



# Hull Local Plan: 2016 to 2032

SPD11 Protecting existing and providing new  
open space

Supplementary Planning Document

Consultation Statement

October 2018



## **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) Regulations 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 Protecting existing and providing new open space Supplementary Planning Document. This document provides additional planning guidance on Policy 42 (Open space) 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 Public Health 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 six weeks between Monday 9<sup>th</sup> July 2018 and Monday 20<sup>th</sup> August 2018. A public notice to publicise this event was published in the Hull Daily Mail on Monday 9<sup>th</sup> July 2018. The consultation was also reported at Planning Committee on 19<sup>th</sup> June 2018 and Cabinet on 25<sup>th</sup> June 2018.

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 six weeks consultation period the Council received 2 representations. Both representations support the SPD and expressed agreement with the proposals to retain open spaces wherever possible and encourage the provision of new open space within development. Representations were submitted by Hull and East Yorkshire Local Nature Partnership (LNP) and Yorkshire Wildlife Trust. A summary of these representations together with the Council's response are contained in Appendix 1.

3.2 The main issues raised through the consultation were:-

- Sustainable drainage - The LNP recommends that open spaces should deliver multiple benefits and points to 'The Aquagreen Initiative' as an example of multi-beneficial new open space. Therefore the LNP supports the reference to the integration of sustainable drainage schemes within new developments.
- Ecological features - Yorkshire Wildlife Trust would like to see reference made to incorporating ecological features in new open spaces.
- Green Infrastructure - while the LNP welcomes the promotion of green infrastructure within the SPD, Yorkshire Wildlife Trust would like to see specific mention made to the creation of new green infrastructure and green corridors to improve ecosystems within the city.
- Biodiversity - Yorkshire Wildlife Trust stated the SPD could make more reference to the revised NPPF's 'environmental objective'

which includes improving biodiversity.

- Shortfall in open space provision - the LNP supports the requirement that housing developers provide open space contributions where there is a shortfall in open space provision near to the development site.

## Main changes to the SPD

4.1 The responses to the consultation have been considered in preparing the SPD and the main changes are summarised below:

- amend paragraph 4.1 to add that more than one type of open space can be accommodated within an individual area of new open space.
- add a paragraph after 4.1 to include a reference to encouraging developers to incorporate ecological features in proposed new open spaces and to use native species whenever possible in such schemes.
- include the revised NPPF reference to providing net gains for biodiversity after paragraph 3.2 to reflect current planning guidance
- amend all NPPF references and quotes to the revised version (produced in July 2018) to clarify that the SPD meets current planning guidance.

## Appendix 1: Summary of representations

Respondent	Comments Received	Council Response
Hull and East Yorkshire Local Nature Partnership	<p>The LNP supports the SPD's proposal to retain open spaces wherever possible and to create new open spaces within development due to the range of benefits they provide to society, the need to increase Hull's natural capital to combat the loss of biodiversity and to future proof the city against unknown future effects of climate change.</p> <p>The LNP recommends that new open spaces should deliver multiple benefits and not be limited to a single use e.g. playing field. The</p>	<p>Support noted and welcomed.</p> <p>Amend paragraph 4.1 to include 'and there is an opportunity to</p>

	<p>Aquagreen Initiative has demonstrated locally how open spaces can deliver for amenity, recreation, flood alleviation and biodiversity, and this holistic approach should be advocated with any future developments, regardless of size.</p> <p>Therefore the reference to the integration of sustainable drainage within new developments is supported.</p> <p>The LNP welcomes the promotion of green infrastructure within the SPD, linking with the Local Plan Policy KAAP5. This will require strategic understanding of the range of natural assets that are required within the green infrastructure of Hull. The LNP is developing a natural capital investment framework across Hull which should support the development of a green infrastructure strategy in the city.</p> <p>The LNP supports the inclusion of policies where open space contributions will be liable for all developments where there is a shortfall of open space provision nearby. They recognise that on-site open space provision is not always possible and agree with the proposal to require a financial contribution in lieu of off-site open space or the maintenance of existing open spaces.</p>	<p>accommodate more than one type of open space within any area of new open space' after the sentence 'This description outlines what an ideal example of each type of open space would be'.</p> <p>Support noted and welcomed.</p> <p>Support noted and welcomed.</p> <p>Support noted and welcomed.</p>
<p>Yorkshire Wildlife Trust</p>	<p>Yorkshire Wildlife Trust supports the proposals of the SPD.</p> <p>Yorkshire Wildlife Trust would like to see consideration given to encouraging developers to incorporate ecological features within open spaces to create an ecologically coherent network across the city. These can be achieved through varying mowing regimes or the planting of wildflower seed with a single annual mow for example. The Trust would be happy to provide advice on suitable schemes.</p> <p>Yorkshire Wildlife Trust would encourage developers to utilise native species in ornamental planting and areas of new open space.</p>	<p>Support noted and welcomed.</p> <p>Add a new paragraph after 4.1 and add the following text 'When designing proposed new open spaces within housing schemes developers are encouraged to consider incorporating ecological features within the maintenance of them. Yorkshire Wildlife Trust can provide additional advice on suitable schemes and can be contacted via their website at <a href="http://www.ywt.org.uk">www.ywt.org.uk</a>.'</p> <p>After the above text add 'And in such new open spaces (including ornamental planting areas) designs that utilise native species whenever possible</p>

	<p>Yorkshire Wildlife Trust would like to see the consideration of all developments to support the creation of green infrastructure and corridors which would ultimately maximise the potential of ecosystem service for the city.</p> <p>Overall the Yorkshire Wildlife Trust has no objections to the proposals, but they feel the document could be further strengthened in order to meet the national aims set out in the NPPF to achieve a net gain in biodiversity.</p> <p>The NPPF has recently been updated and all documents should reference the new guidance to ensure they meet current guidance before they are published.</p>	<p>will be encouraged.'</p> <p>Comments noted.</p> <p>Add a new paragraph after paragraph 3.2 and add the following text 'The revised NPPF also adds in paragraph 170 that "planning decisions should contribute to and enhance the natural and local environment by minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures".'</p> <p>Amend paragraph 2.1 by replacing 'published in 2012' with 'originally published in 2012 and revised in July 2018'</p> <p>Amend paragraph 3.2 by:</p> <p>i) replace 'Paragraphs 73 and 74 of the NPPF, Paragraph 73 states' with 'paragraph 96 of the revised NPPF which states'.</p> <p>ii) replace "Access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and wellbeing of communities. Planning policies should be based on robust and up-to-date assessments of the need for open space, sports and recreation facilities and opportunities for new provision. The assessment should identify specific needs and quantitative or qualitative deficits or surpluses of open space,</p>
--	---	---

		<p>sports and recreational facilities in the local area. Information gained from the assessments should be used to determine what open space, sports and recreational provision are required". - taken from the 2012 NPPF with "Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities. Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate." - taken from the revised NPPF (July 2018).</p>
--	--	--