

TITLE: 25/00371/FUL

Committee: Planning Committee

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Author: Planning Officer

Report No: AA114

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Site Address: Land Off Water Lane Long Acre Kirtling Suffolk

Proposal: To build a purpose-built Wildlife Veterinary Hospital including residential facilities

Applicant: Sue Stuble

Parish: Kirtling

Ward: Woodditton

Ward Councillor/s: James Lay
Alan Sharp

Date Received: 23 April 2025

Expiry Date: 16 January 2025

1.0 RECOMMENDATION

1.1 Members are recommended to REFUSE the application for the following reasons:

1. Policy GROWTH 2 states that outside of the development envelopes, development will be strictly controlled, having regard to the need to protect the countryside and the setting of towns and villages. Development will be restricted to the main categories listed in the policy, and may be permitted as an exception, providing there is no significant adverse impact on the character of the countryside and that other Local Plan policies are satisfied. The proposal does not fall within any of the exception policies listed in GROWTH 2 and therefore would be unacceptable in principle. There is insufficient justification as to why the proposed development needs to be in this specific location or why someone needs to live on site. The proposal is therefore considered to be

contrary to GROWTH 2 of the East Cambridgeshire Local Plan, 2015 (as amended) and Chapter 2 of the National Planning Policy Framework (2024).

2. Policy ENV 1 of the East Cambridgeshire Local Plan, 2015 states that development proposals should ensure that they provide a complementary relationship with the existing development and conserve, preserve and where possible enhance the distinctive and traditional landscapes and key views in and out of settlements. Policy ENV 2 states that development proposals ensure that the location, layout, massing, materials and colour of buildings relate sympathetically to the surrounding area. The proposal would result in a large amount of development projecting into the countryside against the general pattern of development in the area. The proposal would result in significant harm to the character and appearance of the area by virtue of the scale of the development proposed and is therefore contrary to Policies ENV 1 and ENV 2 of the East Cambridgeshire Local Plan, 2015 (as amended) and Chapter 12 of the National Planning Policy Framework (2024)
3. Policy ENV 2 of the East Cambridgeshire Local Plan, 2015 states that new development will be expected to ensure that there is no significantly detrimental effect on the residential amenity of nearby occupiers and that occupiers and users of new buildings, especially dwellings, enjoy high standards of amenity. The proposal has the potential to result in noise and disturbance to the residential amenity of neighbouring dwellings, however, there is a lack of information submitted in respect of the use of solar panels with battery storage and air source heat pumps to make a full assessment of the impact of the proposal to residential amenity. The proposal is therefore contrary to Policy ENV 2 of the East Cambridgeshire Local Plan, 2015 (as amended) and Chapter 12 of the National Planning Policy Framework (2024)

1.2 The application was called in committee by Cllr Sharp and was heard at the meeting on 2nd July 2025. The application was deferred by members and a three-month period given to the applicants to allow an opportunity to address the five reasons for refusal. The applicant met that deadline and following a consultation period, the application is being brought back before the planning committee for consideration.

2.0 SUMMARY OF APPLICATION

2.1 The application seeks planning permission for a purpose-built wildlife hospital which includes residential facilities.

2.2 The full planning application, plans and documents submitted by the Applicant can be viewed online via East Cambridgeshire District Council's Public Access online service, via the following link [Simple Search](#).

3.0 PLANNING HISTORY

3.1 There is no planning history at this site.

4.0 THE SITE AND ITS ENVIRONMENT

The proposed wildlife hospital would be situated on a parcel of land along Water Lane and would occupy approximately 0.48ha (1.18 hectares) of the wider site. The site is outside of the development envelope of Kirtling and is therefore considered to be in the countryside. The site is accessed by a single-track road. There is a row of trees to the north of the site which provides some screening on approach. The wider site is surrounded by hedgerows; these are beyond the red line boundary of the site. To the east of the wider site is a Public Right of Way (Footpath 141/20). To the southwest of the site is a County Wildlife Site (CWS) and the verge along Water Lane is a protected road verge. At the time of the site visit (28th April 2025) and the subsequent committee site visit (2nd July 2025), the site contained storage containers, a static caravan and other paraphernalia such as hutches, which have been placed on the land without the benefit of planning permission. There have also been trees planted, and bee hives placed on the land, although all of this is outside of the red line boundary.

5.0 RESPONSES FROM CONSULTEES

5.1 Responses were received from the following consultees and these are summarised below. The full responses are available on the Council's web site. **Please note** the comments summarised below are from the consultation carried out following the submission of new information. The original consultee responses can be found on the Council's website.

East Cambs Ecologist – 9 December 2025

Ecology

From the information provided the Senior Ecologist has reviewed this application and, as of 21/11/25 supports this application with conditions and S106 agreement in place to secure significant BNG habitats and secure offsite measures for protected species.

There are some inconsistencies and minor issues, but these can be dealt with via discharge of condition (for example, not listing the location of bat boxes to meet NPPF section 15 and ENV7). Not all previous issues have been overcome at present and conditions will be required to ensure the council meets its biodiversity duty towards NERC Act 2006 species and meets its obligations under Section 17 of the Crime and Disorder Act 1998, where local authorities are required to do everything they reasonably can to prevent crime, including wildlife crime. A species release schedule would be required to ensure that no wild animal releases caused additional harm to local wildlife in order to conserve, restoring or otherwise enhance a population of a particular species.

BNG

With the updated information provided the Senior Ecologist approves the baseline conditions this application meets the minimum legal requirement for BNG for the current redline boundary and requires S106 to secure monitoring of the site.

Environmental Health - 10 October 2025

I note that the proposal involves battery storage and ASHPs which I had not previously commented on. These elements would fall under the control of the noise condition I recommended in my initial response and so I have no additional comments to make at this time

Local Highways Authority - 30 October 2025

Following a careful review of the documents provided to the Local Highway Authority as part of the above planning application, the effect of the proposed development upon the public highway would likely be mitigated if the following conditions form part of any permission that the Planning Authority is minded to issue in regard to this proposal.

Comments

The proposal seeks to introduce a new access point from Long Acre, Kirtling, to a purpose-built Wildlife Veterinary Hospital. The accompanying Transport Report outlines that the facility is expected to generate additional vehicle movements along Long Acre. This is due to the employment of approximately eight staff, onsite accommodation for the applicant, four treatment rooms and one intensive care room, as well as movements associated with veterinary personnel, a wildlife ambulance, visitors dropping off limited wildlife, and servicing activities related to the management and maintenance of the site, its facilities, equipment, and deliveries.

Long Acre is considered, at present, to be inadequate to serve the scale of the development proposed within this application by virtue of its restricted width, lack of passing places and the poor geometry and width of its junction with Woodditton Road. At present, this arrangement appears to be inadequate to facilitate two-way vehicular movements.

In order to make this development acceptable, the applicant should provide appropriate measures to mitigate the potential increased risk of highway safety issues as a result of the proposed intensification of Long Acre. These should include the provision of a passing bay along Long Acre, equidistant between the site and junction at Woodditton Road and the regularisation of the junction between Long Acre and Woodditton Road to enable two vehicles to pass in the junction without hinderance.

Whilst the intensification of use of the junction, based on the Transport Report provided, looks to be fairly modest, it is considered that these minor highway works are necessary to accommodate any intensification of use to ensure safe and suitable access can be made to the site. It is considered that, given the variety of vehicles such as visitors, deliveries and staff that will access the site via motor

vehicle, provision must be made to allow two-way vehicle movements to the site to prevent obstruction to the carriageway, verge damage or reversing manoeuvres onto Woodditton Road. The deficiencies present with the existing junction arrangement are evident from the overrun verges apparent. Without prejudice to any additional information and based on the records available to the County Council at present, it looks to be that adequate space is available within the extent of the public highway for the provision of these works. For the avoidance of doubt, it would be the preference of the LHA that any proposed highway works details are approved on a specific, separate plan prior to determination of decision.

It is also observed that the access width proposed within the site is slightly below that of which the Local Highway Authority (LHA) would consider acceptable for a development of this scale. It would be expected that this development would provide an access of at least 5 metres (16.4ft) wide for the first 8 metres (26.2ft) within the site, whereas a 4.5 metre (14.7ft) access has been proposed. There appears to be adequate space on site to create an access that is an appropriate width. Further, any proposed gate shall be 10 metres (32.8ft) back from the carriageway edge into the site.

Given the site context, consideration shall be given to the impact of the construction of the site to the public highway within the vicinity of the site. Temporary measures shall be proposed to prevent damage to the highway verges on either side of the carriageway by contractor motor vehicles and how any such damage will be repaired at no expense to the LHA.

It is observed that the parking provision provided on site may not be adequate for the scale of the development proposed, however this is something the LPA may wish to comment upon. Due to its restricted carriageway width, Long Acre is not a suitable location for any overspill parking and adequate parking provision shall be provided on site.

Should the applicant be willing to accept the conditions outlined, this development would be considered to be acceptable to the LHA.

The conditions requested are the submission of an engineering scheme for the improvement of Long Acre and the junction of Long Acre and Woodditton Road, the proposed vehicle access to be a minimum of 5 metres (16.4ft) in width for a minimum distance of 8 metres (26.2ft), any gates to be set back a minimum of 10 metres (32.8ft), the submission of a construction traffic management plan, that the access is constructed so its falls are levels are such so that no private water drains across or onto the public highway and that the vehicular access is constructed using a bound material for the first 5 metres (16.4ft).

Parish - 31 October 2025

At its meeting on 27th October 2025, Kirtling and Upend Parish Council considered the above planning application.

Councillors agreed that, in principle, the Parish Council has no objection to the concept of establishing a wildlife hospital. The Council recognises the potential community and environmental benefits such a facility may bring.

However, the Council expressed serious concerns regarding the financial viability of the proposed project and the likelihood of its successful completion. Councillors felt that, without clear and credible evidence of sustainable funding for both construction and ongoing operation, there remains a significant risk that the development may not be completed or maintained as intended.

The Council has also received a number of objections from local residents, raising the following issues:

1. The proposal lies outside the village envelope, with insufficient justification for the choice of site.
2. The development comprises 20 acres of Grade 2 high-quality agricultural land.
3. The development would increase noise and light pollution, causing lasting harm to the area's open rural character and dark skies.
4. The level of community support claimed appears to have been overstated by the applicant.
5. Concerns regarding potential future expansion and precedent.
6. Uncertainty over ownership and control in the event of the owner's demise.
7. Inadequate evidence has been provided on the following points:
 - Financial viability of the project
 - Expected traffic levels
 - Impact on local ecology
 - Scale and impact of proposed on-site utilities

For these reasons, while the Parish Council does not object in principle to the idea of a wildlife hospital, it requests that the Planning Authority carefully consider these concerns before determining the application.

In addition, the Council asks that the representations made by Ms Sue Stuble at the meeting on 27th October be taken into account, specifically:

1. A wildlife-only covenant would be placed on the site, also limiting residential use to a maximum of 1,000 square feet on the site as a whole.
2. All containers would be removed from the site within 18 months of work commencing.
3. The developer would, at all times, act with respect for the environment.

Ward Councillors - 10 October 2025

This application will need the Full Planning Committee to give their views.

Waste Strategy (ECDC) - 21 October 2025

Following the change of proposal title to include residential facilities, I have included the standard advice for primary residential properties. Please note that ECDC will only collect the waste from the residential property if it is the primary residence of the owner, if it is to be used to accommodate workers on overnight shifts then waste produced would be classed as commercial. All waste produced from the veterinary hospital will require a registered commercial waste collection as per the previous comments.

East Cambs District Council will not enter private property to collect waste or recycling, therefore it would be the responsibility of the owners/residents to take any sacks/bins to the public highway boundary on the relevant collection day and this should be made clear to any prospective purchasers in advance, this is especially the case where bins would need to be moved over long distances; the RECAP Waste Management Design Guide defines the maximum distance a resident should have to take a wheeled bin to the collection point as 30 metres (98.4ft) (assuming a level smooth surface).

Under Section 46 of The Environmental Protection Act 1990, East Cambridgeshire District Council as a Waste Collection Authority is permitted to make a charge for the provision (delivery and administration) of waste collection receptacles, this power being re-enforced in the Local Government Acts of 1972, 2000, and 2003, as well as the Localism Act of 2011.

The Ely Group Of Internal Drainage Board - No Comments Received

Enforcement Section - No Comments Received

Cambs Wildlife Trust - No Comments Received

ECDC Trees Team - No Comments Received

5.2 A site notice was displayed near the site on 10th October.

5.3 Neighbours – all addresses who were originally notified or commented as part of the first consultation were reconsulted. The responses received are summarised below. A full copy of the responses are available on the Council's website.

5 comments were received from neighbouring properties. All 5 are objections to the proposal for the following reasons:

The vast majority of comments are from non-residents, there will be much more appropriate locations in the County, concerns around funding, existing lane is too narrow and in poor condition, loss of Grade 2 agricultural land, conflicts with the Local Plan, a residential dwelling would result in permanent harm, a business operating 24/7 would significantly increase the number of vehicles, this is the wrong place to build the hospital, basic principles have not changed since the original submission, will have a significant and irreversible impact on the rural character of the area, building is sited in an exposed and prominent location, residential accommodation on site is unjustified.

1 objection was received from a Kirtling resident who is not a neighbour to the site:

The planning statement includes several contrived statements and is selective in the policies referred to, issues with the transport report, concerns about the intention for the wider site, concerns that conditions/restrictions would not be observed, does not address concerns about scale, the views of local residents should be given due weight and consideration.

32 comments were received from ECDC residents outside of Kirtling. 30 letters of support were received:

No wildlife facilities in the area, the building would provide much needed space and facilities, little focused provision for hedgehog rescue/rehabilitation in the district, would provide specialist care for injured and sick wildlife, support volunteering and local engagement, strengthen local resilience, important service for the welfare and protection of wildlife.

2 letters of objection were received:

Loss of agricultural land, unsuitable rural location, disruption to existing local wildlife, there are a number of alternative suitable locations, approval would set a damaging precedent, poor access to the site, concerns around funding.

140 comments were received from outside of the District. All 140 are letters of support:

Wildlife hospital desperately needed, outgrowing the current premises, only place for miles where wildlife can be taken, hedgehogs need help, praise for the applicant and the work that she does, the proposed hospital is modest in scale, development has destroyed wildlife habitats, the proposed location appears well suited, would provide an essential service for wildlife, wildlife hospital will be an asset to the village, hedgehogs are in decline, many vets and organisations such as the RSPCA are unable to accept or treat certain species, habitat being lost due to development, plans have been scaled back, ECDC has a Hedgehog Recovery Campaign.

A letter of support has also been received from Vets 4 Pets, Newmarket:

Newmarket Vets 4 Pets are in full support of the planning for this new hospital. It will be a great asset to the area, and it will be hugely beneficial to the local wildlife and their rehabilitation. If it did go ahead we would be happy to provide veterinary support.

A letter of support has also been received from Cllr Lucius Vellacott:

A few residents in Soham have contacted me about the above application in Kirtling. I do not normally comment on applications outside my ward/neighbouring Soham North, however as this would affect the entire District and has generated public interest in my ward, I am compelled to share a few thoughts.

I would like to express my support for the application.

I understand the application previously faced barriers relating mainly to:

1. *GROWTH 2 (Location)*
2. *Impact on countryside harming character of area*
3. *Noise (inc. lack of highways information)*
4. *Possible highways safety issues, lack of parking information*
5. *Harm to habitats without sufficient BNG*

I do think that considerable weight should be applied to the necessity of a wildlife hospital and the professional contributions to the application from the industry which support this. It is an essential expansion to allow the much-used service to continue.

I am on a preliminary reading of the technical documents assured that the reasons for refusal have been adequately addressed. There may not be the intense level of detail but on balance, as you noted in your original report to committee, there is such strong need for a facility of this nature.

Regarding GROWTH 2, whilst I know officers have to follow the rules as written, I think committee will and should understand that GROWTH 2 is intended to prevent urban sprawl, and a facility like this is very much in the spirit of the exemptions provided. When we talk about not being sure that this location is the best one, we don't consider that the applicant probably can't access any other land...!

Fundamentally, when something as 'good' as this is proposed we should be looking for absolutely every reason to say 'yes' to it and I really hope planning committee will do so provided there is reassurance (which I believe there is) that the issues have been addressed.

6.0 THE PLANNING POLICY CONTEXT

6.1 East Cambridgeshire Local Plan 2015 (as amended 2023)

GROWTH 2	Locational strategy
GROWTH 5	Presumption in favour of sustainable development
ENV 1	Landscape and settlement character
ENV 2	Design
ENV 4	Energy and water efficiency and renewable energy in construction
ENV 7	Biodiversity and geology
ENV 8	Flood risk
ENV 9	Pollution
COM 7	Transport impact
COM 8	Parking provision

6.2 Supplementary Planning Documents

Design Guide
Country Wildlife Sites
Natural Environment SPD
Climate Change SPD
Flood and Water

6.3 National Planning Policy Framework (December 2024)

- 2 Achieving sustainable development
- 4 Decision-making
- 9 Promoting sustainable transport
- 12 Achieving well-designed places
- 14 Meeting the challenge of climate change, flooding and coastal change
- 15 Conserving and enhancing the natural environment

- 3 Decision-making policies
- 4 Achieving sustainable development
- 5 Meeting the challenge of climate change
- 14 Achieving well-designed places
- 15 Promoting sustainable transport
- 19 Conserving and enhancing the natural environment

6.4 Planning Practice Guidance

7.0 PLANNING MATERIAL CONSIDERATIONS AND COMMENTS

7.01 It is our understanding that from 24th December 2025, the Local Nature Recovery Strategy will have been published, and we further understand that this site is highly likely to be allocated for a woodland measure under Policy WO3A, the action for which states:

“WO3A - improve biodiversity by creating mixed deciduous woodland consisting of appropriate native or climate change tolerant (European only) species to increase resilience and diversity. Such newly created woodlands are to be within 2.5 kilometres of existing woodland, though in practice should be much closer (ideally within 500 metres).”

Newly created woods would ideally form a woodland block (or group of woodlands within 200 metres of each other) which are at least 40 hectares in size. Woodland creation would be expected over approximately 80% of the site area mapped under this measure, with the remaining 20% a mosaic of other complementary habitats such as species-rich grassland, scrub, ponds, and individual trees.”

This means that the site is to be officially allocated as being in an ‘Area that could become of particular importance for biodiversity (ACB), specifically for woodland’ and the decision maker has to have regard to this.

However, due to report writing deadlines, at the time of writing there is insufficient information to be able to make an informed judgement as to the bearing of the above on the application. Therefore, a verbal update will be provided on this topic at the committee meeting.

7.1 Principle of Development

7.1.1 Policy GROWTH 2 states that outside of the development envelopes, development will be strictly controlled, having regard to the need to protect the countryside and the setting of towns and villages. Development will be restricted to the main categories listed in the policy, and may be permitted as an exception, providing there is no significant adverse impact on the character of the countryside and that other Local Plan policies are satisfied.

7.1.2 The planning statement sets out that it is ‘*abundantly clear that such a use is acceptable*’, based on the development types listed as exceptions to Policy GROWTH 2 which include:

- Dwellings for essential rural workers
- Residential care homes
- Small-scale employment development
- Horse racing and equestrian development
- Renewable energy development; and
- Agriculture, horticulture and forestry

7.1.3 The planning statement also states that it is disingenuous to dismiss the proposal on the basis of Policy GROWTH 2 as:

‘The proposal includes a dwelling for an essential rural worker. Whilst the development would provide care for wild animals, as opposed to care for humans – there are parallels to be drawn with residential care homes. The development comprises small-scale employment – of the applicant and volunteers, as well as peripheral employment of vets, suppliers etc. If the proposal was for a horse hospital, it would be captured by Policy GROWTH 2 – which raises the obvious point – that such development is in the Countryside where one expects to find animals. The proposal incorporates renewable energy development and is not too far removed from an agricultural use; instead of the growing of animals for food, the proposal rehabilitates animals to maintain wild populations.’

7.1.4 The proposal is not comparable to a residential care home. While it may provide some employment in the future, the relevant policy (EMP 3) is only for B1, B2 and B8 uses. It is correct that if the proposal was for equine use, it would be captured by GROWTH 2 and EMP 5 but it is not. The proposal is not for an agricultural use.

7.1.5 The proposal does not fall within any of the exception policies listed in GROWTH 2 and therefore would be unacceptable in principle. Therefore, to depart from policy, there would need to be sufficient justification as to why the hospital needs to be sited in this specific location.

7.1.6 Following assessment of the original submission, officers concluded that sufficient justification had not been provided as to why the hospital needed to be located in this specific location or why someone needed to live on site.

7.1.7 It was unclear in the previous submission as to where other wildlife hospitals are within the local area. Clear information has now been submitted as to where the other wildlife hospitals are. It is considered that it has been sufficiently demonstrated that there are no other wildlife hospitals in close proximity. From Ely, the proposed site would be approximately a 20-mile drive, with Shepreth Hedgehog Hospital being approximately 28 miles. The LPA accept that there is a lack of these types of facilities and that there is a need for one in the locality.

7.1.8 The current submission includes the same site assessment as previously submitted. It is noted that largely that the land became unavailable (sold to someone else, higher offer made by someone else) or that it was too far for volunteers rather than being unsuitable for the animals. It is also noted that in respect of Newton Cricket Ground that the alternative site assessment states that 10.5 acres is ‘small but

adequate' and at a site in Ousden that part of the reason the land was not pursued was because the land available was not sufficient and then lists the size as 2.5 acres. The alternative site assessment now includes the application site but the size of 27 acres is misleading. The land within the red line of this application equates to approximately 1.21 acres and therefore is smaller than both of the above. This suggests that the scale of the site at Kirtling may be insufficient and that further land may be required; the applicants Design and Access Statement (DAS) states that '*While the sale includes a larger parcel of land (27 acres), this application pertains solely to a 1.21-acre area, as delineated by the red line boundary. However, the broader site should be considered within the context of a long-term strategic vision for conservation and wildlife rehabilitation.*' It must be made clear that only the land within the red line would have permission for this use, if permission were to be granted.

7.1.9 The site selection assessment sets out that this site was identified as the most suitable location, as it was considered to meet all of the essential criteria more effectively than any of the alternative sites considered, offering a balance of accessibility for the public while remaining secluded from major roads, residential areas, and overhead power lines and that this ensures an optimal environment for wildlife recovery. However, the DAS also sets out that '*in many cases, animals are returned to the same area once rehabilitated and ready for release*' and specifically in relation to hedgehogs, states that all hedgehogs will be returned to their found location and where this is not possible a new location will be found but they will not be released on site due to the presence of the badger sett. In addition to this, there is no requirement known to the LPA that a facility of this nature has to be in the countryside.

7.1.10 The alternative site assessment considers the whole size of the site, not just that within the red line boundary. It assesses the access as 'good' when actually it needs significant upgrades to be acceptable for the use proposed (this will be addressed in full in the Highways section of this report). In addition, animals will not be rewilded here, and hedgehogs cannot be rewilded here which means increased trips to other locations to carry this out.

7.1.11 From the information presented, it is concluded that whilst there is a need for a wildlife hospital, it has not been demonstrated that it needs to be in this location. The need does not outweigh the harm and impact to the countryside, discussed in further detail in the Visual Amenity section.

7.1.12 In respect of the residential accommodation proposed, the justification that has been given is limited in detail but states that it is related to the '*rigours of hourly feeds, the administration of medication at all hours and positioning to respond to emergencies as they arise*' and that the animals require continuous 24/7 care. While the LPA believe there would be a need for someone to be on site 24/7, it is considered that there is still insufficient justification for someone to live on site. It is not detailed as to why this could not be managed through shift work; even just the feeding requirements would require someone to be up all night and working. While there may be emergencies to deal with, the hourly feeding and medication administration are planned tasks that can be programmed into a workers' shifts.

7.1.13 The LPA does not consider the proposal to fall within Policy HOU 5 'rural workers dwellings.' A proposal would only fall within the definition of an essential rural worker if it is for the purposes of attending the essential needs of a rural activity. Unless it can be demonstrated that the specifics of the business/activity require it to be located in a rural location then it does not meet the definition of an essential rural worker. As noted above, the LPA consider that it has not been demonstrated that the proposal needs to be in this location; furthermore, the Council's Ecologist has confirmed there is no legislative requirement for a wildlife hospital to have a countryside location. However, even if the LPA accepted that it was relevant, it is considered that it would not comply with the policy. It has not been demonstrated that a dwelling is essential to the needs of the business. It has not been demonstrated that the enterprise will remain financially viable, it has not been demonstrated that the dwelling would be unusually expensive to construct in relation to the income that the enterprise could sustain and it is not sited to avoid visual intrusion – this remains one of the reasons for refusal.

7.1.14 In December 2025, a consultation for the revised National Planning Policy Framework (NPPF) was launched. At the time of the committee meeting, the revised NPPF will still be in consultation and holds very limited weight in the decision-making process. However, it provides clear direction in respect of development in the countryside.

7.1.15 Policy s5 of the revised NPPF states that only certain forms of development should be approved outside of settlements. Those forms of development are listed within the policy. The LPA consider that the proposal does not fall within any of the exceptions listed. In respect of development proposals that do not fall within one of the categories listed, policy s5 states that they should only be approved in exceptional circumstances where the benefits of the proposal substantially outweigh the adverse effects, including to the character of the countryside and in relation to promoting sustainable patterns of movement. It is therefore considered that the proposal is contrary to this policy for the reasons set out above. In addition, the location of development is discussed in other chapters of the revised NPPF, such as Chapter 5 (meeting the challenge of climate change), where it states that development proposals should be located where a genuine choice of sustainable modes of transport exist.

7.1.16 In respect of rural workers dwellings, Policy HO11 of the revised NPPF states that development proposals for isolated homes in the countryside should only be supported where '*there is an essential need for a rural worker, including those taking majority control of a farm business to live permanently at or near their place of work in the countryside.*' This is the same wording as the current NPPF and therefore does not alter the LPA's stance on this element of the proposal.

7.1.17 While the proposal is much clearer as to the operation of the site, it has still failed to demonstrate as to why it needs to be in this specific location or why someone needs to live at the site. The proposal is therefore considered to be contrary to GROWTH 2 of the East Cambridgeshire Local Plan, 2015 (as amended).

7.2 Visual Amenity

7.2.1 Policy ENV 1 of the East Cambridgeshire Local Plan, 2015 states that development proposals should ensure that they provide a complementary relationship with the existing development and conserve, preserve and where possible enhance the distinctive and traditional landscapes and key views in and out of settlements. Policy ENV 2 states that development proposals ensure that the location, layout, massing, materials and colour of buildings relate sympathetically to the surrounding area.

7.2.2 The proposed wildlife hospital would be situated on a parcel of land along Water Lane and would occupy approximately 0.48 hectares (1.21 acres) of the wider site. The site is visible from a number of vantage points; from Water Lane, from the Public Right of Way which runs to the east of the site and from Woodditton Road.

7.2.3 The original submission proposed to construct the hospital out of storage containers. Officers recommended refusal on the basis that the storage containers were unlikely to result in a high-quality design. It was also considered that the number of buildings resulted in overdevelopment and that the proposal resulted in a large amount of development projecting into the countryside against the general pattern of development.

7.2.4 The current proposal has removed all of the additional buildings so the only building proposed is the hospital itself. The DAS sets out that the design echoes nearby farm buildings and illustrates how the final design has been achieved. The proposed building is made up of four rectangular elements with a courtyard in the centre. The materials proposed are red brickwork, black painted weatherboard, treated oak frames and clay pantiles for the roof. The aviary would be wire mesh.

7.2.5 The design in isolation is of a much higher quality than that previously proposed, and it is considered that element of the previous recommended reason for refusal has been resolved. However, the proposed building is still a very large building, measuring approximately 50 metres (164ft) in width, 41 metres (135.5ft) in depth at its deepest point and approximately 6.5 metres (21.32ft) in height at its highest point. It is considered that by virtue of its scale and location that it would still result in a large amount of development projecting into the countryside against the general pattern of development. In addition, the proposal includes a large area of hardstanding to accommodate the access and parking which would further erode the rural nature of the countryside.

7.2.6 There is also a tree belt along the northern boundary of the wider site and hedgerows around the wider site. The tree belt along the northern boundary of the site does screen the site from view on approach from Woodditton Road from the north. Within the site, there is some tree and hedge planting proposed, and further tree planting proposed around the perimeter of the wider site. It is considered that while the tree planting may assist in softening the development, landscaping cannot be used to screen harmful development and cannot be relied upon in perpetuity.

7.2.7 The proposal would result in significant harm to the character and appearance of the area by virtue of the scale of the development proposed and is therefore

contrary to Policies ENV 1 and ENV 2 of the East Cambridgeshire Local Plan, 2015 (as amended) and Chapter 12 of the National Planning Policy Framework (2024).

7.3 Residential Amenity

7.3.1 Policy ENV 2 of the East Cambridgeshire Local Plan, 2015 states that new development will be expected to ensure that there is no significantly detrimental effect on the residential amenity of nearby occupiers and that occupiers and users of new buildings, especially dwellings, enjoy high standards of amenity.

7.3.2 The closest dwellings to the site are situated to the north of the site on Woodditton Road and The Green. The main issues raised by neighbours in respect of residential amenity are increased traffic and noise and disturbance.

7.3.3 It is considered that the physical development would not result in harm to the amenity of neighbouring dwellings, in respect of overshadowing, overbearing or overlooking as there is sufficient distance between the site and the neighbouring properties to avoid these impacts.

7.3.4 Concern was raised previously around how the site would be powered as this was ambiguous. The DAS sets out that the energy source would be a solar voltaic array comprising 66 panels with integrated battery storage and three Air Source Heat Pumps (ASHP). The Council's Environmental Health Officer has commented that these elements would fall under the control of the noise condition previously recommended. However, this condition requires that the specific noise level omitted from the site shall not exceed background level. Given the location of the site and that background noise is likely to be very low, it is considered that this condition would be easily breached. Officers consider that this condition would not be reasonable to impose as it is unknown whether it could be complied with.

7.3.5 As it is considered that the condition could not be imposed, the LPA would need to be satisfied that no adverse noise impacts would occur. No information relating to the noise of these elements has been submitted and therefore it is not possible for the LPA to make a sound judgement as to whether there will be an impact to the amenity of neighbouring dwellings.

7.3.6 There was concern in relation to noise and disturbance from vehicle movements but there was previously little information provided as how the site would operate. The current submission sets out that it is envisaged that the hospital would ultimately employ three full time nursing staff working 09:00-18:00 and three part time assistants working 18:00-21:00. In addition to this, there would be a full-time office manager and an administrative assistant working 09:00-17:00. The Transport Report concludes that on a worst-case basis, that there would no more than 8 vehicle trips to the hospital (16 two-way movements – 8 arrivals/8 departures). This is based on three members of staff, the applicant and one vet surgeon (five people in total), with visitor traffic to the site is expected to be intermittent with 2-10 animal related visits per day and deliveries averaging two movements per day. For clarity, these numbers are based on movements taking place during the AM and PM peak highway periods.

7.3.7 While this assessment was undertaken for highways and transport purposes and not noise, the worst-case basis is 8 vehicle movements in the AM and PM peak times. Therefore, the remainder of the day would have more sporadic vehicle movements. It is therefore considered that there is unlikely to be a significant adverse impact to residential amenity from the vehicle movements, however the LPA does not have surety that the solar panels with battery storage and air source heat pumps would not create a noise impact, particularly in a very quiet area.

7.3.8 It is considered that the proposal lacks sufficient information to fully assess the potential impacts to the residential amenity of neighbouring dwellings. The proposal is therefore contrary to Policy ENV 2 of the East Cambridgeshire Local Plan, 2015 (as amended).

7.4 Highways

7.4.1 Policy COM 7 of the East Cambridgeshire Local Plan, 2015 states that development proposals shall provide a safe and convenient access to the highway network.

7.4.2 The site would be accessed from Long Acre. From the plans submitted, the access would be upgraded with hardstanding (off white limestone gravel) as it is currently an informal field access.

7.4.3 The application was previously recommended for refusal on the basis that there was insufficient information for both the Local Planning Authority and the Local Highway Authority (LHA) to assess whether there would be any significant impacts to the operation of the highway.

7.4.4 The LHA have been consulted and have commented that the Transport Report outlines that the facility is expected to generate additional vehicle movements along Long Acre due to the employment of approximately eight staff, onsite accommodation for the applicant, four treatment rooms and one intensive care room, as well as movements associated with veterinary personnel, a wildlife ambulance, visitors dropping off limited wildlife, and servicing activities related to the management and maintenance of the site, its facilities, equipment, and deliveries.

7.4.5 The LHA consider that at the present time, Long Acre is inadequate to serve the scale of the development proposed within the application by virtue of its restricted width, lack of passing places and poor geometry and width of its junction with Woodditton Road. They consider that the arrangement appears to be inadequate to facilitate two-way vehicular movements.

7.4.6 To make the development acceptable, appropriate measures to mitigate the potential increased risk of highway safety issues must be provided and the LHA have advised that this should include the provision of a passing bay along Long Acre, equidistant between the site and junction at Woodditton Road and the regularisation of the junction between Long Acre and Woodditton Road to enable two vehicles to pass in the junction without hinderance. However, it is for the applicant to put forward an acceptable mitigation scheme.

7.4.7 The LHA have concluded that while the intensification of the use of the junction, based on the Transport Report provided, looks to be fairly modest, they consider that the highway works are necessary to accommodate any intensification of use to ensure safe and suitable access can be made to the site. They have commented that given the variety of vehicles that will access the site that provision must be made to allow two-way vehicle movements to the site to prevent obstruction to the carriageway, verge damage or reversing manoeuvres onto Woodditton Road.

7.4.8 The scheme would not be considered acceptable without upgrades to the road as set out above. It is therefore considered that it would be necessary to impose a condition, should the application be approved, that the scheme and the highway works are carried out prior to any other development on site. This is to ensure that the access is suitable for the intensification of use that the hospital will result in.

7.4.9 The LHA have further commented that the access width is slightly below that which the LHA would consider acceptable for development of this scale. They have requested a condition that the access width be 5m (16.4ft) in width for 8m in length. They have also commented that the impact of construction should be considered and have recommended a condition for a Construction Traffic Management Plan (CEMP) to include measures to prevent damage to the highway verges.

7.4.10 Additional conditions requested are that any gates to be set back a minimum of 10 metres (32.8ft), that the access is constructed so its falls are levels are such so that no private water drains across or onto the public highway and that the vehicular access is constructed using a bound material for the first 5 metres (16.4ft).

7.4.11 Policy COM 8 of the East Cambridgeshire Local Plan, 2015 states that development proposals should provide adequate levels of car and cycle parking.

7.4.12 There are no parking standards in the Local Plan for this type of development. The submitted information shows that 10 parking spaces are proposed. There are six spaces for staff (including handover periods), a dedicated space for the hospital ambulance to the rear of the building, a disabled parking space, an allocated space for a visiting vet and a designated animal drop off space which will also serve deliveries. Cycle parking has been provided to accommodate four bicycles.

7.4.13 The LHA have commented that the parking provision provided on site may not be adequate for the scale of the development and that due to its restricted carriageway width, Long Acre is not a suitable location for any overspill parking and therefore adequate parking provision should be provided on site.

7.4.14 The parking provision does appear to be on the low side, particularly as the drop-off and delivery space is shared, and it is estimated that there would be an average of 2-10 animal drop-offs per day and 2 deliveries.

7.4.15 However, there are six staff parking spaces. Based on the staffing numbers provided, there will be five staff present during the day (three nursing staff and two admin staff) which would leave a staff space free between 9am and 5pm. The admin staff would finish at 5pm, with the evening shift starting at 6pm. Around this time, it is likely that all staff spaces would be taken but once the day shift nursing staff left for the day, three spaces would then be available. Aside from the hour or

so of the day when handover would occur, there would be additional parking spaces available.

- 7.4.16 It is considered that the parking is likely to be sufficient given that there will be staff spaces available for much of the day, if, for example, a drop-off and a delivery were to be on site at the same time.
- 7.4.17 Originally it was proposed to have an educational classroom, conference facilities and community engagement (for example, visits from Brownie groups on site) and these have been removed from the proposal, with the focus just being on the wildlife hospital. However, given that these activities could result in a significant intensification of the site, it is considered that if the application were approved, it would be reasonable to restrict the use to a wildlife hospital only and that no secondary/ancillary uses can take place at the site.
- 7.4.18 It is considered that with the imposition of the conditions requested by the Local Highway Authority that the proposal is considered to comply with Policies COM 7 and COM 8 of the East Cambridgeshire Local Plan, 2015 (as amended).

7.5 Ecology and Trees

- 7.5.1 Policy ENV 7 of the East Cambridgeshire Local Plan, 2015 states that all applications for development that may affect biodiversity and geology interests must be accompanied by sufficient information to be determined by the Local Planning Authority, including an ecological report, to allow potential impacts and possible mitigation measures to be assessed fully. It also states that all development will be required to protect the biodiversity and geological value of land and buildings and minimise harm to or loss of environmental features, such as trees, hedgerows, woodland, wetland and ponds. Policy ENV 1 states that development proposals should protect, conserve and where possible enhance the pattern of distinctive historic and traditional landscape features such as watercourses, characteristic vegetation, individual and woodland trees, field patterns, hedgerows and walls and their function as ecological corridors for wildlife dispersal. Policy ENV 2 states that all development proposals will be expected to make efficient use of land while respecting the density, urban and village character, public spaces, landscape and biodiversity of the surrounding area.
- 7.5.2 The Council has adopted the Natural Environment SPD which states that all developments must result in biodiversity net gain.
- 7.5.3 Since April 2024, it has been mandatory to provide 10% Biodiversity Net Gain (BNG) unless exempt.
- 7.5.4 The application was previously recommended for refusal on the basis that there was insufficient information submitted for the LPA to be satisfied that the proposal would not result in harm to protected species and would protect, mitigate and enhance biodiversity.
- 7.5.5 Initially when the information was resubmitted, the Council's Senior Ecologist objected on the basis that there was an error in the Biodiversity Net Gain (BNG) metric due to the omission of a small area of the Protected Road Verge (PRV). The

LPA decided to allow the applicant to address this as there was disagreement around the location of the PRV and if it had not been resolved and the baseline was not agreed then a positive decision could not have legally been issued, should members be minded to approve the application.

7.5.6 In respect of BNG, additional information has now been submitted with the full extent of the PRV included within the baseline. The Council's Senior Ecologist has commented that they approve the baseline, and the application meets the legal minimum requirement for BNG. The proposals for the mitigation of the Protected Road Verge (collecting seed from the existing habitat or other suitable alternative) are considered to be acceptable. They have also commented that not all habitat features within the red line boundary are set out in the plan and there is a lot of detail in terms of offsite habitats which are outside of the red line boundary, but these matters can be addressed at discharge of condition stage.

7.5.7 They have further commented that there are some small inconsistencies in the submitted information and the ecology report does not cover the creation of ponds within the red line boundary, however, these minor issues can be dealt with as part of the mandatory BNG condition. A s106 agreement is required to secure the compensation for the degradation of the PRV.

7.5.8 In respect of ecology, the Senior Ecologist has confirmed that they support the application with conditions. The conditions requested are that the mitigation measures in section 6 of the ecology report are strictly followed, a Species Release Schedule to be submitted to prevent harm to protected species, details of escape prevention measures and disease control measures to be submitted to prevent harm to protected species and a biodiversity enhancements schedule detailing the type and location of the proposed enhancements.

7.5.9 The conditions requested would be reasonable and necessary to impose as they would fully address issues which were previously a concern to the LPA and contributed to the reason for refusal.

7.5.10 With the additional information submitted and the imposition of the conditions as set out above, it is considered that the reason for refusal previously given has been resolved.

7.5.11 The Council's Trees Officer has verbally raised concern about the long-term viability of the tree in the courtyard due to the netting proposed above it, however, a soft landscaping scheme is required by condition to provide specific details of the planting proposed and this concern could be addressed through that plan.

7.5.12 The proposal is therefore considered to comply with Policies ENV 1, ENV 2 and ENV 7 of the East Cambridgeshire Local Plan, 2015 (as amended), the Natural Environment SPD and Chapter 15 of the NPPF.

7.6 Flood Risk and Drainage

7.6.1 Policy ENV 8 states that all developments and re-developments should contribute to an overall flood risk reduction. The sequential and exception test will be strictly applied across the district and new development should normally be located in

flood zone 1; the application site is situated in flood zone 1 and therefore is considered to be acceptable.

7.6.2 The Planning Statement sets out that surface water would be disposed through a network of underground pipes connecting roof downpipes and external drainage points into a designated wildlife pond. The pond has been designed to provide natural attenuation, allowing water to be stored and gradually released.

7.6.3 Foul drainage would be managed via an on-site treatment plant and once filtered and treated, outflow would be directed to the wildlife pond. This would require Building Regulations approval and at this stage a percolation test and design of the drainage field would be required. This type of development must have building regulations approval and may require a permit from the Environment Agency, both of which are legislation separate to planning. The applicant would need to apply separately for these consents, and any grant of planning permission does not negate the need to comply with other relevant legislation.

7.6.4 The submitted information states that the water supply would come via a borehole. The DAS states that the precise location will be determined following a hydro ecological survey. While this means that there is a lack of information available at this time, this element of the proposal may require separate planning permission and Environment Agency consent. To ensure that a water supply has been secured, if approved, a condition could be imposed that details of the water supply are provided to the LPA prior to the commencement of development.

7.6.5 There are no obvious concerns or objections to the methods of water disposal and therefore the proposal is considered to comply with Policy ENV 8 of the East Cambridgeshire Local Plan, 2015 (as amended).

7.7 Climate Change

7.7.1 Local Plan Policy ENV4 states: 'All proposals for new development should aim for reduced or zero carbon development in accordance with the zero carbon hierarchy: first maximising energy efficiency and then incorporating renewable or low carbon energy sources on-site as far as practicable' and 'Applicants will be required to demonstrate how they have considered maximising all aspects of sustainable design and construction.' The adopted Climate Change SPD encourages all development to include sustainability measures within their proposal.

7.7.2 The revised proposal includes sustainability benefits which includes 66 solar panels, Air Source Heat Pumps and a renewable energy strategy.

7.7.3 However, it is considered that there would be sufficient scope to incorporate a number of sustainability benefits and if approved a detailed sustainability statement could be conditioned.

7.7.4 With the imposition of a condition for the submission of a sustainability statement, it is considered that the proposal would comply with Policy ENV 4 of the East Cambridgeshire Local Plan, 2015 (as amended) and the Climate Change SPD.

7.8 Other Material Matters

7.8.1 Concern has been raised regarding (including by the Parish Council) how the build would be funded and what would happen if the applicant were to run out of money. The LPA would not routinely seek a funding plan or confirmation of how a development was being funded in relation to an application unless clearly relevant. An example of this would be the stipulation in HOU5 that applications for rural workers dwellings must demonstrate that the enterprise must be and remain financially viable. While the applicant has asserted that HOU 5 is relevant, the LPA do not and therefore this information has not been sought. If the application were being approved, a condition would be imposed for a phasing plan to set out the intended stages of delivery at the site.

7.8.2 There has been reference made throughout the application and the comments received as to ECDC supporting hedgehogs through the adoption of the Hedgehog SPD. However, the SPD is to inform the reader what the average developer should do, such as create hedgehog highways as part of their development, rather than express any type of support for development of this nature.

7.9 Planning Balance

7.9.1 There is undoubtedly a lot of support for the application as evidenced by the number of positive comments received both times the LPA have consulted. There are also a number of positive elements to the application such as supporting wildlife and the positive benefits that the proposal brings to those who volunteer at the current establishment. Letters of support have also been submitted from vets, other wildlife hospitals and charities including the British Hedgehog Preservation Society.

7.9.2 However, when considering the material planning considerations, the proposal is unacceptable in principle, results in harm to the character and appearance of the area and lacks sufficient information to assess the impacts of the proposal to residential amenity.

7.9.3 It is considered that while there is a lot of support for the proposal, there have been objections received from residents who live close to the site. Weight has been given to the letters of support from vets and other wildlife professionals, however, there are no material planning considerations that outweigh the significant conflicts with policies outlined in this report and the resulting three reasons for refusal.

8.0 Human Rights Act

The development has been assessed against the provisions of the Human Rights Act 1998, and in particular Article 8 (right to respect for private and family life) and Article 1 of the First Protocol (protection of property). Under the Act, it is unlawful for a public authority, such as East Cambridgeshire District Council, to act in a manner that is incompatible with the European Convention on Human Rights. In arriving at this recommendation, due regard has been given to the applicant's reasonable development rights and expectations which have been balanced and weighed against the wider community interests, as expressed through third party interests / the Development Plan and Central Government Guidance. The Council is also permitted to control the use of property in accordance with the general interest and the recommendation set out below is considered to be a proportionate

response to the submitted application based on the considerations set out in this report.

9.0 **Equalities and Diversities**

In considering this planning application due regard has been had to the public sector equality duty (PSED) under Section 149 of the Equality Act 2010, which means that the Council must have due regard to the need (in discharging its functions) to put an end to unlawful behaviour that is banned by the Equality Act, including discrimination, harassment and victimisation and to advance equality of opportunity and foster good relations between people who have a protected characteristic and those who do not. Account has been taken of the PSED and it is considered that the recommendation set out below would not undermine the objectives of the duty.

10 APPENDICES

Appendix 1: Original Officer Report

PLANS

The following plans are a selection of those submitted as part of the application and are provided to illustrate the proposed development. They may not be to scale. The full suite of plans can be found on the Council's website.

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