
Planning Statement

Application for the Approval of Reserved Matters (Layout, Landscaping and External Appearance) relating to the development of a New Prison pursuant to Outline Planning Permission 18/041105/STOUT

Land adjacent to HMP Full Sutton, Yorkshire

July 2021

Contents

1.	Introduction and Background	1
2.	The Outline Planning Consent (18/04105/STOUT)	8
3.	Site Layout and Design Principles	11
4.	Detailed Layout Proposals	16
5.	The External Appearance of Buildings.....	19
6.	The Landscaping Proposals	21
7.	Community Consultation	27

Appendices

Appendix 1	Indicative Layout Plan from 18/04105/STOUT (Ref: 664015-1275-MAC-ZZ-XX-DR-A-0001)
Appendix 2	Figure 6.1 - Landscape Strategy Drawing (2018)
Appendix 3	Figure 6.1 - Landscape Strategy Drawing (June 2021)

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For and on behalf of Avison Young (UK) Limited

1. Introduction and Background

1.1 Avison Young is instructed by the Ministry of Justice ('MoJ') in respect of a site adjacent to the existing HMP Full Sutton at Moor Lane, Full Sutton, in the East Riding of Yorkshire. We are appointed to submit an application for the approval of Reserved Matters pursuant to outline planning permission 18/04105/STOUT which was granted to the Ministry of Justice ('MoJ') by East Riding of Yorkshire Council (ERYC) in September 2019. The description of development for the outline planning application (OPA) was as follows,

"Outline planning application for the construction of a prison (59,500 sqm GEA) within a secure perimeter fence together with access, temporary access, parking, landscaping and associated engineering works (outline application with access and scale being considered

1.2 The means of access to the proposed prison, and the scale of the development that was proposed, were submitted for consideration at the outline planning application stage and were approved.

- The approved means of access is via a new spur to be taken from the existing HMP Full Sutton estate road, with no requirement for a new access from Moor Lane.
- The maximum amount of development that is permitted by the outline planning consent is 59,500 sqm Gross External Area (GEA)

1.3 The outline planning permission did not consider or approve:

- the detailed layout of the site;
- the external appearance of the buildings; or
- hard and soft landscaping works

1.4 These three detailed matters were 'reserved' for later approval, although the MoJ provided indicative plans and drawings with the OPA which showed how the MoJ expected the new prison to be delivered. Before the new prison can be built, the MoJ needs to provide the LPA with its formal and detailed proposals for these 'reserved matters', and it is these detailed proposals that this Planning Statement describes.

The Site and its Surroundings

1.5 The extent of the application site is shown on the Site Location Plan that accompanies this submission. The site is wholly within the ownership of the MoJ and is part of a larger MoJ landholding, the extent of which is edged blue on the application plans.

1.6 The site mainly comprises agricultural fields, and also areas of woodland, wetland and other vegetation. It is currently bisected by a drainage ditch which runs on an east to west alignment between a balancing pond on the eastern side of the site and a culvert that passes beneath the public highway on Moor Lane. The wider MoJ landholding includes HMP Full Sutton, which provides the highest level of security in the MoJ's custodial estate. HMP Full Sutton is accessed via a simple priority junction off Moor Lane. It does not include any buildings over two storeys high, is well screened, and is enclosed by a secure perimeter wall.

1.7 The application site lies on the edge of the village of Full Sutton. The village has two distinct parts. The eastern part is older and is built around The Green. The western part comprises a housing estate built for prison officers, to the south of which lies HMP Full Sutton. The principal route to the village from the strategic highway network is from the A166 York/Driffild Road via an un-

named highway. The principal route through the village from the west is Moor Lane, from which access to HMP Full Sutton is taken, and which turns into Hatkill Lane in the east.

Background to the Reserved Matters Application

- 1.8 The 2015 Spending Review and Autumn Statement included measures related to the Custodial Estate. Government announced that it was making available £1.3 billion over the following five-year period with the clear aim of transforming the prison estate to better support rehabilitation and reduce reoffending rates.
- 1.9 Official press releases confirmed that the investment would be used to modernise the prison estate to make it *“even more efficient, safer and focused on supporting prisoner rehabilitation”*. This would be achieved in part by building new, modern prisons containing better education facilities and other rehabilitative services. This process was named the Prison Estate Transformation Programme.
- 1.10 On 3 November 2016, the then Lord Chancellor and Secretary of State for Justice, Elizabeth Truss, delivered a statement to the House on prison reform. The statement explained government’s proposals for investment in the delivery of *“a modern, fit-for purpose estate”*. The Secretary of State confirmed that government would, in that year, *“begin the process of submitting planning applications for new sites starting with Wellingborough and Glen Parva”*. Later, on 22 March 2017, the Secretary of State issued a Written Statement which said that:-

“Today I can confirm that I will launch planning applications for a further four potential sites for prisons to be built in either England and Wales: one new site in Yorkshire adjacent to HMP Full Sutton...”

- 1.11 Shortly afterwards, on 24 April 2017, the MoJ submitted an outline planning application for development at Full Sutton (**DC/17/01494/STOUT**) (‘the 2017 OPA’). The application sought permission for:

“The construction of a prison (38,217 sqm GEA) within a secure perimeter fence together with access, temporary access, parking, landscaping and associated engineering works (outline application with access and scale being considered”.

- 1.12 The prison was expected to accommodate 1,017 Category C adult male prisoners and the indicative layout plan and other material submitted with the outline planning application showed how buildings might be arranged across the site, and included four accommodation blocks (or ‘houseblocks’). The planning application was considered and approved by Planning Committee at ERYC on 20 July 2017. The means of access to the proposed prison and the scale of development (i.e. its maximum gross floorspace) were submitted for approval at the outline planning application stage.
- 1.13 Later in 2018, the MoJ reviewed the level and distribution of strategic need for new Adult Male Category C provision and concluded that the capacity of the new prison at Full Sutton should increase from 1,017 to 1,440. This would require an increase in the number of houseblocks to six, and various other changes to the buildings that would make up the prison. As a consequence, the floorspace permitted by DC/17/01494/STOUT was not sufficient to support the new capacity. To address this the MoJ prepared and submitted a second application on the same site (**18/04105/STOUT**) which we refer to as ‘the 2018 OPA’.
- 1.14 The 2018 OPA was also made in outline and with the MoJ again seeking approval of means of access and the amount of floorspace required to support the delivery of the larger prison. As with the first application, the detailed layout of the development, its external appearance, and the detail of all landscaping works were reserved for later approval by the LPA, but the application was supported by an indicative ‘Site Layout Plan’ (664015-1275-MAC-ZZ-XX-DR-A-0001) and indicative building designs to show how the development could be accommodated on the site, and to support the preparation of assessments of its potential impacts on various environmental, technical and amenity based considerations.

- 1.15 There was a focus on the potential for the increase in the amount of development to have additional impacts on the operation of the local highway network in Full Sutton and Stamford Bridge in particular, and on the related issues of site access, parking provision and public transport accessibility. These matters were very carefully considered and consultants were appointed by ERYC (Pell Frischmann) to review the Transport Assessment and Travel Plan prepared by Atkins in support of the OPA. The Local Planning Authority concluded that the development would be acceptable in all these respects, and those matters do not fall for further consideration as part of this reserved matters application.
- 1.16 There was also a focus on the additional impact of the larger development that was proposed on landscape and visual considerations, and on the strategy for new planting and landscaping to mitigate its effects. These matters were tested through the preparation of a Landscape and Visual Impact Assessment (LVIA) prepared in support of the OPA which considered impacts in the construction and operational phases of the development. The LVIA assumed the incorporation of landscape planting zones around the north-western, western and southern boundaries of the site, and that the development would be laid out as shown on the indicative Site Layout Plan and with the buildings that would make up the prison being within the maximum height parameters suggested in the OPA. Based on these assumptions the LVIA concluded that impacts would be acceptable.
- 1.17 These matters have been reviewed and an updated LVIA (June 2021) has been prepared to support the reserved matters application. The updated LVIA repeats the previous assessment but based on the updated layout and landscaping proposals. The June 2021 LVIA reaches similar conclusions to that submitted with the OPA.

Maximum Development Parameters

- 1.18 When it granted outline planning permission ERYC added 29 planning conditions to the decision notice. Some require the submission of further detailed material in relation to specific aspects of the development, and others control certain aspects of the development to control its impact on amenity and other considerations. Condition 4 was added to control the scope of the outline permission by setting maximum heights for each of the buildings, consistent with the dimensions shown on the indicative material submitted with the OPA. As originally drafted, Condition 4 read as follows.

“The gross external floor area of the buildings shall be limited to 59,500 square metres, and the maximum building parameters for each building limited as set out below as follows.”

- 1.19 The condition then contained a table, which is reproduced below.

Building No.	Indicative Building Parameters			
	GEA (sq. m)	Number	Total GEA (sq. m)	Height (excl plant)
01	4,007	1	4,007	10.2
02	3,126	1	3,126	10.4
03	4,942	1	4,942	13
04	765	1	765	8.7
05	2,345	1	2,345	9.8
06	819	1	819	8.8
07	2,829	1	2,829	12.5
08	348	1	348	7.4
09	642	1	642	5.4
10	6,305	6	6,305	14
11	762	1	762	5.2
12	1,004	1	1,004	8.6
TOTAL		17		

1.20 The wording of Condition 4 created some uncertainty about the way in which it was to be applied, with the effect being that it may have been implied that it controlled matters that it was not intended to, such as the number of buildings that were to be shown on any detailed layouts that accompanied subsequent reserved matters submissions. Consequently in November 2020 the MoJ submitted an application under S.96A of the Town & Country Planning Act (199020/40173/NONMAT) to clarify the wording of Condition 4, so that its intent and application were more clearly defined. The application was approved on 7 January 2021 and the decision notice confirmed that Condition 4 was amended so as to be clear that it does not prevent the submission of reserved matters applications which include fewer than the 17 buildings which it was thought at the OPA stage would be required to deliver the new prison. It confirmed also that:

“if the reserved matters applications propose fewer than 17 buildings, there is no constraint on the total GEA of any combined building, provided that the total overall GEA of all buildings remains with the permitted maximum of 59,500 sqm”.

Development of the Detailed Prison Scheme and Concurrent applications (i) for Full Planning Permission (Workshop Building) and (ii) under s.96A (CASU)

1.21 Towards the end of 2020 the MoJ appointed Pick Everard, via the Perfect Circle joint venture, to provide design and technical advice in support of the development of the detailed proposals for each of the buildings that will form the new prison. Using those building designs, Pick Everard has also developed the detailed layout for the new prison. This has resulted in a scheme that comprises of 12 buildings, rather than the 17 that were shown on the indicative drawings submitted with the 2018 OPA. The reduction in the number of buildings has been achieved through a review of the way in which the uses of buildings were organised, and the consolidation of uses into combined buildings. It remains the case, though, that the prison is designed to accommodate Category C adult male prisoners, in accordance with the information stated in the 2018 OPA.

1.22 Although uses have been consolidated into fewer buildings, it remains the case that the GEA of the prison is within the maximum permitted by the 2018 OPA (59,500 sqm).

1.23 It also remains the case that most of the buildings are within the maximum height parameters stipulated in Condition 4 of the 2018 OPA (as amended). However, two are not, as described below.

- **The Workshop Building:** The indicative material submitted with the 2018 OPA showed two workshop buildings. These were referred to as Building 01 and Building 02 on the indicative plans and in the table in Condition 4. Condition 4 refers to a maximum height parameter of 10.2m for Building 01 and 10.4m for Building 02. The MoJ’s review of the organisation of uses concluded that the workshop activities could be most efficiently combined into a single building, which is now referred to as Building 5011. The height of Building 5011 is 11.89m to ridge. This is 1.49m taller than the maximum height assumed for the taller of the two workshops in the 2018 OPA material, and which is written into Condition 4. Because this falls outside the maximum height parameter set out in Condition 4, the workshop cannot be promoted via the reserved matters process. Instead the MoJ has submitted concurrently with this application a separate application for full planning permission for the workshop building. It is for this reason that the workshop building is ‘greyed out’ on the Site Layout Plan.
- **The Care and Segregation Unit (CASU):** The Site Layout Plan indicates the footprint of the CASU but is annotated to advise that the details of the CASU will follow. This is because the height of the CASU also exceeds, marginally, that allowed for in Condition 4. The exceedance is only in relation to part of the building (the stair well) and is confined to only part of its roof area. Despite it being only marginally outside the maximum parameters the CASU cannot be promoted via the reserved matters application. To resolve this the MoJ has submitted an application under s.96A seeking a ‘non-material amendment’ to Condition 4 which would increase the maximum permitted height of the CASU building from 5.2m to 5.96m. The MoJ considers that the non-material amendment route is appropriate in the case of the CASU because:

- the building exceeds the maximum permitted height by only 0.76m,
- that exceedance is in relation to only a small area of the roof (the stair riser),
- the CASU is the smallest and shortest building proposed on the site' and
- it is located away from the more sensitive western boundary, and adjacent to the tallest buildings on the site (i.e. the houseblocks).

Should the LPA grant the s.96A application (which is subject to a 28-day determination period), the MoJ would at that point substitute the Site Layout Plan with one that includes the CASU and would submit detailed building plans and elevations.

Submission Documents

1.24 The principal purpose of this Planning Statement is to explain the detailed proposals and how they relate to the outline planning consent. In addition to this Statement, the application is accompanied by the following documents.

- Completed and signed Application Forms
- Design Statement prepared by Pick Everard
- Statement of Community Involvement prepared by Avison Young
- Landscape and Visual Impact Assessment prepared by Ramboll
- Proposed SuDS Report prepared by Pick Everard
- Proposed Surface Water Drainage Report prepared by Pick Everard
- Proposed Foul Water Drainage Report prepared by Pick Everard
- Various drawings and schedules prepared by Pick Everard as follows.

Building Name (where applicable)	Document Name	Document Number	Rev
Formal Plans for Approval			
Entrance Resource Hub	Plan-Planning-L00(Ground)	664015-1275-PEV-FNC1011-00-DR-A-9000	P02
	Plan-Planning-LR2(Roof)	664015-1275-PEV-FNC1011-R2-DR-A-9003	P02
	Elevations-Ext-Planning-No Colour	664015-1275-PEV-FNC1011-ZZ-DR-A-9011	P04
Support Building	Plan-Planning-L00(Ground)	664015-1275-PEV-FNC2021-00-DR-A-9000	P02
	Plan-Planning-LR1(Roof)	664015-1275-PEV-FNC2021-R1-DR-A-9002	P01
	Elevations-Ext-Planning-No Colour	664015-1275-PEV-FNC2021-ZZ-DR-A-9011	P03
Central Services	Plan-Planning-L00(Ground)	664015-1275-PEV-FNC3011-00-DR-A-9000	P02
	Plan-Planning-LR1(Roof)	664015-1275-PEV-FNC3011-R1-DR-A-9003	P01
	Elevations-Ext-Planning-No Colour	664015-1275-PEV-FNC3011-ZZ-DR-A-9011	P02
Kitchen	Plan-Planning-L00(Ground)	664015-1275-PEV-FNC4011-00-DR-A-9000	P02
	Plan-Planning-LR1(Roof)	664015-1275-PEV-FNC4011-R1-DR-A-9003	P02
	Elevations-Ext-Planning-No Colour	664015-1275-PEV-FNC4011-ZZ-DR-A-9011	P02
Houseblock	Plan-Planning-L00(Ground)	664015-1275-PEV-FNC7021-00-DR-A-9000	P01
	Plan-Planning-LR3(Roof Plan)	664015-1275-PEV-FNC7021-R3-DR-A-9004	P02
	Elevations-Ext-Planning-No Colour	664015-1275-PEV-FNC7021-ZZ-DR-A-9011	P04
	Site-Location Plan-Existing-PLANNING	664015-1275-PEV-FNC0011-ZZ-DR-A-9101	P05
	Site-Block Plan-Proposed-PLANNING	664015-1275-PEV-FNC0011-ZZ-DR-A-9200	P05
	Landscape Strategy Plan	664015-1275-PEV-FNC0011-XX-DR-L-0302	P07
	Hard and Soft Landscape Proposals Sheet 01-Stage 03	664015-1275-PEV-FNC0011-XX-DR-L-0401	P04

	Hard and Soft Landscape Proposals Sheet 02-Stage 03	664015-1275-PEV-FNC0011-XX-DR-L-0402	P04
	Hard and Soft Landscape Proposals Sheet 03-Stage 03	664015-1275-PEV-FNC0011-XX-DR-L-0403	P04
	Hard and Soft Landscape Proposals Sheet 04-Stage 03	664015-1275-PEV-FNC0011-XX-DR-L-0404	P04
	Landscape Schedule of Hard Landscape Components_Stage 03	664015-1275-PEV-FNC0011-XX-SH-L-1602	P04
	Landscape Schedule of Soft Landscape Components_Stage 03	664015-1275-PEV-FNC0011-XX-SH-L-1603	P05
	Impermeable Areas Plan	664015-1275-PEV-FNC0011-ZZ-DR-C-0103	P02
	Proposed Surface Water Drainage	664015-1275-PEV-FNC0011-ZZ-DR-C-0500	P02
	Proposed Surface Water Drainage-Sheet 01	664015-1275-PEV-FNC0011-ZZ-DR-C-0501	P02
	Proposed Surface Water Drainage-Sheet 02	664015-1275-PEV-FNC0011-ZZ-DR-C-0502	P02
	Proposed Surface Water Drainage-Sheet 03	664015-1275-PEV-FNC0011-ZZ-DR-C-0503	P02
	Proposed Surface Water Drainage-Sheet 04	664015-1275-PEV-FNC0011-ZZ-DR-C-0504	P02
	Proposed Surface Water Drainage-Sheet 05	664015-1275-PEV-FNC0011-ZZ-DR-C-0505	P02
	Proposed Surface Water Drainage-Sheet 06	664015-1275-PEV-FNC0011-ZZ-DR-C-0506	P02
	Proposed Surface Water Drainage-Sheet 07	664015-1275-PEV-FNC0011-ZZ-DR-C-0507	P02
	Proposed Surface Water Drainage-Sheet 08	664015-1275-PEV-FNC0011-ZZ-DR-C-0508	P02
	Proposed Surface Water Drainage-Sheet 09	664015-1275-PEV-FNC0011-ZZ-DR-C-0509	P02
	Proposed Surface Water Drainage-Sheet 10	664015-1275-PEV-FNC0011-ZZ-DR-C-0510	P02
	Proposed Surface Water Drainage-Sheet 11	664015-1275-PEV-FNC0011-ZZ-DR-C-0512	P02
	Proposed Foul Water Drainage	664015-1275-PEV-FNC0011-ZZ-DR-C-0550	P02
	Proposed Foul Water Drainage-Sheet 01	664015-1275-PEV-FNC0011-ZZ-DR-C-0551	P02
	Proposed Foul Water Drainage-Sheet 02	664015-1275-PEV-FNC0011-ZZ-DR-C-0552	P02
	Proposed Foul Water Drainage-Sheet 03	664015-1275-PEV-FNC0011-ZZ-DR-C-0553	P02
	Proposed Foul Water Drainage-Sheet 04	664015-1275-PEV-FNC0011-ZZ-DR-C-0554	P02
	Proposed Foul Water Drainage-Sheet 05	664015-1275-PEV-FNC0011-ZZ-DR-C-0555	P02
	Proposed Foul Water Drainage-Sheet 06	664015-1275-PEV-FNC0011-ZZ-DR-C-0556	P02
	Proposed Foul Water Drainage-Sheet 07	664015-1275-PEV-FNC0011-ZZ-DR-C-0557	P02
	Proposed Foul Water Drainage-Sheet 08	664015-1275-PEV-FNC0011-ZZ-DR-C-0558	P02
	Proposed Foul Water Drainage-Sheet 09	664015-1275-PEV-FNC0011-ZZ-DR-C-0559	P02
	Proposed Foul Water Drainage-Sheet 10	664015-1275-PEV-FNC0011-ZZ-DR-C-0560	P02
	Drainage Details-SW Outfall 01	664015-1275-PEV-FNC0011-ZZ-DR-C-6509	P01
	Drainage Details-SW Outfall 02	664015-1275-PEV-FNC0011-ZZ-DR-C-6510	P01
	Proposed Earthworks-Mound Sections	664015-1275-PEV-FNC0011-ZZ-DR-C-0604	P01
	Indicative Drawings for Information only		
	Site Block Plan Proposed-PLANNING-OPA Overlay	664015-1275-PEV-FNC0011-ZZ-DR-A-9008	P05
	Site-Aerial View-Proposed-PLANNING	664015-1275-PEV-FNC0011-ZZ-SK-A-9600	P04
	Site-Vehicle Approach View-Proposed- PLANNING	664015-1275-PEV-FNC0011-ZZ-SK-A-9601	P05
	Site-Pedestrian Approach View-Proposed- PLANNING	664015-1275-PEV-FNC0011-ZZ-SK-A-9602	P05

	Site-Block Plan-Building Heights-Proposed-PLANNING	664015-1275-PEV-FNC0011-ZZ-DR-A-9201	P03
	Site-Block Plan-Site Levels-Proposed-PLANNING	664015-1275-PEV-FNC0011-ZZ-DR-A-9202	P03
	Site-Site Sections-Proposed-PLANNING	664015-1275-PEV-FNC0011-ZZ-DR-A-9401	P02
	Site-Demolition Plan-Proposed-PLANNING	664015-1275-PEV-FNC0011-ZZ-DR-A-9103	P02
Entrance Resource Hub	Elevations-Ext-Planning-Colour	664015-1275-PEV-FNC1011-ZZ-DR-A-9010	P04
Support Building	Elevations-Ext-Planning-Colour	664015-1275-PEV-FNC2021-ZZ-DR-A-9010	P03
Central Services	Elevations-Ext-Planning-Colour	664015-1275-PEV-FNC3011-ZZ-DR-A-9010	P02
Kitchen	Elevations-Ext-Planning-Colour	664015-1275-PEV-FNC4011-ZZ-DR-A-9010	P02
Houseblock	Elevations-Ext-Planning-Colour	664015-1275-PEV-FNC7021-ZZ-DR-A-9010	P04
	Swept Path Analysis-Electric Tug	664015-1275-PEV-FNC0011-ZZ-DR-C-2601	P04
	Swept Path Analysis-Fire Tender	664015-1275-PEV-FNC0011-ZZ-DR-C-2602	P04
	Swept Path Analysis-Articulated HGV	664015-1275-PEV-FNC0011-ZZ-DR-C-2603	P04
	Swept Path Analysis-Light Goods Vehicle	664015-1275-PEV-FNC0011-ZZ-DR-C-2605	P04
	Swept Path Analysis-Standard Design Vehicle	664015-1275-PEV-FNC0011-ZZ-DR-C-2606	P03
	Swept Path Analysis-Refuse Vehicle	664015-1275-PEV-FNC0011-ZZ-DR-C-2607	P03
	Swept Path Analysis-Small Skip Lorry	664015-1275-PEV-FNC0011-ZZ-DR-C-2608	P04

1.25 With these introductory points in mind, the remainder of this Statement is structured as follows.

- **Section 2** reviews relevant planning history as the context for the reserved matters application.
- **Section 3** describes generally the rationale behind the way that the site has been laid out.
- **Section 4** describes the detailed site layout.
- **Section 5** describes the external appearance of the buildings.
- **Section 6** describes the proposed landscaping.
- **Section 7** summarises the points that have emerged from the MoJ's stakeholder engagement process.
- **Section 8** includes our summary and conclusions.

2. The Outline Planning Consent (18/04105/STOUT)

2.1 On 21 April 2017, the Ministry of Justice submitted an OPA (17/01494/STOUT) for a new 1,017 place Category C Adult Male prison on land adjacent to the existing prison in Full Sutton. Following the approval of 17/01494/STOUT in July 2017 the Ministry of Justice reviewed the strategic need for new Adult Male Category C prison places and concluded that the capacity of the new prison should increase to 1,440. The maximum floorspace permitted in July 2017 was not sufficient to support the delivery of the larger prison and so the proposals were updated to increase its size. A second outline planning application (18/04105/STOUT) was prepared. The updated proposals differed from the 2017 OPA by way of:

- an increase in the number of houseblocks from four to six,
- an increase in the number of buildings thought necessary to deliver the prison (to 17),
- an increase in car parking to support the larger prison (but in the same part of the site); and
- the proposed energy centre being placed outside the secure perimeter fence.

2.2 Before submitting the 2018 OPA the MoJ held public exhibitions at Full Sutton Training Centre and Stamford Bridge Methodist Church Hall on 20 and 21 November 2018. The Ministry of Justice submitted the revised outline planning application in December 2018. Outline planning permission was granted in September 2019 and authorised the following matters:

- the use of the site for the provision of new custodial development,
- the construction of buildings not exceeding 59,500 sqm (GEA) in aggregate,
- maximum building heights,
- permanent vehicular access to the new prison from the estate road to HMP Full Sutton; and
- temporary construction access from a point on Moor Lane.

2.3 The matters which were left for consideration through the reserved matters process were:

- the detailed layout of the site, buildings and parking areas,
- the detailed proposals for landscaping outside the secure perimeter fence; and
- the external appearance of the new buildings.

2.4 The OPA was accompanied by various indicative plans and drawings. Indicative material is used to give an LPA, residents and all other stakeholders a clear indication of how the applicant expects its development to be designed and laid out. It also allows the potential technical, environmental and amenity impacts of the proposals to be assessed and tested at the outline planning application stage. The Indicative Layout Plan submitted with the OPA is attached at **Appendix 1** and shows the following.

- Vehicular access from the existing access road to HMP Full Sutton and its junction with Moor Lane.
- Car parking in the north set back from Moor Lane behind existing and proposed landscaping.
- A landscaping zone/buffer extending around the entirety of the western and southern boundaries of the site, connecting with the existing landscaping and planting associated with HMP Full Sutton.
- A substantial additional area of landscaping on the western side of the site.
- A secure perimeter fence enclosing much of the site except the car park and landscaping zones. Land within the secure perimeter fence can be divided into two broad zones. The northern zone contains the prison entrance hub and various

administration and support buildings. The southern zone includes the houseblocks and associated outdoor facilities. In total, 17 buildings are shown.

- An existing ditch course culverted beneath the secure compound but retained in open channel to the west of the secure compound. A new ditch course is shown skirting the south-eastern, southern and western boundaries and connecting back to the culvert beneath Moor Lane.

2.5 The OPA was also supported by drawings showing building footprints and elevations. Whilst they were presented as indicative drawings they showed buildings that were being constructed on other prison developments at the time. The detail they showed was not submitted for approval but allowed the potential impacts of the proposed development to be tested and understood.

2.6 A Landscape Mitigation Plan gave some detail of how the MoJ expected the Landscaping Zones would be planted so as to mitigate the landscape and visual impacts of the proposed development. This drawing was included at Figure 6.1 of the Landscape and Visual Impact Assessment (LVIA) and formed the basis of that assessment and is appended to this Planning Statement (**Appendix 2**).

Technical and Environmental Reports

2.7 The 2018 OPA was supported by various technical and environmental reports which considered the potential impacts of the development. The reports submitted included the following.

- Flood Risk Assessment and Outline Drainage Strategy.
- Transport Assessment and Outline Travel Plan.
- Air Quality Assessment and Report.
- Ecological Impact Assessment.
- Phase 1 Preliminary Risk Assessment (Ground Conditions).
- Noise Impact Assessment.
- Landscape and Visual Impact Assessment (including Outline Landscape Mitigation).
- Socio-Economic Assessment.

2.8 The technical and environmental reports assessed the potential impacts of the development based on the amount of development proposed and, where relevant, the indicative layout, building design and landscaping proposals submitted in support of the OPA. The LPA reviewed and accepted the conclusions that were reached and, where necessary, added planning conditions to the outline planning consent to ensure that the impacts that limited to those that were predicted or which require the submission of further details for approval before the development is either constructed or occupied.

2.9 None of the assessments prepared in 2018 need to be reviewed or updated to support the reserved matters application, because the issues that they addressed were fully considered and taken into account by the LPA when the outline planning consent was granted. The MoJ has, nonetheless, prepared an updated LVIA to review landscape and visual impact implications and to test whether the conclusions that were reached on the basis of the indicative material provided at the outline stage remain robust in the context of the detailed layout and landscaping proposals. We shall return to this later.

Foul and Surface Water Drainage

2.10 Whilst foul and surface water drainage details are not 'reserved matters', the LPA added a condition to the outline consent (Condition 8) which requires that details of foul and surface water drainage proposals be submitted at the same time as the reserved matters application. These details might ordinarily be required prior to development commencing, rather than at the

same time as the submission of the reserved matters application. In this case, however, the LPA was keen to ensure that the layout is able to accommodate any particular requirements for foul or surface water drainage, and that consideration has been given to the capacity of the existing networks to avoid any need for sewage to be tankered off site. The reserved matters application is accompanied by Foul and Surface Water Drainage Reports which confirm that the site can accommodate the foul and surface water drainage infrastructure required, and explain the consultations that have been carried out with the Lead Local Flood Authority (ERYC) and Yorkshire Water. We have also prepared a separate application to discharge Condition 8 based on the same information submitted with the reserved matters application.

The New Ditch

- 2.11 Following the grant of the 2018 OPA the Ministry of Justice reviewed its programme for completing the detailed design of the new prison and then for constructing the new facility in time for it to be commissioned in 2025. Having done so, it concluded that it was necessary to accelerate the design and delivery of certain key infrastructure works, including the formation of the new ditch, ahead of the submission of the Reserved Matters Application. Consequently, an application for full planning permission for the formation of a new ditch course was submitted in October 2020 and was granted in March 2021. The detailed alignment of the ditch at the point at which it connects with the existing watercourse in the wetland area in the eastern part of the site was subsequently amended by way of a 'non-material amendment' application under s.96A of the Town and Country Planning Act 1990. The new ditch construction works are underway, and we highlight this matter only to explain why the alignment of the proposed ditch is not one of the matters to be fixed through the 'layout' reserved matter. Instead, the Site Layout Plan includes the new ditch on its approved alignment and arranges the landscaping and other elements of the development around that approved alignment.
- 2.12 It is worth noting also that whilst the indicative material submitted with the OPA proposed that the existing ditch course be placed into a culvert beneath the secure compound, the proposal is now to infill the ditch and to divert it through the new ditch. This has benefits in relation to landscaping (which are discussed later) and means that the ditch has a primary surface water drainage function, alongside the benefits that it provides in terms of habitat creation and opportunities to increase biodiversity on the site. It is worth noting also that whilst the new ditch was assumed at the OPA stage to be needed to provide replacement habitat for a population of water vole on the site, more recent surveys have confirmed that there is no longer a population of water vole on the site so that this is no longer a primary function of the new ditch.

3. Site Layout and Design Principles

- 3.1 This section provides a general overview of the key issues that have influenced the layout of the site and the disposition of uses across it. It is followed by sections which consider each of the reserved matters (layout, external appearance and landscaping) in more detail, and in the context of the general explanation that we give in this section.
- 3.2 As noted already, the new prison at Full Sutton was first promoted by way of an OPA in 2017, and as part of government's Prison Estate Transformation Programme. The objective is to transform the prison estate to better support effective prisoner rehabilitation and to reduce reoffending rates and official press releases at the time confirmed that the investment would be used to modernise the prison estate to make it *"even more efficient, safe and focussed on supporting prisoner rehabilitation"*. This was to be achieved in part by building new, modern prisons containing better education facilities and other rehabilitative services. To reinforce the point, Lord Chancellor and Secretary of State for Justice at the time, Elizabeth Truss, delivered an oral statement to the House on prisoner reform in November 2016 explaining government's proposals for investment on staffing and other measures and in the delivery of a *"modern, fit for purpose estate"*.
- 3.3 Given the transformational nature of the programme the MoJ set about reviewing the design of the buildings that would best deliver its objectives of supporting prisoner rehabilitation and reducing reoffending rates. Since then, planning permissions have been granted for new prison development at Wellingborough (HMP Five Wells) and at Glen Parva (to replace HMP YOI Glen Parva). Those developments are currently being constructed and are delivering modern, purpose designed buildings very different from traditional custodial buildings, and which are designed with the overarching programme objectives to the fore.
- 3.4 When it submitted the 2018 OPA the MoJ submitted indicative building designs to support its application. Those were based on buildings which were being delivered at HMP Five Wells and which were planned to be delivered at Glen Parva. Since then the MoJ has further refined the design of the buildings so that most differ from those shown indicatively in the material submitted in support of the 2018 OPA. The design of the houseblocks has not changed materially. The design of the various support buildings has changed, mainly because those functions are now to be delivered in fewer, larger buildings. These latest designs are part of this reserved matters application and will be used in all other new prison projects.
- 3.5 The government has recently reconfirmed its commitment to improving the custodial estate. The new prison at Full Sutton is now to be delivered as part of the New Prisons Programme, which was announced by the Prime Minister in Summer 2020. A principal objective of the New Prison Programme remains the replacement of an ageing custodial estate with new, modern prisons built as places of safety and reform, and the design of the buildings must support that objective.

Operational Safety and Security Standards

- 3.6 Whilst the New Prison Programme is based on modern and updated building designs, it remains necessary for the MoJ and Her Majesty's Prisons and Probation Service (HMPPS) to apply a series of established operational standards to the layouts of its new prison developments. These must be applied to ensure a safe and secure environment for both prisoners and staff, and to ensure that security standards are met according to the category of prison that is being proposed.
- 3.7 We do not provide a detailed explanation of the operational standards and specifications that all new prison development must adhere to, not least as there is some sensitivity around those matters. However, there are some fundamental principles that must be applied in all cases and which are significant drivers of the arrangement of buildings, fence lines and other elements of development, and, therefore, significant drivers of site layout, both at Full Sutton and elsewhere. They include:
- the maintenance of a minimum width of clear open ground outside the secure perimeter fence,
 - ensuring appropriate and safe distance separation between buildings and external fence lines; and

- maintaining clear lines of site between buildings and across open areas within the secure compound.

3.8 All standards are applied with the objective of ensuring prisoner and staff safety and, in this case, to ensure that the development will meet the security standards necessary for a Category C establishment. Whilst there may be some scope for variation or departure from operational standards, that scope is very limited.

Site Zoning Principles (Generally and at Full Sutton)

3.9 New prison developments are generally laid out around three principal zones.

- The first is the secure compound which comprises the secure perimeter fence, internal fence lines and the various buildings that make up the prison. These are typically organised into a 'residential zone' containing houseblocks and outdoor exercise areas, and a 'support zone' containing all the necessary administrative and support buildings, visitor centre, kitchen, workshops and other space. That is the case at Full Sutton, with the 'residential zone' being located in the southern part of the site and the 'support zone' being located in the northern part of the site.
- The second comprises the public zone which generally, and in this case, contains the site access, car parking and servicing areas, and the managed hard and soft landscaping elements associated with the prison entrance and car park.
- The third is the landscaped zone which comprises land not required for either of the above purposes and which becomes available to accommodate structural landscaping elements designed to soften the appearance of the development as that landscaping matures over time.

3.10 These site zoning principles were applied in the first outline planning application for Full Sutton which was approved in September 2017, and were carried forward into the 2018 OPA which was permitted in September 2019, and are evident in the Indicative Layout Plans submitted with both applications.

3.11 The principal drivers of the layout of the site were explained in Section 4 in the Planning Statements submitted in support of both of those application. In the case of the 2018 OPA, Section 4 set out the key similarities and differences between the first and second outline applications at Full Sutton, concluding that key site layout principles were very similar across both proposals. The same is true of the detailed proposals that now comprise the Reserved Matters Application when those are compared with the indicative layout plan and other material submitted with the 2018 OPA. In summary:

- a) access will remain as per both outline consents and is to be from the existing access road to HMP Full Sutton and its junction with Moor Lane, and with a temporary construction access off Moor Lane,
- b) car parking will remain in the same broad location in the northern part of the site but with minor changes to its layout,
- c) the secure perimeter fence will run on a similar alignment to that shown previously. However, its north-western corner has been chamfered and its western alignment has been extended slightly to accommodate the updates to building design that have arisen since the second outline permission was granted,
- d) the layout carries forward the landscaping principles set out at the outline planning application stage, with a landscaping zone proposed around the entire western boundary, but with the addition of a planted bund of 2.0 to 3.5m high incorporated through a majority of the landscaping zone to respond to representations made to the MoJ during stakeholder consultation in recent months,

- e) the ditch course across the centre of the site will now be infilled (and the new ditch will still be provided) which allows for more landscaping and planting in the central-western part of the site,
- f) six houseblocks are proposed in similar locations to those shown indicatively at outline application stage, but only three outdoor multi-use games areas are now proposed amongst the houseblocks, rather than the six proposed previously, and
- g) support buildings remain in the northern part of the site, albeit there are now fewer, larger footprint buildings.

Site Specific Considerations

3.12 In addition to the application of HMPPS' minimum operational standards and requirements, and the incorporation of the most recent building designs into reserved matters applications, the layout of new prison developments must also respond to site conditions. The relevant considerations in the case of the proposed development at Full Sutton are as follows.

- There are existing tree belts and screens around HMP Full Sutton which fall largely within the operational demise of HMP Full Sutton and outside the area covered by the new prison development. The principle that has been adopted is that the existing landscaping belts should be retained, and with only minimal change where that is required to support access to the new development and the most efficient layout of the site.
- There is a mounded area in the northern part of the site which was shown retained on the Indicative Site Layout plans provided with both the first and second OPAs so as to minimise the requirement for substantial cut and fill works and to maintain screening of the new development from the north and north-east.
- The proximity of the site to the existing high security establishment at HMP Full Sutton is a material consideration with it being necessary to maintain separation between the two estates.
- The site contains a wetland area and ditch course, both of which are understood to be key elements of the surface water drainage system associated with HMP Full Sutton, so that they must be retained or re-provided.
- The wetland area has some ecological value which it is considered important to retain and, in any event, the land is unsuitable for development.
- A surface water drainage connection must be maintained across the site. At the time of both OPAs the existing ditch course was shown culverted beneath the secure compound, and with a new ditch cut around the periphery of the site, which was proposed to provide essential replacement habitat for water vole. The situation has changed with there no longer being water vole on the site. At the same time, the most recent building designs require that the prison is delivered in fewer buildings with larger footprints. This, coupled with the application of HMPPS' operational standards in respect of separation between buildings and fence lines, would require any culvert(s) to pass beneath buildings, roads and fence lines, and at minimal depth to allow for connections back into the ditch course as it passes beneath Moor Lane, negating the option of culverting the ditch. On this basis, the new ditch is now an essential element of the surface water drainage system of the new prison and must be accommodated around the periphery of the site. In addition, the existing ditch must be infilled.
- There are a small number of residential and other properties to the north-west, west and south-west of the Site which will have views towards the new prison, as they do towards HMP Full Sutton. In addition, the new development must be considered in respect of its impact on the landscape to the west of Full Sutton and to the east of Stamford Bridge.

For these reasons, the provision of Landscaping Zones around the western and southern boundaries of the Site is necessary, has been a consistent feature of both outline planning applications, and is maintained in the Reserved Matters Application.

- 3.13 It is this combination of (i) modern building designs which support the key objectives of the New Prisons Programme; (ii) the application of established and necessary site zoning principles; (iii) the need to closely adhere to HMPPS' minimum operational safety and security specifications and standards; and (iv) site specific considerations, which drive and determine the necessary disposition of uses and elements of development across the site, as per the indicative material submitted with the OPAs, and moving into the detail of the Reserved Matters Application.

Indicative Material

- 3.14 The OPAs were supported by Indicative Site Layout Plans and Indicative Building Designs so as to give the LPA, residents and all other stakeholders an appreciation of how the MoJ expected its development to be designed and laid out. In this way the potential technical, environmental and amenity impacts of the proposals were able to be robustly assessed and tested at the outline planning application stage.
- 3.15 By its nature indicative material does not comprise a formal submission or an 'approved' element of the outline planning consent. At the same time it is necessary for OPAs which are promoting substantial development proposals to provide a clear indication of how a site is likely to be laid out in detail at the reserved matters stage. An LPA has to be able to carry out a thorough assessment of the impacts of an OPA and its performance against the policies within its development plan and site specific matters, if it is to conclude that those impacts are acceptable such that planning permission may be granted. Consequently, whilst they were indicative, the plans submitted with the 2018 OPA were intended to show how the site would be likely to be developed in detail and were presented and described in the Planning Statements on this basis.
- 3.16 Whilst neither the applicant nor the LPA are bound by the indicative material, it is entirely appropriate for the reserved matters to follow that closely, given that the impacts of the development, if arranged as per the indicative plans, has already been tested and found to be acceptable, subject to the imposition of conditions and consideration of the detail of the reserved matters application. At the same time, there is some variation between the indicative material submitted with the 2018 OPA and the detailed content of the reserved matters submissions. For example:
- the prison will comprise fewer buildings than previously thought due to ongoing design development,
 - the revised building designs coupled with HMPPS standards mean that they will be placed differently across the site, but still organised into the zones described above,
 - a decentralised energy strategy negates the need for the energy centre previously shown,
 - the detailed arrangement of the access and car parking layouts has been refined,
 - it is no longer possible to culvert the existing ditch,
 - infilling the ditch increases the area available for planting and removes the line of sight that there would have been into the secure compound; and
 - the precise alignment and width of the landscape planting zones will differ, but not materially.
- 3.17 We have noted already that the 2018 OPA was supported by various reports which considered the potential impact of the development in relation to the matters which they covered. The technical and environmental reports were based on the amount of development proposed and, where relevant, the indicative layout, building design and landscaping proposals. This was certainly the case in relation to the implications of the development for both landscape and visual impact/amenity considerations, with the assessment of the magnitude of those impacts being considered through the LVIA. The LVIA considered

these matters on the basis of the Landscaping Zones and landscaping principles shown on the Indicative Site Layout plan and the Landscape Strategy included in the LVIA (Figure 6.1). The LVIA assumed a landscape zone of typically 15m depth (not incorporating any bund), planted with trees which would reach mature heights of in excess of 8m (and the visualisations assumed landscaping at 8m). Adopting these assumptions, the LVIA concluded that, with mitigation, the impacts would be acceptable.

3.18 The LPA accepted the conclusions that were reached. It is on this basis that the reserved matters application has adopted similar principles in relation to landscaping strategy/zones and planting, as those matters have already been tested and found to generate acceptable outcomes.

Summary

3.19 Whilst there is no obligation or requirement for the reserved matters application to adopt the principles adopted by indicative material at the outline planning application stage, there is, equally, no need to depart from those principles, particularly when, as in this case, they generate outcomes that have been rigorously tested at the outline planning application stage and found to be acceptable.

3.20 Two other matters are worth emphasising at this point.

- First, the application of operational security and safety standards to the latest building designs, alongside the site specific matters noted above, including those relating to surface water drainage, do not allow for any materially different approach to site zoning and layout than that adopted at the time of the 2018 OPA. Put another way, there is no scope to increase the land available for landscaping in the western part of the site (but no need to do so in any event, having regard to the conclusions of the 2018 LVIA, which were reached on the basis of essentially similar landscaping proposals, and the 2021 LVIA, which incorporates the reserved matters application proposals in respect of layout, buildings and landscaping).
- Second, the MoJ has been asked during stakeholder consultation whether the reserved matters proposals could incorporate an earth bund within the landscaping zone of up to 10m high. In considering this request, the MoJ has adopted the assumption that slopes should not have a gradient greater than 1:3 so as to support woodland planting. Assuming a plateau on the top of any bund of say 5m width, and that no retaining structures would be included, the land take required for a 10m high bund would be a corridor of circa 65m wide. If any bund were not be planted the gradient of its slopes might increase to 1:2, but the required corridor would still be circa 45m wide. Having regard to this there is no scope to incorporate a bund of any significant height within the landscaping zones. Moreover, HMPPS standards do not allow for a bund above 2m high adjacent to a secure perimeter fence. And in any event, the conclusions of the LVIA in 2018 did not include any allowance for a bund and assumed tree planting on level ground.

3.21 Notwithstanding the above, the MoJ has considered the opportunity to use material excavated by the creation of the new ditch and has concluded that this may be used to construct a bund within the Landscaping Zone of not less than 2m and increasing to 3.5 m where that is possible due to greater separation from the secure perimeter fence. The incorporation of this bund will reinforce the conclusions reached at the OPA stage and again in relation to the reserved matters application that the land available for landscaping, planted appropriately and as it matures, will appropriately mitigate the landscape and visual impact of the development.

4. Detailed Layout Proposals

4.1 The 2018 OPA was supported by an Indicative Masterplan which organised the site into three main zones:

- a secure prison compound containing 17 buildings comprising the prison within a secure fence;
- a public zone to include the site access and car parking for staff and visitors; and
- land to be used for landscaping and ecological mitigation works.

4.2 Access, which was approved as part of the 2018 OPA, was shown to be taken via a spur from the access road that serves the existing HMP Full Sutton, and which itself is accessed via Moor Lane. That access arrangement also supported a concentration of car parking in the northern part of the site. In turn, the arrangement of the car parking meant it was possible to protect residential amenity by maintaining substantial separation between new buildings and housing in the western part of Full Sutton.

4.3 Furthermore, the layout shown on the indicative layout plan placed the tallest buildings, the residential house blocks, in the southern part of the site and away from residential properties. That arrangement was linked with an indicative landscape strategy that showed a planting zone along the western and southern parts of the site. Together, the landscaping strategy and the distribution of buildings around the site meant that the visual impact of the development was minimised.

4.4 These general matters provide context to describing the detailed site layout proposed in this reserved matters application. The matters which informed the organisation of the site on the indicative layout plan at the outline planning application stage continue to drive the detailed layout and, with that in mind, the content of the Detailed Layout Plan is explained as follows.

4.5 The detailed site layout submitted with the Reserved Matters Application continues to organise the site into the same three main zones. We describe each briefly below, and then set out a series of more detailed points to further describe the proposed layout.

- **The Public Zone** at the northern end of the site still comprises the access road and staff and visitor parking with the number of staff and visitor spaces being consistent with the number proposed at the outline application stage, and justified as per the content of the Transport Assessment.
- **The Secure Zone** now accommodates 12 buildings which collectively support the functions that were previously expected to be accommodated in 17 buildings. As described in the previous section, the buildings shown on the Indicative Site Plan submitted with the OPA were based on buildings which, at the time, the MoJ was promoting elsewhere. The MoJ has continued to refine the design of its buildings, and the way in which uses are organised within them, so that some uses have been combined into single buildings rather than being provided in separate blocks. Each is located according to critical adjacencies with other building functions, including the houseblocks, and according to pedestrian and vehicular flows around the site. Each is supported by appropriate servicing areas and compounds, and by landscaping, and all are separated by internal fences as required. The whole area is enclosed within a 5.2m high secure perimeter fence, and with inner fences defining prisoner free zones within the external secure perimeter fence.
- **The landscaping zone** comprises land on the northern, western and southern sides of the site for landscaping, including the formation of a planted earth bund. Planting on the bund and elsewhere along the boundaries will comprise woodland planting with two different 'mixes' according to the proportion of deciduous and evergreen trees, and according to the maturity of specimens when planted. Whilst the amount of land set aside for woodland planting has reduced slightly from that shown on the indicative plan submitted with the 2018 OPA, it remains of a sufficient area to deliver an effective landscaping scheme that adheres to the principles that were set out by the 2018 OPA.

The Public Zone

- 4.6 Access is still be taken from Moor Lane and via the estate road that serves the existing HMP Full Sutton, in accordance with the arrangement that was approved as part of the 2018 OPA. The access road to the new prison will lead to the public zone and skirts around the existing mounded area to the car park.
- 4.7 The Detailed Layout Plan shows 121 car parking spaces for use by visitors, and 257 car parking spaces for use by staff, in addition to 10 accessible parking spaces and covered bicycle parking. Visitor spaces are to be located in the eastern part of the car park adjacent to the Entrance Resource Hub. The staff car park is situated to the north-west of the visitors' parking zone, and is to be accessed by the same entrance road.
- 4.8 The car parking area also includes areas for cycle parking, and a bus stop and bus turnaround area, as well as an extended bell mouth adjacent to the prison gate to allow for vehicle turning and support servicing needs. All circulation spaces and areas have been tracked to ensure that they comply with all relevant standards.
- 4.9 There is no longer a separate energy centre, which had been expected at the OPA stage, and which was sited in the public zone and in the north-western part of the site. The new buildings are now proposed to each carry their own plant and equipment for energy generation, which removes the need for a centralised building that supplies energy to the rest of the prison.
- 4.10 South of the car park, the Detailed Layout Plan shows the east to west alignment of the 5.2m secure perimeter fence, which ties into Building FNC1011 which is the 'Entrance Hub' for the new prison. That section of the perimeter fence, and the entrance to Building FNC1011, marks the transition from the Public Zone to the Secure Zone.

The Secure Compound

- 4.11 The Secure Zone is arranged in a manner consistent with the indicative layout provided with the 2018 OPA. In the central part of the site are administrative and 'functional' buildings, including the kitchen block (building FNC4011) and the 'central services hub' (building FNC3011), which will include education, faith and healthcare uses / activities. Also shown in this section is building FNC5011, which is the single workshop building and which, as we have already explained, is subject to a separate planning application.
- 4.12 The remainder of the secure compound, extending from the central part of the site to the southern end, comprises the residential accommodation blocks. There are six houseblocks shown, which is consistent with the number shown in the 2018 OPA. These houseblocks will be four storeys and are the tallest buildings on the site. The number of storeys, and their general placement, is again consistent with what was shown on material that supported the 2018 OPA. The smaller, single-storey CASU (building FNC6011) is to be located in the south-eastern corner of the secure compound and, as explained in Section 1, the details of that building will follow if the LPA grants permission for a non-material amendment to Condition 4.
- 4.13 Three multi-use games areas will be used for exercise by prisoners and are shown on the Detailed Site Layout Plan. This contrasts with the six shown in the 2018 OPA given that each is now to be shared between a pair of houseblocks.
- 4.14 A network of roadways and footpaths is shown within the boundaries of the secure compound. These will facilitate movement around the site. The roadways and footpaths at the edges of the secure compound will be prisoner-free areas and are denoted on the Detailed Site Layout by black hatching.
- 4.15 A series of internal fence lines are also shown on the Detailed Site Layout Plan. These will maintain security by separating buildings and also preventing access by prisoners to the prisoner-free areas.

The Landscaping Zone

- 4.16 The layout has been designed so as to provide space for tree planting and landscaping on the northern, southern and western parts of the site. Landscaped areas are shown between the car park and the boundary of the site to Moor Lane. Adjacent to the secure compound there is a need to maintain a 15m wide strip of clear open ground immediately beyond the secure perimeter fence as an operational requirement of the prison. All areas beyond this 'sterile zone' are available for landscape planting.
- 4.17 Following recent engagement with stakeholders, the MoJ and its project team has concluded that it is possible to provide an earth bund of between 2m and 3.5m in height along much of the western side of the site and along the whole of the southern boundary. We provide more detail on the bund, and landscaping more generally, in the section dedicated to the Landscaping Reserved Matter.
- 4.18 The Detailed Site Layout shows the alignment of the new ditch that is to be formed, and for which planning permission was granted in March of this year. The new ditch runs south from the existing wetland area in the west of the site, and then along the southern boundary of the site, before returning to follow the western site boundary where the ditch will connect into an existing culvert, which carries the watercourse beneath Moor Lane. For reasons set out earlier, the Detailed Site Layout does not include the existing ditch which is now to be infilled. As explained elsewhere, the infilling of the ditch presents an opportunity to enhance the outcomes in relation to the screening of the new prison buildings from the west.
- 4.19 Existing planting areas in the eastern part of the site in and around the wetland area are retained on the Detailed Layout Plan, as is planting in the north-eastern part of the site, except where it is necessary to remove trees to facilitate access or other layout considerations, but with removals kept to a minimum. Similarly, hedgerows and tree specimens within those hedgerows along the western boundary with Moor Lane are retained within the layout wherever possible.
- 4.20 Drawing 664015-1275-PEV-FNC0011-ZZ-DR-A-9008 Rev P04 shows the footprints of the 12 buildings now proposed (in grey) on the Detailed Site Layout superimposed over the footprints of the 17 buildings previously shown on the indicative material (in red). It also shows the alignment of the secure fence indicated at the OPA stage and that now proposed. Whilst the placement of the buildings has changed, and principally in the northern part of the site, the zoning and layout principles are retained, as is the integrity of the landscape planting and mitigation strategy around the site boundaries.
- 4.21 Drawing 664015-1275-PEV-FNC0011-ZZ-SK-A-9600 P04 (Site-Aerial View-Proposed) is an illustrative drawing which seeks to aid understanding of the way in which the various elements of the proposed new prison are arranged on the site and relative to each other, how the secure compound is placed within the landscape planting zones around it, and how the proposals relate to Moor Lane and HMP Full Sutton.

5. The External Appearance of Buildings

5.1 The buildings that were shown on the indicative layout plan submitted with the 2018 OPA, and the indicative building plans and elevations also submitted, were based on those which the MoJ was, at the time that the 2018 OPA was submitted, promoting as part of its proposals for new prisons in Wellingborough (HMP Five Wells) and in Leicester (Glen Parva). The MoJ has, though, continued to refine the design of buildings that will be delivered in its New Prisons Programme, and this has led to amendments to the designs of the buildings that were shown on the indicative material at OPA stage. Further information on the design of the new buildings is included in the Design Statement prepared by Pick Everard.

General Building Appearance

5.2 The submitted drawings show the elevations of all of the proposed buildings. We have submitted two versions for each building; one set is black and white and the other is coloured. There is no difference between the two in terms of design. The black and white versions are submitted for determination and are 'formal' drawings. The coloured versions are submitted to make them easier to read and interpret but are submitted for information only because we expect that the LPA will add a condition to any reserved matters approval confirming that materials and colour are to be agreed. The colours shown are, therefore, indicative, but are those which are being applied at HMP Five Wells and at Glen Parva.

5.3 The buildings will be of a modern, simple and functional appearance, and are likely to be finished in a combination of painted concrete, brickwork and glazing. Some buildings are likely to incorporate materials palettes of metal panelling and brickwork, including the Entrance Resource Hub, which is the building that staff and visitors will enter from the car park (and so which will have an elevation fronting onto the public zone), and the houseblocks, which are the tallest buildings on the site. Drawings 664015-1275-PEV-FNC0011-ZZ-SK-A-9601 P04 (Site-Vehicle Approach View-Proposed) and 664015-1275-PEV-FNC0011-ZZ-SK-A-9602 P04 (Site-Pedestrian Approach View-Proposed) provide impressions of the appearance of the Entrance Resource Hub from the Public Zone. In addition, rendered images of some of the buildings are included in the visualisations in the Appendices to the LVIA (June 2021).

Building Heights

5.4 The LPA attached a condition to the outline planning permission to control the maximum amount of floorspace that could be constructed, and the maximum height of buildings, with reference to the indicative height of each building type that was referred to in the OPA submissions. The consolidation of uses into fewer buildings as part of the detailed proposals has, mostly, been achieved without the height of buildings containing combined uses exceeding the maximum height indicated for the individual buildings containing those uses in the OPA submissions.

5.5 The exceptions are the workshop building and, to a very limited extent, the CASU. Importantly, the tallest buildings on the site, the houseblocks, are in accordance with the maximum height allowed by Condition 4. The table below summarises the position in relation to each building (excluding plant in all cases), with the second column confirming their maximum height within the reserved matters application, and the third column confirming the maximum heights permitted for the corresponding building, or buildings where more than one have been combined in the current design. Only two of the 12 buildings (the CASU and workshop) exceed the permitted height.

	Max height of Building (RMA)	Max height allowed by Cond 4
Entrance Resource Hub (FNC1011)	12.7m	Buildings 03 (13m) and 06 (8.8m)
Support Building (FNC2011)	8.63m	Building 04 – 8.7m
Central Services Hub (FNC3011)	10.1m	Buildings 07 (12.5m) and 09 (5.4m)

Kitchen (FNC4011)	9.77m	Building 05 (9.8m)
Houseblock (FNC7021)	12.225m	Building 10 – 14m
CASU (FNC6011)	5.96m	Building 11 – 5.2m
Workshop (FNC5011)	11.85m	Buildings 01 (10.2m) and 02 (10.4m)

Building Roofs

- 5.6 The indicative material submitted with the 2018 OPA showed a mix of flat and pitched roofs being incorporated into the various building types. That remains the case in the detailed designs. The tallest buildings, the houseblocks, will have flat roofs, as will the CASU, the Entrance Resource Hub and the Central Services Hub building. These buildings will have plant mounted on their roofs.
- 5.7 Other buildings, including the workshop, the kitchen and the support services building, will include pitched roofs. Photovoltaic panels will be installed on certain buildings and are shown on the roof plans submitted for each building.

6. The Landscaping Proposals

Overall Landscaping Strategy and Principles

- 6.1 The proposals for landscaping are important in relation to the conclusions that are reached in respect of Landscape and Visual Impact given their potential over time to soften, filter and screen views of the built development from outside the site boundary and from the west in particular. They are also important to the internal environment of the proposed prison and to the amenity of both staff and prisoners.
- 6.2 The indicative material submitted with the 2018 OPA showed an Indicative Planting Zone outside the secure perimeter fence in the northern, western and southern parts of the site. The OPA was also accompanied by a Landscape and Visual Impact Assessment (LVIA), prepared by Ramboll. Figure 6.1 of the LVIA comprised a 'Landscape Mitigation' drawing, which gave an indication of the types of landscaping that might be provided in those outer landscaping zones. It was with reference to Figure 6.1 that Ramboll concluded, and ERYC agreed when granting outline planning permission, that the Landscape and Visual Impacts of the proposed development could be appropriately mitigated. A copy is attached at **Appendix 2**.
- 6.3 The Planning Statement (December 2018) included a description, at paragraphs 4.53 to 4.56, of the principles that had been adopted in the indicative Landscape Mitigation drawing and which were expected to be carried forward to the reserved matters application. The Planning Statement said the following.

Landscaping is one of the reserved matters and so the detail of the landscape proposals will be determined later in the planning process. However, the Applicant proposes to establish a number of principles that will be applied in the detailed landscape strategy in due course. These remain as they were with the 2017 OPA and will include the following.

- a) *Existing trees and hedges along the site's western boundary with Moor Lane will be retained. Similarly the existing trees and scrub around the water attenuation feature on the western side of HMP Full Sutton (which also has ecological value) will be retained.*
- b) *Landscaping to the west of the entrance to HMP Full Sutton and its car parks will be retained, except at the point at which access is secured from the estate road to HMP Full Sutton into the new prison site. As noted above the number of trees to be removed will be kept to a minimum.*
- c) *Immediately outside the secure fence there will be a footpath/roadway of up to 5m wide to allow prison staff to access all areas of the fence. Beyond this, and where local conditions allow, there will be a strip of clear open ground (comprising mown grass) of a minimum width of 15 m.*
- d) *Beyond the open ground is land that may be landscaped. This is expected to be a combination of hedge and tree planting which, on reaching maturity, will soften the appearance of the western side of the compound. A landscape zone is indicated on the Site Layout Plan, with a typical depth of 15m.*
- e) *Open spaces between buildings and areas within the secure compound will generally be surfaced with short mown grass, although there will be opportunities for additional planting within any 'prisoner free zones' within the secure perimeter fence. There will be fences and gates separating buildings and zones within the compound.*

- 4.54 *The objective is to soften the appearance of the development from the west in short and longer distance views. Moreover, the nature of the landscaping must not prejudice the security requirements of the prison and the need for clear ground and visibility along the fence line.*
- 4.55 *Outside the key landscaped areas, any remaining land not used for roads, parking or hard standing will be appropriately surfaced and will be likely to comprise mainly grass. Consideration will be given to that at the appropriate time and having regard to design and operational requirements and management regimes.*
- 4.56 *Details for all areas of landscaping will be submitted as part of the reserved matters application in due course. However, the principles of the landscaping strategy set out above are incorporated into the Landscape & Visual Impact Assessment, as was the case with the 2017 OPA. Figure 6.1 within the Landscape and Visual Impact Assessment is an Outline Landscape Mitigation Plan which shows how the principles described above are incorporated in the proposals.*

The Landscape Strategy Plan

- 6.4 The MoJ has now worked up the detail of the hard and soft landscaping proposals for the new prison, and these are shown on the Landscape Plans which are in the drawings pack. The reserved matters application includes both a 'Landscape Strategy Plan' and 'Hard and Soft Landscape' drawings. The Landscape Strategy Plan is intended to articulate the general approach to landscaping that is proposed and to demonstrate how the principles that were set out and established at the outline stage have been taken into the reserved matters application. The Landscape Strategy Plan (Ref 1275-PEV-FNC0011-XX-DR-L-0302) is submitted as a formal drawing for consideration and is also reproduced as Figure 6.1 in the updated LVIA (June 2021). A copy is attached at **Appendix 3**.
- 6.5 A comparison between the Landscape Mitigation drawing presented in the 2018 LVIA and the Landscape Strategy Drawing submitted with the reserved matters application and included in the 2021 LVIA shows that the principles that were set out in the December 2018 Planning Statement have been retained and *"applied to the detailed landscape strategy"*. There are many similarities between the two.
- The strategy remains to wrap planting around the western side of the development.
 - It remains essential to retain a 15m clear zone around the secure perimeter fence to meet MoJ technical and security standards.
 - The width of the planting zones varies around the boundary (as it did in the indicative material at OPA stage) but with the principle being that the MoJ has provided as wide a planting zone as possible, having regard to all other matters that determine the overall site layout (as set out at Section 3.0).
 - The planting will comprise native species and incorporate a mix that will provide a variety of form, height and colour, to support biodiversity objectives, and to provide interest in terms of amenity.
 - The species differ in terms of their height and canopy/crown spread at maturity, but the principle that has been adopted is that, in combination, and as they mature, their canopies will extend the full width of the landscape zones.
 - It will be important that management regimes ensure that there is no, or very limited, encroachment into the 15m clear zone on the eastern edge of the landscaping zone. This is reflected on the Landscape Strategy Plan. The 'outer' (western) edge may be managed differently, and with the opportunity for canopies to extend outside the western edge of the Planting Zones, where that does not cause issues due to proximity to Moor Lane and the new ditch course.

- The species chosen may also be managed so that they mature into either taller individual specimens or will create dense scrub cover at lower levels (which will have similar screening effects to a hedgerow). This means that the landscape zones will include this variety of cover at lower and higher levels and to filter and screen views of the development.

6.6 Whilst the principles that were established at the outline planning application stage are incorporated and developed in the reserved matters application, there are four principal differences between the Landscape Mitigation drawing presented in the 2018 LVIA and the Landscape Strategy Drawing submitted with the reserved matters application. These are as follows.

- a) First, the area of planting in the western-most part of the site is not as wide as it was in 2018 due to the changes to layout that have resulted from changes to building designs and the application of MoJ technical and operational standards to a layout which includes those updated building designs (as described in Section 3.0). It remains, nonetheless, a substantial area that can accommodate a significant amount of planting that will achieve the same mitigation effects as before.
- b) Second, the landscaping zone is no longer broken by the ditch course being retained in culvert which means that the break in the landscaping that is evident on the 2018 Landscape Mitigation drawing is no longer present.
- c) Third, the Landscape Planting Zone now includes a planted earth bund from the south-western tip of the car-parking area along the entire western boundary and the whole of the southern boundary. This is no less than 2m high and increases to 3.5m high in the westernmost part of the site. The management of the selected species so that there will be a combination of taller woodland planting on the outer slope of the bund, and lower understorey planting throughout the landscape zone and towards the top of the bund. This will provide foliage and screening at both lower and higher levels and will provide more effective mitigation sooner after planting than if there were no bund, and if the planting were managed so as to comprise only individual tree specimens with no understorey. The Landscape Strategy Plan does not specifically annotate the proposed shrub (or understorey) planting
- d) Fourth, there are now two different types of 'Woodland Mix'. Both incorporate within their mix 25% of heavier standard trees alongside the predominant standard of planting (which is with 'transplant' standard specimens). In Woodland Mix 1 the 25% comprises 'Select Standard' specimens (typically 3.0 – 3.5m tall when planted) whereas in Woodland Mix 2 the 25% comprises 'Extra Heavy Standard' specimens (typically 4.25-6.0m tall when planted). Woodland Mix 2 is to be used in the southern part of the site.

6.7 The width of the Landscape Planting Zone (and so the anticipated width of canopy/cover in the mature scheme) varies along its length, as it did in the indicative drawing submitted with the 2018 OPA. As noted above the landscaping will be managed so as to largely avoid any encroachment into the 15m clear zone so that the eastern edge of the landscape zone shown on the Landscape Strategy Plan is 'fixed' whereas the western edge is less sensitive so that its management may be less rigid.

- In the northern part of the site adjacent to the existing mound and car park the zone is up to approximately 15m wide, but closer to 8m wide in parts, as it was in the 2018 OPA.
- In the western part of the site it is up to approximately 60m wide and incorporates the bund at 3.5m high.
- In the south-western part of the site it is no less than 15m wide and in places up to 25m wide (and so more substantial overall than the 'typical' width of 15m assumed in the 2018 OPA).
- On the southern boundary it is typically 25m wide.

Hard and Soft Landscape Drawings

6.8 There are four Hard and Soft Landscape Drawings covering sections of the Site. They provide details of the landscaping that is proposed within the Secure Compound and in the Public Zone. The principles adopted in these areas of the site in relation to species and hardworks materials are explained in the final section of the Design Statement and are not repeated here. The Hard and Soft Landscape drawings should be read having regard to the explanation that we have given above in relation to the overall landscaping strategy articulated by the Landscape Strategy Plan. We would note the following matters in particular.

- The drawings show woodland planting only on the outside slope of the proposed bund. This is on the basis that trees planted on the top of the bund will have canopies that spread over the inside slope and as far as the western edge of the 15m clear zone, without encroaching into that zone.
- The drawings do not separately show or indicate any understorey planting as described above. This is because the same species are to be planted to provide both the taller and lower coverage, with that achieved through management practices.
- The drawings show a clean line at the edge of the planting zones because they denote planting areas rather than canopy/foilage cover.
- The drawings do not show individual specimens but assume a planting grid of 1x1m, except in Woodland Mix 2 where the grid is extended to 2x2m for the Extra Heavy Standard trees within that Mix.
- Across all the landscaping zones and including planting in the Secure Compound and Public Zone, the planting scheme will include approximately 17,700 trees and shrubs.
- The drawings also confirm the existing trees and hedgerows that are to be retained around the site boundaries.

Species Mix, Standards and Mature Heights

6.9 The Landscape Strategy Plan includes schedules of the species that are to be planted and the size of the specimens when they are planted. The planting mix within the schedule has changed since the MoJ carried out its community and stakeholder consultation exercise in response to comments received. The changes are as follows.

- First, consultees expressed a view that there should be a greater proportion of evergreen species so as to give better year-round screening of the development once the landscaping matures. The MoJ has since then increased the proportion of evergreen species in the mix from 10% to 20%. In so doing the MoJ notes that evergreen species are generally slower growing than deciduous.
- Second, consultees expressed a view that there should be a greater proportion of heavier standard trees planted at 'Day 1' than was shown by the consultation material. The MoJ has adjusted its proposals to include heavier standard specimens in those parts of the Landscape Planting Zone that run from a point adjacent to Houseblock 01 to a point adjacent to the southern wing of Houseblock 03. In this part of the site the planting mix will comprise Alder, Aspen, Silver Birch and Field Maple. The density of planting in this area will on a 2x2m grid (rather than a 1x1m grid), but all specimens will be planted at 18-20 cm girth which equates to 'Extra Heavy Standard'. In the remainder of the Landscape Planting Zone specimens will be planted at 10-12 cm girth which equates to 'Select Standard'. The MoJ has concentrated Extra Heavy Standard trees in this part of the site given that (i) the southern part of the site

accommodates the tallest buildings; and (ii) it is at this point that the relationship between the new development and residential property is closest.

- 6.10 Consultees also asked about rates of growth. In this regard, Alder, Aspen, Silver Birch and Field Maple are the fastest growing species selected and will typically grow at 60+ cm per year. This is relevant to the consideration of how long it might take for the planting to mature and reach 8m tall (with 8m being the height assumed in the assessment and visualisations in both the 2018 and June 2021 LVIA's). The answer will, of course, vary along the length of the boundary according to the combination of the height the bund at any point along the boundary and the 'standard' at which trees are planted. 'Extra Heavy Standard' trees are typically 4.5-6.0m tall when planted, compared with 'Select Standard' trees at typically 3.0-3.5m tall. This would suggest that the combined height of bund and trees at Year 1 could vary from 6.5 - 7.0m (i.e. 'Select Standard' trees planted on a 3.5m section of bund) to 6.5 - 8.0 m (i.e. 'Extra Heavy Standard' trees planted on a 2.0m high section of bund) and less where lower standard specimens ('Whips, Feathered, Light Standard' or 'Standard') are planted. Adopting conservative assumptions about growth rates of, say, 40cm a year across all species, would suggest that after 5 years the combined height of bund and planting could reach 8.5 - 10.5m. What is, of course, true is that, as a consequence of planting being a mix of various 'standards', and a mix of species with differing growth rates and differing canopy density, the height reached may be less and will not be uniform at 5 years, or any later interval.
- 6.11 It is also proposed to establish the planting belts early, and once the bund has been formed, following the completion of ditch construction works (with the arisings from those works being used to construct the bund) so as to support earlier screening of the development.
- 6.12 In relation to management and maintenance of the landscaping, the MoJ anticipates that the LPA may add a condition to the reserved matters consent that will require details of management to be provided (there is no such condition on the outline consent) and to ensure that any planting that might fail is replaced. In general terms, however, the operator of the prison will be contractually obliged to maintain the landscaped areas of the site.
- 6.13 The updated (June 2021) LVIA considers the efficacy of the Landscape Planting Proposals from the perspective of mitigation of both landscape and visual impacts, and from a number of viewpoints that were agreed with the LPA when the first OPA was prepared in 2017. The conclusions of the June 2021 LVIA remain that significant impacts on landscape character will be highly localised and temporary and that there will be some beneficial effects as proposed screen planting matures. In relation to visual effects the LVIA concludes that significant effects will be confined to locations on Moor Lane and in the vicinity of Burtonfields Farm but that those will reduce and become non-significant once the proposed landscaping has matured. These conclusions were reached having regard to the planting proposals that were prepared before the MoJ revised its proposals having taken consultation comments into account. However, the updated planting proposal make no difference to the conclusions that are reached in the LVIA, given that the proposals have been enhanced since the LVIA was prepared.

Landscaping in the Public Zone

- 6.14 The boundary between the new access road and the foot of the existing mound will be planted with individual trees. That tree planting will continue along the boundary between the car park and the mound and will then tie into the planting that is proposed along the outer edge of the car park, facing towards Moor Lane.
- 6.15 As was shown in the material that supported the 2018 8OPA, some existing trees will need to be removed to form the access road spur from the existing estate road that serves HMP Full Sutton. The landscaping drawings confirm however that the majority of existing trees in this location will be retained.

- 6.16 Within the car park, opportunities have been taken at the ends of car park aisles to provide a mix of ornamental shrubs and trees. A mix of ornamental shrubs and multi-stemmed trees will also be planted around the entrance to prison from building FNC1011.

Internal Planting

- 6.17 To maintain security inside the perimeter fence, it is essential that there are clear lines of sight and no features that may support the opportunity of escape. It is for this reason that, inside the secure compound, the soft landscaping in those areas into which prisoners will go will comprise of amenity grassland, with small clusters of garden and orchard trees planted in the amenity grassed areas between the houseblocks, and limited ornamental shrub planting around the MUGAs. Each houseblock will also be bordered by strips of reinforced grass.

- 6.18 In the prisoner-free areas, wildflower meadow planting will be provided. This will extend beyond the perimeter fence into the clear open ground beyond (and then tying into the boundary planting that we described earlier).

Hard Landscaping Materials

- 6.19 The Landscape Plan shows that the access road and car park in the public zone, and the roadways inside the secure compound, will be formed of macadam. The same is true of the footpaths in the public zone and inside the secure compound.
- 6.20 Elsewhere in the secure compound there will be discrete use of other hard landscaping materials, including textured concrete, self-binding gravel and resin-bound gravel. The multi-use games areas will be formed of a polymeric (i.e. rubber-bound) surface.

7. Community Consultation

7.1 We have prepared a separate Statement of Community Involvement (SCI) which explains the consultation and engagement that the MoJ has carried out during the preparation of the Reserved Matters Application, but also since the first OPA was submitted in 2017. This Section of the Planning Statement summarises the key points arising from community consultation and how those have been addressed in the Reserved Matters Application. The MoJ has consulted primarily through the following means.

7.2 The MoJ produced a dedicated **consultation website** for the reserved matters consultation. The purpose of the consultation website was to:

- detail the length of the consultation period,
- offer details on the date and time of the consultation webinars, and how to attend those,
- provide access to the Consultation Document; and
- explain how members of the community could provide feedback and ask questions

7.3 The MoJ also hosted four **consultation webinars** on the 16th, 17th, 18th and 21st June. The consultation webinars took place on Zoom and comprised a 25-minute presentation of the proposals by the MoJ and Avison Young and a 35 minute allowance for questions and answers. Those who had registered to attend were able to ask questions of the project team via email ahead of the webinars, and those who attended the webinars were able to ask questions using the Q&A function on Zoom. The SCI confirms the key themes that arose from comments submitted online, and before and during the webinars.

7.4 The following table combines the main themes raised during the consultation webinars with the feedback submitted via email and provides the MoJ’s response to each theme. It should be noted that this is an edited version of that which is included in the SCI, and that it only includes those matters which relate to the reserved matters (i.e. layout, landscaping and the external appearance of buildings) whereas that in the SCI responds to all points whether related to the reserved matters applications or not.

Issue or Questions Raised	Applicant’s Response
<p>Various landscaping related matters including the amount of landscape planting, the mix of deciduous and evergreen planting, the maturity/height of specimens when planted, the time it will take to establish and the height it may reach at 5 year intervals post planting, and responsibility for maintenance s it becomes established and in the longer term.</p>	<p>The MoJ understands the concerns that have been raised in relation to the efficacy of the landscaping proposals. As a matter of principle, however, the MoJ remains confident that the amount of land that is available to support woodland and other planting will accommodate a landscaping scheme that will mitigate the impacts of the development over time. The MoJ has tested this by way of a revised LVIA submitted which has been updated to reflect the detailed layout and finalised building designs that are promoted through the reserved matters application, and to reflect the changes that have been made to the landscaping zones. The LVIA reaches the same conclusions in relation to the reserved matters proposals that it reached in relation to the indicative material submitted with the outline planning application. Notwithstanding the above, the MoJ has reviewed its landscape planting proposals and has:</p> <ul style="list-style-type: none"> • adjusted the mix of deciduous and evergreen species that was shown on the Landscape Strategy Plan included in the online exhibition (Rev P04) so as to increase the proportion of evergreen from 10% to 20%,

	<ul style="list-style-type: none"> adjusted the mix to include a greater proportion of heavier standard trees than was assumed on the Landscape Strategy Plan included in the online exhibition; and concentrated heavier standard planting in the south-western part of the landscaping zones, noting that the tallest buildings on the site are located to the south of the secure compound.
Details of the proposed method for discharging foul and surface water drainage were not included in the consultation material raising concerns about the ability to accommodate drainage infrastructure on the site.	Consultees are correct that details of these matters were not provided with the consultation material. However, the MoJ is required by Condition 8 imposed on the outline planning consent to submit details of the proposed means of disposal of foul and surface water drainage for the whole site to the Local Planning Authority alongside the application for reserved matters. Details have been submitted by way of the 'Proposed Surface Water Drainage Strategy Report 'and 'Proposed Surface Water Drainage Strategy Report' prepared by Perfect Circle.
The height of the proposed buildings and relationship to the maximum building heights controlled by the outline planning consent	Condition 4 of the outline planning consent limits the maximum height of buildings according to the heights set out in the Table within the condition. This Planning Statement has explained that all buildings fall within the maximum parameters permitted in Condition 4 except for the workshop (which is subject to a separate, concurrent application for Full Planning Permission) and the CASU (which the MoJ proposes to accommodate by way of a non-material amendment to the maximum height of the CASU in Condition 4 followed by substitution of drawings to include the CASU).
The potential for overlooking of residential dwellings by inmates	The MoJ does not consider that there is any significant potential for overlooking from upper floors of the houseblocks into any residential property as a consequence of the very small number of properties to the west and south-west of that part of the site which contains the houseblocks, and the distance separation between the houseblocks and adjacent dwellings.
Measures to minimise the impact of the development on existing residents	We consider this question to be more relevant to the outline planning application process, and would note that the potential for impacts on the amenity of residents was considered carefully at that time (including by way of the noise and air quality assessments, the Landscape and Visual Impact Assessment and the Transport Assessment) and that the LPA added any necessary conditions to the outline planning consent where it considered that to be necessary <i>"in the interests of residential amenity and the character of the area"</i> (Conditions 4 (maximum building heights), 5 (Lighting), 10 (noise insulation of any pumping station), 11 (noise levels from fixed plant), 12 (road traffic noise at the site access), 13 (construction working hours),14 (construction method statement), 15 (construction emissions management), 17 (safe access) and 19 (construction traffic management plan). At the same time, the MoJ has ensured that the reserved matters application has adopted and carried forward the important principles that were established at the outline application stage in relation to the incorporation of strategic landscaping zones and building heights and siting. It has also responded to consultees by incorporating a planted earth bund into its proposals and has adjusted its

	<p>landscaping proposals to reflect comments on planting mix and the maturity of planting at Year 1.</p>
<p>A desire to see an earth bund provided on the site’s western boundary and for the height of any bund to be as great as possible adjacent to the closest residential dwellings</p>	<p>The MoJ has been pleased to be able to provide a bund along the site’s western and southern boundaries in response to requests made by stakeholders. The height of the bund is limited, however, by (i) the amount of land that is available to accommodate a bund with maximum slope gradients of 1:3, so as to support woodland planting on its slopes; and (ii) the MoJ’s technical standards which do not allow for a structure of more than 2m high adjacent to the clear zone outside the secure perimeter fence (for security reasons). Where there is a greater width of land available it has been possible to increase the height of the bund to 3.5m but that is the maximum that may be achieved.</p>
<p>The impact of the development on landscape and visual amenity</p>	<p>In this regard, the reserved matters application is supported by an updated Landscape and Visual Impact Assessment prepared by Ramboll (who also prepared the LVIAs in support of both outline planning applications) to take account of the latest layout, building designs and landscaping proposals. The conclusions of the LVIA remain that significant impacts on landscape character will be highly localised and temporary and that there will be some beneficial effects as proposed screen planting matures. In relation to visual effects the LVIA concludes that significant effects will be confined to locations on Moor Lane and in the vicinity of Burtonfields Farm but that those will reduce and become non-significant once the proposed landscaping has matured.</p>

7.5 In addition to community consultation, the MoJ has discussed its proposals with the LPA and with various consultees including Yorkshire Water, the Lead Local Flood Authority and Natural England.

Appendix 1

Indicative Layout Plan

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Do not scale from drawings. Verify all dimensions on site prior to construction. This drawing is to be read in conjunction with all relevant documents and drawings. Report all discrepancies to MoJ immediately.
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NOTES

KEY

- Planning Application Boundary
- - - Adjacent MoJ Properties
- Outer Perimeter Fence
- Internal Fence
- Retaining Wall (Indicative Only)
- Parking and External Circulation Area
- Existing Trees outside the secure perimeter (Indicative Only)
- Landscape Planting Zone (Indicative Only)
- Landscape Planting Zone (Indicative Only)

Total Area within the Red Boundary:
213875.62 sqm (21.39 Ha)

REV	DATE	DESCRIPTION	DRAW	CHK
1	30-11-18	Outline Planning Application	SP	ES
KEY PLAN				

PROJECT STATUS: OPA

CLIENT: Ministry of Justice

ESTATE DIRECTORATE

DRAWING TITLE: Proposed Site Plan

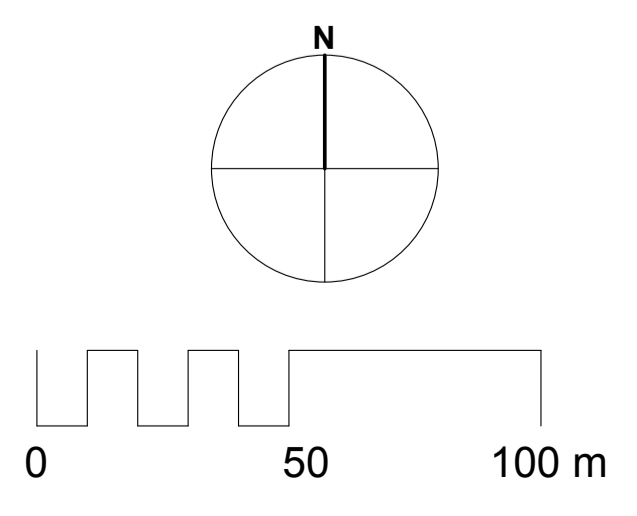
PROJECT Name / Site: MoJ Land at Moor Lane Full Sutton

PROJECT ADDRESS: Moor Lane Full Sutton, York

ORIGINATOR LOGO: DRAWN BY SP DATE 15/10/18
CHK BY ES DATE 16/10/18
APPD BY AW DATE 30/11/18

DRAWING NUMBER: (PIMS-BPRN-ORIGINATOR-VOLUME-LEVEL-TYPE-ROLE-NUMBER)
664015-1275-MAC-ZZ-XX-DR-A-0001

SHEET NO. of 1 of 1 SCALE 1:1500 ORIG. SHEET SIZE @ A1 REV. 1 DATA SECURITY CLASSIFICATION S2



Appendix 2

Landscape Strategy Drawing (2018)

PLANTING/SEEDING SCHEDULES

Ornamental Trees

Common Name	Latin Name	Girth	Height	Clear Stem
Hornbeam	<i>Carpinus betulus</i>	14-16cm	425-600cm	Min 200cm
Container (75L) grown Extra Heavy Standard trees.				

Formal Hedgerow

Common Name	Latin Name	%	Form	Age
Common Beech	<i>Fagus Sylvatica</i>	100%	Seedling	1+0

Hedgerow

Common Name	Latin Name	%	Form	Age
Hawthorn	<i>Crataegus monogyna</i>	25%	Seedling	1+0
Common Beech	<i>Fagus Sylvatica</i>	50%	Seedling	1+0
Blackthorn	<i>Prunus spinosa</i>	25%	Seedling	1+0

Planted as cell crown of height 0.4 m - 0.6 m a double staggered row - 6 plants per metre, in two rows about 25 cm apart with plants at approximately 45 cm in each row. Planted in Tubex tubes.

Hedgerow Trees

Common Name	Latin Name	Girth	Height (cm)	Clear Stem
Rowan	<i>Sorbus aucuparia</i>	8-10cm	250-300	Min 175cm
Small leaved Lime	<i>Tilia cordata</i>	8-10cm	250-300	Min 175cm
Himalayan Birch	<i>Betula utilis jacquemontii</i>	8-10cm	250-300	Min 175cm

Bare Root (B) Standard trees.

Exiting Hedgerow to be gapped up and thickened

Common Name	Latin Name	%	Form	Age
Blackthorn	<i>Prunus spinosa</i>	25%	Seedling	1+0
English Oak	<i>Quercus robur</i>	25%	Seedling	1+0
Hawthorn	<i>Crataegus monogyna</i>	50%	Seedling	1+0

Planted as cell crown of height 0.4 m - 0.6 m a double staggered row - 6 plants per metre, in two rows about 25 cm apart with plants at approximately 45 cm in each row. Planted in Tubex tubes.

Woodland Planting

Tree Species

Common Name	Latin Name	%	Form	Age
Alder	<i>Alnus glutinosa</i>	5%	Seedling	1+0
Aspen	<i>Populus tremula</i>	5%	Seedling	1+0
Betula pendula	<i>Silver Birch</i>	10%	Seedling	1+0
Bird Cherry	<i>Prunus padus</i>	15%	Seedling	1+0
English Oak	<i>Quercus robur</i>	20%	Seedling	1+0
Field Maple	<i>Acer campestre</i>	5%	Seedling	1+0
Mountain-ash/Rowan	<i>Sorbus aucuparia</i>	5%	Seedling	1+0
Scots Pine	<i>Pinus sylvestris</i>	5%	Seedling	1+0

Sub Canopy/Shrub Species

Common Name	Latin Name	%	Form	Age
Elder	<i>Sambucus nigra</i>	5%	Seedling	1+0
Goat willow	<i>Salix caprea</i>	5%	Seedling	1+0
Hazel	<i>Corylus avellana</i>	10%	Seedling	1+0
Dog Rose	<i>Rosa canina</i>	5%	Seedling	1+0
Holly	<i>Ilex aquifolia</i>	5%	Branched	Con

Species Rich Grassland

Equivalent mix to EmorsgateSeeds EG10 Tussock Grass Mixture, which includes existing species such as:

Common Name	Latin Name
Cocksfoot	<i>Dactylis glomerata</i>
Red Fescue	<i>Festuca rubra</i>

Marginal Aquatic Planting

Equivalent mix to EmorsgateSeeds EP1F Wild Flower for Pond Edges, which includes water vole favourites:

Common Name	Latin Name
Gypsywort	<i>Lycopus europaeus</i>
Marsh Marigold	<i>Caltha palustris</i>
Meadow Sweet	<i>Filipendula ulmaria</i>
Wild Angelica	<i>Angelica sylvestris</i>
Yellow Flag	<i>Iris pseudacorus</i>



Key

- Site Boundary
- Existing Wet Woodland
- Existing Woodland Belt
- Existing Hedgerow with Trees to be gapped up
- Proposed Species Rich Grassland
- Proposed Woodland
- Enhanced Pond/ Proposed Ditches
- Proposed Marginal Aquatic Planting
- Proposed Hedgerow/ Trees
- Proposed Ornamental Trees
- Proposed Formal Hedgerow/ Ornamental Trees

Title Figure 6.1: Landscape Mitigation

Project No. UK18-23369

Site Land at Moor Lane, Full Sutton

Client Ministry of Justice

Date November 2018

Scale n/a @ A3

Issue 1 **Drawn by** BB



Appendix 3

Landscape Strategy Drawing (2021)



PLANTING / SEEDING SCHEDULES

Entrance Road Avenue Trees

Common Name	Latin Name	Girth	Height	Clear Stem
Field Maple	Acer Campestre 'Elsrijk'	18- 20cmg	4.5 - 5m	Min 2m
Container (50x40cm) grown Advanced Nursery Stock trees				

Car Park Ornamental Trees

Common Name	Latin Name	Girth	Height	Clear Stem
Field Maple 'Streetwise'	Acer Campestre 'Streetwise'	18- 20cmg	4.5 - 5m	Min 2m
Purple Leaved Norway Maple	Acer platanoides 'Crimson King'	18- 20cmg	4.5 - 5m	Min 2m
Whitebeam	Sorbus aria 'Lutscens'	18- 20cmg	4.5 - 5m	Min 2m
Container (50x40cm) grown Advanced Nursery Stock trees				

Woodland Planting

Common Name	Latin Name	Girth	%	Height	Form	Age
Alder	Alnus glutinosa	10 - 12cm	5%	3 - 3.5m	Select Standard	-
Aspen	Populus tremula	10 - 12cm	5%	3 - 3.5m	Select Standard	-
Silver Birch	Betula pendula	10 - 12cm	10%	3 - 3.5m	Select Standard	-
Field Maple	Acer campestre	10 - 12cm	5%	3 - 3.5m	Select Standard	-
English Oak	Quercus robur	-	20%	60 - 80cm	Transplant	1+1
Scots Pine	Pinus sylvestris	-	5%	40 - 60cm	-	-

Shrub Species

Common Name	Latin Name	%	Height	Form	Age
Bird Cherry	Prunus padus	15%	60 - 80cm	Transplant	1+1
Mountain-ash / Rowan	Sorbus aucuparia	5%	60 - 80cm	Transplant	1+1
Elder	Sambucus nigra	5%	40 - 60cm	-	-
Goat Willow	Salix caprea	5%	60 - 80cm	-	0/1
Hazel	Corylus avellana	5%	60 - 80cm	Transplant	1+1
Holly	Ilex aquifolia	5%	60 - 80cm	-	-
Dog Rose	Rosa canina	10%	60 - 80cm	Transplant	1+1

Grasses / Meadows

Species Rich Grassland / wildflower Meadows

Equivalent mix to Germinal RE2 Lowland Meadow mixture which includes species such as:

Common Name	Latin Name
Slender Creeping Red Fescue	Festuca rubra littoralis
Meadow Fescue	Festuca pratensis
Crested Dogstail	Cynosturus cristatus
Tall Oat-grass	Arrhenatherum elatius
Yorkshire Fog	Holcus lanatis
Creeping Bent	Agrostis stolonifera
Smooth Stalked Meadow Grass	Poa pratensis

Wetland Meadow for Proposed Ditch

Equivalent mix to Germinal RE3 River Floodplain / Water Meadow mixture which includes species that benefit water voles:

Common Name	Latin Name
Smooth Stalked Meadow Grass	Poa Pratensis
Yorkshire Fog	Holcus lanatis
Soft-Rush	Juncus effusus
Pendulous Sedge	Carex pendula
Yorkshire Fog	Holcus lanatis
Water Avens	Geum rivale
Common Valerian	Valeriana officinalis
Marsh Marigold	Caltha palustris



KEY

- Site Boundary
- MoJ Ownership Boundary
- Perimeter Security Fence
- Extent of Perimeter Fence Clearance Zone
- Existing Wet Woodland
- Existing Woodland Belt
- Existing Hedgerow with Trees
- Existing Pond and Ditches
- Existing Grassland
- Species Rich Grassland / Wildflower Meadow
- Proposed Woodland
- Proposed Ditch and Habitat Creation
- Proposed Avenue and Ornamental Trees

Title	Figure 6.1: Landscape Mitigation	
Project No.	1700002858	
Site	Land at Moor Lane, Full Sutton	
Client	Ministry of Justice	
Date	June 2021	
Scale	As Shown	
Issue	1	Drawn by -

