

**FULL SUTTON & SKIRPENBECK
PARISH COUNCIL**

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Your Ref: 17/01494/STOUT
Case Officer: Mrs Susan Hunt

Head of Planning & Development Management
East Riding of Yorkshire Council
County Hall
Beverley
HU17 9BA

14th June 2017

Dear Susan

Land to The West of HM Prison Full Sutton Moor Lane Full Sutton - Erection of prison complex with associated perimeter fencing, access, parking, landscaping and infrastructure (access and scale to be considered)

I am writing to make you aware of the strong objections that the Parish Council and the wider community have with regard to the above proposal.

The planning application wishes to develop a major prison complex on a greenfield site, on the edge of an existing prison, in an unsustainable and predominantly rural location.

It will result in a significant and unacceptable increase in the scale of the existing facility in terms of prisoners, employees, transport movements, physical infrastructure, physical footprint and visual impact.

Further, it would cause significant harm to the character, appearance, amenity, biodiversity, heritage and infrastructure (especially roads and public sewerage system) of the surrounding area. It does not accord with national and local planning policies. Nor does it represent sustainable development.

It is simply not a suitable or a sustainable location for this type of development.

For these and other important reasons it should be refused.

Turning to the main reasons why we consider it should be refused in more detail.

Focusing Development to the most Suitable and Sustainable Locations

One of the main objectives of national and local planning policy is to focus development to the most sustainable and suitable locations. As para. 6 of the National Planning Policy Framework States, *“The purpose of the planning system is to contribute to the achievement of sustainable development”*.

The development of this site cannot be considered as supporting sustainable development.

It involves the development of greenfield site in a rural location some distance away from the main settlements.

In particular, it is contrary to established local and national transport objectives. It is in a remote location, which does not have satisfactory links to the main population centres by walking, cycling, public transport or other sustainable transport modes as required by national and local planning policy.

Public transport provision to the site is, at best, extremely limited. The nearest train station is York, which is approximately 18 km from the site. There is an infrequent bus service. The existing bus service (747) which serves the existing prison runs from York to Pocklington at a frequency of approximately 4 times a day in each direction from Monday to Saturday not tying in with shift patterns or visiting times. There is no bus service on a Sunday or in the evening serving the site.

While it is appreciated that some other journeys will be made by foot and bicycle; even so, it is clear that the prison would be heavily reliant on vehicular transport; an approach that is reflected in the number of proposed car parking spaces and the findings of the Transport Assessment accompanying the planning application, which states, *“This report has demonstrated that the majority of trips, both visitors and staff, would be taken by vehicle”*.

It would not be in a location which offers sustainable choice as to a mode of travel. This is contrary to national and location planning policies, as the following statements underline:

“Plans and decisions should ensure developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised” (Para 34 of the National Planning Policy Framework).

“Direct most new development to areas where there are services, facilities, homes and jobs, which reduces the need to travel and where it can be served by sustainable modes of transport” (East Riding Local Plan).

While it is recognised that some aspects of the proposal such as job creation would contribute to sustainable development, the adverse impacts on sustainable development would significantly outweigh any benefits. In the round, therefore, it does not represent a sustainable form of development.

Impact of Road Network and Transport Issues

The site is located off Moor Lane, Full Sutton.

A Transport Assessment (TA) has been submitted in support of the application. This examines the traffic generation and associated impact of the proposal. This suggests that, *“The site is well located for the proposed land use, with good links to the local and strategic highway network. The forecast prison trips will not result in a detrimental impact on the local highway network. It is concluded that the proposed prison site can accommodate the proposed development of a new 1,017 inmate prison in transport terms”*. We strongly refute this finding.

As previously acknowledged, the overwhelming journeys to the prison will be by vehicle. The road network in the surrounding area has developed over many years, and it is not designed for, nor suited to, modern vehicular movements. At the same time, a significant and growing amount of vehicular traffic passes through the Parish and the surrounding area. Therefore, many of the roads are already congested.

The main access to the area is via the A166. It is not uncommon for eastbound traffic along this road to be stationary for at least two miles particularly at peak times in summer (the A166 is a major coastal access road), and for westbound traffic to be queuing back for a mile.

Further, there is only a single track, traffic-light controlled bridge over the river, which is already a bottleneck.

Planned major housing and other developments in the nearby areas such as at Stamford Bridge will only serve to put the road system under greater pressure. The introduction of significant further transport movements associated with the development, even taking into account the planned improvements, would simply mean that the roads would not be able to cope. It would result in severe and unacceptable harm to an already congested local road network. This is supported by the Planning Inspector’s comments on further development in Stamford Bridge that it is unlikely that any further development can take place without an increase in capacity at the single track traffic light controlled bridge.

Further, we have serious concerns regarding the methodology undertaken in respect of the Transport Assessment accompanying the planning application. We believe that it is flawed and, as a result, many of the assertions it makes are insufficient and unsatisfactory. We are especially concerned that the traffic survey appears to be

undertaken in November. This means that it takes no account of the peak summer traffic flows through the Parish.

Impact on Public Sewerage System

There is insufficient capacity in the public sewerage system to accommodate the demand that would be generated by the development. We understand that Yorkshire Water in its response to the consultation stated that it is not acceptable for this reason. This is a view we fully share and endorse.

Impact on the Character and Appearance on the Surrounding Area

The site is in a prominent and visible location in an area that is it predominately rural in character.

While the scale, massing and design of the development is similar to that of the adjacent prison, it is significantly different to that which currently exists on the site and the surrounding area. The development of this green field site would represent a significant and unacceptable change.

The proposal by its nature will be a relatively large and imposing development. Many of the buildings are proposed to be four storeys (16m, 55ft) in height, and it will incorporate significant security fencing and security lighting, for example. The existing prison was approved to be a maximum of 2 storeys high.

While it is recognised that consideration has been given to its appearance, including measures such as screening, still it cannot be described as in keeping with the character of the surrounding area. It will have an institutionalised appearance that will dominate the landscape for many miles around.

Indeed, its prominent, substantial and fortress like appearance would mean that it would cause significant material harm to the character, appearance and openness of the surrounding area.

This is contrary to established planning policies. These include Policy ENV2 of the East Riding Local Plan, which requires that, "Development proposals should be sensitively integrated into the existing landscape, demonstrate an understanding of the intrinsic qualities of the landscape setting and, where possible, seek to make the most of the opportunities to protect and enhance landscape characteristics and features. A Policy which the proposal is clearly not in accordance with.

Impact on the Amenity of Nearby Residential Properties

The proposal by its nature will be a relatively large and imposing development. Its height, mass and fortress like appearance will dominate the local area. Many of the buildings will be four storeys (16m, 55ft) in height. It will be lit from lighting columns of up to 5 m high.

The proposal would have a significant and unreasonable harmful impact on the amenities of the occupants of neighbouring residential properties. This is not only in terms of light spillage and light glare, but also noise disturbance and overlooking.

Impact on Amenities

We are concerned about the impact the increased number of prisoners, employees and visitors will have on community facilities such as health and policing. These are already under strain in the local area, and the development would serve to make this situation worse. In addition we have had the facility of a community centre withdrawn from use and closed down in 2001 at a stroke the MoJ. National and local policies create a strong presumption against development that would have a harmful impact on community facilities.

This is illustrated by Policy C1 (Providing infrastructure and facilities), of the East Riding Local Plan which states, "A. Proposals for new and/or improved infrastructure and facilities will be supported where they enhance the quality and range of services and facilities. B. New development will be supported where it is adequately serviced by infrastructure and facilities. Where necessary, the phasing of new development will be linked to the delivery of new or improved infrastructure and facilities".

Impact on Biodiversity and Heritage

The site supports, and is located close to, several features of heritage and biodiversity importance. These include important habitats such as grasslands, which we understand support examples of rare and nationally important wildlife. Further, we understand that it is likely that the site may contain heritage assets dating from the prehistoric and Romano-British periods. It established national and planning policies that development proposals which would adversely affect important wildlife and heritage sites should only be allowed in special circumstances. Special circumstances that are not considered to be relevant here.

Other Development Options and Development in the Countryside

The applicant also does not demonstrate why this development could not be accommodated elsewhere in Yorkshire and the wider area. In addition, why it requires a greenfield site in the countryside. We consider that there are other available sites,

which are more suitable and sustainable. It is, therefore, contrary to national and local planning policies, including those which seek to protect the open countryside and greenfield sites from inappropriate development. This includes Policies S3 (Focusing Development) and S4 (Supporting development in Villages and the Countryside) in the East Riding Local Plan.

Public Consultation

We are very concerned about the community consultation undertaken. The efforts to engage and communicate with the community to gauge their views and opinions on the development have been inadequate. A good example, is the public engagement event. This was poorly advertised in the local and wider community, meaning that many residents were not aware that it was taking place. The inadequacy of the consultation process means that the views and opinions of the community are not being adequately considered and represented.

Cumulative Impact

In summary the development is too big, in the wrong location for the category of prison and the effect is an abuse of the community.

For these and other compelling reasons we would strongly urge that the application be refused.

The Parish Council feel that if permission was to be granted, ground should not be broken on this project until all outstanding issues have been addressed by the MOJ.

Yours faithfully

Claire Miles-Findlay