

## Response to consultation on the Core Strategy

<b>Question 2 (p22)</b>
<b>Do you think the revised 21 objectives for the LDF are appropriate, or can they be improved?</b>
<b>Obj 3,</b> 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.
<b>Obj 4,</b> We agree that any development should be locally justified and would support all affordable housing, Appendix A “The Sustainability Appraisal Site Assessment Methodology” 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. <i>Development wholly for affordable housing; <u>or</u> 2. Residential development – comprising ..... an average of 5 dwellings per annum in each Supporting Village; or</i> ” 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.
<b>Obj 5,</b> We agree with this objective and this is closely tied into obj 1. Again the SHLAA criteria and scoring need to reflect this objective.
<b>Obj 6,</b> 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
<b>Obj 9,</b> We agree but would need a definition of what is “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 contra-indication of building in rural villages.
<b>Obj 20,</b> We agree with the general objective however 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 ERYC 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.
<b>Obj 21,</b> We agree with this objective but as with obj 20, 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 ERYC 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.

**Question 3 (p27)**

***Are there any other ways in which the LDF can promote sustainable developments and address the issues associated with climate change?***

Specifically by reference to the use of the private motor car and ensuring development takes place where public transport can be sustainably increased (i.e. high density large scale housing) which can create TRICS ratings of good or better, something which South Cave cannot achieve. Sites with direct access to rail should be prioritised, something which for example again South Cave does not have. In the Parish's July 2010 survey 81% of respondents travelled to the station by car. By removing the arbitrary 2 mile buffer from the boundary of major settlements so that development takes place adjacent to the greatest densities of housing and can thereby benefit from and create new opportunities for sustainable transport. The designation of supporting villages should not be used within the central area, unless by exception, as these cannot be justified as "remote" (for example Leven may wish to be included and there may be an argument for RSC/SV status). Policy SS4 should be refocused on the sustainable areas of the sub regional centre's periphery and the RSC and SV quota should be substantially reduced to no more than for example, 8% or even less to avoid dispersed development taking place in the dormitory hotspots.

**Question 4 (p32)**

***Do you agree with the identification of the seven proposed Local Service Centres? If not, please state why.***

We would support Brough/Elloughton as our nearest Local Service centre which reflects the JSP.

**Question 5 (p38)**

***a) Do you agree with the process for identifying Rural Service Centres and supporting Villages? If not, please state why.***

Generally the principle of a network of settlements within a mainly rural environment is the most pragmatic approach, however SS2 H. states "*In order to sustain the overall vitality of rural areas, small-scale development to meet local community needs will be supported in the Rural Service Centres and Supporting Villages, complementing the roles of Local Service Centres in meeting some of the **basic needs in more remote areas.***" We agree with this principle. We would however question several aspects of the process. Firstly, Stage 1, the facilities offered by villages, in the case of South Cave, is incorrect. The garage is outside the village boundary and while not materially affecting South Cave's assessment it brings into question the reliability of the information to hand used in assessing stage 1. Secondly in relation to the need to identify supporting villages relatively near the main urban conurbations within the Central Area, where villages cannot be classed as remote, i.e. South Cave which is only just 2 miles from Brough, similar to other West Hull village distances from the Haltemprice settlements excluded from consideration as SV's at the outset. The use of a 2 mile buffer zone around the major conurbations and proposed LSC areas should be considered fairly arbitrary and could easily be 2.5 miles or 3 miles. The measurement from the edge of the development area is also arbitrary and not consistent with other measurements used elsewhere to measure travelling distances. The process

of identifying SVs should include some measure of catchment area for the village in question, for example South Cave has no rural hinterland to service, although the GP, dentist and school are used by those outside the village using private motor cars, they service mainly the village itself which has become a dormitory village. The proposed stages you would use are, we believe, faulty (although it is recognised this is not an exact science nor is there a right or wrong answer).

Stage 1 b) would seem to indicate the ability of the village to act as a dormitory and able to use public transport to work in an RSS identified settlement, not provide inward transport to support jobs within the RSC or SV.

Stage 1 c) It is dangerous to rely on the 2001 census count in this regard as it doesn't differentiate between "Travel to work by other means or work at home" nor does it give a more accepted measure of FTE jobs nor the range of employment available to those in a potential TTWA for the settlement under consideration.

Stage 2 Assuming the need to identify SVs in the Central Area, using plans provided to the Parish by ERYC, part of South Cave lies within 2 miles of the Brough development limit and South Cave should therefore be excluded in accordance with other West Hull villages. The 2 miles is an arbitrary figure and not a specific critical measurement, used to prevent settlements coalescing. There is no stipulation or logical argument that the entire settlement should be within two miles and indeed for these purposes the distance between the two development limits is the key determinant. The identification of South Cave is not in accordance with your policy as outlined in Para 4.43 as the village is 2 miles from Brough which would not support the consolidation of Brough and growth targeted on Market Weighton, both of which are a priority for development. South Cave, close to Brough, is less likely to perform a service centre role because of its proximity to this larger centre and the role of SVs is to provide a small service hub in those rural parts of the East Riding not already easily served by LSCs, Principal Towns and the Regional City.

Stage 3 adds further settlements into those areas not well integrated (and could be considered fairly arbitrary in nature), but does not address those areas in the west of the Central Area where almost all settlements along the A63 corridor are identified. This is clearly at odds with the underlying principles of the core strategy of supporting higher order settlements and the over supply of potential SV's requires rationalisation. One factor is notable by its omission in these considerations of RSC or SVs, which is a stated policy aim, is the ability of the SV to support the rural community. The potential catchment area of each settlement has not been measured nor the potential journey time by car that such a provision would save by otherwise travelling additional miles to a larger settlement for the same basic service provision. If the measurement of 5 Miles from a LSC is used (90% of the population live within this definition) then there is no area left between Market Weighton, Brough and Willerby for South Cave to serve in a meaningful way. This measurement can be substantially reduced and the same remains true. No

smaller settlement is supported by South Cave under any measurement system used. North Newbald is the most remote village and is still nearer to North Cave and Market Weighton is only a small fraction farther away than South Cave and offers the facilities of a LSC. There is no case for South Cave to be designated a Supporting Village.

**b) Do you agree with the preferred option to identify the 13 Rural Service Centres and 13 Supporting Villages? If not, please state why.**

We agree with b) in that RSCs should be identified to give some certainty to the plan led solution. We do not believe that the requirements to identify SV's in the Central Area are either sound or robust, as for the other sub-areas, given the proximity to the sub regional centre and especially in the West of the Haltemprice settlements, Brough and Market Weighton which adequately cover the requirement for local service centres. We suggest that within the stage 3 in a) above, some remote villages fulfilling the criteria are identified where obvious gaps may appear, for example if required in the North East of the Central Area. South Cave however should not be identified as a Supporting Village for the reasons given in a) above in that the methodology and process used is flawed and not appropriate for all sub-areas of the plan area.

We would support allowing small-scale affordable housing schemes in small settlements where there is an overriding proven need to provide small scale services in remote rural areas. Identifying South Cave as an SV undermines the objective stated in 4.40 of supporting "higher order" settlements as South Cave and it's environs are well-served by other larger settlements identified in the settlement network i.e. Brough. It should be also noted that a policy of dispersed housing development in rural settlements demonstrably failed over 20 years to achieve rural employment and services espoused by the Humberside Structure plan and Beverley Borough Plan. We can use Brough as a local example where Housing was promoted and accompanying commercial and economic development has failed to materialise. The evidence of the previous plans does not support the statement at 4.36 that small-scale development in these (supporting) villages will support the continuation of services and facilities. We agree with your approach set out in 4.37. However the assumption in 4.38 that limited market housing will support an element of affordable housing when levels of 5 units a year are proposed in SVs is unlikely to be achieved even in a robust market and evidence is not given to support this view.

**Question 6 (p40)**

Does the proposed approach set out in Policy SS2 provide an appropriate framework for guiding the location of development and the types of uses that would be acceptable in different locations? If not, please state why?

See also our comments to Q5, which are to paraphrase; the policy emphasis on service remote rural areas is not appropriate in the Central area; the use of a 2 Mile Buffer zone is arbitrary and it's application is questionable especially in sustainability terms in preventing development adjacent to the Sub-Regional Centre and Haltemprice settlements; The stages to identify RSCs and SVs are flawed both in process and application. The general thrust of the

policy SS2 is supported, with the exception of identifying South Cave as a Supporting Village which is in the central area and due to its proximity to the sub regional city and larger higher order settlements, does not have the same policy case for identifying SVs **in remote rural areas**. Para. 4.31 clearly states that *“When taken together, 90% of the East Riding’s population live within 5 miles of the Regional City, the four Principal Towns or the seven proposed Local Service Centres.”* It therefore seems particularly incongruous that so many RSCs and SVs are identified to meet the needs of 10% of the population more than 5 miles away from a higher level settlement. South Cave is well within 5 miles of a LSC and does not support any settlement which is greater than 5 miles from a LSC. It is noted however that para 4.31 is expanded in Para 4.48 which states *“Putting SVs aside, 99% of the East Riding’s population live within four miles of the Regional City, one of the Principal Towns, LSCs or RSCs.”* It is somewhat of interest then that 13 SVs are required to cater for this 1% especially those within in the Western Central Area which appears to be a particularly heavy handed approach to a strategically insignificant issue when considered against the dangers of continued dispersed and unsustainable dormitory development.

Whether there is a need to identify specific sites in the Allocations DPD for SV’s, which are not fulfilling a strategic housing role but only providing 5 dwellings per year for local need is doubtful. In South Cave’s case for example, and discounting the two large sites developed (1 as a windfall site) which provided 45 dwellings, 35 permissions have come forward since 2003. This has been sustained throughout the recession at a reasonably level rate. The allocations favour the larger sites when for example, in South Cave 65% of respondents to the Parish survey would, if housing was required, prefer a number of smaller sites. Affordable housing sites can be dealt with under rural exceptions policy.

Policy H is as stated for Q5 in danger of repeating past mistakes in terms of encouraging dispersed unsustainable development reliant on the private motor car and there may be a case for defining the term “Remote” i.e. in the context of provision of services to those minor settlements that are more than 5 miles away from a LSC or higher order settlements. We would propose that H should have a new paragraph regarding SVs meeting the need of a particular catchment area or defined rural hinterland to make the role of particular SVs clearer and easier for developers to define a “local” housing need.

**Question 7 (p44)**

a) Does the proposed approach set out in Policy SS3 provide an appropriate framework for guiding the location of development and the types of uses that would be acceptable in the Countryside and other rural settlements? If not, please state why.

a) We would agree with the proposed approach.

b) Is the definition of ‘local needs’ clear in respect of new housing?

b) “Local need” as defined by Para 4.62 is adequate for housing purposes. It would be useful to have the local need element attached to policy A2 as a new local economic need i.e. high neighbourhood unemployment which the proposal would help to address, i.e. not promoting commuting from other

adjacent areas. We would propose that A11 should have a new paragraph regarding SVs meeting the need of a particular catchment area or defined rural hinterland to make it easier for developers to define a “local” housing need.

**Question 8 (p54)**

Do you agree with the way we propose to manage proposed Policy SS4? If no, please state why.

SS4 splits the allocations with RSC and SVs yielding 19% of the strategic requirement which is a substantial amount and greater than the sustainable Haltemprice settlements’ 15%, which are better served by services, employment and shopping, being easily reached by the sub regional centre of Hull. It is also of particular note that the RSCs and SVs, identified to serve only 10% of the population (see para 4.31) are providing pro rata the most development in the most unsustainable locations. This would appear to be contrary to the Core Strategy’s sustainability objectives, PPS3 and PPS7 and promoting the failed dispersed development strategy of previous plans (see comments by the Inspector for the JSP EIP<sup>1</sup> with regard to DS4 proposals to split into a and b designations which was previously set aside by ERYC).

<sup>1</sup> **Para 5.4** Government Office for Yorkshire and the Humber (GOYH) expressed concern that proposed replacement Policy DS4b could promote a return to the past pattern of dispersed development which was promoted by the former Humberside Structure Plan (HSP), and which is now contrary to national and regional planning guidance. In particular it argued that the JA should recognise that the avoidance of long distance commuting will place a severe limitation on the level of house building in rural settlements, and make an explicit reference to this in JSP policy. **Para 5.8** These factors support our conclusion that there is no basis for distinguishing between the two sorts of rural settlement in proposed Policy DS4b. Instead, the first part of DD JSP Policy DS4, which deals with development in existing villages, should be carried through to the adopted JSP. It should be expanded to confirm that housing development in existing villages should conform to the requirements of DD JSP Policy H7. That latter policy should be modified to secure that, in every case, housing development should be limited to that which would not lead to increased long distance commuting, with a preference given to previously developed sites, in-fill plots and conversions. **Para 2.12** We conclude that there is no basis for distinguishing between two sorts of rural settlement as suggested in Policy DS4b as proposed by the JA. We recommend that Policy DS4 should deal with only one level of settlement and be reworded to clarify the role of these settlements. We also recommend that Policy H7 should be modified to minimise the risk of commuting from such settlements to the main settlements. **Report of the Panel, Peter Young April 2004**

**Question 9 (p57)**

Does proposed policy SS5 provide an appropriate framework to support the distribution of economic development in the East Riding? If not, please state why.

No employment land is allocated for South Cave and we are content, however as the policy is designed to be flexible to account for Market forces the case for defining local need as in PE2 has to be robust and evidentially based. Policy D appears to leave the door open along the East/West multi modal corridor for transporting and transferring freight and this should be located in the identified employment zones only.

**Question 10 (p59)**

Does proposed Policy SS6 provide an appropriate framework for supporting the viability and vitality of centres across the East Riding? If not, please state why?

With the availability of district retail centres in Market Weighton, which is to be expanded in table 4 and Brough which is to be consolidated, the addition of Supporting Villages in policy A as Local centres is detrimental to the policy. In

South Cave's case this weakens the retail within the local service centres and is a contraindication of South Cave's inclusion as a supporting Village and local centre as it is not in a remote rural setting. The village better fits under Policy B with retail having neighbourhood significance. Para. 4.31 clearly states that "*When taken together, 90% of the East Riding's population live within 5 miles of the Regional City, the four Principal Towns or the seven proposed Local Service Centres.*" It therefore seems particularly incongruous that so many RSC and SVs are identified to meet the needs of 10% of the population more than 5 miles away from a higher level settlement. Para 4. 48 which states "*Putting SVs aside, 99% of the East Riding's population live within four miles of the Regional City, one of the Principal Towns, LSCs or RSCs.*" This is further confirmation that SV's should not be Local centres but better fit policy B in addressing "neighbourhood need".

**Question 11 (p65)**

Does proposed policy SS7 adequately address the East Riding's strategic transport needs, now and into the future? If not, please state why.

If supporting villages are identified in non remote rural areas, most will be reliant on private cars as identified in the 2001 Census where South Cave residents travelled an average 23.54 km to work and where 73.8% used a private car (which in our Parish survey had increased to 77.2% of respondents and 88% of those using the train used a private car to travel to the station). This will increase the load on the strategic network and development should be placed where they have a TRICS rating of good or above to take advantage of the possibilities of public transport. South Cave will never achieve the densities required to provide public transport and the last recent application for a community bus failed. Of the 1675 dwellings only 156 were without a car. The strategic transport policy aims are therefore not reflected adequately in the proposed site assessments and should be more heavily weighted.

Note Figure 8 is incorrect with the bus route west travelling along the railway line from Brough.

**Question 12 (p70)**

Do you agree with the division of the East Riding into these 6 sub areas? If not, please state why.

We can agree with a division into sub areas whether that should be 5 or 6 is not particularly relevant, it's whether the difference between areas can be identified and whether policy measures may need to vary between those areas and we generally agree with the approach that one size doesn't fit all. However the approach taken on supporting villages within SS2 is exactly that. The policy measure of identifying SVs does need an area based approach to account for some areas rural remoteness and other areas, like the Central Area, within the Hull TTWA and adjacent to the sub regional centre.

**Question 13 (p79)**

Does proposed policy SS8 provide an appropriate framework for responding to the key planning issues in the Beverley & Central sub area? If not, please state why.

The sub area approach should allow those remote rural villages in other sub areas to act as a centre for daily shopping and local needs where it is evident such a provision will substantially reduce the need to travel by private car to higher order settlements.

The same cannot be said for the Central Area villages which are substantially dormitories, as borne out by the census statistics and the parish survey July 2010 (In 2001 South Cave residents travelled an average 23.54 km to work and 73.8% used a private car which had increased in 2010 to 77.2% of respondents using a car to work and 88% of those using the train used a private car to travel to the station) and few places in the Central Area can be described to be a “remote rural area” and development only serves to consume greenfield and promote urban dormitory sprawl and dispersed development (an approach not endorsed by the JSP EiP inspector in his comments on the ERYC proposal to further subdivide DS4 settlements). Figure 9 adequately shows the over concentration of RSCs and SVs along the A63 corridor. The failed past policies of the Humberside structure plan and BBC Local Plan are recognised in para. 6.12 where Brough is identified as having massive housing development without the required service and economic development and this should not be replicated on a smaller scale in supporting villages.

Para 6.13 identifies that “many” settlements are commuter settlements but then continues to name most of the settlements other than the smallest as supporting villages which is contradictory to policies in PPS3 regarding use of the private car and the sustainability aspirations of the LDF. To continue market development in these villages simply increases the commuter problems and increases the carbon footprint. The proposed policy avoids the main issue, discounting coalescing settlements around the sub regional centre where those closest to the Hull Boundary are in fact the most sustainable locations, with least travel time to employment, retail and leisure and have far better prospects of sustainable public transport routes according to the TRICS. This is reflected with the use of 2 mile buffer zones which appear to be arbitrary both in size and application and are not consistent with the 5 miles used in para 4.31 (see comments to Q5) or the 4 miles used in Para 4.48. We are surprised that in one statement in 6.20 the major Haltemprice settlements are referred to as accommodating relative high amounts of development and 6.21 states this is at 15%, While this concurs with table 3, that table identifies Rural Service Centres, Supporting Villages and the Countryside as providing 19% of housing. This cannot therefore be classed as relatively high development for the Haltemprice villages when they are providing the least development of all settlement types in table 3 whilst at the same time being in the most sustainable location. 6.24 could set out here the restricted use of supporting villages in particular and remove the cluster along the A63 corridor within the central area on the grounds that they do not provide services to other settlements more than 5 miles way from a LSC, are

dormitory villages with reliance on the private car, which will add to the carbon footprint and where no special case due to a remote rural location can be made.

We therefore propose that as a minimum South Cave should be removed from Policy SS8 A5 and C2 last bullet point the 2.5% housing allocation for RSCs and SVs should be reduced to 0% allocation reflecting the non strategic nature of any minor development in these villages and that windfall sites are providing local small scale housing development opportunities (for example since 2003 South Cave has brought forward 35 dwellings).

While the map at figure 10 is necessarily simplified, the flood zone 3 reaches South Cave and is not shown on the map.

**Question 19 (p120)**

Does Proposed Policy HBHM1 set an appropriate framework for achieving a suitable housing mix and meeting the needs of different households? If not, please state why.

Overall the policy with a tiered level is supported and South Cave, whether as a SV or not, requiring a mix of housing for developments over 3 units and generally identifying the elderly and first time buyers as target groups. There appears to be no mechanism however for defining what that mix should be, which appears to be a subjective discretion of development control nor how preserving this mix is to take place. We are particularly thinking of elderly bungalows for example, which upon onward sale, are extended by young families etc and become unavailable to the elderly group the housing mix originally provided for.

**Question 20 (p124)**

Does proposed policy HBHM2 set an appropriate framework for ensuring an increase in affordable housing? If not, please state why.

This is difficult to answer in that the policy is not complete and currently as framed is contradictory. In part B exception sites will be allocated in the Allocation DPD (and therefore be within a development limit of a RSC or SV), yet in part C exception sites may be adjacent to those development limits?. We are totally against any development outside the existing development limits which is reflected in the Parish survey where 88.9% of respondents did not want to see those limits extended.

**Question 21 (p126)**

Does Proposed policy HBHM3 set an appropriate framework to meet the needs of Gypsies and Travellers? If not, please state why.

A6 could be usefully augmented to include (in line with other policies e.g. SS4 A11 or SS2 H4), where; it does not detract from the character and appearance of the settlement and is appropriate to the scale of the village.

**Question 22 (p130)**

Does Policy HBHM4 set an appropriate framework for ensuring that new housing development makes the most efficient use of land? If not, please state why.

We generally agree with the principle of varying densities of Housing Development to meet the local circumstances as the ability to go below 30dph. It is important in locations such as South Cave. We have some concerns in regard to Policy C1 where the public transport corridor is fairly wide and ill defined, to then place tight specific measurements for which higher densities will be sought appears incongruous as it is not clear what is being measured. For instance just because South Cave appears to be inside the public transport corridor, there is little public transport available (or likely to be) as seen by the statistics on car usage where 77.2% use private cars to travel to work and where on average each household had 1.6 cars per dwelling and only 156 dwellings had no car (census 2001). It would be better to rephrase this to "Rail and bus interchanges within the main public transport corridors as identified in Policy SS7"

We generally support the highest possible use of PDL and would not support less than the 35% proposed and would still favour the 40% limit. The problem with having reduced targets is that it encourages developers to continue to cherry pick the best and easiest sites to develop and lower targets do not address the more difficult PDL sites. The other solution is to have an area based approach which then would account for a lower PDL target for rural areas and higher PDL target for the more built up regions i.e. the Central Area.

**Question 24 (p140)**

Does proposed policy PE2 provide a suitable framework for encouraging the growth and diversification of the rural economy? If not, please state why.

The general principle of not allocating sites for SVs is supported. We do not support para A1 which states "Is within or on the edge of a Rural Service Centre, Supporting Village or other rural settlement, etc". If supporting villages have development limits then these should be adhered to for all development. Where a village is classed as Countryside with no development limit the proposal should not increase urban sprawl or overall size of the village. A2 and A3 are supported.

**Question 26 (p149)**

Does proposed policy PE4 set an appropriate framework for:

c) considering proposals for retail development in the countryside? If not, please state why.

We would support the resisting changes of use from class A1 retail uses in rural centres to maintain the retail offer.

**Question 27 (p154)**

C) Does part D of proposed policy PE5 provide a suitable approach for considering the number of parking spaces to allow in new residential developments? If not, please state why.

We would support D1 and welcome the relaxation of parking space provision to accommodate the reality of rural car ownership requirements.

**Question 29 (p166)**

B) Do you agree with the defined Yorkshire Wolds area of high landscape value? If not, please state why.

We would support the Yorkshire Wolds high landscape definition in HQE2 although figure 20 lacks detail as to where any specific boundary lies and a detailed map should be provided.

**Question 33 (p189)**

Does proposed policy HQE6 set an appropriate approach to managing environmental hazards posed to development? If not, please state why.

The sequential test should also apply to sites which when developed will add to the pressure on built up areas within Zone 3 as in South Cave where all the identified sites will cause additional pressures along Water Lane and Church Street which suffered the worse effects of flooding in 2007. This is a view supported by the Parish Survey where 99.3% of respondents thought development should not take place where it increases the flooding risk to other homes.

It is not sufficient to limit run off to Greenfield site levels, as run off is concentrated into a single exit source whereas Greenfield will have a runoff over a wide area. Any development should proactively mitigate their effects in those existing areas at risk into which they eventually discharge. In such cases where sites are upstream of a zone 3 area then the exception test should apply, i.e. do the wider sustainability benefits to the community outweigh the flood risk?

The SHLAA criteria does not reflect this issue and again the scoring is unclear. For example in South Cave the designation of SV is dubious and not sustained by closer examination, there is no additional housing envisaged which would increase or sustain community facilities, therefore a weak policy argument for additional housing, which does not outweigh the flooding risk to those properties in Zone 3.

Policy D1.ii should be strengthened and make SuDs mandatory for Greenfield sites The application notes at 9.111 and 9.112 indicate a strong presumption but we feel this should go further.

**Question 34 (p195)**

Does proposed policy HQE7 an appropriate framework for assessing proposals for renewable energy development? If not, please state why.

Only small scale renewable energy sites should be allowed in areas of high landscape value i.e. the East Yorkshire Wolds.

<b>Question 35 (p199)</b>
Does proposed policy HQE8 set an appropriate approach to promote sustainable construction? If not, please state why?
We support the policy, however where housing developments take place with reliance on the private car for transport to work, leisure and retail, this negates this policy objective entirely.
<b>Question 36 (p202)</b>
Does proposed policy HQE9 provide a suitable framework for minerals development, within which the Joint Minerals Development Plan Document can be developed? If not, please state why?
Swinescaife Quarry Area of search on Map AOS06 of the draft Joint Minerals plan should not extend either South or North as the extended area is in an area of high landscape value, in the best grade of agricultural land, to the South into the Woodland Trust wood, the Wolds Way footpath would be detrimentally affected and the activity will be adjacent to and incompatible with the residential amenity of South Cave.
<b>Question 38 (p212)</b>
Does proposed policy SHC1 provide a suitable framework for the provision of community services and facilities? If not, please state why.
We would support the policy SHC1 but see no value in restricting the policy to LSCs and above. It is arguably more important, and has a bigger impact for small villages to reuse a redundant facility. We would request Policy C is amended to delete all reference to settlement type. Policy D should require formal pre-application consultation with the Parish Council to establish the importance of individual facilities and be given sufficient notice commensurate with the complexities of the proposals to develop solutions for their retention.
<b>Question 39 (p214)</b>
Does proposed policy SHC2 provide a suitable framework for assessing the potential loss of rural community facilities? If not, please state why.
Policy SHC2 is supported. Policy B should require formal pre-application consultation with the Parish Council to establish the importance of individual facilities and be given sufficient notice commensurate with the complexities of the proposals to develop solutions for their retention.
<b>Question 40 (p218)</b>
Does proposed policy SHC3 provide a suitable approach to the provision of infrastructure and facilities and developer contributions to support new development? If not, please state why.
This policy goes some way, however all infrastructure requirements should be in place before the development commences. The most concerns in the village are around traffic (31.9%), flooding (18.8%), Utilities (14.2%), parking (11.5%) and the school (11.1%). Historically the planning system has failed to provide the infrastructure required even after 435 dwellings have been built since 1980 and we would welcome an infrastructure delivery plan if further housing development is imposed.

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**Question 41 (p220)**

Does proposed policy SHC4 provide a suitable framework for dealing with the provision of public open space for leisure and recreation? If not, please state why.

The Policy does not address how open spaces will be provided in the RSC and SVs where the provision of open space is unlikely to be provided on site due to the small scale nature, but where often, as in South Cave, that existing open space provision is inadequate (from PPG17 1991 since revised and standards removed).

**Question 42 (p227)**

A) Is this an appropriate approach to monitoring the Core Strategy? If not, please state why.

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.

B) Are the indicators proposed appropriate? If not, please state why.

The indicators appear to be based on the policy requirement although the number of indicators appears to us to be unmanageable with the current resource 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.