

Our ref: General/40b – Planning Conformity/Final responses/Hull, Core Strategy, I&O, Aug 08

05 September 2008

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Dear Keith

### **Hull Core Strategy – issues, options and suggested preferred option**

The Yorkshire and Humber Assembly welcomes the opportunity to comment on the Hull Core Strategy – issues, options and preferred option document and to continue its involvement in the development of a coherent spatial planning framework for the region. The comments offered in this letter are intended to be within the spirit of continued and productive joint working.

At this stage, the Assembly's response to the consultation document is a set of officer comments. The aim is to highlight where issues related to general conformity with the Regional Spatial Strategy might arise. When the DPD is submitted to the Secretary of State a formal Assembly view on its general conformity with the Regional Spatial Strategy will need to be given.

The following officer comments are made in relation to the current RSS - The Yorkshire and Humber Plan, which was issued by the Secretary of State in May 2008. At this stage in the document's development, the Assembly would like the following comments to be taken into account.

The Yorkshire and Humber Plan aims to achieve a more sustainable pattern and form of development, investment and activity across the region, putting a greater emphasis on matching needs across the region with opportunities and managing the environment as a key resource. There is a particular emphasis on achieving the regeneration and renaissance of the region's city and town centres by making them the focus for housing, employment, shopping, leisure, education, health and cultural activities and facilities in the region.

## Key Points on the Core Strategy: Issues and Options

Below is a summary of the main points the Assembly wishes to raise with regards to the Core Strategy: Issues and Options. **Annex A** provides further detail for each of these issues.

1. Need to set out the need for the Core Strategy to be in general conformity with the RSS.
2. Need for the Core Strategy to address the relationship of Hull with the rest of the Humber Sub Area.
3. Welcome reference to the identification of Hull as a Regional City in RSS.
4. The Assembly is encouraged that paragraph A.38 makes reference to the renewable energy targets as set out in the RSS.
5. Options 6 rightly identifies the need for large-scale developments to incorporate on-site renewable energy technology.
6. Support the emerging approach to flood risk.
7. Concern there is no reference made to the RSS figures for net addition in Hull.
8. Pleased to see the issue of affordable housing is covered in this document.
9. Encouraged to see that the issue of Gypsy and Travellers is covered in Options 11.

I trust that the comments provided here, and expanded on in Annex A, are helpful to you as you prepare the Core Strategy: Issues and Options. Clearly we wish to see the Core Strategy developing in general conformity with the Regional Spatial Strategy and we look forward to discussing the points we raise here further on Monday 15 September.

Please do not hesitate to get in touch if anything is not clear. We look forward to working with you further on your Core Strategy and to commenting on the Preferred Options document in due course.

Yours sincerely



Andy Haigh  
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## **Annex A**

### **General Comments**

As you know, the Planning and Compulsory Purchase Act 2004 introduced mechanisms to help ensure that Development Plan Documents (DPDs) drawn up by local authorities as part of the Local Development Framework (LDF) are in general conformity with the Regional Spatial Strategy (RSS). The intention is to ensure that DPDs are contributing to the delivery of the RSS and that the two strands of the Development Plan for an area (the RSS and DPDs) are mutually supportive and not in conflict.

There is a need to set out the need for the Core Strategy to be in general conformity with the RSS, which for clarification is now The Yorkshire and Humber Plan (Regional Spatial Strategy to 2026) and was published on 21 May 2008. The Assembly also welcomes references made throughout the document to RSS (May 2008).

#### Hull in Context

Policies in RSS seek to focus development on the region's town and city centres. The Core Approach (Policies YH1-YH9) makes it clear that most new development, and high trip generating uses, should be focussed on Regional Cities and Sub-Regional Cities and Towns and that away from these sufficient development should be permitted in Principal Town to enable them to fulfil their role as service centres.

The Assembly welcomes the reference to the identification of Hull as a Regional City in RSS (paragraph 3.2). Policy YH4 of RSS provides for Regional Cities to be the prime focus for housing, employment, shopping, leisure, education, health and cultural activities and facilities in the region. More specifically, Policy HE1 A provides for plans, strategies, investment decisions and programmes for the Humber estuary to transform the role of Hull as a Regional City, particularly through remodelling the city centre to provide more and better jobs, shops, services, public spaces and homes, and transforming residential areas to create a better mix of housing and quality environments.

It will be important for the Core Strategy to set out the context provided by the sub area policies and the relationship that Hull has with the rest of the sub area, in particular with the East Riding.

Policy YH4 identifies Hull as a Regional City in the Humber Estuary sub area, with Scunthorpe and Grimsby/Cleethorpes as Sub Regional Towns. Policy YH5 identifies Driffield, Beverley, and Goole as Principal Towns.

Policy HE1 A the relevant sub area policy provides for plans, strategies, investment decisions and programmes for the Humber estuary to transform the role of Hull as a Regional City, particularly through remodelling the city centre to provide more and better jobs, shops, services, public spaces and homes, and transforming residential areas to create a better mix of housing and quality environments. The

role of Scunthorpe and Grimsby/Cleethorpes as Sub Regional Towns, particularly through town centre renaissance and housing renewal and growth. Also the roles of Beverley, Driffield and Goole should be supported as Principal Towns.

Policy HE1 E states that most development in the Humber Estuary sub area should be focussed on Hull, Scunthorpe and Grimsby/Cleethorpes, with development promoted at Goole, Beverley and Driffield to strengthen their service centre roles and where necessary aid regeneration or provide more affordable housing.

### Future Development Needs

Table 4.2 suggests development needs over the period to 2026. This table states that 650 dwellings will be required in Phase 1 (2008-2014), 1000 dwellings will be required in Phase 2 (2015-2020) and 1300 dwellings will be required in Phase 3 (2021-2026). It is unclear if these housing figures are net or gross figures, and the Assembly would wish to seek clarification on this.

### Broad, Guiding Principles

The Assembly is encouraged by Objective 6 which seeks *"to ensure that everyone knows about and addresses climate change through taking action and that new development a reduced carbon footprint"*. The Assembly is encouraged that Options 6 identifies the option of *requiring a percentage of energy requirements to be provided through on-site renewable energy for all new development, and increase the requirements year-on-year on the basis of targets set out in paragraph A.38."* The Assembly is encouraged that paragraph A.38 makes reference to the renewable energy targets as set out in the RSS. The RSS sets indicative targets for installed grid-connected renewable energy for Hull of 6 MW by 2010 and 39 MW by 2021 (Table 10.2, Policy ENV5).

The Assembly is encouraged that Options 6 identifies the possible option of identifying *suitable locations for renewable energy schemes, such as wind turbines, and seek contributions from developers to fund these schemes if 'on-site' renewable energy is not achievable'*. It is worth noting that RSS Policy HE1 C provides for the Humber Sub-Area to develop its renewable energy generation potential, whilst taking account of the potential cumulative impact of large numbers of wind turbines and associated development. Paragraph 5.17 of RSS emphasises that the Humber Estuary sub area has a major role to play in terms of the Region's renewable energy generation.

Options 6 also rightly identify the need for large-scale developments to incorporate on-site renewable energy technology. Policy ENV5 states the Region will maximise improvements to energy efficiency and increase renewable energy capacity. Plans, strategies, investment decisions and programmes should promote and secure greater use of decentralised and renewable or low-carbon energy in new developments, including through Development Plan Documents setting ambitious but viable proportions of the energy supply for new developments to be required to come from such sources.

The Assembly welcomes the reflection of flood risk in Option 7, as flood risk is clearly a major issue for Hull. The Assembly welcomes the references made to the Strategic Flood Risk Assessment which considers the most appropriate development locations and provides design guidance to protect against the risk of flooding. This will be an important tool in helping to determine how the Core Strategy will be delivered.

Policy ENV1 states that the region will manage flood risk pro-actively by reducing the causes of flooding to existing and future development, especially in tidal areas, and avoid development in high flood risk areas where possible. It also emphasises that flood management will be required to facilitate development in Hull.

### Quality of Life

The Assembly is encouraged that paragraph B.5 makes reference to the fact that RSS sets an overall housing requirement for Hull between the years 2004 and 2026 as being around 24,000 gross dwellings. However, there is no reference made to the RSS figures for net addition in Hull. RSS policy H1 deals with the provision and distribution of housing. Table 12.1 confirms an annual average net addition to the dwelling stock of Hull up to 2026 of 880 dwellings per annum. It is also worth noting that Table 12.1 also confirms that an annual average net addition to the dwelling stock of East Riding up to 2026 of 1150 dwelling per annum from 2008-2026 (of which 40% of this housing provision should be provided within the Hull housing market area).

To achieve Option 10 – providing a suitable scale, distribution and phasing of housing to meet the city's future needs it is suggested that this could be achieved through using the RSS housing figure of around 1,200 dwellings per year or using more up to date local Housing Market Assessment requirement of around 1,000 dwellings per year. The Assembly would suggest that it would be more beneficial to use the RSS net housing figure instead of gross. Also it is unclear as to whether the local Housing Assessment requirement of around 1,000 is a net or gross figure; therefore this will need to be clarified.

The Assembly is encouraged that in terms of phasing it is suggested that Hull work with East Riding of Yorkshire Council to seek to ensure continued restraint on housing land supply in its part of the Hull Housing Market Area, to help this sequencing.

We are pleased to see the issue of affordable housing is covered in the Issues and Options document. The Assembly welcomes paragraph B.50 which makes reference to the RSS affordable housing target for Hull. The Regional Housing Strategy 2005 identifies affordable housing need in the Hull district as being low. Policy H4 of RSS states that LDFs should set targets for the amount of affordable housing to be provided. Provisional estimates of the proportion of new housing that may need to be affordable in Hull are up to 30%. In Options 11 it is stated that in order to provide for the needs of existing and potential residents it should be ensured that more affordable housing is provided by applying an indicative local standard of 20% between 2008-2011, depending on the nature of the market.

The Assembly would support this indicative target providing that this target is supported by local evidence from the Housing Market Assessment.

The Assembly is encouraged that the issue of housing mix is covered in this document. It is suggested that a possible option should be to ensure that there is a more balanced housing mix in the city by seeking i) a greater proportion of large family homes; and ii) in the city centre or locations accessible to public transport, high quality apartments. Policy H5 in RSS (2008) emphasises the need for the current mix of housing in the Region to change so that it better supports the creation of more sustainable communities. The Policy recommends that plans, strategies, investment decisions and programmes should ensure the provision of homes for a mix that reflects the needs of the area, including homes for families with children, single persons, and older persons, to create sustainable communities

The Assembly is encouraged to see that the issue of Gypsy and Travellers is covered in Options 11. The RSS recommends that the Region needs to make additional provision to meet the housing needs of Gypsies and Travellers to address an overall short of at least 255 pitches. Policy H6 states that in the Humber sub region at least 34 pitches will be required by 2010 to address the shortfall in the Region. Policy H6 also requires local authorities to carry out an assessment of the housing needs of Gypsies and Travellers by July 2008. We feel to further develop the policy it would be beneficial to incorporate these provision targets, at least as an interim position until a more detailed local assessment is finalised.

Objective 14 provides support for major tourism and leisure related businesses within the city centre and in a following a sequential approach or is readily accessible to frequent public transport provision. This approach is in line with Policies YH4 and E2 of RSS.

### Jobs and Prosperity

The Assembly is encouraged that paragraph C.3 states that the Council has used the RSS to consider future land needs. However, it has not taken the RSS figure as its guide to future employment land requirements and will be using more up to date figures from the Employment Land Review. RSS Policy E3 makes it clear that land in use or allocated for economic development should be reviewed during the preparations of LDFs. Policy E3 also makes clear that local employment land reviews to inform LDFs should take account of the potential job growth set out in Tables 11.1 and 11.2. Table 11.1 suggests that the potential annual job growth from 2006 in the Hull district is 910 per annum. Table 11.2 breaks this figure down by different land uses.