

Our ref: General 40b – Planning Conformity/final responses/local development frameworks/Hull CCAAP Pref Options Sept 06

6 September 2006

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Dear Keith

### **Hull City Centre Area Action Plan: Preferred Options**

Thank you for consulting the Assembly on the Hull City Centre Area Action Plan Preferred Options document. As you know, we are committed to working with local authorities in the preparation of their Development Plan Documents early on in the process, before we have to offer a formal opinion of general conformity with the Regional Spatial Strategy (RSS) at submission stage. At this point in the process, the Assembly response to consultation is an informal officer response highlighting any key issues that we think might need further attention.

Because we are in a moment of time when there is an existing and an emerging RSS, the Assembly comments are based on both documents. The comments place emphasis on draft RSS, which reinforces and develops the general thrust of existing RSS; furthermore it is more up to date and has significant 'weight' in its own right. The weight attached to the draft RSS will increase as it passes through its Public Examination (September and October 2006) and once the Panel's Report is received (expected Spring 2007) before it is issued by the Secretary of State (expected Autumn 2007).

We have concentrated our comments on the Hull City Centre Area Action Plan (CCAAP) as a Development Plan Document and have not offered any comments on the Supplementary Planning Documents that are also out for consultation. Our comments are related to the aspects of the CCAAP that we feel are more strategic than local.

### **Overall**

It is clear that the CCAAP is a very thorough piece of work that has been in preparation for some years. It contains some important policy changes for Hull and some very ambitious proposals that are well justified and necessary to achieve the strategy for the City Centre. Furthermore it will help to help achieve the strategies of the RSS, Northern Way and national policy aspirations.

We welcome the way in which the relevant RSS policies are identified and it is clear that the CCAAP has been drawn up within its wider spatial planning context.

## **Specific comments**

### *Vision and objectives*

The CCAAP identifies the unique capabilities of the City Centre to contribute to the wider area and makes a very convincing case for the City Centre locations to be prioritised based on the principles of concentration of development, mix of uses, critical mass and sustainability.

The Vision and Objectives demonstrate a close alignment with RSS. It is particularly important that the historic lack of focus on the city centre is now to be changed, ensuring that the CCAAP will help to deliver the Core Policies of Draft RSS.

### *A63*

It is recognised in the CCAAP that a major constraining issue for the area is the A63 trunk road [Castle Street], which performs a nationally significant role in accessing the port but also in servicing the City Centre. Policy T7 of Draft RSS supports the A63 improvement programme and the scheme is a funding priority for the region.

### *Flood Risk*

Flood Risk is clearly a major issue for Hull City Centre. The preparation of a Strategic Flood Risk Assessment will be an important tool in helping to determine how the CCAAP can be delivered. Policy ENV1 B of Draft RSS makes it clear that appropriate flood management will be needed to facilitate development in areas such as Hull.

### *Housing*

The target of 3000 houses for the CCAAP (2003-2016) would appear to be in general conformity with the Draft RSS figures.

## **Concluding comments**

In conclusion, the Preferred Options document appears to be in general conformity with RSS. At this stage, it might be worth noting some issues with regards to its relationship with other planning policy documents and the alignment of programmes through a coherent city-wide planning strategy.

Given the relatively recent date of issue for the Hull and East Riding Joint Structure Plan, it is appropriate that this is currently providing the strategic spatial plan - the 'Core Strategy' - for the area. It is essential, however, that the implementation of the CCAAP is enabled by policies of restraint on, for example, retail and leisure developments elsewhere. A city-wide planning strategy would clearly help in this regard. Such a strategy would also provide a planning context for the implementation of programmes such as the HMR. Until city-wide housing policies are established, it is perhaps difficult to judge whether the housing policies of the Draft RSS will be implemented.

Given the scale and complexity of the regeneration programmes needed in Hull, it is clearly essential that complementary programmes are well co-ordinated, especially on an area-by-area basis. It is hoped that the CCAAP will be one of the suite of documents that will provide the spatial context that helps these programmes to be successfully implemented.

I hope that these comments are helpful to you. Please do not hesitate to get in touch if anything is not clear. We look forward to working with you further on your City Centre Action Plan.

Regards

A handwritten signature in blue ink, appearing to read 'Jenny Poxon', written in a cursive style.

Jenny Poxon  
Head of Planning Delivery and Conformity