

Mr Malcolm Wells
Programme Officer
Room GG9
County Hall
Beverley
HU17 9BA

Dear Mr Wells

East Riding Local Plan Strategy Document and Allocations Document Modifications Consultation Representations Form (March 2015)

Continuation sheet – AM219 Swanland

1. Thank you for the opportunity to comment on the proposed modification AM219. We are Ward Councillors for South Hunsley which includes the Primary Villages of Swanland and North Ferriby and we are also parish councillors in the neighbouring parishes of North Ferriby and Welton.

2. It is our opinion that the draft East Riding Local Plan that was the subject of the examination in public in November 2014 met all tests of soundness. However, the Modification AM219 requires that Swanland finds land for 165 dwellings rather than the 85 originally proposed. This is due to the removal of the 'cap' on Rural Service Centres and Primary Villages set out in Policy S5 of the Strategy Document. We do not consider that the amendment is positively prepared or consistent with national policy.

3. In applying the 'cap' of 85 dwellings on Primary Villages, forward planning officers have sought a) to acknowledge the role of Primary Villages in meeting future housing demand whilst b) ensuring that communities are not overwhelmed with more dwellings than local infrastructure can cope with. An arbitrary 10% figure can be imposed on communities centrally, without the need for planning officers to spend time in preparing a plan, consulting widely with communities and stakeholders, and incurring considerable cost in the meantime. We consider the practice of imposing 10% additional dwellings in all Primary Villages, without taking into account the individual characteristics of communities, to be wholly unsound. Capping the number of housing at 85 is no more of a restriction than capping it at the arbitrary 10%.

4. We are concerned that there is no consideration of the cumulative impact of applying a 10% requirement on all Primary Villages when there may be just one Primary Village in a given area or several. We are concerned that the impact of a 10% increase in Swanland when added to the 10% increase in North Ferriby increases the proposed new housing stock by 325. In the neighbouring ward, there is the Primary Village of South Cave which is also having its allocation increased from 85 to 160, making an increase of 485. All three of these villages feed into the catchment area of South Hunsley School, together with the Rural Service Centre of Elloughton-cum-Brough, which in itself is required to have 1,000 new homes. The cumulative impact of the demands for schools places from 1,485 new homes cannot be dismissed lightly on a popular, over-subscribed, Academy such as South Hunsley School. The Academy and Free School programme of the Coalition Government removes the ability of local authorities to amend catchment areas. Even if agreement could be found for an amendment to the catchment area, the nearest alternative secondary school to Swanland with a safe walking route is more than three miles away and there would be a resulting increase in the Home to School Transport budget for the LA, plus an impact on the environment and on CO2

emissions. In short, the amendment is not a sustainable proposal. There are many secondary schools in the East Riding that have surplus places and where additional housing could help to increase their viability in the future. It is our opinion that it is not in the best interests of the East Riding as a whole to increase the amount of housing in the Primary Villages of Swanland, North Ferriby and South Cave and that forward planning officers have sought to minimise some of this impact whilst ensuring that all communities play their part.

5. We are of the opinion that an increase to 10% in the Primary Villages is damaging to the principles contained in the Strategy Document. The main principle is around the need to regenerate our city, Kingston upon Hull. Primary Villages surrounding the City and which are commuter villages include Swanland, North Ferriby, South Cave and Preston, all of which are subject to amendment as a consequence of changes to Policy S5. Increasing the number of new homes in these popular villages will further divert new development from the City as well as from East Riding's Rural Service Centres.

6. Finally we respectfully remind you that there are two planning appeals pending for Melton Fields in the neighbouring parish of Welton. These appeals are for up to 510 new homes. We would not like to see decisions on the East Riding Local Plan taken in isolation to the outcome of the two appeals. An additional 510 homes, plus the potential 1,485 referred to in para 4, is simply unacceptable for our communities.

We hope that you will take our views into account when considering the outcome of the consultation exercise.

Yours sincerely

Cllr Julie Abraham
South Hunsley Ward

Cllr Vanessa Walker
South Hunsley Ward