



Your Ref 24/03336/STPLF

Our Ref: JW/01/01

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Beverley Development Management,  
East Riding of Yorkshire Council,  
County Hall,  
Beverley,  
East Riding of Yorkshire,  
HU17 9BA,

Date: 28<sup>th</sup> January 2025

Dear Mr Hunt,

**Application Ref:** 24/03336/STPLF

**Case Officer:** Mr James Chatfield

**Proposal:** Creation of a park and ride with ancillary buildings including canopied waiting areas, welfare building and plant building; a bus depot; a petrol filling station with shop, car wash and EV charging bays; three drive through restaurants; creation of two vehicular accesses off Beverley Road; creation of two vehicular accesses off Raich Carter Way; and erection of an acoustic fence, with ancillary landscaping and infrastructure

**Address:** Land South Of Raich Carter Way Dunswell East Riding Of Yorkshire HU6 7YJ

Thank you for consulting Hull City Council on the above application.

#### Principle of Park and Ride Proposal

The proposed site is allocated in the East Riding Local Plan Allocations document under Policy DUN - A. The policy allocates the site for a Park and Ride facility "including ancillary uses."

Proposals will be required to:

- Retain the substantial hedgerows within and on the periphery of the site as far as possible;

- Provide a substantial landscaped buffer to the southern boundary; and
- Demonstrate through the submission of a Hydrological Risk Assessment that the development will not cause unacceptable adverse harm to the water source.

Hull City Council and East Riding of Yorkshire Council, (through the development of their respective Local Plans), have engaged with each other constructively. This has been formalised through the preparation of a Joint Planning Statement, which has been agreed by the Cabinet of each Council and identifies those cross-boundary strategic priorities that are of relevance for both authorities. This includes the aspiration between Hull and East Riding to create a new park and ride facility to the north of the city on land between the A1079 and A1033 at Dunswell roundabout (the site of the application) to help reduce traffic congestion from the north of the city in the corridor leading into the City Centre.

The provision of a Park & Ride to the north of the city is also included in Hull City Council's Local Transport Plan (LTP) 3 (2020-2026) Paragraph 5.16 and is referred to in the adopted Hull Local Plan November 2017 (paragraph 10.32) which states:

*“The provision of a Park and Ride site to the north of the city is also included in the Council's current LTP. There is an aspiration between Hull and East Riding of Yorkshire Councils to create a new park and ride facility to the north of the city between the A1079 and A1033 at Dunswell Roundabout. This scheme is allocated in the East Riding of Yorkshire Local Plan.”*

The proposal would assist in providing an alternative to the private motor vehicle and places more emphasis on sustainable modes of transport. The principle of a Park and Ride in this location is, therefore supported.

### Ancillary Uses

The supporting justification to Policy DUN - A (paragraph 14.4) clearly states:

*“The Park and Ride may include ancillary uses, such as public conveniences, information points and seating areas.”*

An ancillary use implies that it should be that which is ancillary to the dominant purpose (in this case the Park and Ride) and that there should be some functional relationship with the primary purpose of the planning unit.

It is clear from the proposal that a bus depot, three drive restaurants, petrol station and a shop do not constitute ‘ancillary uses.’ This is a clear departure from the intention of Policy DUN – A.

The proposal site is located outside of a town centre and the development limits of any settlement as defined on the Local Plan Policies Map. As such, Hull City Council has serious concerns relating to the scale of development that is being proposed in this location which is far beyond what is needed for a Park and Ride. Hull City Council objects to the planning application.

The applicant puts forward the argument that the mixed-use development is required to bring forward the delivery of the Park and Ride, however Hull City Council do not consider there is an identified need for such facilities. Within the locality, there are three existing petrol filling stations, two of which have ancillary retail kiosks and there are a number of drive-thru facilities at Kingswood Retail Park.

The supporting Retail Statement (paragraph 3.2.5) states “*A case could be made that the proposals are ancillary to the park and ride facility and so are in accordance with the ERLP and as such there is no need to address the sequential test (or the impact test...)*” However, the Statement goes on to say that to assist the Council both tests have been addressed, which suggests that the applicant is not convinced that the proposed additional elements of the scheme are ‘ancillary’. Hull City Council does not consider them to be ancillary.

The Design and Access Statement states in paragraph 1.0 that the three eateries / drive-thrus have been provided to give opportunities to awaiting bus users and the public to eat and drink. It is not clear how the facilities would be accessed from the park & ride given the physical barrier of the drain, and the only potential access would be via the car route into the site – some distance from the park & ride facility. The need to walk past the bus depot entrance / exit would not promote safe pedestrian access to the drive-thru and in reality these facilities would operate in isolation from the park & ride operation and in no way be ancillary to it.

### Sequential Assessment

The town centre uses (shop within the petrol filling station and drive through restaurants) have been disaggregated from the remainder of the proposal for the purposes of the sequential test. However, it is argued that because they are interdependent and interconnected, physically and functionally, they will not be delivered by the applicant in isolation. As such, the area of search has been based on sites capable of accommodating the proposal which extends to between 970sqm and 1,178sqm gross.

Hull City Council challenges the approach to the Sequential Assessment and why the separate elements cannot be disaggregated. There is no justification for the need for three drive thru facilities and petrol filling station with shop in this location.

### Retail and Leisure Impact Assessment

The applicant considers retail and drive thru impact separately which makes sense given the different approaches to establishing the impact of such uses.

For the shop that forms part of the petrol filling service station paragraph 5.1.3 of the submitted retail statement states “*...the site is allocated for a park and ride with ancillary uses which is the key consideration in respect of this location. The proposal will function like a service station which by their very nature need to be located directly adjacent to the strategic road network. It will not function as a destination in*

*its own right Thus whilst the shop is provided in the petrol filling station it will clearly be ancillary to the role of the service station.*” [our emphasis].

While the applicant determines that the scheme will likely have a minimal impact on convenience outlets located within defined town centres, it is not clear why that justifies a further out of centre store in this location. The store would be ancillary to a service station that would serve passing vehicles as much as vehicles accessing the park & ride so this would itself be creating a new catchment.

Section 5.4 of the Retail Statement refers to ‘Drive Thru Impact’. Paragraph 5.4.1 states:

*“...there are no drive-thru coffee shops/restaurants within Beverley, Cottingham. Kingswood or other nearby centres so there is no direct competition.”*

*“Trade is likely to be drawn from the nearest drive throughs including Wendy’s and Mcdonald’s along Gibraltar Road, so it is likely that trade will be drawn from these facilities, which are located outside existing centres.”*

It is correct that there are no such facilities within the centres as by their nature drive-thru facilities are designed to be easily accessed by passing cars rather than on foot trade as traditional sit in / walk in cafes. However, there are drive-thru facilities close to the Kingswood District centre as acknowledged in paragraph 5.4.3 which could be classed as edge of centre and are within an established retail park where land remains allocated in the Hull Local Plan for employment / leisure / community facilities.

What is made clear by the applicant is that the trade will come from various sources – including from visitors to the proposed petrol filling station, the P&R and from nearby residents. Importantly the applicant makes clear that *“there will also be very significant pass by trade from drivers using Beverley Road and Raich Carter Way”*

This completely undermines the references in the statement to how these outlets are ancillary to the P&R operation. Equally it is not clear why the proposed outlets cannot be disaggregated as they are clearly separate operations, but the applicant is seeking to maximise value from the site by making the most of the opening up of access to the site for other vehicular uses, and a new commercial frontage to Beverley Road.

Hull City Council has significant objections to the need to introduce service station and drive-thru outlets in this location. While quantitative impact on other outlets could be seen to be low the proposal appears to be opportunistic commercial venture on the back of the original intention for this to be a Park & Ride facility, and now the potential for a relocated bus depot. There seems only limited linkage between the drive-thru and service station and other uses, and they can hardly be classed as ancillary to the Park & Ride facility.

### Relocation of Bus Depot

The Planning Statement suggests that the bus depot is complementary to the Park and Ride and will provide maintenance, training, and office facilities for the bus company, consolidating their operations which are currently based in Anlaby Road Hull and in Brough.

It is considered that a greater proportion of the site is proposed to be used for the bus depot, whereas the site is allocated for a Park and Ride facility. This cannot be regarded as ancillary, despite the obvious link between buses and Park and Ride facility. The scale of the proposal would indicate that the bus depot would service buses from across the area, not just those directly using the Park and Ride facility and as such would not be ancillary.

### Park & Ride Operation

The East Riding Local Plan Allocations Document 2016 allocates land for a Park and Ride under BEV – R. The land is also re-allocated in the East Riding Local Plan Update.

Paragraph 3.7 of the Planning Statement states that the bus services 23, 121, X46 and X47 which currently run past the proposed development site would be expected to re-route via the Park and Ride facility. This would also provide the opportunity for visitors to park within the Park and Ride site and travel on the bus to and from Beverley Town Centre.

It is not clear whether the proposal would serve to act as a 'replacement' to the above allocation, given that it is suggested that it could serve people from Hull parking up and getting services in the other direction to Beverley, or even York (X46/X47).

Furthermore, it is not clear how services will operate, whether there is the commitment to provide a fully dedicated park and ride service or will it rely on standard services. This could impact on the efficiency and attraction of the service, for example if this is simply a hub for existing services operating to standard timetables.

The applicant would need to clarify the capacity of existing services to ensure that additional passengers can be accommodated both at the site and along existing routes.

### Flood Risk

As the neighbouring Lead Local Flood Authority response to this planning application, Hull City Council objects on the grounds of a lack of sufficient detail on the surface water drainage of the site. If this is not addressed, it could increase the risk of flooding to both the site and surrounding area as a result.

The submitted Drainage Impact Assessment states a discharge run-off rate for the site of 28.8 l/s but we would argue that it is more likely to be half of this given the clay, compacted soils. The surface water is to be discharged to Beverley and Skidby Drain which flows through the site, but this drain is filled in at the Hull boundary. Records show a riparian ditch runs along the southern boundary of the site and discharges into Beverley and Barmston Drain but this would need further investigation as to the capacity and the outfall. It was unclear what sustainable drainage (SuDs) features the application proposes, the Drainage Impact Assessment mentions underground storage and pumping. For a development such as this Hull City Council would expect to see maximum use of green above ground SuDs which address the 4 pillars; water quantity, water quality, amenity and biodiversity. There could be potentially to provide some of the required Biodiversity Net Gain on site with designs that incorporate appropriate planting.

### Conclusion

Whilst the principle of a Park and Ride facility on the allocated DUN-A site is supported, the City Council has serious concerns in respect of the scale of development proposed and impact on neighbouring residents. There seems to be little justification for the additional commercial service station and driv-thrus being located on the site. Furthermore, the lack of sufficient detail on surface water drainage on the site needs to be addressed. For these reasons Hull City Council objects to the planning application.

**NOTE TO CASE OFFICER:** Should ERYC be minded to approve this planning application, the City Council would request that the case officer contacts officers at the City Council to discuss the implementation of appropriate planning conditions on the decision to ensure that the impact of the scheme on the city can be mitigated and controlled as much as possible

Your sincerely,



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