

Appendix 1



Hull Local Plan: 2016 to 2032

Environmental Quality Supplementary Planning Document

Consultation Statement - addendum

March 2019

Background

- 1.1 In preparing Supplementary Planning Documents (SPDs) the Council is required to follow the procedures laid down in the Town and Country Planning (Local Planning) (England) Regulation 2012.
- 1.2 Regulation 12 states that before adoption of a SPD the local planning authority must prepare a statement setting out:
 - the persons that the local authority consulted with when preparing the SPD;
 - a summary of the main issues raised by those persons; and
 - how those issues have been addressed in the SPD.
- 1.3 The Consultation Statement and accompanying Draft SPD 3 – Environmental Quality was made available for final public consultation prior to adoption between Monday 6th February and Monday 6th March 2019.

Consultation responses and main issues

- 1.4 Following the four weeks consultation period the Council received 3 further representations. These representations were submitted by CH2M on behalf of Simon Geoghegan from Highways England, Ian Smith on behalf of Historic England and Kate Wheeler on behalf of Natural England. A summary of these representations together with the Council's response to them is contained in Appendix 1.
- 1.5 The main issues raised through the consultations were:
 - the Air Quality Management Area (AQMA) on the A63/A1033 - Highways England's main concerns are how the SPD deals with air quality at specific strategic road network (SRN) locations, particularly in terms of Castle Street and whether appropriate mitigation measures are covered in it;
 - information needed to determine the likely effects of a development - Natural England suggests additional information that it considers

should be provided by a developer to support a development scheme that could have potential impacts upon the Humber Estuary SAC; and

- incorporating green infrastructure provision as a mitigation measure - Natural England suggests that more guidance is needed on how to incorporate green infrastructure in development schemes to achieve a better environment.

Changes to the SPD

4.1 The response to the consultation has been considered in preparing the final SPD and the following changes have been made to the document (see table below):

Appendix 1: Summary of representations

Respondent	Comments Received	Council Response
CH2M	<p>Task Overview - CH2M state that the key for Highways England (HE) is relieving the problems of traffic congestion and pollution and mitigating such impacts accordingly.</p> <p>Introduction - HE has a priority to maintain a modern and reliable road network and to this aim they need to understand the traffic implications from key development sites in Hull. If a significant amount of traffic is generated from new allocations this could cause problems of congestion and over capacity on the SRN which in turn contributes to the problem of poor air quality and pollution on Castle Street.</p> <p>Paragraph 1.7 of the SPD deals with developments which may have significant effects on the environment and may fall within the scope of the Environmental Impact Assessment Regulations and CH2M state that for any such application, an appraisal of the transport impact of the development on the surrounding network would also be required to support the development proposals where appropriate.</p> <p>Policy Background - HE main concern within this SPD and their response to it is Policy 47 (<i>Atmospheric Pollution</i>).</p> <p>HE supports paragraph 2.6 and in particular its reference to the Hull Local Transport Plan (LPT). They welcome the LPTs Objective 4 which is <i>'to promote a healthier city through improving air quality and encouraging active travel'</i>.</p> <p>HE acknowledges that a city-wide action plan to tackle the NO2 issue has been developed by HCC with other key stakeholders including themselves. They welcome that they have been invited to comment on this SPD and will welcome ongoing discussions with HCC, where appropriate, with regards to the A33/A1033.</p>	<p>Comment noted.</p> <p>Amend paragraph 1.7 and add the following text "Alongside the aforementioned EIA process requirements, for such developments, and particularly where major developments are proposed, a Transport Impact Appraisal on the SRN will also be required to support the development proposals where appropriate." after the text "and the steps required under regulation 26 (of this act)', though this requirement is a separate process and an EIA will be considered along with any other information required by this SPD."</p> <p>Support noted and <i>welcomed</i>.</p> <p>Support noted and <i>welcomed</i>.</p>

Respondent	Comments Received	Council Response
	<p>HE are supportive of the LTP's aim to limit congestion in the AQMA by requiring that any planning application that has a potential impact on traffic levels take into account policies within the LTP, in particular opportunities for mitigation.</p> <p>Applying the Policies - HE welcomes the SPDs recommendation that applicants/agents have pre-application discussions prior to submitting a full/outline application and would appreciate being involved in such discussions for forthcoming proposals.</p> <p>Paragraph 3.3 states that the LP has a list of allocated sites (in Table 2 of the SPD) which would require an Air Quality Assessment to accompany a development proposal, CH2M point out that these sites are of potential concern for HE, given their proximity to the SRN also. They highlight that several of these sites are of '<i>possible concern</i>' or '<i>of concern</i>' to HE and recommend that a trip generation and distribution assessment accompany any development proposals for all these allocated sites in Table 2, alongside appropriate mitigation measures should these assessments find that the development generates significant additional traffic.</p> <p>HE supports the mitigation measures outlined in paragraph 3.15 as these will aid in reducing the number of vehicles and their potential impact on the SRN.</p>	<p>Support noted and welcomed.</p> <p>Support noted and welcomed.</p> <p>Amend paragraph 3.3 to include the following text "Alongside an air quality assessment, for all sites included in Table 2, a trip generation and distribution assessment will also need to be provided so that the Statutory Consultee Highways England can ascertain whether the associated traffic generation and distribution is not detrimental to the SNR. And if this assessment does demonstrate that the proposal would generate significant additional traffic, then appropriate mitigation measures should be submitted with any subsequent planning application." after the text "These are listed in Table 2 below (and see Appendix B, C and D for location maps of allocated sites)."</p>
Ian Smith	Thank you for consulting Historic England about the draft Environmental Quality SPD. We have no comments to make regarding its contents.	Support noted and welcomed.
Kate Wheeler	Natural England advises that additional information should be provided by applicants to support developments near European Sites.	Comment noted

Respondent	Comments Received	Council Response
	<p>Natural England welcomes the references in the SPD to improve air quality or mitigate impacts, such as through traffic and travel management, and green infrastructure (GI) provision and enhancement. This links closely with sustainable transport within Hull, the use of GI to connect to or incorporate an existing or planned network, such as walking and cycling routes, which should help reduce the reliance on more polluting transport. But they feel the SPD could provide more guidance on how to incorporate GI into proposals to achieve a better environment.</p>	<p>Amend paragraph 3.26 to include the following bullet point and text “</p> <ul style="list-style-type: none"> • the magnitude and scale of the development (once known), using an appropriate air quality modelling technique, and what effect this would have on the Humber Estuary SAC taking into account information such as: the sensitivity of the notified or interest features and the most appropriate environmental benchmarks for each feature on the designated site (e.g. site relevant critical levels and critical loads). It is recommended that this is done using the Air Pollution Information System (www.apis.ac.uk) to obtain information about site/habitat sensitivity (e.g. critical loads and levels for ecosystem protection.” <p>after the text contained after the second bullet point.</p> <p>Amend paragraph 3.15 to include the following text “for further</p> <p>guidance on incorporating green infrastructure into development proposals see Natural England’s ‘Green Infrastructure Guidance (NE176) - available on Natural England’s website at http://publications.naturalengland.org.uk/publication/35033. (Please note that this report refers to planning policies that have now been surpassed by the National Planning Policy Framework).” after the text “using green infrastructure, in particular trees, to absorb dust and other pollutants”</p>