

**IN THE MATTER OF AN EXAMINATION IN PUBLIC**

**THE EAST RIDING LOCAL PLAN UPDATE 2020 – 2039**

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**OPENING STATEMENT ON BEHALF OF  
THE EAST RIDING OF YORKSHIRE COUNCIL**

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**I. INTRODUCTION**

1. The East Riding of Yorkshire Council (“**the Council**”) has been progressing the Local Plan Update since 2017 and the opening of this Examination in Public is the latest chapter in that plan-making process.
2. There are two component parts to the Local Plan Update: first, the update to the Local Plan Strategy Document (“**LPSD**”); and secondly, the update to the Local Plan Allocations Document (“**LPAD**”). Taken together, these documents will lie at the heart of the development plan for the East Riding, as an evolution of the existing planned position. The Local Plan Update builds on the existing strategy and updates it to deliver a positive vision for future development in this area.
3. The Council welcomes all of the participants to this Examination and looks forward to progressing the Local Plan Update through this important process. To set the scene, this Opening addresses the context to the Local Plan Update and outlines the Council’s position on some of the principal issues that will be considered.

**II. THE EAST RIDING - THE CONTEXT FOR THE LOCAL PLAN UPDATE**

4. The East Riding is one of the largest local authority areas in the country in terms of population and area, covering over 930 square miles. Within this area, the East Riding is a diverse place: it is bounded to the east by the North Sea, where the Holderness coastline stretches from the Humber Estuary to Flamborough Head, spanning the seaside resorts of Bridlington, Hornsea and Witherssea. This is one of the fastest eroding coastlines in northern Europe and contains areas designated as a heritage coast. Inland, the Yorkshire Wolds are rolling hills curving north from near Hessle and spreading out through the East Riding. The Wolds are a candidate for designation as an area of outstanding natural beauty. This landscape beauty is complemented by

a variety of important and sensitive habitats, from the ancient flood meadows of the Lower Derwent Valley to the chalk grasslands of the Wolds.

5. Within this landscape the population of the East Riding is dispersed in more than 300 individual settlements, in an essentially rural setting. The principal settlements are the Major Haltemprice Settlements which lie close to Hull, in the southern extremities of the East Riding; elsewhere the Principal Towns of Bridlington, Driffield, Beverley and Goole are distributed across the area. Together with the (smaller) towns, these locations are the principal centres for development in the East Riding. Within the East Riding's settlements there are more conservation areas than in any other local authority in the country.
6. As this very brief – and inevitably incomplete – survey shows, the diversity of the East Riding gives the area its rich character and quality. The diversity of the East Riding also gives rise to a number of constraints and opportunities. Population growth, in particular net migration from Hull, is projected to continue, driven by the attractive and desirable nature of the area's settlements and landscapes. This growth presents clear opportunities, in particular for economic prosperity. However, there are also challenges, for example the pressure for development in rural areas, the synergies with development in Hull, the need to ensure that development is delivered sustainably within such a large area and the need to accommodate development appropriately in areas of constraint, particularly areas prone to flooding, erosion or where sensitive habitats and landscapes require protection. All of these factors form the context for the planning judgments that the Council has made in the course of preparing the Local Plan Update.

### **III. THE LOCAL PLAN UPDATE**

7. The extant LPSD and LPAD were adopted in 2016, covering a plan period of 2012 - 2029. These are development plan documents of a relatively young vintage which were produced in the context of, and examined against, the first iteration of the NPPF. Accordingly, the extant versions of both documents have formed a strong and robust basis for the consideration of future development, through the remainder of the plan period to 2029 and beyond to the end of the new plan period in 2039. Nevertheless, the Council recognises the importance of keeping the development plan up to date. Accordingly, the Council is now promoting the Local Plan Update.

8. Following an initial sustainability appraisal scoping exercise in 2017, the Council published an issues and options document in November 2018. At that stage, the Council assessed the broad scope of updates required, whether by changes to national policy, matters identified as requiring review at the Examination in Public in 2014/15 or through the Council's own monitoring.
9. The Council's conclusion at this early stage, which has held good through the plan-making process to today, is that neither the adopted strategy nor allocations documents required a radical overhaul. The fundamental principles and approaches of these documents hold good, but evolution and updating is required so as to account for some specific changes in circumstances, as well as to provide a positive framework for development in the East Riding over an extended period to 2039. The Council has followed this approach through the subsequent plan making stages, in particular the iterative approach to the sustainability appraisal and subsequent consultation on the draft documents that are to be considered at this Examination.
10. The vision of the Local Plan Update – as explained in the LPSD – is to ensure that:

*'By 2039, the East Riding will be characterised by economically prosperous, vibrant and distinctive urban and rural communities in which residents and visitors can enjoy a high quality of life and healthy lifestyles, businesses can thrive and the natural environment can flourish. The economy will have grown. The varied towns and villages, the rich and diverse landscapes, historic environment, countryside, coastal areas and habitats that give the East Riding such character, will continue to be valued by residents and visitors alike. Growth and new development will have been delivered in a sustainable manner, making the most efficient use of land, buildings, resources and infrastructure. Investment in infrastructure will have taken place as required to support this growth, benefiting both new and existing residents. Overall, development will have ensured that people are connected to housing, services, facilities, a range of sustainable and active transport modes and economic opportunities to meet their everyday needs, and will have complemented and supported regeneration initiatives underway in both the East Riding and City of Hull.'*
11. That vision has provided the strategic direction for the policies in the Local Plan Update that we will be considering in this Examination.

#### **IV. THE SPATIAL STRATEGY**

12. A robust spatial strategy is critical to ensuring that the right level of development is directed to the right place. Areas of opportunity and restriction must be identified and balanced. The settlement network is the mechanism at the heart of the spatial strategy.
13. The Council considered both a continuation of the currently adopted spatial strategy (subject to revision where appropriate), as well as more fundamental amendments, including new settlement(s) and a more flexible approach to designated villages.
14. The Council has carried forward the adopted settlement network with appropriate revisions, reflecting the successful framework that this has provided to date, as well as the continuing need to direct development to the most sustainable locations within the East Riding.

#### **V. THE SCALE AND DISTRIBUTION OF RESIDENTIAL DEVELOPMENT**

15. The Council considered four different options for the scale of future residential development in the East Riding. The Council's chosen housing requirement of 1,100 dwellings per annum ("dpa") is based on an uplift from the local housing need figure (calculated in accordance with the standard method) of 909 dpa. This uplift is justified by (1) the need to promote the delivery of additional affordable housing (within the constraints of economic viability); and (2) the track record of housebuilding within the East Riding which demonstrates that this uplift is achievable. A higher housing requirement has also been assessed, but has been discounted given weighty social and environmental concerns that were identified, as well as concerns about the impact of development at that level on the relationship with Hull.
16. The distribution of this amount of residential development is guided by the settlement network. At the top of the settlement network, the Major Haltemprice Settlements form a significant urban/suburban centre together with Hull. These settlements benefit from excellent public transport links and are close to regionally important services and facilities. The Principal Towns and Towns sit below in the next two tiers. The majority of the planned residential development – over 80% - is to be directed to these top three tiers of the settlement network as the most sustainable locations in the East Riding.

17. Outside of these upper tiers, around 15% of the planned residential development is directed to the Rural Service Centres and Primary Villages. Residential development in these tiers is important to maintain the viability of local hubs in rural areas, but this development cannot be unconstrained. Rather, the Council must balance the potential for development in all the tiers of the settlement network with the need to protect the countryside and to respond to other environmental constraints. This balancing exercise has been the product of detailed, fine grain, analysis and is reflected in the settlement boundaries and choice of allocated sites.
18. This distribution is, in very large part, a continuation of how the Council has distributed development since adoption of the LPSD and LPAD in 2016. This continuation reflects the broad success of that strategy and the continued – indeed, increasing – importance of promoting sustainable patterns of residential development.
19. Nevertheless, the Council has had to reconsider the distribution of development to Goole. This reconsideration has arisen from – and is justified by – the flood risk assessments that form part of the evidence base to the Local Plan Update. This evidence indicates clearly and robustly that Goole is at a significantly higher risk of flooding now than in 2016, both in terms of the extent of flooding and the hazard posed by such flooding. The majority of the town is now classified as being an in area where flooding is a danger to all. Accordingly, it is not sound at a strategic level to locate further residential development in Goole. The Council’s interpretation of that evidence has been agreed with the Environment Agency.
20. Taking into account existing commitments, this change of approach has resulted in a potential future shortfall of 900 dwellings to be built in the Goole and Humberhead Levels sub area. The Council recognises that promoting future residential development in this area remains important and as such it has considered six alternative locations for the re-provision of these dwellings. Of those alternatives, the Council has identified land to the north east of Howden as a strategic area of growth. This was very clearly the most preferable alternative: Howden is a sustainable location to accommodate further growth, with the most services and facilities of any of the options that were considered. Further, Howden has a good range of employment provision and development in this location will be both deliverable and complementary to the regeneration and economic growth of Goole.

## VI. THE PROVISION OF EMPLOYMENT LAND

21. There are four functional economic areas within the East Riding. The provision of employment land within these areas has been assessed by the Council through its Employment Land Reviews (“ELR”). The output of the ELR is two scenarios: a baseline scenario, which reflects a pessimistic, business as usual approach; and a higher growth scenario which reflects an optimistic, policy-on, approach that takes into account committed development projects, the inward investment pipeline and growth stimulated by policy changes, including the emerging Humber Freeport proposal.
22. Whilst these scenarios are neither forecasts nor targets, the Council has taken forward the higher growth scenario – with approximately 20,000 additional jobs – in the Local Plan Update. This approach is appropriate, given historic levels of take up and the need to provide a positive and flexible supply of employment land across the four functional economic areas.
23. On the basis of this approach, the Council has planned allocations to accommodate at least 383 hectares of employment land, including a significant allocation of 179 hectares at Hedon Haven to cater specifically for the expansion of the Port of Hull.
24. It is important to record that the planned employment land is not the product of a direct relationship with planned housing growth. Such an approach is not facilitated by the strictures of the PPG and the standard method for calculating local housing need which the Council is required to use. However, the approach in the ELR is based on a combination of labour demand and supply forecasts which are considered in the context of evidence on historic market take up. This is consistent with the PPG’s guidance on planning for employment land. Further and in any event, the Council has recently undertaken an analysis to demonstrate that, although there is no direct relationship between planned employment land and housing growth, nevertheless at a high level there is consistency between the planned levels of housing and employment land.
25. Finally, in respect of the emerging Humber Freeport, it is important to recognise that this is an evolving proposal. The Hull East Tax Site which straddles the boundary between Hull and the East Riding has been designated through secondary legislation and the Goole Tax Site awaits designation, but there remains uncertainty as to the

precise form that the Freeport will take and the proposals have changed during the plan-making process. Nevertheless, the Local Plan Update provides an appropriate response: there are two allocations within the Hull East Tax Site, where planning permission has been granted for the entirety of the allocations; and outside of these allocations, the Local Plan Update provides positive policy support, in a manner which is sound given the level of available evidence and certainty at this point in time.

## **VII. CONCLUSION**

26. All of these issues, as well as many others, will be explored through this Examination. The Council looks forward to progressing the Local Plan Update through this process and onwards to adoption.

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