

# Hull Local Plan: 2016 to 2032

# Residential Design Guide Supplementary Planning Document 7

Consultation Statement

July 2019

### 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 This Consultation Statement accompanies the Residential Design Guide Supplementary Planning Document. This document provides additional planning guidance on Policies of the Hull Local Plan: 2016 to 2032, which was adopted on the 23<sup>rd</sup> November 2017.

#### Consultation

- 2.1 Preparation of the draft SPD involved engagement with other Council departments, including, Access officer, Highways, Housing, Public Health, Planning Policy and Development Management officers. The draft SPD has been through the Council's committee regime and elected members have had the opportunity to comment on the draft document.
- 2.2 The draft SPD was made available for public consultation for eight weeks between Tuesday 23<sup>rd</sup> April 2019 and Monday 17<sup>th</sup> June 2019. A public notice to publicise this event was published in the Hull Daily Mail on Tuesday 23<sup>rd</sup> April 2019. The consultation was also reported at Planning Committee in March 2019 and Cabinet Committee in April 2019.
- 2.3 The draft SPD and associated documentation was made available for inspection on the Council's website and at the following Council

#### locations:

- the Wilson Centre;
- Guildhall reception;
- Hull History Centre; and
- all Council Customer Service Centres and libraries.

# **Consultation responses and main issues**

3.1 Following the eight weeks consultation period the Council received two representations highlighting specific issues. Other responses received did not raise any specific issues and supported the need for an SPD. A summary of these representations together with the Council's response are contained in Appendix 1.

# Main changes to the SPD

4.1 The responses to the consultation have been considered in preparing the final SPD for adoption. Where comments received have led to changes to the SPD this is indicated in appendix 1 Summary of representations.

# **Appendix 1: Summary of representations**

Respondent	Comments Received	Council Response
BSB Architecture	It would be good to know what the proposed minimum separation distances between dwellings are going to be so we can comment. They are referred to on page 77 of the document (page 39 of the pdf) as 'TBC'	Distances given are for guidance purposes and will be used to inform decisions where separation distances between dwellings are provided without justification.
Persimmon Homes	Well-connected layouts Paragraph 2.2 states that "multiple routes in and out proposals based on a single point of access will not be supported". Although it is understandable that a single point of access on a development site is not appropriate in most occasions, however some sites may not be able to meet this requirement due to site restrictions	Agree with the general sentiment expressed. The SPD as written does not preclude such negotiations and recognises there are circumstances where a single point of access will

by technical constraints and the scale of the development site, we feel that it is important that the council would considered the opportunity for negotiation on these occasions.

be deemed appropriate.

No change to SPD necessary.

#### Cul-de-Sacs

The first paragraph states that cul-de sacs undermine attempts to develop a well-connected network of streets, as they create a series of dead ends which reduce connectivity of the development and the city centre. While there is consideration that cul-de-sacs are popular with those who live in them due to the reduction of through traffic and a sense of a 'gated community', there is still an overarching conclusion that cul-de-sacs are often not appropriate.

It can be said that cul-de-sacs provide a level of surveillance and traffic reduction that many desire. Cul-de-sacs provide a design that favours the pedestrian over the car. While cul-de-sacs reduce through traffic, they create safer environments which encourage activities such as walking and cycling, and particularly make environments safer for children 'playing out'. The creation of 'dead-ends' allows residents to feel greater ownership over their street – many residents, particularly parents and the elderly desire this type of surveillance for added sense of security.

Housing developments which contain a series of cul-de-sacs rather than cul-de-sacs that 'punctuate development blocks on an otherwise connected grid' can also fit the needs of prospective buyers, as sometimes a development that connects to less desirable neighbourhoods affects the marketability of homes, alongside reducing the feeling of safety and security many desire.

Views expressed are disputed and contrary to Hull City Council's urban design principles.

The SPD does not preclude the use of cul-desacs in new residential development but rather the guidance makes clear they work best on a small scale.

The final sentence of the comment refers to development that connects to 'less desirable neighbourhoods' and how this 'affects the marketability of homes'. This view is elitist and promotes a segregated society – values that are contrary to the aims and objectives of the Hull Local Plan and this SPD.

No change to SPD necessary.

#### **Townscape Materials**

The fourth paragraph in this section states that in Hull the predominant materials used are: 'brick, stone, glass, wood, slate and clay'. While slate and clay are traditional materials for Hull, they are not needed to build residential as there are alternative and replica materials available. Replacement with modern materials such as concrete should be considered as a suitable option. Concrete provides the 'toughness and durability' which the SPD states as value in section 4.6, often lasting longer than common building materials. Alongside this, concrete is a more sustainable material due to its manufacturing process. The NPPF Chapter 17 particularly focuses on the careful use of minerals. Alternate materials provide smaller mineral makeup to that of slate and clay, and

SPD does not preclude the use of concrete roof tiles in appropriate circumstances.

No change to SPD necessary.

are therefore favoured.

#### **Building Design Resilience**

While there is significant flood risk in Hull, 'sacrificial ground floors' as mentioned in the second paragraph are not practical for everyday life. Developments should take into account flood risk and how to mitigate the effects of flooding; however, changing traditional notions of living is not essential. Alternative methods of mitigating flood risk such as raising plug sockets, or having a place of refuge could be more appropriate for everyday living.

As for the development itself, as mentioned in the Sustainable Drainage section of the SPD, initiative can be integrated within 'site layouts, street design and gardens', which has a less significant impact on lifestyle for residents, while increasing drainage of water on the site. This is in line with NPPF section 14, paragraph 149 which states plans must take a proactive approach to mitigating and adapting sites with flood risk in mind.

Agree with the sentiment expressed. Acknowledge that the term 'sacrificial' can be interpreted negatively.

Change word 'sacrificial' to 'resilient'.

#### Modular housing

Although it seems using modular housing could offer potential benefits such as reducing on-site waste, streamlined constructions methods, reduced ecological impacts and affordability; the disadvantages of using modular housing in the short and long-term are not well established in the house building industry. However, this new build methodology is not widely used. Various aspects such as the financial implication whether it is viable or not, the efficiency of housing delivery and the quality of the end product through using this build method should be carefully considering before implementation by the developer.

Comment noted.

No change to SPD necessary.

#### **Smarter Homes**

In the first paragraph it is mentioned that new homes built in the lifetime of the Local Plan should be smart homes. This requirement seems unnecessary, and requires features that should be optional to the resident. For a housing development to be granted planning permission there is no policy that states these additions should be supplied. For example, the addition of Telehealth systems and battery storage are not necessary, and should be added by the resident if desired. There is no evidence to suggest every home owner desires or requires smarter homes, and standard homes can always be adapted throughout their lifespan to suit the resident.

Accept comment.

Change emphasis to read a 'New homes built in the lifetime of the Local Plan are encouraged to be designed as smart homes.

#### **Daylight and Sunlight**

In paragraph 3 of this section it is said that the minimum floor to ceiling height of 2.3m is not

SPD encourages designers to exceed

adequate, and impedes good design. Arguably, 2.3m would not be the minimum floor to ceiling height if it didn't provide suitable design and sufficient amounts of daylight through. Persimmon would reject the notion that 2.3m cannot provide good design and well proportioned homes - the minimum requirements provide sufficient living space, and alongside windows allow satisfactory amounts of light through.

minimum standards in the pursuit of good design – a legitimate position to take.

The respondent's use of terms such as "sufficient living space" and "satisfactory amounts of light" only serves to substantiate the SPD objectives.

No change to SPD necessary.

# Space between Homes

In the first paragraph it is stated that new detached and semi-detached dwellings should have a plot area to building footprint ratio generally larger than 60:40. Persimmon tends to provide 60:40 on detached and semi – detached properties in Hull. This garden size provides enough space for children to play, and does not need to be greater in order to provide a 'decent' sized garden. Similarly, from example terraced Persimmon homes in the Hull area there are 40:60 hard to soft landscaping ratios instead of the suggested 50:50 recommendations. This ratio still provides sufficient indoor space for terraced houses.

Regarding the 60:40 ratio the sentiment expressed by the respondent is accepted. Regarding the 50:50 this guidance is consistent with Building For Life 12 and will not be changed. It should be recognised however that the ratio is a recommendation.

Change the term 'greater than 60:40' to read 'guided by a general ratio of 60:40'.