

Chapter 11

Paragraph 11.2				
Consultee	Nature Of Response:	Comment ID	Response	Officer Comments
Mr Richard Borrie,	Observations	CSPA/769	Whilst the rest of the Core Strategy is detailed and comprehensive, the section on Delivery and Monitoring is currently inadequate and requires substantial improvement. In particular, there is no detail on the cost and source of funding for the Council's proposals. In the absence of a proper financial plan, and a delivery and project management approach, the Core Strategy is currently still no more than an aspirational document. It is worth noting Cllr. Parnaby's comment to the Hull Daily Mail about the new government's emergency budget on the 22nd June 2010? Until then [the October 2010 Comprehensive Spending Review], we won't really know the true scale of the likely spending cuts we will be facing for the next three years Cllr. Parnaby is also quoted by the BBC News website (23rd June 2010) saying that the Council will be making cuts of over 30m over the next 3-4 years. Neither of these comments is consistent with the Core Strategy, which requires a dramatic increase in Council funding. I would therefore like to see a much clearer explanation from the Council about how it intends to fund the Core Strategy.	A comprehensive Strategy delivery plan has now been added, following the findings of the East Riding Infrastructure Study. Schemes will be delivered through a variety of funding sources, including developer contributions.
Paragraph 11.4				
Consultee	Nature Of Response:	Comment ID	Response	Officer Comments
Mr Richard Borrie,	Observations	CSPA/770	The first sentence is incorrect - the granting or refusal of planning applications is a minor part of the strategy implementation. The second sentence confirms this interpretation.	Comments noted.

Paragraph 11.5				
Consultee	Nature Of Response:	Comment ID	Response	Officer Comments
Mr Richard Borrie,	Observations	CSPA/771	Whilst implementation of the Core Strategy will of course require the Council to work closely with other public service partners, I would like to see a stronger statement that the Council has overall ownership for management and delivery. Ideally the Core Strategy should include a statement of responsibility by the Chief Executive of the Council.	Comments noted
Mr David Renwick, East Riding Of Yorkshire Council	Observations	CSPA/1342	It is good that the role of the LSP partners is mentioned in relation to the delivery of the LDF. We would like to see, however, a little bit more detail added with examples of work that LSP sub-groups are steering, e.g. the Sustainable Natural Environment Task Group and the ERYBAP, the Sustainable Economic Development Task Group and the Economic Development Strategy. This will ensure that these linkages to the LDF are strengthened and work that contributes to its delivery is properly acknowledged.	A comprehensive Strategy Document delivery plan has now been added, following the findings of the East Riding Infrastructure Study, which includes the main delivery organisations and where and what they will be funding.
Nathan Smith, Barton Willmore on behalf of Galliford Try (Strategic) Land, Galliford Try (Strategic) Land	Object	CSPA/1623	We refer to paragraph 11.5 which sets out that the Council, as well as developers and landowners all have a part to play in the implementation of the Strategy. Our client does not have any fundamental objections to the targets however we note that PPS12 sets out that Core Strategies will need to be able to effectively deal with changing circumstances. Galliford believes that there is a need for flexibility to ensure that not too many constraints, thresholds and financial requirements are placed on developers and land owners to the point that it becomes economically unviable to develop. We also note that many of the targets included in Table 11 have not been finalised. Therefore Galliford reserves the right to make representations on these at the appropriate time.	Noted. The Draft Strategy Document has been prepared with flexibility built in and a robust monitoring system will help to identify the need to review approaches if necessary.

			Proposed Changes Galliford believes that there is a need for flexibility within the supporting text of the policies and the policies.	
Paragraph 11.6				
Consultee	Nature Of Response:	Comment ID	Response	Officer Comments
Mr Richard Borrie,	Support	CSPA/772	The Core Strategy will have a profound effect on the nature of the East Riding and it is vital that all other Council and Partner strategies are fully aligned and subordinate to it. Over the past 15 years there have been situations where the local NHS has not appeared to be on board with the Council's housing development plans, resulting in a period where some local NHS services were seriously stretched, so it is good to see statements such as 11.6.	Support welcomed
Paragraph 11.7				
Consultee	Nature Of Response:	Comment ID	Response	Officer Comments
Mr Richard Borrie,	Object	CSPA/773	This is the only reference in a 250-page strategy document which mentions the key issue of affordability. Much more detail is required on (a) the cost of the proposals and (b) how the Council intends to pay for it. One way to approach this would be to include costs against each of the main sub-headings. [UNDERLINED FOR EMPHASIS] I am very concerned that this critical stage of the LDF consultation has been undertaken without providing respondents with the key financial detail that is needed to make a proper assessment of the strategy. [END UNDERLINING]	A comprehensive Strategy Document delivery plan has now been added, following the findings of the East Riding Infrastructure Study, which includes funding sources, further financial details of the plan can now be found in the Council's Infrastructure Study.
Paragraph 11.8				
Consultee	Nature Of Response:	Comment ID	Response	Officer Comments
Mr Richard Borrie,	Object	CSPA/774	This section must include more detail on how the	A comprehensive Strategy Document

			Council will drive implementation through other partners.	delivery plan has now been added, following the findings of the East Riding Infrastructure Study, which includes the main delivery organisations and where and what they will be funding.
Paragraph 11.9				
Consultee	Nature Of Response:	Comment ID	Response	Officer Comments
Mr Richard Borrie,	Support with conditions	CSPA/775	This is broadly correct, but more detail is needed on how the Council and its partners will monitor the delivery and enforce compliance with it across various partners, including developers and other public service organisations. The consequences of the un-controlled growth of the last 15 years are all around us. Let's not make the same mistakes again.	A comprehensive Strategy Document delivery plan has now been added, following the findings of the East Riding Infrastructure Study.
Paragraph 11.13				
Consultee	Nature Of Response:	Comment ID	Response	Officer Comments
Mr Richard Borrie,	Object	CSPA/776	The way this paragraph is currently written implies that the Council will be a passive observer in the implementation of the Strategy, merely creating supplementary policies if the main strategy is overtaken by events. I feel this is too flimsy for the scale of change which the Core Strategy proposes. I want to see a clear statement of how the Council will scrutinise delivery and implementation of the Strategy, and will be able to take the necessary steps to bring developers, other partners, or other departments of the Council back into line if the implementation is diverging from the strategy. This should include financial penalties on developers and other partners if infrastructure and services required for the Core Strategy is not delivered on time. Whilst the Council cannot impose financial penalties on itself, there does need to be some mechanism for ensuring that	Comments noted.

senior officers within Council departments involved in the delivery of the Core Strategy are held to account if things go wrong. This may require the Council to establish an arms-length organisation, perhaps with other stakeholders, to supervise the delivery.

Question 42

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/70	<p>The following additional indicators are required: ?Gross additional new homes and clearance rates are also required within the monitoring. ?Number of shared equity / social rented affordable housing The monitoring considerations will need to be updated by figures which are amended when regional housing targets are eliminated and those other elements which are altered through consultation.</p>	Net additional homes indicator has been added. Indicator for number of affordable homes has been added. New locally derived housing figure used.
Mr Alastair McIntyre, Government Office for Yorkshire and the Humber	Observations	CSPA/155	On delivery and monitoring (section 11) the responsible agencies (ie delivery partners) are identified but there is no evidence of commitment. You will need to be prepared to be clear about this at examination.	A comprehensive Strategy Document delivery plan has now been added, following the findings of the East Riding Infrastructure Study, which includes the main delivery organisations and where and what they will be funding.
Mr Peter Godfrey, Highways Agency	Observations	CSPA/384	<p>It is requested that an additional indicator and target are added to the sustainable transport policy relating to the number of travel plan developed. It is also suggested that East Riding investigate the use of a travel planning monitoring software, as is being used in other parts of the region, to monitor the on-going impact of travel plans in a consistent way. If you would like to discuss the options for on-going monitoring of travel plans in more detail with the Highways Agency please contact Sarah Watson Quirk. The comments in this response reflect the cumulative impact of East Riding of Yorkshire development aspirations, the impact of specific sites has been</p>	Comments noted

			<p>considered in the Highways Agency response to the Allocations DPD, which should be considered in conjunction with this response.</p> <p>Our LDF consultants, JMP Consultants Ltd supported by Aecom have a team of transport planners and engineers available to work with you to support a sustainable development framework. The Highways Agency request that a written response to their comments is provided, making available additional evidence where it has been highlighted as necessary.</p>	
Ian Smith, English Heritage Yorkshire Region	Observations	CSPA/470	<p>Policy HQE3: English Heritage now provides annual at risk data on a whole range of heritage assets. The Indicator and Target should be amended to reflect this. Suggested amendment: Amend the Indicator to read:- ?Number of heritage assets on the English Heritage ?Heritage at Risk Register?</p>	Comments noted
Mr Richard Borrie,	Object	CSPA/777	<p>These indicators are not appropriate for monitoring the implementation of the Strategy because:(a) Many of the proposed indicators are not measurable, and for those that are (e.g. % of jobs in Hull held by commuters from East Riding) there is no current value or acceptable range of desired values. (Incidentally, it is not clear why the Council is only concerned with commuting to Hull, when commuting to York and Leeds are presumably equally worthy of monitoring).(b) They are not linked to the objectives of the Strategy but instead appear to be passive observations of the state of the East Riding.(c) None of the indicators cover the financial aspects of the Strategy. This means there is no method for monitoring the budgetary impact of the implementation and ensuring that costs are kept under control. Given that the Core Strategy sets out population growth targets approaching 30% in some areas, it is vital that the Council is able to monitor the financial progress of the implementation. The financial indicators should include target ranges for East Riding share of central government funding for things such as integrated transport (per passenger) and school</p>	<p>Noted. In the Draft Strategy Document, the monitoring indicators are structured around five main themes of the document (spatial strategy, housing, economy, environment and community) and more targets have been introduced.</p> <p>The planning system has no influence over many of the financial indicators outlined. Along with those, other indicators such as traffic accidents and council tax levels are more suited to the Community Plan or the Council's Business Plan.</p>

			<p>(per pupil) in comparison with neighbouring local authorities and other large rural authorities elsewhere in the UK, and forecast Council Tax levels. (d) I think many of the indicators are rather remote from the lives of real people. Since the a key objective of the Core Strategy is to provide a high quality of life for the local community I would like to see better use of indicators which more clearly monitor the impact of the Core Strategy implementation on people's daily lives. The proposed indicator on house price multiples is useful, but I suggest others might include accident rates on the main roads, frequency of bus services, size of school classes, waiting times for an allotment, ratios of healthcare workers per head of population etc. There should also be a commitment on Council Tax levels, as the regular above-inflation rises that have been a feature of the last round of development are not sustainable, and Council Tax payers should not be seen as the financial back-stop if the Council fails to secure funding from central government, other partners, and developers. Overall I think the indicators need to be completely reviewed. As a minimum each indicator must be measureable, and the current value of the indicator along with acceptable ranges for the duration of the Strategy must be provided.</p>	
Ms Maureen Bell, Bridlington & District Civic Society	Support	CSPA/1250	<p>Any Plan or Framework is subject to two factors - Interpretation and Implementation. In Table 11, following Delivery and Monitoring, there is a thorough list of Responsible Agencies, but there is little mention of voluntary bodies being used in the monitoring process. Most such bodies are made up of people who are resident in the East Riding. They don't just invest money in the East Riding, they invest their lives. They will wish to continue to be involved in future plans for all Core Strategy Objectives, not just No's 16, 20 and 21. Consultation with residents should be built into this section of the Framework.</p>	Comments noted
Mr David Renwick, East	Observations	CSPA/1371	HQE6 ? NI89 is currently impossible to report against,	National indicators have been removed

Riding Of Yorkshire Council			as CFMPs and SMPs are not yet adopted. In addition there is no designated CCMA as yet and this would require additional SPD, in the interim this could relate to the SMP2 data once the plan has been adopted.	and have been replaced by locally derived Strategy indicators. This particular indicator has been removed from the Draft Strategy Document.
Mr David Renwick, East Riding Of Yorkshire Council	Observations	CSPA/1372	HQE9 ? We would like to see an indicator and target for this policy regarding the area of habitat to be created that is included within minerals site restoration plans and delivered through site restoration.	Comments noted
Mr David Renwick, East Riding Of Yorkshire Council	Support with conditions	CSPA/1353	We are pleased to see that NI 189 and 197 are included. NI189 is listed, but as this uses progress against the action plans of CFMPs and SMPs that have not been completed in the East Riding it does not provide appropriate criteria for a local context indicator. A local proxy definition has been used within the Local Area Agreement, using the progress of the SMP review process (% completed) as a proxy key performance indicator, this could be used in the LDF as an interim measure until the CFMP and SMP have been completed.	National indicators have been removed and have been replaced by locally derived Strategy indicators. The former NI189 indicator has been removed.
Mr David Renwick, East Riding Of Yorkshire Council	Observations	CSPA/1354	It would be useful to have the policy name listed in this Table in the first column next to the policy number. In addition it would be useful to have a list of the policies at the front of the document at the end of the contents page giving the policy title and page number.	Noted. Space does not permit the insertion of the policy name in the indicators table. A list of polices now added to the contents page.
Mr David Renwick, East Riding Of Yorkshire Council	Object	CSPA/1355	SS3 - While it is useful to monitor, we do not feel that the number of planning permissions granted for the roll back of a property provides a useful output indicator. By its nature coastal erosion does not occur at a constant rate and therefore the need for properties to rollback will fluctuate considerably from year to year depending on the current rate of erosion.	Noted. Indicator removed
Mr David Renwick, East Riding Of Yorkshire Council	Observations	CSPA/1356	HQE1 - We would be keen to see here an indicator and target for the number of properties that have delivered appropriate habitat mitigation and enhancement as part of the design. Alternatively this could be based on the uptake of the ecological aspects of BREEAM assessment.	Noted. The indicators in the Draft Strategy Document are focussed on those which directly measure the outputs and outcomes of the Strategy and which can be measured with the resources available.
Mr David Renwick, East	Object	CSPA/1344	We think that the LDF could make more links with the	Noted. National indicators have been

Riding Of Yorkshire Council			<p>LAA and the SCP in its approach to monitoring in Section 11 to avoid duplication of effort. For example, NI 186 Per capita reduction in CO2 emissions in the LA area and NI 185 Percentage CO2 reduction from local authority operations should be included in the 'Environment' section of Table 10 on p228. Another example could be in Table 11, where the LAA indicator (NI 155 Number of affordable homes delivered (gross)) is not included as a measure.</p> <p>We feel that if specific national indicators are to be used in the approach to monitoring then we must consider how these link to the specific policies they have been linked to. For example how does NI 197 help to monitor the delivery of the biodiversity policy? We need to make sure that the biodiversity policy promotes the action that this indicator is monitoring, so the biodiversity policy and developer contributions in the LDF should encourage development to contribute towards the active management of Local Sites. Consideration of this type of link should be made for all indicators selected.</p>	<p>removed and have been replaced by locally derived Strategy indicators. The indicators in the Draft Strategy Document are focussed on those which directly measure the outputs and outcomes of the Strategy and which can be measured with the resources available. In addition, the Strategy does not wish to duplicate indicators which are recorded through other mechanisms.</p>
Mr David Renwick, East Riding Of Yorkshire Council	Observations	CSPA/1374	<p>PE3 - NI 10 visits to museums and galleries is no longer a national indicator, as it was removed in April 2010. The final result for this indicator will be published in October 2010.</p>	Noted.
Mr David Renwick, East Riding Of Yorkshire Council	Observations	CSPA/1358	<p>HQE2 - Proportion of local sites in each of the policy elements/geographic landscape areas listed that can be demonstrated as in active management and the number of these that have been brought into management through the planning system (NI197). Private business and property / land owners should be included in the final column.</p>	<p>Noted. National indicators have been removed and have been replaced by locally derived Strategy indicators. The indicators in the Draft Strategy Document are focussed on those which directly measure the outputs and outcomes of the Strategy and which can be measured with the resources available. In addition, the Strategy does not wish to duplicate indicators which are recorded through other mechanisms.</p>
Mr David Renwick, East	Observations	CSPA/1359	<p>HQE3 - Given the first policy element relates to national</p>	Noted. An indicator relating to the

Riding Of Yorkshire Council			and international designated sites there should be some indicator relating to appropriate assessment/habitats regulations assessment and/or to the condition of these sites.	number of assets 'at risk' is included in the Draft Strategy Document.
Mr David Renwick, East Riding Of Yorkshire Council	Support with conditions	CSPA/1360	HQE4 - We feel that the indicators for this policy are in the right area and cover the right topics, but we may need to make them more SMART and link them to the targets that we will develop for the emerging ERYBAP habitat and species action plans. The development of a Biodiversity SPD would tease out the linkages with the ERYBAP and allow us to set more meaningful targets against which to monitor the LDF. Private business and property / land owners should be included in the final column.	Noted. An indicator relating to the progress against targets in ERYBAP Habitat Action Plans and Species Action Plans is included in the Draft Strategy Document. Developers are noted in the delivery column.
Mr David Renwick, East Riding Of Yorkshire Council	Object	CSPA/1361	HQE5 - We feel that the indicators for GI need to be more considered, this should be based on additional detail set out through a potential GI SPD which would also allow the local level GI networks to be developed that would give detail on what are the most important elements/functions for GI in a given area and therefore what GI should be monitored against. Private business and property / land owners should be included in the final column.	Noted. The indicators in the Draft Strategy Document are focussed on those which directly measure the outputs and outcomes of the Strategy and which can be measured with the resources available. In addition, the Strategy does not wish to duplicate indicators which are recorded through other mechanisms.
Mr Pete Sulley, Barton Willmore on behalf of Central Land Holdings, Central Land Holdings	Observations	CSPA/1664	10.1. Representations have already been made on paragraph 11.3 and Table 11 (Policy SS4) elsewhere in this paper therefore they are not repeated here. However, the Proposed Change is reiterated below for completeness and for ease of reference. 10.2. In terms of paragraph 11.5, it is evident that all stakeholders have a part to play in delivering the vision and objectives, and ultimately the Core Strategy itself, over the Plan period. Therefore it is vital that the flexibility that has been suggested throughout these representations is introduced to ensure that too many constraints, thresholds and financial requirements are not placed on developers and land owners to the point that it becomes economically unviable to develop.	Noted. The Draft Strategy Document has been prepared with flexibility built in and a robust monitoring system will help to identify the need to review approaches if necessary.

			<p>10.3. Such rigid imposition could effectively lead to a moratorium on development by developers and landowners as they concentrate their efforts elsewhere in the country. This would be to the sever detriment of East Riding as a whole as the development industry would stagnate, resulting in almost inevitable failure to achieve the vision and objectives.</p> <p>10.4 Further, it appears that many of the targets in Table 11 have not yet been set. Central Land Holdings therefore reserves the right to make representations on these at the appropriate time.</p> <p>Proposed Change</p> <p>10.5. In order for the targets in Policy SS4 in Table 11 to be accurately monitored there needs to be consistency between the percentage requirements. Consequently, specific proposed changes are not suggested here.</p> <p>10.6. Further, it must be ensured that the flexibility within the supporting text of the policies and the policies themselves is reflected in the [currently] purely numerical percentage targets. This will ensure consistency between the vision and objectives, the policies and the targets as well as avoiding any ambiguity in the future.</p>	
Mr Pete Sulley, Barton Willmore on behalf of Central Land Holdings, Central Land Holdings	Observations	CSPA/1724	<p>Representations have already been made on paragraph 11.3 and Table 11 (Policy SS4) elsewhere in this paper therefore they are not repeated here. However, the Proposed Change is reiterated below for completeness and for ease of reference.</p> <p>In terms of paragraph 11.5, it is evident that all stakeholders have a part to play in delivering the vision and objectives, and ultimately the Core Strategy itself, over the Plan period. Therefore it is vital that the flexibility that has been suggested throughout these representations is introduced to ensure that too many constraints, thresholds and financial requirements are not placed on developers and land owners to the point that it becomes economically unviable to develop.</p> <p>Such rigid imposition could effectively lead to a</p>	Noted. The Draft Strategy Document has been prepared with flexibility built in and a robust monitoring system will help to identify the need to review approaches if necessary.

			<p>moratorium on development by developers and landowners as they concentrate their efforts elsewhere in the country. This would be to the sever detriment of East Riding as a whole as the development industry would stagnate, resulting in almost inevitable failure to achieve the vision and objectives.</p> <p>Further, it appears that many of the targets in Table 11 have not yet been set. Central Land Holdings therefore reserves the right to make representations on these at the appropriate lime.</p> <p>Proposed Change</p> <p>In order for the targets in Policy S54 in Table 11 to be accurately monitored there needs to be consistency between the percentage requirements. Consequently, specific proposed changes are not suggested here.</p> <p>Further, it must be ensured that the flexibility within the supporting text of the policies and the policies themselves is reflected in the [currently] purely numerical percentage targets. This will ensure consistency between the vision and objectives, the policies and the targets as well as avoiding any ambiguity in the future.</p>	
<p>Mr Pete Sulley, Barton Willmore on behalf of The Kingswood Parks Development Company Ltd,</p>	<p>Object</p>	<p>CSPA/1695</p>	<p>Representations have already been made on paragraph 11.3 and Table 11 (Policy S54) elsewhere in this paper therefore they are not repeated here. However, the Proposed Change is reiterated below for completeness and for ease of reference.</p> <p>In terms of paragraph 11.5, it is evident that all stakeholders have a part to play in delivering the vision and objectives, and ultimately the Core Strategy itself, over the Plan period. Therefore it is vital that the flexibility that has been suggested throughout these representations is introduced to ensure that too many constraints, thresholds and financial requirements are not placed on developers and land owners to the point that it becomes economically unviable to develop.</p> <p>Such rigid imposition could effectively lead to a moratorium on development by developers and</p>	<p>Noted. The Draft Strategy Document has been prepared with flexibility built in and a robust monitoring system will help to identify the need to review approaches if necessary.</p>

			<p>landowners as they concentrate their efforts elsewhere in the country. This would be to the sever detriment of East Riding as a whole as the development industry would stagnate, resulting in almost inevitable failure to achieve the vision and objectives.</p> <p>Further, it appears that many of the targets in Table 11 have not yet been set. KPDC therefore reserves the right to make representations on these at the appropriate time.</p> <p>Given the nature of these representations, it is also considered appropriate that the progression of Kingswood is monitored, so that North Kingswood can be released at the appropriate time, which could be within this Plan period.</p> <p>Proposed Change</p> <p>In order for the targets in Policy S54 in Table 11 to be accurately monitored there needs to be consistency between the percentage requirements. Consequently, specific proposed changes are not suggested here.</p> <p>Further, it must be ensured that the flexibility within the supporting text of the policies and the policies themselves is reflected in the [currently] purely numerical percentage targets. This will ensure consistency between the vision and objectives, the policies and the targets as well as avoiding any ambiguity in the future.</p> <p>Finally, monitoring mechanisms need to be established for Kingswood so that an accurate assessment can be made at the appropriate time about the extension of Kingswood into North Kingswood, which is likely to be towards the end of the Plan period.</p>	
<p>Mr Pete Sulley, Barton Willmore on behalf of Central Land Holdings, Central Land Holdings</p>	<p>Observations</p>	<p>CSPA/1781</p>	<p>Representations have already been made on paragraph 11.3 and Table 11 (Policy SS4) elsewhere in this paper therefore they are not repeated here. However, the Proposed Change is reiterated below for completeness and for ease of reference.</p> <p>In terms of paragraph 11.5, it is evident that all stakeholders have a part to play in delivering the vision</p>	<p>Noted. The Draft Strategy Document has been prepared with flexibility built in and a robust monitoring system will help to identify the need to review approaches if necessary.</p>

			<p>and objectives, and ultimately the Core Strategy itself, over the Plan period. Therefore it is vital that the flexibility that has been suggested throughout these representations is introduced to ensure that too many constraints, thresholds and financial requirements are not placed on developers and land owners to the point that it becomes economically unviable to develop.</p> <p>Such rigid imposition could effectively lead to a moratorium on development by developers and landowners as they concentrate their efforts elsewhere in the country. This would be to the sever detriment of East Riding as a whole as the development industry would stagnate, resulting in almost inevitable failure to achieve the vision and objectives.</p> <p>Further, it appears that many of the targets in Table 11 have not yet been set. Central Land Holdings therefore reserves the right to make representations on these at the appropriate time.</p> <p>Proposed Change</p> <p>In order for the targets in Policy SS4 in Table 11 to be accurately monitored there needs to be consistency between the percentage requirements. Consequently, specific proposed changes are not suggested here.</p> <p>Chapter 11 - Delivery and Monitoring</p> <p>Further, it must be ensured that the flexibility within the supporting text of the policies and the policies themselves is reflected in the [currently] purely numerical percentage targets. This will ensure consistency between the vision and objectives, the policies and the targets as well as avoiding any ambiguity in the future.</p>	
<p>Mr Pete Sulley, Barton Willmore on behalf of Humber Growers/Shirethorn Ltd</p>	<p>Observations</p>	<p>CSPA/1708</p>	<p>Representations have already been made on paragraph 11.3 and Table 11 (Policy SS4) elsewhere in this paper therefore they are not repeated here. However, the Proposed Change is reiterated below for completeness and for ease of reference.</p> <p>In terms of paragraph 11.5, it is evident that all stakeholders have a part to play in delivering the vision</p>	<p>Noted. The Draft Strategy Document has been prepared with flexibility built in and a robust monitoring system will help to identify the need to review approaches if necessary.</p>

			<p>and objectives, and ultimately the Core Strategy itself, over the Plan period. Therefore it is vital that the flexibility that has been suggested throughout these representations is introduced to ensure that too many constraints, thresholds and financial requirements are not placed on developers and land owners to the point that it becomes economically unviable to develop.</p> <p>Such rigid imposition could effectively lead to a moratorium on development by developers and landowners as they concentrate their efforts elsewhere in the country. This would be to the sever detriment of East Riding as a whole as the development industry would stagnate, resulting in almost inevitable failure to achieve the vision and objectives.</p> <p>Further, it appears that many of the targets in Table 11 have not yet been set. The Humber Growers Group therefore reserves the right to make representations on these at the appropriate time.</p> <p>Proposed Change</p> <p>In order for the targets in Policy SS4 in Table 11 to be accurately monitored there needs to be consistency between the percentage requirements. Consequently, specific proposed changes are not suggested here.</p> <p>Further, it must be ensured that the flexibility within the supporting text of the policies and the policies themselves is reflected in the [currently] purely numerical percentage targets. This will ensure consistency between the vision and objectives, the policies and the targets as well as avoiding any ambiguity in the future.</p>	
<p>Mr Pete Sulley, Barton Willmore on behalf of David Watts,</p>	<p>Observations</p>	<p>CSPA/1793</p>	<p>10.1 Representations have already been made on paragraph 11.3 and Table 11 (Policy SS4) elsewhere in this paper therefore they are not repeated here. However, the Proposed Change is reiterated below for completeness and for ease of reference.</p> <p>10.2 In terms of paragraph 11.5, it is evident that all stakeholders have a part to play in delivering the vision and objectives, and ultimately the Core Strategy itself,</p>	<p>Noted. The Draft Strategy Document has been prepared with flexibility built in and a robust monitoring system will help to identify the need to review approaches if necessary.</p>

			<p>over the Plan period. Therefore it is vital that the flexibility that has been suggested throughout these representations is introduced to ensure that too many constraints, thresholds and financial requirements are not placed on developers and land owners to the point that it becomes economically unviable to develop.</p> <p>10.3 Such rigid imposition could effectively lead to a moratorium on development by developers and landowners as they concentrate their efforts elsewhere in the country. This would be to the sever detriment of East Riding as a whole as the development industry would stagnate, resulting in almost inevitable failure to achieve the vision and objectives.</p> <p>10.4 Further, it appears that many of the targets in Table 11 have not yet been set. David Watts therefore reserves the right to make representations on these at the appropriate time.</p> <p>Proposed Change</p> <p>10.5 In order for the targets in Policy SS4 in Table 11 to be accurately monitored there needs to be consistency between the percentage requirements. Consequently, specific proposed changes are not suggested here.</p> <p>10.6 Further, it must be ensured that the flexibility within the supporting text of the policies and the policies themselves is reflected in the [currently] purely numerical percentage targets. This will ensure consistency between the vision and objectives, the policies and the targets as well as avoiding any ambiguity in the future.</p>	
Mrs K. Richmond, South Cave Parish Council	Observations	CSPA/2100	<p>It seems a very bureaucratic system but has little to say on managing. It would seem to us that in the current recession, there is no value in releasing further Greenfield sites as this will not encourage early development which is dependant on other factors outside the control of the Authority. By prematurely releasing further sites it leaves it to developers to cherry pick sites once the economy picks up again, leaving the harder to develop PDL sites.</p>	<p>Comments noted. The council has a duty to respond to the objectives of the National Planning Policy Framework which includes ensuring a ready supply of deliverable sites.</p>

Mrs K. Richmond, South Cave Parish Council	Observations	CSPA/2101	The indicators appear to be based on the policy requirement although the number of indicators appears to us to be unmanageable with the current source open to ERYC. There needs to be a link however, to the economic assessment ERYC is required to produce which should then inform the management, i.e. are other factors reducing activity thereby moderating any response to release further sites.	Noted. The indicators in the Draft Strategy Document are focussed on those which directly measure the outputs and outcomes of the Strategy and which can be measured with the resources available. In addition, the Strategy does not wish to duplicate indicators which are recorded through other mechanisms. The Draft Strategy Document has been prepared with a recognition of the findings from the Local Economic Assessment.
Nathan Smith, Barton Willmore on behalf of Kayterm Plc	Observations	CSPA/1775	11.1 In line with our Comments at paragraph 6.7 and 6.8 (above), we note that there appears to be some confusion between the use of net additional and gross housing numbers and the associated distribution of housing across the Borough. Our Client therefore recommends that a new indicator relating to Policy SS4 is included within Table 11 to set out the distribution of housing based on gross housing figures. 11.2 Overall our Client considers that Chapter 11 sets out an appropriate approach to monitoring the Core Strategy and that the proposed indicators are also appropriate, subject to the inclusion of a new indicator as described in the preceding paragraph.	Noted. The Draft Strategy Document employs a 'net additional homes' approach including an indicator in the final chapter. This will allow for variations in demolitions and other losses to the housing stock.
Nathan Smith, Barton Willmore on behalf of Kayterm Plc	Object	CSPA/1776		
Table 11				
Consultee	Nature Of Response:	Comment ID	Response	Officer Comments
Mr Dave Evans, Humber Archaeology Partnership	Observations	CSPA/2282	HQE3 - You mention the Number of Listed Buildings on the At Risk register, but there are several other indicators of this type which are just as relevant ? such as	Comments noted. The indicator now refers to 'heritage assets at risk'.

			<p>the Number of Scheduled Monuments at Risk, the Number of Registered Battlefields at Risk, the Number of Designated Historic Parks and Gardens at Risk, and the Number of Conservation Areas at Risk. It would be more consistent to amend this to the number of heritage assets on the English Heritage Heritage at Risk Register., as this would give a more rounded picture of the effectiveness of this policy.</p>	
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