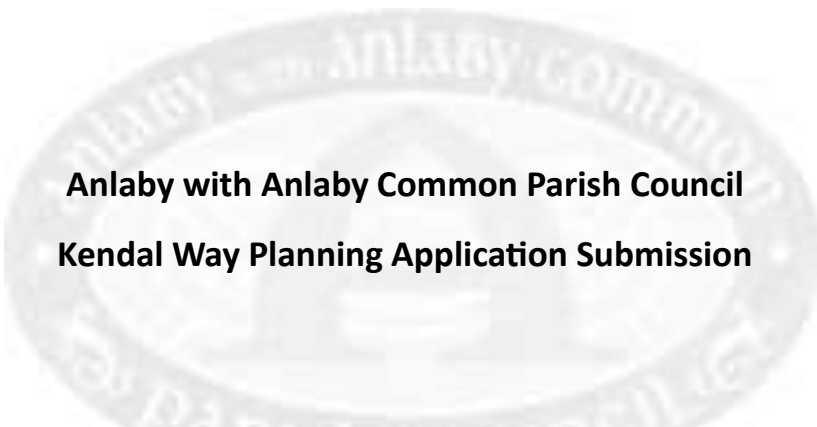




Anlaby with Anlaby Common Parish Council

Kendal Way Planning Application Submission

Introduction

This document sets out the Parish Councils response to Planning Application HCC 25/00581/OUT received by Hull City Council in October 2025. The application looks for approval to build 66 dwellings on the disused Smith and Nephews Recreation Ground at the rear of properties on Kendal Way, HU4 7TA. The site straddles the boundary between the East Riding and Hull City Councils, with part of it being covered by the Anlaby with Anlaby Common Parish.

Submission

The Anlaby with Anlaby Common Parish Council, a nonpolitical body comprised of local residents, have the following observations and concerns connected with the application to build 66 Dwellings on land adjacent to Kendal Way, HU4 as follow:

- It is an over development of the land at that specific locality.
- The flooding risk.
- The congestion risk.

Over Development

This site has been the source of many applications over the last 25 years. The Parish Council recognise it is a site prime for development but wish to emphasise that this site was once a recreation ground providing valuable open space in an area which has few such small-scale local facilities for residents.

Hull City Councils planning committee are reminded of the last application for this site in 2004 which was approved. This application had markedly fewer houses and included proposals for sport pitches, a pavilion, changing facilities, car parking and assurances that community use would be supported.

The Parish Council believe that such a scheme is better suited to the site, rather than this larger development with an associated Community Infrastructure Levy payment for the provision of such facilities locally, as it is doubtful there is room for such community focused facilities to be provided for the benefit of the adjacent local community directly affected.

The supporting documentation, from a number of sources, makes many references to the National Planning Policy Framework (NPPF) in a tone which vindicates overruling local concerns and recognised issues with the locality and the site itself. These are covered in more detail below as it is important that, while national directive and house building is important, this should not be at the expense of ignoring or not dealing with legitimate and founded concerns local residents have about how the development will affect their neighbourhood.



As regards the scale of the development. The documentation does outline that 66 dwellings on the site is equal to c26 houses per hectare and the Parish Council recognise that this is below the 30 to 35 houses per hectare expected nationally.

But the Parish Council believe that the associated factors connected with the flood risk and local transport/traffic impact would warrant a considerable reduction in the number of properties so that any risks identified by local residents would be appeased to a degree. These are factors unique to this site and therefore the NPPF guidance can be derogated.

Flood Risk

It is natural that this is a very emotive subject for our local residents and the Planning Committee will see the strength of feeling from the comments made via the planning portal.

The Parish Council share's the concerns of the local residents.

It is clear that many of the local residents, some of whom are very long standing and have vivid memories of past flooding events, know this site well through familiarity and years of observations.

Their comments should not be simply overruled by NPPF Guidance and technical abstract scientific theory and modelling of biblical flood event scenarios.

It is noted that flooding attenuation is being provided on the site but, even with this provision, the Flood Risk Assessment document does identify that the houses, to pass the NPPF Guidance, need to be constructed with additional features with a flooding event in mind.

This indicates, to the Parish Council, that a flooding event cannot be ruled out and is more likely than not as evidenced by the advice that all the properties are built with non-return airbrick at 900mm above ground, watertight external doors are installed, non-return drainage valves are used, service entries are 1200mm above ground and all electrical sockets are installed over 1200mm from the floor.

Furthermore, it also advises that all the houses should be built with floors 900mm above site levels.

These factors together mean that water would have to reach a height of 1.8 meters above ground level before it would materially affect the new built homes. A benefit the residents of the surrounding streets, who would also be affected by such flooding, do not have.

It does not comment on the number of dwellings on the site as a contributing factor. Nor does it deal with the hard landscaping contribution to flooding, from driveways and car parking provision evident in the plans submitted.

It therefore seems to omit any factors connected with the holistic development which would reduce the flood risk, presumably because these are not covered by building regulations. For example: scenarios around a larger flooding attenuation scheme versus fewer houses or reduced hard landscaping per property are not mentioned, presumably because these affect

the commercial viability of the proposal and site if exposed for resale once planning approval is secured.

It is important to highlight, in support of the local residents, that it is believed that such flooding events would become more likely as a result of this proposal. Also, their houses would be more adversely affected than those built as a result of this proposal due to the measured advised in the Flood Risk Assessment Report.

It is also important to emphasise that many of the local resident's stress that this site, in its current state, acts as an ad-hoc rain catchment pool thereby reducing the risk of flooding locally. Building on this site in the way described in this proposal would remove this asset.

All these factors are important in relation to the Flood Risk Exception Test defined in the NPPF.

These factors, coupled with well-founded considerable resident unease in relation to the increased flood risk, means that this subject needs careful and thorough investigation.

Therefore, the Parish Council would like to see this issue investigated in-depth by experts who are independent of the development process and that this investigation looks at the issues from a holistic neighbourhood perspective, including the neighbouring properties on all sides.

Doing this will go some way to reassure residents and deal with their real fears in relation to the increased flooding risk.

Travel and Traffic

The Parish Council notes that the Travel Report and associated discussions with the council dating back some years are focused mainly on sight lines around the main entry to the site and whether it is technically correct.

As a sidebar, and with heavy reliance on the Trip Rate Information Computer System (TRICS) Database, the congestion and traffic created as a result of this development have been modelled and predicted.

It is noted that advice from the NPPF comes to the fore again as to how local concerns should, or more accurately should not, be dealt with.

Additionally, the Parish Council is aware of the last two Planning Appeal Inspectors reports, dated 1995 and 2002, and that both of these deal with the issues of increased traffic generation and it was not thought to be significant some 23 and 30 years ago.

With this backdrop it is important to note that many local residents highlight that the local road network has seen a considerable increase in vehicular traffic in the last 20+ years, a perspective the Parish Council concurs with and supports.

With reference to the Travel Report and associated emails around a local traffic survey of the area, including Kendal Way and Hawkshead Green. It appears that this survey was a singular

activity and mainly focused on the issues connected with the junction design for the main single access road to the site.

As the issue of the additional traffic generated from such a relatively large scheme was to be a key issue the Parish Council is very uneasy around a planning decision being made on such limited data.

This development is doubling the number of houses which need to be serviced by the local road network at this location. Simply put, due to the composition of the local resident mix it has the potential to more than double the traffic locally.

Issues are compounded locally by the whole site being primarily serviced by a single narrow road in the form of the southern part of Kendal Way.

A further key issue is that the modelling used to predict journeys to and from the site is flawed in that it is built around the site having 58 dwellings (Ref P17 Para 5.1.3 - Transport Statement), not the 66 in the proposal. Therefore, it is only indicating 87% of the expected journey.

Simple mathematical extrapolations have been undertaken by the Parish Council as follows:

If the figures produced by the traffic engineers are upscaled to the actual number of dwellings (i.e. increased by 114%) the total number of vehicle journeys predicted for the 08:00 – 10:00 period generated by the site will be 59 (up from 52), with a peak of 34 in one hour (up from 30).

The evening period is busier with the peak being 40 (up from 35) between 17:00 and 18:00, and between 17:00 and 19:00 the development will create 102 vehicle movement (up from 89).

As part of their work the engineers undertook a 2-hour speed survey on Kendal Way, believed to be between 08:00 and 10:00. During this time, they observed 53 vehicles, of which 31 were part of the survey as they were perceived to be 'through' traffic.

At best, using their own figures, this development will, in the morning 08:00 – 10:00 slot, account for a **100% increase** (53 to 113 [53+59] trips) in traffic on Kendal Way, at worst a 300% increase (i.e. 31 compared to 90 [31+59] trips).

If an assumption is made that the current evening peak (17:00 – 19:00) is the same as the morning peak on Kendal Way then the increase in traffic is starker with a 320% increase from approx. 45 to 150 trips

An interesting point to note is that an earlier 1-hour survey, not used in the report, only captures 7 vehicles and it is not clear why, in the 2-hour survey period, a total of 52 vehicles were observed. That is approximately a vehicle every 2 minutes!

With this in mind the proposed development may be increasing local traffic volumes by more than 3 or 4 times.

The traffic engineers mitigate the increase in traffic by indicating that it would be spread across 3 egress road – these being Ingleton Ave, Malham Ave and Legarde Ave.

Using 3 such egress routes would be linked to driver behaviour, as they mainly all produce the same outcome which is to access Anlaby Road. Therefore, drivers would use the different routes based on the benefit they derive from using roads other than Malham Ave. It is impossible to see any benefit in using Ingleton Ave to get to the dual carriageway, in fact it is a longer route and brings the driver out in to traffic behind vehicles using Malham Ave. A slight benefit, at busy times, could be gleaned by using Legarde Avenue but this is negligible as the route is longer, involves navigating a junction and a 90-degree bend so would actually take longer in time to navigate. Therefore, those with local knowledge doubt the validity of this argument and mitigation.

Lastly, the issue of excessive traffic generation hinges on the quotation from the National Planning Policy Framework (NPPF) – “Development should only be prevented or refused on highways grounds if there would be an unacceptable impact or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios”.

The Parish Council believe that a doubling or even tripling of through traffic at peak times from a single development is an ‘unacceptable impact’, it clearly fits the criteria of a residual cumulative impact. Also, the mitigations referenced do not, as explained above, deal with the severity and, due to the location; there are no possible future highway scenarios that could be implemented to improve things due to the density of the built environment.

Therefore, the development would have a ‘substantial’ impact from the increase in traffic, as defined by the NPPF, and this issue should be taken account of as part of the decision-making process.

With this uncertainty over the modelling process and associated increase in traffic on the local network, coupled with the many concerns voiced by many local residents the Parish Council believe that this matter needs further in-depth investigation. The Parish Council would also like to see this work advise as regards any mitigations which could be implemented by either the developers or as part of a local Community Infrastructure Levy schemes.

Community Infrastructure Levy Feedback

The Parish Council note that Community Infrastructure Levy documentation has been submitted as part of this application which would come to fruition if planning is approved.

The Parish Council would welcome involvement in this process, if invoked.

Tentative schemes for consideration could include:

- [ERYC] A one way system for Colville, Faversham and north part of Trenton Ave with associated parking control to assist free flow of traffic.

- [ERYC] Further works to improve the school zone safety at Anlaby Acre Heads School at the Norland Ave, Welbourn Walk junction including building out kerbs at the junction, expanding parking restrictions around the junction and school zone speed limits backed by speed indicator devices.
- [HCC] A speed table installation at the junction of Kendal Way Ingleton/Legarde/Malham Ave to reinforce Give Way priority at the junction.
- [HCC & ERYC] No parking provision around junctions in the wider neighbourhood locally but particularly the south end of Kendal Way at its junction with Malham Ave.
- [HCC] Crossing improvements outside Eastfield Primary School involving a light controlled pedestrian crossing linked to the nearby traffic lights.

In Summary

In summary, and based on the assumption that Hull City Council is looking to approve this site for housing use, the Parish Council request that, before a decision is made, the following are undertaken:

- That the number of houses in the development is reduced considerably due to the flooding and congestion/traffic risk.
- That a further independent second flood risk assessment is undertaken that includes an assessment of the whole neighbourhood, and not just the development site, to appease concerns of local residents.
- That a further independent transport and traffic appraisal is undertaken to assess the impact on the local neighbourhood and the roads servicing this site. This should use accurate metrics around the size of the development, more in-depth surveys of peak and non-peak traffic flows on local roads and recommendations on how the local road network could be improved to minimise the impact of the development.
- Work is completed, as part of this proposal, on the headroom capacities of the two local Primary Schools and, if possible, other local services such as healthcare provision, especially after other recent local developments off Calvert Lane have now been completed.

- END -

