clearly a very high priority given that it is located at the outset of the sub area section.</p> <p>The language utilised in the opening paragraph of the Major Haltemprice Settlements draft statement is markedly different. It states that:</p> <p>'By 2026, the Major Haltemprice Settlements will have maintained their identities and supported the transformation of the wider Regional City. The high quality of life which residents enjoy will have been safeguarded and reinforced.'(our emphases)'</p> <p>It is therefore evident from the above that, given the significantly more neutral language used, the Core Strategy as currently drafted does not conform with the RSS, as required by paragraph 4.50 of PPS12, and as such is not considered to be sound. Further, should the aspirations of East Riding in relation to the parts of the Regional City within its jurisdiction not match that of the RSS, there is a very real danger that the aspirations of the RSS will not be achieved.</p> <p>It is interesting to note at this stage that paragraph 4.17 of the Core Strategy recognises that The Major Haltemprice Settlements provide a highly sustainable option for new development. Policy SS2 (E) states that 'The Major Haltemprice Settlements will be the focus for development, commensurate with their role as part of the Regional City, whilst recognising the need to support the regeneration interventions within the City of Hull'. Paragraph 6.7 of the Core Strategy acknowledges that the 'Major Haltemprice Settlements have a key role to play in meeting a significant proportion of the East Riding's housing needs and complementing development and regeneration initiatives</p>	
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within the rest of the Regional City.. The text in the Core Strategy, outside of the actual statement itself, is therefore significantly more positive and more reflective of regional policy.

The recent letter to all Chief Planners from the Rt Hon Mr Eric Pickles MP dated 27th May 2010 confirmed that the new administration intended to rapidly abolish Regional Spatial Strategies. However, PINS guidance released on the 10th June 2010 confirms that RSS's still form part of the Development Plan as revocation is yet to occur.

The letter states that a formal announcement will be made shortly and for the time being the letter should be used as a 'material planning consideration'. The letter does not change the principles of sustainable development which seek to focus development on the larger, and generally therefore the most sustainable, settlements. As such the letter is a material planning consideration which should be considered alongside many other material planning considerations. In addition, Mr Pickles' letter does not automatically outweigh all preceding policy, whether it is regional or not.

Consequently, the text within the RSS is still a strong material consideration that needs to be afforded appropriate weight, in the light of the guidance from PINS. As such, the opening paragraph for the Major Haltemprice Settlements should be more positive than it is currently drafted to not only accurately reflect National Policy and the RSS, but also to maximise the opportunity of achieving the positive Vision and Objectives set out at the start of the Core Strategy, 'Our East Riding' and the 'Business Plan'. Such a neutral stance on such a key component could have a detrimental impact on North Kingswood, as well as the Major Haltemprice Settlements, and therefore East Riding as a whole. As such, the statement as currently drafted is unsound and, in response to Question 1, it is considered that whilst the principle of the statement is appropriate to a degree it needs to be improved substantially.

Furthermore, given that Kingswood and the Major Haltemprice Settlements form part of the Regional City, KPDC considers that the use of the phrase 'small-scale' in

		<p>the fourth paragraph is unsuitable. 'Small-scale' is not defined anywhere and can lead to ambiguity in many situations. Further, a 'larger' development, although not necessarily 'smallscale', could still be appropriate in some settlements, depending on the particular characteristics of the site and settlement. It is evident that Kingswood, and indeed the Major Haltemprice Settlements, have a crucial role to play as they are part of the Regional City and as such 'small-scale' development is an inappropriate constraint to impose.</p> <p>'Inappropriate' development does need to be avoided and this can be controlled through development control decisions. For example, large retail schemes which would compromise the retail offer in Hull would be sequentially tested against PPS4 and if deemed unacceptable then they should be refused. However, the suggestion that development other than 'small-scale' should not occur within the Major Haltemprice Settlements is absurd given that they form part of the Regional City and the role and function these settlements have in shaping the whole region over the Plan period.</p> <p>A more appropriate, more positive and less restrictive phrase would be 'development that is commensurate with the role and function of the settlement' as this does not impose an arbitrary size limitation on development as a matter of principle. It is interesting to note that the first part of the fourth paragraph is positively worded and KPDC supports this.</p> <p>Further comments on North Kingswood are addressed later in these representations under Policy SS8: Beverley & Central sub-area.</p> <p>Proposed Change</p> <p>Consequently for the draft statement in relation to the Major Haltemprice Settlements to be considered sound it needs to be revised as follows:</p> <p>'By 2026, the Major Haltemprice Settlements will have enhanced their identities and have played a key role in [DELETE 'supported'] the transformation of the wider Regional City by providing more and better jobs, shops, services, public spaces and homes to support and</p>	
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		<p>complement its role and function. The high quality of life which residents enjoy will have been improved through by creating a better mix of housing and the provision of higher quality environments [DELETE 'safeguarded and reinforced'].</p> <p>In addition:</p> <p>'The distinct centres of Cottingham, Hessle, Anlaby and Willerby will have been enhanced and strengthened to serve the needs of their own communities through [DELETE 'small scale'] retail, community and leisure developments that are commensurate with the role and function of the settlement, alongside improvements to the public realm.'</p> <p>Finally, in relation to Kingswood, and North Kingswood in particular, the following paragraph should be inserted:</p> <p>'Kingswood is a new mixed community which continues to develop, providing housing, employment, leisure, retail and community facilities. It is an important, strategic urban extension with its own identity which has a vital role to play in supporting and transforming the Regional City of Hull and as such plays a similar role to that of the Major Haltemprice Settlements. Hu// City Council is also proposing a specific Area Action Plan for Kingswood given its strategic importance. Opportunities to expand Kingswood into East Riding (North Kingswood) should be reviewed throughout the Plan period, showing consideration to its unique situation within the East Riding, the phasing of development within Kingswood so as to ensure an extension to Kingswood within East Riding is not isolated and the need to maintain a distinct separation between Kingswood and Wawne.'</p> <p>It is not considered appropriate to include this paragraph within the Major Haltemprice Settlements statement therefore an appropriate location could be as a stand alone paragraph before the existing paragraph 3.8.</p> <p>Alternatively, it may be more appropriate to include it after paragraph 4.19 in Chapter 4 of the Core Strategy, under a sub heading under the Major Haltemprice Settlements section, or even under a stand alone section between the Major Haltemprice Settlements and Principal Towns</p>	
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			sections in Chapter 4. In any event, Policy SS2 would need to be revised accordingly and this is dealt with below under Chapter 4.	
Mr Pete Sulley, Barton Willmore on behalf of Humber Growers/Shirethorn Ltd	Object	CSPA/1697	See response to CSPA/1684	See officer comment to CSPA/1684
Ms Nichola Traverse-Healy, Barton Willmore on behalf of The Bridlington Harbour Commissioners	Object	CSPA/1879	<p>The general principle of the draft statement for Bridlington is considered to be acceptable and largely in line with the provisions of Policy YH5: 'Principal Towns' of the Regional Spatial Strategy for Yorkshire and the Humber (RSS). The Vision promotes the regeneration' of Bridlington and is enthusiastic about the role the town can play as one of the premier resorts along the East Coast.</p> <p>Integral to the success of this regeneration process and the town's future will be to secure the continued operation of the Harbour. The Harbour at Bridlington has been in existence since 15th century and is still a successful fishing port, which also houses private yachts and boats. As the Harbour continues to play a key role in Bridlington's economy it is important that future proposals and policies sufficiently take into account the Harbour's historical heritage and operational requirements.</p> <p>As outlined in Section 1 [of the response], the Commissioners do not object to the principle of a Marina at Bridlington provided that it is of an appropriate scale and does not have an adverse impact on the Commissioners ability to fulfil their statutory and other duties. The Commissioners objected to the 'Second Preferred Options Draft Bridlington Town Centre Area Action Plan' and 'Draft Bridlington Supplementary Planning Document' as the plans could not meet the operational requirements of both the Harbour and Marina as well as the development of a hotel, houses, retail and leisure facilities and car parking. Furthermore in the absence of any kind of business plan or guarantee of available funds over the plan period, the 'Commissioners were concerned whether the scale of development proposed in the AAP and SPD was financially viable.</p> <p>In terms of the Preferred Options Core Strategy, the</p>	<p>Comments noted. The place statement for Bridlington has been amended to reflect these comments.</p> <p>The Place Statements were subject to further consultation through the 'Core Strategy Further Consultation' (October 2011).</p>

			<p>Commissioners are concerned that the importance of the Harbour to Bridlington is not reflected in the Draft Statement. To improve the Statement a balance needs to be achieved between protecting the harbour and allowing for a high quality marina which is appropriate in scale. This stance is reiterated in the RSS which states that the coastal towns in the Eastern Sub Area, including Bridlington, 'should be the focus for smaller scale economic and housing developments' (para 4.72). Therefore a change in the Statement could help to ensure a Vision which is deliverable and will ultimately be of benefit to Bridlington. On a more detailed note, the draft Statement suggests that the town centre is not linked to, or integrated, with the Harbour. This is not the case, as there are already a number of vehicular and pedestrian routes between the town centre and the harbour. The Commissioners accept that these linkages can always be improved and suggest that the draft Statement is amended to reflect this aspiration. Having regard to the above, we suggest that paragraph 2 and 3 of the Draft Statement for Bridlington is amended to state:</p> <ul style="list-style-type: none"> - [Replace "The town centre will have been linked to, and integrated with the harbour and its high quality marina catering..." with "The setting and efficient operation of the harbour will be protected and links to the town centre will be improved. Proposals for a high quality marina will be progressed to cater..."] - [Add "...and harbour..." after "...'Old Town' area..."] 	
Mr Neil Manock, Neil Manock on behalf of Lady Miller,	Support	CSPA/1728	The broad vision for the East Riding and statements for the major settlements is supported.	Support noted and welcomed.
Mr Dan Mitchell, Barton Willmore on behalf of Mr Paul Butler, Barratt and David Wilson Homes	Support with conditions	CSPA/1840	<p>Barratt and David Wilson Homes generally supports the "East Riding LDF Vision" statement in paragraph 3.6. In particular, our client agrees that most new development should be focussed on the Major Haltemprice Settlements and on the East Riding's Principal Towns and Local Service Centres.</p> <p>However, national planning policy such as PPS3 stipulates that a whole range of types of development need to be considered to create strong, vibrant and sustainable</p>	Comments noted. The East Riding Local Plan vision has been amended to reflect these comments.

			<p>communities. As currently drafted, the "East Riding LDF Vision" only refers to economic opportunities, services and facilities and therefore this needs to be expanded to incorporate all types of development as addressed in paragraph 16 of PPS1.</p> <p>We therefore recommend the proposed East Riding LDF Vision is amended as follows: [Replace "...economic opportunities and services and facilities..." with "...jobs, health, housing, education, shops, leisure and community facilities..."]</p>	
Mr Dan Mitchell, Barton Willmore on behalf of Mr Paul Butler, Barratt and David Wilson Homes	Support with conditions	CSPA/1841	<p>Our client also generally supports "The Major Haltemprice Settlements" Statement in paragraph 3.7. Most housing needs will need to be met through a number of various urban extensions that integrate with existing communities and public transport corridors. The Core Strategy should be looking to support sites close to the existing built up area with good existing infrastructure links. However the Core Strategy needs to address the balance between land release in the Major Haltemprice Settlements and the open space designations.</p>	Comments noted.
Mr Dan Mitchell, Barton Willmore on behalf of Mr Paul Butler, Barratt and David Wilson Homes	Support	CSPA/1842	<p>With regard to the Beverley Statement on page 18, our client generally supports the content of the statement given that the population will grow and that there will need to be a sufficient provision of housing. Whilst the Core Strategy looks to address this by locating new housing on previously developed land, much of the provision will need to be accommodated on appropriate greenfield sites. Beverley will need to provide a range of greenfield opportunities to meet its growth needs.</p>	Comments noted.
Mr Dan Mitchell, Barton Willmore on behalf of Mr Paul Butler, Barratt and David Wilson Homes	Object	CSPA/1843	<p>In light of the Councils most recent landscape Character Assessment (LCA) produced in 2005, our client considers that the Bridlington Statement should address the need to develop a high quality landscape edge to the western edge of Bridlington to reinforce and enhance the setting of the Wolds. For example, well designed housing developments to the west of Bridlington could provide much needed landscape improvements which would provide a much wider benefit for Bridlington and the Wolds. Our client therefore requests that an extra paragraph should be added to the Bridlington Statement as follows: [Additional</p>	The place statements provide a broad overview of how a place will change over the plan period. The proposed changes are too detailed for the place statement.

			6th paragraph to state "The western urban edge of Bridlington will have been better integrated with the rural landscape and the Wolds Valley landscape through well designed development delivering high quality landscape provision."].	
Mr Dan Mitchell, Barton Willmore on behalf of Mr Paul Butler, Barratt and David Wilson Homes	Object	CSPA/1844	Our client generally supports this statement, however, wishes to clarify the third paragraph. This statement correctly identifies that a small number of sustainably located greenfield sites will have contributed to meeting housing needs in this part of the East Riding. The Alamein Barracks is isolated and separated from the main built up settlement of Driffield. It is important that the Core Strategy directs new housing to the most sustainable sites in Driffield where they will form part of the main built up area. We therefore suggest that the reference to Alamein Barracks in paragraph three of the Driffield Statement is removed as set out below: [Delete "...including the redevelopment of the vacant Alamein Barracks site,..."].	The Place Statement recognised that opportunities for using previously developed land, and sustainable located greenfield sites, will have contributed to meeting housing requirements in Driffield.
Mr Pete Sulley, Barton Willmore on behalf of David Watts,	Object	CSPA/1783	See response to CSPA/1684	See officer comment to CSPA/1684
Mr John Brown, East Riding of Yorkshire Rural Partnership	Object	CSPA/1898	Could it be considered that the final LDF document should have part of the vision statement strengthened to read as follows: 'The East Riding's Principal Towns and Local Service Centres with development policies in defined rural settlements that maintains the vibrancy of rural areas and responds to new rurality and land based economic opportunities that will emerge in the next decade'	Comments noted. The Local Plan vision has been amended to give more emphasis to rural areas and reflect the more flexible approach being taken through the Strategy Document.
Mr Dave Evans, Humber Archaeology Partnership	Support	CSPA/2239	East Riding Vision - We support the proposed Vision especially the intention that the distinctiveness of the area's settlements and landscapes will have been reinforced and that the natural and built assets will have been protected and enhanced. These reflect two of the six Objectives of the LSP and national policy guidance in PPS1 and PPS5.	Support noted and welcomed.
Mr Dave Evans, Humber Archaeology Partnership	Other	CSPA/2240	The responses to the last consultation considered that there was a need for the Core Strategy to provide a framework for addressing rural issues and for responding to needs in rural areas. Given the essentially rural nature of	Comments noted. The East Riding Local Plan vision has been amended to give more emphasis to rural areas. However, a vision/place statement for rural areas has been

			<p>the East Riding, the fact that, at present, some 50% of its population live outside its major settlements, and the proposal that 18% of housing will, in future, take place in Rural Service Centres, Supporting Villages and in other rural settlements, there ought to be a Vision for the rural parts of the Plan area.</p> <p>The Major Haltemprice Settlements. We support the draft statement for the Haltemprice Settlements, particularly the intention that their identities will have been maintained, and that the important green spaces that separate them will have been largely protected. Haltemprice Priory, a Scheduled Monument, lies less than 500 metres from the northern edge of the built-up area of Willerby, and some 700 metres from the southern edge of the built-up area of Cottingham. The development of the gap between these two settlements could harm the setting of this important archaeological site.</p> <p>Beverley. We support the intention that the distinctive character be enhanced and that the historic fabric is protected. However, one of the key defining features of the settlement is the views that one gets of the Minster and of St Mary's, both from within the town itself, and also in prospects towards the settlement from the surrounding countryside. This element is currently lacking from the Vision</p> <p>Bridlington. Whilst we support the intention to make more of the Old Town in terms of the tourism offer, it is important that this is not achieved at the expense of the distinctive character of this part of the settlement.</p>	<p>produced as they will not be a focus for change over the plan period,</p> <p>The Place Statements for each of the Major Haltemprice Settlements, Beverley and Bridlington have been amended, to reflect these comments, and were subject to public consultation through the Core Strategy Further Consultation (October 2011).</p>
<p>Nathan Smith, Barton Willmore on behalf of Kayterm Plc</p>	<p>Support with conditions</p>	<p>CSPA/1752</p>	<p>East Riding LDF Vision</p> <p>Overall, our Client supports the East Riding LDF Vision set out in Chapter 3 of the Core Strategy Preferred Approach document, which seeks to focus the majority of new development on the Major Haltemprice Settlements and Principal Towns. Notwithstanding this support, our Client also considers that despite attempts to address comments about generality and lack of distinctiveness of the Vision at the Issues and Options stage, the Vision is still too generic and could in fact apply to any area. Our Client considers that the Vision needs to include information on what</p>	<p>Comments noted. The East Riding Local Plan vision has been amended to reflect these comments.</p> <p>Place Statements for each of the Local Service Centres (along with revised statements for the Major Haltemprice Settlements and Principal Towns) have been drafted and were subject to public consultation through the Core Strategy Further Consultation (October 2011). Place Statements for rural service centres (and rural</p>

		<p>exactly makes the East Riding distinctive.</p> <p>Our Client is concerned about the final paragraph of the Vision, which seeks to ensure that development has not contributed to, and has minimised risks from the environment. Our Client notes that all planning considerations must be balanced when making decisions about new development, such that it is unreasonable to expect new development not to contribute to and minimise environmental risk. Our Client therefore objects to the wording of this part of the Vision and seeks to amend the wording to "... new development has not contributed to, and, where possible, has minimised the risk... ':</p> <p>The Major Haltemprice Settlements</p> <p>One of the ways that East Riding has sought to make the LDF more locally distinctive is to include a number of Statements for the key areas of change within the East Riding. Whilst our Client believes that this is a useful approach, it ignores the remaining smaller towns and the rural areas of the East Riding, which have their own character and distinctiveness, particularly considering the East Riding includes a significant amount of coastline. At the risk of making the Core Strategy even lengthier, our Client considers that the Core Strategy should include further Statements to address smaller towns and villages as well as the rural area.</p> <p>More specifically, our Client is generally supportive of the Statement for the Major Haltemprice Settlements, which notes that Most housing needs will have been met through a number of carefully planned and managed urban extensions..." Our Client is also generally supportive of the intention that "The important green spaces that separate the Major Haltemprice Settlements will have been largely protected..." : Our Client emphasises that there should be flexibility for development where such green spaces do not perform the function of separating the Major Haltemprice Settlements, in order to ensure that East Riding can achieve the necessary housing numbers to support the growth in population.</p> <p>Question I</p>	<p>areas) have not been prepared as they will not be a key area of change over the plan period).</p>
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			In summary, Our Client believes that the Vision for East Riding and the Statement for the Major Haltemprice Settlements can be improved. The above comments at paragraphs 4.1 to 4.4 (inclusive) represent our Clients response to Question 1 of the Core Strategy Preferred Approach.	
Mr Mike Cole, Gregory Gray Associates on behalf of Wyevale Garden Centres	Object	CSPA/1800	We consider the LDF Vision is generally appropriate for the Core Strategy and in particular support the reference to 'economically prosperous, vibrant and distinctive urban and rural communities in which everybody can enjoy a high quality of life'. The Vision could be strengthened by providing further details of the vision for the rural areas. There is little other reference to the rural areas yet several paragraphs regarding the Major Haltemprice Settlements (MHS) and Principal Towns. Whilst we do not wish to underplay the importance of the MHS and Principal Towns, we propose that a further paragraph be added to comment on the vision for the rural areas of East Riding. The Vision advises that there will be 'more limited developments in the defined rural settlements to maintain the vibrancy of rural areas.' The wording of this statement could be perceived as quite restrictive and we propose that 'limited' is replaced with 'some'.	Comments noted. The Local Plan vision has been amended to increase the emphasis on rural areas.
Mr Chris Calvert, Pegasus Planning Group on behalf of Sunderlandwick Farms	Object	CSPA/2005	The changes to the vision since the Issues and Option document are broadly welcomed, and make it more locally distinctive by making reference to the settlement hierarchy. The reference to the role of the Principal Towns in being the main focus for new development is welcomed and gives the vision local distinctiveness. We would, however, suggest the following text change to the vision, to give greater emphasis on deliver: 'Most new development will have been [replace 'focused on' with 'delivered at'] the Major Haltemprice Settlements and on at the East Riding's Principal Towns and Local Service Centres...' The inclusion of statements for the settlements which will be the main focus of development is welcomed. This makes the Core Strategy more locally distinctive and provides greater clarity of the role of each settlement in terms of planned growth and regeneration.	Comments noted. The East Riding Local Plan vision has been amended to reflect these comments.

			<p>My client support the vision for Driffield as the focus for new development in the northern area of the Wolds. My client welcomes the clear steer given in the statement as to how housing need in the Driffield area will be met, through a specific combination of previously developed land, including the redevelopment of Alamein Barracks and greenfield urban extensions. My client also acknowledges the intention to improve key natural assets in Driffield. The reference to deliverability is welcomed; however the importance of delivering appropriate levels of development across the East Riding could be highlighted.</p>	
<p>Mr Geoff Prince, Geoffrey Prince Associates Ltd on behalf of Mr & Mrs R Thornham,</p>	<p>Support with conditions</p>	<p>CSPA/2067</p>	<p>With regards to the Preferred Approach Core Strategy, we are satisfied with the broad thrust of the policies set down in the Preferred Approach Core Strategy Document, notably:</p> <ul style="list-style-type: none"> - The vision for Beverley as a market town and visitor destination. We are reassured that the distinctive character will be enhanced through a managed approach to development which protects its historic character; <p>However, we are concerned by the statement under Beverley's vision that the housing needs of the growing population of Beverley will be met through the reuse of previously developed land and through a number of key Greenfield sites in suitable locations. We are particularly concerned that pressures for development in Beverley will result in demands for higher density development within the existing settlement boundary or by adjustments to the existing settlement boundary to try to achieve maximum use of what might be regarded as previously developed land and backland to be brought forward for development. A key feature of Beverley's distinctive character is not only its historic character, but the setting of the town created by the Westwood to the west of the town. We are adamant that the existing settlement boundary to the west of Beverley represents a 'red line' which should never be crossed. On the existing Local Plan Proposals Map (Map 1) the area to the west of Beverley is shown as being An Area of Amenity or Character Importance (Policy E6 applies), an Area of High Landscape Value (Policy E10 applies) and some areas (including rear gardens to properties along</p>	<p>Comments noted.</p>

			Westwood Road) are also shown as being contained within the Beverley Conservation Area (policies E21 to E34 apply). These are areas which should be safeguarded from development in perpetuity.	
Mike Downes, Antony Aspbury Associates on behalf of Mr Adrian Sail, Strawsons Development / Omnivale Ltd	Support	CSPA/2287	We support the vision for the East Riding and in particular the statement for Driffield where my clients are major landowners. We support the revitalisation proposals for Driffield Town Centre and the encouragement of higher value economic employment growth. The Alamein Barracks site offers a great previously-developed site regeneration opportunity and with it potentially improved access and public transport linkages between the Barracks, the employment site at Kelleythorpe, The Showground , Driffield Town Centre and the Railway Station.	Support noted and welcomed.
Mr P J Gray, Hickling Gray Associates on behalf of Client Unknown,	Observations	CSPA/2106	<p>The overall vision for development of Driffield by 2026 starts from the premise that "there will have been significant opportunities for using previously developed land, including the redevelopment of the vacant Alamein Barracks site" and that a "small number of sustainably located greenfield sites will have contributed to meeting housing needs in this part of the East Riding".</p> <p>This suggests that the majority of new housing development intended for the town is targeted to the former barracks. It is in this regard where there is concern about how the housing distribution around the town will ultimately be allocated and the implications for housing development over the plan period.</p> <p>The Government's issue of an updated PPS3 "Housing" in June 2010 changes the emphasis on what is regarded as previously developed land (PDL) or brownfield land. It removes private garden land from the definition of PDL. As a result the large majority of sites shown as potential land allocations in the Preferred Approach document would now be considered to be greenfield sites.</p> <p>This change to Government policy would appear to place even greater emphasis on the development of PDL which continues to include defence buildings, such as those on the barracks site. However, it must also be recognized that PPS3 states that there is no presumption that land that is previously-developed is necessarily suitable for housing</p>	Comments noted.

			development nor that the whole of the curtilage should be developed. This suggests that much of the former barracks site would also fall outside the definition of PDL or could not be presumed to be necessarily suitable for housing. In considering the distribution of potential housing land the development of available sites in the centre of Driffield would meet the objectives for sustainability.	
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Question 2

Consultee	Nature Of Response:	Comment ID	Response	Officer Comments
Mr Michael Edgar, Development Land & Planning Consultants on behalf of Strategic Land Planning Trust	Object	CSPA/51	<p>The revised objectives are reasonable, general aspirations. The key factor will be delivering on these goals and enabling monitoring of their success. However some elements of the objectives must be REVISED.</p> <p>Objective 2 which seeks to cater for the aging population and household growth is broadly agreed with as is the improvement of meeting needs of disadvantaged communities.</p> <p>The support for regenerating Hull whilst agreed in principle cannot be translated into robust policies in this Plan while the outcome of that City's Core Strategy is incomplete (this being anticipated in 2011). There are significant concerns with regard to flood risk associated with Hull and the surrounding area which the Environment Agency has previously commented on, identifying that more than most places, Hull's future will be critically challenged by the impacts of Climate Change. The rising of sea levels and the increased frequency and intensity of rainfall events increases the chances of the city being subjected to flooding.</p> <p>The East Riding Core Strategy should be flexible enough to cope with limitations being placed on redevelopment and regenerations within Hull. In addition the work undertaken on the Hull flood risk may have limiting consequences for the Major Haltemprice Settlement's growth opportunities.</p>	Comments noted. East Riding of Yorkshire Council has worked closely with Hull City Council to ensure that the strategies for Hull and the East Riding are complementary.
Professor Ian Reid, Beswick Parish Council	Support with conditions	CSPA/82	There needs to be explicit support for educational and training attainment through Further and Higher Education and Apprenticeships development, yet this vital element of	The Local Plan will not provide the framework for development of further/higher education or apprenticeship programmes and so this

			<p>future success receives no mention. It has a place in Prosperous Economy.</p> <p>Objective 14 (renewable energy generation) is an opportunity that the East Riding needs to grasp firmly. With large tracts of sparsely populated countryside that offers little topographic complication of either airflow or incident solar radiation, East Riding should be a net exporter of energy derived from renewables.</p>	<p>cannot be included in the objectives.</p> <p>Support for objective 14 noted and welcomed.</p>
Mr Matthew Naylor, Yorkshire Water	Support	CSPA/131	Yorkshire Water supports the objectives identified for the Spatial Strategy. In particular, objectives ss1, ss14, ss16 and ss21.	Support noted and welcomed.
Mr Daniel Hatcher, Barton Willmore on behalf of Church Commissioners, Church Commissioners	Support	CSPA/140	We support the spatial objectives and believe these are the right ones to deliver the draft Spatial Vision.	Support noted and welcomed.
Ms Margaret Baddeley, Nathaniel Lichfield & Partners Ltd on behalf of Bourne Leisure Ltd, Bourne Leisure Ltd	Support with conditions	CSPA/178	Bourne Leisure supports the principle of objective 1 including that: 'increased rates of coastal erosion and more frequent flooding events are minimised and managed". However, the Company considers this objective should further refer to the management of coastal erosion and more frequent flooding as being in consultation with stakeholders and land and property owners.	Support noted and welcomed. Policy ENV6 and its supporting text provides detail on how coastal erosion and flooding will be managed and delivered.
Ms Margaret Baddeley, Nathaniel Lichfield & Partners Ltd on behalf of Bourne Leisure Ltd, Bourne Leisure Ltd	Support with conditions	CSPA/179	Bourne Leisure strongly supports Objective 13, which is to: "encourage a thriving and sustainable tourism and visitor economy, making use of town centres, seaside resorts, coastal areas and the countryside ". However, as noted in the original representation, the Company still considers that this objective should also make explicit reference to promoting high quality tourist attractions and accommodation.	Support noted and welcomed. The objective highlights the desire to encourage a thriving and sustainable tourism and visitor economy; Policy EC3 adds detail to this and includes explicit reference to how this may be supported by high quality attractions and accommodation.
Ms Margaret Baddeley, Nathaniel Lichfield & Partners Ltd on behalf of Bourne Leisure Ltd, Bourne Leisure Ltd	Support with conditions	CSPA/180	Bourne Leisure then supports Objective 16, to: "recognise the international, national and local importance of our natural environment and biodiversity, protect our high quality landscapes, identify and protect networks of green infrastructure and enhance opportunities for countryside recreation". However, the Company would stress that pursuing this objective should not preclude appropriate new development. Indeed, Bourne Leisure considers that	Comments noted.

			objectives and policies throughout the Core Strategy should recognise that there is scope for appropriate development in and adjacent to sensitive or distinctive areas, including sites of nature conservation value, provided that careful consideration is given to the detailed design and layout of any proposed development, and that commensurate mitigation measures are implemented where necessary, to minimise both direct and indirect impacts (for example, to ensure limited access and a satisfactory interface in visual terms).	
Mr Dan Mitchell, Barton Willmore on behalf of Mr Paul Butler, Barratt and David Wilson Homes	Object	CSPA/183	Therefore the 21 objectives can be improved as set out below: This objective falls under the heading of spatial strategy yet is too focused on older people and disadvantaged communities. Whilst our client appreciates that there is a particular need to ensure that such groups of people are catered for, the objective should be more general to reflect the broad objectives of the Core Strategy. Proposed Objective 2: "Cater for planned population and household growth together with the increasing proportion of older people to 2026 and promote sustainable economic progress and transformation to improve everybody's quality of life, with a particular focus on meeting the needs of disadvantaged communities (particularly in Bridlington, Goole and South East Holderness) and supporting the regeneration of the City of Hull."	Comments noted. The objects have been amended to reflect these comments.
Mrs Judith Macklin, Cottingham Parish Council	Support	CSPA/362	The objectives are vague enough that it would be difficult not to agree with them.	Comment noted.
Mrs Sarah Mustill, Pegasus Planning Group on behalf of Mr Jonathan Fry,	Observations	CSPA/306	My client considers that Objective 4, which forms part of the spatial strategy, requires some amendment. Firstly, it is not clear what the term 'smaller settlements' covers in the context of the settlement hierarchy. Does it relate to 'undefined' settlements only or encompass other types of settlements in the hierarchy? From the content of the objective it appears to be the former but this is not explicit. If the objective is intended to relate to Rural Service Centres, my client would like to add the following comments:	Comments noted. Objective 4 has been amended to reflect these comments. The objectives provide the steer for the Local Plan, to which individual policies add more detail about how they will be delivered. Consequentially, it is not considered necessary for the settlement hierarchy to be directly referenced in the objectives

			<p>The use of the word 'tranquility' is questioned, as it is such a subjective term. Whilst protecting the character of rural settlements is an appropriate objective for the LDF, the maintenance of 'tranquility' is difficult to define or measure. In the same objective the phrase 'locally justified, mainly affordable, housing needs' is contradictory. Elsewhere in the Core Strategy the council acknowledges that affordable housing need is District wide (e.g paragraph 6.4). It is not clear what local justification would be required for such development and therefore the term is ambiguous. The term 'mainly affordable' is unquantifiable and vague, seemingly allowing for market housing but without defining in what circumstances.</p> <p>This lack of clarity is compounded by the failure to define 'smaller settlements'. We would therefore suggest that objective 4 is re-worded as follows: Maintain the character of smaller settlements not identified in the hierarchy and rural areas, whilst delivering appropriate levels of development to meet housing needs, including affordable housing, encourage rural economic diversification and support existing local services.</p>	
Mrs Sarah Mustill, Pegasus Planning Group on behalf of Mr Jonathan Fry,	Object	CSPA/312	In terms of objective 15, we suggest a small amendment to reflect the differing scales of development which will be delivered and their varying ability to meet the objective: Achieve high quality design which minimizes the environmental impacts and where possible maximises the use of decentralized energy and energy efficiency during construction and throughout the development's lifetime.	Comments noted. Objective 15 has been revised to reflect these comments.
Mrs Sarah Mustill, Pegasus Planning Group on behalf of Mr Jonathan Fry,	Support	CSPA/309	My client welcomes the inclusion of the word 'deliverable' in objective 8.	Support noted and welcomed.
Mrs Sarah Mustill, Pegasus Planning Group on behalf of Mr N. Muirhead,	Support	CSPA/234	See response to CSPA/309	See officer comment to/CSPA 234
Mrs Sarah Mustill, Pegasus Planning Group on behalf of Mr N. Muirhead,	Object	CSPA/236	See response to CSPA/312	See officer comment to CSPA/312
Mrs Sarah Mustill, Pegasus Planning Group on behalf of	Object	CSPA/231	See response to CSPA/306	See officer comment to CSPA/306

Mr N. Muirhead,				
Mrs Sarah Mustill, Pegasus Planning Group on behalf of Zircon Flooring Ltd	Support	CSPA/361	See response to CSPA/309	See officer comment to/CSPA 234
Mrs Sarah Mustill, Pegasus Planning Group on behalf of Zircon Flooring Ltd	Object	CSPA/359	See response to CSPA/306	See officer comment to CSPA/306
Mrs Sarah Mustill, Pegasus Planning Group on behalf of Zircon Flooring Ltd	Support with conditions	CSPA/363	See response to CSPA/312	See officer comment to CSPA/312
Ingrid Barton,	Observations	CSPA/273	They lack detail still and now there is a serious doubt about the funding. Perhaps simpler more specific aims could be more achievable and less disappointing for the electorate.	Comments noted. The policies of the Strategy Document add detail to the objectives, and information about how they will be delivered is contained in the Delivery, Monitoring and Reviewing chapter.
Rose Freeman, The Theatres Trust	Support	CSPA/559	<p>We support Objective 3 because it recognises that having good access to cultural facilities in the form of libraries, museums and arts venues, can play a key role in underpinning education and quality of life in its broadest sense. The information and stimulation these cultural facilities supply promotes a wider understanding of the past, offers individuals the opportunity to acquire new skills and knowledge and gives everyone the opportunity to enjoy a rich and varied cultural life.</p> <p>We also support Objective 20 as this objective seeks to protect and enhance cultural and sports facilities. Culture and sport play an increasing role in addressing community cohesion. Sport brings communities together, and our arts, museums and heritage sectors are a recognised way of highlighting and celebrating cultural diversity.</p>	Support noted and welcomed.
Ian Smith, English Heritage Yorkshire Region	Support with conditions	CSPA/418	Objective 3: It is not clear why the achievement of this Objective should only be achieved in a manner which safeguards the East Riding's natural environment. Surely it should safeguard the total environment resource of the area. Suggested amendment: Amend to read:- "without harming the environmental assets of the East Riding"	Comments noted. Objective 3 amended to reflect these comments.
Mrs Sarah Mustill, Pegasus Planning Group on behalf of Mr & Mrs JH Foreman,	Support	CSPA/526	See response to CSPA/309	See officer comment to/CSPA 234

Mrs Sarah Mustill, Pegasus Planning Group on behalf of Mr & Mrs JH Foreman,	Support	CSPA/471	See response to CSPA/309	See officer comment to/CSPA 234
Mrs Sarah Mustill, Pegasus Planning Group on behalf of Mr & Mrs JH Foreman,	Object	CSPA/469	See response to CSPA/306	See officer comment to CSPA/306
Mrs Sarah Mustill, Pegasus Planning Group on behalf of Mr & Mrs JH Foreman,	Support with conditions	CSPA/473	See response to CSPA/312	See officer comment to CSPA/312
Mr Garth Hanlon, Savills on behalf of St John's College, Cambridge	Support	CSPA/570	<p>We also support the 21 objectives that the Council has put forward in order to help deliver and achieve the overarching vision for the East Riding. In particular, objectives headed 'A Prosperous Economy' incorporate a variety of means to achieve strategic growth and prosperity visions put forward for the East Riding and Goole itself. In our client's case, Objective 12 is especially relevant and aims to site employment land in locations which are accessible to the potential workforce and where best use can be made of national and regional road, rail and port related transport and infrastructure (i.e. Goole and the M62 corridor). Such an approach realises the sub-regional importance of Goole, especially its economic links to areas outside the East Riding, including adjacent sub-regions and their major urban areas (including south and west Yorkshire and the cities of Sheffield, Leeds and Hull). In allocating additional strategic employment land at established employment nodes along the Humber Ports Corridor, Objective 12 takes a positive step to ensure that existing national and multi-national firms and employers located in these areas will at least be given further opportunities to expand and prosper. By giving existing firms the potential to expand their operations, the plan will help to encourage further inward investment into these key employment corridors. In terms of Goole, such growth possibilities should also deliver additional employment opportunities for future residents within and adjacent to Goole.</p> <p>Overall, both the approach to the vision and the inclusion of realistic and informed economic objectives (which are based on evidence) comply with Policies EC1 (Using</p>	Support noted and welcomed.

			Evidence to Plan Positively) and Policy EC2 (Planning for Sustainable Economic Growth) of PPS 4 (Planning for Sustainable Economic Growth).	
Mrs Sarah Mustill, Pegasus Planning Group on behalf of Mr and Mrs Rhodes,	Support with conditions	CSPA/529	See response to CSPA/312	See officer comment to CSPA/312
Mrs Sarah Mustill, Pegasus Planning Group on behalf of Mr and Mrs Rhodes,	Object	CSPA/523	See response to CSPA/306	See officer comment to CSPA/306
Zoe Buddle, Natural England	Support with conditions	CSPA/514	<p>Natural England is encouraged to see clear reasoned objectives relating to the reduction of emissions which cause climate change. We welcome the inclusion of a separate objective relating to the use of sustainable modes of transport, including opportunities for cycling and walking.</p> <p>In relation to the 'High Quality Environment' objective we would recommend that in addition to energy efficiency during construction there are also opportunities to influence high quality environments through the provision of GI; for instance, through features such as street trees, grass verges or landscaping at the local level.</p> <p>Objective 16 outlines the importance of the natural environment, which we also support. This objective includes opportunities for countryside recreation but could be extended further by considering the opportunities for providing natural green spaces in urban areas too.</p>	Support noted and welcomed. Objectives 16 and 17 have been amended to reflect these comments.
Miss K. E. Laister, Ferriby Conservation Society	Support	CSPA/658	The vision seems appropriate and should satisfy those who asked for more detail.	Support noted and welcomed.
Mrs Sarah Mustill, Pegasus Planning Group on behalf of Evison Farmers	Object	CSPA/651	<p>Overall the broad topic areas covered by the key objectives appear appropriate and in accordance with the principles of sustainable development.</p> <p>The 5 objectives which form the spatial strategy no longer make specific reference to the settlement hierarchy, which has diluted their relevance. Some of the objectives are too difficult to measure or quantify through the use of subjective terms and vague statements.</p> <p>For example, we consider that Objective 4, which relates to the spatial strategy, requires some amendment. In the Issues and Options consultation document this objective</p>	Comments noted. Objective 4 has been amended to reflect these comments. The objectives provide the steer for the Local Plan, to which individual policies add more detail about how they will be delivered. Consequentially, it is not considered necessary for the settlement hierarchy to be directly referenced in the objectives.

			<p>was clear and concise. However, its rewording, and particularly the use of the word 'tranquility' is questioned, as it is such a subjective term. Whilst protecting the character of rural settlements is an appropriate objective for the LDF, the maintenance of 'tranquility' is difficult to define or measure.</p> <p>The phrase 'locally justified, mainly affordable, housing needs' in the context of smaller settlements is also open to interpretation. Given the diverse nature of rural settlements in the East Riding, and their number, the objective needs to be flexible enough to reflect this. The term "mainly affordable" is unquantifiable, and the phrase "locally justified" is too ambiguous.</p> <p>We would therefore suggest that objective 4 is re-worded as follows:</p> <p>"Maintain the character of smaller settlements not identified in the hierarchy and rural areas, whilst delivering appropriate levels of development to meet housing needs, including affordable housing, encourage rural economic diversification and support existing local services."</p>	
Mrs Sarah Mustill, Pegasus Planning Group on behalf of Evison Farmers	Support	CSPA/653	See response to CSPA/309	See officer comment to/CSPA 234
Mrs Sarah Mustill, Pegasus Planning Group on behalf of Evison Farmers	Support	CSPA/654	See response to CSPA/312	See officer comment to CSPA/312
Mrs Sarah Mustill, Pegasus Planning Group on behalf of Nobern Limited	Support	CSPA/675	My client supports objective 11 regarding the strengthening and growth of the local economy and objective 12 for the creation of accessible employment land in suitable locations.	Support noted and welcomed.
Mrs Sarah Mustill, Pegasus Planning Group on behalf of Mr K Warkup,	Object	CSPA/724	See response to CSPA/306	See officer comment to CSPA/306
Mrs Sarah Mustill, Pegasus Planning Group on behalf of Mr K Warkup,	Support	CSPA/725	See response to CSPA/309	See officer comment to/CSPA 234
Mrs Sarah Mustill, Pegasus Planning Group on behalf of Mr K Warkup,	Support with conditions	CSPA/726	See response to CSPA/312	See officer comment to CSPA/312

Mrs Sarah Mustill, Pegasus Planning Group on behalf of Jayne Briggs,	Object	CSPA/604	See response to CSPA/306	See officer comment to CSPA/306
Mrs Sarah Mustill, Pegasus Planning Group on behalf of Jayne Briggs,	Object	CSPA/605	See response to CSPA/309	See officer comment to/CSPA 234
Mrs Sarah Mustill, Pegasus Planning Group on behalf of Jayne Briggs,	Support with conditions	CSPA/606	See response to CSPA/312	See officer comment to CSPA/312
Mr Chris Calvert, Pegasus Planning Group on behalf of Heron Lakes (Routh) Ltd	Support	CSPA/741	My client supports objective 13 regarding the encouragement of a thriving and sustainable tourism sector.	Support noted and welcomed.
Mr Ian Owston,	Object	CSPA/666	<p>Objectives 3, 20 and 21 are not appropriate. The provision of additional housing in some Supporting Villages (eg Wilberfoss) will simply exacerbate existing road traffic problems, and runs contrary to the aims of Objective 3.</p> <p>Some supporting Villages lack basic amenities such as shops, post offices, adequate access to doctors. Even where pubs, shops and post offices exist, there is no guarantee that they will remain open forever, and there is plenty of recent evidence of rural post offices closing. So the existence of these amenities used in defining Supporting Villages on the basis of a definition which may not exist in the future, leaving housing with no supporting amenities.</p> <p>As population growth is expected to increase disproportionately in the higher age groups, the absence of these facilities locally will put greater pressure on local transport links. For example, Wilberfoss is particularly badly served by the A1079, which provides the only serious road links to York and to Pocklington. This trunk road is already over capacity with a dangerous mix of heavy goods vehicles, commuting cars, local shopping traffic, cyclists (and sometimes even pedestrians). And yet there are no plans to improve it within the Plan period- only aspirations. Reliance on public transport for shopping is unrealistic as supermarkets, which supply the needs of the majority of shoppers, are not favourably located on bus routes. In any case, older people find it difficult to carry heavy loads of</p>	Comments noted. The settlement hierarchy has been developed to promote a sustainable pattern of growth and development.

			shopping on public transport, and the days of the daily shop have, for most people, disappeared long ago. The reality is that most people will continue to use cars for shopping, and it is unrealistic to think that this will change in the foreseeable future.	
Mr Chris Calvert, Pegasus Planning Group on behalf of Mr S Goodwin and the Farnsworth Family,	Support	CSPA/632	My clients welcome the inclusion of the word 'deliverable' in objective 8 and recognition that housing land supply should be flexibility managed.	Support noted and welcomed.
Mr Chris Calvert, Pegasus Planning Group on behalf of Mr S Goodwin and the Farnsworth Family,	Support with conditions	CSPA/633	See response to CSPA/312	See officer comment to CSPA/312
Mr Chris Calvert, Pegasus Planning Group on behalf of Mr S Goodwin and the Farnsworth Family,	Support with conditions	CSPA/630	<p>Overall the broad topic areas covered by the key objectives appear appropriate and in accordance with the principles of sustainable development. There is however, no reference to the identified settlement hierarchy in the five objectives relating to the spatial strategy. Reference is made in objective 4 to smaller settlements and rural areas and in objective 2 to disadvantaged communities, but no spatial objectives reflect the vision of focusing most new development on the Major Haltemprice Settlements and Principal Towns.</p> <p>In order to ensure that the objectives reflect how the vision will be achieved we would suggest the following: Objective (Spatial Strategy): "Plan for new housing growth, meeting the needs of a growing population in accordance with the settlement hierarchy, through the identification of sufficient land to meet growth in a sustainable way. In the major Haltemprice settlements and Principal Towns this will be achieved by re-using previously developed land and a through a number of key strategic greenfield sites and a range of urban extensions."</p>	Comments noted. The objectives outline, in broad terms, what the Local Plan needs to ensure to achieve the Local Plan vision. The settlement hierarchy is defined through the policies of the Strategy Document to help ensure that development is delivered in such a way that it meets the objectives, but is not an objective in itself.
Mr Jason Tait, Planning Prospects on behalf of Horncastle Group PLC	Support with conditions	CSPA/1256	The 21 objectives of the LDF are broadly supported, however greater reference should be made to development viability. Objective 8 should refer to the need to 'ensure a deliverable, viable and flexible supply of housing land is available'.	Support noted. In accordance with National Planning Policy, the term 'deliverable' is taken to mean available, suitable and achievable and so a separate reference to viability is not considered necessary.
Mrs Sarah Mustill, Pegasus	Support	CSPA/986	See response to CSPA/309	See officer comment to/CSPA 234

Planning Group on behalf of Mr R Swales,				
Mrs Sarah Mustill, Pegasus Planning Group on behalf of Mr R Swales,	Support with conditions	CSPA/987	See response to CSPA/312	See officer comment to CSPA/312
Mrs Sarah Mustill, Pegasus Planning Group on behalf of Mr R Swales,	Object	CSPA/984	See response to CSPA/306	See officer comment to CSPA/306
Mrs Sarah Mustill, Pegasus Planning Group	Object	CSPA/837	See response to CSPA/651	See officer comment to CSPA/651
Mrs Sarah Mustill, Pegasus Planning Group	Support	CSPA/838	We welcome the inclusion of the word 'deliverable' in objective 8.	Support noted and welcomed.
Mrs Sarah Mustill, Pegasus Planning Group	Support	CSPA/839	We welcome Objective 14 regarding maximising the potential of renewable energy, whilst minimizing adverse environmental impacts and avoiding significant losses of visual amenity.	Support noted and welcomed.
Mrs Sarah Mustill, Pegasus Planning Group	Support with conditions	CSPA/841	See response to CSPA/312	See officer comment to CSPA/312
Mr John Holmes, Hull Forward	Observations	CSPA/954	Objectives for the LDF - we support the objectives but consider that 'A Prosperous Economy' should specify the relationship to Hull in terms of supporting and complementing the role, function and development of the Regional City, for example by working with Hull to ensure that a suitable portfolio of employment sites is provided across the economic area.	Comment noted. Supporting the regeneration of the City of Hull is identified in objective 2 and is a key part of the spatial strategy. As this overarches the whole plan, it is not considered necessary for this to be repeated under the prosperous economy section,
Ray Williamson, Regeneration Team, ERYC	Observations	CSPA/877	Under 3.10 " Objectives for the LDF" I wonder if we might add an additional one under " A Prosperous Economy", along the lines of " encourage and facilitate investment in areas where there has been market failure"	Comment noted. Objective 2 has been revised to refer to supporting regeneration in the East Riding.
Mr David Renwick, East Riding Of Yorkshire Council	Observations	CSPA/996	Objective 1 should also include changes to and adaption of biodiversity as a key effect resulting from climate change. There is no specific mention of adaptation to the effects of climate change in objective SSI, although it is alluded to. This is extremely important in the East Riding context given its geography and natural environment. However, adaptation is mentioned in further sections so this may simply be an issue of consistency.	Comments noted.
Mr David Renwick, East Riding Of Yorkshire	Support	CSPA/998	Objective 3 : We are pleased to see the mention of the East Riding's valued and natural environment mentioned in	Support noted and welcomed.

Council			this objective.	
Mr David Renwick, East Riding Of Yorkshire Council	Support with conditions	CSPA/999	Objective 8: We would be keen to see a caveat added to the end of this objective in the same way as for Objective 3 i.e. adding to the end “without harming the East Riding’s valued and natural environment.”	The objectives as a whole guide the plan and so repetition between individual objectives is not necessary.
Mr David Renwick, East Riding Of Yorkshire Council	Support with conditions	CSPA/1002	Objective 9: We would be keen to see a caveat added to the end of this objective in the same way as for Objective 3 i.e. adding to the end 'without harming the East Riding's valued and natural environment.'	The objectives as a whole guide the plan and so repetition between individual objectives is not necessary.
Mr David Renwick, East Riding Of Yorkshire Council	Observations	CSPA/1003	Objective 10: As well as improving the quality of the existing housing stock it would also be worth pointing out that the use of vacant properties should be encouraged, especially given the new Housing Legislation that can be used to do this. Whilst this may be outside of the planning system directly there should be a preference towards this in the first instance in areas where there is a larger amount of vacant housing. This would encourage a much more sustainable approach.	Comments noted.
Mr David Renwick, East Riding Of Yorkshire Council	Observations	CSPA/1004	Objective 13: We are pleased to see the value of the natural environment highlighted in terms of attracting visitors and investment to the area, however we need to only encourage access to biodiversity where it is appropriate and sensitive. Many nature conservation sites are in private ownership and access is restricted/prohibited and thus we would not wish to encourage public access here. In addition the wildlife that use designated sites is often sensitive to disturbance and/or damage and thus we want to manage this carefully. For example peat bogs are sensitive to damage by access by foot or vehicle and sites with bird interest like the Humber Estuary are very sensitive to disturbance. On European sites these issues need to be considered as part of the Habitats Regulations Assessment (HRA)/Appropriate Assessment (AA). There are already other sites within the East Riding that would be more appropriate in terms of promoting public access; these include Local Nature Reserves (LNRs) and National Nature Reserves (NNRs), which have been set-up with this express intention in mind.	Comments noted.
Mr David Renwick, East	Support with	CSPA/1006	Objective 15: We welcome this objective on sustainable	Comments noted. Objective 15 has been

Riding Of Yorkshire Council	conditions		design but we would suggest that the benefits of sustainable design extend beyond energy efficiency and also include potential for incorporating biodiversity enhancement, adaptation to coastal change and flooding and others.	amended to reflect these comments.
Mr David Renwick, East Riding Of Yorkshire Council	Support with conditions	CSPA/1007	Objective 16: Again we welcome this objective and we are also pleased to see the inclusion and encouragement of green infrastructure, but we would also say that habitat networks need to be picked up and the desire to conserve and enhance these in line with RSS policy ENV8 (if this is still relevant) and the Habitats Regulations. This is especially important given that climate change will mean that biodiversity will have to move and adapt to changing conditions and this cannot happen if habitats are isolated, fragmented and there are not the connections needed to facilitate movement. We should be seeking to direct biodiversity mitigation and enhancement through the planning system in order to help achieve this connectivity as appropriate to the scale of development. This should be addressed through appropriate policies for developer contributions, the core strategy biodiversity policy and biodiversity SPD. The objective starts by saying 'recognise the international, national and local importance of our natural environment', but we feel it should say 'protect' in the same way that it says protect for the other elements of this objective.	Comments noted. Objective 17 has been amended to reflect these comments.
Mr David Renwick, East Riding Of Yorkshire Council	Observations	CSPA/1008	Objective 17: This should include natural heritage alongside reference to historic heritage.	Comments noted. This has been split into 2 objectives, and the new objective 19 refers to heritage in its broadest sense.
Mr David Renwick, East Riding Of Yorkshire Council	Observations	CSPA/1009	Objective 19: We should seek to encourage the restoration of minerals sites to nature conservation usage to help achieve Objective 16.	Comments noted.
Mr David Renwick, East Riding Of Yorkshire Council	Observations	CSPA/1010	We feel that an additional objective is required to specifically cover the need to promote and manage coastal change adaptation including coastal erosion and coastal flood risk. This would include the promotion of rollback and the establishment of a coastal change management area (CCMA) based on the SMP2, the emerging Coastal Change Pathfinder and the forthcoming EA erosion mapping project.	Objective 1 is considered sufficient to address the need to manage and adapt to climate change.

Mr David Renwick, East Riding Of Yorkshire Council	Observations	CSPA/1011	It is very good to see explicit reference to climate change in objectives SSI, HBHM10, PE14 and HQE 15, 16 and 18, along with implicit ones in other objectives. Although sustainable design / construction is mentioned in HQE15, we would like to also see it mentioned in the HBHM section somewhere, perhaps in direct relation to objective 6 and the provision of new affordable housing. We would also like objective SC21 to say something like 'Ensure that new development is appropriately serviced by new or existing infrastructure, including public transport and high quality cycle access'.	Support welcomed. Objective 5 covers sustainable transport and objective 16 covers sustainable design. As the objectives as a whole guide the plan, repetition between individual objectives is not necessary.
Mr Chris Calvert, Pegasus Planning Group on behalf of Mr Peter Ward, Peter Ward Homes Ltd	Object	CSPA/1431	See officer comment to CSPA/630	See officer comment to CSPA/630
Mr Chris Calvert, Pegasus Planning Group on behalf of Mr Peter Ward, Peter Ward Homes Ltd	Support	CSPA/1432	My clients welcome the inclusion of the word 'deliverable' in objective 8 and recognition that housing land supply should be flexibility managed.	Support noted and welcomed.
Mr Chris Calvert, Pegasus Planning Group on behalf of Mr Peter Ward, Peter Ward Homes Ltd	Support with conditions	CSPA/1433	In terms of objective 15 we would suggest a small amendment to reflect the differing scales of development which will be delivered and their varying ability to meet the objective: 'Achieve high quality design which minimizes the environmental impacts and [insert 'where possible'] maximises the use of decentralized energy and energy efficiency during construction and throughout the development's lifetime.'	Comments noted. Objective 16 has been amended to reflect these comments.
Ms Maureen Bell, Bridlington & District Civic Society	Object	CSPA/1210	Yes	Support noted and welcomed.
Mr A J Williams, Advance Land and Planning Limited on behalf of Leonard Cheshire Disability (LCD)	Object	CSPA/811	'Access to good quality housing in each and every community' should added,	Objective 3 identifies that residents should have good access to high quality homes.
Mr Stephen Courcier, Carter Jonas LLP on behalf of C Carver Esq and Family,	Object	CSPA/1095	We consider that there are too many spatial objectives which affect the overall legibility of the document. Objective 4: This contains an undue emphasis on maintaining 'tranquillity' of the rural settlements. Equal	Comments noted. Objective 4 has been amended to reflect these comments. Objectives 6 - 9 look to highlight the need for the Local Plan to address housing needs in

			weight should be placed on maintaining and enhancing vibrancy in line with the overall Vision. Development should not be necessarily confined in all rural settlements to “small-scale, locally justified, mainly affordable housing needs”. The objective should also recognise that rural settlements differ very widely in function, size and sustainability, and that some play a very significant service role for large parts of the East Riding. There should be a new Strategic Objective emphasising the need to meet the housing needs of the rural areas.	both rural and urban areas.
Mr Stephen Courcier, Carter Jonas LLP on behalf of Mr Huddleston,	Observations	CSPA/1155	See response to CSPA/1095	See officer comment to CSPA/1095
Mr Geoff Prince, Geoffrey Prince Associates Ltd on behalf of Mrs Margaret Jibson,	Observations	CSPA/1186	Some of the objectives need to be reviewed as follows: Objective 2: This objective should also make reference to promoting and facilitating economic growth in areas of greatest potential - we should not necessarily focus scarce public sector resources in areas of deprivation and decline, but also focus public sector resources in areas with the greatest potential for development so as to create the tax base to improve disadvantaged areas;	Objective 2 promotes all forms of sustainable development while recognising there may be a particular need for regeneration to meet the needs of disadvantaged communities.
Mr Jason Tait, Planning Prospects on behalf of Mr P Martin,	Observations	CSPA/1137	Objective 11 should encourage the growth and modernisation of the local economy in the broadest sense of economic development as set out in the latest government guidance in PPS 4, which defines economic development as that with an economic output or such activity which generates jobs.	Comment noted.
Mrs Sarah Mustill, Pegasus Planning Group on behalf of Mr and Mrs Hudson,	Object	CSPA/1508	Overall the broad topic areas covered by the key objectives appear appropriate and in accordance with the principles of sustainable development. There is however, no reference to the identified settlement hierarchy in the five objectives relating to the spatial strategy. Reference is made in objective 4 to smaller settlements and rural areas and in objective 2 to disadvantaged communities, but no spatial objectives reflect the vision of focusing most new development on the Major Haltemprice Settlements and Principal Towns. In order to ensure that the objectives reflect how the vision will be achieved we would suggest the following:	Comments noted. The objectives outline, in broad terms, what the Local Plan needs to ensure to achieve the Local Plan vision. The settlement hierarchy is defined through the policies of the Strategy Document to help ensure that development is delivered in such a way that it meets the objectives, but is not an objective in itself.

			Objective (Spatial Strategy): Plan for new housing growth, meeting the needs of a growing population in accordance with the settlement hierarchy, through the identification of sufficient land to meet growth in a sustainable way. In the major Haltemprice settlements and Principal Towns this will be achieved by re-using previously developed land and a through a number of key strategic greenfield sites and a range of urban extensions.	
Mrs Sarah Mustill, Pegasus Planning Group on behalf of Mr and Mrs Hudson,	Support	CSPA/1509	See response to CSPA/309	See officer comment to CSPA/309
Mrs Sarah Mustill, Pegasus Planning Group on behalf of Mr and Mrs Hudson,	Object	CSPA/1510	See response to CSPA/312	See officer comment to CSPA/312,
Mark Jones, Barton Willmore on behalf of Wykeland Group Limited	Object	CSPA/1567	<p>Pages 20-22 set out the 21 objectives for the LDF. Broadly speaking, these provide a range of sensible statements which the LDF should aim to deliver. It is, however, noted that these strategic objectives are generic and could of course be applied to any local authority area. We would suggest that the Council should think carefully about these objectives and potentially seek to reduce the number of objectives and focus on local distinctiveness. For example, the Spatial Strategy objectives say nothing about the importance of the employment opportunities along the M62/A63 corridor in stimulating growth within both East Riding and the Regional City of Hull.</p> <p>The objectives and wording is also lengthy and aim to "catch all" possible eventualities. We would suggest a streamlined and shorter version, focusing on the key spatial opportunities within the East Riding. These could be amended as follows:</p> <ul style="list-style-type: none"> - Promote a prosperous East Riding as a great place to live and work; - Deliver an increase in new homes for local people, especially in the Beverley and Central Sub area; - Provide good access to jobs and key services balancing the prosperity of East Riding settlements with growth opportunities along the M62 and A63; - Promote a high quality attractive environment enhancing all aspects of the natural environment, including promoting 	It is important that a comprehensive set of objectives are defined which will deliver the Local Plan vision and provide a clear steer for the Local Plan. The objectives are based on the key spatial issues and vision for the East Riding which ensures that they are locally distinct, while further local detail is added through the individual policies and supporting text.

			<p>historic Beverley, protecting the Yorkshire Wolds and stimulating the coastal towns; and</p> <p>- Ensuring that new development is located to maximise sustainable transport opportunities promoting the special character of East Riding, maximising the development opportunities of the Haltemprice settlements.</p>	
Mr Alex Gymer,	Observations	CSPA/1290	<p>HBHM:</p> <p>a) I think affordable homes need to be emphasised.</p> <p>b) Infilling within towns and villages needs to be tighter controlled.</p>	Comments noted. Objective 6 refers to affordable housing and objective 4 to maintaining the character of smaller settlements.
Plan B Planning and Design Consultants Ltd	Support	CSPA/1410	The proposed objectives for the LDF set out in 3.10 are supported. In particular Spatial Strategy 2 which aims to cater for population and household growth and specifically the recognition that there will be an increased proportion of older people to 2026 and that their quality of life will be important.	Support noted and welcomed.
Plan B Planning and Design Consultants Ltd	Support	CSPA/1412	Similarly with regard to the proposed objectives relating to a Healthy and Balanced Housing Market the objective to provide a mix of housing by type and tenure, taking into account everyone's housing needs is welcomed.	Support noted and welcomed.
Plan B Planning and Design Consultants Ltd	Support	CSPA/1413	With regard to the objectives relating to A Prosperous Economy, that relating to growing, strengthening, modernising and diversifying the local economy and supporting emerging economic sectors.	Support noted and welcomed.
Mr Chris Calvert, Pegasus Planning Group on behalf of Land and Property Bank	Object	CSPA/1459	<p>Overall the broad topic areas covered by the key objectives appear appropriate and in accordance with the principles of sustainable development.</p> <p>The 5 objectives which form the spatial strategy no longer make specific reference to the settlement hierarchy, which has diluted their relevance. Some of the objectives are too difficult to measure or quantify through the use of subjective terms and vague statements.</p> <p>For example, we consider that Objective 4, which relates to the spatial strategy, requires some amendment. In the Issues and Options consultation document this objective was clear and concise. However, its rewording, and particularly the use of the word 'tranquility' is questioned, as it is such a subjective term. Whilst protecting the character of rural settlements is an appropriate objective</p>	Comments noted. Objective 4 has been amended to reflect these comments. The objectives provide the steer for the Local Plan, to which individual policies add more detail about how they will be delivered. Consequentially, it is not considered necessary for the settlement hierarchy to be directly referenced in the objectives.

			<p>for the LDF, the maintenance of `tranquility' is difficult to define or measure.</p> <p>The phrase `locally justified, mainly affordable, housing needs' in the context of smaller settlements is also open to interpretation. Given the diverse nature of rural settlements in the East Riding, and their number, the objective needs to be flexible enough to reflect this. The term `mainly affordable' is unquantifiable, and the phrase `locally justified' is too ambiguous.</p> <p>We would therefore suggest that objective 4 is re-worded as follows:</p> <p>"Maintain the character of smaller settlements not identified in the hierarchy and rural areas, whilst delivering appropriate levels of development to meet housing needs, including affordable housing, encourage rural economic diversification and support existing local services."</p>	
Mr Chris Calvert, Pegasus Planning Group on behalf of Land and Property Bank	Support	CSPA/1463	See response to CSPA/309	See officer comment to/CSPA 309
Mr Chris Calvert, Pegasus Planning Group on behalf of Land and Property Bank	Object	CSPA/1464	See response to CSPA/312	See officer comment to/CSPA 312
Mr Pete Sulley, Barton Willmore on behalf of Central Land Holdings,	Observations	CSPA/1621	<p>Objective 8</p> <p>Objective 8 is simply not necessary as it merely repeats National Planning Policy contained within PPS3. Further, regional targets are not ceilings and therefore the use of the phrase `to achieve regional targets' is both inappropriate and misleading. In any event, the revised Objective 7 partly deals with the original Objective 8.</p> <p>Proposed Change</p> <p>Consequently, Objective 8 should be deleted in its entirety as it is not necessary.</p>	Comments noted. Objective 8 has been amended to reflect these comments. References to meeting local housing needs, along with overall regeneration and transformation aspirations, are particularly important in the East Riding and so this is reflected in the objective.
Mr Pete Sulley, Barton Willmore on behalf of Central Land Holdings,	Object	CSPA/1713	The broad principles of the revised objectives are considered acceptable. However, there are some elements that cause concern, and these are dealt with below. If not addressed, there could be concern in achieving the respective visions outlined in the Core Strategy, Our East Riding or the Business Plan or, ultimately leading to the whole Plan being found unsound.	Comments noted. Objective 2 has been revised to reflect these comments. Reference to meeting the needs of disadvantaged communities and supporting regeneration has been retained as this will be key in improving opportunities for all.

Objective 2

The general approach of Objective 2 is acceptable but there is a concern that, in two instances, there is a particular emphasis on older people and disadvantaged communities. This objective is in relation to the Spatial Strategy of the Core Strategy, and is therefore fundamental to the focus of what the Core Strategy is trying to achieve. To do this the first line of the Vision needs to be revisited. This states that 'By 2026, the East Riding will be characterised by economically prosperous, vibrant and distinctive urban and rural communities in which everybody can enjoy a high quality of life.'

It is therefore evident that the Vision is applicable to all of the East Riding and to all residents. Whilst placing an emphasis on the older people and disadvantaged communities is to be lauded, it is inappropriate to focus the Spatial Strategy objective on any particular vulnerable groups. Further, it does not address other vulnerable groups such as young people, first time buyers (who have been identified as a particular priority as referenced in Policy HBHMI A), people with disabilities or the Gypsy and Traveller community. It is inappropriate to focus the Spatial Strategy objectives to any particular groups or areas as there are more appropriate mechanisms elsewhere within the Core Strategy to address such matters, such as the area draft statements on pages 17 - 19 for example or specific development control policies.

Therefore the objective as currently drafted is likely to lead to a false emphasis being placed on older people and disadvantaged communities, or even further emphasis on older people within disadvantaged communities, which would be to the detriment of the East Riding as a whole. As such, in relation to Question 2, whilst the principle of Objective 2 is generally appropriate, it is currently unsound and needs to be improved in order for it to be considered sound.

Proposed Change

Consequently, for Objective 2 to be considered sound it needs to be revised as follows:

'Cater for planned population and household growth

			[DELETE 'together with the increasing proportion of older people to 2026'] and promote sustainable economic progress and transformation to improve everybody's quality of life, [DELETE 'with a particular focus on meeting the needs of disadvantaged communities (particularly in Bridlington, Goole and South East Holderness) and supporting the regeneration of the City of Hull']	
Mr Pete Sulley, Barton Willmore on behalf of Central Land Holdings,	Support with conditions	CSPA/1730	<p>The general principle of Objective 3 is acceptable but there is one notable omission that needs to be included. The residents of East Riding will still need an appropriate choice of housing, both now and in the future, so that the housing market is as vibrant as possible, enabling East Riding's residents to relocate within the locality where, and when, they want. This is advocated in PPS1 as mentioned above. As such, 'homes' should be added to the list that residents have good access to. Therefore, in relation to Question 2, whilst Objective 3 is generally appropriate it is currently unsound and as such needs to be improved in order for it to be considered sound.</p> <p>Proposed Change Consequently, for Objective 3 to be considered sound it needs to be revised as follows: 'Enable residents to achieve a high quality of life with good access to jobs, homes and key services, including community and health services, shopping, education, recreation and cultural facilities, without the need for a private car and without harming the East Riding's valued and natural environment.'</p>	Comments noted. Objective 3 has been amended to reflect these comments.
Mr Jamie Pyper, Signet Planning on behalf of Southwell County Homes and Makinder	Support	CSPA/1526	It is considered that the 21 objectives identified within the LDF are appropriate and it is reassuring to note that small scale development within smaller settlements is considering appropriate and that a deliverable and flexible supply of housing land is made available. The need to protect the special character and identity of settlements as outlined in objective 17 is also important so as to ensure that development is carefully controlled to respect the form and character of the locality.	Support noted and welcomed.
Mr Pete Sulley, Barton Willmore on behalf of Trustees of the Needler	Observations	CSPA/1625	The broad principles of the revised objectives are considered acceptable. Further, and in tandem with the concerns highlighted above, the actual drafting of the	Comments noted.

Settlement,			<p>objectives that are addressed below is considered acceptable. However, given that the park and ride facility is inappropriately located, as well as being subject to funding, there is a concern that some of the objectives will not be able to be delivered, including those objections contained within 'Our East Riding' or the 'Business Plan' or, ultimately leading to the whole Plan being found unsound.</p> <p>Objective 3 Objective 3 seeks to ensure that residents have good access to jobs and key services without the need for a private car. It is evident that park and ride facilities seek to improve access to jobs and key services by providing an alternative to the private car, thereby reducing highway traffic.</p> <p>However, as previously stated, it is considered that the approved park and ride facility will not result in a significant reduction in the use of the private car as it is inappropriately located. Furthermore, there are more appropriate and more sustainable options available, as identified in the objections to the planning permission, which would have much more of a substantial impact in reducing traffic entering and exiting Beverley.</p> <p>Therefore it is not considered that the location of the park and ride facility as approved will assist in achieving Objective 3.</p> <p>Objective 5 Objective 5 seeks to ensure that new development is located so as to maximise and encourage the use of sustainable modes of transport. This is generally perceived to refer to development that attracts significant numbers of trips, such as housing, employment or retail for example. However, it is equally applicable to developments specifically for sustainable modes of transport, such as park and ride facilities. It is also interesting to note that this objective seeks to maximise the use of sustainable modes of transport.</p> <p>Consequently, given that the park and ride facility is inappropriately located, and indeed there are more appropriate and more sustainable locations, it does not meet this aspect of the object. It therefore follows that it</p>	
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			<p>does not maximise the use of sustainable modes of transport. This is absurd given that the proposal specifically entails a sustainable mode of transport.</p> <p>Therefore it is not considered that the location of the park and ride facility as approved will assist in achieving Objective 5.</p> <p>Proposed Change</p> <p>As is the case with the draft statement for Beverley, it is not considered that the wording of Objectives 3 and 5 are unsound per se, but there is concern in relation to the fact that one of the key components that is intended to help deliver these objectives, the park and ride facility, is inappropriately located.</p> <p>This is further compounded by the fact that there are more appropriate and more sustainable locations that have been identified for the park and ride facility, and that funding needs to be secured.</p>	
Mr Dan Mitchell, Barton Willmore on behalf of Stuart Evison,	Object	CSPA/1645	<p>Whilst our client supports the broad approach to the Spatial Strategy objectives set out on pages 20 to 22 of the Preferred Approach Core Strategy, we suggest that these can be improved as set out below.</p> <p>Objective 2</p> <p>This objective is too focussed on older people and disadvantaged communities. Whilst our client appreciates that there is a particular need to ensure that such groups of people are catered for, the objective should be more general to reflect the broad objectives of the Core Strategy. To align with the vision of the Core Strategy, objective 2 needs to be amended as follows:-</p> <p>Proposed Objective 2</p> <p>“Cater for planned population and household growth [TEXT STRUCK THROUGH] together with the increasing proportion of older people to 2026 [END STRIKE THROUGH] and promote sustainable economic progress and transformation to improve everybody’s quality of life, [TEXT STRUCK THROUGH] with a particular focus on meeting the needs of disadvantaged communities (particularly in Bridlington, Goole and South East Holderness) and supporting the regeneration of the City of Hull.” [END STRIKE THROUGH]</p>	Comments noted. Objective 2 has been amended to reflect these comments.

Mr Chris Taylor, Melbourne Parish Council	Support with conditions	CSPA/1535	The Parish Council support the general thrust of the proposals but wishes to express concern over the lack of definition of affordable housing and the inference that smaller communities will absorb what appears to be a disproportionate burden	Comments noted. Policy H2 provides further detail on affordable housing.
Mrs Sarah Mustill, Pegasus Planning Group on behalf of Mr A Naylor,	Object	CSPA/1666	See response to CSPA/312	See officer comment to CSPA/312
Mr Pete Sulley, Barton Willmore on behalf of The Kingswood Parks Development Company Ltd,	Object	CSPA/1686	See response to CSPA/1713	See officer comment to CSPA/1713
Mr Pete Sulley, Barton Willmore on behalf of Humber Growers/Shirethorn Ltd	Object	CSPA/1698	<p>Objective 7</p> <p>There is evidently a clear need to provide a wide range of housing. However, the objective as currently drafted is too narrow. An appropriate range of housing needs to be provided, and this should include mix, type, tenure, size and location. The 'mix' of housing is quite different to the 'range' of housing as the common perception of 'mix' is the proportion of two, three and four bed units or the proportion of detached, semidetached or flats on a site for example, whereas the 'range' is the housing stock as a whole. As such the terminology used in the objective as currently drafted could lead to confusion.</p> <p>Furthermore, and perhaps most importantly, sufficient housing needs to be provided, and at the appropriate time, so that everybody within East Riding has as much choice as possible throughout the course of the Plan period. This is particularly prevalent in areas of highest demand and the focus of the majority of development, such as Beverley. Finally, and as previously mentioned in relation to other objectives, it is inappropriate to focus on the Gypsy and Traveller Community as a specific vulnerable group as all vulnerable groups need to be catered for, including the Gypsy and Traveller Community, the elderly, young people, first time buyers and those with disabilities for example. As such, the specific reference to the Gypsy and Traveller community should be deleted.</p> <p>Therefore, in relation to Question 2, Objective 7 is</p>	<p>Comments noted. Objective 7 has been amended to reflect the comments about the definition of housing mix and vulnerable groups.</p> <p>Objective 8 focuses on the supply of housing land and so this is not repeated in objective 7.</p>

			<p>unsound as currently drafted and needs to be substantially improved in order for it to be considered sound.</p> <p>Proposed Change</p> <p>Consequently, for Objective 7 to be considered sound it needs to be revised as follows:</p> <p>'Provide a sufficient range [DELETE 'mix'] of housing by mix, size, type and tenure, in the right locations and at the appropriate time, so that [DELETE 'taking into account'] everyone's housing needs are taken into account. [DELETE 'including the specific needs of the Gypsy and Traveller community']</p>	
Mrs K. Richmond, South Cave Parish Council	Observations	CSPA/2069	<p>Obj3, We agree with the objective but the SHLAA criteria scores and more importantly their weighting needs to reflect this policy. Currently the SHLAA criteria weighting is not transparent.</p> <p>Obj4, We agree that any development should be locally justified and would support all affordable housing, Appendix A 'Explanatory notes (table 2) appears inconsistent with Objective 4 and indicates all residential in supporting villages will be affordable, whereas SS2 para 1, as currently written, reads : 1. Development wholly for affordable housing; or 2. Residential development comprising an average of 5 dwellings per annum in each Supporting Village; "or" etc, which would not bring any affordable housing as it gives the option to do either and the "or" should be changed to "and". The rationale is that supporting villages are only providing for local need and not a strategic allocation.</p> <p>Obj5, We agree with this objective and this is closely tied into obj 1. Again the SHLAA criteria and scoring need to reflect this objective.</p> <p>Obj 6, Again we agree but have concerns over how ERYCC have used an overall statistical analysis of strategic shortfall Authority wide and proportioned allocations on settlement type rather than an actual local evidential basis. If supporting villages housing provision is not strategic in nature, then it is inappropriate to allocate the strategic shortfall and this should be based on local empirical needs analysis.</p> <p>Obj 9, We agree but would need a definition of what is</p>	<p>Comments noted. The 'Managed Release of Residential Development Sites Interim Policy Guidance' was cancelled on 18 October 2011.</p> <p>The objectives in the Strategy Document have informed the policies of the Local Plan, to ensure that future development helps to realise the Local Plan Vision.</p> <p>The Settlement Network (including the approach to development in rural settlements), and the distribution of development has been revised and was subject to consultation through the Core Strategy Further Consultation (October 2011).</p>

			<p>'suitably located'. In Villages such as South Cave, building would have to take place at increased densities for perhaps the same size again if not considerably more, before it could be attractive for sustainable public transport and is therefore a contradiction of building in rural villages.</p> <p>Obj 20, We agree with the general objective however dispersed housing development does not achieve as clearly evidenced by the failure of the previous 20 years policy under the Humberside Structure plan and Beverley Borough Local Plan, and confirmed by the Planning inspector at the JSP EiP, A point ERYC would seem to agree with in it's treatment of Brough, both in the JSP and current documents, where it's inclusion as town is now focused on the employment and commercial development to support the housing that has taken place there.</p> <p>Obj 21, We agree with this objective but as with obj20, dispersed housing development does not achieve this policy objective as clearly evidenced by the failure of the previous 20 years policy under the Humberside Structure Plan and Beverley Borough Local Plan, and confirmed by the Planning Inspector at the JSP EiP, A point RYC would seem to agree with in it's treatment of Brough, both in the JSP and current documents, where it's inclusion as a town is now focused on the employment and commercial development to support the housing that has taken place there.</p>	
Ian Smith, English Heritage Yorkshire Region	Support with conditions	CSPA/1967	Objective 9: We support this Objective especially that part which relates to encouraging densities which reflect local circumstances. This reflects the advice in PPS3.	Support noted and welcomed.
Ian Smith, English Heritage Yorkshire Region	Support with conditions	CSPA/1968	Objective 13: We support this Objective to create a thriving and sustainable tourist and visitor economy, especially that element which relates to making the most of the area's heritage assets.	Support noted and welcomed.
Ian Smith, English Heritage Yorkshire Region	Support with conditions	CSPA/1969	Objective 15: Whilst we broadly support the thrust of this Objective, it ought to, also, make reference to the important role which the reuse of existing buildings can make to reducing energy demands in the Plan area. Over 90 per cent of non-energy minerals extracted in Great Britain are used to supply the construction industry yet, each year, some 70 million tonnes of construction and	Comments noted. Objective 16 has been amended to reflect these comments.

			<p>demolition materials and soil end up as waste. This accounts for 24 per cent of the total waste generated by the UK. Therefore in order to reduce waste, emphasis should be placed on the inherent sustainability of managing and reusing existing buildings, areas and sites, retrofitting and adapting where necessary to meet modern energy requirements. Research by the Building Research Establishment estimated that the energy inherent in materials and construction show that a typical Victorian house contains energy equivalent to 15,000 litres of petrol. Demolition and construction of new buildings therefore demands a considerable investment of energy taking account of the energy embedded within the building, the energy required for demolition and the energy required for construction of a new building. Any new buildings therefore have to be many times more energy-efficient than the old to make the equation balance over a reasonably short pay-back period. Suggested amendment: Amend Objective 15 to read: "Achieve high-quality design which minimises the environmental impacts, prioritises the reuse and adaptation of existing buildings, maximises the use of the use of decentralised energy...etc"</p>	
Mr Pete Sulley, Barton Willmore on behalf of Central Land Holdings,	Object	CSPA/1735	<p>The general principle of Objective 4 is acceptable but there is concern about the use of the term 'small-scale'. 'Small-scale' is not defined anywhere and can lead to ambiguity in many situations. Further, a 'larger' development, although not necessarily 'small scale', could still be appropriate in smaller settlements or rural areas, depending on the particular characteristics of the site and settlement, such as a brownfield windfall site, or the particular needs at that time, such as a shortfall in housing that needs to be met. It also may not be sustainable to not develop appropriate sites in smaller settlements on the simple premise that they are not 'small-scale'. Sustainability is multi-faceted and not redeveloping a site might be the least sustainable option. If there is an express need for housing, it would not be sustainable for that express need to continue, or even exacerbated, because a prospective site is not 'small-scale'. Alternatively, if a scheme can improve the sustainability of a</p>	Comments noted. Objective 4 has been amended to reflect these comments.

			<p>particular situation, but to achieve that objective the development would need to be larger than 'small-scale' because of the characteristics of the site or the role and function of the settlement, it could be unsustainable to not develop the site.</p> <p>Further, there is a need for open market as well as affordable housing within these smaller settlements and rural areas and as such there should not be a particular distinction between open market and affordable housing in this Spatial Strategy objective; there are appropriate mechanisms elsewhere in the LDF to address these matters, most notably through development control policies.</p> <p>Moreover, and as clearly stated in Policy HBHM2, the supporting evidence base for affordable housing has not yet been completed therefore it is wholly inappropriate to assume that housing requirements in smaller settlements and rural areas should be 'mostly affordable'.</p> <p>Therefore the objective needs to be revised to be more flexible so that development other than 'small-scale' development can be accommodated provided it is still appropriate for the site and settlement. In addition, it should be revised so that it does not specifically promote affordable housing at the expense of much needed open market housing. As such, in relation to Question 2, Objective 4 is currently unsound and needs to be improved in order for it to be considered sound.</p> <p>Proposed Change</p> <p>Consequently, for Objective 4 to be considered sound it needs to be revised as follows:</p> <p>'Maintain the characteristic tranquillity of smaller settlements and rural areas, consider development that is commensurate to the role, function and characteristics of the site and settlement to respond to housing needs and realise opportunities for appropriate rural economic diversification.'</p>	
Mr Pete Sulley, Barton Willmore on behalf of Central Land Holdings,	Support with conditions	CSPA/1740	See response to CSPA/1698	See officer comment to CSPA/1698
Mr Pete Sulley, Barton	Object	CSPA/1744	See response to CSPA/1621	See officer comment to CSPA/1621

Willmore on behalf of Central Land Holdings,				
Mr Pete Sulley, Barton Willmore on behalf of Central Land Holdings,	Object	CSPA/1745	<p>Seeking to achieve high quality design for the benefit of the environment is an objective that is to be applauded. However, seeking to minimise environmental impacts and maximise the use of decentralised energy and energy efficiency is too absolute. Minimised environmental impacts and maximised energy efficiency may not always be the most sustainable option taking all things into consideration. Further, the financial implications of minimising environmental impacts and maximising energy efficiency, together with other requirements such as affordable housing provision and Section 106 payments, could lead to developments becoming financially unviable. As such, in relation to Question 2, Objective 15 is generally appropriate but needs to be improved in order for it to be considered sound.</p> <p>Proposed Change</p> <p>Consequently, for Objective 15 to be considered sound it needs to be revised as follows: 'Achieve high quality design which considers the reduction of the environmental impacts and increases in the use of decentralised energy and energy efficiency during construction and throughout the development's lifetime.'</p>	Comments noted. Objective 16 has been amended to reflect these comments.
Mr Neil Manock, Neil Manock on behalf of Lady Miller,	Object	CSPA/1729	<p>The proposed objectives for the LDF give insufficient weight to the need to provide an adequate and available supply of land for housing, in accordance with the requirements of advice in PPS3.</p> <p>Proposed amendment;</p> <p>Include reference to the need to ensure an adequate available supply of land for housing in accordance with national planning guidance.</p>	Objective 8 includes a reference to ensuring a deliverable and flexible supply of housing land is available.
Mr Dan Mitchell, Barton Willmore on behalf of Mr Paul Butler, Barratt and David Wilson Homes	Object	CSPA/1845	<p>Whilst our client supports the majority of revised objectives set out on pages 20 to 22 of the Preferred Approach Core Strategy, there is concern over a number of the objectives. Therefore the 21 objectives can be improved as set out below:</p> <p>Objective 2: This objective falls under the heading of Spatial Strategy yet is too focussed on older people and disadvantaged communities. Whilst our client appreciates</p>	Comments noted. Objective 2 has been amended to reflect these comments.

			that there is a particular need to ensure that such groups of people are catered for, the objective should be more general to reflect the broad objectives of the Core Strategy. To align with the vision of the Core Strategy, objective 2 needs to be amended as follows: [Delete "...together with the increasing proportion of older people to 2026..." and "...with a particular focus on meeting the needs of disadvantaged communities (particularly in Bridlington, Goole and South East Holderness) and supporting the regeneration of the City of Hull."]	
Mr Dan Mitchell, Barton Willmore on behalf of Mr Paul Butler, Barratt and David Wilson Homes	Object	CSPA/1846	Objective 6: Our client objects to the currently drafted wording of objective 6. The provision of affordable housing should be based on identified need and therefore throughout the plan period it may not be necessary to 'significantly increase' such provision. We therefore recommend that objective 6 is re-drafted as follows: [Replace "Significantly increase the provision of..." with "Provide sufficient..." and replace "...in accordance with..." with "...to meet..."].	The East Riding Strategic Housing Market Assessment identifies a significant need for affordable housing in the East Riding; the delivery of affordable housing would need to significantly increase throughout the plan period if this need was to be met.
Mr Dan Mitchell, Barton Willmore on behalf of Mr Paul Butler, Barratt and David Wilson Homes	Object	CSPA/1847	Objective 7: Our client supports the approach identified within Objective 7 as it identifies a flexible and responsive approach to the supply of future housing in terms of mix, type and densities. However, in order to ensure that the objective is consistent with the guidance set out within the RSS, it is considered that since the policy specifically refers to the needs of 'everyone' it is not then necessary to refer specifically to the needs of 'the Gypsy and Traveller community' as well. Our client therefore recommends that objective 7 is re-drafted as follows: [Delete "...including the specific needs of the Gypsy and Traveller community"].	Gypsy and Traveller Communities, and older people, are identified in the Local Plan evidence base as having specific housing needs which the plan should take into account.
Mr Dan Mitchell, Barton Willmore on behalf of Mr Paul Butler, Barratt and David Wilson Homes	Object	CSPA/1848	Object 8: This objective incorrectly makes reference to regional targets in terms of housing. Annual housing targets in the RSS are not ceilings and therefore should be deleted. It is also noted by our client that objective 8 merely repeats guidance contained within PPS3, therefore policy 8 should be deleted.	Comments noted. Objective 8 has been amended to reflect these comments; as it references the need to meet regeneration and transformation requirements it is not considered that it merely repeats national guidance.
Mr Dan Mitchell, Barton Willmore on behalf of Mr Paul Butler, Barratt and	Object	CSPA/1849	Our client broadly supports objective 20 although would suggest that this is re-worded given that some existing facilities within East Riding may need to be relocated in	Comments noted. Objective 20 has been amended to reflect these comments.

David Wilson Homes			order to enhance their role as a local service. We would therefore suggest that objective 20 is re-drafted as follows: "Support the vitality of settlements by seeking to protect and / or enhance necessary and viable community facilities and services, including education, health care, recreation, cultural and sports facilities.	
Mr Dan Mitchell, Barton Willmore on behalf of Mr Paul Butler, Barratt and David Wilson Homes	Object	CSPA/1850	Our client is of the view that the Core Strategy should include an additional objective identifying that the Main Haltemprice Settlements, Principal Towns and Local Service Centres will be the main focus for future development within the East Riding. As such, we consider that the following objective should be included within the Core Strategy: "Ensure that future development is located in highly sustainable locations by focussing the majority of new development in the Main Haltemprice Settlements, Principal Towns and the Local Service Centres, so as to enable people to access."	An additional objective is not considered necessary; the objectives provide a steer for the Local Plan and identifies the need to promote sustainable development that is located to maximise use of sustainable forms of transport, while individual policies of the Strategy Document add the necessary detail about how they may be fulfilled (i.e. through the spatial strategy).
Nathan Smith, Barton Willmore on behalf of Galliford Try (Strategic) Land, Galliford Try (Strategic) Land	Object	CSPA/1598	Objective 3 Objection Galliford believes that residents of the East Riding will need an appropriate choice of housing from the existing housing stock and also in the future, to enable people having sufficient choice to meet their needs. We therefore believe that 'homes' should be added to the list that residents have good access to. We note reference in Objective 3 "without the need for a private car and without harming the East Riding's valued and natural environment". Paragraph 2 of PPG13, sets out that planning can help to reduce the need to travel, reduce the length of journeys and make it safer and easier for people to access jobs, shopping, leisure facilities and services by public transport, walking, and cycling. This is supplemented in paragraph 4, which includes three Objectives including to reduce (our emphasis) the need to travel, especially by car. Therefore Objective 3 as drafted is contrary to PPG13, as inevitably there will be a need for the private car. The emphasis should seek to reduce the need to travel, especially by private car by locating development in sustainable locations, such as Beverley, which could then	Comments noted. Objective 3 has been amended to reflect these comments.

			<p>promote other forms of travel including public transport, walking and cycling.</p> <p>With regards to “without harm the East Riding’s valued and natural environment” it is not clear what specific areas, the spatial strategy refers, and whether this is only national designations such as SSSI or also applies to regional and local designations. Galliford would be concerned to this overall ‘blanket’ approach in the overall spatial strategy, where in some instances there is a need for flexibility.</p> <p>We believe that the overall objectives for protecting the East Riding’s natural environment are sufficiently set out in Objective 6 on page 21. Therefore there is no need to include this issue in Objective 3.</p> <p>Proposed Changes</p> <p>We would therefore recommend that Objective 3 is amended as follows to make it sound:</p> <p>“Enable residents to achieve a high quality of life with good access to jobs, homes and key services, including community and health services, shopping, education, recreation and cultural facilities, whilst seeking to reduce the need for a private car”.</p>	
Nathan Smith, Barton Willmore on behalf of Galliford Try (Strategic) Land, Galliford Try (Strategic) Land	Object	CSPA/1599	<p>Objective 6 Objection</p> <p>Objective 6 sets out the aim to ‘significantly increase the provision of affordable housing’. It is not clear therefore whether this means there may be an increase in the overall proportion of the current 40% of affordable housing having to be delivered by developers on site, therefore concurrently the amount of open market housing delivered reduces.</p> <p>If this is the case then our client strongly objects to this objective, as ultimately there is a cost implication on such a strategy being successful, if assuming the Council are relying only developers delivering affordable housing.</p> <p>Objective 6 does not recognise the economic viability for developers to deliver affordable housing, and as such there is a need to recognise this.</p> <p>Proposed Change</p> <p>We therefore recommend that HBHM6 is amended as follows:</p>	Objective 6 identifies a need to increase provision of affordable housing; policy H2 and its supporting text provides the details about how this will be achieved (including the affordable housing thresholds and requirements, and how viability will be considered).

			“Increase the provision of affordable housing throughout the East Riding where viable in accordance with the most up-to-date assessment of identified needs.”	
Nathan Smith, Barton Willmore on behalf of Galliford Try (Strategic) Land, Galliford Try (Strategic) Land	Object	CSPA/1600	<p>Objective 8 Objection</p> <p>Whilst our client is generally supportive of Objective 8, which seeks to ensure a deliverable and flexible supply of housing land, our client objects to the terminology within this objective.</p> <p>The first being that objective 8 does not recognise the need for a flexible and rolling 5 year supply of deliverable housing sites as set out in paragraph 60 of PPS3 (June 2010), which should be a key objective for the Core Strategy.</p> <p>As noted above in our response to the East Riding LDF Vision, PPS3 seeks to “deliver” much needed family housing. Objective 8 also appears to be treating “regional targets” as ceilings when it implies ‘which is managed to achieve regional targets’. Policy H2, part 5 of the adopted RSS, which still forms part of the statutory development plan clearly states that’s housing figures should not be treated as ceilings.</p> <p>Therefore it appears the Council is already planning to under provide, when clearly there is a need to ensure that development delivered meets identified needs. In this regard our client considers there should be a stronger emphasis on seeking, where appropriate to exceed regional targets.</p> <p>Proposed Change</p> <p>Taking into consideration the above we would recommend that HBHM is changed to read:</p> <p>“Ensure a flexible five year supply of deliverable land is available, which is managed and where appropriate exceeds regional targets and overall regeneration and transformation aspirations.”</p>	Objective 8 has been amended to remove the reference to regional targets. A reference to the 5 year supply is not necessary as this is dictated by national planning policy.
Nathan Smith, Barton Willmore on behalf of Galliford Try (Strategic) Land, Galliford Try (Strategic) Land	Object	CSPA/1601	<p>Objective 9 Objection</p> <p>Our client generally supports the emphasis on developing land at densities which reflect local circumstances. However our client objects to the phrase ‘managing the</p>	Comments noted. Objective 9 has been amended to reflect these comments.

			<p>release of suitably located Greenfield sites to maximise the use of the East Riding's limited supply of Previously Developed Land' (PDL).</p> <p>This objective implies that until all of the East Riding's PDL has been exhausted the Council will seek to restrict Greenfield sites from being brought forward for development. In reality there will be a need for both Greenfield and brownfield sites to be brought forward in parallel. In some instances where there are potential delays on brownfield sites from being brought forward, then the appropriate strategy is to bring forward those suitable and deliverable Greenfield sites.</p> <p>PPS3 sets out that whilst there is a presumption in favour of brownfield sites, it does also state that there is a need to maintain a flexible and responsive supply of land. The Council themselves recognise that it has a limited supply of PDL and therefore to ensure that the objectives of PPS3 are adhered to, there is a need to ensure that a flexible supply of land, including both brownfield and Greenfield can be brought forward in parallel. By bringing forward concurrently reduces the potential that annual housing targets will not be met.</p> <p>Proposed Change</p> <p>Taking into consideration the above points and to make objective 9 sound, we it is reworded to read:</p> <p>“Encourage the efficient use of land by developing at densities which reflect local circumstances and managing the release of suitably located sites to ensure a flexible five year supply of deliverable land, whilst seeking to maximise the use of the East Riding's limited supply of Previously Developed Land”</p>	
<p>Nathan Smith, Barton Willmore on behalf of Galliford Try (Strategic) Land, Galliford Try (Strategic) Land</p>	<p>Object</p>	<p>CSPA/1602</p>	<p>Objective 15 Objection</p> <p>Whilst our client supports the objective to achieve high quality design, there is a need to recognise flexibility. Our client is concerned with the terminology of 'minimises' the environmental impacts and 'maximises' the use of decentralised energy. Galliford believes this to be too absolute and there is no measure against how such an objective can be assessed against. There is also a need to</p>	<p>Comments noted. Objective 16 has been amended to reflect these comments.</p>

			<p>consider the financial implications of seeking to meet such objectives, when with any development proposal there will be other S106 obligations required.</p> <p>Proposed Change</p> <p>Therefore to make this part of the plan sound, we recommend that Objective 21 is amended as follows: “Achieve high quality design which considers the reduction of the environmental impacts and where possible increases the use of decentralised energy and energy efficiency during construction and throughout the development’s lifetime”</p>	
Mr Pete Sulley, Barton Willmore on behalf of David Watts,	Object	CSPA/1784	See response to CSPA/1713	See officer comment to CSPA/1713
Mr John Brown, East Riding of Yorkshire Rural Partnership	Object	CSPA/1903	The Partnership would like the statement in Spatial Strategy objective 2 to be strengthened by adding to the bracketed list of Bridlington, Goole, South-East Holderness the words: “and hidden pockets of dispersed rural disadvantage”	Comments noted. Objective 2 has been amended to reflect these comments.
Ian Smith, English Heritage Yorkshire Region	Support with conditions	CSPA/1970	Objective 17: The East Riding of Yorkshire has the second largest number of designated assets in the Region. It has more Conservation Areas than any other authority, the second highest total of Listed Buildings, the second-highest number of Scheduled Monuments. The area has more high-Grade Listed Buildings than anywhere else in Yorkshire and the Humber. These assets (and the many other non-designated areas) make a considerable contribution to the distinctive character of the Core Strategy area, to the quality of life of its communities and to the area’s economic well-being. However, as has been pointed out above, they face numerous challenges over the plan period. Given the importance of the historic environment to the Plan area, we consider that it needs to have a separate Objective. moreover, in view of the fact that the majority of the heritage assets of the East Riding are located outside its towns and villages, it appears slightly nonsensical to have an Objective which only refers to the heritage within settlements. Finally, the historic environment is only one element which helps give the settlements their distinctive character. An objective which deals with local distinctiveness needs also to embrace other aspects (such	Comments noted. Objective 18 has been amended and a new objective 19 has been added to reflect these comments.

			as amenity areas, landscape setting, biodiversity etc). Suggested amendment: (a) Amend Objective 17 to read:- “Value the special character of our settlements by ensuring that development safeguards and reinforces those elements that contribute to their distinct identity, avoids coalescence and protects their landscape setting” (b) Insert an additional Objective under a High Quality Environment to read:- “Recognise the international, national and local importance of our heritage assets and maximise their potential in contributing to the delivery of the economic well-being of the area and to the quality of life of its communities”.	
Mr Dave Evans, Humber Archaeology Partnership	Support	CSPA/2241	Objective 9 - We support this Objective especially that part which relates to encouraging densities which reflect local circumstances. This reflects the advice in PPS3.	Support noted and welcomed.
Mr Dave Evans, Humber Archaeology Partnership	Support	CSPA/2242	Objective 13 - We support this Objective to create a thriving and sustainable tourist and visitor economy, especially that element which relates to making the most of the area’s heritage assets.	Support noted and welcomed.
Mr Dave Evans, Humber Archaeology Partnership	Support with conditions	CSPA/2243	Objective 15 - Whilst we broadly support the thrust of this Objective, it ought to, also, make reference to the important role which the reuse of existing buildings can make to reducing energy demands in the Plan area.	Comments noted. Objective 16 has been amended to reflect these comments.
Mr Dave Evans, Humber Archaeology Partnership	Observations	CSPA/2244	Objective 17 - The East Riding of Yorkshire has the second largest number of designated heritage assets in the Region. It has more Conservation Areas than any other authority, the second highest total of Listed Buildings, and the second-highest number of Scheduled Monuments. The area has more high-Grade Listed Buildings than anywhere else in Yorkshire and the Humber. These assets (and the many other non-designated assets and archaeological landscapes) make a considerable contribution to the distinctive character of the Core Strategy area, to the quality of life of its communities and to the area’s economic well-being. However, as has been pointed out above, they face numerous challenges over the plan period. Given the importance of the historic environment to the Plan area, we consider that it needs to have a separate Objective.	Comments noted. Objective 18 has been amended, and a new objective 19 has been added, to reflect these comments.

			<p>Moreover, in view of the fact that the majority of the heritage assets of the East Riding are located outside its towns and villages, it appears slightly nonsensical to have an Objective which only refers to the heritage within settlements.</p> <p>Finally, the historic environment is only one element which helps give the settlements their distinctive character. An objective which deals with local distinctiveness needs also to embrace other aspects (such as amenity areas, landscape setting, biodiversity etc).</p>	
Mr Jason Tait, Planning Prospects on behalf of Horncastle Group PLC	Support with conditions	CSPA/1962	Objective 11 should encourage the growth and modernisation of the local economy in the broadest sense of economic development as set out in the latest government guidance in PPS 4, which defines economic development as that with an economic output or such activity which generates jobs.	Comments noted.
Mr Pete Sulley, Barton Willmore on behalf of Central Land Holdings,	Observations	CSPA/1950	See response to CSPA/1730	See officer comment to CSPA/1730
Mr Pete Sulley, Barton Willmore on behalf of Central Land Holdings,	Observations	CSPA/1951	See response to CSPA/1735	See officer comment to CSPA/1735
Mr Pete Sulley, Barton Willmore on behalf of Central Land Holdings,	Observations	CSPA/1952	See response to CSPA/1698	See officer comment to CSPA/1698
Mr Pete Sulley, Barton Willmore on behalf of Central Land Holdings,	Object	CSPA/1953	See response to CSPA/1745	See officer comment to CSPA/1745
Mr Pete Sulley, Barton Willmore on behalf of Central Land Holdings,	Object	CSPA/1954	See response to CSPA/1713	See officer comment to CSPA/1713
Mr Pete Sulley, Barton Willmore on behalf of Central Land Holdings,	Object	CSPA/1955	See response to CSPA/1730	See officer comment to CSPA/1730
Mr Pete Sulley, Barton Willmore on behalf of Central Land Holdings,	Object	CSPA/1956	See response to CSPA/1735	See officer comment to CSPA/1735
Mr Pete Sulley, Barton Willmore on behalf of	Object	CSPA/1957	See response to CSPA/1698	See officer comment to CSPA/1698

Central Land Holdings, Mr Pete Sulley, Barton Willmore on behalf of Central Land Holdings,	Object	CSPA/1958	See response to CSPA/1621	See officer comment to CSPA/1621
Nathan Smith, Barton Willmore on behalf of Kayterm Plc	Support with conditions	CSPA/1753	<p>The Core Strategy sets out 21 Objectives, which are intended to help deliver the Vision for the LDF. Our Client generally supports the division of the objectives into themes and believes that this enhances the clarity of the document.</p> <p>Objective 3 Objective 3 concerns enabling "residents to achieve a high quality of life", Our Client considers that good access to homes is as important as good access to jobs and key services and therefore seeks to include reference to this within the first clause of the Objective.</p> <p>Our Client notes that there is reference in Objective 3 to enable access to jobs and key services i - (also homes as per our comments in paragraph 4.8 above), "... without the need for a private car..." Our Client considers that this approach is not consistent with national policy, which seeks to "... reduce the need to travel, especially by car" (PPG13, paragraph 4). On this basis, our Client objects to Objective 3, as it is not consistent with national policy and cannot therefore be considered to be 'sound' under the provisions of paragraph 4.52 of PPS12. Our Client therefore recommends that this Objective is reworded to reflect this different emphasis by replacing the word 'without' with 'reducing'.</p>	Comments noted. Objective 3 has been amended to reflect these comments.
Mr Dan Mitchell, Barton Willmore on behalf of Stuart Evison,	Object	CSPA/1946	See response to CSPA/1846	See officer comment to CSPA/1846
Mr Dan Mitchell, Barton Willmore on behalf of Stuart Evison,	Object	CSPA/1947	See response to CSPA/1847	See response to CSPA/1847
Mr Dan Mitchell, Barton Willmore on behalf of Stuart Evison,	Object	CSPA/1948	<p>Our client is of the view that the Core Strategy should include an additional objective as follows: Proposed New Objective "Ensure that future development is located in highly sustainable locations by focusing the majority of new</p>	An additional objective is not considered necessary; the objectives provide a steer for the Local Plan and identifies the need to promote sustainable development that is located to maximise use of sustainable forms

			development in the parts of East Riding that comprise the Regional City of Hull (in particular the Major Haltemprice Settlements), Principal Towns and the Local Service Centres”	of transport, while individual policies of the Strategy Document add the necessary detail about how they may be fulfilled (i.e. through the spatial strategy).
Mr Alex Gymer,	Observations	CSPA/1961	17 Greater emphasis on protecting the Wolds environment.	Objectives 17 and 18 highlight the importance of all of the East Riding’s high quality landscapes.
Mr Michael Edgar, Development Land & Planning Consultants on behalf of Strategic Land Planning Trust	Object	CSPA/1971	Objective 6 to “significantly increase the provision of affordable housing throughout the East Riding in accordance with the most up-to-date assessment of identified needs.” Viability of development in the current housing market is often tenuous. The delivery of new homes needs to be supported as part of the economic recovery. The desire for additional affordable housing should not threaten or undermine that objective. With this in mind the opportunity for alternative means of affordable housing delivery should be encouraged for example rural exception sites.	Comments noted.
Mr Michael Edgar, Development Land & Planning Consultants on behalf of Strategic Land Planning Trust	Object	CSPA/1972	Objective 8 of the 21 objectives refers to the Strategy seeking to “Ensure a deliverable and flexible supply of housing land is available, which is managed to achieve regional targets and overall regeneration and transformation aspirations”. This will need to be amended to remove reference to regional targets following the announcement of the 6th July 2010 by the SoS that the RSS’s were to be revoked under s79(6) of the Local Democracy Economic Development and Construction Act 2009. In order for the Core Strategy to be justified and robust, housing targets will need to be democratically agreed and evidenced at a local level. Given the discussions at the Agents forum associated with the Core Strategy the starting point for the local level provision would be the most recent CLG housing projection. Those figures suggest an additional 2,500 households per annum will need to be accommodated in the East Riding over the plan period.	Comments noted. Objective 8 has been amended to reflect these comments.
Mr Dan Mitchell, Barton Willmore on behalf of Mr Paul Butler, Barratt and	Object	CSPA/1919	See response to CSPA/1846.	See officer comment to CSPA/1846

David Wilson Homes				
Mr Dan Mitchell, Barton Willmore on behalf of Mr Paul Butler, Barratt and David Wilson Homes	Object	CSPA/1920	See response to CSPA/1847	See officer comment to CSPA/1847.
Mr Dan Mitchell, Barton Willmore on behalf of Mr Paul Butler, Barratt and David Wilson Homes	Object	CSPA/1921	See response to CSPA/1848	See officer comment to CSPA/1848
Mr Dan Mitchell, Barton Willmore on behalf of Mr Paul Butler, Barratt and David Wilson Homes	Object	CSPA/1922	See response to CSPA/1849	See officer comment to CSPA/1849
Mr Dan Mitchell, Barton Willmore on behalf of Mr Paul Butler, Barratt and David Wilson Homes	Object	CSPA/1923	Therefore the 21 objectives can be improved as set out below: Proposed New Objective “Ensure that future development is located in highly sustainable locations by focussing the majority of new development in the main Haltemprice Settlements, Principal Towns and the Local Services Centres, so as to enable people to access.”	An additional objective is not considered necessary; the objectives provide a steer for the Local Plan and identify the need to promote sustainable development that is located to maximise use of sustainable forms of transport. Individual policies of the Strategy Document add the necessary detail about how this will be achieved (i.e. through the spatial strategy).
Mrs Sarah Mustill, Pegasus Planning Group on behalf of Mr A Naylor,	Support	CSPA/1943	See response to CSPA/309	See officer comment to CSPA/309
Mrs Sarah Mustill, Pegasus Planning Group on behalf of Mr A Naylor,	Object	CSPA/1944	See response to CSPA/306	See officer comment to CSPA/306
Mr Geoff Prince, Geoffrey Prince Associates Ltd on behalf of Mrs Margaret Jibson,	Observations	CSPA/1964	Objective 8: This objective needs redrafting now that it is no longer a requirement to meet regional targets;	Comment noted. Objective 8 has been amended to reflect these comments.
Mr Geoff Prince, Geoffrey Prince Associates Ltd on behalf of Mrs Margaret Jibson,	Observations	CSPA/1965	Objective 9: There is no need to manage the release of Greenfield land - the market and planning processes for bringing forward such sites effectively provide their own in built mechanisms for enabling Greenfield land to come forward in a phased way once allocated.	It is considered necessary for the release of Greenfield land to be managed to help maximise the use of brownfield land.
Mr Geoff Prince, Geoffrey Prince Associates Ltd on	Observations	CSPA/1966	An additional objective should recognise the importance of the LSCs in delivering services to their rural hinterland and	The objectives set out guiding principles which drive the Local Plan and objective 3 identifies

behalf of Mrs Margaret Jibson,			being foci for new jobs, housing and services.	the importance of good access to jobs, housing and services. This provides a steer for the settlement hierarchy and the identification of some settlements as local service centres; however it is not considered necessary for this to be set out in the objectives.
Mr Mike Cole, Gregory Gray Associates on behalf of Wyevale Garden Centres	Support	CSPA/1801	The objectives outlined in Paragraph 3.10 of the Preferred Approach Core Strategy appear to provide relevant guiding principles for development and as such they are supported. We consider it is imperative that the deliverability of housing is a key objective for the Core Strategy to achieve. Objective 8 refers to the required deliverability and flexibility of housing supply and this objective is welcomed. Objective 9, which recognises the lack of brownfield sites and need for greenfield sites to be developed, is also strongly supported.	Support noted and welcomed.
Mr John Brown, East Riding of Yorkshire Rural Partnership	Object	CSPA/1906	Objective 11 in the draft LDF could be strengthened by the addition of the following sentence to complete the paragraph "Reinforce the linkage between the economic prosperity of farming to the sustainable management of landscapes and catchments that supply wider ecosystem services"	Objective 11 refers to the economy in its entirety (including agriculture). The suggested changes are too detailed for the objective.
Mr Chris Calvert, Pegasus Planning Group on behalf of Sunderlandwick Farms	Object	CSPA/2006	See response to CSPA/630	See response to CSPA/630
Mr Chris Calvert, Pegasus Planning Group on behalf of Sunderlandwick Farms	Support	CSPA/2007	My clients welcome the inclusion of the word 'deliverable' in objective 8 and the recognition that housing land supply should be flexibility managed.	Support noted and welcomed.
Mr Chris Calvert, Pegasus Planning Group on behalf of Sunderlandwick Farms	Object	CSPA/2008	See response to CSPA/1433	See officer comment to CSPA/1433
Mr Pete Sulley, Barton Willmore on behalf of Central Land Holdings,	Object	CSPA/1959	Objective 11 As previously mentioned in relation to earlier objectives, it is inappropriate to specifically refer to particular groups, Objective 11 specifically refers to town centres and such an emphasis could therefore be to the detriment of the rural economy or, in this instance, Goole, which is a town in need of regeneration. As such, the specific reference to town centres should be deleted.	Comments noted. While objective 11 refers specifically to the East Riding's town centre, this is within the context of growing, strengthening, modernising and diversifying the economy more generally. It is therefore not considered that is not to the detriment of the rural economy or Goole.

			<p>Further, the references to skilled and qualified labour should be deleted. Firstly, these terms are not defined and could lead to ambiguity, or even divisiveness, between attempting to categorise skilled and unskilled labour. Secondly, the statement could prejudice labour that is perceived as being unskilled and unqualified, to the detriment of those sectors. As such, in relation to Question 2, Objective 11 is generally appropriate but is unsound as currently drafted.</p> <p>Proposed Change</p> <p>Consequently, for Objective 11 to be considered sound it needs to be revised as follows:</p> <p>'Grow, strengthen, modernise and diversify the local economy [DELETE 'including the East Riding's town centres] and support both existing and emerging economic sectors and clusters, [DELETE 'particularly those requiring skilled and qualified labour']</p>	<p>The references to skilled and qualified labour have been removed to reflect these comments.</p>
Mr Pete Sulley, Barton Willmore on behalf of Central Land Holdings,	Object	CSPA/1960	See response to CSPA/1745	See officer comment to CSPA/1745
Nathan Smith, Barton Willmore on behalf of Kayterm Plc	Support with conditions	CSPA/1929	<p>Objective 6</p> <p>Objective 6 of the Core Strategy Preferred Approach seeks to "Significantly increase the provision of affordable housing" in East Riding. Our Client is pleased to note that the Objective includes reference to the provision of affordable housing to be made in accordance with the most up-to-date assessment of identified needs". However, our Client objects to this Objective on the basis that it fails to take into account the fact that the provision of affordable housing can have a considerable impact on the viability of housing developments, especially when taken into consideration with other obligations that may be requested by the Council as well as any abnormal costs associated with particular sites.</p> <p>Therefore, our Client believes in order for this Objective to be deliverable and therefore effective under the test of soundness set out in PPS3, reference should be made to the increase of affordable housing based on assessments of viability as well as up-to-date assessments of need. It is therefore considered that this Objective should be</p>	<p>Objective 6 highlights that the Local Plan should seek to increase the provision of affordable housing. This will primarily be delivered through policy H2 which takes viability considerations into account.</p>

			amended to reflect the impact of affordable housing on viability.	
Nathan Smith, Barton Willmore on behalf of Kayterm Plc	Support with conditions	CSPA/1930	<p>Objective 8</p> <p>Overall, our Client is generally supportive of Objective 8, which seeks to "Ensure a deliverable and flexible supply of housing land". However, it is noted that this Objective does not make any reference to the need described by PPS3 (paragraph 60) to identify a rolling five year supply of deliverable housing sites. We note that it is the intention of the Coalition Government to rationalise the national planning framework. However, as per our comments in relation to the proposed abolition of the RSS at paragraphs 3.4 and 3.5 (above), there is no framework yet in place that provides any other guidance than that set out in the current raft of Planning Policy Guidance and Statements, such that the principle of ensuring a rolling five year supply of deliverable housing sites should be adhered to. On this basis, our Client considers that Objective 8 should be amended to reflect the need to ensure a rolling five year supply of deliverable housing sites in accordance with paragraph 60 of PPS3.</p> <p>Furthermore, we also note that Objective 8 declares that housing land should be "... managed to achieve regional targets..." Here it is noted that part 5 of Policy H2 of the RSS, which continues to form part of the statutory development plan, states that housing figures set in the RSS should not be treated as ceilings. Our Client therefore recommends that Objective 8 should be amended to read: "... managed to achieve regional targets as a minimum in addition to overall regeneration and transformation aspirations."</p>	Comments noted. The requirement for a 5 year supply of housing land to be identified is set out in national policy and so does not need to be repeated in the Strategy Document objectives. References to regional targets have been amended to reflect these comments.
Nathan Smith, Barton Willmore on behalf of Kayterm Plc	Support with conditions	CSPA/1931	<p>Objective 9</p> <p>Our Client supports the part of Objective 9 that refers to developing sites at densities which are reflective of local circumstances. However, our Client strongly objects to the implication in the second clause of the Objective that the supply of previously developed sites should all be developed in advance of the 'managed release' of greenfield sites.</p> <p>Whilst PPS3 sets out that there should be a presumption in</p>	Comments noted. Objective 9 has been amended to reflect these comments.

			<p>favour of previously developed sites, it also notes the need to maintain a flexible and responsive supply of land for housing. Furthermore, we note that not all previously developed sites will be immediately deliverable due to potential site constraints. In order to avoid back-loading of housing, our Client therefore considers that deliverable greenfield sites should be brought forward for development in parallel with deliverable previously developed sites to ensure that the housing figures set out in the RSS are achieved in accordance with Objective 8 of the Core Strategy and PPS3.</p> <p>On the basis of the above, our Client therefore recommends that Objective 9 is amended to remove the word 'greenfield' from it.</p> <p>Question 2</p> <p>By and large, our Client agrees that the 21 proposed objectives for the LDF are appropriate. However, in accordance with our comments made at paragraphs 4.7 to 4.17 (inclusive) above, our Client considers that the Objectives can be improved and has given its rationale for and indications of changes that should be made to achieve this.</p>	
Angela Brown,	Observations	CSPA/2304	<p>With reference to the LDF Spatial Strategy Objectives, Section 3.1, page 21, Objective 16, I consider the word “appropriate” ought to be inserted to read as “Recognise the international, national and local importance of our natural environment and biodiversity, protect our high quality landscapes, identify and protect networks of green infrastructure and enhance opportunities for appropriate countryside recreation”. Recreational pressure is recognised as a potential threat to nature conservation (East Yorkshire Borough Wide Local Plan Policy EN4 and Habitats Regulations Assessment Stage 1 Screening pages, Conservation Objectives of the International Site, pages 3and 32).</p>	<p>The importance of protecting and enhancing biodiversity is identified in objective 17, and this is reflected in policy H4. The relative benefits of a recreational proposal, against impacts on conservation, will be assessed on a case by case basis in accordance with the Local Plan and other relevant policies.</p>
Mr Pete Sulley, Barton Willmore on behalf of The Kingswood Parks Development Company Ltd,	Other	CSPA/1938	<p>See response to CSPA/1730</p>	<p>See officer comment to CSPA/1730</p>

Mr Pete Sulley, Barton Willmore on behalf of The Kingswood Parks Development Company Ltd,	Other	CSPA/1939	See response to CSPA/1735	See officer comment to CSPA/1735
Mr Pete Sulley, Barton Willmore on behalf of The Kingswood Parks Development Company Ltd,	Object	CSPA/1940	See response to CSPA/1698	See response to CSPA/1698
Mr Pete Sulley, Barton Willmore on behalf of The Kingswood Parks Development Company Ltd,	Object	CSPA/1941	See response to CSPA/1621	See officer comment to CSPA/1621
Mr Pete Sulley, Barton Willmore on behalf of The Kingswood Parks Development Company Ltd,	Object	CSPA/1942	See response to CSPA/1745	See officer comment to CSPA/1745
Mr Pete Sulley, Barton Willmore on behalf of Humber Growers/Shirethorn Ltd	Object	CSPA/1932	See response to CSPA/1730	See officer comment to CSPA/1730
Mr Pete Sulley, Barton Willmore on behalf of Humber Growers/Shirethorn Ltd	Object	CSPA/1933	See response to CSPA/1735	See officer comment to CSPA/1735
Mr Pete Sulley, Barton Willmore on behalf of Humber Growers/Shirethorn Ltd	Object	CSPA/1934	See response to CSPA/1713	See officer comment to CSPA/1713
Mr Pete Sulley, Barton Willmore on behalf of Humber Growers/Shirethorn Ltd	Object	CSPA/1935	See response to CSPA/1621	See officer comment to CSPA/1621
Mr Pete Sulley, Barton Willmore on behalf of Humber	Object	CSPA/1936	As previously mentioned in relation to earlier objectives, it is inappropriate to specifically refer to particular groups. Objective 11 specifically refers to town centres and such an	Comments noted. Objective 11 has been amended to reflect these comments.

Growers/Shirethorn Ltd			<p>emphasis could therefore be to the detriment of the rural economy or, in this instance, Elloughton cum Brough, which although not a town centre in PPS4 terms, it still acts as an important Local Service Centre and obviously has been designated accordingly in the settlement hierarchy. As such, the specific reference to town centres should be deleted.</p> <p>Further, the references to skilled and qualified labour should be deleted. Firstly, these terms are not defined and could lead to ambiguity, or even divisiveness, between attempting to categorise skilled and unskilled labour. Secondly, the statement could prejudice labour that is perceived as being unskilled and unqualified, to the detriment of those sectors. As such, in relation to Question 2, Objective 11 is generally appropriate but is unsound as currently drafted.</p> <p>Proposed Change Consequently, for Objective 11 to be considered sound it needs to be revised as follows: [Delete "...including the East Riding's town centres,..." and "...particularly those requiring skilled and qualified labour."].</p>	
Mr Pete Sulley, Barton Willmore on behalf of Humber Growers/Shirethorn Ltd	Object	CSPA/1937	See response to CSPA/1745	See officer comment to CSPA/1745
Mr Pete Sulley, Barton Willmore on behalf of David Watts,	Object	CSPA/1924	See response to CSPA/1730	See officer comment to CSPA/1730
Mr Pete Sulley, Barton Willmore on behalf of David Watts,	Object	CSPA/1925	See response to CSPA/1735	See officer comment to CSPA/1735
Mr Pete Sulley, Barton Willmore on behalf of David Watts,	Object	CSPA/1926	See response to CSPA/1698	See response to CSPA/1698
Mr Pete Sulley, Barton Willmore on behalf of David Watts,	Object	CSPA/1927	See response to CSPA/1621	See officer comment to CSPA/1621
Mr Pete Sulley, Barton Willmore on behalf of	Object	CSPA/1928	See response to CSPA/1745	See officer comment to CSPA/1745

David Watts,				
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