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Our ref: 458961
Your ref: CCC/23/110/FUL



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BY EMAIL ONLY

Dear Helen,

Planning consultation: Farm-based anaerobic digestion renewable energy facility, construction of vehicular access/road to A1307, associated infrastructure and landscaping

Location: Land At Streetly Hall Farm, Webbs Road, West Wickham, Cambridge, Cambridgeshire CB21 4RP

Thank you for your consultation on the above dated 27 October 2023. This letter replaces our previous response dated 17 November 2023 (ref 456391).

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

SUMMARY OF NATURAL ENGLAND'S ADVICE

FURTHER INFORMATION REQUIRED TO DETERMINE IMPACTS ON DESIGNATED SITES

As submitted, the application could have potential significant effects on Alder Carr, Balsham Wood, Over and Lawn Woods, Fleam Dyke, Furze Hill, and Roman Road Sites of Special Scientific Interest (SSSI). Natural England requires further information in order to determine the significance of these impacts and the scope for mitigation.

The following information is required:

- Details of lagoons and lagoon cover type.
- Revised in-combination assessment for air quality impacts on SSSIs.
- A detailed foul and surface water drainage plan and pollution prevention strategy to demonstrate no adverse effect on the natural environment including nearby water dependent sites.
- Consideration of digestate storage size.
- Your authority should consider whether water resources to meet the needs of this development alone, and in-combination with other proposed development, can currently be supplied sustainably and without further adverse impact to the natural environment.

Without this information, Natural England may need to object to the proposal.

Please re-consult Natural England once this information has been obtained.

Natural England's further advice on designated sites/landscapes and advice on other issues is set out below.

Additional Information required

Air Quality

The proposal triggers the impact risk zones for Balsham Wood, Over and Lawn Woods, Fleam Dyke, Furze Hill, and Roman Road SSSIs as they all include designated features which are sensitive to air quality. Natural England has reviewed the submitted Air Quality Assessment and is pleased that all of these sites have been included, however, we have the following comments:

A mixture of feedstocks are proposed, which have the potential for higher emissions than cattle slurry alone. We recommend that this is acknowledged in the air quality assessment.

It is welcomed that the liquid digestate lagoon is to be covered, however we require further detail about the specific type of cover to be used. Different cover types achieve differing reductions in emissions so we cannot accept the assessment's assumptions regarding percentage emission reduction without this clarification. The detailed specification of the digestate lagoon cover should be provided, including the material that the cover will consist of, if it will be entirely sealed and whether this cover will be rigid, or floating. References should be provided to evidence the emissions reduction value of the proposed cover type. A suitable specific cover type needs to be legally secured through the planning process to ensure the assessment remains accurate, and that any future replacement covers are of equivalent or better effectiveness.

In addition to the digestate lagoon, the submitted Proposed Site Layout includes a surface water lagoon (26) and a dirty water lagoon (27). No reference appears to be made to these features in the air quality assessment. Clarification should be provided about the contents of these lagoons, and whether there is a risk that they could be classed as slurry. If there is a potential for emissions to arise from these lagoons, they need to be included in the air quality assessment, and the need for covers or other mitigation should be considered.

We are aware that a separate Anaerobic Digester (AD) proposal has recently been submitted to Suffolk County Council, ref SCC/0045/23SE, which is in close proximity to these proposals. The Suffolk AD plant has not been included within the in-combination air quality assessment as it was not identified at the time of writing. We now require this to be re-evaluated due to the potential for significant in-combination effects, particularly on Over and Lawn Woods SSSI as both proposals are less than 2.5km from this air quality sensitive protected site. Please note however, that the Suffolk AD plant's air quality assessment is currently subject to a 'further information' request from Natural England, so conclusions may not be fully relied upon until the concerns mentioned in our letter of 23 October 2023 (ref 451923) have been resolved.

Water Quality

There are a number of protected sites downstream of the proposals, with the nearest of these being Alder Carr SSSI. This SSSI woodland is water quality sensitive and subject to flooding from the River Granta, which is hydrologically connected to the proposals.

We note that the surface water lagoon is not proposed to have an outfall to a watercourse, but following the Lead Local Flood Authority's response it is likely that this may need amending. There is also potential for any leakage or flood overflow to enter the groundwater or watercourses, such as in the case of pump failure (as mentioned by the LLFA) or structural failure due to concrete corrosion (as described by the Environment Agency). We echo the recommendations of the LLFA and EA that further consideration is required, and are concerned that there may be a risk to protected sites, should adverse scenarios occur. We therefore request that a detailed foul and surface water drainage plan and pollution prevention strategy is produced to demonstrate no adverse effect on the natural environment including nearby water dependent sites.

The size of the digestate storage facility should be large enough to store the digestate produced until the optimum time of year for fertiliser usage, rather than it having to be spread on fields when the lagoon is full but not required by plants (see section 2.2 of [Code of good agricultural practice \(COGAP\) for reducing ammonia emissions \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/421222/code_of_good_agricultural_practice_cogap_for_reducing_ammonia_emissions.pdf)). This will reduce the risk of excess nutrients being washed off fields and entering groundwater and surrounding watercourses, or released to the air. We have not found calculations to show that this is the case, and would like this to be considered.

Water Resources

We note from the applicant's submitted Statement of Sustainable Design and Construction that this proposal, alone, will consume around 10,000m³ water or more, from the mains supply, per year.

Evidence being gathered to inform the Integrated Water Management Study for the Greater Cambridge Local Plan indicates that groundwater abstraction from the Cambridge aquifer, to meet current needs, is already damaging the natural environment including water dependent SSSIs. Your authority should consider whether water resources to meet the needs of this development alone, and in-combination with other proposed development, can currently be supplied sustainably and without further adverse impact to the natural environment, in accordance with the relevant policies of the adopted Cambridgeshire and Peterborough Minerals and Waste Local Plan 2036 including Policy 22: Flood and Water Management. Should development be permitted we would expect your authority to ensure that the new development meets the highest water efficiency standards.

Please note that if your authority is minded to grant planning permission contrary to the advice in this letter, you are required under Section 281 (6) of the Wildlife and Countryside Act 1981 (as amended) to notify Natural England of the permission, the terms on which it is proposed to grant it and how, if at all, your authority has taken account of Natural England's advice. You must also allow a further period of 21 days before the operation can commence.

Other advice

Further general advice on the protected species and other natural environment issues is provided at Annex A.

For any correspondence or queries relating to this consultation only, please contact me on catherine.duerden@naturalengland.org.uk

For all new consultations, please contact consultations@naturalengland.org.uk

Should the applicant wish to discuss the further information required and scope for mitigation with Natural England, we would be happy to provide advice through our [Discretionary Advice Service](#).

Please consult us again once the information requested above, has been provided.

Yours sincerely

Catherine Duerden
Sustainable Development Lead Adviser - West Anglia Team

Annex A – Additional advice

Natural England offers the following additional advice:

Landscape

Paragraph 174 of the [National Planning Policy Framework](#) (NPPF) highlights the need to protect and enhance valued landscapes through the planning system. This application may present opportunities to protect and enhance locally valued landscapes, including any local landscape designations. You may want to consider whether any local landscape features or characteristics (such as ponds, woodland, or dry-stone walls) could be incorporated into the development to respond to and enhance local landscape character and distinctiveness, in line with any local landscape character assessments. Where the impacts of development are likely to be significant, a Landscape & Visual Impact Assessment should be provided with the proposal to inform decision making. We refer you to the [Landscape Institute](#) Guidelines for Landscape and Visual Impact Assessment for further guidance.

Best and most versatile agricultural land and soils

Local planning authorities are responsible for ensuring that they have sufficient detailed agricultural land classification (ALC) information to apply NPPF policies (Paragraphs 174 and 175). This is the case regardless of whether the proposed development is sufficiently large to consult Natural England. Further information is contained in [GOV.UK guidance](#). Agricultural Land Classification information is available on the [Magic](#) website on the [Data.Gov.uk](#) website. If you consider the proposal has significant implications for further loss of 'best and most versatile' agricultural land, we would be pleased to discuss the matter further.

Guidance on soil protection is available in the Defra [Construction Code of Practice for the Sustainable Use of Soils on Construction Sites](#), and we recommend its use in the design and construction of development, including any planning conditions. For mineral working and landfilling separate guidance on soil protection for site restoration and aftercare is available on [Gov.uk](#) website. Detailed guidance on soil handling for mineral sites is contained in the Institute of Quarrying [Good Practice Guide for Handling Soils in Mineral Workings](#).

Should the development proceed, we advise that the developer uses an appropriately experienced soil specialist to advise on, and supervise soil handling, including identifying when soils are dry enough to be handled and how to make the best use of soils on site.

Protected Species

Natural England has produced [standing advice](#)¹ to help planning authorities understand the impact of particular developments on protected species. We advise you to refer to this advice. Natural England will only provide bespoke advice on protected species where they form part of a Site of Special Scientific Interest or in exceptional circumstances.

Local sites and priority habitats and species

You should consider the impacts of the proposed development on any local wildlife or geodiversity sites, in line with paragraphs 175 and 179 of the NPPF and any relevant development plan policy. There may also be opportunities to enhance local sites and improve their connectivity. Natural England does not hold locally specific information on local sites and recommends further information is obtained from appropriate bodies such as the local records centre, wildlife trust, geoconservation groups or recording societies.

Priority habitats and Species are of particular importance for nature conservation and are included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest, on the [Magic](#) website or as Local Wildlife Sites. List of priority habitats and species can be found on [Gov.uk](#). Natural England does not routinely hold species data, such data should be collected when impacts on priority habitats or species are considered likely. Consideration should also be given to the potential

¹ <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

environmental value of brownfield sites, often found in urban areas and former industrial land, further information including links to the open mosaic habitats inventory can be found [here](#).

Ancient woodland, ancient and veteran trees

You should consider any impacts on ancient woodland and ancient and veteran trees in line with paragraph 180 of the NPPF. Natural England maintains the Ancient Woodland [Inventory](#) which can help identify ancient woodland. Natural England and the Forestry Commission have produced [standing advice](#) for planning authorities in relation to ancient woodland and ancient and veteran trees. It should be taken into account by planning authorities when determining relevant planning applications. Natural England will only provide bespoke advice on ancient woodland, ancient and veteran trees where they form part of a Site of Special Scientific Interest or in exceptional circumstances.

Biodiversity and wider environmental gains

Development should provide net gains for biodiversity in line with the NPPF paragraphs 174(d), 179 and 180. It is anticipated that major development (defined in the [NPPF glossary](#)) will be required by law to deliver a biodiversity gain of at least 10% from January 2024 and that this requirement will be extended to smaller scale development in April 2024. For nationally significant infrastructure projects (NSIPs) it is anticipated that the requirement for biodiversity net gain will be implemented from 2025.

Further information on the timetable for mandatory biodiversity net gain can be found [here](#). Further general information on biodiversity net gain can be found [here](#).

The Government's [Biodiversity Metric](#) should be used to calculate biodiversity losses and gains for terrestrial and intertidal habitats and can be used to inform any development project. For small development sites the [Small Sites Metric](#) may be used. This is a simplified version of the [Biodiversity Metric](#) and is designed for use where certain criteria are met.

We advise you to follow the mitigation hierarchy as set out in paragraph 180 of the NPPF and firstly consider what existing habitats within the site can be retained or enhanced. Where on-site measures are not possible, provision off-site will need to be considered.

Development also provides opportunities to secure wider biodiversity enhancements and environmental gains, as outlined in the NPPF (paragraphs 8, 73, 104, 120, 174, 175 and 180). Opportunities for enhancement might include incorporating features to support specific species within the design of new buildings such as swift or bat boxes or designing lighting to encourage wildlife.

Natural England's [Environmental Benefits from Nature tool](#) may be used to identify opportunities to enhance wider benefits from nature and to avoid and minimise any negative impacts. It is designed to work alongside the [Biodiversity Metric](#) and is available as a beta test version.

Further information on biodiversity net gain, the mitigation hierarchy and wider environmental net gain can be found in government [Planning Practice Guidance](#).

Green Infrastructure

Natural England's [Green Infrastructure Framework](#) provides evidence-based advice and tools on how to design, deliver and manage green infrastructure (GI). GI should create and maintain green liveable places that enable people to experience and connect with nature, and that offer everyone, wherever they live, access to good quality parks, greenspaces, recreational, walking and cycling routes that are inclusive, safe, welcoming, well-managed and accessible for all. GI provision should enhance ecological networks, support ecosystems services and connect as a living network at local, regional and national scales.

Development should be designed to meet the [15 Green Infrastructure Principles](#). The Green Infrastructure Standards can be used to inform the quality, quantity and type of green infrastructure to be provided. Major development should have a GI plan including a long-term delivery and management plan. Relevant aspects of local authority green infrastructure strategies should be delivered where appropriate.

GI mapping resources are available [here](#) and [here](#). These can be used to help assess deficiencies in greenspace provision and identify priority locations for new GI provision.

Access and Recreation

Natural England encourages any proposal to incorporate measures to help improve people's access to the natural environment. Measures such as reinstating existing footpaths together with the creation of new footpaths and bridleways should be considered. Links to urban fringe areas should also be explored to strengthen access networks, reduce fragmentation, and promote wider green infrastructure.

Rights of Way, Access land, Coastal access and National Trails

Paragraphs 100 and 174 of the NPPF highlight the important of public rights of way and access. Development should consider potential impacts on access land, common land, rights of way and coastal access routes in the vicinity of the development. Consideration should also be given to the potential impacts on the any nearby National Trails. The National Trails website www.nationaltrail.co.uk provides information including contact details for the National Trail Officer. Appropriate mitigation measures should be incorporated for any adverse impacts.

Biodiversity duty

Your authority has a [duty](#) to have regard to conserving biodiversity as part of your decision making. Conserving biodiversity can also include restoration or enhancement to a population or habitat. Further information is available [here](#).