



Hull
City Council

Sustainability Appraisal (SA) of the Kingswood Area Action Plan



SA Report Addendum

May 2016

REVISION SCHEDULE					
Rev	Date	Details	Prepared by	Reviewed by	Approved by
1	May 2016	SA Report Addendum to inform consideration of Potential Main Modifications to the Kingswood AAP	Mark Fessey Principal Consultant	Steven Smith Technical Director	Steven Smith Technical Director

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AECOM Infrastructure and Environment UK Limited
 6-8 Greencoat Place
 London, SW1P 1PL
 Telephone: +44(0)20 7798 5000
 Fax: +44(0)20 7798 5001

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1 INTRODUCTION

1.1 Background

1.1.1 On 30 November 2015, Kingston-upon-Hull City Council (“the Council”) submitted the Kingswood Area Action Plan (“the Plan”), and associated documents, for independent examination by a Planning Inspector appointed by the Secretary of State. One of the ‘associated documents’ submitted alongside the Plan was the Sustainability Appraisal (SA) Report.

1.1.2 Examination hearings were held in February 2016, subsequent to which the Council published a list of Potential Main Modifications (‘proposed modifications’) to the submitted plan. The Council suggest modifications in order to:

- address representations received during the 6-week publication period (June - July 2015);
- respond to the ‘Preliminary Questions’ asked by the Inspector, and his published ‘Matters, Issues and Questions’ document;
- respond to discussion at the Examination Hearings; and
- correct minor errors.

1.2 This SA Report Addendum

1.2.1 The aim of this SA Report Addendum is essentially to present an appraisal of the proposed modifications, with a view to informing consideration of proposed modifications.

1.2.2 First and foremost, this SA Report Addendum presents an appraisal of the proposed modifications, with a view to ascertaining whether they will result in any significant effects in terms of sustainability issues/objectives. Furthermore, consideration is given to the effects of ‘the Plan as modified’, i.e. consideration is given to updating the appraisal findings presented within the SA Report submitted alongside the Plan.

Reasonable alternatives?

1.2.3 The SA Report explains in detail how the AAP was developed subsequent to appraisal of reasonable alternatives. Specifically, it explains how alternatives were appraised for a range of policy issues, both area-wide/thematic and ‘focus area’ specific. Providing this information in the SA Report is important, given regulatory requirements.¹

1.2.4 The work to develop proposed modifications did not give rise to a (‘reasonable’) need to appraise alternatives and hence no information about alternatives is presented in this report. It was recognised at an early stage, upon examining the policy issues that were set to be a focus of proposed modifications, that the potential for ‘significant effects’ was limited and hence formal alternatives appraisal would not be proportionate.

1.2.5 It is important to emphasise that this is an *addendum* to the 2015 SA Report, and hence the two should be read together. At the time of AAP adoption an ‘SA Statement’ will be published that explains in full how the Plan (as modified) is justified on the basis of reasonable alternatives appraisal.

¹ In-line with the Environmental Assessment of Plans and Programmes Regulations (2004), the SA Report published alongside the draft plan must present an appraisal of ‘reasonable alternatives’ as well as ‘an outline of the reasons for selecting the alternatives dealt with’.

2 APPRAISAL OF THE PROPOSED MODIFICATIONS

2.1 Methodology

2.1.1 The appraisal is structured under the four sustainability themes identified through SA scoping (and used to structure the appraisal findings within the SA Report):

- Enhancing communities, health and social welfare
- Rejuvenating the economy
- Enhancing the city centre and local neighbourhoods
- Protecting and enhancing the natural environment

2.1.2 Listed under each theme is a list of sustainability objectives. Taken together, the sustainability themes and objectives provide a methodological 'framework' for the appraisal of likely significant effects on the baseline.

2.1.3 To reiterate, the focus of the appraisal is on the proposed modifications; however, explicit consideration is also given to the effects of 'the AAP as modified'.

Screening the Modifications

2.1.4 The first point to make is that only proposed 'main' modifications need be the focus of appraisal. The 18 proposed 'additional' modifications need not be considered further.

2.1.5 Of the 81 proposed main modifications (henceforth proposed modifications), the following can be 'screened-out', i.e. need not be a focus of appraisal:

- MM1, MM5 and MM23 - rectify a mapping error that had seen the extent of the District Centre slightly overstated.
- MM3 - modifies terminology, resulting in: "Minimises crime by the use of *Secured* by Design methods..."
- MM4 - adds the word 'enhance' to the following: "Environments that promote and enhance biodiversity."
- MM52 - clarifies that in the event of guidance on managing flood risk and groundwater being updated, the updated guidance and equivalent standard level will apply."
- MM53 - inserts the word 'current' in front of 'Hull Strategic Flood Risk Assessment'.
- MM6 - updates the reference to Hull's 'objectively assessed housing need' figure.
- MM15 - clarifies that reference to 'extreme weather' in practice means reference to 'increased river flows and more intense rainfall'.
- MM18 - clarifies that the Kingswood Historic Landscape Character Study forms an important part of the evidence base to informing planning decisions.
- MM24 - is a minor word change relating to the (albeit important issue of) phasing of development and associated flood defences.
- MM25 - is a minor word change relating to the (albeit important issue of) flood defence heights. The new wording adds a degree of flexibility, such that best available data can be drawn upon at the time of any planning decision.
- MM28 - clarifies the role of the Humberside Police's Designing Out Crime Officer (DOCO)
- MM30 - is a minor change to the policies map.
- MM31 and MM32 - are changes to the policy map legend.
- MM37 - deletes an instance of unnecessary repetition.

- MM38 - adds a new section heading.
- MM39 - clarifies references to Land Use Orders.
- MM40 - adds mention of 'services' (to supplement the existing reference to community facilities).
- MM41 - modifies all references to 'business/employment' to simply 'employment'.
- MM42 - modifies a reference to 'up to 420' school places to simply '420'.
- MM49 - makes consequential changes to the infrastructure delivery plan.
- MM50 - makes consequential changes to the monitoring framework.
- MM51 - involves very minor changes to the mapped boundaries of certain sites.
- MM54 - involves changes to Figure 11.1 – Road Network Plan. The effect is to clarify existing bus routes.
- MM57 - minor changes to maps
- MM60, MM64 - MM69 - changes to supporting text
- MM63, MM70, MM71 - minor change to policy wording
- MM72 - MM81 consequential changes.

2.2 Enhancing communities, health and social welfare

The sustainability objectives are to -

- Create a learning city enhancing levels of education and skills for all
- Improve the health of everyone and encourage healthy lifestyles
- Reinvigorate the housing market and ensure everyone has the opportunity to live in a decent and affordable home
- Encourage involvement, a sense of community and identity
- Support equity for all, tackling social exclusion and prejudice
- Maintain or enhance safety and reduce crime or fear of crime for everyone

Appraisal of proposed modifications

- 2.2.1 MM7 clarifies the situation with regards to existing secondary school provision, and the additional need that will be generated as a result of the Plan. It seems that the submitted plan had over-stated the need that would be generated. The proposed modification does not set new policy, but the change is of note. Also, MM43 - MM48 add important clarifications regarding the number of additional school places that are needed and will be sought.
- 2.2.2 MM11 clarifies that the stated 'open space design principles' also apply to greenways.
- 2.2.3 MM12 clarifies that account should be taken of the predicted effects of climate change, when planning for flood risk. Also, MM16 adds an important reference to the River Hull Integrated Catchment Strategy, clarifying that this report helps to give a picture of flood risk in Hull. Finally, in relation to flood risk, MM26 adds the requirement that: *"A geophysical survey of the flood bank will be required as part of the pre-construction investigative work, to check the condition of the clay core, so that remedial work can be undertaken if necessary."*

Appraisal of the plan as modified

2.2.4 The appraisal of the Plan, as presented within the 2015 SA Report, was as follows:

*“The AAP performs well in terms of all ‘communities, health and social welfare’ related SA objectives. The AAP performs particularly well – with **significant positive effects** likely - in terms of the objectives to –*

- *Improve the health of everyone and encourage healthy lifestyles – given the major focus on ensuring: a network of ‘greenways’, a network of ‘walkable’ local centres and a clear and logical street pattern.*
- *Reinvigorate the housing market and ensure everyone has the opportunity to live in a decent and affordable home – given a focus on ensuring a housing mix that is appropriate for Hull, and also a focus on achieving affordable housing and achievement of Lifetime Homes standards within particular developments (i.e. developments that need not have developer contributions directed to flood risk mitigation measures).*
- *Encourage involvement, a sense of community and identity – given a clear focus on reflecting community priorities in the design of green infrastructure, with this being particularly the case for Bude Park.*
- *Support equity for all, tackling social exclusion and prejudice – given a focus on developing Kingswood in such a way that Hull-wide regeneration objectives are supported, and particular regeneration objectives associated with neighbouring North Bransholme. With regards to the latter issue, there remain some uncertainties and so ongoing monitoring is called for.*

The objective to ‘Create a learning city enhance levels of education and skills for all’ is not a major focus of the plan, although measures are in place to ensure sufficient primary school places locally.”

2.2.5 The effect of the proposed modifications is to further support the conclusion that ‘significant positive effects’ are likely. The added emphasis on robust flood risk mitigation is welcomed. The other notable changes relate to the detail of school provision, and these changes are understood to be supported by the relevant authorities.

2.3 Rejuvenating the economy

The sustainability objectives are to -

- Maintain or provide good quality employment opportunities for all and reduce economic exclusion
- Create conditions which support regeneration and sustainable economic growth encouraging business diversity and investment
- Optimise creativity and innovation in business and design
- Optimise Hull’s economic role and position in the sub-region, region as a whole and internationally
- Promote Hull as a good place to live, work and visit

Appraisal of proposed modifications

2.3.1 None of the proposed modifications directly deal with ‘rejuvenating the economy’, nor is it anticipated that proposed modifications dealing with other matters will have a secondary/indirect effect on rejuvenating the economy.

Appraisal of the plan as modified

2.3.2 The appraisal of the Plan, as presented within the 2015 SA Report, was as follows:

*“The AAP performs well in terms of ‘rejuvenating the economy’ related SA objectives overall. In particular, the plan performs well – with **significant positive effects** likely – in terms of the SA objective to ‘promote Hull as a good place to live, work and visit’. **However**, there are one or two instances where the plan perhaps does not perform optimally in this respect. The plan reflects the decision to allocate land at Riverbank for housing rather than employment, which perhaps risks undersupply in the long term, albeit it is recognised that there is no demand to develop this site for employment in its entirety within the plan period. There are also some uncertainties regarding the role of the Kingswood Centre in the retail hierarchy, and the potential to detract from the role of the Hull City Centre as the primary retail centre. Both issues should be the focus of ongoing monitoring (e.g. there will be a need to maintain a watching brief on demand for employment land at Riverbank, which isn’t due to be developed for housing until the latter part of the plan period). At this point it is not possible to conclude likely significant negative effects.”*

2.3.3 The proposed modifications have no implications for the conclusions reached in 2015.

2.4 Enhancing the city centre and local neighbourhoods

The sustainability objectives are to -

- Maintain or enhance efficient land use
- Support sustainable travel and movement of people and goods
- Positively contribute to the quality of the built environment, townscape, and public realm
- Enhance the function of the city and district centres providing a complementary and appropriate mix of uses and facilities within and between centres
- Enhance access to quality leisure, cultural and recreational activities for all

Appraisal of proposed modifications

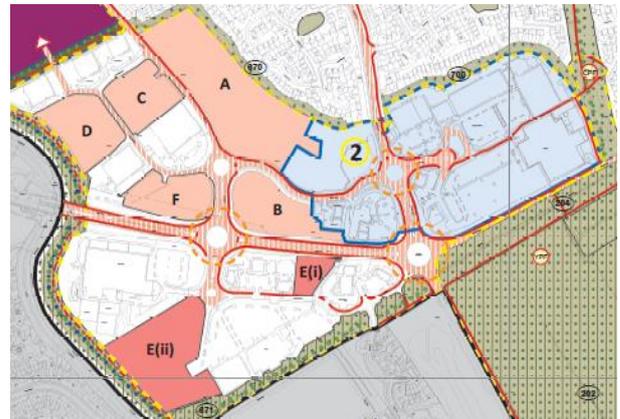
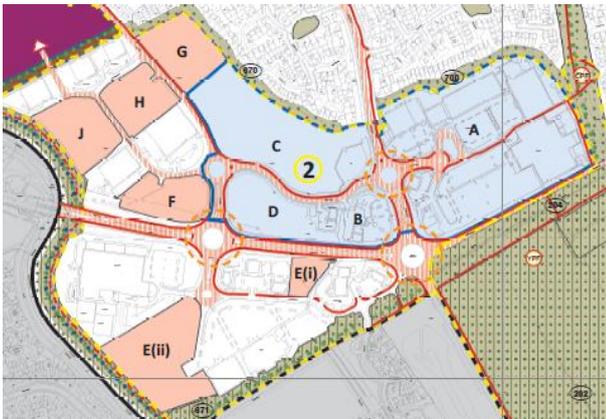
2.4.1 MM55, MM56, MM58 deal with the boundary of the District Centre, reducing its extent and also changing the use of land parcels with the wider area.

- The reduced District Centre will not extend as far to the west. It will include the existing shopping area (where ASDA is), the ‘Next’ development to the west and the hotel/office block/Kingswood pub to the west, as opposed to a larger site illustrated below. This means that there is no land designated for further development beyond the current Next development within the District Centre.
- All parcels outside the District Centre North of Raich Carter Way are allocated for community facility and employment uses only, shown as A, B, C, D and F on the ‘after’ map below, as opposed to being allocated to leisure uses too. The two sites E (i) and E(ii) south of Raich Carter Way remain allocated for employment, community facilities and leisure uses.
- Related to the point above, MM59 modifies Policy KAAP3D to ensure that any ‘main town centre use’ proposal (e.g. retail, leisure) outside the District Centre will be subjected to sequential and impact tests to ensure this is the most appropriate location for such a proposal and that it does not unduly impact on the City Centre and District Centres.²

² MM61 and MM62 deal with consequential changes, deleting Policy KAAP10B and KAAP10C; and modifying Policy KAAP10D.

Before (Submitted AAP)

After (with Proposed Main Modification)



* District Centre is the area shown in blue

Appraisal of the plan as modified

2.4.2 The appraisal of the Plan, as presented within the 2015 SA Report, was as follows:

“The AAP performs well in terms of all ‘enhancing the city centre and local neighbourhoods’ related SA objectives, although some question-marks remain that will need to be the focus of ongoing monitoring.

*The AAP performs particularly well – with **significant positive effects** likely - in terms of the objective to ‘positively contribute to the quality of the built environment, townscape, and public realm’. It is also the case that the carefully targeted approach to green infrastructure / open space provision will lead to significant positive effects in terms of the SA objectives to ‘support sustainable travel and movement of people and goods’ and ‘enhance access to quality leisure, cultural and recreational activities for all’. With regards to sustainable travel / movement, the plan does support road infrastructure upgrades, but these upgrades are necessary to address existing issues (i.e. are not simply catering for increasing demand over time) and it is also the case that upgrades may enable an improved bus service.*

*With regards to the objective to ‘enhance the function of the city and district centres providing a complementary and appropriate mix of uses and facilities within and between centres’ **some question-marks remain** (as has already been discussed under the ‘Rejuvenating the economy’ topic heading, above). It is clear that the hierarchy of District Centres, and the relationship between District Centres and the City Centre, are matters that should be the focus of ongoing monitoring.”*

2.4.3 The effect of proposed modifications is to improve the performance of the plan, as it is now the case that fewer ‘question-marks remain’ regarding the objective to ‘enhance the function of the city and district centres providing a complementary and appropriate mix of uses and facilities within and between centres’. It remains the case that ongoing monitoring is called for, however.

3 Protecting and enhancing the natural environment

The sustainability objectives are to -

- Efficient consumption of energy and natural resources
- Minimise pollution including greenhouse gases and enhance environmental quality
- Reduce waste, minimising the use of non-reusable materials and encourage recycling
- Reduce vulnerability of Hull to flooding and potential impacts of climate change
- Protect and enhance habitats and biodiversity

Appraisal of proposed modifications

- 3.1.1 MM2, MM13, MM14, MM17 add a degree of policy emphasis to the protection of groundwater, with added reference to groundwater in chapter and section headings, added reference to the importance of taking into account the implications of previous site uses and also that addition of the following statement: *“Some activities and detailed design may not be deemed acceptable. It is important that early discussions about the risks to groundwater from any development proposals are undertaken between the developer and the Environment Agency as well as Yorkshire Water.”*
- 3.1.2 MM8, MM9 and MM21 deal with the proposed green infrastructure network diagram. The proposal is to remove reference to one specific area as contributing to the network. The area in question lies immediately to the west of the Kingswood AAP area, and falls within East Riding of Yorkshire rather than Hull City. There is a need to remove reference to its green infrastructure role as the land is proposed for a Park and Ride facility by the East Riding Local Plan (which has recently been found to be sound, and should imminently be adopted). Whilst in theory Hull City Council might have discussed with East Riding Council the option of leaving this land undeveloped in order to ensure that it contributes to the green infrastructure network, in practice it is recognised that the need to deliver a Park and Ride facility would always take precedence.
- 3.1.3 MM10 adds a reference to green infrastructure enhancement opportunities, and sign-posts to national guidance. Also, MM11 clarifies that the stated ‘open space design principles’ also apply to greenways.
- 3.1.4 In relation to flood risk:
- MM12 clarifies that account should be taken of the predicted effects of climate change, when planning for flood risk.
 - MM16 and MM29 add important references to the River Hull Integrated Catchment Strategy, clarifying that this report helps to give a picture of flood risk in Hull.
 - MM26 adds the requirement that: *“A geophysical survey of the flood bank will be required as part of the pre-construction investigative work, to check the condition of the clay core, so that remedial work can be undertaken if necessary.”*
 - MM27 seeks to ensure enhanced protection, with one reference to the possibility of temporary flood defences removed and replaced by a clear statement regarding the need for *“new replacement flood defences to be provided prior to the occupation of any properties in the Riverbank area.”*
- 3.1.5 MM19 reflects comments received from the Humber Archaeology Partnership. The intention is to ensure that historic/archaeological assets are considered on a par with natural assets. Also, MM20 adds a detailed description of important historic/archaeological assets that might be taken into account (when designing schemes and when making planning decisions). This approach is broadly supported, in terms of the objectives listed above.

- 3.1.6 MM22 inserts a policy statement to ensure that culverting the Engine Drain is only considered as a 'last resort'. This is primarily on the basis of the ecological impacts of any such scheme.

[Appraisal of the plan as modified](#)

- 3.1.7 The appraisal of the Plan, as presented within the 2015 SA Report, was as follows:

*"The AAP is likely to result in **significant positive effects** in terms of the objective to 'protect and enhance habitats and biodiversity'. In some cases there is perhaps an emphasis on managing green infrastructure for access, as opposed to managing for biodiversity; however, this is broadly appropriate given the need to ensure that natural assets are enjoyed, managed and appreciated in the long term.*

*The objective to 'reduce vulnerability of Hull to **flooding** and potential impacts of climate change' is obviously an important objective, given the prevalence of flood risk. Numerous measures are set to be implemented to avoid / minimise risk as far as possible; however, it is not possible to conclude 'significant positive effects' given that the decision has been taken to develop land at Riverbank for housing that might otherwise (in the long term, at least) be used for employment (i.e. a less susceptible land use). It is recognised that there are good reasons for housing allocation at Riverbank, as discussed within the Council's 'Sequential Test' report, and also under the 'Enhancing communities, health and social welfare' heading above; and it is recognised that detailed policy measures are proposed to ensure that risk is minimised. A high housing growth approach at Kingswood (which means housing at Riverbank) will enable the funding of river defences that will ensure the long term protection of the whole of Kingswood; and of course it is the case that there is a need for housing growth at Kingswood in order to achieve city-wide objectives (in particular around attracting and retaining key workers and families). It is not really the case that an alternative approach could be taken whereby there is a greater emphasis on employment (at Riverbank, or at Kingswood in general), as studies have shown that there is insufficient demand at the current time."*

- 3.1.8 The effect of the proposed modifications is to further support the conclusion that 'significant positive effects' are likely. The green infrastructure network will not, in practice, be quite as extensive/robust as envisaged within the submitted plan; however, this does not have a bearing on the conclusion from 2015 ('significant positive effects').

4 CONCLUSIONS AT THIS CURRENT STAGE

4.1.1 The overall conclusions presented within the 2015 SA Report were as follows:

The appraisal suggests the likelihood of significant positive effects in terms of 'communities, health and social welfare' related SA objectives. Development will contribute to immediate Hull-wide regeneration objectives, and will also result in an inclusive new community where there will be the potential for new residents to lead healthy lifestyles. In terms of economic objectives, some question-marks remain regarding the long-term effects of developing land for housing that might alternatively be developed for employment floorspace, but it is recognised that in the short to medium term there is a need to act (which means supporting housing). In terms of environmental objectives, the plan performs well in terms of capitalising on existing natural assets and opportunities for enhancement. Flood risk is a key issue that is at the heart of the plan. Numerous measures are set to be implemented to avoid / minimise risk as far as possible; however, the allocation of land at Riverbank for housing could result in some risk.

No major recommendations are put forward at this stage. There could be opportunities for further work to be undertaken around some issues, with a view to adding further detail to the plan, but there are time pressures, i.e. there is a need to get a plan in place. For example, further work might be undertaken to understand green infrastructure opportunities (including around the local wildlife sites) in greater detail with a view to setting more detailed policy.

The main recommendation is to put in place a considered approach to monitoring, including in relation to the city-wide hierarchy of 'centres' and the need / demand for employment land. Monitoring recommendations are discussed further in Part 4 ('What happens next?') below.

4.1.2 The Modifications have been found to support the achievement of sustainability objectives, and no major negative effects / trade-offs have been identified. The added emphasis on robust flood risk mitigation is welcomed. Other notable changes relate to the detail of school provision, and a modified role for the District Centre.

Monitoring

4.1.3 The 2015 SA Report proposes monitoring indicators in-light of appraisal findings. Given the appraisal findings presented in this SA Report Addendum, it is suggested that particular emphasis be given to monitoring the provision of school places.

5 NEXT STEPS

5.1.1 The next step is for the Inspector to consider the representations raised as part of the consultation, alongside this SA Report Addendum, before deciding whether he is in a position to write his report on the Plan's soundness.

5.1.2 Assuming that the Inspector is able to find the Plan 'sound', it will then be formally adopted by the Council. At the time of adoption an 'SA Statement' will be published that explains the process of plan-making / SA in full and presents 'measures decided concerning monitoring'.