

Adoption Draft City Centre Key Sites Design Guide – Consultation Statement



Supplementary Planning Document 13, March 2019



Executive Summary

1. This report details the results of consultation that occurred from October 16 and ended November 30 2018, on the draft City Centre Key Sites Design Guide Supplementary Planning Document (SPD), in accordance the requirements set down under the Town and Country Planning (Local Planning) (England) Regulations 2012. This report details consultation measures undertaken, feedback and the Council's response.
2. The following are headline messages from the feedback received from over 500 people visiting the Trinity Market event including 70 investors attending the launch and over 50 individual written responses detailed in **appendix A on pages 14 – 20 below**. 5 formal responses have also been received. The City Council's response to these is in italics. Amendments to the draft SPD are further outlined.
 - General support and positivity for regeneration of the city centre and for efforts in bringing this about – *this is welcomed and the City Council continues to press site assembly and marry up developers to site opportunities.*
 - Some concern about the scale of anticipated residential growth (2,500 units) and whether this can be delivered – *anticipated supply provides scope for investment in properties in various city centre sites but developer and home buyers demand for quality city centre development remains high.*
 - Issues raised about future growth prospects for retail given the national picture and the impact of this on the city centre including the 're-purposing' of Whitefriargate – *greater diversity and mix of uses is the way forward and consolidation of the retail core is needed. The city centre undergoes continual change but it has to compete for investment with other centres and out of town locations. The SPD deliberately seeks to diversify uses across the city centre and only favours retail in 2 of the 12 sites.*
 - Concern about parking and traffic impacts including A63 proposals on future investor aspirations/intentions – *there will be a need to service development accordingly and mitigate impacts (including the A63 proposals) as best able. Parking requirements sought for proposals within the city centre are to be relaxed to 20% of the normal standard resulting in amendment to the indicative drawings.*
 - Comments were made about the indicative designs of certain sites in context with surroundings including compatibility of East Bank, buildings on Portside site being too high, retention of the BHS mural wall and dislike of cladding which seems the current approach – *comments are welcomed but design detail will come through in each case on the submission of planning applications and assessed in terms of how well proposals address the design parameters of the SPD including site context. The SPD is to be amended more generally to reflect the building heights as being maximums and to outline the plans shown are indicative only. The*

intention is to avoid these being the only design solution and not dissuade creativity. The Portside Site 3 is to be amended to show 7 storeys as being the maximum along with amendments to statements concerning designs reflective of the local context in relation to heritage assets, specific to East Bank, High Street, Albion Square, Blackfriargate and Humber Quays.

- Historic England made a significant number of detailed comments on sites and suggested a need for a city centre masterplan and/or merging of the supporting document in providing a context for the design guidance, and in particular how the surrounding heritage context should influence the design of these key sites and aspects - *The Council has amended the design statements in certain cases to better reflect the importance of heritage assets. A short user friendly design guide that does more of a 'what is possible' rather than 'how it should be done' task, to enable informed and innovative design thinking to come forward. A short user friendly design guide is considered a more useful document to inform and enable innovative design thinking to come forward over a detailed masterplan which could constrain design options. However, a number of changes are proposed to the draft wording in the SPD, as detailed in appendix C on pages 35 to 85 to this report.*
- British Land PLC, with interests at St Stephens, generally supports the wording within the SPD but wanted to remove the greenspace referenced in site 10 (Colonial Street) – *the City Council acknowledges the private ownership of this urban greenspace but no changes are put forward as a consequence. It is not the role of the SPD to re-allocate sites in the Local Plan.*
- Wykeland would prefer a reference to the preferred design of an office scheme on Blackfriargate site 2, to reflect the contemporary nature of the buildings in the vicinity but it should be individual in its design - *The City Council acknowledges these suggestions and guidance should be amended to reflect the local character of this part of the Conservation Area next to Myton Bridge.*
- Highways England made a number of comments with concerns about specific sites, but mainly in terms of the direct and cumulative impacts of the indicative proposals on the A63 (**reported in appendix B below on pages 21 - 34**) – *The City Council acknowledges the proposals outlined in the SPD are indicative and that detailed traffic assessments will be needed but the uses and mix are already agreed as part of the approved Local Plan. However, there is scope to promote more sustainable development in the city centre because of the high degree of accessibility and to address other imperatives like air quality. 20% of the city wide parking standard is therefore proposed in the accompanying Parking Strategy SPD.*
- The Environment Agency responded and offered advice on flood risk for the sites (**reported in appendix D below on pages 86 – 88**). In general the preference is for upper storeys to be used for residential purposes and sleeping accommodation. Because the Ice Arena site is not allocated in the Local Plan for housing, a sequential and exceptions test approach is required and floor levels should be raised. – *Flood resilience will be an important aspect of design for new development given the risks involved. The Ice Arena site is subject to Local Plan policy requiring additional tests to be undertaken as part of submissions for planning consent*

but it will be made clear this is the case through revisions to the SPD. In addition the Ice Arena site is included in a RIBA design competition focused on water resilient design.

Introduction and purpose of the SPD

1. The purpose of the SPD is to expand and explain the rationale for key sites outlined in the recently adopted Local Plan. The intention is to highlight the investment opportunities available to developers and provide a sense of direction for work in bringing forward proposals and other public realm/infrastructure improvements, as part of this wider plan. A Delivery and Investment Plan that looks to the next 5 years and a Prospectus provides further marketing details. Although the Local Plan is important in providing greater certainty and reducing risk for developers in allocating land and/or land use mix, deliverability measures are required to bring sites forward. This includes measures such as site assembly, public funding to remove development barriers, contamination reports and feasibility work.

Consultation measures

2. Measures undertaken in seeking a response to the SPD included:
 - letters and email targeting statutory consultees, land owners, developers and their agents, requesting comments by the 30 November 2018;
 - a week long exhibition beginning Tuesday 16 October to Saturday 20 October (including Thursday evening) open during normal shopping hours in the local indoor market place, located in the city centre;
 - local press releases;
 - use of a bus in marketing the sites in connection with a parking strategy consultation, over 2 days, and in reaching local communities outside of the city centre;
 - the publication of material on the Council's web site; and
 - Press Notice placed in Hull Daily Mail prior to the exhibition event.
3. The exhibition was commissioned and jointly managed by the Council's Major Projects and Planning Services teams. This ensured efficient use of Council resources and targeting of investors who would deliver most of the development projects outlined in the Local Plan. The exhibition took the form of information boards relating to 12 Key sites and a plan of this and the release of a 3-D fly through model DVD with a soundtrack. Feedback forms were made available for people to return comments in writing.
4. Developer interest has also been obtained at national level events including at Revo. This is the largest gathering of its kind in the UK that brings together key decision makers and businesses that together create, deliver, operate and occupy great places to live, work, shop, eat and entertain.

5. A focus on city centre renewal by the Council has resulted in the production of marketing material that is aligned to the Local Plan. A number of documents completed for the exhibition relating to the delivery of key sites that helps underpin the Local Plan included:
- a City Centre Key Sites Prospectus
 - City Centre Delivery and Investment Plan 2018 - 2023
 - City Centre SPD Supporting document

Feedback

6. Attendance at the exhibition and the feedback received from the exhibition was highly positive.
7. The exhibition launch was attended by over 70 developers, land owners or their agents, at a 'meet and greet' event. More details of the feedback from this event are provided below and grouped under the main headings relating to renewal approach, housing, retail, and site specific issues.
8. The launch event attracted national and local media attention including TV and radio coverage. As a likely consequence the event resulted in a high turn out of local people totalling well over 500 throughout the week, including 150 on day 1, day 2 – 50, day 3 – 150, day 4 – 85 and day 6 – 250.
9. Feedback from conversations with individuals including broad issues grouped around the following topics:

Approach to renewal

- Generally supportive comments in setting out a clear direction of travel and plan for the city centre – the city needs this aspiration on the back of the City of Culture.
- General positive support for the efforts to renew the city centre including getting more people to live here – but perhaps need a focus on who we are attracting to the residential offer.
- Support given for the long term approach needed to realise regeneration of parts of the city centre.
- Sites will require public money to make them realisable and perhaps business rates are not helping (more hurting) retailers and others.
- Need to monitor and report on what is happening and what has been achieved.
- Need to create jobs/business in order to support the emerging housing market.
- Much more thought is needed about public transport and cycling.
- What prospects are there for a tram linking the interchange with the Old Town or the Cruise terminal?

- The Old Town could be reinvigorated through providing river cruises from Minerva Pier.
- Some concern that proposals will not happen because of the dependency culture/lack of jobs and people not wanting to live in the city centre.
- What about other areas of the city including Beverley Road, Spring Bank and Anlaby Road, that also need investment?

Housing related issues

- Concern that given the scope for a further 2,500 dwellings across numerous sites – there will be competition between sites that may well result in a state of limbo.
- If we are attracting families then we need facilities to support provision within the city centre.
- Need to ensure provision for businesses is made as part of the plan.
- Concern about the return of the buy-to-let market in the city centre including mismatch to economic cycles.
- Some suggested a focus on particular projects that will make a real difference.
- Is there a need for a developer consortium to underpin the managed renewal of the city centre?
- Impact and uptake of Beal Homes at the Fruit Market has been impressive but other sites might need to offer something else – not just 2 and 3 bed properties.

Retail related issues

- Concern about the potential for further large scale retailing in the city centre and impact on Whitefriargate.
- Whitefriargate needs to have a plan with identified future purpose, but with regard to the much wider city centre offer.
- May be need to roof-over (or part) Whitefriargate to make it attractive for seating/visiting but without obscuring the architecture.

Traffic/Parking issues

- Concern about parking provision in serving existing and new uses – will there be sufficient in appropriate locations?
- What will traffic impacts be?
- What will be the impact of the A63 upgrade on the renewal projects – concern this will dampen developer interest?

Site specific issues

- Some were keen to retain the 3 ships mural as an important part of the heritage of the city.

- Support given to the maritime related projects including cruise terminal and the museum – important in underpinning tourism in driving the local economy.
 - Some points made about impacts of noisy industries close to new housing – the heavy industry was here first - so should not be pushing industry away!
 - Potential for funding contamination reports that might unlock development potential of Site 11 on Anlaby Road, but there may well be other contamination issues on other sites.
 - Concern about the location of the Cruise Terminal for residents of Victoria Dock.
 - Need to protect/recover any archaeology from sensitive locations and beware of unexploded ordnance.
10. Over 50 response forms were received as detailed in Appendix A, mainly from local residents or those visiting the Trinity Market including issues concerning certain sites:

Albion Square

- addressing the architectural impact of the Albion Square scheme which seems to incorporate 3 different styles in a small area – the whole appearance seems confused;
- it's important to get the BHS building right including keeping the façade as part of the new scheme;
- need to be creative with innovative architecture;
- not impressed with the proposed boxes at Albion Square to replace the existing ones. The previous design with glazed frontage was much better.

Whitefriargate

- Whitefriargate and Anlaby Road are in need of physical regeneration, so should be considered alongside the city centre;
- Whitefriargate needs further attention including making more (interpretation and explanation) of Beverley Gate and market stalls being installed;
- Whitefriargate could have a 'Hollywood Stars' strip using the names of famous people born in Hull, to immortalise their links to the city and attract people to the street to view this; and
- Whitefriargate should retain the views of its architecture especially to the upper floors, so do not put a roof over it.

East Bank

- Riverside proposals need to complement the size and character of existing older buildings, and should not be oversized blocks with unused space around them;

- supportive of the East Bank apartment scheme given the views from my property across the river.

Colonial Street

- buildings need to have a human scale at street level and frontages set back from the street, not blank walls at the back edge of the footpath.

Portside

- concern about the loss of open views to the Humber through the marina area, by developing site 3;
- Marina area renewal needs to be carefully considered in design terms. 9 storeys at the Marina is far too high;
- Portside site next to the Marina should not be built on and a large block will be hideous in this location – it will detract from the character of the area and what has been achieved on Humber Street.

Dock Office Row

- better if the Dock Office Row scheme celebrated the city's historic vessels and not just fishing;
- Dock Office Row scheme mix is well thought through and sensitive to its location.

Other comments in general

- need for a park and ride to East Hull to help reduce vehicles travelling into/from the city centre;
- impressed by the scope for the designs of each site in giving an impression about what can be achieved;
- need a mix of developers to realise the schemes;
- don't need any more corporate hotels;
- proposals appear exciting opportunities and something to address rundown parts of the city centre;
- need to include access for all on all sites;
- prospects for further infrastructure should families move in including schools, play areas, doctors etc;
- approve of the suggestions about design which are excellent but these need delivering;
- need to ensure parking and access for vehicles to attract business to areas;
- need to retain the maritime character of the area and buildings not just modernist clad buildings that will date quickly;
- designs must be in keeping with the Old Town building style and not homogenised;
- bringing people back to the city centre is paramount;

- parking is an important aspect of renewal;
- bringing further people to live in the city centre will bring dividends in terms of additional jobs;
- how many new dwellings will be affordable?;
- concern about the amount of new retail space being proposed despite the national picture;
- parking for each of the sites appears inadequate but most will own cars;
- more should be made of the Riverside sites and use the river/estuary for boat trips to attract tourists;
- need more greenspaces in the city centre;
- more needs to be made of the city's great maritime heritage;
- will there be retirement apartments as part of the residential mix?;
- the Cruise terminal will need significant new infrastructure to serve it and might divide the Old Town in a way similar to the A63; and
- progress on major sites is needed quickly plus progress should be posted on a regular basis.

11. More detailed comments were from 5 formal responses to the SPD. The key messages from this are as follows along with City Council response:

- Wykeland PLC suggested the range or mix of uses (including residential) detailed are supported for Key Site 2 – Blackfriargate - and it is agreed there is an opportunity for a statement building with quality public realm and landscaping. Should an office scheme come forward then it should reflect the contemporary nature of the buildings in the vicinity but it should be individual in its design. The reference to multi-storey car park (to include 5m x 2.5m bays) here is needed given the increasing pressure on parking in the Fruit Market area, likely to get worse as development progresses – *The City Council acknowledges these suggestions but the Local Plan and design guidance revisions covers the points raised.*
- Historic England made a significant number of detailed comments on sites (reported in Appendix B) and suggested a need for a city centre masterplan and/or merging of the supporting document in providing a context for the design guidance, and in particular how the surrounding heritage context should influence the design of these key sites and aspects. There was a concern the guidance was overly vague and therefore did not serve as the best way to maximise the full potential the city centre has to offer, and likely cause harm to elements that contribute to its distinctive character - *the City Council has previously developed a detailed masterplan for the city centre and a series of development briefs. Most of the principles from these have been taken forward into the SPD and further detail is provided in the Supporting Document. The former masterplan and development briefs have therefore been superseded. The current approach is considered sufficient to guide potential investors as well as informing them of unique sensitivities. Over prescription may well deter potential investors and creative design solutions although there may well be a balance in providing information upfront and in avoiding the promotion of development that just meets the standards. It is considered there is sufficient steer for future development proposals given in the SPD although the status of the*

Supporting Document will be clarified in being used in a way that requires consideration by applicants for planning consent. Requirements of the Local Plan are also referenced, so these serve as corner stones to achieving development that is compatible to its surroundings.

There is scope to merge documentation to make 'site context' more readable but this is considered would result in significant work for limited gains. A further option would be to have individual SPDs for each of the sites. The information is separated across numerous documents at the moment. The intention was to have a short marketing document that looks to 'what is possible' rather than 'to do it like this' given constraints and the opportunities but it will be for others to put forward proposals that conform to these and the requirements set out in the Local Plan, to enable and inform innovative design thinking to come forward. However, a number of changes are proposed to the wording of the SPD to clarify the approach and important heritage asset considerations.

- *British Land PLC, with interests at St Stephens, generally supports the wording within the SPD in relation to Key Site 10 which references the site's relationship with St Stephen's. However, the area of urban greenspace referenced forms part of the St Stephen's site, and whilst currently forming open space this could become a development area in the future, subject to meeting relevant Local Plan policy. As such our client is seeking an amendment to part c. to the guidance within the SPD to ensure the development of Key Site 10 does not affect potential future development opportunities at St Stephen's – *the City Council acknowledges the ownership of this space.**
- *Highways England made a number of comments with concerns about specific sites, but mainly in terms of the direct and cumulative impacts of the indicative proposals on the A63 (reported below in Appendix C) – *The City Council acknowledges the proposals outlined in the SPD are indicative and that detailed traffic assessments will be needed but the uses and mix are already agreed as part of the approved Local Plan. However, there is scope to promote more sustainable development in the city centre because of the high degree of accessibility and to address other imperatives like air quality. 20% of the city wide parking standard is therefore proposed in the accompanying Parking Strategy SPD.**
- *The Environment Agency responded and offered advice on flood risk for the sites. In general the preference is for upper storeys to be used for residential purposes and sleeping accommodation. Because the Ice Arena site is not allocated in the Local Plan for housing, a sequential and exceptions test approach is required and floor levels should be raised. – *Flood resilience will be an important aspect of design for new development given the risks involved. The Ice Arena site is subject to Local Plan policy requiring additional tests to be undertaken as part of submissions for planning consent but it will be made clear this is the case through revisions to the SPD.**

City Council response to the feedback

12. *In general terms it is pleasing to see the positive nature of the responses to the event and to the value of the planning system to regeneration. The Council's response is broadly outlined below.*
13. *The mix and range of uses sought for each site of the 12 Key sites (and the Cruise terminal) are already endorsed in the Local Plan. There is flexibility in terms of the uses that would be acceptable in each of these locations.*
14. *The Local Plan determines future estimated retailing, housing, leisure needs based on recognised approaches accepted by a planning examiner. The Local Plan puts forward the best locations in realising these needs, but the development industry needs to respond to the positive approach and steps being undertaken by the City Council to unlock the development potential of certain sites.*
15. *City centre residential use seems to have been a particular issue of concern. There is a supply of over 2,500 units identified in the Local Plan, where opportunities exist to attract (in particular) young or older generations to the city centre in taking advantage of a diverse (and growing) mix of nearby leisure and cultural uses.*
16. *Whitefriargate seems a particular concern, which is also of concern to the Council but is not something out of the ordinary given the current trends in retailing experienced throughout the UK. The City Council is working with land owners and Historic England to determine the best way forward but in a way that seeks to make the most of its character.*
17. *The SPD provides a basis to further secure development and designs which are compatible with local characteristics, without being unduly prescriptive.*
18. *The consultation undertaken on the SPD went some way to further explain the approach in the Local Plan (and other marketing tools produced by the Council) about intended preferred land uses and the mix for certain sites in the city centre. The SPD gives a design steer useful for applicants in seeking planning consent for each of 12 key development sites but there is a degree of flexibility. Historic England say there is too much flexibility and as a consequence aspects of the design requirements are accordingly amended.*
19. *The comments received were mostly unrelated to design, which was the purpose of the SPD. Comments were received about the marketing documents put out for consultation at the same time as the SPD, which is itself a marketing tool. Perhaps the consultation event was not sufficiently focused on design enough to persuade people to make comments solely on this issue. However, there were wider benefits in taking a more holistic approach to marketing the city centre development opportunities.*

There are advantages in marketing what is being done to improve the city centre in making it more attractive to investors and visitors.

20. *There seemed genuine interest and support for the proposals for regenerating the city centre. Investors who attended the opening event were keen to support initiatives and many are involved in the renewal of the sites in any case. There are challenges about taking these opportunities further in delivering actual projects leading to physical renewal. There are challenges about ensuring the city gets the right developers prepared to invest in a way that is sensitive to the context of the site and its surroundings.*
21. *More needs to be done to persuade and attract investors to build in the city centre. A further recent Housing Renewal conference held in the city centre (27 November) further promoted opportunities. Further monitoring of projects and enquires will be important in understanding needs and aspirations. This might enable a more targeted approach in matching opportunities with developer interests.*
22. *The SPD feature statements about the design challenges facing the development of sites. Indicative design solutions appear in the form of site layouts and suggested building heights/massing and parking requirements. These were intended to show 'what is possible' rather than 'how it should be done'. Historic England seem to favour greater prescription.*
23. *Some of the comments received were considered important to result in suggested amendments to the draft SPD as detailed below. As a consequence, a further period is required (in meeting requirements specified in the regulations) followed by a 6 week notification period before the SPD is considered as being made and endorsed by the City Council.*

Appendix A – Written responses from attendees at the Trinity Market

Council reference	Part of the SPD	Details of respondent	Details of response	<i>City Council response to consultation</i>
1	Albion Square	Local resident	Need to consider the architectural impact of 3 different styles in a small area. Current proposals seem confused.	<i>Proposals will need to grapple with the particular sensitivities of the site but the Local Plan and the Conservation Area status provides the basis to assess design and what is considered as being acceptable to the Council.</i>
2	All	Student	Will trickle down approach to regeneration work in the way depicted?	<i>The City Council is addressing regeneration through various means including using its land assets and the planning system to deliver lasting change for the future benefit of the city and its residents.</i>
3		Local resident	Whitefriargate and parts of Anlaby Road are priorities for regeneration but projects in the city centre are supported.	<i>Support is welcomed and the city centre is the top regeneration priority.</i>
4	East Bank, Wincolmllee, Dock Office Row and High Street	Local resident	Riverside schemes should complement what is nearby in terms of the size and character of existing older buildings and not create oversized blocks with limited space around them.	<i>The Local Plan and design guidance provides the framework in capturing opportunities that are sensitive to the heritage assets and specifics of the site.</i>
5	General	Local resident	Building design should have a human scale at street level and be set back from the street/footpath rather than blank walls rising from the tarmac.	<i>Designs should respect the human scale but the city centre location affords the opportunity for more intensive uses and mix.</i>
6	General	Local resident	Need a blend of developers and no more corporate hotels.	<i>A range of developers are likely to undertake the development of sites. Hotels are a particular aspect to regeneration and the market will determine proposals.</i>
7	General	Local worker	Proposals are very exciting and	<i>Support is welcomed.</i>

Council reference	Part of the SPD	Details of respondee	Details of response	City Council response to consultation
			build on the success of the city of culture.	
8	General	Local resident	Need to make provision for disabled people in housing sites in addition to making infrastructure provision for families, such as schools, doctors, etc	<i>The Local Plan policy requires accessible designs. The exact nature of uses that come forward will determine the nature of further supporting infrastructure, but it is likely that future accommodation will be mainly for younger and older people wanting access to a range of city centre type uses.</i>
9		Local resident	Designs should change as development sites come forward.	<i>Designs will change as developer needs come forward. The SPD puts forward indicative design solutions but much more detail will be needed in addressing the challenges and opportunities stated. The Local Plan provides the key principles and requirements for uses and/or mix that brings a high degree of certainty for future investors.</i>
10		Local resident	All schemes are excellent and worth supporting provided they happen.	<i>Support is welcomed.</i>
11	Fruit Market area	Local employer	Excellent designs but thought needs to be given to private cars in accessing residences.	<i>Support is welcomed and thought is being given to parking requirements for the whole of the Fruit Market.</i>
12		Local resident	Need to retain the maritime heritage of the city not just modernist clad buildings that seem to be current fad that will age quickly.	<i>Designs should reflect local character or can be contemporary but this is depended on the context of the site and what surrounds it.</i>
13	East Bank	Local resident	Supportive of designs for East Bank and in the area generally but can't wait for works to begin.	<i>Support is welcomed and the City Council is working hard to progress delivery.</i>
14		Local employer	Designs must be in keeping with	<i>Designs should reflect local character or can be</i>

Council reference	Part of the SPD	Details of respondee	Details of response	City Council response to consultation
			the local character and buildings should not be homogenized.	<i>contemporary but this is depended on the context of the site and what surrounds it.</i>
15		Local resident	Impressed with the designs and excited about the prospects for change.	<i>Support is welcomed and the City Council is working hard to progress delivery</i>
16		Local employer	Need to consider the impact of schemes on infrastructure and parking.	<i>The Local Plan requires detailed consideration of traffic and parking impacts.</i>
17	Albion Square	Local resident	BHS building and treatment needs to be right, which should remain and be the centerpiece to the scheme, plus a need to be innovative/creative with the designs.	<i>The BHS building provides challenges should it be retained but the indicative proposals seek retention of parts of this. Innovative and/or creative design is sought for all the sites where development is proposed.</i>
18		Local resident	All the sites are in dire need of development and must be about bringing people back into the city centre. Parking is important feature of this.	<i>These long term vacant sites require land assembly and their re-use/renewal largely seeks the attraction of local residents. The Local Plan requires detailed consideration of traffic and parking impacts.</i>
19	Portside site 2	Local resident	Buildings on this site would have an adverse impact on views across the Marina toward the Humber so proposals should enhance the view or the site should not be developed.	<i>The indicative proposals seek development that aligns to the agreed Local Plan but it is agreed to moderate the building heights.</i>
20		Local employer	No particular comments to make on the designs but the proposals should provide some interest and raise development potential.	<i>Support is welcomed.</i>
21		Local employer	Developers should involve experts in developing public realm works.	<i>The Local Plan requires public realm work, if appropriate, in a way that complements designs.</i>

Council reference	Part of the SPD	Details of respondee	Details of response	City Council response to consultation
22		Georgian Society	Whitefriargate is main concern but keen to see proposals come to fruition.	<i>Whitefriargate is a key access to the Old Town and shopping street in its own right. A plan is being worked on to address its future re-purposing.</i>
23		Local employer	Keen to see redevelopment opportunities on Whitefriargate happen.	<i>As above, but the City Council is also working hard in making progress through offer of grants to land owners to improve the property in a sensitive way.</i>
24	East Bank and Portside	Local resident	Supportive comments made for designs for these schemes.	<i>Support is welcomed.</i>
25		Local resident	Interested in designs including reference to disabled access.	<i>Support is welcomed plus access for all issues are required through Local Plan policy.</i>
26		Local resident	Proposals should enhance the area in general and bring further employment and people to live in the city centre.	<i>The Local Plan and SPD seek a mix of further business, retail, leisure and housing uses – in combination these will bring additional people into the city centre.</i>
27		Local resident	Supportive of designs but these need to happen and soon.	<i>Support is welcomed and the City Council is working hard to progress delivery</i>
28	Whitefriargate	Local resident	This is the gateway to the Old Town and is in need of improvement perhaps by explaining Beverley gate better or having stalls in the centre to enliven the space.	<i>Whitefriargate is a key access to the Old Town and shopping street in its own right. A plan is being worked on to address its future re-purposing.</i>
29		Local employer	Interested in the potential for the cruise terminal and whether design should reflect local maritime heritage of the city centre.	<i>The Local Plan and design guidance provides the framework in capturing opportunities that are sensitive to the heritage assets and specifics of the site.</i>
30		Local employer	Need to conserve the historic heritage of the place through appropriate designs but also to	<i>The Local Plan and design guidance provides the framework in capturing opportunities that are sensitive to the heritage assets and</i>

Council reference	Part of the SPD	Details of respondee	Details of response	City Council response to consultation
			achieve housing which is affordable for more than the few.	<i>specifics of the site. It is envisaged that affordable units will form part of the mix but the precise details have yet to be determined.</i>
31		Local resident	Difficult to renew places given the context of retail sales decline in the UK.	<i>Additional retailing will be a challenge to achieve in the city centre given the national picture and recent trends, but other uses are being sought to make the city centre a more vibrant and vital place.</i>
32		Local resident	Need to ensure there is parking for those living in apartments but that schemes are accessible by other transport modes.	<i>The city centre affords access to a range of transport modes but car parking can be provided should developers want this to attract potential occupiers.</i>
34	Dock Office Row	Local resident	Opportunities for this design should extent to include other than just fishing industry exhibits at the Maritime Museum.	<i>The proposal looks to the city's historic past and the fishing industry is deserving of a museum dedicated to this. There are other functions that form part of the 'museum quarter'.</i>
35	Port side	Local employer	Area around the site should be sensitivity designed.	<i>The Local Plan and design guidance provides the framework in capturing opportunities that are sensitive to the heritage assets and specifics of the site.</i>
36		Local resident	Unique architecture of Whitefriargate should be conserved so there is no need for a roof over it, as this would spoil the views of upper storeys.	<i>The Local Plan and design guidance provides the framework in capturing opportunities that are sensitive to the heritage assets and specifics of the site.</i>
37		Local resident	Best use should be made of the city's maritime past.	<i>The Local Plan and design guidance provides the framework in capturing opportunities that are sensitive to the heritage assets and specifics of the site.</i>
38		Local resident	Need for more greenspaces in the city centre that form part of	<i>Publicly accessible urban greenspace is limited in the city centre (only at Queens Gardens) but</i>

Council reference	Part of the SPD	Details of respondee	Details of response	City Council response to consultation
			the development proposals. There is little or no greenspace.	<i>public realm is being suggested as part of indicative designs.</i>
39	Portside	Local resident	Not supportive of development here as it will detract from the Marina and heritage aspects of the area.	<i>The Local Plan allocates the site for development although the City Council owns it.</i>
40		Local resident	Potential for a Hollywood boulevard of stars but based on famous Hull people in bringing people to the area.	<i>Whitefriargate is a key access to the Old Town and shopping street in its own right. A plan is being worked on to address its future re-purposing.</i>
41		Local resident	Wants to see retirement living in the city centre, and not just for younger generations.	<i>The exact nature of uses that come forward will determine the nature of further supporting infrastructure, but it is likely that future accommodation will be mainly for younger and older people wanting access to a range of city centre type uses.</i>
42	Dock Office Row	Local resident	Impressive initiative that is sensitive to the heritage of the area.	<i>Support is welcomed.</i>
43		Local resident	Interested in potential housing in the city centre and just need to make sure this happens.	<i>Support is welcomed and the City Council is working hard to progress delivery.</i>
44		Local resident	Cruise terminal will need significant infrastructure to handle movements in the location planned.	<i>Proposals will need to determine the exact needs as the cruise terminal is progressed.</i>
45	Albion Square	Local resident	Albion Square renewal is vital to the future of the city centre.	<i>Albion Square does form an important aspect in bringing more activity to the city centre in conjunction with a car park to serve nearby shopping needs, combined with a new ice arena and housing.</i>
46	East Bank	Local resident	Make more of the site next to the	<i>The Local Plan and design guidance provides</i>

Council reference	Part of the SPD	Details of respondee	Details of response	<i>City Council response to consultation</i>
			river.	<i>the framework in capturing opportunities that are sensitive to the heritage assets and specifics of the site.</i>
47	Humber Quays	Local resident	Make the most of this site next to the River Humber.	<i>The Local Plan and design guidance provides the framework in capturing opportunities that are sensitive to the heritage assets and specifics of the site.</i>
48		Local resident	Impressed with the positivity and plans for the future.	<i>Support is welcomed.</i>
49	Albion Square	Local resident	Not keen on the ugly boxes proposed for the site in the indicative designs.	<i>These are indicative designs and more detail is to follow.</i>
50	Dock Office Row.	Local resident	Keen to see the Arctic Corsair being conserved as part of the renewal of Dock Office Row.	<i>Support is welcomed.</i>

Appendix B - Letter from Highways England

1. On behalf of Highways England, CH2M has undertaken a review of a number of documents pertaining to the Local Plan for Hull City Centre. These documents are the 'City Centre Key Sites - Supporting Information' Draft Supplementary Planning Document [SPD] (dated 2018), the SPD13 'Consultation Draft City Centre Key Sites Design Guide' (dated August 2018) and the SPD5 'Hull City Centre Parking Strategy' [PS]. The first two of the aforementioned documents were provided by Hull City Council [HCC] to Highways England alongside a letter dated 3rd October 2018, which invites comments on the documents by 30th November 2018. Highways England was also separately consulted on SPD5 by HCC, in an Email dated 6th November 2018.
2. Comments are provided below under headings that relate to those used in the 'City Centre Key Sites- Supporting Information' SPD and the SPD13 'Consultation Draft City Centre Key Sites Design Guide Document'. An assessment of SPD5 (the PS) is also made at the end of this technical memorandum [TM] under the header 'Hull City Centre Parking Strategy'.
3. It should be noted only the information in the above named documents which is relevant to Highways England is commented upon within this TM.

Background

4. The Local Plan [LP] sets out the key city centre sites put forward for proposed development and suggests a mix of uses for them. The supporting documentation describes how each site can be developed and notes some of the design challenges to be faced. In total there are 12 key development sites for delivery in the city centre. The PS identifies how parking across the city centre will be managed.
5. The principal concern for Highways England remains the safe, functional and efficient operation of the Strategic Road Network [SRN], and consequently, this review focuses upon the proposed key development sites and parking strategy elements that may impact on the SRN around Hull city centre, namely the A63 and A1033. Highways England needs to understand the traffic implications from the key development sites and the PS, in order to ascertain whether there may be any potential for impact at the SRN, particularly at peak hours. Furthermore, identifying and understanding the varying quantum and nature of the proposed sites and proposed parking remains key for Highways England, especially if further mitigation measures will be required on the SRN to accommodate the traffic generation of the new developments.

SPD13 Consultation Draft City Centre Key Sites Design Guide

6. At Paragraph 2.2 of the SPD13 document, HCC outlines a number of relevant policies from the LP (2017) which have been used to provide design-based guidance for each of the city centre allocated sites. Each preference of uses for the sites are supported by a policy as found in Table 1 of the SPD document. CH2M is satisfied that a range of policies from the LP have been included for consideration in the appraisal of the key sites and particularly welcomes reference to Policy 31 on City

Centre Parking.

7. Paragraph 2.8 of SPD13 notes that residential use is a key land use sought on sites within the City Centre, equating to around 2,500 units, as indicated in the LP. Highways England would wish to be involved in early consultation in relation to the specific location of these 2,500 residential units, in order to understand if their associated development traffic flows are likely to impact on the SRN.
8. Section 2.9 of SPD13 outlines requirements in relation to the appraisal of traffic impacts associated with planning applications. This section indicates that as part of any application, an appraisal of the transport impact of the development on the surrounding network will be required, to support the development proposals where appropriate. Policy 26 'Location and layout of development' and Policy 27 'Transport Appraisals' (and Appendix B of the LP) set out the requirements and HCC acknowledge the importance of Transport Statements (TS), Transport Assessments (TA) and Travel Plans (TP). Paragraph 2.9 also states that consideration is required of pedestrian and cycle users as set out under Policy 36 'Walking, cycling and powered two wheelers'. The requirements set out in Policies 26, 27 and 36 are supported by Highways England. However, it is stressed that Highways England would wish to be involved in scoping discussions for any TA, TS and TP prepared for the 12 key sites at the earliest opportunity. Where a planning application is likely to generate traffic at the SRN, Highways England will need to ensure that the SRN is appropriately considered within the documents and appropriate mitigation measures identified should it be demonstrated that the application will have a significant impact on the SRN.
9. Paragraph 2.10 of SPD13 identifies that vehicle parking standards including cycle parking are an important consideration for developments, as set out in Policy 31 'City Centre Car Parking' and Policy 32 'Parking Standards for the Local Plan.' It references that the 'Draft Parking Strategy SPD' provides clarity on the levels of parking flexibility to be applied across the city centre. It sets out that a more restricted number of long stay parking spaces will also encourage modal shift and improve air quality. Highways England welcomes the consideration of parking standards and a restriction on long stay car parking. However, parking restrictions will also need to be accompanied with good sustainable transport opportunities to ensure that realistic alternatives to private car use are available. Highways England will also require the trip generation assessment of any development site to correlate with available parking within any TA or TS prepared for planning applications.
10. Paragraph 2.16 of SPD13 makes reference to the A63 Castle Street upgrade and indicates that the scheme will directly affect Key Sites 2 and 5 - Blackfriargate and Myton Street. This section states that it is anticipated that further detailed modelling will be required to ensure proposals work in traffic terms. It should be noted that the A63 Castle Street improvements at Princes Quay Bridge and Roger Millward Way are the first phase of the A63 Castle Street Scheme which started this Autumn, 2018, and are proposed to be completed by Spring 2020. This will improve access for pedestrians and cyclists to cross the A63 and ease congestion and improve safety, which are some of Highways England's key priorities. Highways England would welcome ongoing discussions with HCC in order to understand the associated trip generation and distribution for each of Key Sites 2 and 5. A collaborative approach between Highways England and the local highway authority would be welcomed, in order to work together given the proposals at each of the sites which lie in close proximity to the A63. Should any

development's impact on SRN junctions located within the East Riding of Yorkshire Council [ERYC], Highways England would also be keen to involve ERYC in discussions regarding development impact at the SRN. The remainder of the SPD13 comments on the Key Site Design Challenges for each of the 12 key sites. The sites are listed below:

- Site 1 – Albion Square;
 - Site 2 – Blackfriargate;
 - Site 3 – Portside;
 - Site 4 – Humber Quays;
 - Site 5 – Myton Street;
 - Site 6 – East Bank;
 - Site 7 – Dock Office Row;
 - Site 8 – High Street;
 - Site 9 – Wincolmlee;
 - Site 10 – Colonial Street;
 - Site 11 – Anlaby Road; and
 - Site 12 – Ice Arena.
11. The key consideration for Highways England in relation to each of these sites, is the scale and nature of the proposals, the proximity of the site to the SRN, and the likelihood of vehicle trips to/from the development utilising the SRN during the critical weekday peak hours. The information presented under the Key Sites Design Challenges section of SPD13 does not detail the size of the development proposals for each site or comment on the traffic impact of the proposals and, therefore, although it is useful to gain an understanding of some of the site characteristics, the section is not wholly relevant to Highways England. However, when details on car parking are identified for a specific site within SPD13, this has been considered as part of this review and these are commented on below when commenting on the City Centre Key Sites Supporting Information SPD.

City Centre Key Sites Supporting Information SPD

12. Comments on relevant sections of the 'City Centre Key Sites - Supporting Information' SPD (referred to in the remainder of this TM as the 'Supporting Information SPD') are made under the sub headings below.

Introduction

13. The Supporting Information SPD provides a context appraisal for the City Centre and for each of the sites put forward where

development opportunities exist. The sites are all located in Hull City Centre within a number of different specific clusters of hubs which are defined within the Supporting Information SPD. It is the specific location of developments within the clusters that will be of interest to Highways England and the potential traffic impact from each of the 12 identified development locations. Details of each key site context appraisal are commented upon below, with cross references to the parking information in SPD13 and SPD5 where relevant.

Key Sites Context Appraisals

14. The Supporting Information SPD explains that for each of the 12 key sites identified for the City Centre as part of the LP, the context is provided for design of a particular site or area but without prescribing what should occur there. An appraisal of 12 key sites is made in the subsequent sections of the Supporting information SPD. The 12 sites can be found on Map 1 of the Supporting Information SPD which is replicated below in Figure 1. It is noted that Figure 1 does contain some information in relation to the size of the development proposals where residential uses are identified for a site. This is welcomed and will need to be used in any traffic impact assessment work carried out in relation to the sites.

Highways England's Interests

15. The traffic impact of the 12 key sites is of prime interest to Highways England and the assessments of each of the sites presented in the Supporting Information SPD are commented on below. CH2M has given a high-level consideration of the information presented on the 12 key sites and comments are provided below on whether the individual sites are likely to be of concern to the sections of the SRN in close proximity to Hull City Centre. A summary of the sites which are 'Of Concern', 'Of Possible Concern' or 'Of No Concern' can be found in Appendix A of this TM.

Individual Site Assessments

Site 1- Albion Square/Kingston House

16. This is a 2.1 ha site bounded by Albion, Bond and Storey Streets. The site affords an opportunity for a mix of retail, leisure, restaurants and housing with a central public square. The LP estimates the following proposals for the site:
 - Approximately 20,000 sqm of retail sales floorspace;
 - Approximately 270 dwellings;
 - Ancillary offices; and
 - Decked car park to replace existing surface level parking and standard available car park design at 6 levels including roof top parking will yield approximately 420 spaces.
17. When compared to the HCC Local Plan document (2017), this states that "Albion Square provides capacity for approximately 17,200 sqm gross retail floorspace. This would accommodate 12,000 sqm of projected net retail floorspace needed in the

city". Given the Supporting Information SPD is more up to date, it is assumed that the current proposals are for 20,000 sqm, however, confirmation of this should be provided to Highways England in advance of any assessments being undertaken of the site's traffic impact.

18. With regards to parking and access, details are provided within the Supporting Information SPD in relation to access from the local highway network, which is generally a matter for HCC. Once known Highways England will require information in relation to the proposed access and parking proposals, which will need to be considered within any trip generation and distribution assessment of the proposals as part of a forthcoming TA/TS.
19. For parking, SPD5 indicates that the LP sets out the requirement for a 640-space multi- storey car park (MSCP) and CH2M notes that this differs to the 420 spaces suggested in the Supporting Information SPD. Parking numbers will need to be confirmed in any forthcoming TA and it demonstrated that parking provision correlates with trip generation assumptions.
20. Overall, this site is considered to be 'of concern' for Highways England, given its proximity to the A63/Ferensway and the A63/Great Union Street junctions, combined with the large number of dwellings, retail and office space proposed. Furthermore, the high number of parking spaces indicates that this site could be a large driver of traffic generation. The site's proximity to the A63 / A1033 suggests a significant proportion of trips from this development may utilise this section of SRN, potentially impacting on its operation during peak hours and requiring possible highway mitigation measures.

Site 2- Blackfriargate

21. This 1.5 ha site is located south of Myton Bridge and the east end of the site is defined by High Street as it emerges from the Myton Bridge underpass. This is a key 'gateway site' for the former Fruit Market area. Proposals considered for this site are:
 - A potential pedestrian route and a proposed new frontage;
 - Retain existing substations;
 - Potential for a well landscaped parking proposal as part of the design solution; and
 - A prominent iconic building.
22. In the LP, HCC estimates that approximately 150 dwellings could be provided in this area and mixed- use development "could provide 4,000 sqm of floorspace overall depending on how these are finally configured." The approximate development proposals in terms of floorspace are not provided in the Supporting Information SPD, nor are the number of parking spaces. It is stated that although commercial uses are preferred, the residential nature of the uses to the west could be expanded into the site. Highways England will need to understand the total scale and nature of the development proposals put forward, such as the total gross floor area (gfa) and total number of dwellings, in order to ascertain whether there may be any potential for impact on the SRN.
23. In terms of parking and access, the main vehicular access to the site is from Blackfriargate via High Street. HCC indicates that

access could be to a shared public plaza/parking area and the parking can be provided either in a court and as a surface or as a decked car park. The site also allows the opportunity in part for a MSCP to serve the wider Fruit Market areas and nearby parking spaces could also be made more accessible. Within SPD5, HCC indicates that there is no defined parking requirement for this site, however there is current consent for a temporary (2-year) 170 space surface car park. Given that there is potential for a MSCP, Highways England will require confirmation as to the exact number of parking spaces that will be provided at the MSCP and whether these will be temporary or permanent.

24. This site is considered to be 'of possible concern' for Highways England, given its close proximity to the A63. Trips generated from the site are likely to be focused on the A63/Market Place/Queen Street junction. The site's proximity to the A63 suggests a significant proportion of trips from this development may utilise this section of SRN, potentially impacting on its operation during peak hours and requiring possible highway mitigation measures. Therefore, Highways England will require confirmation of the exact proposals for the site, in order to ascertain the scale of impact at this and any other relevant SRN locations.

Site 3- Portside

25. This is a 0.58 ha site by the docklands and is located at the junction of Wellington Street and Humber Place/Minerva Terrace. Development proposals considered for this site are:
- New business/ small scale retail and/or a residential mixed-use scheme (40 units is indicated) or an alternative would be a visitor attraction such as Sheffield Winter Gardens;
 - Viewpoints e.g. development could also include a 'beacon' building or feature;
 - Provision for outdoor seating;
 - Parking could be made within the building footprint (should residential use feature as part of the proposals) or as a surface car park; and
 - Potential for an expanded car park fronting the Minerva Terrace.
26. At present, the approximate development floorspace details are not provided, nor are the number of parking spaces. As per Site 2, Highways England will need to understand the total development gfa, total number of dwellings and car parking spaces for Site 3, in order to ascertain whether there may be any potential for impact on the SRN. SPD5 indicates that there is no defined parking requirement for this site at present, as parking requirements are only set out for site 1 and 5 and there are consented car parks for site 2, 6 and 10.
27. In terms of parking and access, ideally HCC indicates the space surrounding the buildings should be car free but if required, parking could be incorporated into the building footprint or as a surface car park. Furthermore, an expanded car park fronting the Minerva Terrace could be put forward. Highways England will require confirmation (once known) of the total number of

proposed spaces for the site.

28. This site is 'of possible concern' for Highways England, as despite the small size of the site, it is located in close proximity to the A63. Trips generated from the site are likely to be focused on the A63/Market Place/Queen Street junction. A significant proportion of trips from this development may utilise this section of SRN, potentially impacting on its operation during peak hours. In particular, parking could play a key role in influencing the trip generation of this site and will need to be taken in to consideration within any assessment of the site's traffic impact. Highways England will require further details on the size and nature of the proposals, in order to ascertain the scale of impact resulting from this development.

Site 4- Humber Quays (West)

29. This is a 1.7 ha site located on the Humber front in close proximity to the Hull Marina, at the south western edge of the city centre boundary. Development proposals considered for this site include:
- Allocation for housing with an indicated capacity for 200 dwellings;
 - A minimum access strip of 8 metres wide and a permit for the Environment Agency to access flood defence along the southern boundary of the site;
 - Other uses which can include offices, particularly at ground level which could be at high risk of flooding (if residential use is proposed on the ground floor then the dwellings should be on 2 levels);
 - A promenade could be provided by the river front; and
 - Under croft parking.
30. Highways England will require a more detailed understanding of the floorspaces relating to the non- residential uses, in order to ascertain the site's traffic impact. HCC indicates that proposals will need to maximise the provision of parking towards meeting the parking standard within the site constraints and under croft parking will be the preferred solution. SPD5 indicates that there is no defined parking requirement for this site at present. Further details will need to be confirmed in relation to car parking through the TA process. This site is considered to be 'of possible concern' for Highways England, given its close proximity to the A63 combined with the high number of dwellings proposed. Trips generated from the site are likely to be focused on the A63/Ferensway junction and the A63/Market Place/Queen Street junction. The site's proximity to the A63 suggests a significant proportion of trips from this development may utilise this section of SRN, potentially impacting on its operation during peak hours and may require possible highway mitigation measures. However, the likely trip generation and distribution needs to be ascertained before this can be confirmed.

Site 5- Myton Street

31. This 3.8 ha site is located north of the A63 Castle Street trunk road on the western edge of the city centre. Proposals considered for this site are:

- A music/conference venue on part of the site (east side of Myton Street) along with a MSCP;
 - Possibility for conversion of existing buildings or wholesale renewal including the loss of the former Staples building might open the site for more exciting buildings that may well involve a mixture of retail/leisure/restaurant uses;
 - Possible screening of the western/southern elevations of the MSCP;
 - Prospect for extending retail from Princes Quay; and
 - Opportunities to link into existing buildings e.g. public plaza.
32. It is noted that the proposals for a music/conference venue along with a MSCP were approved in 2016. From reviewing the LP, HCC indicates that “Hull Venue, a 3,500-seat live music and conference venue provides the central focus for this part of the city centre (...) On the west side of the site is the Myton Retail Park (...) a redevelopment scheme for this area could provide around an additional 6,000 sqm of net sales floorspace.” However, no indication of the development gfa details are supplied within the Supporting Information SPD or SPD13, Highways England will need to understand the total scale of development proposals for this site and whether they differ from those in the LP, in order to ascertain whether there may be any potential for impact on the SRN.
33. It is noted that HCC states that the site is affected by the A63 improvements, which include a new at-grade bridge at Mytongate and the road being located in a cutting that extends from the Dalton Street fly-over to Garrison Bridge across the River Hull. It is appreciated that the southern parts of the site are likely to be affected by the road alignment.
34. With regards to access, the Supporting Information SPD states that it is anticipated that vehicular access will be as presently exists including left only to Myton Street, as well as from Anne Street and Osbourne Street.
35. For parking, HCC indicates in the Supporting Information SPD that the changes could just be the possibility to re-clad the MSCP elevations but in SPD5, there is a parking requirement for the venue events complex for 366 spaces as a MSCP. Highways England will require further clarification on the parking proposals for the whole site in order to confirm whether the parking requirement found in SPD5 is suitable. As this site could be a large visitor attraction for concerts or conferences, this could be a significant generator of traffic at event times.
36. This site is considered to be ‘of possible concern’ for Highways England, given its size and that it lies adjacent to the A63, with trips generated from the site likely to be focused on the A63/Ferensway junction. The site’s proximity to the A63 suggests a significant proportion of trips from this development may utilise this section of SRN and may require possible highway mitigation measures. However, if most of the site already has planning consent then there could be little additional traffic. That said, the likely trip generation and distribution needs to be ascertained before this can be confirmed.

Site 6- East Bank

37. This is a large 2.8 ha site stretching along the east bank of the River Hull. The site is divided into 3 allocations in the LP which are:

- Site 8 - Tower Street (North) (0.83 ha) - capacity for 210 dwellings;
 - Site 9 - St Peter Street/Great Union Street (1.27 ha) - capacity for 246 dwellings; and
 - Site 10 - Tower Street (South)/Scale Lane Bridge (0.70 ha) - capacity for 390 dwellings.
38. East Bank as a whole is allocated for mixed uses in the LP and Policy 10 specifies the site “will be developed for a range of uses, predominantly residential but also with the potential to include leisure, office or hotel use”. The development trips arising at the SRN from the number of residential dwellings identified above will need to be understood by Highways England. Additionally, Highways England would welcome any forthcoming information on the size of the non-residential uses, in order to ascertain whether they are also likely to generate any traffic at the SRN.
39. With regards to parking and access, vehicle access will be from Tower Street/St Peter Street and for parking, it is stated that the focus will be on providing cycle and disabled parking. Highways England would welcome an emphasis being placed on providing only for cycle/disabled spaces, in order to encourage travel by active modes to and from the site. However, Highways England will require an understanding of whether alternative parking is available nearby and how the parking available relates to the trip generation of the site.
40. Overall, this site is considered to be ‘of possible concern’ for Highways England, given the high number of dwellings proposed for the site with the potential for leisure, office or hotel use combined with its proximity to the A63. The site’s proximity to the A63 suggests a significant proportion of trips from this development may utilise this section of SRN and may require possible highway mitigation measures. However, the likely trip generation and distribution needs to be ascertained before this can be confirmed.

Site 7- Dock Office Row

41. This is a 1.04 ha site (0.23 ha of dock area and 0.81 ha of developable land) which lies between the River Hull to the east and High Street/Dock Office Row to the west. The site is divided into 3 parcels in the LP, broadly based on ownership, although the two northern ones are contiguous and could be developed as one. The 3 divisions are:
- Site 400 - North End Shipyard referred to as ‘Blaydes Dock’ (0.64 ha) - part of the key locations for the £27.4m Yorkshire’s Maritime City project which will be a large visitor attraction. It is noted that the owners obtained planning permission in 2008 to build 2 apartment blocks with a total of 64 dwellings (the indicative residential capacity), located on both north and south sides of the Central Dry Dock;
 - Site 399 - 2-5 High Street (0.19 ha) where planning permission for 33 apartments (the indicative residential capacity) in 4 and 5 storey blocks was granted in 2006; and
 - Site 398 - High Street, south of Blaydes Staithe (0.21 ha) where planning permission for 64 apartments (the indicative residential capacity) was granted in 2012 but not implemented.

42. In total, the development of the sites comprising Dock Office Row will be for approximately 160 dwellings mainly in the form of apartments and the river front will be transformed as part of the Yorkshire Maritime City Project, which HCC indicates will become a major tourist destination around the docks that could include a visitor centre. Highways England will need to gain an understanding of the associated traffic generation for the whole of the Dock Office Row site.
43. With regards to access and parking, no vehicular access will be allowed onto the Maritime City site with the exception for maintenance or the promenade. SPD5 indicates that there is no defined parking requirement for this site at present as parking requirements are only set out for site 1 and 5 and there are consented car parks for site 2, 6 and 10. Given this, Highways England will require a consideration to be given to nearby parking availability, in order to ascertain how the parking provisions relate to the trip generation of the site as part of any forthcoming TA.
44. This site is 'of possible concern' for Highways England, given the number of dwellings and large visitor attraction proposed for the site combined with its proximity to the A63. The site's proximity to the A63/Ferensway and A63/Great Union Street junctions suggests a significant proportion of trips from the development may utilise this section of SRN. Depending on the number of development trips arising at the SRN, these may require possible highway mitigation measures. The likely trip generation and distribution needs to be ascertained before this can be confirmed.

Site 8- High Street

45. The Supporting Information SPD indicates that the site forms a key entry point to the city's Old Town and lies between River Hull to the east and High Street to the west. The site lies next to the A63 beneath the Myton Bridge. The site is currently vacant but is allocated in the LP for residential purposes. However, it is also noted that HCC indicates that ground floor uses that bring some activity to the High Street frontage should also be considered for the site such as offices. However, an indication of the size of the development proposals is not set out within the Supporting Information SPD or SPD13. This will be required by Highways England along with confirmation of whether any non- residential elements will be provided alongside the proposed dwellings. The development flows arising at the SRN from the whole development site will need to be understood by Highways England.
46. With regards to access and parking, HCC notes the site is somewhat constrained by vehicular access onto High Street. The SPD5 indicates that there is no defined parking requirement for this site at present, however, it is understood from the Supporting Information SPD that an internal courtyard type parking space/landscaping is preferred, accessed via in/out through the building onto High Street Highways England would welcome further information on parking provision for the site and how this correlates with the trip generation of the site within any forthcoming assessments of the site's traffic impact.
47. Overall, this site is 'of concern' for Highways England, given that the site lies adjacent to the SRN and the lack of details currently available in relation to the scale of the proposals. The site's proximity to the A63/Ferensway and A63/Great Union Street junctions suggests a significant proportion of trips from this development may utilise this section of SRN and may require possible highway mitigation measures. However, assessments of the trip generation and distribution of the whole site would need to be undertaken before it can be confirmed whether highway mitigation measures will be required.

Site 9- Wincolmllee

48. This site forms a key entry point to the northern part of the city centre and lies between the River Hull and Wilcolmllee. It is allocated in the LP for residential use with an indicative 200 units.
49. With regards to access and parking, the Supporting Information SPD indicates that on-site parking may be achievable with vehicular access from Wincolmllee. It is likely that vehicular access for servicing/parking would be limited and space provided toward the rear of residential properties. In the SPD13 document, HCC indicates that site parking should be part undercroft and part off-site provision. However, SPD5 indicates that there is no defined parking requirement for this site at present. Highways England would require any forthcoming TA to identify the total number of spaces proposed for the site and how this correlates with the site's trip generation.
50. Assuming that the residential units are apartments/flats and given the relatively small site area, this site is considered to be 'of no concern' for Highways England, given the indicative number of units proposed for the site. However, the site area, type of housing and parking proposals will need to be confirmed in order to verify this conclusion.

Site 10- Colonial Street

51. This site is located on the western edge of the city centre and lies between Anlaby Road and Spring Bank, the City Centre orbital box and Park Street. It is allocated in the LP for around 150 residential units. HCC indicates within the Supporting Information SPD that due to the nature of the road network and indicative numbers referenced in the LP, proposals seem to lend themselves to an apartment/perimeter block layout. However, Highways England would need the size and nature of the residential units to be confirmed in any traffic impact assessment undertaken for the site. The site is accessed from Colonial Street and Portland Street also serves as the route to access the MSCP parking at St Stephen's Shopping Centre. With regards to parking, HCC indicates that the block layout could contain an internal semi-private courtyard that provide parking (or undercroft parking) and amenity space for residents. Some parking could also be provided within the street scene. SPD5 indicates that the site has consent for a 258-space surface car park. Any forthcoming assessment of the site's trip generation will need to correlate with the parking availability in the vicinity of the development.
52. This site is 'of possible concern' for Highways England, given the indicative number of units proposed for the site. The site's proximity to the A63 suggests a significant proportion of trips from this development may utilise the A63/Ferensway junction. Given the potential for impact on this section of the SRN, it may require possible highway mitigation measures. However, the likely trip generation and distribution of the development trips needs to be presented in order for Highways England to understand the development's impact. Furthermore, the type of housing to be provided should be confirmed, as flats are likely to generate less trips at the SRN than houses.

Site 11- Anlaby Road/Park Street

53. This site is located on the inside edge of the City Centre boundary as defined in the LP and has had outline planning consent

for mixed uses including offices, hotel, housing and parking dated September 2011. The site is located adjacent to the rail line and station and is allocated for residential purposes in the LP for an indicative 82 dwellings.

54. In terms of access and parking, the Supporting Information SPD states that relevant parking standards as defined in the LP are flexible given the site's location on the edge of the city centre and proximity to public transport. HCC states that existing vehicle access points could be used but that they should be rationalised in to a single point of access/egress.
55. With regards to parking, as per other sites, SPD5 indicates that there is no defined parking requirement for this site at present. However, Highways England would welcome confirmation of the number of parking spaces proposed, alongside the likely trip generation associated with the proposed 82 dwellings.
56. This site is considered to be 'of no concern' for Highways England, given the indicative number of units proposed for the site and the site's proximity to the A63, it is likely that once trips distribute across the surrounding highway network, the impact of the proposals at the SRN will not warrant assessments to be undertaken and consequently would not need to be mitigated.

Site 12- Ice Arena

57. This site is a 1.5 ha site comprising the current Ice Arena and extensive surface car park. The site is readily accessible from English Street/Kingston Street and Commercial Road which connects to the A63. HCC indicate the site is unallocated in the LP, although it lies within the city centre boundary where a range and mix of uses is considered appropriate. The preferred use of the site is for housing (2/3 storey with a cul-de-sac/mews layout) and this is subject to addressing the proximity of port operations to the south. However, it is noted that this does not constrain other uses from occurring or being proposed. Further residential use on adjoining land could also occur in extending this scheme. Once known, Highways England would welcome confirmation of the propose use(s) for the site as the type and size of uses will determine the number of development trips generated by the site at the SRN.
58. With regards to parking and access, the main vehicular access is from English Street/Kingston Street roundabout but there is also potential for access from Manor House Street/Wellington Street West. SPD5 indicates that there is no defined parking requirement for this site at present. However, Highways England would welcome information on parking provision alongside an indication of how this correlates with the likely trip generation of the site.
59. This site is 'of no concern' for Highways England, given the proposed number of dwellings, once vehicle trips from the site are distributed across the surrounding highway network, it is likely that the impact at the SRN will not warrant assessments to be undertaken and consequently would not need to be mitigated.

Cumulative Impact

60. The total number of units allocated for Hull City Centre as found in section 2.8 of the SPD13 note totals 2, 500 units according to HCC, although it is noted from the site location drawing found in section 1.1 of the SPD13 note that this number differs as a total of 2,012 dwellings are given. It is appreciated that the total number of units allocated may be more or less depending on

the confirmed development proposals and associated uses to come forward. However, confirmation of the size and nature of the development should be provided to Highways England at the earliest opportunity and used in any forthcoming assessments of these 12 sites.

61. The previous sections of this TM have highlighted whether each individual site will be 'Of Concern', 'Of Possible Concern' and 'Of No Concern' for Highways England, based on the development details that are set out in the Supporting Information SPD and SPD 13. The conclusions in relation to each individual site assessment are summarised in Appendix A of this TM. Given the combined development potential for all 12 sites, it is also evident that their cumulative impact on the SRN could be significant at a number of SRN junctions on the A63. As such, in addition to assessing the traffic impact for each site individually in relation to the SRN, Highways England will need to understand the cumulative traffic impacts of all of the Plan sites at any SRN location which may be impacted upon. Highways England would welcome working with HCC, in order to ascertain the associated traffic generation of the key sites and whether potential highway mitigation measures may be required for the SRN.

Summary and Conclusions

62. CH2M has reviewed the 'City Centre Key Sites- Supporting Information' SPD, the SPD13 'Consultation Draft City Centre Key Sites Design Guide Document' and the SPD5 'Hull City Centre Parking Strategy' on behalf of Highways England. The key focus of the review is whether the 12 key sites identified for City Centre development (within SPD13 and the Supporting Information SPD) are likely to impact at the SRN. However, elements of the Parking Strategy that could impact on traffic levels at the SRN have also been reviewed.
63. This review has highlighted the requirement for the evidence base to be further developed by HCC. Appendix A indicates whether, based on the information contained within the above named documents, each key development site is 'Of Concern', 'Of Possible Concern' or 'Of No Concern'. However, further information would need to be supplied to confirm the scale and nature of the proposals for each site, in order to confirm the conclusions, set out in Appendix A. The trip generation and distribution for each site will need to be presented to Highways England and a confirmation of how the availability of parking at and surrounding each site correlates with the site's trip generation will need to be considered. Highways England would expect these considerations to be included as part of the TA process for any development that comes forward through the planning system. Highways England would welcome consultation on each development site at the earliest opportunity.
64. In terms of the Parking Strategy, Highways England welcomes the general principles of limiting car parking to encourage sustainable modes of transport. However, through the proposed further reviews of the Parking Strategy, specific consideration will need to be given to how ongoing changes to parking provision may change traffic patterns and any impact of these on the SRN.

Size (Ha) (gross site area)	Number of dwellings	Site Address	Site Development Type	First Point of SRN Contact	Is the Site of Concern?
2.1 ha	270	Site 1- Albion Square/Kingston House	Mixed Use	A63	Yes
1.5 ha	150	Site 2- Blackfriargate	Mixed Use	A63	Possible
0.58 ha	40 units	Site 3- Portside	Mixed Use	A63	Possible
1.7 ha	200	Site 4- Humber Quays (West)	Residential	A63	Possible
3.8 ha	Unknown	Site 5- Myton Street	Mixed Use	A63	Possible
2.8 ha	850	Site 6- East Bank	Mixed Use	A63	Possible
1.04 ha	160	Site 7- Dock Office Row	Mixed Use	A63	Possible
Unknown	Unknown	Site 8- High Street	Residential	A63	Yes
Unknown	200 units	Site 9- Wincolmllee	Residential	A63	No
Unknown	150	Site 10- Colonial Street	Residential	A63	Possible
Unknown	82	Site 11- Anlaby Road/Park Street	Residential	A63	No
1.5 ha	Unknown	Site 12- Ice Arena	Residential preferred	A63	No

Appendix C – Letter from Historic England

1. We welcome the production of an SPD to guide how these key City Centre sites might be developed. Given the recognised importance of Hull's historic core, providing a framework which will not only help to realise the full potential of each of these sites but, as importantly, will also ensure that those elements which contribute to Hull's distinctive character are safeguarded is an extremely difficult challenge. This challenge was one of the main reasons why Policy 10 Criterion 2 of the Adopted Local Plan set out a requirement that the development of the City Centre Mixed Use Sites would be guided by Development Briefs or Masterplans.
2. Unfortunately, as you will see from our comments, below, we do not consider that this document provides a sufficiently robust or clear framework for the development of these sites and, as a result are concerned that not only might it fail to maximise the full potential that the City Centre has to offer, but that it could lead to forms of development which harm elements which contribute to the Hull's distinctive character. Given the City's intention to make Hull a world-class visitor destination, this is deeply worrying.
3. If you consider a meeting would be useful to discuss our comments further, please do not hesitate to contact me.

General Comments

The absence of an overarching framework for the City Centre

4. Whilst the Adopted Local Plan sets out a high-level strategy for the City as a whole, by necessity, it does not provide the level of detail necessary to address how the development of each of these sites will fit into the bigger picture of the City Centre nor how the inter-relationships or cumulative impacts resulting from their development might be managed. In the absence of such a framework, there is a concern that the full potential offered by a more comprehensive approach might be missed.

HE Recommendation:

5. An overarching strategic Masterplan for the City Centre should be prepared in order to provide a strategic framework for the development of the sites in this SPD.

The relationship of this SPD to the Supporting Information

6. Over the past five years or so, the Council has produced Development Briefs for several of these sites. Those Development Briefs provided a good analysis of the townscape context of each of the sites, of their sensitivities and opportunities and, without being too prescriptive, provided clear guidance as to how each of these areas might be taken forward. As such, they greatly assisted those proposing schemes for the redevelopment of those sites (and, indeed, both local communities and decision-makers understand what would and would not be permitted). By contrast, this Draft SPD contains no analysis of the context of each site and, as a result, it is often difficult to understand the rationale for what is it proposing. Much of this context does appear in the Supporting Information and the content of that document actually needs to form part of the SPD, itself, in order to help those using it better understand the nature of the constraints for each of the sites and how they might be addressed.

HE Recommendation:

7. The information contained in the Supporting Information needs to be included as part of this SPD.

The relationship of this SPD to the existing Development Briefs

8. In Paragraph 2.14, the SPD states that the document is intended to provide 'site specific updates' to the Development Briefs. However, it is unclear in what way the guidance provided in the SPD amends that provided in the existing Development Briefs or the reasons why any changes have been made. Moreover, in terms of ease of use, a prospective developer will theoretically have to refer not only to the Policies in the Local Plan, but also, potentially, to an existing Development Brief, to this SPD and its Supporting Information. They will then have to evaluate what difference there is in the advice given any Development Brief compared to the SPD. It would greatly assist all concerned if the excellent work already undertaken by the Council over the past five years in producing the existing Development Briefs was incorporated into this emerging SPD along with that contained in the Supporting Information. This would then mean that everything that a prospective developer and decision maker needs to know about how the Council considers each of these sites might be developed would be in one document.

HE Recommendations:

9. The existing Development Briefs should be updated to reflect the requirements of the Adopted Local Plan and changed circumstances and incorporated into the draft City Centre Sites Design Guide SPD along its the Supporting Information

General comments on the content of the SPD

10. We have the following general comment to make regarding the SPD:-

- In terms of its guidance, unlike the existing Development Briefs which provided a clear statement of what was expected on each site, the framework that the SPD sets out is, at time, unclear and in some cases extremely vague. In many places its advice appears tentative, rather than definitive. Words and phrases like “perhaps”, “could”, “consider”, “in some way”, etc. do not provide enough clarity to either developers or those assessing schemes about what would be expected in any redevelopment.
- In the vast majority of cases, the introductory sentence to each of the ‘Design Challenges and Opportunities’ do not relate, grammatically, to the alphabetical points which follow
- Throughout the SPD reference is made to “storey height” without defining a height or height range. This makes it difficult to evaluate what sort of impact buildings of the scale being suggested might have upon the City’s skyline. This is particularly so in the case of those sites which are proposing an element of retailing where ground floor retail storeys tend to be higher than those of the floors above. In order to assist those using this SPD, it might be more appropriate to specify a range of storey heights and range of ground floor storey heights and/or specify the maximum heights for each building or block.
- The SPD raises a number of complex and potentially expensive archaeological issues. This is most apparent in the case of the proposed sites alongside the River Hull where it has been established, from previous archaeological evaluation, that deep, waterlogged and complex archaeological deposits survive in a good state of preservation. Typically these deposits consist of a sequence of medieval timber waterfronts with their associated buildings and activities. The archaeological picture is further complicated on the eastern side of the River Hull where the medieval and Tudor defences of the town and port are located. Historic England has no hesitation in considering all these deposits to be nationally important and it is therefore essential that any development along the River Hull is informed by an appropriate scheme of sampling, survey and evaluation to establish the significance of the site(s).
- It would be helpful if the SPD included some illustrations of the potential forms of development together with exemplar precedents (where they exist), to show the City Council’s aspirations for each of the sites.
- The proposed scale of the buildings on each of the development sites should be tested through use of a Townscape and Key Sites Views Analysis in order to demonstrate that they will not compete with or dilute the City’s landmark architectural features on its skyline

HE Recommendations:

- (a) The ‘Design Challenges and Opportunities’ need to be more positive about what is expected on each site. They need to provide sufficient clarity to enable those preparing schemes understand how the Council considers the identified challenges and considerations might best be met.**
- (b) The introductory sentences of each of the ‘Design Challenges and Opportunities’ need to relate, grammatically, to the alphabetical points which follow**
- (c) The SPD should specify a range of storey heights and range of ground floor storey heights and/or specify the maximum heights for each building or block.**
- (d) The SPD needs to alert prospective developers of the sites alongside the River Hull of the likelihood of archaeological remains, potentially of national importance, and the need for development proposals to be informed by a comprehensive scheme of sampling, survey and evaluation to establish the significance of the sites.**
- (e) Illustrations of the potential form of development, and exemplar precedents, to emphasise the City Council’s aspirations for each of the sites should be included in the SPD.**
- (f) The proposed scale of each of the proposed developments should be tested through use of a Townscape and Key Sites Views Analysis to demonstrate that they would not compete with or dilute the City’s landmark architectural features on its skyline.**

The maps in the SPD

11. Given the extent of the Old Town Conservation Area and the numbers and spread of Listed Buildings across this part of Hull, the development of the majority of the sites covered by this SPD will impact, to some degree, upon elements which contribute to the significance of the City’s heritage assets. It is essential, therefore, that prospective developers are fully aware from the outset of the presence of the various heritage assets in the vicinity of each of these sites. In some cases, their presence may prove a real challenge in terms of how the site is actually brought forward for development. However, none of the maps identify the Conservation Area boundaries, and only a few show the Listed Buildings or the locally listed buildings which are required to be retained. For several of the sites, an important consideration is how the development will address key views or vistas. Where this is the case, it would be helpful to those developing schemes if these key views could be identified. The

specified storey heights are signified by different colours, on different plans, which is confusing.

HE Recommendation:

(a) The Maps for each Key Site should identify:-

(i) All the designated heritage assets in the vicinity of the site

(ii) All the locally listed buildings which are required to be retained

(iii) The key views and vistas

(b) A single, consistent approach should be used throughout the Maps to denote the colour of the proposed storey heights.

Proposed uses

12. Whilst it is accepted that the uses suggested for each of the sites are essentially those which are set out in the Adopted Local Plan, nevertheless, given the numbers of vacant units already across the City Centre (in addition to the considerable number in 'marginal' uses and charity shops), it is concerning that the SPD is proposing to provide even more retailing. This could result in the retail core becoming less focused and vibrant, resulting in even more vacant or underused units.

Detailed comments on the content of the SPD

Introductory Section

Page	Section	HE Comments	HE Suggested Change	City Council response
4	Key Sites Map	In view of the fact that one of the most important considerations in the redevelopment of many of these sites will be the potential impact they might have upon the historic environment of the City Centre, it would be helpful to users of the document to show the extent of the three Conservation Areas covering this part of Hull – i.e. the Old Town Conservation Area, the Georgian New Town Conservation Area and the Charterhouse Conservation Areas.	Amend the key Sites map to show the three Conservation Areas covering the City Centre.	<i>Paragraph 2.7 highlights the city centre Conservation Areas and references Policy 16 about heritage considerations. Adding more detail to the map would not result in clarity of purpose in showing the broad locations for change. However, a map that illustrates the heritage assets including Conservation Areas, Listed Buildings and local listed buildings, and the Scheduled Ancient Monument, will be included in the SPD.</i>

Page	Section	HE Comments	HE Suggested Change	City Council response
5	Paragraph 1.4, Heritage	In order to assist users of this document, this definition should include Scheduled Monuments (which will certainly be an important consideration for Site 6 (East Bank)) and, in several of the sites particularly in the vicinity of the Rivers Hull and Humber, the potential for non- designated archaeological remains (and, therefore, the need to have regard to the advice in the Council's SPD2). It is also important to highlight that, in the case of many of the assets, it will be the impact not so much on the asset itself, but on its setting.	Paragraph 1.4, Heritage amend to read:- "Heritage – consideration of the potential impacts upon designated heritage assets (such as Conservation Areas, Listed Buildings and Scheduled Monuments), non-designated heritage assets (such as locally Listed Buildings and other archaeological remains) and their settings"	<i>This part of the SPD points out the considerations for the design process but the actual requirements are already outlined in the Local Plan, but there is no harm in reinforcing this point.</i>
7	The Design Process, final column	In order to assist users of the document it would be preferable to include reference to the need to also have regard to the setting of heritage assets	The Design Process, final column amend to read:- "Existing heritage assets and their settings"	<i>This part of the SPD points out the considerations for the design process but the actual requirements are already outlined in the Local Plan, but there is no harm in reinforcing this point.</i>

Page	Section	HE Comments	HE Suggested Change	City Council response
8	Paragraph 2.2, Policy 9	A key element of this Policy (which is of particular relevance to this SPD) is Criterion 4 relating to the Old Town and, especially, the requirement that developments should be compatible with, and respect, the historic fabric and unique heritage importance of the area.	Paragraph 2.2, Policy 9 amend to read:- “.. and a requirement that developments should be compatible with, and respect, the historic fabric and unique heritage importance of the area”.	<i>This part of the SPD points out a short hand version of the Local Plan policy, but there is no harm in reinforcing this point.</i>
8	Paragraph 2.2, Policy 16	As worded this does not reflect a number of key elements of the Local Plan Policy, especially the conservation of non- designated heritage assets and the support to proposals which preserve or enhance those elements of Hull’s historic environment which contribute to the distinct identity of the City.	Amend Paragraph 2.2, Policy 16 to read:- “Seeks to ensure that Hull’s designated and non-designated heritage assets are appropriately conserved and supports proposals which will preserve or enhance those elements of Hull’s historic environment which contribute to	<i>This part of the SPD points out a short hand version of the Local Plan policy, but there is no harm in reinforcing this point.</i>

Page	Section	HE Comments	HE Suggested Change	City Council response
			the distinct identity of the City”.	
15	Paragraph 2.12	The heritage significance of Hull is inextricably linked to its relationship with its rivers. It is important, therefore, that any works to improve flood defences or improve flood resilience should seek to understand, respect and, where possible, enhance this connection.	Add the following to the end of Paragraph 2.12:- “The heritage significance of Hull is inextricably linked to its relationship with its rivers. It is important that any works to flood defences should seek to understand, respect and where possible enhance this connection”.	<i>All development should address the distinctiveness of place under Local Plan policies 15 and 16, so the point is perhaps covered but in a more coherent way as regards it being a requirement, rather than a ‘nice to have’ sought through an SPD. No change is therefore proposed.</i>

Key Site 1 – Albion Square

The redevelopment of this area provides an opportunity to reconnect Jameson Street, the Old Town, and the Georgian New Town as well as greatly improving the setting of a number of heritage assets within its vicinity. However, the site’s redevelopment could, potentially, also harm elements which contribute to the significance of these assets.

It is concerning that the design guidance for this site is equivocal about the “Three Ships” Wall mosaic, particularly given the strong local support for its retention and its inclusion on the Council’s Local List.

Page	Section	HE Comments	HE Suggested Change	<i>City Council response</i>
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Page	Section	HE Comments	HE Suggested Change	City Council response
19	Paragraph 1.2	<p>The explanatory paragraph advice appears to contradict a number of Local Plan Policies and would benefit from a number of changes to improve its intentions:-</p> <ul style="list-style-type: none"> • This redevelopment of this area provides an opportunity not simply to connect this site itself with the primary shopping area but also to reconnect the Georgian New Town area with the heart of the City. It also has the potential to greatly improve the setting of a number of heritage assets within its vicinity, especially the row of Listed Buildings on the northern side of Albion Street. • The Three Ships Mural is a very important local landmark and there is considerable support for its retention. As written, however, this Paragraph gives the potential developer the option about whether it is retained or not. There needs to be a clear statement that there is an expectation that this important local landmark will be retained, refurbished and incorporated as part of any redevelopment proposals. • The redevelopment of this site provides an opportunity to stitch back together again the rather fragmented streetscape structure of this part of the City. 	<p>Paragraph 1.2 amend the second sentence to read:- “ ... The intention is to stitch back together the streetscape character of Albion Street and Bond Street, to provide better connectivity between the northern part of the City Centre and the primary shopping area, to enhance the public realm, and to provide a more appropriate setting for the Listed Buildings on Albion Terrace. It is important that any redevelopment of this site incorporates the ‘Three Ships Mosaic’, an important local landmark, and responds in design terms to the adjacent Conservation Areas.”</p>	<p><i>It is agreed the site should be better connected to its surroundings so the words used reflect how this can be achieved. Closer reference to the listed buildings on Albion Street will be made and reference to Conservation Area. The statement will also be amended in avoiding the implication this is a ‘policy’ and the criteria follow in each case. The Three Ships mural poses challenges including the costs of retaining it as part of redevelopment options and it is locally listed. Changes are therefore suggested accepting there is seeming public support for its retention.</i></p>

Page	Section	HE Comments	HE Suggested Change	City Council response
19	Key Site 1 – Challenges and Opportunities, Criterion a	It is not clear what is meant by the term ‘significant corner treatments’. This Criterion needs to be more specific about what it is seeking on this extremely prominent corner elevation.	Amend accordingly	<i>Reference to ‘significant’ will be replaced with ‘appropriate’.</i>
19	Key Site 1 – Challenges and Opportunities, Criterion c	It would be preferable if this Criterion set out a requirement for the development of the part of the site opposite the Listed Buildings to be of a scale and design that in sympathy with the Listed Buildings opposite. This is addressed in Paragraph 1.19 of the Supporting Information but is not well articulated in this Criterion.	Key Site 1 – Challenges and Opportunities, Criterion c amend to read:- ”New buildings fronting Albion Street should respond to the key characteristics of the Georgian New Town – creating proportioned, defined street spaces reflecting the set back and boundary treatment on the north side”	<i>Reference is made to development being ‘in sympathy with the Georgian terraces opposite’ that could be in a contemporary way but to be amended to ‘to be in sympathy with the listed Georgian terraces opposite including in terms of building scale, plot width and rhythms and proportions.....’</i>
19	Key Site 1 – Challenges and Opportunities, Criterion i	The Three Ships Mural is a very important local landmark and there is considerable support for its retention. As written, this Criterion gives potential developers the option about whether or not it is retained. There needs to be a clear statement that there is an expectation that this	Key Site 1 – Challenges and Opportunities, Criterion i t read:- “Redevelopment should retain and	<i>The Three Ships mural poses challenges including the costs of retaining it as part of redevelopment options and it is not statutorily listed, although it is locally listed. Changes are therefore suggested accepting there is seeming public support for its retention.</i>

Page	Section	HE Comments	HE Suggested Change	City Council response
		important local landmark will be retained and incorporated into any redevelopment proposals	incorporate the BHS wall mosaic and murals”	
19	Key Site 1 – Challenges and Opportunities additional Criterion	<p>The Supporting Information sets out a number of other important considerations which are not addressed in the ‘Challenges and Opportunities’ for this site. These include:-</p> <ul style="list-style-type: none"> • Potential for closing of one carriageway of Bond Street • Architectural structure of the built fabric should help to enclose spaces and streets, terminate views and provide reference points • The possible relocation of the Ice rink. If it is relocated to this site, it might actually be preferable to place this building at the southern end of the site on Jameson Street since this would help to create footfall and activity on this thoroughfare and, potentially, might be capable of being built behind the retained façade of the Jameson Street elevation of the former BHS store. The proposed car park and where it would be accessed from 	Amend accordingly	<i>The Supporting Information document underpins the SPD steer in design terms so should be referenced as part of any development proposal. Key Sites paragraph 1.1 will be amended to reflect the importance of the supporting document and in providing further detailed information in demonstrating what is referred to under a ‘challenges and opportunities’ statement.</i>

Page	Section	HE Comments	HE Suggested Change	City Council response
20	Key Site 1 Map	<ul style="list-style-type: none"> • This site lies between two Conservation Areas, has a terrace of Listed Buildings to the north and its redevelopment could also harm elements which contribute to the significance of other Listed Buildings in its vicinity. In order to assist users of this document, these designated heritage assets should be identified on this map. • The Three Ships Mural is a very important local landmark and there is considerable support for its retention. This should also be identified. • It would also be helpful to label all the Streets and Squares which are referred to in the 'Challenges and Opportunities' box • The key includes a reference to "Ice Arena entrance" although there is no other reference to the Ice Arena either in the 'Challenges and Opportunities' box nor is its location identified on the accompanying maps . 	Amend accordingly	<p><i>These additions to the indicative proposals would over complicate the map. A new Heritage Assets Map is to be provided on new page 14 that indicates the necessary detail and there is limited point in repeating this for each of the sites.</i></p> <p><i>It is agreed that the ice arena could be located in a way that brings activity to Jameson Street, with vehicle access from Bond Street and thereby enable a much larger public space. However, there is insufficient space within the site to accommodate an Olympic size ice rink in the way envisaged.</i></p>

Page	Section	HE Comments	HE Suggested Change	City Council response
21	Map showing proposed Storey Heights	<p>The heights shown for the block at the northern end of the site needs to reflect the conclusions set out in Paragraph 1.19 of the Supporting Statement.</p> <p>The Grade II Listed Former Board School Office marks the eastern corner of Albion Street and Union Street. Similarly, the north- western and north-eastern corner blocks of the new development should rise to mark the corner of the development site.</p>	Amend accordingly	<i>The supporting document references the existing 3.5 Georgian storey heights opposite the site on its northern boundary that equates to a more modern 4 – 4.5 storeys, reflected in the storey heights plan on new page 23.</i>

Key Site 2 – Blackfriargate

This redevelopment of this area provides an opportunity to regenerate a key site within the Fruit Market and at the eastern edge of the Old Town Conservation Area. The 2013 Development Brief noted the views from the westbound carriageway of the A63 and adjacent path across this site to the rest of the Fruit Market, Marina and Humber Estuary. The eastbound lane has clear views into the west end of the site at the approach to Myton Bridge, views across the site focus on the Tidal Surge Barrier and the Deep. The Supporting Information also identified a number of key viewpoints towards this site.

Historically this urban block was bisected by 5 ginnels, running north to south, providing a high degree of permeability. 4 of these 5 historic routes would be built over under the current proposals, leading to a loss of local distinctiveness and ignoring the principles set out in the Hull Fruit Market Development Brief.

Page	Section	HE Comments	HE Suggested Change	City Council response
22	Paragraph 1.3	<p>The second sentence would benefit a number of amendments to better-explain the opportunities the site provides to improve the character of this part of the Old Town. Given that this site lies wholly within the Old Town Conservation Area, this fact ought to be referred to within this introductory Paragraph as well.</p> <p>The redevelopment of this site offers huge potential to stitch back together the fragmented townscape of this part of the Fruit Market and to enhance one of the key views along Queen Street towards Hull Minster.</p> <p>This site also provides the first view that visitors to the City from the existing Ferry Terminal (and the new Cruise Liner Terminal when built) will have of Hull City Centre. It is essential, therefore, that the building on the corner of High Street with Blackfriargate is of the highest quality.</p> <p>These aspects need to be referred to within this introductory Paragraph</p>	Amend accordingly	<p><i>Paragraph 1.3 will be amended to the end of the first sentence to say proposals should be 'reflective of the Old Town Conservation Area character and appearance.' In addition to additions to the first bullet point about the site being a 'gateway entrance to the Fruit Market area'.</i></p> <p><i>The reinstatement of a building with frontage to Queen Street will enhance the view toward Hull Minster, as indicated on the indicative plan.</i></p> <p><i>An additional criterion will be added as follows: 'achieving something that is of the highest quality reflective of its location next to the A63 and gateway entrance to the Fruit Market.'</i></p>

Page	Section	HE Comments	HE Suggested Change	City Council response
22	Key site 2 – Challenges and Opportunities, Criterion b	<p>It is not clear what is meant by this Criterion.</p> <p>This site provides one of the first views that visitors to the City from the existing Ferry Terminal travelling westwards along the A63 will have of the City Centre. It is essential, therefore, that the design takes account of these views and sets out a clear expectation that the building at the junction of High Street with Blackfriargate is of the highest quality of design, providing an appropriate entrance building to the historic core of the City. This building, if it is to be a landmark building as the Supporting Information suggests, will also need to address the numerous other views towards this site which are identified in the Supporting Information, especially the one across the River Hull from The Deep (and how it might encourage visitors to venture from that tourist attraction into the Fruit Market and Old Town area). These principles need to be stated within this design requirement and the views identified on the map on Page 23.</p>	Amend accordingly	<p><i>An additional criterion will be added as follows: ‘achieving something that is of the highest quality reflective of its location next to the A63 and ‘gateway’ entrance to the Fruit Market area.’</i></p> <p><i>Criteria h will be amended to ‘that layout responds to outward views or glimpses toward landmark buildings and to key views towards this site from the surrounding area’</i></p>

Page	Section	HE Comments	HE Suggested Change	City Council response
22	Key site 2 – Challenges and Opportunities, Criterion c	The intentions regarding Queen Street, Blackfriargate and Blanket Row might be better expressed along the lines suggested in Paragraph 4.10 of the Supporting Information - i.e. that the original alignment of buildings along this street should be recreated and, in terms of Queen Street, help frame the vista to Holy Trinity Church.	Amend accordingly	<i>The reinstatement of a building with frontage to Queen Street will enhance the view toward Hull Minster. The proposed amendment will be added as follows: ‘achieving something that is of the highest quality reflective of its location next to the A63 and ‘gateway’ entrance to the Fruit Market area.’</i>
22	Key site 2 – Challenges and Opportunities, Criterion e	In this former dock area, the trees on the eastern corner of this site are a somewhat incongruous element. Consideration should be given to their removal in order to enable the development of a building that follows the historic building line around the curve of Humber Street. This would help not only to better link, visually, the Fruit Market area with the route to the Museums Quarter but also encourage people to venture under the A63 to High Street.	Amend accordingly	<i>There is merit in retaining the tree line in softening a possible built edge to the eastern end of the site as detailed in paragraph 4.8 of the supporting document, although replacement would also be acceptable so this should be reflected as an amendment. The indicative designs show the retention of the trees.</i>
22	Key site 2 – Challenges and Opportunities, Criterion f	The wording of this Criterion is extremely vague and would benefit from more clearly articulating the requirements that are set out in Paragraph 4.6 of the Supporting Information.	Amend accordingly	<i>Replace criteria f with ‘having a design that has a contemporary building that sits comfortably within its surroundings.’</i>
22	Key Site 2 – Challenges and Opportunities, Criterion h	It is not just views from the site that are important but, as the Supporting Information makes clear, there are also numerous views across the city centre towards this site.	Key Site 2 – Challenges and Opportunities, Criterion h re-word as follows:	<i>The proposed amendment will be added as follows to new criteria i: ‘a layout that responds to outward views or glimpses toward landmark buildings and to key views towards this site from the surrounding area’</i>

Page	Section	HE Comments	HE Suggested Change	City Council response
			<p>“Specifically acknowledge and respond to outward views or glimpses of landmark buildings surrounding the site and to the key views towards this site from the surrounding area.”</p>	
22	Key Site 2 – Challenges and Opportunities, Criterion i	The wording of this Criterion would benefit from a small amendment to better-articulate its intentions and the requirements of Paragraph 4.14 and 4.15 of the Supporting Information	<p>Re-word as follows: “Incorporate public realm works which both respond to the important view along Blanket Row and Humber Street towards the Marina and complement the existing public realm works in the Fruit Market.”</p>	<p><i>Amend new criteria k to read ‘incorporating public realm works which both respond to the important views along Blanket Row and Humber Street toward the Marina and complement the existing public realm works in the Fruit Market.’</i></p>

Page	Section	HE Comments	HE Suggested Change	City Council response
22	Key Site 2 – Challenges and Opportunities, Criterion j	It is unclear how those preparing schemes for the redevelopment of this site would implement this Criterion given the diversity of designs and materials in the surrounding area. The inclusion of the phrase ‘in some way’ is neither clear nor particularly helpful. Paragraph 4.16 of the Supporting Information suggests that traditional materials are encouraged (such as the Old Town Heritage Initiative palette) but more modern materials will be supported where credible rationale is given.	Amend accordingly	<i>It is considered reasonable to make reference to this in trying to capture something of the emerging local character. However, Local Plan policy 14 and 15 about design and local distinctiveness requires consideration of these matters and is more forceful that including them in SPD.</i>
22	Key site 2 – Challenges and Opportunities, proposed additional Criterion	There is an important view towards Hull Minster along the entire length of Queen Street. This is recognised in Paragraph 4.10 of the Supporting Information. It is important that the design of any buildings along its western side take the opportunity to frame this view in an appropriate manner. This view should also be one of those identified on the map on page 23.	Amend accordingly	<i>This point is covered by amendments to new criterion i above.</i>
22	Key site 2 – Challenges and Opportunities additional Criterion	The Supporting Information sets out a number of other important considerations which are not addressed in the Challenges and Opportunities for this site. These include:- <ul style="list-style-type: none"> • Retention of the substations • Approach to the Main Sewer 	Amend accordingly	<i>These are not considered critical matters although the Supporting Document status is clarified.</i>

Page	Section	HE Comments	HE Suggested Change	City Council response
		<ul style="list-style-type: none"> The opportunity to create a skyline statement from the west-bound carriageway of the A63 		
23	Key Site 2 Plan	<ul style="list-style-type: none"> This site lies in the Old Town Conservation Area and is prominent in views along Queen Street towards Hull Minster. The Central Dry Dock, to the south, and the Tidal Surge Barrier, to the east, are Grade II Listed Buildings. In order to assist users of this document, these designated heritage assets should be identified on this map. Criterion g of the Challenges and opportunities proposes that former alleyways be reinstated. It would be helpful to illustrate where these are. It would be helpful to show where the key views towards and across this site are (and where particular care might be required in design terms) The street names referred to within the Design Challenges and Opportunities box should be identified on this map. 	Amend accordingly	<p><i>The proposed additions would over complicate the map. A new Heritage Assets Map is to be included on new page 14 and there is limited point in repeating this for each of the specific sites.</i></p> <p><i>Add the street names and former alleyways to the map on page 34 of the Supporting Document and the status of this document is clarified.</i></p> <p><i>The key views and view paths are shown on the map on page 35 to the Supporting Document and referenced in paragraph 4.2.</i></p>

Key Site 3 – Portside

The visual sensitivity of this site cannot be underestimated, due to its highly prominent position within the Old Town Conservation Area. The 2013 Development Brief highlighted that views from this location take in the Marina, the Old Town, provide a panoramic view of the Humber Estuary. The site is also prominent in views from Wellington Street, along Humber Dock Street and looking from the A63. It will be particularly visible from the new footbridge proposed as part of the A63 upgrade.

The Supporting Information considers that this site - with its dock, lock, swing bridge and tidal basin walls, surfaces and rail lines, together with surviving paraphernalia such as bollards and mechanical housings - is one of the city's most distinctive historic dockland places.

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25	Paragraph 1.4	Although it is referred to in Criterion a of the Design Challenges and Opportunities, this introductory Paragraph needs to refer to the particular sensitivities of this site including its location within the Conservation Area and its prominence in numerous views across this part of the City Centre.	Insert the following additional Paragraph at the beginning of Paragraph 1.4:- ‘This is a particularly sensitive site and one of the city’s most distinctive historic dockland places. It is also prominent in several key views across the Fruit Market area. Designs for offices with ground floor restaurants or other leisure uses, or uses ancillary to	<i>Amend the introduction paragraph 1.4 to the site as: ‘This is a particularly environmentally sensitive site and one of the city’s most distinctive historic dockland places. It is also prominent in several key views across the Fruit Market area as well as views towards it from other parts of the city centre as well as new views across it from the new pedestrian bridge. Designs for offices with ground floor restaurants or other leisure uses, or uses ancillary to residential use or mix of these uses should respond to its unique Marina location as well as reinstate the road frontage. High quality glazed buildings could complement Humber Quays offices nearby.’</i>

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			residential use or mix of these uses should respond to its unique Marina location’.	
25	Key Site 3 – Challenges and Opportunities, Criterion a	We have significant concerns about the potential impact which a design Criterion which requires a development to be ‘highly visible’ might have upon the character of this part of the Fruit Market particularly as it provides no clarifying of what this might entail or how it might be delivered.	Key Site 3 – Challenges and Opportunities, Criterion a re-word as follows:- “Address and respond to the unique marina location and highly-prominent position within the Old Town Conservation Area.”	<i>Amend the criterion ‘a’ to ‘addressing and responding to the unique marina location and its highly prominent position within the Old Town Conservation Area and nearby listed buildings.’</i>
25	Key Site 3 – Challenges and Opportunities, Criterion b	This Criterion would benefit from more clearly expressing what is acceptable in this important location	Re-word as follows: “Provide an iconic, appropriately-scaled focal point within the Marina and Old Town Conservation Area.”	<i>Amend the criterion ‘b. a preference for contemporary buildings with heights reflective of the local context;’</i>
25	Key Site 3 – Challenges and Opportunities, Criterion f	The public realm has to be of a quality commensurate with that used across the remainder of the Fruit Market.	Key Site 3 – Challenges and Opportunities, Criterion f re-word as follows:	<i>Amend the criterion ‘f. incorporating public realm works to animate the building fronts, waterside and outdoor space and in a way that complements works already in place within the Fruit Market area.’</i>

Page	Section	HE Comments	HE Suggested Change	City Council responses
			“Incorporate a high-quality public realm which complements that used elsewhere in the Fruit Market”	
25	Key Site 3 Challenges and Opportunities , Criterion f –	This Criterion would benefit from a slight modification to strengthen its requirements.	Key Site 3 – Challenges and Opportunities, Criterion f re-word as follows: “Incorporate ground level uses which animate and activate the waterside.”	<i>Amend the criterion ‘g. incorporating dual aspect arrangements including ground level uses which animate and activate the waterside;’</i>
25	Key Site 3 – Challenges and Opportunities, additional Criterion	As the Supporting Information notes, this site is one of the city’s most distinctive historic dockland places with its dock, lock, swing bridge and tidal basin walls, street surfaces and rail lines together with surviving paraphernalia such as bollards and mechanical housings. It is imperative that these important links with the area’s maritime past are retained and, where necessary, refurbished as part of any redevelopment of this area. An additional Criterion needs to be added setting out this expectation.	Amend accordingly	<i>Add an additional criterion ‘h. retaining and enhancing the local heritage assets including the dock, lock, swing bridge, tidal basin walls, street surfaces, and rail lines together with dockside paraphernalia.’</i>

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25	Key Site 3 – Challenges and Opportunities, additional Criterion	There are a number of important views across this site from several parts of the Fruit Market. These would need to be addressed in any development proposals.	Amend accordingly	<i>Add an additional criterion ‘i. a layout that responds to outward views or glimpses toward landmark buildings and to key views towards this site from the surrounding area.’</i>
26	Key Site 3 Plan	<ul style="list-style-type: none"> • This is an important site within the Old Town Conservation Area lying between the Humber Dock Basin and the Grade II Listed Humber Dock. In order to assist users of this document, the designated heritage assets in this area should be identified on this map. • It would be helpful to show where the key views towards and across this site are (and where particular care might be required in design terms) • In the area identified by the number 6 on the key, it is not only the setts which should be retained. The rail lines together with other surviving elements of the City’s maritime history, such as bollards and mechanical housings, also should be retained • Historically, the buildings on the 	Amend accordingly	<p><i>A heritage assets map is included on new page 14 but details about important views and heritage assets are already provided in the Supporting Information page 46.</i></p> <p><i>Add an additional criterion ‘h. retaining and enhancing the dock, lock, swing bridge, tidal basin walls, street surfaces, and rail lines together with dockside paraphernalia.’ explains what is important to retain and it is not necessary to include this in the indicative plan.</i></p> <p><i>It is agreed building heights should be more in keeping with the character and appearance of the Conservation Area so reference will be made to ‘up to 7 storeys’ reflective of surrounding heights but in a way that provides scope for variation.</i></p> <p><i>Reference will also be made in the introduction to the SPD about the indicative nature of the drawings and to heights being maximums.</i></p>

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		<p>northern side of the Humber Dock Basin extended far further east towards Minerva Street than the proposed southernmost block. It may be preferable to create a larger footprint for the southern building rather than the open space which is currently illustrated. This would help to connect the two halves of Wellington Street.</p>		
27	Diagram showing proposed heights	<p>It is unclear how a height of 9 storeys has been arrived at. Historic development was predominantly low-rise warehouses, setting no precedent for the proposed 9 storey element of the southern development plot. The only building anywhere near this scale on this dock is the Listed Warehouse No.13 and that is only seven stories high. Such a proposal also seems to conflict with the concerns expressed in Paragraph 3.10 of the Supporting Information regarding a high building sited next to the Lock Keeper's Cottage.</p> <p>We are particularly concerned that a building of this height in this location would challenge the dominance of the Minster Tower as the defining landmark of the skyline of the City.</p>	Amend accordingly	<p><i>Building heights should be more in keeping with the character and appearance of the Conservation Area so reference will be made to 'up to 7 storeys' reflective of surrounding heights but in a way that provides scope for variation.</i></p> <p><i>Reference will also be made in the introduction to the SPD about the indicative nature of the drawings and to heights being maximums.</i></p>

Key Site 4 – Humber Quays

This site adjoins (and the proposed buildings at its eastern edge would lie within) the boundary of the Old Town Conservation Area. Its development, therefore, could impact upon views from the Fruit Market and Humber Dock.

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28	Para 1.5	This site adjoins the boundary of the Old Town Conservation Area. It is essential that development of this area takes account of the potential impact which it could have upon views looking westwards from the Conservation Area across the Humber Dock Basin. This should be referred to in the introductory Paragraph	Add to Paragraph 1.5:- “This site adjoins, and at its eastern edge lies partly within, the Old Town Conservation Area. The redevelopment of this area will need to address views looking westwards from the Fruit Market and Humber Dock”	<i>It is agreed the introduction to this site could be improved by these amendments.</i>
28	Key Site 4 – Design Challenges and Opportunities, Criterion b	This Criterion does not reflect the approach suggested in Paragraph 4.19 of the Supporting Information (i.e. inspiration for forms and materials could be drawn from former warehousing and boat building uses and that bold contemporary architecture could also be used to distinguish and add value to the riverfront).		<i>It is agreed that the criteria needs amended as follows ‘b. creating distinctive architecture reflective of its former warehouse/boat building use but with preference toward something contemporary in character of sufficient height befitting an open estuary frontage location;’</i>

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28	Key Site 4 – Design Challenges and Opportunities, Criterion h	The meaning of this Criterion is unclear.	Amend accordingly	<i>This criteria needs clarifying by amending it to ‘h. no self-contained apartment with habitable rooms being on the ground floor level and a place of safety being provided to address flood risks;’</i>
28	Key Site 4 – Design Challenges and Opportunities, additional Criterion	This site adjoins the boundary of the Old Town Conservation Area. The development of this site offers huge potential to enhance views across the Conservation Area looking in a westerly direction	Add the following additional Criterion:- “Enhance views looking across the Old Town Conservation Area”	<i>It is agreed this would clarify views across the area so an additional bullet point will be added.</i>
29	Key Site 3 – Challenges and Opportunities additional Criterion	The Supporting Information also states that new public art is expected.	Amend accordingly	<i>Agreed and this can be added to a revised criteria e.</i>
29	Key Site 3 Plan	<ul style="list-style-type: none"> • It would be helpful to users of this document to identify the boundary of the Old Town Conservation Area • It would be helpful to show the key views towards this site (and where particular care might be required in design terms) 	Amend accordingly	<i>A heritage assets map is included on new page 14 but details about important views and heritage assets are already provided in the Supporting Information.</i>

Key Site 5 – Myton Street

This site sits on a prominent gateway into Hull's City Centre, and the plot bounded by Ferensway, Castle Street, Myton Street and Osborne Street could take a development of some height, particularly at the junction of Ferensway and Castle Street, subject to a Views Analysis of key landmark sites within the City Centre.

This site is one of the few in the SPD that would be capable of comfortably accommodating a large footprint building such as the Ice Arena. Given that this Site already contains one of Hull's major public venues, The Venue, there may be considerable benefits if it also provided the location of the Ice Arena as well. This would help to realise the stated aim of Paragraph 5.4 of the Supporting Information about maximising the benefits associated with this landmark location so it contributes more to the perception of the City as a vital and dynamic place.

However, this site includes two Listed Buildings (Castle Street Chambers and the Earl de Grey Public House) and its redevelopment could, potentially, also affect elements which contribute to the significance of the Old Town Conservation Area to the south.

The redevelopment of this site presents an opportunity to enhance the Osborne Street car park's west elevation, currently an unattractive, utilitarian back-drop to the open space to the north-west of The Venue.

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31	Key Site 5, Design Challenges and Opportunities, Criterion d	<p>A key challenge for the development of the south-eastern block is how the new buildings will relate to the two Listed Buildings. Castle Building was designed to be a prominent corner building on one of the oldest routes out of Hull. It is essential, therefore, that the adjacent buildings to its east are not over-dominant and that this property remains the key focal point in views towards it from Castle Street. Therefore we it will need to be demonstrated that a block which is a storey higher along Waterhouse Lane is appropriate.</p> <p>We are concerned that neither the principle of relocating the Listed Earl de Grey Public House nor its proposed new location have been discussed with Historic England. This former public house is one of only a few early buildings left on the western half of Castle Street and is an important physical reminder of dock life in this part of the town. Any relocation will need clear and convincing justification. Moreover, it is not simply the tiled façade of that building which is of importance. Any future proposals for this building will also need to consider the</p>	<p>Key Site 5, Design Challenges and Opportunities,:</p> <p>(a) Amend Criterion d to read:-</p> <p>“Retain and reuse the Grade II Listed Castle Building. Proposed development alongside this Listed Building should be designed ensure that Castle Building remains the focal point at the Waterhouse Lane/Castle Street corner”</p> <p>(b) Add the following additional Criterion:-</p> <p>“The Earl de Grey Public House shall be retained and reused. If it can be</p>	<p><i>Agreed there is a need to reflect the importance of nearby listed buildings so will amend the criteria to ‘d. re-using Castle Buildings and the Earl de Grey public house with its tiled façade being visible and accessible to the public realm;’ in addition to amended criteria ‘e. the former Earl de Grey public house being retained and reused or only in exceptional circumstances such as it being required for the A63 road improvement scheme, would relocation be considered and then the most valued parts of the building would be integrated into the street scene;’</i></p>

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		<p>form of the Listed Building in the streetscape (also a key aspect of its significance).</p> <p>Given the considerations regarding the Earl de Grey Public House, it might be preferable to address the future of this particular Listed Building in a separate Criterion.</p>	convincingly demonstrated that it is not possible to retain the building in its current position, any new location should seek to retain the legibility of the form of this Listed Building in the streetscape”	
31	Key Site 4 – Design Challenges and Opportunities, Criterion e	The requirement to ‘make something significant’ on the corner rather vague. Given the likelihood that the building at the south-western corner of this site will be adjacent to a large highway intersection, a taller ‘gateway’ building at this location would be wholly appropriate.	Amend accordingly	<i>Agreed that this criteria could be clarified by amendment to criteria ‘f. making a landmark building on the Ferensway/Castle Street corner through building massing or other treatment;’</i>
31	Key Site 4 – Design Challenges and Opportunities, Criterion h	It is unclear what is meant by the term ‘consider architectural interest and detailing’	<p>Key Site 4 – Design Challenges and Opportunities, Criterion h re-word as follows:</p> <p>“Ensure that all elevations employ high quality architectural design and detailing, to maximise visual interest.”</p>	<i>Agreed and amend new criteria ‘i. incorporating architectural design and detailing to maximize visual interest on the elevations to the street or public realm;’</i>

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31	Key Site 4 – Design Challenges and Opportunities, Criterion i	This Criterion is too vague and gives any potential developer the freedom to simply demolish these buildings. Moreover, no one using this document is given any indication where these buildings are. If these buildings are important, then, in the first instance, there should be a requirement that they are retained and reused. If it is impracticable to do so, then the developer can argue the case for their removal. But the starting point should be a clear statement that they should be kept	Key Site 4 – Design Challenges and Opportunities, Criterion i amend to read:- The existing buildings of townscape value on Myton Street should be retained and reused. If it can be demonstrated that it is impracticable to reuse them, then consideration might be given to simply the retention of their facades	<i>It is considered there are no buildings of townscape value worthy of retention west of Myton Street so this criterion needs deleting although suitable frontages will be required.</i>
31	Key Site 5, Design Challenges and Opportunities, additional Criterion	The Osborne Street car park forms an unattractive, utilitarian back-drop to the open space to the north west of the venue. The redevelopment of this site presents an opportunity to enhance the car park’s west elevation, perhaps by a lush green wall.	Key Site 5, Design Challenges and Opportunities, insert an additional Criterion along the following lines;- “Development should seek to enhance the western elevation of the Osborne Street Car Park perhaps through a lush green wall” .	<i>The City Council agrees the side elevation to the car park could be improved but this is not essential to the design on the remainder of Myton Street, so no changes are proposed.</i>

Page	Section	HE Comments	HE Suggested Change	City Council responses
32	Key Site 5 – Map	<ul style="list-style-type: none"> • This site adjoins the boundary of the Old Town Conservation Area. This should be identified on this plan. • Whilst we welcome the identification of the two Listed Buildings (Castle Buildings and the Earl de Grey Public House) it would make them easier to identify if they were coloured on this map as opposed to simply being numbered. • The existing buildings of townscape merit referred to in Criterion i should be identified 	Amend accordingly	<i>A heritage assets map is included on new page 14 but details about important views and heritage assets are already provided in the Supporting Information.</i>
33	Key Site 5, Map	<p>This site is located on a prominent gateway into Hull’s City Centre, and the plot bounded by Ferensway, Castle Street, Myton Street and Osborne Street could take a development of some height, particularly at the junction of Ferensway and Castle Street, subject to a Views Analysis of key landmark sites within the City Centre.</p> <p>Whether or not a taller building is sited here, a landmark structure is called for.</p>	Amend in accordance with Revised Site 5 Myton Street Scale Plan.	<i>Agreed there is scope for a landmark building so amendment to criterion is suggested ‘f. making a landmark building on the Ferensway/Castle Street corner through building massing or other treatment;’</i>

Key Site 6 – East Bank

The redevelopment of the eastern bank of the River Hull could greatly assist in the regeneration of the Old Town, the vibrancy and vitality of Whitefriargate, and improve the setting of several heritage assets. However, the site's redevelopment could potentially, also harm elements which contribute to the significance of these assets. These include the Old Town Conservation Area and Hull's only Scheduled Monument (The Hull Citadel).

The attractiveness of this site is hampered, to some extent, by the fact that it is relatively narrow and lies adjacent to a large employment site. In order to realise the full potential that this area offers, consideration should be given to increasing the extent of the area on the eastern bank covered by this SPD. We would suggest that it provides a long-term framework for the whole of the area lying between the river and Garrison Road.

Page	Section	HE Comments	HE Suggested Change	City Council response
34	Paragraph 1.7	<p>In terms of the historic environment, this is a very important site within the City Centre and its redevelopment has the potential to help revitalise what was once the principal shopping street of the Old Town - Whitefriargate. However, redeveloping this area in a manner which also conserves those elements which contribute to the significance of the Old Town is one of its biggest challenges. These need to be recognised within this introductory Paragraph</p>	<p>Paragraph 1.7 insert the following sentence at the beginning of this Paragraph:-</p> <p>“The redevelopment of this area offers huge potential to increase footfall into the historic thoroughfare of Whitefriargate and, as a result, help to encourage its currently vacant and underused properties to be brought back again into active economic use. However, ensuring that the redevelopment of this site takes place in a manner which also conserves the setting of these assets presents one of its biggest challenges.”</p>	<p><i>Agree about amending the opening paragraph but in the following way:</i></p> <p><i>‘Residential use here offers significant scope to provide additional footfall in the Old Town, and on Whitefriargate as a thoroughfare, and as a result will help encourage vacant and underused properties back into beneficial use. Proposals should take place in a way that conserves the setting of these heritage assets.’</i></p>

Page	Section	HE Comments	HE Suggested Change	City Council response
34	Key Site 6 – Design Challenges and opportunities, Criterion b	This Criterion should include specific reference to the importance of the key views from the Conservation Area opposite including those from High Street along the staithes.	Key Site 5 – Design Challenges and opportunities, Criterion b amend to read:- “.. important views from/to the scheme especially from the Old Town Conservation Area”	<i>Agree to amend the criterion that clarifies the importance of views ‘b. making the most of important views between the scheme and the Old Town Conservation Area;’</i>
34	Key Site 6 – Design Challenges and opportunities, Criterion c	This Criterion would benefit from a slight amendment to better reflect the suggested approach set out in Paragraph 6.22 of the Supporting Information.	Amend accordingly	<i>Agree to amend the criterion that clarifies the approach in the Supporting Document to: ‘c. creating an inviting riverside promenade environment that links to public squares between buildings is key and that includes play areas/features, public art and some soft landscaping/trees;’</i>
34	Key Site 6 – Design Challenges and opportunities, Criterion f	It is unclear whether the use of the term ‘including’ means that there are other historic buildings other than those identified which should be retained and reused. If so, these need to be identified.	Amend accordingly	<i>This criterion points toward the important historic buildings but there might be others or features worthy of retention that should feature in any analysis on the site in design terms. No change is proposed.</i>
34	Key Site 6 – Design Challenges and opportunities, Criterion g	In townscape terms, the area where scale Lane Bridge ‘lands’ on the eastern bank is particularly important. However, the illustrative diagrams show this as simply being the corner of a six-storey apartment. This needs addressing in the guidance and Scale	Amend accordingly	<i>Agree to add a criterion that clarifies this point ‘i. making the most of the public realm on the landing point of Scale Lane bridge;’</i>

Page	Section	HE Comments	HE Suggested Change	City Council response
		Land Bridge ought to be focused on an area of high-quality public realm rather than the edge of a six-storey building.		
34	Key Site 6 – Design Challenges and opportunities, Criterion i	Crown Dry Dock appears to be infilled. It is unclear precisely how it is intended this dock is addressed in any proposals for this area. This Criterion needs to be more specific.	Amend accordingly	<i>The intention is to retain the Dry Dock and for proposals but it will be for developers to make the most of this opportunity. Agree to amend the criterion and have a new reference as follows:</i> <i>‘d. retaining and ensuring the Crown Dry Dock becomes a key feature of the public realm;’</i>
34	Key Site 6 – Design Challenges and Opportunities, additional Criterion	To the east of Tower Lane, is a Scheduled Monument (Hull Castle, South Blockhouse). It has been established from previous archaeological evaluation that deep, waterlogged and complex archaeological deposits survive in a good state of preservation in this location. Typically these deposits consist of a sequence of medieval timber waterfronts with their associated buildings and activities. The archaeological picture is further complicated on the east side of the Hull where the medieval and Tudor defences of the town and port are located. Historic England has no hesitation in considering all these deposits to be nationally important and it is therefore essential that any development along the River	Key Site 5 – Design Challenges and opportunities, additional Criterion:- “Potential for important archaeology”	<i>Agree and can add an additional criterion ‘k. evaluating the potential for and deal with important archaeology.’</i>

Page	Section	HE Comments	HE Suggested Change	City Council response
		Hull is informed by an appropriate scheme of sampling, survey and evaluation to establish the significance of the site.		
34	Key Site 6 – Design Challenges and Opportunities, additional Criterion	The Supporting Information sets out a series of considerations regarding the character and form of any proposed development on this site. An additional Criterion should be added setting out the design considerations expected of any development proposals.	Amend accordingly	<i>It is agreed that further details provide the clarity needed in better meeting those set out in the Supporting Document.</i>
35	Key Site 6 – Plan	<ul style="list-style-type: none"> This site adjoins the boundary of the Old Town Conservation Area and there are numerous Listed Buildings within and opposite this site. In addition, there is a Scheduled Monument to the east of Tower Street. To assist users of this document, these should be identified on this plan. The historic buildings which should be retained which are referred to in Criterion f should be identified. The key views referred to in Criterion b should be identified. 	Amend accordingly	<i>A heritage assets map is included on new page 14 but details about important views and heritage assets are already provided in the Supporting Information.</i>

Key Site 7 – Dock Office Row

This site lies within the Old Town Conservation Area and includes a number of Listed Buildings including the Grade II* Listed Blaydes House. The numbers of people visiting this part of the City are likely to increase substantially as a result of the proposed Yorkshire Maritime City project. Therefore, one of the most important considerations in any redevelopment of this area will be how people access this new tourist destination from the rest of the City and what experience they are likely to get when they arrive.

Any redevelopment of this area should be predicated on creating a townscape sympathetic to the character and scale of the listed and unlisted historic buildings. Any development should also take account of the footprint and scale of earlier buildings on the site, and their generally perpendicular relationship to the River Hull.

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37	Paragraph 1.8	Any redevelopment of Dock Office Row should be predicated on creating a townscape sympathetic to the character and scale of the listed and unlisted historic buildings.	Paragraph 1.8 amend to read:- Re-word as follows:	<i>Agree the introduction could be amended to 'This site has links to the city's historic maritime past and is now the focus for mixed uses including housing but centred on a new Yorkshire Maritime Project. Designs should respond to the scale and character of the historic dockside buildings and structures. A key issue will be to improve pedestrian connectivity within the Old Town and, in particular, the crossing at Clarence Street but other connections will have to be addressed.'</i>

Page	Section	HE Comments	HE Suggested Change	City Council response
		<p>Any development should also take account of the footprint and scale of earlier buildings on the site, and their generally perpendicular relationship to the River Hull.</p>	<p>“This area historically was the focus of an important earlier phase of Hull’s maritime development and is now the focus for mixed use and residential opportunities, centred around the new Yorkshire Maritime Project. Designs should respond to the scale and character of the historic dockside buildings and structures in a manner which will complement people’s experience of the Yorkshire Maritime Project. A key issue will be to improve pedestrian connectivity with the Old Town and, in particular, the crossing at Clarence Street”.</p>	

Page	Section	HE Comments	HE Suggested Change	City Council response
37	Key Site 7 – Design Challenges and Opportunities, General	<p>The numbers of people visiting this part of the City are likely to increase substantially as a result of the proposed Yorkshire Maritime City project. Therefore, one of the most important considerations is how people access this new tourist destination from the rest of the Old Town area and what experience they get when they arrive. There should be an intention to remove traffic, completely, from the southern part of High Street (as far as the former Dock Offices) and for Dock Office Row to become a ‘shared space’ in which pedestrians are given priority over vehicles.</p> <p>It is suggested that this is referred to in the Design Challenges and that Criteria e and f are amended appropriately.</p>	Amend accordingly	<i>Although off-site it is agreed that connection between the site and the rest of the Old Town will be important but this should not result in the complete removal of traffic on Dock Office Row/High Street, so no change is suggested.</i>
37	Key Site 7 – Design Challenges and Opportunities, Criterion d	<p>The requirements relating to heritage assets are a little vague and it would be preferable if this Criterion set out rather more specifically what is required.</p> <p>The reference to ‘heritage assets’ presumably indicates that there are non-designated heritage assets which should be retained. These ought to be identified on the map on page 38</p>	<p>Key Site 7 – Design Challenges and Opportunities, Criterion d amend to read:-</p> <p>“The Listed Buildings and other structures identified as being of historic interest shall be retained and reused. New buildings in their</p>	<p><i>Agreed that greater clarity would help by improving the criterion in making a new criterion as follows:</i></p> <p><i>‘e. making the most of the existing heritage assets including listed buildings and other key heritage structures to be retained and reused preferably in situ;’ along with other changes to criterion c, d and k below.</i></p>

Page	Section	HE Comments	HE Suggested Change	City Council response
			vicinity should relate sensitively to them in terms of their design and detailing	
37	Key Site 7 – Design Challenges and Opportunities, Criterion i	Safety fencing has the potential to appear incongruous around a historic dock and, if poorly designed, could detract from the maritime character of this area. Therefore, such fencing should be permitted only where it can be demonstrated to be essential for public safety and is of a design which does not detract from the character of this area.	Key Site 7 – Design Challenges and Opportunities, Criterion i re-word as follows: “Any safety fencing around the dry docks will need to be shown to be essential for public safety and be of an appropriate design for a historic dockside area”.	<i>There is a reference to proposals responding to ‘the maritime importance and river setting including integrating the public realm’ in new criterion d which covers this point in general without the need to be overly prescriptive.</i>
37	Key Site 7 – Design Challenges and Opportunities, Criterion m	This Criterion is a little vague and a prospective developer merely has to explore the possibility of continuing the riverside promenade without actually having to actually implement anything.	Key Site 7 – Design Challenges and Opportunities, Criterion m re-word as follows: “Continue the western bank riverside promenade.”	<i>A public riverside promenade is not likely to be provided so this criterion should be removed.</i>

Page	Section	HE Comments	HE Suggested Change	City Council response
37	Key Site 7 – Design Challenges and Opportunities, additional Criterion	<p>The Council’s Local Buildings List includes the Dry Dock (former Queen's Dock Basin) and the 'Scotch' type derrick and states that it is included on the list as it is historically important for being the last major relic of Hull's first enclosed dock and for being the last 'Scotch' type derrick in the Old Town - a distinctive port-related feature and a rare reminder of Hull's shipbuilding past. Whilst the dock, itself, is referred to in Criterion b, no reference is made to the derrick (although the plan on page 38 shows it relocated to a new position to the east of the former Dock Offices). This is an important feature of this part of the City and what happens to it as part of this redevelopment should be referred to in one of the Criteria.</p> <p>Since this derrick is closely associated with this particular dock, any proposals should, in the first instance, seek to retain it in situ.</p>	<p>Key Site 7 – Design Challenges and Opportunities insert the following additional Criterion:-</p> <p>“The 'Scotch' type derrick on the former Queen’s Dock Basin shall be retained in situ and refurbished. Its relocation to an alternative dry dock in this area may be considered if this would result in a better form of development which would bring benefits to the visitor experience of this area”</p>	<p><i>Agree to revise the criterion to clarify the intentions for the site including revisions to criterion b. regarding the crane which should also be referred to as ‘crane retained but relocated’ in drawing on new page 40, but also by adding new criterion:</i></p> <p><i>‘d. taking account of the footprint and scale of earlier buildings and their generally perpendicular siting and relationship to the River Hull and responding to the maritime importance and river setting, including integrating public realm, use of materials, public art installations and sensitively relocated the locally listed crane;’</i></p>
37	Key Site 7 – Design Challenges and Opportunities, additional Criterion	<p>The design of the building at the junction of High Street with Clarence Street is of crucial importance if this new Maritime Quarter is to be visually well-linked to the remainder of the visitor attractions on the southern part of High Street.</p>	Amend accordingly	<p><i>Agree and add a criterion:</i></p> <p><i>‘c. creating a landmark building on the High Street/Clarence Street corner that also visually links to the character along High Street as well as reinstating other important frontages;’</i></p>

Page	Section	HE Comments	HE Suggested Change	City Council response
		This needs to be referred to as one of the Design Challenges.		
37	Key Site 7 – Design Challenges and Opportunities, additional Criterion	Any redevelopment of Dock Office Row should be predicated on creating a townscape sympathetic to the character and scale of the listed and unlisted historic buildings. Any development should also take account of the footprint and scale of earlier buildings on the site, and their generally perpendicular relationship to the River Hull and respond to the maritime importance and river setting This needs to be addressed in one of the Criterion based upon the assessment in Paragraph 7.16 of the Supporting Information.	Amend accordingly	Agreed to clarify the nature of enhancement required by adding an additional criterion as follows: <i>‘d. taking account of the footprint and scale of earlier buildings and their generally perpendicular siting and relationship to the River Hull and responding to the maritime importance and river setting, including integrating public realm, use of materials, public art installations and sensitively relocated the local listed crane;’</i>
29	Key Site 3 – Challenges and Opportunities additional Criterion	The Supporting Information also identifies a number of other important considerations which ought to be addressed. These include:- <ul style="list-style-type: none"> • The use of materials • Approach to the public realm • Public art 	Amend accordingly	Agreed to clarify the nature of enhancement required by adding an additional criterion as follows: <i>‘d. taking account of the footprint and scale of earlier buildings and their generally perpendicular siting and relationship to the River Hull and responding to the maritime importance and river setting, including integrating public realm, use of materials, public art installations and sensitively relocated the locally listed crane;’ and reference to materials by adding new criterion ‘k. the consistent use of materials to surfaces and lighting on the riverside promenade.’</i>

Page	Section	HE Comments	HE Suggested Change	City Council response
38	Key Site 7 – Plan	<ul style="list-style-type: none"> • This site lies within the Old Town Conservation Area and there are numerous Listed Buildings within and adjacent to this site. To assist users of this document, these should be identified on this plan. • This plan should also identify the non- designated heritage assets which are referred to in Criterion d • The crane that it is intended to retain is shown adjacent to the wrong dry dock. • The important views to and from this scheme which are referred in Criterion a should be identified 	Amend accordingly	<i>A heritage assets map is included on new page 14 but details about important views and heritage assets are already provided in the Supporting Information.</i>

Key Site 8 – High Street

This is a key site linking the Fruit Market with the Museums Quarter and, as a result, its redevelopment could help to encourage greater pedestrian movement between these two areas. Given its position, it is also important because it will be one of the first City Centre buildings visitors to the City will see when crossing Myton Bridge.

Given the prevalence of the long, narrow warehouses, interspersed with staiths on High Street, it is unclear why a courtyard built form is proposed.

Page	Section	HE Comments	HE Suggested Change	City Council response
40	Paragraph 1.9	This is a key site linking the fruit Market with the Museums Quarter and, as a result, its redevelopment could help to facilitate greater pedestrian movement between these two areas. Given its position, it is also important because it will be one of the first buildings within the City Centre which visitors will see when crossing Myton Bridge, over which can be viewed the tower of Hull Minster. The importance of this area should be set out in the introductory Paragraph	Amend accordingly	<i>Agreed to amend the introduction to better reflect the local character and intentions as follows: 'This is an important gap site that lies alongside the River Hull and High Street but within the historic Old Town. Its development should reflect the sites prominence next to Myton Bridge and on High Street, making it highly visible to visitors on its approach from the A63.'</i>
40	Key Site 8 – Design Challenges and Opportunities, general	There is a view across this site of the tower of Hull Minster from Myton Bridge – one of the first views which those travelling westwards on the A63 east have of the City Centre. Given its elevated position relative to this site, the design of the roof is a particularly important consideration and it is important that the roofscape relates sensitively to that of the surrounding buildings in this part of the Old Town.	Add two additional Criteria one which sets out the approach expected in terms of the views towards the tower of Hull Minster and the other the approach to the roofscape.	<i>Views toward the Hull Minster tower may be something that could be incorporated into designs but this needs to be balanced with views from the scheme taking account of the road and nearby buildings plus there is strong likelihood East Bank proposals will obscure most of the views on approach from the east in any case, although a new criterion can be added to reflect the relationship of this site to the scale and form of buildings</i>

Page	Section	HE Comments	HE Suggested Change	City Council response
				<p><i>nearby:</i></p> <p><i>'b. roofscape being designed in such a way that it relates well to the surrounding buildings in this part of the Old Town;'</i></p>
		How the design of the site addressed these views is a key consideration which any development will need to address.		
41	Key Site 8 – Plan	<p>This site lies within the Old Town Conservation Area. To assist users of this document, the boundary of the Conservation Area should be identified on this plan.</p> <p>The important views across this site from Myton Bridge towards the tower of Hull Minster. This view should be identified on this plan.</p>	Amend accordingly	<i>A heritage assets map is included on new page 14 and reference is made to complementary roof scapes with new criterion b above.</i>
42	Key Site 8 – Plan showing building heights	The Supporting Information notes that the Old Town is characterised by buildings of 4 or 5 stories. It is unclear, therefore, why it is proposing a building a storey higher than the remainder of High Street.	Amend accordingly	<i>Building heights are referenced in the SPD as being 'maximums' in new paragraph 2.2 but the bridge and adjacent apartments might suggest something different.</i>

Key Site 9 – Wincolmlee

This site lies to the east of the Charterhouse Conservation Area which includes a number of Listed Buildings including the Grade I Listed Charterhouse. The redevelopment of this site presents an opportunity to improve the wider setting of these assets.

The riverside location offers the opportunity to introduce both apartments and family housing, and to deploy well-articulated development to give visual and architectural interest to both the street and river frontage. However, the current proposals appear overly uniform, monolithic and homogenous and entirely fail to reflect the site’s earlier, highly variegated historic townscape.

Page	Section	HE Comments	HE Suggested Change	City Council comments
43	Paragraph 1.10	The introductory paragraph requires clarification and should be less tentative	Paragraph 1.10 re- word as follows: The long narrow shape of this site provides some design challenges which could be overcome by providing a mix of residential blocks and family townhouses that align to the road and riverside in a way that responds to the nearby Listed Buildings and Conservation Area and riverside. Given the constraints	<i>Agree with the rewording to clarify intentions: ‘The long narrow shape of this site provides some design challenges which could be overcome by providing a mix of residential blocks and town houses that align to the road and riverside in a way that responds to the nearby Listed Buildings and Conservation Area. The development of the site presents an opportunity to improve the setting of these assets. Given the physical constraints limited parking is required.’</i>

			on the site only very limited parking is required”.	
43	Key Site 9 – Design Challenges and Opportunities, additional Criterion	An important consideration is how the development relates to the river and to views from North Bridge. This should be addressed in a new Criterion.	Amend accordingly	<p><i>It is agreed that proposals should relate to the river and views so an amended criterion is suggested as follows:</i></p> <p><i>‘a. providing a layout that provides visual and architectural interest to the street and river frontage reflective of the sites earlier highly variegated historic townscape;’ but also to reflect the local characteristics;</i></p> <p><i>‘b. creating buildings that may well include apartments but could equally be subdivided with vertical emphasis but avoiding monolithic forms and long inactive ground floor frontage to Wincolmlee or the River Hull;’</i></p> <p><i>Reference will also be made to ‘indicative built footprint’ rather than ‘proposed buildings’ in the key in order to avoid the implication that large block buildings are the only response to the design challenges here. The amendment to the key should be reflected more generally in the SPD.</i></p>

44	Key Site 8 – Plan	<p>To assist users of this document, it would be helpful to identify the Conservation Area and Listed Buildings.</p> <p>The location of the ‘stone chair’ referred to in Criterion c should also be identified on this plan</p>	Amend accordingly	<i>A heritage assets map is included on new page 14 and reference to the stone chair is proposed revisions to drawing on new page 46.</i>
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Appendix D – Environment Agency

We have reviewed the draft City Centre Key Sites Design Guide and the supporting information and have the following advice:

1. Albion Street

This site is at risk from high depths in a breach of the defences and small areas of the site may also be at risk from surface water. A sequential approach should be applied to the site, locating the 'more vulnerable' uses on upper floors.

2. Blackfriargate

Very high flood depths are predicted across this site, particularly to the east, where the risk is not just a residual risk of a breach in the defences. If residential development is proposed to the west of the site, we recommend that it is restricted to upper floors, due to the high predicted flood depths, which may otherwise be challenging to mitigate.

3. Portside

We are supportive of Point G within the SPD, which states that ground level uses should activate the waterside and which will keep residential use to upper floors. The supporting information proposes a degree of transparency to the design, using glass and steel. In order to accommodate this, the buildings will need to be carefully designed to provide the necessary flood mitigation – perhaps through internal ramps / raised floors.

4. Humber Quays

We support the proposed ground floor office use, restricting habitable accommodation to upper floor and the use of undercroft parking rather than ground floor apartments, due to the site's proximity to the estuary. We agree that, where residential use is proposed on the ground floor, this must be as part of a duplex, ensuring all sleeping accommodation is on upper floors only.

5. Myton Street

We are supportive of Point O within the SPD and recommend all sleeping accommodation within the hotel is provided on upper floors, due to the high flood depths predicted for this site.

6. East Bank

Point K, within the SPD, states that ground floor residential use is encouraged. However, we consider that it can only be encouraged where it is appropriate in flood risk terms. No sleeping accommodation should be provided on the ground floor. Where flood depths are not able to be excluded entirely from the buildings, we recommend that residential development is restricted upper floors. We support the aim of making the most of the riverside location and the required 8m easement from the River Hull should help to achieve this.

7. Dock Office

We are supportive of Point G, although we suggest the rewording of '100 year risk standard' to '1 in 100 annual probability standard of protection over the lifetime of the proposals'. Given that the site could be subject to depths above 1.2m, habitable uses should be restricted to upper floors, as suitable flood mitigation could be challenging. As a minimum, all sleeping accommodation must be on upper floors.

8. High Street

We support the use of undercroft parking, with all residential uses on upper floors.

9. Wincolmlee

The design of this narrow site will be challenging, due to the 8m easement required from the toe of the river defences, which must be kept free of all permanent structures to allow inspection, maintenance and other future works to the defences. We fully support residential development on upper floors, with less vulnerable uses, such as car parking, below.

10. Colonial Street

Ground floor sleeping accommodation may not be appropriate here, due to high predicted flood depths.

11. Anlaby Road / Park Street

Ground floor sleeping accommodation may not be appropriate here, due to high predicted flood depths.

12. Ice Arena

Finished floor levels should be raised to ensure all residential development stays dry in a flood event, ie. to 600mm above average site or road level, whichever is higher. All sleeping accommodation should be on upper floors. We would support the use of townhouses in this location, keeping habitable rooms on upper floors.

NB. We will only support the development of this site if it is shown to be appropriate, following the application of the Sequential and Exception Tests.

The City Council works closely with the EA in assessing flood risks for development in the city. There are policies in the Local Plan that seek to minimise and manage these risks but reference can be made to habitable rooms at ground floor level not being suitable for residential uses within the city centre including at Humber Quays, 'upgrading flood defences to meet a 100 year risk standard over the life of the development' at Dock Office Row. Reference will also be made to the flood risk policy requirements relating to proposals at the Ice Arena site by adding 'subject to proposals meeting sequential and exception tests' to the introductory paragraphs in 1.13 on new page 54.