

Development Control Committee **26 April 2023**

Planning Application DC/22/1953/FUL – PLOT 1520, Fortress Way, Rougham

Date registered:	10 November 2022	Expiry date:	9 February 2023 EOT 28 April 2023
Case officer:	Connor Vince	Recommendation:	Approve application
Parish:	Rushbrooke with Rougham	Ward:	Moreton Hall
Proposal:	Planning application - ambulance hub including vehicle servicing, car parking and landscaping		
Site:	Plot 1520, Fortress Way, Rougham		
Applicant:	Mr Ashley Seymour		

Synopsis:

Application under the Town and Country Planning Act 1990 and the (Listed Building and Conservation Areas) Act 1990 and associated matters.

Recommendation:

It is recommended that the committee determine the attached application and associated matters.

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Background:

The application is before the Development Control Committee as it represents a departure from the development plan but is recommended for approval. The proposed use which is Sui Generis does not technically fall within the allocation for Suffolk Business Park, which is for B1 and B8 uses.

West Suffolk Council also has a financial interest in the land.

Proposal:

1. The planning application seeks consent for an ambulance depot including vehicle servicing, car parking and landscaping. The application is a resubmission of the previously approved DC/19/0042/FUL, with further design and layout changes proposed. The primary function of the building remains the same, this being for the storage of ambulances and their ongoing replenishment of medical facilities and cleaning. The depot will act as a base for clinical staff to start and finish shift work. The building will also have training and office rooms. The second function of the building is for the maintenance and repair of the ambulances in the workshop. The proposed use overall is 'Sui Generis', i.e a use that does not fit into a specific use class.

Application supporting material:

2. Information, as amended, submitted with the application as follows:
 - Application Form
 - Planning Statement
 - Flood Risk Assessment
 - Flood Risk SUDs Assessment
 - Land Contamination Assessment
 - Land Contamination Assessment – Site August 2021
 - Land Contamination Appendices A-E
 - Land Contamination Appendices F-H
 - Landscape Management Plan
 - Ecological Survey
 - Arboricultural Assessment
 - Ground Gas Monitoring Report
 - Transport Assessment
 - Highways Impact Technical Note
 - Design and Access Statement
 - Design & Access Statement Continued
 - Noise Impact Assessment
 - Energy Statement
 - BREEAM Pre-Assessment
 - Amended – Lighting Product Data Sheet
 - Amended – External Lighting Layout
 - Exploratory Hole Location Plan
 - Outline Drainage Strategy
 - External Site Levels
 - External Work Details
 - Roof Canopy Details
 - Bin Store Details
 - Roof Plan – Proposed

- Location Plan
 - Proposed Ground Floor Plan
 - Proposed First Floor Plan
 - Amended – Proposed Site Plan
 - Amended – Proposed Elevations 1
 - Amended – Proposed Elevations 2
 - Amended – Sustainable Drainage Assessment
 - Amended – Proposed Site Plan (Planting)
 - Amended – Proposed Planting Plan 1
 - Amended – Proposed Planting Plan 2
3. The full list of approved plans and documents, which are relevant to the proposed development are detailed in full within Condition 2 in the recommendations section of the report.

Site details:

4. The site is situated north of the A14 and south of Fortress Way which links Lady Miriam Way South and Rougham Tower Avenue. The site is currently undeveloped and was previously agricultural fields. Prior to the site's agricultural use, the site formed part of the Rougham Airfield which was a Second World War airfield.
5. To the west is the original Suffolk Business Park where Sealeys, Denny Brothers and other business are situated. Directly to the north is a B8 warehouse unit as approved under DC/16/2825/OUT and subsequently DC/21/1802/RM. To the east are two further B8 units approved under DC/17/1765/RM.

Planning history:

6. Outline consent granted under DC/16/2825/OUT for B1 and B8 uses including structural landscaping, and an internal access road. One plot was identified as being for RC Treatts and was for a B1, B2 and B8 use. The internal access road has now been completed and has been called Fortress Way.
7. Planning permission was granted at St Edmundsbury Borough Council's Development Control Committee on 7 March 2019 under DC/19/0042/FUL for the construction of an access road and Ambulance Depot with associated landscaping and parking. The permission has now lapsed and this application seeks to re-establish the permission with minor changes.

Consultations:

8. Rougham Parish Council: Support
9. Jo Churchill MP: "I am pleased to support the development of a new state-of-the-art hub for the East of England Ambulance Service NHS Trust on the outskirts of Bury St. Edmunds.

Providing for improved access to the A14 and improving response times for service users, both rurally and within the town, is of paramount importance for residents of Suffolk, particularly within our growing community.

A modernised building, providing improved space for vehicle maintenance, stocking, cleaning and prepping, ready for deployment will facilitate faster life-saving care to patients.

The improved staff facilities and a sustainable and environmental design must work hand in hand with improved patient care. Minimising the environmental impact and the use of green materials and construction methods is of vital importance.

Within these parameters and with the desire to improve patient care and outcomes, I am pleased that the development of this improved facility is being considered."

10. Councillor Birgitte Mager (Ward Member): "Thank you very much indeed for this planning application. The most important part of any new planning application to the new Suffolk business park is an assurance that all traffic will have to access the site from the new junction that West Suffolk put in at great expense. I cannot see that mentioned in the planning application. Could you please reassure the Councillors that this will form key part of the application."
11. Suffolk County Council Minerals and Waste: No objections.
12. Suffolk County Council Highways: No objections subject to conditions concerning bin storage, car parking and cycle parking compliance.
13. Suffolk County Council Development Contributions: No comment.
14. Suffolk County Council Lead Local Flood Authority: No objections following receipt of further supporting information and comments, subject to conditions concerning a strategy for surface water disposal and subsequent implementation, submission of surface water drainage report and submission of a Construction Surface Water Management Plan.
15. Suffolk County Council Archaeology: The application area has already been subjected to an archaeological evaluation and no further archaeological work or mitigation is required.
16. National Highways: Final comments - No objections – National Highways do not consider the proposal to have an impact on the Strategic Road Network in the vicinity of the scheme which includes A14 Junction 44 and 45.
17. WSC Economic Development: Economic Development supports the application to develop a new ambulance hub, including vehicle servicing, car parking and landscaping at Suffolk Park, Bury St Edmunds. Bury St Edmunds has experienced significant growth since the development of the Ambulance Service facility in Brooklands Close. Providing first class healthcare services and highly skilled specialist employment in Bury St Edmunds is important, not only for the health of the local community but to support the continued growth of the whole of West Suffolk.
18. Natural England: No objection.

19. WSC Environment Team: No objections subject to EV charging condition – Re-wording of condition agreed with Environment Team Officer and agent as per recommended conditions below.
20. WSC Environment Team Sustainability: Following the submission of BREEAM Pre-Assessment, no objections are raised subject to a condition requiring confirmation of the BREEAM Excellent standard being achieved.
21. WSC Waste Management: No comment.
22. Place Services Ecology: No objections subject to conditions requiring submission of a biodiversity enhancement strategy and compliance with ecological appraisal recommendations.
23. Place Services Landscaping: No objections subject to a hard landscaping scheme condition – Having received amended plans which detail the pond as raised, PS Landscaping have confirmed the earthworks condition is no longer required.
24. WSC Public Health & Housing: "I confirm I have reviewed this application and considered the implications from a noise and nuisance impact perspective. Having considered the findings of the noise report, I am satisfied that the assessment has considered the impact on all relevant sensitive receptors, and I agree with the conclusions made. I therefore do not object to this application."
25. **Representations**: No representations received.
26. **Policy**: On 1 April 2019 Forest Heath District Council and St Edmundsbury Borough Council were replaced by a single authority, West Suffolk Council. The development plans for the previous local planning authorities were carried forward to the new Council by regulation. The development plans remain in place for the new West Suffolk Council and, with the exception of the Joint Development Management Policies Document (which had been adopted by both councils), set out policies for defined geographical areas within the new authority. It is therefore necessary to determine this application with reference to policies set out in the plans produced by the now dissolved St Edmundsbury Borough Council.
27. The following policies of the Joint Development Management Policies Document, the Bury St Edmunds Vision 2031 Document and the St Edmundsbury Core Strategy December 2010 have been taken into account in the consideration of this application:
28. Joint Development Management Policies Document (adopted February 2015):
 - Policy DM1: Presumption in Favour of Sustainable Development
 - Policy DM2: Creating Places – Development Principles and Local Distinctiveness
 - Policy DM3: Masterplans
 - Policy DM6: Flooding and Sustainable Drainage
 - Policy DM7: Sustainable Design and Construction
 - Policy DM11: Protected Species
 - Policy DM12: Mitigation, Enhancement, Management and Monitoring of Biodiversity
 - Policy DM13: Landscape Features

- Policy DM14: Protecting and Enhancing Natural Resources, Minimising Pollution and Safeguarding from Hazards
- Policy DM20: Archaeology
- Policy DM45: Transport Assessment and Travel Plans
- Policy DM46: Parking Standards

29. Bury St Edmunds Vision 2031 (adopted September 2014):

- Policy BV1: Presumption in Favour of Sustainable Development
- Policy BV13: Strategic Site – Extension to Suffolk Business Park, Moreton Hall, Bury St Edmunds
- Policy BV14: General Employment Areas – Bury St Edmunds

30. St Edmundsbury Core Strategy (adopted December 2010):

- Policy CS1 – St Edmundsbury Spatial Strategy
- Policy CS2 – Sustainable Development
- Policy CS3 – Design and Local Distinctiveness
- Policy CS7 – Sustainable Transport
- Policy CS8 – Strategic Transport Improvements
- Policy CS9 – Employment and the Local Economy
- Policy CS14 – Community Infrastructure Capacity and Tariffs

31. St Edmundsbury Borough Council Local Plan Policies Map (adopted February 2015) – Bury St Edmunds Inset Map 1

Other planning policy:

32. The NPPF was revised in July 2021 and is a material consideration in decision making from the day of its publication. Paragraph 219 is clear however, that existing policies should not be considered out-of-date simply because they were adopted or made prior to the publication of the revised NPPF. Due weight should be given to them according to their degree of consistency with the Framework; the closer the policies in the plan to the policies in the Framework; the greater weight that may be given. The policies set out within the Joint Development Management Policies have been assessed in detail and are considered sufficiently aligned with the provision of the 2021 NPPF that full weight can be attached to them in the decision-making process.

- National Planning Practice Guidance
- Concept Statement Suffolk Business Park Extension Adopted October 2007
- Suffolk Business Park Extension Masterplan Adopted June 2010
- St Edmundsbury Green Infrastructure Strategy Dated September 2009

Officer comment:

33. The issues to be considered in the determination of this application are:

- Principle of Development
- Design and Appearance
- Energy Considerations
- Landscape and Ecology
- Sustainable Transport and Highway Matters
- Other Matters

Principle of Development

34. The application seeks planning permission for an Ambulance Depot (Sui Generis), fleet depot (Class E(g), previously B1(c)) with associated parking and landscaping. Operational works within the depot include the maintenance and repair of fleet vehicles via an integral workshop, a make ready area which will clean out and replenish the medical provisions in the ambulances, offices, storage areas, changing rooms, and training rooms. The overall use is defined as a Sui Generis use (use class of its own) and as such does not accord to the uses allocated for the Suffolk Business Park. In short, the Suffolk Business Park is allocated for B1 and B8 use.
35. BV14 states "Development at Suffolk Business Park will comprise the following:
 - a) light industrial, research and office use (B1, and B8 uses);
 - b) units for new and small firms involved in high technology and related activities; and
 - c) extensive landscaping, particularly around the perimeter of the site
36. For clarity, the B8 use class remains in place, with B1 use class now incorporated into Class E.
37. Paragraph 11 of the NPPF (as well as policy DM1 and BV1) states that plans and decisions should apply a presumption in favour of sustainable development. For decision taking, development proposals that accord with an up-to-date development plan should be approved without delay. Conversely therefore, development not in accordance with the development plan should be refused unless material considerations indicate otherwise.
38. Policy CS1 outlines that the spatial strategy provides a framework for environmentally sustainable economic growth within the overall guidelines of the East of England Plan and the context of the Western Suffolk Sustainable Community Strategy.
39. Policies CS7 and CS8 state the Council will develop and promote a high quality and sustainable transport system across the borough and reduce the need for travel through spatial planning and design, as well as stating the Council will continue to work with relevant partners, including Suffolk County Council and the Highways Agency, and developers, to secure the necessary transport infrastructure.
40. Policy CS9 aims to provide sufficient employment to support the local economy and includes Suffolk business park to enable the delivery of additional jobs in a sustainable location.
41. Policy DM3 requires proposals for development of sites subject to Masterplans will be permitted only where proposals accord with Policy DM2 and with any relevant design guidance, Concept Statements, and Development Briefs approved by the Local Planning Authority or other adopted Supplementary Planning Documents.
42. The application refers to the development of the plot for employment use for the maintenance and administrative centre for ambulance fleet vehicles, which given the use does not fall comfortably within any use class, determines it to be considered as Sui Generis.

43. The application site lies within an extension to Suffolk Business Park, described as an 'Enterprise Zone' for business, distribution and industrial units. Whilst the site was clearly earmarked within the adopted masterplan for the aforementioned uses, it was referring to the St Edmundsbury Local Plan, 2016 which is now superseded by the current local plan. Policy BV13 refers only to B1 or B8 uses, as such, the proposal represents a departure from the development plan as the proposed use is not a B1 or B8 use. The masterplan is however adopted and therefore still valid and carries weight as a material consideration.
44. The proposal would fail to deliver employment uses which fall within classes B1 or B8, on a strategic employment site and the proposal is therefore contrary to policies BV13 and CS9. The proposal would instead provide employment uses via the provision of an Ambulance Hub to be utilised by the National Health Service. It therefore must be concluded that the principle of development is contrary to these policies within the development plan.
45. Given the function of the building proposed, its location observed in context with the A14 and junctions 44 and 45, as well as the obvious administrative benefits to having an Ambulance Hub of this nature in this location, the proposal is considered to be supportable, subject to other material planning considerations discussed below.
46. Whilst the application is essentially a resubmission with modest changes of a previous, Sui Generis approval (ref. DC/19/0042/FUL), this is not to say that a precedent has been set, not least noting that the previous permission has now expired. However, parallels can be drawn from the previous permission. In any event, the LPA are assessing the application on its own merits. These exceptional circumstances are acknowledged within the supporting Planning Statement at paragraphs 1.3 and 1.4, stating:
- *Due to the nature of this proposal, it is not covered by this consent or the main planning policy for the site which seeks B1 and B8 use, therefore there is a need for the applicant to demonstrate that there are exceptional circumstances that would enable the local planning authority to consider them as material considerations that would allow it to approve the application as a departure from the adopted policy.*
 - *These exceptional circumstances were previously demonstrated and agreed by the Local Planning Authority (LPA) under planning consent DC/19/0042/FUL. These exceptional circumstances have not changed because of this revised submission.*
47. Previously, officers argued that the public benefit of the use should be given significant weight as the service provided is essential to society and the wider health service. This is a notion that is echoed within this assessment.
48. Therefore, the acceptability of the proposal as a whole will be critically assessed within this report, with a conclusion weighing up the planning balance.

Design and Appearance

49. The Suffolk Business Park Extension is intended to be a high-quality business park, which is a clear instruction of the adopted Masterplan. To achieve a high-quality business park both the design of buildings and landscaping are equally important. Furthermore, the NPPF advocates the importance of good design and this is echoed through policies CS3 and DM2 of the development plan. Collectively, these policies, including the masterplan, require proposals to respect their surroundings and present as well designed additions which respond intelligently to their context.
50. Similarly, to that approved under DC/19/0042/FUL, the building comprises two key elements, which join to form an inverted 'L' built form. However, the orientation and layout has been altered since the previous approval. The ambulance station would be located to the north along an east-west alignment, and the fleet depot to the east side of the building leading through from the north to south of the building. The building will be set centrally within the site to enable movement of the vehicles around the building.
51. The building will be two storey in scale, with the western elevation offering some articulation in the form of varying pitches meeting at a central point with a maximum height of approximately 11 metres to ridge height. This has increased from the previously approved 7.625m maximum height. The taller, two storey elements will be focused on the northern and southern boundaries of the site, with the decreasing heights meeting and visible upon approach to the site from the north-west. Given the location of the building, introduction of varying roof heights and mixed use of materials, fenestration arrangements and colour palette, the overall height of the building is considered to be sympathetic to the locality and acceptable.
52. Therefore, given the above in combination with the design and appearance of the building, officers are satisfied that the design of the building is acceptable and will positively contribute to the appearance of a high quality business park.

Energy Considerations

53. The applicant has provided an Energy Statement, as well as a BREEAM Pre-Assessment to outline the use of materials, energy performance and environmental goals for the building.
54. Policy DM7 states that all new non-residential developments over 1000 square metres will be required to achieve the BREEAM Excellent standard or equivalent unless it can be demonstrated that one or more of the following conditions apply:
- It is not possible to meet one or more of the mandatory credits for an Excellent rating due to constraints inherent within the site. In this case development will be expected to accrue the equivalent number of credits by targeting other issues while achieving an overall Very Good rating.
 - The cost of achieving an Excellent rating can be demonstrated to compromise the viability of the development. In this case applicants will be expected to agree with the Council whether the target should be

relaxed, or whether cost savings could be achieved in another aspect of the development.

55.As per paragraphs 4.4 and 4.5 of the Planning Statement, the ground floor comprises 1,795sqm GIA ambulance station with make ready parking for 3 ambulances with various offices, workshop spaces crew room and facilities, together with a fleet depot comprising workshop space for 4 ambulances and other workshop space and ancillary office and storage rooms. The first floor comprises 1,110sqm of ambulance station space for training rooms and offices, including 469sqm of expansion space. As per the Application Form, the total gross internal floor area equates to 3,071sqm, up from 2657sqm from the previous approval, therefore exceeding the aforementioned threshold.

56.As per the Energy Statement, the development has been designed to incorporate several sustainability measures to address the aims and objectives established so that an intrinsically sustainable building is delivered. BREEAM Excellent requires a rating of 70%, typically accompanied with a request by the LPA's Environment Team: Sustainability Officer to include a 5% buffer, therefore 75%, to ensure that the Excellent rating can still be met in the event some credits are lost during the construction phase. The submitted BREEAM Pre-Assessment illustrates a 77.99% rating, therefore achieving the standard identified by Policy DM7. In this respect, the proposal is seen to accord with the provisions of DM7 in its entirety.

Landscape and Ecology

57.Policy BV13 states in part that amongst other things, *the design and landscaping have been informed by a masterplan for the site.* The Suffolk Business Park Extension Masterplan was adopted in June 2010. Landscaping and ecology is dealt with in chapter 5. This states that *the landscape objectives for the site are to retain where possible the existing landscape features which make a positive contribution to the appearance of the area, and to enhance the site with extensive new planting. Therefore, the principal trees and hedgerows will be substantially retained and will be incorporated into the structure of Suffolk Park Extension.* The masterplan goes on to state that, *within plots, planting will be used to soften frontages and provide some enclosure of vehicle parking and manoeuvring areas appropriate to the use. A landscaping strategy will be formulated to ensure consistency in the nature of the planting and in the species used. Native species will be used where possible. This will ensure that landscape is an integral part of plot design and result in a consistent appearance throughout the development.*

58.Policy DM2(g) states proposals for all development should, as appropriate, taking mitigation measures into account not adversely affect important landscape characteristics and prominent topographical features as well as sites, habitats, species and features of ecological interest. This is further echoed in the same policy with proposals needing to recognise and address the key features, characteristics, landscape/townscape character, local distinctiveness and special qualities of the area and/or building and, where necessary, prepare a landscape/townscape character appraisal to demonstrate this.

59.Policy DM11 seeks to prevent development that would have an adverse effect on protected species. The application submission contains an

Ecological Survey, as well as Landscape Management Plan. Section 40 of the Natural Environment and Rural Communities (NERC) Act 2006 states that:

60. "Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity."
61. The Duty applies to all public authorities in England and Wales, including all local authorities. Conserving biodiversity includes restoring and enhancing species and populations and habitats, as well as protecting them.
62. The National Planning Policy Framework (NPPF, 2021) states that "the planning system should contribute to and enhance the natural and local environment by... protecting and enhancing ...sites of biodiversity or geological value..." and "minimising impacts on and providing net gains for biodiversity ..." (paragraph 174).
63. Policy DM12, in addition to the requirements of DM11, requires measures to be included, as necessary and where appropriate, in the design for all developments for the protection of biodiversity and the mitigation of any adverse impacts. Policy DM13 of the Joint Development Management Policies document requires that development will be permitted where it will not have an unacceptable adverse impact on the character of the landscape, landscape features, wildlife, or amenity value. The policy goes on to note the sensitivity of the Special Landscape Areas and requires that individual proposals within or adjacent to these areas will be assessed based on their specific landscape and visual impact. Policy DM13 also requires that all development proposals should demonstrate that their location, scale, design and materials will protect, and where possible enhance the character of the landscape, including the setting of settlements, the significance of gaps between them and the nocturnal character of the landscape. Finally, the policy advises that where any harm will not significantly and demonstrably outweigh the benefit of the proposal, development will be permitted subject to other planning considerations. However, the policy also requires that it is essential that commensurate provision must be made for landscape mitigation and compensation measures, so that harm to the locally distinctive character is minimised and there is no net loss of characteristic features.
64. The site layouts and finer technical details attributed to the proposal have been discussed with Landscaping and Ecological consultant throughout the consideration of the application. However, the majority of the landscaping proposed, and ecological matters have remained consistent. The landscaping primarily consists of strips of hedging within integrated trees of various species on the southern, western, eastern and northern site boundaries, with internal landscaping to the car parks. An existing 30-metre landscaping buffer on the southern boundary will be left unaffected by the proposal. Following extensive discussions with the landscaping consultant, although it is acknowledged that the inclusion of further trees and soft landscaping within the car parks could be improved to soften the appearance and approach to the depot, when considering the wider site landscaping, the proposed landscaping is considered acceptable. The existing and proposed boundary landscaping will frame and set the building appropriately and as such it is considered that the scheme accords with the adopted Masterplan for the Park and is therefore acceptable.

65. With reference to the Ecological context of the proposal, the Ecological Consultant is satisfied that there is sufficient ecological information available for determination of this application. This provides certainty for the LPA of the likely impacts on designated sites, protected and Priority species & habitats and, with appropriate mitigation measures secured, the development can be made acceptable. The mitigation measures identified in the Walkover Ecology Survey Report (James Blake Associates, September 2022) have been secured by a condition and will therefore be implemented in full. This is necessary to conserve and enhance protected and Priority species particularly nesting birds and badger.
66. The Walkover Ecology Survey Report (James Blake Associates, September 2022) reports that, due to the abundance of suitable foraging and sett creation habitats on site, if ground works do not take place within six months of the survey, then an updated badger check should take place to ensure badgers have not started using the site in this interim period. This has been added as an informative in agreement with Place Services Ecology, noting the 6-month period has now lapsed. However, it is understood that this report is being commissioned by the applicant to avoid further delays in proceeding with the project, in the event the application is approved. Having received lighting specification, the removal of this previously proposed wildlife sensitive lighting scheme condition has occurred.
67. Overall, the proposal is considered to sufficiently comply with the provisions of Policies DM2, DM11, DM12, DM13, BV13 and the relevant paragraphs of the NPPF.

Sustainable Transport and Highway Matters

68. Policy CS14 requires all new proposals for development will be required to demonstrate that the necessary on and off-site infrastructure capacity required to support the development and to mitigate the impact of it on existing infrastructure exists or will exist prior to that development being occupied.
69. Policy DM45 states for major development and/or where a proposal is likely to have significant transport implications, the Council requires the applicant to submit the following documents alongside their planning applications:
- a. a Transport Assessment appropriate to the scale of development and the likely extent of transport implications;
 - b. a Travel Plan that identifies the physical and management measures necessary to address the transport implications arising from development.
70. Policy DM46 states the authority will seek to reduce over-reliance on the car and to promote more sustainable forms of transport and for proposals to accord with Suffolk Parking Guidance.
71. Policy BV13 requires a Travel Plan to be implemented to reduce dependency on the motor vehicle. It is Officers' understanding, as per the previous approval DC/19/0042/FUL, that having discussed this with officers at Suffolk County Council who oversee Public Transport Operations and Travel Plans it was agreed that the requirement for a Travel Plan and contributions towards a bus service would not be sought unless in exceptional circumstances. This

decision was taken by the LPA when determining the outline application DC/16/2825/OUT.

72. To replace this approach West Suffolk Council has been requiring facilities are installed in all new premises on the Suffolk Business Park Extension that allow for staff to walk and cycle to work. Such facilities will include separate male and female changing rooms, with lockers that can accommodate wash kit, a suit or other work wear, drying rooms to dry wet clothes, and multiple shower cubicles.
73. The outline consent DC/16/2825/OUT required a cycling and walking strategy to be drawn up and approved by the Local Planning Authority. Whilst this application is not a reserved matter application that is bound by the parameters set by the outline, officers considered what would have been required by the strategy and how this proposal compared to those requirements.
74. With specific reference to this application, all of the aforementioned facilities are provided on the ground floor of the building, with gender neutral facilities inclusive. Whilst this does not specifically accord with the intended male and female facilities, given the allocation of lockers, changing facilities, WCs and showers at the site and encouragement for users to travel sustainably to the site, this is considered appropriate mitigation.
75. As previously stated, the internal floor area of the building equates to 3,071sqm. The Suffolk Parking Standards do not have parking standards for the proposed Sui Generis use. The proposal includes parking for 37 ambulance/rapid response vehicles, of which 19 would provide Electric Vehicle (EV) charging. The proposal also includes 143 car parking spaces for staff and visitors, including 8 disabled and 10 EV spaces. A further 40 cycle parking spaces will be provided onsite, with 8 visitor spaces adjacent the north-western main building lobby and 32 staff cycle spaces located to the rear of the building in a covered, well monitored area. A further 8 motorcycle parking spaces are also provided on the south-western edge of the site.
76. Suffolk County Council Highway Authority has raised no objections to the provision of parking spaces and are aware that in the past on the Moreton Hall area uses have come forward which have not had sufficient parking on site which has led to parking on the highway network. This is a matter also raised by the National Highways. Given the unusual nature of the proposal and the shift pattern of many of the staff National Highways required additional information from the applicant / operator to understand staff numbers, parking on site at existing facilities and how future demands / staff increases had been planned for. A Transport Assessment Addendum was submitted which set out to demonstrate the acceptability of the scheme and how the amount of parking on site was acceptable. This has been accepted by National Highways who are satisfied with the scheme. National Highways had requested further information related to the aforementioned trips the proposed development would generate on the Strategic Road Network junctions in the AM and PM peaks. This information was subsequently submitted. Based on the new information provided within the Highway Impact Technical Note, National Highways are content with the proposed traffic distribution and associated trips in the AM and PM peaks generated by the proposed development (Junction 44 –18 two-way trips in

the AM and 21 two-way trips in the PM, Junction 45 – 7 two-way trips in the AM and PM), which will result in minimal impact during the network weekday peak hours and resulting in no material impact on the SRN junctions within the vicinity of the proposed development.

77. St Edmundsbury Core Strategy Policy CS2, Sustainable Development, requires the conserving and, wherever possible, enhancing of natural resources including, air quality. Policy DM14 of the Joint Development Management Policies Document states that proposals for all new developments should minimise all emissions and ensure no deterioration to either air or water quality.
78. Section 3.4.2 of the Suffolk Parking Standards states that "Commercial developments must provide suitable charging systems for a number of the parking spaces, with ducting and infrastructure in place to install additional charging systems when future demand dictates." For business uses the Suffolk guidance requires 20% of spaces to be equipped with charging systems with a minimum of 7.4Kw charging speed.
79. The Environment Team are content with the provision of EV charging points and have agreed to an appropriately worded condition (below) that states prior to first operational use of the site, at least 20 (twenty) car parking spaces shall be equipped with working electric vehicle charge points, which shall be provided for staff and/or visitor use at locations reasonably accessible from car parking spaces and shall be retained thereafter and maintained in an operational condition.
80. The proposal is therefore considered to comply with the provisions of policies CS2, CS14, DM2, DM14, DM45 and DM46 and BV13.

Other Matters

81. Policy DM6 states proposals for all new development will be required to submit schemes appropriate to the scale of the proposal detailing how on-site drainage will be managed so as not to cause or exacerbate flooding elsewhere.
82. The application has been accompanied by a Sustainable Drainage Assessment, site specific flood risk assessment and outline drainage strategy. Having engaged in extensive discussions with the Lead Local Flood Authority, no objections are raised regarding the proposal, subject to the imposition of conditions requiring a strategy for surface water disposal and subsequent implementation, submission of surface water drainage report and submission of a Construction Surface Water Management Plan. The proposal therefore accords with Policy DM6.
83. Policy DM20 states development will not be acceptable if it would have a material adverse effect on Scheduled Ancient Monuments or other sites of archaeological importance, or their settings.
84. As confirmed by Suffolk Archaeology, the application area has already been subjected to an archaeological evaluation and no further archaeological work or mitigation is required. No adverse archaeological impacts are therefore considered to arise and the proposal accords with Policy DM20.

Conclusion:

The application site lies within the Suffolk Business Park which is an allocated employment site under policy BV13 of the Bury St Edmunds Vision Document. BV13 sets out that B1 and B8 uses are acceptable in principle. The proposed use, being an Ambulance Hub, falls under sui generis use class. As such the proposal fails to accord with policy BV13 and represents a departure from the development plan. However, the function that the use will fulfil and the public benefit that it will bring are considered to carry significant positive weight.

85. As assessed within this report it is not considered the proposal would have a detrimental impact upon the form and character of the locality, ecology, archaeology or highway safety. In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004 and paragraph 12 of the NPPF, the development plan is the starting point for decision making and proposals that conflict with the development plan should be refused unless other material considerations indicate otherwise. It is clear that the proposal fails to accord with policy BV13 as the proposed development is not for B1 or B8 uses and this therefore weighs against the proposal. As set out within this report it is considered that significant weight can be attached to the proposed use, given the public benefit attributed to it. Suitable landscaping is proposed to help screen and mitigate the visual impact of the proposal. The site is in an easily accessible location, with links for cycling and pedestrian access. Having regard to all relevant material planning considerations the proposal is considered on balance to be acceptable.

Recommendation:

86. It is recommended that planning permission be **APPROVED** subject to the following conditions:

1. The development hereby permitted shall be begun not later than 3 years from the date of this permission.

Reason: In accordance with Section 91 of the Town and Country Planning Act 1990.

2. The development hereby permitted shall not be carried out except in complete accordance with the details shown on the following approved plans and documents:

- Application Form
- Planning Statement - 11074 rev B
- Flood Risk Assessment - 49498
- Flood Risk SUDs Assessment - 49498 - January 2019 Rev A
- Land Contamination Assessment - 48273 - October 2017
- Land Contamination Assessment – Site August 2021 - DGWD/21.217
- Land Contamination Appendices A-E - 48273 - October 2017
- Land Contamination Appendices F-H - 48273 - October 2017
- Landscape Management Plan – Indigo - September 2022
- Ecological Survey - JBA 18/298 ECO03 SR
- Badger Technical Note - JBA 18/298 ECO06 (Sensitive Information)
- Arboricultural Assessment
- Ground Gas Monitoring Report - KB/48273

- Transport Assessment - MAYER BROWN SEPTEMBER 2022 - FINAL 01
- Highways Impact Technical Note – Apr-23 – Final 01
- Design and Access Statement - 21712 - 8005 - 01
- Design & Access Statement Continued - 21712 - 8005 October 2022
- Noise Impact Assessment - 10251.1 Revision A
- Energy Statement - ESC1887
- BREEAM Pre-Assessment - ESS0373 REV B
- Amended – Lighting Product Data Sheet
- Amended – External Lighting Layout - 1830-ESC-00-ZZ-DR-E-2100
- Exploratory Hole Location Plan - 48273/G/FIG02
- Outline Drainage Strategy - CWA-22-100-SK530
- External Site Levels - CWA-22-100-515
- External Work Details - 21712-6003
- Roof Canopy Details - 21712-6001
- Bin Store Details - 21712-6002
- Roof Plan – Proposed - 21712-1004 P01
- Location Plan - 21712-1000
- Proposed Ground Floor Plan - 21712-1002
- Proposed First Floor Plan - 21712-1003
- Amended – Proposed Site Plan - 21712-2011-P02
- Amended – Proposed Elevations 1 - 21712-2151-P02
- Amended – Proposed Elevations 2 - 21712-2152-P02
- Amended – Sustainable Drainage Assessment - CWA-22-100-SUD-001 REV 3
- Amended – Proposed Site Plan (Planting) - 21712-2011-T02
- Amended – Proposed Planting Plan 1 - 1042-SW-01 REVB
- Amended – Proposed Planting Plan 2 - 1042-SW-02 REVB

Reason: To define the scope and extent of this permission.

3. The development shall achieve BREEAM Excellent standard. This must be evidenced by a BREEAM fully-fitted certificate upon completion. The development shall achieve a Final BREEAM Excellent rating in accordance with the requirements of the relevant BREEAM scheme. The projects Final Certificate must be issued to the local planning authority within a maximum of 6 months post completion.

Reason: In the interests of sustainability as required in policy DM7 of the Joint Development Management Policy Document 2015.

4. No development shall commence until details of the strategy for the disposal of surface water on the site have been submitted to and approved in writing by the local planning authority (LPA). The strategy shall be implemented and thereafter managed and maintained in accordance with the approved details.

Reason: To ensure clear arrangements are in place for ongoing operation and maintenance of the disposal of water drainage, in accordance with policy DM6 of the West Suffolk Joint Development Management Policies Document 2015, Chapter 14 of the National Planning Policy Framework and all relevant Core Strategy Policies. The condition is pre-commencement as it may require the installation of below ground infrastructure and details should be secured prior to any ground disturbance taking place.

5. Within 28 days of practical completion of the last dwelling or unit, surface water drainage verification report shall be submitted to the Local Planning Authority, detailing and verifying that the surface water drainage system has been inspected and has been built and functions in accordance with the approved designs and drawings. The report shall include details of all SuDS components and piped networks in an agreed form, for inclusion on the Lead Local Flood Authority's Flood Risk Asset Register.

Reason: To protect and prevent the pollution of controlled waters, future end users of the land, neighbouring land, property and ecological systems from potential pollutants associated with current and previous land uses in accordance with policy DM14 of the West Suffolk Joint Development Management Policies Document 2015, paragraphs 170,178 and 179 of the National Planning Policy Framework (NPPF), Environment Agency Groundwater Protection: Principles and Practice (GP3) and all relevant Core Strategy Policies.

6. Prior to commencement of development details of a Construction Surface Water Management Plan (CSWMP) detailing how surface water and storm water will be managed on the site during construction (including demolition and site clearance operations) shall be submitted to and agreed in writing by the Local Planning Authority. The CSWMP shall be implemented and thereafter managed and maintained in accordance with the approved plan for the duration of construction. The approved CSWMP and shall include:

A. Method statements, scaled and dimensioned plans and drawings detailing surface water management proposals to include:-

1. Temporary drainage systems
2. Measures for managing pollution / water quality and protecting controlled waters and watercourses
3. Measures for managing any on or offsite flood risk associated with construction.

Reason: To ensure the development does not cause increased flood risk, or pollution of watercourses in line with the River Basin Management Plan, in accordance with policies DM6 and DM14 of the West Suffolk Joint Development Management Policies Document 2015, Chapters 14 and 15 of the National Planning Policy Framework and all relevant Core Strategy Policies.

7. If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until the developer has submitted a remediation strategy to the Local Planning Authority detailing how this unsuspected contamination shall be dealt with and obtained written approval from the Local Planning Authority. The remediation strategy shall be implemented as approved.

Reason: To protect and prevent the pollution of controlled waters, future end users of the land, neighbouring land, property and ecological systems from potential pollutants associated with current and previous land uses in

accordance with policy DM14 of the West Suffolk Joint Development Management Policies Document 2015, paragraphs 170,178 and 179 of the National Planning Policy Framework (NPPF), Environment Agency Groundwater Protection: Principles and Practice (GP3) and all relevant Core Strategy Policies.

8. The areas to be provided for the storage and presentation for collection/emptying of refuse and recycling bins as shown on Drawing No. 21712-2011-P02 shall be provided in their entirety before the development is brought into use and shall be retained thereafter for no other purpose.

Reason: To ensure the incorporation of waste storage and recycling arrangements, in accordance with policies DM2 and DM14 of the West Suffolk Joint Development Management Policies Document 2015, Chapters 12 and 15 of the National Planning Policy Framework and all relevant Core Strategy Policies.

9. The use shall not commence until the areas within the site shown on Drawing No. 21712-2011-P02 for the purposes of loading, unloading, manoeuvring and parking of vehicles has been provided and thereafter the areas shall be retained, maintained and used for no other purposes.

Reason: To ensure that sufficient space for the on-site parking of vehicles is provided, in accordance with policy DM2 and DM46 of the West Suffolk Joint Development Management Policies Document 2015, Chapter 9 of the National Planning Policy Framework and all relevant Core Strategy Policies.

10. The use shall not commence until the facilities within the site shown on Drawing No. 21712-2011-P02 for the purposes of cycle parking have been provided and thereafter the area shall be retained, maintained and used for no other purposes.

Reason: To ensure that sufficient space for the on-site parking of vehicles is provided, in accordance with policy DM2 and DM46 of the West Suffolk Joint Development Management Policies Document 2015, Chapters 9 and 12 of the National Planning Policy Framework and all relevant Core Strategy Policies.

11. Prior to first operational use of the site, at least 20 (twenty) car parking spaces shall be equipped with working electric vehicle charge points, which shall be provided for staff and/or visitor use at locations reasonably accessible from car parking spaces. The Electric Vehicle Charge Points shall be retained thereafter and maintained in an operational condition.

Reason: To promote and facilitate the uptake of electric vehicles on the site in order to minimise emissions and ensure no deterioration to the local air quality, in accordance with Policy DM14 of the Joint Development Management Policies Document, paragraphs 107 and 112 of the National Planning Policy Framework (NPPF) and the Suffolk Parking Standards.

12. All mitigation and enhancement measures and/or works shall be carried out in accordance with the details contained in the Walkover Ecology Survey Report (James Blake Associates, September 2022) as already

submitted with the planning application and agreed in principle with the local planning authority prior to determination.

Reason: To secure biodiversity enhancements commensurate with the scale of the development, in accordance with policy DM12 of the West Suffolk Joint Development Management Policies Document 2015, Chapter 15 of the National Planning Policy Framework and all relevant Core Strategy Policies.

13. Prior to any works above slab level, A Biodiversity Enhancement Strategy for protected and Priority species shall be submitted to and approved in writing by the local planning authority. The content of the Biodiversity Enhancement Strategy shall include the following:

- a) Purpose and conservation objectives for the proposed enhancement measures;
- b) detailed designs or product descriptions to achieve stated objectives;
- c) locations, orientations, and heights of proposed enhancement measures by appropriate maps and plans;
- d) persons responsible for implementing the enhancement measures;
- e) details of initial aftercare and long-term maintenance (where relevant).

The works shall be implemented in accordance with the approved details prior to occupation and shall be retained in that manner thereafter.

Reason: To secure biodiversity enhancements commensurate with the scale of the development, in accordance with policies DM11 and DM12 of the West Suffolk Joint Development Management Policies Document 2015, Chapter 15 of the National Planning Policy Framework and all relevant Core Strategy Policies.

14. All planting comprised in the approved details of landscaping (1042-SW-01 REV B and 1042-SW-02 REV B) shall be carried out in the first planting season following the commencement of the development (or within such extended period as may first be agreed in writing with the Local Planning Authority). Any planting removed, dying or becoming seriously damaged or diseased within five years of planting shall be replaced within the first available planting season thereafter with planting of similar size and species unless the Local Planning Authority gives written consent for any variation.

Reason: To enhance the appearance of the development and ensure a satisfactory environment, in accordance with policies DM2, DM12 and DM13 of the West Suffolk Joint Development Management Policies Document 2015, Chapters 12 and 15 of the National Planning Policy Framework and all relevant Core Strategy Policies.

15. No development above ground level shall take place until details of a hard landscaping scheme for the site have been submitted to and approved in writing by the Local Planning Authority. These details shall include proposed finished levels and contours showing earthworks and mounding; surfacing materials; means of enclosure; car parking layouts; other vehicle and pedestrian access and circulations areas; hard surfacing materials; minor artefacts and structures (for example furniture, play equipment, refuse and/or other storage units, signs, lighting and similar features);

proposed and existing functional services above and below ground (for example drainage, power, communications cables and pipelines, indicating lines, manholes, supports and other technical features); retained historic landscape features and proposals for restoration where relevant. The scheme shall be implemented prior to the occupation of any part of the development (or within such extended period as may first be agreed in writing with the Local Planning Authority).

Reason: To assimilate the development into its surroundings and protect the character and appearance of the area, in accordance with policies DM2 and DM13 of the West Suffolk Joint Development Management Policies Document 2015, Chapters 12 and 15 of the National Planning Policy Framework and all relevant Core Strategy Policies.

16. Prior to commencement of development, including any works of demolition, a Construction Method Statement shall be submitted to, and approved in writing by, the Local Planning Authority. The approved Statement shall be adhered to throughout the construction period. The Statement shall provide for:
- A. The parking of vehicles of site operatives and visitors
 - B. Loading and unloading of plant and materials
 - C. Site set-up including arrangements for the storage of plant and materials used in constructing the development and the provision of temporary offices, plant and machinery
 - D. The erection and maintenance of security hoarding including external safety and information signage, interpretation boards, decorative displays and facilities for public viewing, where appropriate
 - E. Wheel washing facilities
 - F. Measures to control the emission of dust and dirt during construction
 - G. A scheme for recycling/disposing of waste resulting from demolition and construction works
 - H. Hours of construction operations including times for deliveries and the removal of excavated materials and waste
 - I. Noise method statements and noise levels for each construction activity including piling and excavation operations
 - J. Access and protection measures around the construction site for pedestrians, cyclists and other road users including arrangements for diversions during the construction period and for the provision of associated directional signage relating thereto.

Reason: To ensure the satisfactory development of the site and to protect the amenity of occupiers of adjacent properties from noise and disturbance, in accordance with policies DM2 and DM14 of the West Suffolk Joint Development Management Policies Document 2015, Chapter 15 of the National Planning Policy Framework and all relevant Core Strategy Policies. This condition requires matters to be agreed prior to commencement to ensure that appropriate arrangements are put into place before any works take place on site that are likely to impact the area and nearby occupiers.

17. All HGV and construction traffic movements to and from the site over the duration of the construction period shall be subject to a Construction and Deliveries Management Plan which shall be submitted to the planning

authority for approval a minimum of 28 days before any deliveries of materials commence.

No HGV movements shall be permitted to and from the site other than in accordance with the routes defined in the Plan.

Reason: To reduce and / or remove as far as is reasonably possible the effects of HGV and construction traffic in sensitive areas, in the interest of highway safety, in accordance with policy DM2 of the West Suffolk Joint Development Management Policies Document 2015, Chapter 9 of the National Planning Policy Framework and all relevant Core Strategy Policies.

18. The site preparation and construction works, shall only be carried out between the hours of:

08:00 to 18:00 Mondays to Fridays
08:00 - 13.30 Saturdays

No times during Sundays or Bank Holidays without the prior written consent of the Local Planning Authority.

(If 'quiet work activities' are permitted by the Local Planning Authority upon receiving a formal request outside these hours they will not involve the use of generators, machinery and vehicles in external areas of the site).

Reason: To protect the amenity of occupiers of adjacent properties from noise and disturbance, in accordance with policies DM2 and DM14 of the West Suffolk Joint Development Management Policies Document 2015, Chapter 15 of the National Planning Policy Framework and all relevant Core Strategy Policies.

19. Within 1 month of development commencing on the hereby approved building full details of the lockers, drying room (including heating source and how clothes and other items will be stored (rails/ hook/ benches)) shall be submitted to and approved in writing with the Local Planning Authority. The approved details shall be fully installed and available to staff before the building hereby approved is first brought into operation and thereafter retained.

Reason: To ensure that the facilities to allow staff to cycle and walk to work are installed and available as mitigation for the scheme not having a Travel Plan or making a public transport contribution.

Documents:

All background documents including application forms, drawings and other supporting documentation relating to this application can be viewed online [DC/22/1953/FUL](https://www.suffolk.gov.uk/DC/22/1953/FUL)