

Draft East Riding Local Plan Update (May 2021) Consultation

Your contact details

Please provide the following details (as applicable) so that we can contact you if required. Please provide an email address wherever possible as email is our preferred method of contact.

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Are you an agent acting on behalf of a client?

No

Draft Local Plan Update Documents for Comment

Below is a link to the Draft Local Plan Update (May 2021) consultation document library. We recommend you open this document library in a separate tab and refer to the relevant documents when drafting your comments. The options listed below relate to the documents set out in the library: Draft Local Plan Update (May 2021):

<https://www.eastriding.gov.uk/planning-permission-and-building-control/planning-policy-and-the-local-plan/local-plan-update/draft-local-plan-update-consultation/#Where-can-I-view-the-Document-Library> The following documents are available for comment: Please choose all the documents you wish to comment on by selecting the options below.

Draft Strategy Document Update (May 2021)

Draft Strategy Document Update (May 2021)

Which part (or parts) of the Draft Strategy Document Update (May 2021) are you commenting on: Please tick all parts that you wish to comment on

Consultation Question 1: Place Statements

Consultation Question 3 : Addressing Climate Change

Consultation Question 10: Delivering employment land

Consultation Question 12: Connecting People and Places

Consultation Question 27: Promoting a high quality landscape

Consultation Question 30: Strengthening blue/green infrastructure

Consultation Question 31: Managing environmental hazards

Consultation Question 32: Providing infrastructure and facilities

Consultation Question 33: Community Infrastructure Levy

Consultation Question 35: Providing public open space for leisure and recreation

Consultation Question 39: Delivering growth through a Sub Area Approach

Draft Strategy Document Update (May 2021) - Consultation Question 1: Place Statements

Do you support the proposed changes to this section of the adopted Local Plan? Please provide justification with your comment(s). Please comment in the box below. If your comments exceed the limit on the comment box, please upload additional comments in an attachment at the end of the survey.

No

Under Elloughton cum Brough it states 'The industrial estate at Melton will have also continued to develop as a strategically important employment site, taking advantage of its prime position along the important A63/M62 East-West Multi-Modal Transport Corridor.'

However the Melton Industrial Estate will be full well before 2039 if it remains allocated for B8 developments, delivering low employment numbers.

Within the Spatial Strategy Plan point 14 states 'Support a wide portfolio of energy infrastructure and businesses, and maximise the potential of renewable and low carbon energy generation whilst minimising adverse impacts, including any cumulative landscape and visual effects'

This should also include minimising the health impacts from the associated increased traffic generation.

Point 17 states 'Recognise, protect and enhance the international, national and local importance of the East Riding's natural environment and biodiversity, including nature designations of all levels, Priority Habitats and Species, high quality landscapes, such as the Yorkshire Wolds, networks of green infrastructure and supporting opportunities for appropriate recreation.'

This should be amended to also include the Wolds Way.

Point 20 states 'Support the vitality of settlements by seeking to protect and/or enhance community facilities and services, including education, health care, recreation, cultural and sports facilities.'

This should be amended to also include maintaining existing Open Space.

Draft Strategy Document Update (May 2021) - Consultation Question 3: Addressing Climate Change

Do you support the proposed changes to this section of the adopted Local Plan? Please provide justification with your comment(s). Please comment in the box below. If your comments exceed the limit on the comment box, please upload additional comments in an attachment at the end of the survey.

No, because despite agreeing a Climate Change Emergency, the strategy is short on objective based reduction in CO2 etc. and concentrates on the ultimate impacts such as flooding.

Policy S2 states ' Addressing Climate Change Development proposals will be supported where they contribute to a reduction in greenhouse gas emissions and incorporate adaptation to the expected impacts of climate change. This will be accomplished by:

A. Directing most new development to areas where there are services, facilities, homes and jobs, which reduces the need to travel and where it can be served more easily by sustainable modes of transport '

New development should also take account and be compatible with levels of education demanded otherwise travel will be increased.

Impacts on Health from NOx and particulates must be taken into account and the increased traffic generation from already approved development. The Resulting pollution along the M62/A63 must be actively monitored and managed eg by targeting sites for increased tree planting.

Draft Strategy Document Update (May 2021) - Consultation Question 10: Delivering employment land

Do you support the proposed changes to this section of the adopted Local Plan? Please provide justification with your comment(s). Please comment in the box below. If your comments exceed the limit on the comment box, please upload additional comments in an attachment at the end of the survey.

The strategy for delivery of industrial development land is flawed.

The need to extend the Humber Bridgehead site is identified with land to the Southwest of it now allocated, but Melton West is nearer to residents in North Ferriby, Melton and Welton for sustainable transport.

Lowly paid warehousing jobs on Melon West are not compatible with the adjacent housing costs and will result in employees being bussed in from Hull or wider afield. Therefore Melton West's designation for B8 employment should be reversed to the previous B1, B2 classification.

According to the figures given and current application and development in process, approx. 25% of the 2020 – 2039 178 ha employment land requirement is already under consideration for MELT E in Year 0 of the plan, from which the East Riding will be lucky to benefit from 1000 new full time jobs (which will be lowly paid as above and certainly not compatible with neighbouring education aspirations).

Paragraph 36.3 of the Draft Allocations Document states 'Melton is identified in the Draft Strategy Document Update (2021) as a Key Employment Site. In total, over 62 hectares of land is allocated for employment uses at Melton, the vast majority of which has planning permission'

This is too high a % for as part of the approx. 10,000 job aspirations indicated in the Employment Land Review for the period to 2039

The statement To ensure that the potential of the site is maximised, the majority of development must be within the B2 and B8 use classes, is totally flawed in respect to B8 as the standard of 1 job per 81 m2 will not be achieved.

The statement ' In addition, there are bus services providing connections to Hull City Centre, North Cave, South Cave, Swanland, Elloughton-cum-Brough, North Ferriby and Hessle' is not correct.

Draft Strategy Document Update (May 2021) - Consultation Question 12: Connecting People and Places

Do you support the proposed changes to this section of the adopted Local Plan? Please provide justification with your comment(s). Please comment in the box below. If your comments exceed the limit on the comment box, please upload additional comments in an attachment at the end of the survey.

No

Policy S8 states ': Connecting People and Places

E. Roadside facilities and parking essential to support the safety and welfare of motorists and lorry drivers will be supported, where they are of an appropriate scale, meet an identified need, and can be accessed safely'

The word 'supported' in the above statement must be changed to 'conditioned'

Similarly Paragraph 5.56 states 'Roadside facilities will be supported where they are necessary and provide for basic needs such as fuel, food, drink, and parking, which are essential to support the safety and welfare of motorists and lorry drivers. The scale and nature of roadside facilities would need to be appropriate to their location, safely accessible and, where possible, located within a settlement.'

The wording of the final sentence above needs to be amended. For lorry drivers the roadside facilities must be local to and at the cost of the industrial developer and NOT within the settlement/villages.

Draft Strategy Document Update (May 2021) - Consultation Question 27: Promoting a high quality landscape

Do you support the proposed changes to this section of the adopted Local Plan? Please provide justification with your comment(s). Please comment in the box below. If your comments exceed the limit on the comment box, please upload additional comments in an attachment at the end of the survey.

The definition of the high quality landscape should include that part of the Wolds that extends to the bank of the Humber. In particular it should extend to include the Wolds Way from its starting point on the bank of the River Humber. The suggested updated wording is shown below in capitals.

Policy ENV2: Promoting a high quality landscape

B. Proposals should protect, enhance and be compatible with the existing landscape character as described in the East Riding Landscape Character Assessment, in particular, within the following Important Landscape Areas as shown on the Draft Policies Map Update:

1. The Yorkshire Wolds AND THE WOLDS WAY with special attention to ensuring developments are of an appropriately high quality and will not adversely affect the historic and special character, appearance or conservation value

Draft Strategy Document Update (May 2021) - Consultation Question 30: Strengthening blue/green infrastructure

Do you support the proposed changes to this section of the adopted Local Plan? Please provide justification with your comment(s). Please comment in the box below. If your comments exceed the limit on the comment box, please upload additional comments in an attachment at the end of the survey.

No

The Yorkshire Wolds and the whole of The Wolds Way should be included into Policy ENV5.

Land that is already held as Open Space should be clearly identified within the plan and protected for biodiversity from light, noise and air pollution.

Draft Strategy Document Update (May 2021) - Consultation Question 31: Managing environmental hazards

Do you support the proposed changes to this section of the adopted Local Plan? Please provide justification with your comment(s). Please comment in the box below. If your comments exceed the limit on the comment box, please upload additional comments in an attachment at the end of the survey.

No

Air Pollution (NOx and Particulates) and Light Pollution causing sleep deprivation must be specified and included

Draft Strategy Document Update (May 2021) - Consultation Question 32: Providing infrastructure and facilities

Do you support the proposed changes to supporting new and improved infrastructure facilities set out in this section of the adopted Local Plan? Please provide justification with your comment(s). Please comment in the box below. If your comments exceed the limit on the comment box, please upload additional comments in an attachment at the end of the survey.

No – the current scheme is too restrictive and does not allow the correct level of input to the local community (e.g. footpath requested by both Swanland and North Ferriby PC)

Draft Strategy Document Update (May 2021) - Consultation Question 33: Community Infrastructure Levy

Do you support the proposal to continue to seek contributions to infrastructure under the current Local Plan and not adopt a Community Infrastructure Levy charge at this time? Please provide justification with your comment(s). Please comment in the box below. If your comments exceed the limit on the comment box, please upload additional comments in an attachment at the end of the survey.

Yes agree with principal to not adopt CIL but as with Q32 investment should be locally driven

But Policy C1 below is too weak to deliver this and suggested additional wording is included in capitals.

Policy C1: Providing infrastructure and facilities

A. Proposals for new and/or improved infrastructure and facilities will be supported where they enhance the quality and range of services and facilities or facilitate delivery of new development needs.

B. New development will be supported ONLY where it is adequately serviced by infrastructure and facilities. Where necessary, the phasing of new development will be linked to the delivery of new or improved infrastructure and facilities. EG OVERNIGHT LORRY PARKS FOR DISTRIBUTION CENTRES

C. Subject to economic viability (WHO ASSESSES ECONOMIC VIABILITY AND HOW ARE DECISIONS SCRUTINISED), developer contributions will be REQUIRED from new development to:

1. Meet the need for new and/or improved infrastructure and facilities; and
2. Mitigate its impact on the wider environment and the community

Draft Strategy Document Update (May 2021) - Consultation Question 35: Providing public open space for leisure and recreation

Do you support the proposed changes to this section of the adopted Local Plan? Please provide justification with your comment(s). Please comment in the box below. If your comments exceed the limit on the comment box, please upload additional comments in an attachment at the end of the survey.

The resulting proposed Local Plan illustrates that this change is a flawed.

The 2016 Local Plan and the Playing Pitch Strategy identified a need for additional recreational Space in North Ferriby (to the South of Fer B and adjacent to existing overused shared compacted playing fields) This additional sports area has been removed from the proposed plan so the Commuted Sums Team is demonstrably not meeting the Local needs and the decision on Commuted sums should remain to be led by the Parish Councils compatible with the funding generation.

Further, Open Space legally defined as Grassland in a lease registered with the Registry Office to the West of the Long Plantation has mistakenly in the Employment Land Review 2019 and similar Economic Development publications been classed as Employment land which legal advice confirms is not appropriate and NPPF confirms Open Space cannot be built on.

North Ferriby Parish Council requests that the strategy is changed.

Draft Strategy Document Update (May 2021) - Consultation Question 39: Delivering growth through a Sub Area Approach

Do you support the other proposed changes to this section of the adopted Local Plan? Please provide justification with your comment(s). Please comment in the box below. If your comments exceed the limit on the comment box, please upload additional comments in an attachment at the end of the survey.

No

For Beverley and Central sub area comments submitted for paragraph 10.17. Melton West is more appropriate than the new HES-K for B1 and B2 investment, being closer to residents and more sustainable transport. Failure to consider this will result in lower job/area for Melton West.

The following comments are submitted for Policy A1: Beverley and Central sub area

'B. Economy

2 III. Melton West; predominantly for manufacturing, storage, and distribution activities which make use of the site's high quality multi-modal transport links as before'

Storage has a low output in jobs for the valuable industrial area.

Remuneration for storage employment is at lower end of pay scales and not compatible with the residential housing market surrounding Melton West i.e. North Ferriby, Melton, Welton, Swanland, West Hessle and Brough meaning employees will be travelling from Hull and further afield, with resulting increased pollution and with the employees reduced take home spend not necessarily being in the East Riding, so concerns are raised about the deliverability of the above policy.

'C. Environment '

Despite declaring a Climate Change Emergency:

No mention of CO₂, NO_x or particulate levels and objectives compatible with WHO targets. Pollution levels will be increased by inappropriate development, potentially to harmful health levels adjacent to major transport routes.

No mention of noise and light pollution, both again impacting health from sleep deprivation.

'D. Community and Infrastructure

3. Support the provision of additional infrastructure, including

IV. additional secondary school pupil capacity within the Hessle and South Hunsley school areas;

V. additional post-16 education capacity within the Hessle, South Hunsley and Wolfreton school areas;'

All of the existing secondary schools and post 16 capacity are in the control of Academies, where ERYC have little control on their expansion, so concerns are raised about the deliverability of the above policy.