



Hull Local Plan: 2016 to 2032

Brunswick House and The Strand

Supplementary Planning Document

18

2nd Consultation Statement -

June 2021

Background

- 1.1 In preparing Supplementary Planning Documents (SPDs) the Council is required to follow the procedures laid down in the Town and Country Planning (Local Planning) (England) Regulation 2012.
- 1.2 Regulation 12 states that before adoption of a SPD the local planning authority must prepare a statement setting out:
 - the persons that the local authority consulted with when preparing the SPD;
 - a summary of the main issues raised by those persons; and
 - how those issues have been addressed in the SPD.
- 1.3 The Consultation Statement and accompanying Draft SPD 18 – Brunswick House and The Strand was made available for final public consultation prior to adoption between Monday 8th March and Monday 5th April 2021.

Consultation responses

- 2.1 Following the four week consultation period the Council received four Comments. These comments are set out in table 1 below, together with the Council's response.

Changes to the SPD

- 3.1 No further sustentative changes have been made to the SPD in response to the second round of consultation and accordingly the intention is to proceed to adoption.

Table 1: Summary of representations

Respondent	Comments Received	Council Response
<p>Historic England</p>	<p>We support the production of an SPD to guide how this site might be developed. Given the recognised importance of Hull’s historic environment, providing a framework which will not only help to realise the full potential of this site but, as importantly, will also ensure that those elements which contribute to Hull’s distinctive character are safeguarded is supported. The document provides a good summary of the historical and architectural significance of the site and its surroundings. We particularly welcome the opportunity to sensitively restore and bring the former Blundell Street School (The Strand), a Grade II Listed Building, back into an active and sustainable use.</p> <p>The Beverley Road Conservation Area is currently included on the Heritage at Risk Register. The southern section of the Conservation Area was also recently subject to a Townscape Heritage Initiative grant scheme. The SPD provides an opportunity to enhance and better reveal the significance of the Conservation Area, and to address the issues which have caused Beverley Road to be placed on the Heritage at Risk register.</p> <p>However, we have concerns with a number of the site specific design considerations set out in section 3.5 and the indicative layout illustrated in Figure 14 of the draft SPD. When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation, with any harm to, or loss of, the significance of an asset requiring clear and convincing justification.</p> <p>The Council has a statutory duty under section 72 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to pay special attention to the desirability of preserving or enhancing the character or appearance of its Conservation Areas. The NPPF makes it clear that the loss of a building (or other element) which makes a positive contribution to the significance of a Conservation Area should be regarded as resulting in either substantial or less than substantial harm to that area, as appropriate, depending on the relative significance of the element affected and its contribution to the significance of the Conservation Area. Under section 66(1) of the 1990 Act the Council must also have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest</p>	<p>This representation puts too much emphasis on a single element of the site’s context. The former street pattern and tight urban grain is but one consideration, albeit an important one, as looking to the past is often key to informing a design approach. HCC through input from specialist conservation staff believes the indicative layout is sensitive to the setting of the heritage assets. Furthermore it can be refined when an actual scheme is being worked up. A pragmatic approach has been adopted having regard to the history of this area but in light of the full (and existing) context of the site.</p> <p>The rows of nineteenth century terraces running N-S with housing courts at right angles from the principal streets have now largely disappeared – there is no longer a prevailing historic fabric into which to ‘stich’ the site. It is not until you get much further north along Beverley Road that the historic grain is intact across a wider area.</p> <p>The area between the east of Beverley Road and the river was largely replaced by a post-war Radburn-type housing estate bounded by the loop formed by Bridlington Avenue.</p> <p>The context to the immediate east of Beverley Road surrounding the site is currently characterised by the blurred relationships between what is public and what is private, too much permeability, and left-over public open spaces with no clear function, weak enclosure, and no sense of ownership. As drafted the SPD takes the opportunity to set the parameters for addressing these issues using sound urban design principles, whilst integrating the heritage</p>

<p>Open Space Development Officer (HCC)</p>	<p>which they possess. It is critical to get the structure of the layout right from the outset as this will guide future applications for the development of the site. The current indicative layout does not get the forms or alignments of the blocks right, which makes the spaces questionable in terms of how they will function.</p> <p>In heritage terms, there would be great benefits to the setting of the historic buildings - the iconic landmark buildings, but also the terrace along Clifton Street - flowing from reinstating of the alignment of the former Blundell Street (length as well as width). A new long, main north-south road could serve as the principal access through with active frontages facing onto it, strengthening the strong lines that would echo the previous grid pattern form. This would help to set the tone for the urban form of the development and attempting to 'stich' back together disparate parts of the historic environment. We consider that the underlying principle should be to reflect, in a contemporary way, the previous high density of development in this area, creatively incorporating parking.</p> <p>Buildings of 3.5 storeys may well be too tall in the most sensitive viewing corridors, such as those from Brunswick Avenue. However, by increasing the density of development on the ground this would potentially enable a larger number of units to be delivered on the site. This would also allow the larger, higher status iconic historic buildings to retain their prominence in the new dynamic streetscape. Flowing from this is the need to pull back (eastwards) the large northern block to allow improved views (as identified important views) from the north western end of Strand Close, looking south east.</p> <p>Finally, the reference to the use of steep gabled fronts should only be used for some feature, corner buildings or buildings to mark pockets of open space, this should not be applied as a general principle for the whole site. Otherwise, this detail could jar with the surrounding historic streets.</p> <p>Historic England provides a pre-application service that we would recommend prospective applicants utilise at an early stage of project development:</p> <p>https://historicengland.org.uk/services-skills/our-planning-services/charter/Our-pre-application-advisoryservice/</p> <p>The LPA should be clear about the legal requirement in relation to the site's potential to support bats, a European Protected Species. Buildings are of an age and construction that they</p>	<p>assets.</p> <p>There are also very good reasons for retaining the existing street pattern (rather than attempting to recreate the former street pattern). These include: cost, current highway design standards, sustainability and carbon footprint. Partially recreating a former street pattern would be counterproductive in terms of the cost of replacing the existing roads and thus diverting funds away from securing and refurbishing the heritage assets (including a listed building at risk).</p> <p>The Council accepts that a number of relatively minor changes can be made to the SPD to address issues raised by Historic England, namely;</p> <p>Reducing the indicative heights of the building directly opposite The Strand from 3.5 floors to 2.5 and allow for a range of 2 – 3 storey heights across the indicative layout. <i>Map in figure 14 (Indicative Layout) has been altered to reflect this change.</i></p> <p>The SPD should make reference to integral parking within the ground floor of townhouses as one potential parking design solution the reason being to help create stronger urbanism by getting parking away from frontages so that streets and spaces are defined by the buildings and don't become overly wide with parking on both sides. <i>The third paragraph of the Building types, forms and scale section has been altered to reflect this change.</i></p> <p>The indicative plan establishes broad parameters for the site in relation to layout and design focussing largely on built heritage</p>
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<p>Yorkshire Wildlife Trust</p>	<p>support potential roost features. The need to address potential impacts upon European Protected Species prior to determination of planning applications has been established by policy, legislation and case law. The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019) makes it clear that a Planning Authority is a competent authority for the purposes of the regulations, and must have regard to the requirements of the Habitats Directive in the exercise of their functions. Furthermore government guidance contained within ODPM Circular 06/2005 and key principles of the NPPF make it clear that surveys for protected species need to be complete, and any measures necessary for the protection of the species should be in place through conditions and/or obligations before permission is granted.</p> <p>The scheme is likely to come forward once the Environment Bill has been ratified and there is a mandate to deliver a net gain in biodiversity as demonstrated by the Defra metric. In accordance with the British Standards on Biodiversity BS: 42020 and draft 8683, ecological assets on site should be considered at the design stage and the mitigation hierarchy should be followed. The site currently supports several natural features including hedgerow, mature trees, ruderal habitats and bare earth. Mature trees and groups of trees should be assessed in line with BS5837: 2012 survey. The production of a Tree Constraints Plan should help inform the design and the retention of the best specimens will be prioritised. Trees lost to facilitate development should be replaced at a ratio of 2:1</p> <p>There does not seem to be any consideration for ecology within this masterplan. As a minimum, existing buildings must be considered for their importance for roosting bats; however, in line with NPPF, PPG and the emerging Environment Bill, we would also be encouraged to see an early commitment to deliver 10% biodiversity net gain, as demonstrated by the Defra metric (v.2.0 or v.3.0 when released), in line with other commitments by developments nationwide. In accordance with the draft British Standard (8683), proposals should show at an early-stage consideration of management, monitoring and maintenance of these areas along with responsible persons for each stage of implementation.</p> <p>Good place making and green infrastructure should be at the heart of development design and</p>	<p>considerations. The document however has to be read in conjunction with specific policies contained within the Hull Local Plan in relation to for example biodiversity and wildlife (Policy 44), Green Infrastructure and Green Network (Policy 43) and other more general policies relating to open space, trees and sustainable development / design principles. Likewise, it has to be seen alongside other relevant SPDs such as the Hull Residential Design Guide. Specific matters are highlighted in the SPD where these can add value to the policy approach and in particular when they can expand on locally significant features.</p> <p>Agree however that it would be useful to add an additional paragraph as follows:</p> <p>‘3.11 Natural Environment Applicants will be required to submit both arboriculture and ecological assessments. These reports should be used to help inform the design of the scheme and prioritise the retention of the best trees on site. Should impacts on protected or notable species and habitats be identified (e.g. bats), mitigation measures need to be addressed prior to planning permission being granted. Biodiversity net gain should be in line with prevailing national guidance.’</p> <p>Refer to comment made in response to BR02 above.</p> <p>Agree to add the following to the (new – see above) paragraph 3.11 ‘In addition, applicants will be encouraged to reflect on exemplar schemes from elsewhere and to use Building with Nature standards in developing proposals for the site’.</p>
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	<p>we would strongly encourage the application of Building with Nature standards to be incorporated across the scheme.</p> <p>Building with Nature is a framework that enables developers to integrate high-quality multifunctional green infrastructure to create places in which people and nature can flourish. It provides developers with a possible mechanism to deliver several local and national policies/guidance, relating to biodiversity, SuDs and community wellbeing.</p> <p>Building with Nature sets out standards to provide a benchmark against industry guidance, in order to provide a qualitative assessment of a proposed development site. The Building with Nature (BwN) key themes are:</p> <ul style="list-style-type: none"> • Core – Distinguishing green infrastructure from a more conventional approach to provision of open and green space. • Wildlife – to protect and enhance wildlife, creating networks where nature can thrive, and supporting the creation of development which more effectively delivers a net gain for wildlife. • Water – a commitment to improving water quality, on site and in the wider area: reducing the risk of flooding and managing water naturally for maximum benefit. • Wellbeing – to deliver health and wellbeing benefits through the green features on site, making sure they can be easily accessed by people close to where they live. <p>Building with Nature is a voluntary approach developed by practitioners, policymakers and academic experts, and tested with the people who will use and benefit from the framework. There are three levels of accreditation; Design, Full (Good) and Full (Excellent) and schemes can be assessed at pre-application, reserved matters and post-construction/in-use stages. Further information can be accessed via the website: https://www.buildingwithnature.org.uk.</p> <p>We are concerned that the proposals do not currently go far enough to encourage the enhancement and connectivity of biodiversity across the site. Green Infrastructure on such developments must be multifunctional; providing benefits for drainage, people, wildlife, and carbon offsetting targets of the council, whilst being designed with local landscape characteristics in mind.</p> <p>In order to provide benefits for people, the GI should consider the current usage and structure of features in the local areas and be supported by community consultation. For instance, POS</p>	<p>This is clearly a relatively small site and the opportunities to create connected routes throughout are limited. Nonetheless the following statement will be added to the end of Paragraph 3.11- ‘Applicants will be encouraged to consider the potential to achieve connected routes comprising existing and new open space within the site and where possible to also ensure linkages with open spaces beyond the boundary of the site. This will be of benefit to both</p>
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<p>Natural England</p>	<p>should offer opportunities such as allotments or community orchards to aid community cohesion with provision of Suitable Accessible Natural Greenspace (SANGs) also supporting residential areas designed in line with Natural England guidance. The provision of green footpaths and cycle routes between the sites will again further encourage community cohesion and carbon offsetting to support Barnsley's net Zero targets.</p> <p>Consideration of green roofs and living walls would also provide numerous benefits for people and wildlife, by providing additional habitat, reducing heating/air conditioning costs of buildings by further stabilising temperatures, aiding carbon sequestration targets and delivery positive health and wellbeing impacts. Passive house standards should also be considered in the design of buildings in order to reduce their carbon footprint.</p> <p>Consideration of sustainable and low carbon construction methods should also be considered for the development on site. In particular with features to protect the adjacent woodland habitats with suitable green buffers through development.</p> <p>Looking at the site as a whole, rather than a piecemeal approach for individual planning applications will ensure appropriate and affordable mitigation, compensation and enhancement can be incorporated at an early stage of development with minimal temporal lag.</p> <p>In order to incorporate the above, we would encourage the developers to seek advice from exemplar projects both nationally and internationally and consider schemes such as Building with Nature.</p> <p>While we welcome this opportunity to give our views, the topic this Supplementary Planning Document covers is unlikely to have major impacts on the natural environment. We therefore do not wish to provide specific comments, but advise you to consider the following issues:</p> <p>Biodiversity enhancement</p> <p>This SPD could consider incorporating features which are beneficial to wildlife within development, in line with paragraphs 8, 72, 102, 118, 170, 171, 174 and 175 of the National Planning Policy Framework. You may wish to consider providing guidance on, for example, the level of bat roost or bird box provision within the built structure, or other measures to enhance biodiversity in the urban environment. An example of good practice includes the Exeter Residential Design Guide SPD, which advises (amongst other matters) a ratio of one nest/roost box per residential unit.</p>	<p>local people and wildlife'.</p> <p>The SPD includes reference to sustainable development and in particular to a 'fabric first' approach. This alongside more specific policies set out in the Local Plan are considered to provide a clear policy steer for this site.</p> <p>No changes required – reference to sustainable construction already included.</p> <p>This is exactly the reason that the SPD has been produced.</p> <p>See earlier comment.</p> <p>Refer to general response made to Yorkshire Wildlife Trust.</p>
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	<p>Landscape enhancement</p> <p>The SPD may provide opportunities to enhance the character and local distinctiveness of the surrounding natural and built environment; use natural resources more sustainably; and bring benefits for the local community, for example through green infrastructure provision and access to and contact with nature. Landscape characterisation and townscape assessments, and associated sensitivity and capacity assessments provide tools for planners and developers to consider how new development might make a positive contribution to the character and functions of the landscape through sensitive siting and good design and avoid unacceptable impacts.</p> <p>Protected species</p> <p>Natural England has produced Standing Advice to help local planning authorities assess the impact of particular developments on protected or priority species.</p> <p>Strategic Environmental Assessment/Habitats Regulations Assessment</p> <p>A SPD requires a Strategic Environmental Assessment only in exceptional circumstances as set out in the Planning Practice Guidance here. While SPDs are unlikely to give rise to likely significant effects on European Sites, they should be considered as a plan under the Habitats Regulations in the same way as any other plan or project. If your SPD requires a Strategic Environmental Assessment or Habitats Regulation Assessment, you are required to consult us at certain stages as set out in the Planning Practice Guidance.</p> <p>Should the plan be amended in a way which significantly affects its impact on the natural environment, then, please consult Natural England again.</p>	<p>The SPD takes forward an approach already agreed in the adopted Hull Local Plan and as such, it is not considered that SEA/HRA is required.</p>
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