

Relevant extracts from previous consultation and correspondence with ERYC

April 2012 Response

We are greatly disappointed in the lack of acknowledgement in our arguments for excluding South Cave from further allocated developments. The Local Authority has not given due weight to the legislation and guidance we have referenced in our submissions. We now find ourselves under a new regime of planning guidance which is most unhelpful, while it is appreciated the new planning arrangements are outside of your control, it seriously impacts on our ability to put forward cogent arguments on the communities behalf.

The further imposition of a very short round of consultation on yet another unsubstantiated change in designation and purpose of the smaller villages is unsound, and clearly indicates the lack of a robust policy framework. It is clear to us this is simply a numbers exercise with policy chosen to fit the pre-determined desired outcome and we have no faith in the outcome of the exercise.

The East Riding, despite national guidance, seems to be obsessed with continuing the failed policies of previous plans using a dispersed settlement strategy. This approach was demonstrated in the JSP when this Council ignored the inspector's recommendations regarding DS4 settlements, continued with the consultation core strategy and is again clearly replicated here. As currently written the detailed policies regarding Secondary Rural Service Centres and Hinterland villages being combined with Primary villages conflict with the stated vision and aims of the published plan and are as such unsound.

Our further observations are included below, our thoughts remain the same as set out in the December 2011 consultation response, as expressed by the community of South Cave through our own questionnaire on the subject of Housing allocations.

1. We are greatly concerned that at this late stage without any real policy foundation or evidence base, a further new category of "primary village" is suddenly announced and we cannot support this. This designation clumsily combines two previously defined settlements after they have been identified under separate criteria but then treats both as one.
2. We may accede to a designation of Hinterland Village as proposed in the December 11 further consultation, although this is very marginal and only on the basis of a restricted windfall basis only with no land allocations on the basis we describe further on in this response

3. Hinterland villages may well be a useful designation to use, to allow very limited organic growth in villages that are slightly more sustainable due to their proximity to larger settlements without specific allocations as first proposed, however to link them with the function of Secondary Rural Service Centres is a fundamental mistake and not one borne from well thought through strategic thinking. The two roles undertaken are completely different and we can find no national guidance which would indicate that the treatment should be the same. We do not find the hierarchy confusing and each has a distinctive and separate policy role. Indeed in terms of damaging the chances of house building recovery in the Regional City by allowing developers to cherry pick highly profitable allocated sites in the West Hull villages is extremely questionable. Currently developers cannot make Brownfield sites with low unit prices financially viable and are only willing to consider high unit value based on Greenfield sites.
4. There appears yet again no explanation in policy terms as to the change of designation of the newly proposed Hinterland village and Secondary Rural Service Centre to a Primary Village indeed the two types of village carry out distinctively different functions so it is inconsistent to treat all "primary" villages in the same way. This is similar to our observation to para 3.11 of the 2011 consultation which stated SRSCs do not have the same role as PRSCs.
5. As we set out in the 2011 Consultation 3.11 - Levels of 10 % or 5 dwellings are arbitrary and not justified and are simply proposed in order to reduce numbers around the most sustainable areas to develop in the major towns and Haltemprice settlements. This is purely a matter of expediency and evidence is required to support such levels in terms of local need.
6. Previously Para 3.12 of the consultation document appeared to understand that dormitory villages are not to be encouraged and is contrary to government policy objectives. We are unclear therefore in what way allowing further major allocations in the Hinterland villages, /primary villages and in particular in South Cave, which serve no purpose other than a dormitory village, furthers this policy objective. The failed dispersed policies have shown house building especially at the levels proposed, does not support existing services and facilities. If it does, then once again we ask that you kindly state the empirical evidence.
7. Revised policy 8 stated Haltemprice settlements and principle towns will be the main focus of growth, however proposed growth as set out in SS4 is only slightly more than the PRSCs, proposed Primary villages and Rural areas in percentage terms, and Haltemprice settlements will provide for less dwellings than local Service Centres. Amending settlement designations in this way does nothing to address this fundamental issue of a "main focus".
8. The principle of allocating 21% of new dwellings to rural areas and villages below Local Service Centres is a strategic allocation which conflicts with RSS12 policies P1, H2 and H3 and the JSP policy DS4 and particularly Para 5.26
9. JSP clearly indicates that settlements under D3 level are not strategic in nature, something which this policy still ignores when grouped as a whole and with further allocations in the new hinterland villages which are now to become primary villages the situation is exacerbated.

10. Revised policy B states SRSCs will provide for more limited development (85 dwellings for South Cave) to sustain and meet the needs of rural areas. As in our original submission South Cave only meets its own dormitory needs. There is little rural hinterland which is served by South Cave. The only local need is for some affordable housing. Clearly not all Primary Villages as now proposed serve rural areas and Policy B will require amendment
11. Revised policy G, in what way does 85 dwellings meet local community needs and what hinterland does South Cave further serve the "basic needs" in "more remote areas". If this is no longer the policy reason then how do 85 dwellings in an area requiring the private motor car comply with any extant policy? If South Cave is to be treated as a Hinterland village, now to be a Primary Village, and then treated the same as the previously defined Secondary Rural Service Centre the circuitous route strangely results in the same number of dwellings allocated and we appear to be merely playing with words. As we have previously indicated it is not clear what local need 85 dwellings in South Cave and the other allocations in primary villages would meet, other than attract commuting families, reliant on the private car, this is contrary to extant policy NPF Para ## and the policy objectives of the core strategy and saved JSP policies.
12. South Cave cross roads Market place/church Street/Beverley Road is 4.86km from the centre of Brough, a Local Service Centre (as per draft Town centre plans). This appears to fall within the "Hinterland Village" distance criteria, and has the required local services, however under no circumstances is travel easy between the two, even by cycle down a busy fast ex-trunk road. Other Hinterland villages are identified due to their proximity to a town, not rural service centre
13. Due to the proximity of Elloughton / Brough which is a Local Service Centre, if South Cave requires any definition, then we may be persuaded to consider South Cave as a "Hinterland village" although this newly introduced Category is by no means satisfactory nor the village's inclusion in that category clear cut.
14. What is clear cut is that South Cave is not remote, does not serve any catchment area, is heavily populated by a commuting workforce with over reliance on the private car, which commutes one the longest distances of any village in the East Riding and significant house building will only serve to increase the dormitory nature of the village contrary to national and local Policy.
15. There is no merit in defining a new category of Primary Village, the Hinterland village may have had a purpose as in Para 3.16 which has good links to the regional centre or principle town and is 5km from the centre, however there is a far weaker argument for assuming the same relationship between a Local Service Centre and a village where links are less robust. The old Secondary Rural Service Centres have a completely different policy objective and cannot simply be lumped into a single category with Hinterland Villages.
16. It would be unsound for ERYC to continue the failed local plan policies of dispersed settlement using 30 year old allocations by including South Cave as a Primary Village, which is neither remote nor serves any rural catchments area.

17. There is some argument to be had as to whether South Cave should be included in Para 3.20 and new policy SS3,B as a Hinterland village rather than a SRSC (which it is clearly not). The arguments against including it as a hinterland village from the criteria list in 3.16 are that; the car is still the only reasonable method of getting to Elloughton Brough to access services. There are some buses but only at peak and Sunday buses no longer run. Only a few selected Petuaria express buses come through South Cave. The former A63 trunk road to Elloughton Brough could not be described as a good pedestrian cycle link to Elloughton Brough. There are limited employment opportunities and Melton Park will not provide the types of employment required to be able to live in South Cave. South Cave is a long distance commuter village.
18. Small scale development restriction could be supported in Hinterland villages; however the policy was silent on multiple sites or numbers over time. This could have been easily overcome with for example a restriction on windfall sites of no more than 5 dwellings to be allowed with no subdivision of larger sites to achieve multiple small sites and no further applications be considered where permission for 10 dwellings remain uncompleted and no more than an overall windfall of 40 dwellings over the plan period to be considered.
19. The Parish prefer including only windfall as the village contribution which historically equates to the proposed 85 dwelling requirement for reasons previously given. Under current proposals to allocate 85 dwellings will mean in practice the village is likely to bring forward 170 dwellings over the plan period.
20. Even if this approach is rejected, Government policy only precludes the inclusion of windfall sites in allocation for the first 10 years. ERYC should therefore only allocate for 10 years of the plan period as some villages, certainly South Cave, have historically continued to provide windfall sites at a substantial rate, even through the recent recession. Windfall allowance should be included for year 11 onward when calculating the allocation otherwise even more over development will occur. In this scenario (which we don't support but is an alternative approach from the Council's perspective, only 50 dwellings should be allocated with the remaining 7 years to 2028 being made up from windfall (South Cave achieves 5 dwellings per year on average from the 90's)

East Riding of Yorkshire Core Strategy – Further Consultation Questionnaire

We would like your views on the Core Strategy Further Consultation. This is your chance to have your say on the policies and approach it proposes. The consultation period runs from **Monday 31st October until Monday 19th December 2011**

Question 2

Do you agree with the amended approach to the Settlement Network as set out in Revised Policy SS2?

3) 3.6 states most SRSC do not have significant constraints. Parts of South Cave are in Flood zone 3 and all surface water drains through the area to a constrained drain under the A63. All development will impact on this situation. The Council's infrastructure study para 2.3 ii) states that; South Cave is considered to be at capacity and likely to require investment/improvements if it is not possible to achieve Greenfield run-off rates. Potential costs of improving drainage could be in the region of £1m. The Study admits that the surface water drainage risk that presents a potential constraint to new development in these settlements is not fully understood. GP's are at capacity and again the study states at section 4.2 (page 51) NHSEY is aware of potential issues with GP capacity in South Cave and Brough. and shows a requirement currently for between 4.3 and 4.6 full time GP's (the report, mistakenly not accounting for branches, doesn't state existing number of FTE GPs) Pressures of new housing in Brough will exacerbate the situation in South Cave. The study in section 6.2 (page 77) indicates an existing small deficit in provision of indoor courts in South Cave which by 2026 will require investment of £496,743

4) The
failed dispersed polices have shown house building does not support existing services and facilities. If it does, then please state the empirical evidence.

5) 3.11 - Levels of 10 % or 5 dwellings are not justified and are simply proposed as is the 20% or 10 dwellings in 3.10 for PRSCs. Evidence is required to support such "non- strategic" levels.

6) 3.12 appears to understand that dormitory villages are not to be encouraged and is contrary to government policy objectives. We are unclear therefore in what way allowing further development in South Cave, which serves no purpose other than a dormitory village, furthers this policy objective

7) Revised policy B states Haltemprice settlements and principle towns will be the main focus of growth, however proposed growth as set out in SS4 is only slightly more than the PRSC, SRSC and Rural areas in percentage terms, and Haltemprice settlements will provide for less dwellings than local service centres in what way does this constitute a "main focus"

11) Revised policy H Percentages and dwellings per annum are arbitrary (but at least the issue of overdevelopment is recognised however the development level is too high). JSP clearly indicates that settlements under D3 level are not strategic in nature, something which this policy still ignores.

12) As in your alternative approach Option A where you state that it is not clear what need the proposed urban extensions would seek to meet, it is not clear what need 85 dwellings in South Cave would meet, other than attract commuting families, reliant on the private car, this is contrary to extant policy and the policy objectives of the core strategy.

13) It would be unsound for ERYC to continue the failed local plan policies of dispersed settlement using 30 year old allocations by including South Cave as a SRSC, which is neither remote nor serves any rural catchments area.

15) What is clear cut is that South Cave is not remote, does not serve any catchment area, is heavily populated by a commuting workforce with over reliance on the private car, which commutes one the longest distances of any village in the East Riding and significant house building will only serve to increase the dormitory nature of the village contrary to national and local Policy.

Question 3

Do you agree with the amended approach to development in Hinterland Villages, Rural Villages and the Countryside as set out in Revised Policy SS3?

2) We are worried that at this late stage with no real policy foundation, a new category of "hinterland village" is suddenly announced.

3) There may indeed be some merit in defining a new category of village as in para 3.16 which has good links to the regional centre or principle town and is 5km from the centre, however there is a far weaker argument for assuming the same relationship between a Local Service Centre and a village where links are less robust.

5) There is some argument to be had as to whether South Cave should be included in para 3.20 and new policy SS3,B as a Hinterland village rather than a SRSC (which it is clearly not). The arguments against including it as a hinterland village from the criteria list in 3.16 are that; the car is still the only reasonable method of getting to Elloughton Brough to access services. There are some buses but only at peak and Sunday buses no longer run. The former A63 road to Elloughton Brough could not be described as a good pedestrian cycle link to Elloughton Brough. There is limited employment opportunities and Melton Park will not provide the types of employment required to be able to live in South Cave. South Cave is a long distance commuter village.

6) Small scale development restriction would be supported in Hinterland villages, however the policy is silent on multiple sites or numbers over time. Reference to ensure that the overall spatial strategy is supported is fairly broad and unconvincing.

7) We support the proposed policy SS3. C to involve the Parish Councils in any allocations in these villages.

Question 4

Do you agree with the level and distribution of housing set out in Revised Policy SS4? If not, please state why.

Generally no

- a) We agree that significant additional housing growth with the Hull Housing Market are is not appropriate as set out in paras 4.7, 4.13. South Cave is within the Hull TTWA. It is therefore surprising that the Core Strategy still attempts to increase housing by 10% in South Cave (and other SRSCs) in an attempt to promote the dispersed housing strategy of the out of date Beverley Borough Plan. We do not support this proposal
- b) The Housing Needs Survey and the Strategic Housing Market Assessment treats Beverley and the central sub area as one, however Beverley being by far the largest conurbation skews the results and the area is so large as to become meaningless. Needs in South Cave cannot possibly be addressed by provision in Beverley let alone Bransburton or Keyingham or vice versa. Any building in the SRSC within the Central Area will only serve to promote the village a commuting dormitory village and in South Cave's case, reliant on the private motor car.
- d) No evidence is provided for a 15% discount rate on existing planning permissions.
- e) No evidence is provided for the Percentage breakdown for settlement types in table 2
- f) As in revised policy SS4 A Rural areas are still providing 21% of new dwellings with LSC (by definition in the rural area) providing a further 21.5%. 42.5% Rural development does not appear to be in keeping with the stated aims of focussing development in Haltemprice settlements and Principle towns as set out in revised policy SS2 B. Proposed growth for the Haltemprice villages as set out in SS4 is less than the PRSC, SRSC and Rural areas in percentage terms, and will provide for less dwellings than local service centres. In what way does this constitute a "main focus" We do not support this proposal
- g) Government policy precludes the inclusion of windfall sites in allocation for the first 10 years but why has ERYC allocated all years where in some villages i.e. South Cave, have historically continued to provide windfall sites at a substantial rate and this should be included for year 11 onward when calculating the allocation otherwise even more over development will occur. In this senario (which we don't support but is an alternative approach from the COuncil's perspective) only 50 dwellings should be allocated with the remaining 7 years to 2028 being made up from windfall (South Cave achieves 5 dwellings per year on average from the 90's)
- h) The principle of allocating 21% of new dwellings to rural areas and villages below Local Serve centre is a strategic allocation which conflicts with RSS12 policies P1, H2 and H3 and the JSP ploicy DS4 and particularly para 5.26

Question 6

Does Revised Policy HBHM2 provide an appropriate framework for providing affordable housing? If not, please state why.

- a) We agree with A) in that rural areas above 3 dwellings will provide affordable housing. A1 is too weak "unacceptable" is unenforceable and it would be better to show through development appraisals the level is "uneconomic" taking into account the average level of developer profit prevalent at the time. Our preference however is that there is no choice but to provide the affordable housing otherwise it is unlikely to materialise as the approach is similar to existing arrangements.
- b) We do not agree with A2, no offsite provision should be allowed unless it is provided in the settlement and provision should be built prior to the market housing being occupied.
- c) We do not agree with B) in allocating land outside of the development limits. The policy needs to be clear about the relationship between market and affordable allocations, They should not be additional i.e in South Cave the proposed 85 dwellings should be a mixture of market and affordable housing allocation, not 85 market houses plus additional affordable allocations. This will be strongly resisted.
- d) Policy B2 is supported but requires clarity over "local need", in our view this would be the needs of the parish or village that has been evidenced (not inferred) from research. It should not include the wider strategic needs of the East Riding or sub-area as clearly provision in Beverley or Hedon will not address needs in South Cave or vice versa.
- f) We support policy C but would contend that evidence of local needs would override the Strategic Housing Market Assessment.

20th January 2011 Response

As we have noted in Para. 3.3 of our letter dated 22nd November 2010, SHLAAA PG para.38 purports that - *sites allocated in existing plans may be subject to circumstances which have changed and which may alter their suitability.*

22nd November 2010 Response

Response to the release of Greenfield site SCAV 16 – December 2009 Cabinet decision

2. Inclusion of the Local Community in assessments

- 2.1. We refer to PPS3¹ the CLG Strategic Housing Land Availability Assessments Practice Guidance July 2007² where partnership working is required of Local Authorities both together and with key stakeholders and note your entry in both the 2009 and 2010 reports at para. 2.3 around membership of the assessment group³.

² CLG Strategic Housing Land Availability Assessments Practice Guidance July 2007 para 11 specifically states that "Housing market partnerships should include key stakeholders such as house builders, social landlords, local property agents, local communities and other agencies". Para 12 states "Key stakeholders should be involved at the outset of the Assessment, so that they can help shape the approach to be taken" and "Key stakeholders should also be involved in updating the Assessment from time to time".

Strategic Housing Land Availability Assessments Practice Guidance; Figure 2: "Strategic Housing Land Availability Assessment process checklist - The survey and Assessment should involve key stakeholders including house builders, social landlords, local property agents and local communities".

³Strategic Housing Land Availability Assessment Report 2009 and 2010 para 2.3: that the core group consisted of; Forward planning officers from Hull City Council who are involved in the production of its SHLAA, 2 Professionals representing national house builders, 2 Professionals representing small, local house builders; An officer representing Gateway, the Housing Market Renewal Pathfinder for Hull and East Yorkshire; A professional representing housing agencies; A wider group (unspecified) for consultation is apparently in existence of which notable members of the wider working group include; the Environment Agency; the Homes Builders Federation and The Highways Agency.

- 2.2. The ERYC Statement of Community Involvement adopted March 2007 recognises such community involvement⁴ as key and identifies parishes in particular as bodies to be consulted.
- 2.3. The Parish have not been informed of this core group or given the opportunity to have any input into this group, nor was it notified of these impending reports or decisions⁵ nor were comments requested on an issue which is contrary to existing National, Regional and Local Policy and the emerging LDF policy.
- 2.4. You will be aware that Planning Inspectors are already amending the weight afforded to the local community wishes at Inquiries on Local Area Action Plans and we would like to hear how you intend to rectify this fault in the process and how you intend to included the Parish both in a review of the decision and in the future.

3. The SHLAA and release of Greenfield land

- 3.1. Our understanding of your report is that you are carrying out a SHLAA, then assessing the supply pipeline in the Housing position statement and then lastly assessing the Greenfield allocated sites for release to meet that supply shortfall. We address the SHLAA first.
- 3.2. Guidance⁶ strongly recommends the use of the standard methodology. ERYC has used a modified version⁷ of the Housing Site Assessment Methodology May 2007. To our knowledge, ERYC has not considered which key stakeholders should be included in accordance with para. 19 of the guidance and consulted the communities on this matter. This simplified form of the SHLAA has inaccuracies and anomalies. For example; it has not