

FaO Mr Thomas Parker
By email to planning@eastriding.gov.uk

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Date: 26th June, 2026

Dear Mr Parker

Application Ref: 26/00942/STPLF

Case Officer: Mr Thomas Parker

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; two 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 on the 4th June, 2026. This is a very similar application to the previous proposal on this site (24/03336/STPLF), to which Hull City Council objected, that application was subsequently withdrawn. This current proposal, due to the very limited changes raises many of the same issues which I will address below.

It would appear that the main differences between 24/03336/STPLF and 26/00942/STPLF are: -

- 1) The reduction to 1 drive thru restaurant compared to 2. With that part of the site being used for more parking to serve the proposed single drive thru.
- 2) Changes to the parking area to the south east boundary to include a separate area for EV vehicle charging, 20 disabled car parking spaces, relocated welfare/WC facilities and relocated canopied waiting/cycle storage.
- 3) Alterations to the vehicle entrances off Raich Carter Way.
- 4) Removal of the bus only lane on the South East side of the site.



Planning Development Control, Hull City Council,
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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, two 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 still 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 i(paragraph 3.2.7) 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, in order to assist the Council, both tests have been addressed.”* Hull City Council does not consider these facilities to be ancillary and therefore they need to be considered on their own merits.

The Design and Access Statement states in paragraph 1.0 that the three eateries / drive-thru’s 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, it would appear that pedestrian customers would have to leave the site and access those facilities from Beverley Road, since there are no direct dedicated pedestrian links within the site to the drive thru’s/petrol filling station. Clearly this would not promote ancillary use but independent use.

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 and the role it is intended to serve."* [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." This is incorrect, there are drive thru facilities in Beverley, approximately 5.8m to the north.

"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." This is incorrect, there are drive thru facilities in Beverley, approximately 5.8m to the north, trade could be drawn from this unit.

Also, there are drive- thru facilities close to the Kingswood District centre as acknowledged in paragraph 5.4.5 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.

The very large part 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.

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.

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, in order for the site to function effectively as a park and ride facility..

Highways

To our knowledge the application has not been subject to pre-application discussions with Hull City Council Highways Officers. I have requested comments from Hull City Council Highways and will forward them separately when/if received.

Flood Risk

The current application has been considered in this regard and as the neighbouring Lead Local Flood Authority, Hull City Council maintains its objection 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.

Noise Impact, Lighting Impact, Air Quality, Odour

Hull City Council Environmental Regulation officers have reviewed the submitted documentation including the Noise Impact Assessment, Lighting Impact Assessment, Air Quality Assessment, Odour Assessment and supporting technical information.

Whilst the site has been identified and safeguarded for a Park & Ride facility for a considerable period of time, the current proposal extends beyond a traditional Park & Ride facility and, notwithstanding the reductions made since the previously withdrawn scheme, incorporates a range of additional uses including a bus depot, bus maintenance facilities, petrol filling station, drive-through restaurant uses, commercial units and associated infrastructure.

It is important that the combination of uses proposed can be demonstrated to operate without causing unreasonable adverse impacts upon nearby residential occupiers within Hull and other sensitive receptors in the locality, and although a number of amendments have been made since the previous withdrawn application, concerns remain regarding the potential impact of the development upon nearby residential receptors within Hull, particularly in relation to noise.

The submitted Noise Impact Assessment relies upon baseline noise measurements undertaken in September 2024 and predicts BS4142 rating levels at nearby residential receptors of up to 55 dB during the daytime, 50 dB during the evening and 45 dB during the night-time period. These levels represent exceedances above measured background noise levels of 9 dB, 6 dB and 16 dB respectively. The assessment itself concludes that the BS4142 assessment indicates an adverse impact during the daytime and evening periods, increasing to a significant adverse impact during the night-time scenario prior to the consideration of contextual factors and mitigation.

Hull City Council Environmental Regulation notes that the assessment includes a proposed 3 metre acoustic barrier along the southern site boundary within the noise model and therefore the predicted receptor levels already include the benefit of this mitigation measure. Notwithstanding this, the assessment continues to predict a night-time rating level significantly above the measured background noise level.

The residential properties within Hull comprise predominantly two-storey dwellings with a substantial number of first-floor bedroom windows overlooking the development site. Whilst the proposed acoustic barrier may provide screening to gardens and ground floor windows, it is unclear from the submitted assessment whether the effectiveness of the barrier has been specifically evaluated in relation to upper-floor residential receptors which may retain direct line of sight to operational areas of the development, including the proposed bus depot and associated activities. Given the separation distance between the proposed barrier and the nearest dwellings, together with the elevated position of many first-floor windows, Hull City Council Environmental Regulation considers that further clarification is required regarding the level of attenuation achieved at upper-floor receptor locations.

Hull City Council Environmental Regulation also notes that the assessment relies upon a number of assumptions regarding future operational activity, including vehicle movements, depot operation, maintenance activities and commercial uses, however there are inconsistencies in the documents submitted relating to the operational hours of the bus depot. The travel plan identifies a revised operational time of 04:00-02:00, but the staff shifts detailed include the full 24 hour period. The revised Noise Impact Assessment also still refers to the depot use as 24/7. Given the scale and variety of uses proposed, including the bus depot, maintenance facilities, park and ride operations, drive-through restaurants, petrol filling station and associated commercial uses, it is unclear whether the assumptions adopted represent a realistic worst-case operating scenario, regardless of the potential 2 hour pause in bus depot operational activities.

In addition, clarification is sought regarding whether the BS4142 assessment has fully considered the acoustic characteristics associated with the proposed uses, including intermittent vehicle movements, reversing alarms, vehicle manoeuvring, maintenance activities and other potentially impulsive or intermittent noise sources associated with the operation of the development.

Hull City Council Environmental Regulation also notes that it is not entirely clear from the submitted drawings whether the revised layout prevents direct vehicle movements between Raich Carter Way and Beverley Road via the internal site road network. Clarification is therefore sought regarding the proposed access and egress arrangements and whether the development could facilitate through-traffic movements that bypass Dunswell Roundabout.

This matter is relevant not only from a highways perspective but also to the Environmental Regulation assessment of the proposal. Should direct through-movements be possible, particularly outside normal Park & Ride operating hours, there is potential for additional traffic activity in close proximity to nearby residential receptors. Such movements could influence both traffic-related noise levels and emissions of NOx and particulate matter and may therefore affect the assumptions upon which the submitted Noise Impact Assessment and Air Quality Assessment are based. Until the access arrangements are fully understood, Hull City Council Environmental Regulation is unable to determine whether the submitted assessments adequately represent the likely operational impacts of the development.

Hull City Council Environmental Regulation notes that the submitted lighting assessment indicates compliance with the relevant ILP criteria and does not raise any significant concerns regarding light intrusion at nearby residential receptors. Similarly, no significant concerns are raised in relation to the submitted odour or contaminated land assessments at this stage.

Hull City Council Environmental Regulation would therefore welcome further clarification regarding:

- the receptor locations assessed within the noise model, including whether first-floor residential windows have been specifically assessed;
- the level of attenuation attributed to the proposed acoustic barrier at upper-floor receptor locations;
- the clarification of operational hours of all activities proposed on the site and the operational assumptions adopted within the assessment and how these represent a realistic worst-case scenario;
- the treatment of intermittent, impulsive or other distinctive acoustic characteristics within the BS4142 assessment; and
- the proposed site access arrangements and whether direct vehicle movements between Raich Carter Way and Beverley Road are prevented.

Based upon the submitted information, Hull City Council remain concerned regarding the conclusions of the Noise Impact Assessment and the assumptions underpinning both the noise and air quality assessments and is therefore unable to support the proposal in its current form until the above matters have been satisfactorily addressed and it has been demonstrated that the development can operate without causing unreasonable adverse impacts to nearby residential amenity and other sensitive receptors.

Conclusion

Whilst the principle of a Park and Ride facility on the allocated DUN-A site is supported, and the revised proposal does offer some improvements over the previously withdrawn scheme, the City Council still has serious concerns in respect of the scale of development proposed and impact on neighbouring residents. The proposed scope of the 'ancillary' facilities (bus depot, 2 drive thru facilities and petrol filling station and shop) clearly falls outside the scope of the allocation. Ancillary facilities are to be expected in such a site and are envisaged by the allocation, however in this proposal there is little planning justification for the scale and range of the additional commercial facilities. Furthermore, the lack of sufficient detail on surface water drainage on the site needs to be addressed as does the issues identified above relating to noise and air quality impacts to the neighbouring residential properties. 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,

A handwritten signature in black ink, appearing to read 'D. Jones', with a stylized flourish at the end.

Dylan Jones
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