

Have Your Say

ALLOCATIONS DEVELOPMENT PLAN DOCUMENT POTENTIAL SITES CONSULTATION

We would like your views on the Allocations DPD potential sites consultation. This is a chance for you to have your say on the sites we have included within the consultation, including whether you consider particular sites suitable for development or protection from development, and the uses they would be suitable for. Please clearly indicate the sites to which your responses relate. Once complete, please send the questionnaire back to us at the address below.

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The questions in this form are taken from the Allocations DPD - Potential Sites Consultation. If you need more room to answer any of the questions or to comment on additional sites please attach additional sheets, stating clearly which question you are responding to.

General Questions

Question 1
Are you aware of any more research/evidence, which could give rise to further sites for consideration within the Allocations DPD?
None. We would propose that far from allocating sites, sites should be de-allocated within the South Cave area. For example SCAV 4 and 6 are undeliverable (see attached SHLAA completed by the Parish Working Group) reliant on a ransom strip and a vision splay at Beverley Road/ Little Wold Lane outside of the ownership of the landowner and ERYC. This allocation is based on the discredited Humberside Structure Plan and Beverley Borough Local Plan, which the EIP for the JSP ¹ noted were the failed policies of rural housing provision and employment site allocations. This only produced housing and little local employment or facilities and thus greater reliance on the private car. Allocations in South Cave would continue to promote these policies as there is very little evidence that the village acts as a local service centre for lower order settlements. (see our comments on the Core Strategy) The village was found unsustainable at appeal ² where the inspector concluded that South Cave only had a very broad geographical claim to be a sustainable settlement (Para 48) and fairs less well in terms of sustainability having regard to transport factors, no large /medium food store or railway station and with one bus service that could be described as regular (Para 50). Para 51 concluded when assessed against

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the TRICS scale, 1 per hour is considerably below the bottom end of the “good” range (6-11 services per hour). It was doubtful whether (in that case) 44 homes would lead to any significant improvement. South Cave’s sustainability credentials fall short of qualifying as a location that provides a good range of local services and according to RPG12 “amongst the most accessible in the area by a range of transport modes” (Para 53). RSS12 policy YH7 maintains this policy and at 12.8 states for the Humber Sub-Region “The figures for Hull and East Riding reflect the strategy of transforming the Regional City of Hull and reversing historic dispersal to the East Riding whilst allowing appropriate levels of development to support sustainable rural communities. To allocate sites in South Cave would be contrary to Policy H7 of the JSP⁴. South Cave has 77% of people using private cars to travel to work and according to the 2001 Census, travel an average of 23 km.

¹ EiP Panel report April 2004

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,

Para 7.34 There has, however, been no market failure within the Hull housing market area as a whole. The problem is that house building is taking place on a dispersed basis within the Hull housing market area, rather than being concentrated in the SRUA as RPG and national guidance requires.

²Appeal ref APP/E2001/A/02/1097297 Westcote Farmstead, Water Lane, South Cave

³ RSS12 May 2008, para 2.57 Policy YH7 also provides a framework for existing development plan allocations to be reviewed to ensure that sites are confirmed, de-allocated or re-allocated, for the most suitable use. This will ensure that:

- The scale and location of future development supports and delivers the strategy and policies of the Plan
- Re-allocation takes place of land which is allocated in a development plan for a purpose for which there has been no interest in the past or is likely to be forthcoming unless there is a strategic basis to retain the existing allocation
- Confirmed development commitment should be accessible by a range of transport modes and maximise opportunities to achieve environmental, social, and economic benefits for local communities.

⁴ JSP 2005 Policy H7

Housing development in existing villages should meet an identified local need, particularly for affordable housing but also to support existing village services. Development should be limited in scale, with a preference given to previously-developed sites, infill plots and conversions. Development that would result in unacceptable long distance commuting will be resisted.

Question 2

Are there any other significant site considerations, not listed here or in the draft Sustainability Appraisal Site Assessment Methodology (SASAM), that we should take into account in deciding which sites to allocate in this DPD?

Due to the rural nature of the authority over a large area with a dispersed settlement structure, the link has to be made to local housing need, clearly a surfeit of sites in an area without need is counterproductive. Stage 1 should only include a RSC or SV settlement where further housing allocations are required due to identified housing need – currently not shown/proven by ERYC. Current housing needs survey indicates need of 28 units over a 5 year period. ERYC in coming to this conclusion has allocated numbers from the overall shortfall of affordable housing dependant on settlement type and not on actual local housing need of the area.

A stage 1 question should be “Is there an evidenced local need that is required to be met”.

There should be a sieving out of non-runners from bids. Although some sieving based on locational criteria has been made, it should be kept in mind that inclusion of a site in the SHLAA indicates that it is considered suitable in principle for housing (because

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the assessment of deliverability/developability includes suitability). To include non-runners will therefore present a misleading signal and may prove an embarrassment if their inclusion is subsequently argued at appeal to demonstrate that they were considered suitable in principle for housing when the SHLAA study took place (Planning Advisory Service FAQs Feb08 – FAQ15).

Practice guidance 38 states that sites allocated in existing plans for housing or with planning permission for housing will generally be suitable, although it may be necessary to assess whether circumstances have changed which would alter their suitability. RSS12 YH 4 confirms this reassessment as vital and yet no such assessment has been carried out, bids are included as previously allocated in the old saved plans.

Practice guidance 38 states the following factors should be considered to assess a site's suitability for housing, now or in the future:

policy restrictions – including, existing planning policy (i.e. JSP, housing need, the reduction in the use of the private car etc, especially with reference to appeal on Water lane¹ where South Cave has been found to be unsustainable) and corporate, or community strategy policy (see Practice Guidance para 21); see also proposed SS1. obj3 *“Enable residents to achieve a high quality of life with good access to jobs 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.”*

A **further assessment** on the current use as a village is required. i.e.

1. How reliant is the population on the private motor car for shopping, leisure and work. (i.e. in South Cave 77% of people travel to work by car and travel 23km)
2. How prevalent is car ownership in the village (i.e. In South Cave only 156 or 9.5% dwellings do not have a car whereas 50.5% have 2 or more cars (Census 2001).

This would give a score on how likely any dwellings will be reliant on the private car which should be afforded great weight. This has more weight than, for example, how far South Cave is to Melton as an employment site (see next point).

A **further Assessment** on the population socio-economic make up is required and an assessment of how far that population is from employment sites offering work in that category.

For example in South Cave 34% of the population are in managerial/professional, whereas 16.8% are in semi routine or routine occupations. Using Melton as a factory and logistics employment site (Policy SS8 B2iv) is then inappropriate in assessing travel to work and the travel matrix requires amendment to travel to “relevant” employment sites.

LDF SS1.A1 Directs new development to areas where there are services, facilities, homes and jobs, and where it can be served by sustainable modes of transport;
A4 Promoting sustainable modes of transport and well-connected places;

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A **further assessment** on the sites proximity by walking/cycling to transport interchanges both Road and Rail should be made.

LDF SS1 B1 Directs development away from areas of high flood risk; While Question 3 stage 1 answers this from the site location and is almost repeated in Question 8 the one flooding issue not addressed is the impact on existing development and in particular those areas in zone 3.

See also para 29 practice guidance; potential impacts and the environmental conditions are covered adequately although again some sites in South Cave have been included even though part would be in zone 3 and therefore not suitable.

For example South Cave has less than adequate drainage, which exits in the South West of the Village through a single egress point and coupled with water run off from the whole of the Wolds valley to the East up to Great Wold, Beverley Clump and Little Wold, regularly flooding areas, particularly down Church Street and the West end of the village.

A **further assessment** is required after question 8 which is where the drainage and run off from the site falls to an area sensitive to flooding (i.e. zone 3) then the site is scored negatively and afforded the same weight as Question 8.

¹ Appeal ref APP/E2001/A/02/1097297 Westcote Farmstead, Water Lane, South Cave

Questions relating to sites and maps

Question 3

Do you have any comments on the potential allocations shown on the plans and described in the schedule? In particular,

a. Is the potential allocation suitable for development? If so, what uses could it be developed for? If not, why is it unsuitable? Please state clearly which site you are referring to.

Please see our attached Pro forma assessment based on ERYC methodology for all sites in South Cave. We found no sites suitable for development. ERYC has released SCAV6 greenfield site without any consultation with this Parish, to which we object. This now means that all further sites fail automatically. Even where SCAV6 is re-assessed (it has a ransom strip and vision splay issues not in the ownership of the landowner or ERYC, there are no suitable sites, most falling outside the current development limit within an area of High Landscape Value, all contributing to the increased risk of flooding of a zone 3 area in West End. (88.9% of respondents to the Parish survey disagreed with building on greenfield sites outside of the development limits, 99.3% did not agree with development where it increased the flooding risk to other homes)

We would make the point generally, that as South Cave has delivered through windfall sites 35 permissions since 2003 with 13 remaining to be completed, which outstrips demand, there is therefore no need to allocate further sites.

South Cave does not need a single large site and we would argue elsewhere should not be included in SS2 SVs. A site of over 10 dwellings would impact adversely on the

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village. (And 65% of respondents to the Parish survey wanted a number of smaller sites if housing was required). The village is only required (accepting SV status) to yield an average of 5 dwellings per annum therefore all sites should be dismissed on the basis that this is currently achieved through windfall even through times of recession.

There is no allocation for open spaces within the village, especially East of the A1034

b. Are there any sites that should be a priority for development?

None, although 65% of respondents to the Parish survey thought if housing had to be accommodated then several small sites around the village were preferable to a single large site. By its nature and density such a site would become a building site over many years (i.e. SCAV7 which has been released without consultation with the Parish).

Question 4

**Are there any other sites, not considered so far within this document that should also be considered as potential allocations?
(please provide details and map as appropriate)**

None.

Question 5

Do you have any comments on the proposed primary shopping frontages, primary shopping areas or town centre boundaries as shown on the town centre inset maps?

No, South Cave is not identified for this purpose.

Question 6

Do you have any views on the proposed land to be safeguarded for transport schemes as shown on the potential sites plans?

No, South Cave is not identified for this purpose.

Sustainability Appraisal

Sustainability Appraisal Question

Are there any comments you would like to make about the Sustainability Appraisal Part II Scoping Report and Sustainability Appraisal Site Assessment Methodology Briefing Note that accompany the Potential Sites consultation?

There appears to be in table 2, a mismatch with the core strategy SS2 and within the explanatory text where the sustainability appraisal assumes only affordable housing will be built in supporting villages, which we would totally agree and support.

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The existing Housing methodology (which appears to change very little in the SASAM) around public transport and walking and cycling matrix is flawed, for example in SCAV4 and 6 the transport score fluctuates between 11 and 7 when the most that can be scored is 6? Our scores using Brough and Melton for employment and shopping (which is not realistic but is the assumption ERYC make) gives a score of 3 which excludes the walking time from the site.

The matrix for question 7 is incorrect at the summation row which reads Total score 30+, 39-35, 34-30, 29-25 and so on it should read 40+. As with the overall weightings, it is unclear how these scores have been arrived at and some are clearly weighted i.e. higher education appears less important than primary education but there is no rational or explanation behind it.

We note with interest that ERYC has adopted the 7 key services which were identified in the 2003 Social Exclusion Unit report "Making the Connections" but uses a threshold type measurement for transport and travel rather than the continuous indicators as used by the DfT Core Accessibility Indicators. Although conceptually harder to interpret than the threshold indicators, the continuous indicators give a more complete picture of accessibility as they distinguish between an area which has a service within a few minutes and one where the target population will have to travel a greater distance. The continuous indicators are therefore more sensitive to changes in accessibility. As the threshold matrix is difficult in any case there appears to be no reason why continuous indicators should not be used.

Both employment and shopping travel explanations refer to table 3 which is about walking and cycling. A list of employment sites is not given from which to measure. There needs to be consistency of measurement across the core Strategy and SASAM. It's not clear as to the parameters of what is being measured.

The scoring matrix has nothing about frequency of public transport which is the other key determinant as to whether it is likely public transport will be used. It is noted that the ability to obtain a TRICS rating of Good (6 to 10 services per hour) has not been used and is a real weakness in the travel distance methodology.

See also our comments on the core strategy which reference sustainability.

The yes/no gateway criteria is fine for excluding sites at an early stage. However there is no criterion for measuring whether a site is contrary to local policies and plans only national. This is incorrect and PAS clearly advises that when considering specific sites in accordance with SHLAA Practice Guidance 2007, Para 38 then local policies should be taken into account in the assessment.

The weighting of the individual elements is not explained and this is a fundamental flaw. It is neither transparent nor workable and the use of colours misleading. The process cannot be used in a meaningful way in providing a comparison between sites unless in a subjective way when the likelihood of less important considerations are likely to distort the decision. Further there is a mixture of numerical, Yes/No and multiple symbols (+s and -s) which appear to have some form of weighting attached to them. The whole concept should be revisited using a numerical approach with weightings for each criterion clearly explained and rationalised.

No reference on flooding impact on areas outside the site under consideration and the

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flood risk matrix as it stands is unclear and not helpful as sites are excluded at the gateway if in zone 3 so it's unclear what this is then measuring.

A number of the site specific considerations can only be answered if an application is already lodged, for example Question 9 scores reflect whether mitigation measures could be undertaken or are agreed. This can't be answered until a specific proposal is presented. The same applies to question 10, 11, 12, 13, 14, 23, 29, 31 and 32 in that to score these criteria a proposal must exist.

Q17 would be better in stage 1 as a Yes/No gateway question.

Q27 should include the generation of carbon footprint created by use of the private car. The traffic generation model by TRICS could be used to access the site.