Planning Statement

Application for planning permission: farm-based anaerobic digestion renewable energy facility, construction of vehicular access/road to A1307, associated infrastructure and landscaping

Land at Streetly Hall Farm, Streetly End, West Wickham

On behalf of Streetly Hall Farm

October 2023

CORNERSTONE
Planning
Limited

1. Proposed Development

Context

1.1 This Planning Statement has been prepared on behalf of Streetly Hall Farm, in support of an application for planning permission for the construction of a farm-based Anaerobic Digestion (AD) renewable energy facility, construction of vehicular access/road to A1307, associated infrastructure and landscaping, on land at Streetly Hall Farm, Streetly End, West Wickham.

1.2 A farm-based AD plant would facilitate long-term farm sustainability/viability, extend local/rural economic development, reduce the carbon footprint of local farms, and generate green energy as part of the UK's net zero strategy. Streetly Hall Farm is the applicant, but the project would be operated in conjunction with other local farms from which feedstock would also be sourced (see below).

1.3 The proposed facility will produce approximately 750 cubic metres per hour of biomethane for export to the gas grid (injected locally to the site; the gas main runs immediately to the south of the site), and is expected to process between 60,000 and 75,000 tonnes of feedstock per annum. The feedstock will be a mixture of agricultural waste and energy crops, with at least 50% being waste, to comply with the government's Green Gas Support Scheme.

Proposed Development

1.4 This planning application relates to the proposed construction and operation of an AD plant comprising the use of 11.17 hectares of agricultural (arable) land, including the existing farm track and new access road. [**Please note: additional landscaping and Biodiversity Net Gain proposals are included in this extended site; aside from landscape and ecology work/reports, the majority of other supporting information refers to a site of 7.55 hectares, which does not include this additional land.**] The proposed development would comprise the following principal elements of operational development:

- Creation of access from the A1307 approximately 200 metres west of Mill House;
- 2 silage clamps each measuring 112m x 25m;
- 2 silage clamps each measuring 112 x 21 metres;
- 3 fermenter tanks each with a diameter of 30 metres; height to top of wall = 8.0m; maximum dome height = 16.1m wall heigh and height of 16.1 metres including dome;
- Post fermenter tank with a diameter of 30 metres; height to top of wall = 8.0m; maximum dome height = 16.1m wall heigh and height of 16.1 metres including dome;
- Pre-storage tank with a diameter of 9 metres and height of 4 metres;
- Ferric chloride tank with a diameter of 3.79 metres and height of 4 metres;
- 3 pasteurisation tanks each with a diameter of 2.89 metres and height of 7 metres;
- Buffer tank with a diameter of 3.2 metres and height of 7.2 metres;

- External desulphurisation infrastructure comprising 2 tanks each with a diameter of 3.9 metres and height of 4.3 metres and a container measuring 6 x 2.2 metres x 3 metres high;
- Gas technology unit measuring 10 metres x 5 metres x 3.7 metres high;
- LV board and emergency generator measuring 6.2 x 4.6 x 2 metres high;
- Grid entry unit measuring 8 x 3 metres x 2.52 metres high;
- CHP unit measuring 9.6 x 6.27 metres x 4.59 metres high;
- Power to heat module measuring 9 x 3 metres x 2.8 metres high;
- 4 CO_2 tanks with a combined measurement of 21 x 13.10 metres x 3.4 metres high;
- 2 feed hoppers each measuring 4 x 14.6 metres x 4.7 metres high;
- Covered digestate storage lagoon (15,260m^3);
- Surface water lagoon (1,100m^3)
- Dirty lagoon (805m^3);
- CO_2 recovering unit measuring 11. 84 x 5.76 metres x 3.7 metres high;
- Gas upgrade unit measuring 11. 84 x 5.76 metres x 3.7 metres high;
- Feedstock storage building measuring 80 x 36 metres x 12.6 metres high;
- Straw barn measuring 50 x 20 metres x 11.6 metres high;
- CO_2 recovery system unit 11.84 metres x 5.76 metres x 3.7 metres high;
- Flare with a diameter of 2.2 metres diameter and height of 7.3 metres;
- Technical building measuring 4.34 metres x 4.34 metres x 3 metres high;
- Weighbridge office measuring 8 metres x 5 metres x 6.2 metres high;
- Weighbridge.

1.5 It is anticipated that the plant will utilise between 60,000 and 75,000 tonnes per annum (tpa) of agricultural waste and energy crops as feedstock. At least half of the feedstock will be agricultural wastes and residues such as straw, farmyard manure, slurry, and poultry litter; the remaining portion will be energy crops such as maize and wholecrop silage, or other agricultural products, such as sugar beet pulp. At least half of the feedstock is expected to be supplied by the applicant's and partner farming businesses from arable rotation and waste/residue production, and in combination at least 70% of feedstock will be sourced from farms within a 10km radius of the plant. Some plant traffic will not use the public highway at all; of that which does, more than 75% will utilise the A1307 access. Due to the direct link to the A1307, no plant-related traffic will need to pass through Horseheath.

Site and Access

1.6 The site of the proposed AD facility is to the north-west of the existing farm complex on Webb's Road, with access via the A1307 (new vehicular access/access road) and existing farm track through the farm to Webb's Road (See Figure 1). The application site (including revised access road) comprises 11.17 hectares.

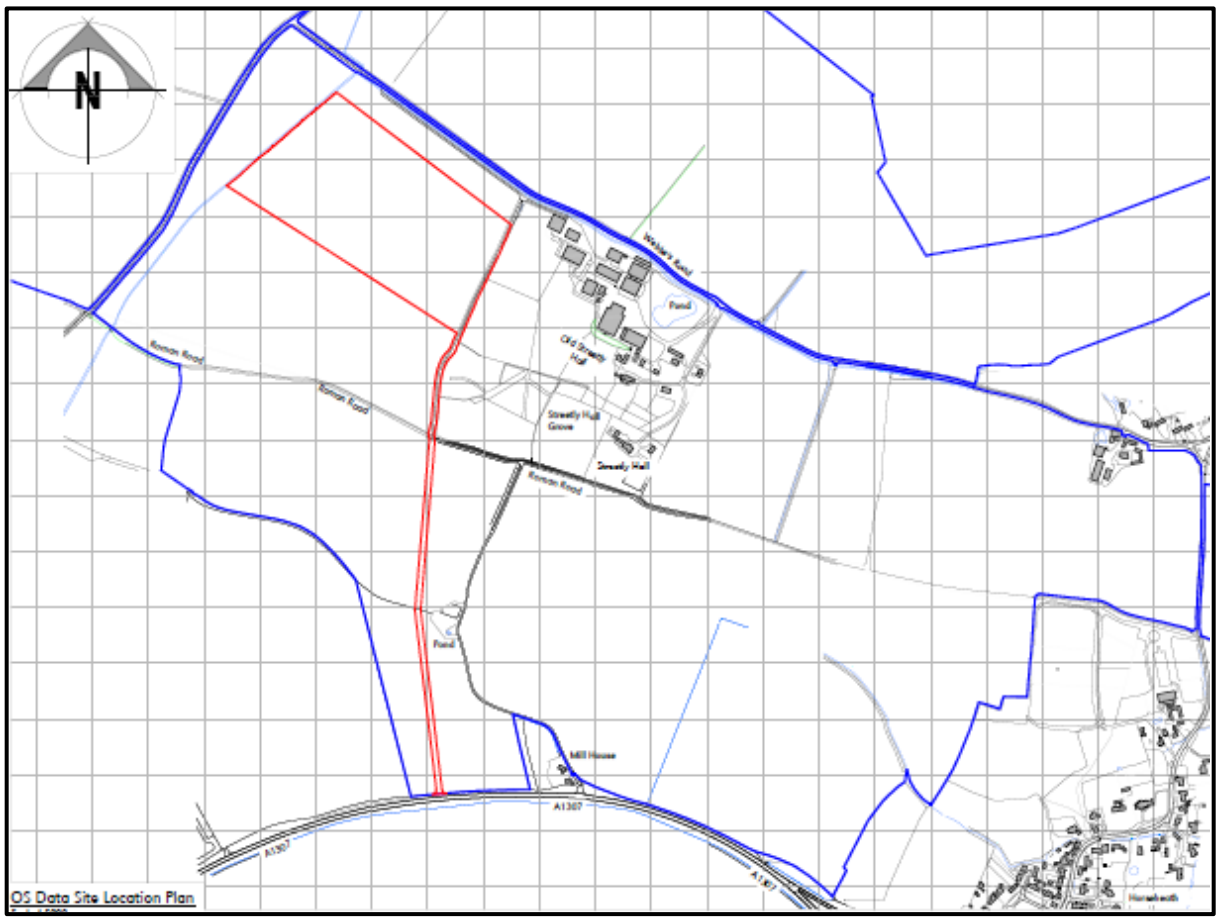

Figure 1: Site Location Plan

1.7 The proposed location for the AD plant has been given careful consideration. It is acknowledged that an AD plant would introduce a large feature into a rural landscape; the following have all been considered in seeking to identify the optimum location:

- Proximity to gas main;
- Proximity to feedstock sources;
- Proximity to existing farm buildings (visual);
- Elevation relative to the surrounding landscape;
- Distance from settlements/residences;
- Distance from designated ecological sites;
- Distance from designated heritage assets;
- Avoiding areas liable to flood;
- Avoiding traffic through settlements.

1.8 Following pre-application discussions in 2022 with Cambridgeshire County Council Transportation officers, it became apparent that planned works to the A1307/Dean Road junction would preclude some of the necessary movements thereon. Consequently,

advice was sought on an alternative approach – to form a new road, extending south of the existing farm road (that presently runs north-south along the eastern boundary of the proposed main plant site) with a new vehicular access directly south of the site, to/from the A1307. The application (red line) site is defined accordingly, and illustrated at Figure 1 (above). The new access would replace an existing and largely disused farm access some 200 metres to the east, onto the A1307.

1.9 The new access road crosses a PROW (an operational farm track), although there is no intention that the position or use of this be affected or altered in any way. The access road runs close to existing trees and so a tree survey and Arboricultural Impact Assessment has been undertaken to determine how any works close to the Root Protection Area should be managed.

1.10 It is expected that the new access road will not only be utilised for AD plant traffic but also that of the existing farming operation. Currently, agricultural machinery and farm HGV traffic access the A1307 along roads through the villages of Streetly End and Horseheath. The new access road represents a safer and less disruptive alternative by reducing heavy vehicle movements through these villages.

1.11 The layout and designs have evolved through various iterations (and in the context of pre-application consultation). The layout and plant have been designed to allow for efficient operation of the site, but also to seek to minimize visual and landscape impact.

1.12 The farm buildings closest to the site are cattle sheds which produce agricultural waste for the facility to process. The site is low lying and relatively well shielded from local residences.

Input – Feedstock

1.13 Streetly Hall Farm is 1,000 hectares farming business, working in partnership with a further 1,350 hectares and local straw producers covering over 2,000 hectares, and as such will supply more than half of the feedstock requirement for the AD facility from its own arable rotation and waste/residue production. The remaining portion of feedstock is expected to be further agricultural waste from local farms, but the plant may also receive waste from other sources, such as fruit and vegetables not entering the food system. Agricultural wastes and residues are principally expected to be farmyard manure, slurry, and straw. The operating farm area under the applicant's farming partnership with a neighbouring farmer is currently 2,500 hectares, of which 2,350 ha are jointly 'home farm'. The total AD plant feedstock will need to be sourced over an area of approximately 4,000 ha; the applicant can confirm that it is able to supply more than half of the respective feedstock and waste/residue portions from the area they farm directly alongside partner farmers and local straw pool (to address the provisions of MWLP Policy 4).

1.14 Figure 2 illustrates the primary feedstock locations (land owned by Streetly Hall Farm is shown green, and partner farm location also marked). It is anticipated that 70% of feedstock will be sourced with a 10km radius. Off-farm feedstock is expected to be delivered to the facility directly via the new A1307 access (south), and via the existing farm to/from Webb's Road/Dean Road (north).

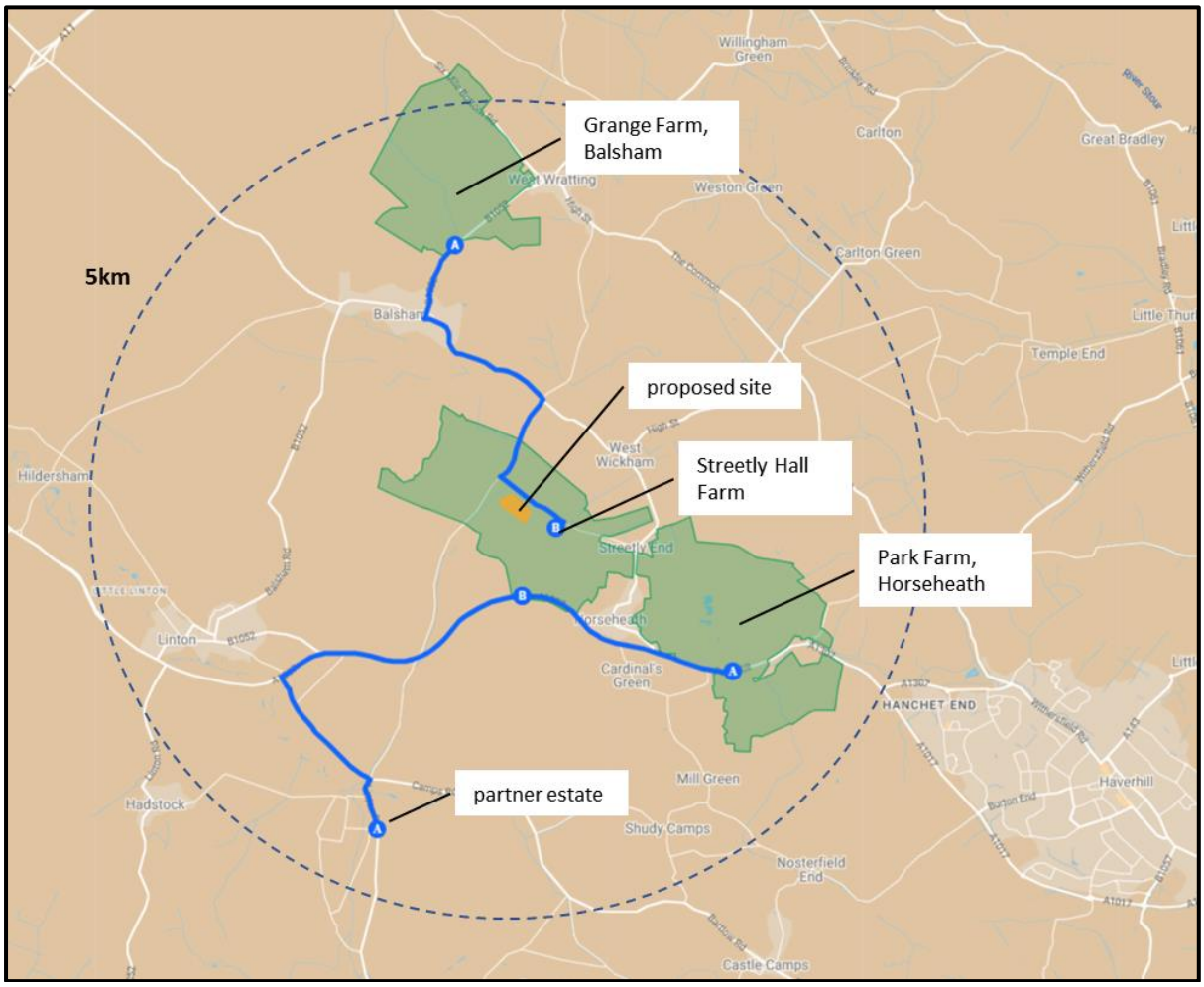

Figure 2: Feedstock Sources and Transport Routes

Output – Green Gas (Biomethane), Carbon Dioxide and Digestate

1.15 The AD facility will produce approximately 30,000m^3 of liquid digestate and 20,000 tonnes of solid digestate. The liquid digestate will be held in a purpose-built covered storage lagoon until the appropriate time, when it can be applied to arable land. The digestate will be either applied to the adjoining arable land via pipes or transported by tanker to other arable areas of the farm. It may also be converted to a solid fertiliser for application to the land alongside the solid digestate. Application of digestate will reduce the farm's use of fossil fuel-based fertilisers.

1.16 Biogas produced by the anaerobic digestion of the feedstock will be separated into biomethane and carbon dioxide (CO_2). The biomethane will be injected into the gas network at a point close to the facility, where an intermediate pressure (2-7 bar) gas pipeline runs. This green gas will contribute to the UK government's strategy to make the domestic gas supply less reliant on fossil fuel sources. CO_2 will be collected for use in the food industry or sequestration off-site, making the facility a carbon negative energy producer.

2. Anaerobic Digestion

2.1 Anaerobic Digestion (AD) involves the digestion of organic material in the absence of oxygen. AD is commonplace on farms across many European countries as it offers many environmental benefits for the treatment and utilisation of biomass crops and residues, as well as producing renewable energy in the form of methane-rich biogas. AD is recognised and supported by the Government, National Grid, DECC, Defra, Environment Agency, WRAP, REA, ADBA, Ofwat, Ofgem, NFU, CLA amongst others.

2.2 The plant would convert locally sourced biomass (purpose-grown crops) and farm waste and by-products like straw into biogas, which in turn is 'upgraded' to biomethane gas that is transferred directly into the local gas network. The upgrading process also captures renewable CO_2 for use in industry. Digestate remains from the process and is returned as organic fertiliser to farmland. This improves soil productivity, stores carbon in the soil and improves the yields of subsequent crops.

2.3 The growth of AD in the UK has been slow compared to that in mainland Europe, but since the introduction of the UK Government's Renewable Energy Strategy (2009) there has been a surge of interest from Government, industry and farmers as the UK has recognised the benefits of this process. The recently published Biomass Policy Statement (November 2021; Department for Business, Energy and Industrial Strategy) reinforces the role identified for biomass in the short to long term, as part of the Government's policy to accelerate the decarbonization of the UK economy across all sectors.

2.4 In addition to renewable, sustainable energy, AD plants also produce other important products such as carbon dioxide (CO_2) for commercial/ industrial uses, and digestate (a bio-fertiliser replacing conventional chem-fertilisers). The digestate from AD plants can be used to replace inorganic fertilisers, creating a closed loop nutrient cycle back to land. The digestate contains useful nutrients and can be used as a fertiliser and soil conditioner. This in turn reduces the risk of leaching and run off and so can prevent diffuse water pollution. By replacing inorganic mineral fertiliser - the production of which requires significant energy input - AD is also able to provide additional benefits in terms of reducing greenhouse gas emissions through CO_2 sequestration and additional carbon capture that already occurs when the organic matter within the digestate is applied to the soils.

2.5 Anaerobic Digestion is helping the UK meet several major challenges, principally climate change and energy security. The UK has committed to achieving a 100% reduction in greenhouse gas emissions below 1990/95 levels as outlined in the amended Climate Change Act 2008. The UK Government has put in place a new target that will require the UK to bring all greenhouse gas emissions to net-zero by 2050. To help meet this 2050 target the government introduced carbon budgets as part of the Climate Change Act 2008. The UK has already reduced emissions by 43% (2018, from 1990 levels) whilst growing the economy by 72% and has put clean growth at the heart of its modern Industrial Strategy. This could see the number of "green collar jobs" grow to 2 million and the value of exports from the low carbon economy grow to £170 billion a year by 2030.

2.6 The UK Low Carbon Transition Plan, published in July 2009, highlighted the importance of Anaerobic Digestion in tackling climate change by delivering clean, renewable energy. In addition to this, the 2011 Anaerobic Digestion Strategy and Action Plan published by the Coalition Government continues to promote the importance of continuing Anaerobic Digestion investment. Since the Anaerobic Digestion Strategy and Action Plan was published there has been an increase in energy produced from Anaerobic Digestion. In 2019 the Chancellor, in his budget statement, announced

further backing of the Anaerobic Digestion industry: *"we will publish proposals to require an increased proportion of green gas in the grid, advancing decarbonisation of our mains gas supply"*. Anaerobic Digestion is playing an increasing role in addressing the Government's commitment to the substantial growth of renewable energy's contribution to the UK's power supply, and to cut CO_2 emissions by 78% by 2035 (and net zero by 2050), It also supports increased security of energy supply over foreign fossil-fuel imports (as evidenced by the 300% price rise in natural gas this year).

2.7 Unlike other renewable energy technologies, Anaerobic Digestion can contribute to all three energy sectors (heat, power and transport) – especially those that have historically been difficult to decarbonize and perform worst in this regard (namely the agricultural sector, heat and transport fuels), and as such will be key in aiding the UK in achieving its goals. Anaerobic Digestion is already reducing the UK's greenhouse gas emissions by 1% annually. From the Anaerobic Digestion and Bioresources Association (Spring 2020): *"The AD industry has the potential to contribute 30% of the carbon savings required to meet the UK's 5th carbon budget, cutting carbon emissions by over 27 million tonnes of CO_2 every year, or 6% of today's emissions. It means that policies to support the sector will ultimately help Government fill the gap between its ambitious target and its current policies."*

2.8 UK farming has experienced a decline in Total Income from Farming (TIFF) during recent years and according to DEFRA these periods of volatility are likely to occur for the foreseeable future. The proposed scheme offers local farmers an opportunity to diversify their businesses with additional long-term stable income streams from the supply of feed to the plant, enhance and invest in their existing farm practices against secured income and reduce overheads/ costs through the recycling of digestate rather than imported chemical-fertilisers. Subsequently, this facility will make their businesses more robust to market pressures in an uncertain future, securing economic growth and associated jobs in the local rural economy.

<u>Economic and Operational Context</u>

2.9 New legislation – particularly the Reduction and Prevention of Agricultural Diffuse Pollution (England) Regulations 2018 (also known as the Farming Rules for Water) and the Clean Air Strategy 2019 - place an onus on farmers to store and more safely manage and dispose of manures and slurry generated, and to control the release of key polluting emissions (including ammonia).

2.10 In recent years, the beet harvest has become more variable through the banning of neonicotinoid pesticides and resulting impact of beet yellow virus – resulting in the UK Government allowing their use for beet only. This represents a risk to both the beet growers (who may find the pesticide banned again) and the environment – through its impact on bee colonies.

2.11 Through operation of a farm-based AD plant, Streetly Hall Farm and partners will:

- Utilise a source of carbon-negative sustainable fertiliser, greatly reducing dependence on synthetic fertiliser derived from fossil fuels
- Improve soil heath and sequester carbon
- Expand the options for arable break crops, mitigating weather and pest risk
- Provide a stable alternative market to local growers
- Make more effective use of crop residues and livestock waste

- Spread the harvest period over a wider portion of the year
- Reduce transport distances for wastes and residues

2.12 In recent times agriculture has been subject to an extremely high degree of volatility owing to:

- A shortage of European labour, post-Brexit;
- Economic uncertainty over the replacement of the Basic Payment Scheme;
- Unusually high inflation: manpower, fuel and gas prices have driven up costs;
- Fertiliser inflation – Nitrogen fertiliser rose from £300 per tonne to £800 per tonne in 2022;
- CO_2 shortages – along with labour shortages, impacting on slaughter houses – leaving farmers with stock they cannot sell;
- COVID-19 – further impacting on manpower availability – as agriculture is a peak demand industry (requiring significant seasonal labour volumes to meet harvest, picking and other seasons).

And that is in addition to the usual vagaries of the weather, pests and disease.

2.13 In addition to its numerous environmental and energy benefits, the AD plant at Streetly Hall is a significant economic benefit to the local economy:

- It will create 5 full time local jobs (operators must live close to the plant in order to be on-site at short notice);
- It will create a number of additional specialist jobs associated with the ongoing maintenance and technical/biological support of the plant (e.g., CHP/Gas Upgrader/Plant/Mobile Plant/Site maintenance, biological support/expertise, laboratory testing of samples – feed/digester/digestate – and so on);
- It will safeguard numerous agricultural jobs associated with the growing of crops, rearing of livestock and the logistics of such;
- It will provide much needed economic stability by offering long-term inflation linked prices for crops, straw, and other by-products;
- It will offset the cost of compliance with Farming Rules for Water Regulations and the Clean Air Strategy, by offering value to farmers for their manures and slurries (relative to the amount of gas they produce);
- It will reduce the massive impact of fertiliser cost increases by offering a local, organic alternative to NPK fertiliser in the form of both liquid and solid digestates, at hugely reduced prices;
- It will reduce the cost and impact of haulage by reducing road-miles, as materials are currently sent much longer distances to market;
- Production of UK green gas will reduce the UK's reliance on imported oil and gas by producing homegrown vehicle fuels, heat and power; and
- Finally, the plant will pay substantial Business Rates that will be invested in improving local services and infrastructure.

2.14 While the cost of buying such gas will be spread over every gas bill in the UK, the economic and environmental benefits will be concentrated in the local area. In short, unlike other 'renewables', Anaerobic Digestion provides a myriad of benefits that go far beyond just renewable gas, integrating seamlessly with local farming processes and adding economic and environmental benefits and stability at every stage of the supply chain.

Economic Context

2.15 The proposed renewable energy facility has the ability to provide a range of economic benefits locally and nationally. The facility will provide direct employment via:

- 5 on-site permanent employees to run and maintain the plant;
- Employment of local contractors, haulage and plant hire for construction of the facility;
- Employment of local farming contractors and logistics to manage feed and digestate to and from the facility;
- Landscaping, fencing and security supplies;
- Ongoing operational needs to employ local tradesmen for electrical, plumbing, construction and general maintenance requirements.

2.16 Indirect employment/service requirements during construction and commissioning, including:

- Local hospitality/accommodation;
- Catering and other facilities;
- Purchase and maintenance of local workforce vehicles;
- Taxi services.

2.17 The facility will also bring economic benefits by contributing to the Government's commitment to the substantial growth of renewable energy's contribution to the UK's power supply, and to cut CO_2 emissions by 78% by 2035 (and net zero by 2050). As well as providing increased security of energy supply over foreign fossil-fuel imports (as evidenced by the 300% price rise in natural gas last year). The local Council will also benefit directly through Business Rate contributions.

2.18 Local economic farming benefits will also accrue by offering farmers an opportunity to grow financially viable break/cover/catch crops within existing rotations, delivering stable, long-term returns; and displace the cost of chemical fertilisers which fluctuated between £300 and £800 per tonne in 2021. UK farming has experienced a decline in Total Income from Farming (TIFF) during recent years by over 6% and according to DEFRA these periods of volatility are likely to occur over the foreseeable future. This type of diversification development will assist in addressing that decline and allow local farmers to be compliant with recent legislation on the management of slurries and manures; and to be able to make long-term stable plans on the basis of local markets for their produce and by-products.

2.19 The application is supported by the following information (Table 1):

Table 1: Application Documents

Drawing/Report	Consultant
Site Location Plan	Plandescil
Layout Plan	Plandescil
Topographical Survey	Plandescil
Detailed plans of plant, elevations, sections	Plandescil
Site survey/ground investigation	Howlands
Groundwater Risk Assessment	RSK
Tree Survey/AIA	Norfolk Wildlife Services
Construction Environmental Management Plan	Plandescil
Construction Traffic Management Plan	Plandescil
Planning Statement/Statement of Community Involvement	Cornerstone Planning
Health Impact Assessment	Cornerstone Planning
Statement of Sustainable Design & Construction	Cornerstone Planning
Landscaping Proposals	Broom-Lynne
Landscape & Visual Assessment	Broom-Lynne
Transport Statement	Plandescil
Noise Assessment	Professional Consult
Odour Assessment	Redmore Environmental
Air Quality Assessment	Redmore Environmental
Preliminary Ecological Appraisal + Biodiversity Net Gain Assessment	Norfolk Wildlife Services
Archaeological Desktop Assessment/Heritage Statement	GHC Heritage
Flood Risk Assessment and Drainage Strategy	Plandescil

3. Planning Policy Context

Introduction

3.1 Section 38(6) of The Planning and Compulsory Purchase Act 2004 requires that decisions on planning applications must be made in accordance with the adopted Development Plan unless material considerations indicate otherwise. This is reinforced by the National Planning Policy Framework (NPPF).

Development Plan

3.2 **Assessment and Evaluation**

Planning Policy Context

3.3 For the purposes of this application, the Development Plan comprises the Cambridgeshire and Peterborough Minerals and Waste Local Plan (adopted July 2021), and the South Cambridgeshire Local Plan (adopted September 2018).

3.4 Also of relevance are: the Cambridgeshire Flood and Water SPD (2016); Health Impact SPD (2011); Landscape in New Development SPD (2010); Greater Cambridgeshire Sustainable Design and Construction SPD (2020); and Greater Cambridgeshire Biodiversity SPD (2022). The Government's National Planning Practice Guidance is also of relevance. These are material considerations in determining applications for planning permission and have been considered in the preparation of the accompanying proposals.

3.5 Section 38(6) of The Planning and Compulsory Purchase Act 2004 requires that decisions on planning applications must be made in accordance with the adopted Development Plan unless material considerations indicate otherwise. This is reiterated in the National Planning Policy Framework.

National Planning Policy Framework (July 2021)

3.6 The revised National Planning Policy Framework (NPPF) was published in September 2023 and is a material consideration of significant weight. The NPPF sets out the Government's planning policies for England and how these are expected to be applied. It is a significant material consideration in planning decisions. In the context of this application the following paragraphs are of particular relevance to its determination:

- Sustainable Development: paragraphs 7-12;
- Determining Applications: paragraphs 47;
- Supporting a Prosperous Rural Economy: paragraphs 84 and 85;
- Promoting Sustainable Transport; paragraphs 110-112;
- Achieving Well-designed Places: paragraphs 126-135;
- Meeting the Challenge of Climate Change, Flooding and Coastal Change: paragraphs 152 - 158;
- Conserving and Enhancing the Natural Environment; paragraphs 174-182;
- Health/Amenity: paragraph 185;
- Conserving and Enhancing the Historic Environment: paragraphs 194-208.

National Planning Policy Guidance

3.7 The National Planning Policy Guidance (NPPG) was first published online in March 2014 and is a material consideration in planning decisions. In the context of these proposals, the following are considered to summarise the relevant guidance:

Renewable and Low-Carbon Energy: *"Planning has an important role in the delivery of new renewable and low carbon energy infrastructure in locations where the local environmental impact is acceptable"*. (Paragraph 05-001 - 20140306)

Development Plan

3.8 A summary of relevant Development Plan policies is set out below in Table 2.

Table 2: Relevant Development Plan policies

Cambridgeshire and Peterborough Minerals and Waste Local Plan (2021)
Policy 1 – Sustainable Development and Climate Change
Policy 3 – Waste Development Needs
Policy 4 - Providing for Waste Management
Policy 5 – Mineral Safeguarding Areas
Policy 17 - Design
Policy 18 – Amenity Considerations
Policy 20 - Biodiversity and Geodiversity
Policy 21 – The Historic Environment
Policy 22 – Flood and Water Management
Policy 23 – Traffic, Highways and Rights of Way
Policy 24 – Sustainable Use of Soils
Appendix 3 – The Location and Design of Waste Management Facilities
South Cambridgeshire Local Plan (2018)
Policy S/7 – Presumption in Favour of Sustainable Development

Policy S/7 – Development Frameworks
Policy CC/1 – Mitigation and Adaptation to Climate Change
Policy CC/2 – Renewable and Low Carbon Energy Generation
Policy CC/4 - Water Efficiency
Policy CC/6 – Construction Methods
Policy CC/7 – Water Quality
Policy CC/8 – Sustainable Drainage Systems
Policy CC/9 – Managing Flood Risk
Policy HQ/1 – Design Principles
Policy NH/2 – Protecting and Enhancing Landscape Character
Policy NH/3 – Protecting Agricultural Land
Policy NH/4 – Biodiversity
Policy NH/5 – Sites of Biodiversity or Ecological Importance
Policy NH/14 – Heritage Assets
Policy SC/2 – Health Impact Assessment
Policy SC/9 – Lighting Proposals
Policy SC/10 - Noise Pollution
Policy SC/12 – Air Quality
Policy SC/14 – Odour and Other Fugitive Emissions to Air
Policy TI/2 – Planning for Sustainable Travel

Other Material Considerations

3.9 Aside from the NPPF, the principal material consideration is considered to be the National Planning Practice Guidance - updated regularly - insofar as it addresses matters concerning renewable energy/climate change, transport, noise, amenity, landscape, conserving and enhancing the historic environment and the natural environment.

3.10 Other relevant Government planning and renewable energy policy to be considered in the preparation and determination of the application include:

- The UK Renewable Energy Strategy – 2009;
- The UK Low Carbon Transition Plan – National Strategy for Climate and Energy – 2009;
- UK Biomass Strategy – 2007;
- UK Bioenergy Strategy – April 2012 (DoT/DECC/DEFRA);
- Anaerobic Digestion Strategy and Action Plan - June 2011 (DEFRA/DECC);
- Climate Change Act – 2008;
- Planning Act - 2008;
- The Energy Act - 2013;
- The EU Renewable Energy Directive (2009/28/EC);
- Biomass Policy Statement (November 2021).

4. Statement of Community Involvement

4.1 In accordance with S.122 of the Localism Act 2011 and the Council's adopted Statement of Community Involvement (2019), the applicants have consulted with the local community, together with statutory and other consultees, and the District and County Councils.

4.2 Paragraph 39 of the NPPF encourages pre-application consultation/engagement, noting: *"Early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Good quality*

preapplication discussion enables better coordination between public and private resources and improved outcomes for the community."

4.3 Paragraph 40 notes that Local Planning Authorities: *"….should also, where they think this would be beneficial, encourage any applicants who are not already required to do so by law to engage with the local community and, where relevant, with statutory and non-statutory consultees, before submitting their applications".*

4.4 Paragraph 126 indicates that: *"Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process."*

4.5 Paragraph 133 states that: *"Local planning authorities should ensure that they have access to, and make appropriate use of, tools and processes for assessing and improving the design of development. These include workshops to engage the local community, design advice and review arrangements, and assessment frameworks such as Building for Life. These are of most benefit if used as early as possible in the evolution of schemes, and are particularly important for significant projects such as large scale housing and mixed use developments."*

4.6 The process of pre-application consultation commenced with a request for (first stage) pre-application advice from Cambridgeshire County Council in April 2022, followed by a second stage pre-application enquiry in January 2023. Over this period, further, topic-specific pre-application enquiries were undertaken by consultants with Council officers and statutory undertakers relating to – inter alia – ecology, landscape, highways, flood risk/drainage, heritage/archaeology, and public rights of way.

4.7 In addition, the applicant met and consulted with West Wickham and Horseheath Parish Councils, local residents, and the Friends of the Roman Road group - pre-application - to present the application proposals and seek feedback, as follows:

<u>Horseheath Parish Council meeting – 15 May 2023</u>

- Details of the proposals were shared in a document prior to the meeting;
- An overview of the plans was presented at the meeting and questions answered from councillors and public attendees;
- The councillors were not able to make comments as the planning application had not yet been submitted.

<u>West Wickham Parish Council meeting - 22 May 2023</u>

- Details of the proposals were shared in a document prior to the meeting;
- An overview of the plans was presented at the meeting and questions answered from councillors and public attendees;
- Points of discussion included:
  - Works access for construction – how this would be managed;
  - Some concerns about the access road crossing the Roman Road, they suggested the applicant contact Friends of the Roman Road
  - New access road alleviating traffic in Streetly End and Horseheath.
- The councillors were not able to make comments as the planning application had not yet been submitted.

<u>Friends of the Roman Road (FoRR): visit site/walk along affected section - 01 June 2023</u>

- Details of the proposals were shared in a document prior to the meeting;

- Discussed the possible plant location options either side of the Roman Road and why the proposed site had been selected;
- Plans were shared of mitigation measures for biodiversity and visual impact;
- Suggestions were made by FoRR regarding Roman Road surface and contact shared.

4.8 The feedback from this process led to changes in the form of the application – including layout/design and access – hereby submitted.

5. Evaluation and Assessment

5.1 The following sections provide an assessment of the planning policy context, and other matters relevant to the determination of the application, including the assessments and reports which accompany it, evaluating the proposed development against the Development Plan and other relevant material considerations.

The Principle of Development

5.2 Section 38 of The Planning and Compulsory Purchase Act 2004 ('The 2004 Act') indicates that the determination of planning applications must be in accordance with the approved development plan unless material considerations indicate otherwise.

5.3 The UK is legally bound by the Climate Change Act (2008) to cut greenhouse gas emissions by 80% by 2050, compared to 1990 levels. The proposed AD plant development would contribute towards meeting this requirement, supported by energy policy given that it would introduce new energy infrastructure supporting the move to a low carbon economy.

5.4 Pursuant to the 2008 Act, the NPPF offers significant support for renewable energy development and places an overriding emphasis on the presumption in favour of sustainable development, which these application proposals comprise. Supporting infrastructure, which is required to ensure the generation of renewable energy, is inherently sustainable under the NPPF.

Waste Policy and Waste Hierarchy

5.5 There exists a range of policy and targets which seek to deliver and manage the most sustainable approach to waste management, and in doing so protect the environment. These include the revised Waste Framework Directive 2008/98/EC, which has been transposed into English legislation through the Waste (England and Wales) Regulations 2011, together with national policy on waste set out within the Waste Management Plan for England (2021). The EU Withdrawal Act 2018 maintains established environmental principles and ensures that existing EU environmental law will continue to have effect in UK law. The Waste Management Plan for England (2021) focuses on waste arisings and their management. It is a high-level, non-site-specific document and sets out the Government's ambition to work towards a more sustainable and efficient approach to resource use and management.

5.6 In England, the waste hierarchy is both a guide to sustainable waste management and a legal requirement, enshrined in law through the Waste (England and Wales) Regulations 2011. The waste hierarchy ranks options for waste management giving priority to preventing the creation of waste in the first place, followed by preparing waste for reuse, recycling and then recovery including by incineration where there is energy recovery. Disposal – in landfill, or incineration without energy recovery – is regarded as the worst option.

5.7 The 2011 Regulations require those involved in waste management and waste producers in England (and Wales) to, on the transfer of waste, take all reasonable measures to apply the priority order in the waste hierarchy except where for specific waste streams departing from the priority order is justified by lifecycle thinking on the overall effects of generating and managing the waste.

5.8 Paragraph 4 of the NPPF states that the NPPF should be read in conjunction with the Government's planning policy for waste, the National Planning Policy for Waste. Paragraph 1 of the NPPW includes the following as playing a role in delivering the country's waste ambitions through:

- delivery of sustainable development and resource efficiency, including provision of modern infrastructure, local employment opportunities and wider climate change benefits, by driving waste management up the waste hierarchy;
- ensuring that waste management is considered alongside other spatial planning concerns, such as housing and transport, recognising the positive contribution that waste management can make to the development of sustainable communities;
- providing a framework in which communities and businesses are engaged with and take more responsibility for their own waste, including by enabling waste to be disposed of or, in the case of mixed municipal waste from households, recovered, in line with the proximity principle;
- helping to secure the re-use, recovery or disposal of waste without endangering human health and without harming the environment; and
- ensuring the design and layout of new residential and commercial development and other infrastructure (such as safe and reliable transport links) complements sustainable waste management, including the provision of appropriate storage and segregation facilities to facilitate high quality collections of waste.

5.9 Paragraph 7 states that when determining planning applications, waste planning authorities should:

- only expect applicants to demonstrate the quantitative or market need for new or enhanced waste management facilities where proposals are not consistent with an up-to-date Local Plan. In such cases, waste planning authorities should consider the extent to which the capacity of existing operational facilities would satisfy any identified need;
- recognise that proposals for waste management facilities such as incinerators that cut across up-to-date Local Plans reflecting the vision and aspiration of local communities can give rise to justifiable frustration, and expect applicants to demonstrate that waste disposal facilities not in line with the Local Plan, will not undermine the objectives of the Local Plan through prejudicing movement up the waste hierarchy;
- consider the likely impact on the local environment and on amenity against the criteria set out in Appendix B [see below] and the locational implications of any advice on health from the relevant health bodies. Waste planning authorities should avoid carrying out their own detailed assessment of epidemiological and other health studies;
- ensure that waste management facilities in themselves are well-designed, so that they contribute positively to the character and quality of the area in which they are located;
- concern themselves with implementing the planning strategy in the Local Plan and not with the control of processes which are a matter for the pollution control

authorities. Waste planning authorities should work on the assumption that the relevant pollution control regime will be properly applied and enforced;
- ensure that land raising or landfill sites are restored to beneficial after uses at the earliest opportunity and to high environmental standards through the application of appropriate conditions where necessary.

5.10 Appendix B of the NPPW states that in determining planning applications, waste planning authorities should consider the following factors:

a. protection of water quality and resources and flood risk management;
b. land instability;
c. landscape and visual impacts;
d. nature conservation;
e. conserving the historic environment;
f. traffic and access;
g. air emissions, including dust;
h. odours;
i. vermin and birds;
j. noise, light and vibration;
k. litter;
l. potential land use conflict.

5.11 Relevant policies of the Development Plan are summarised in Table 1, above, and assessed under various topics/issues, below.

The Principle of Proposed Development

5.12 The purpose of the proposed development (farm-based AD plant) is to use agricultural waste and energy crops to generate energy (biomethane). The digestate by-product would be used on land as fertiliser. The process would result in little or no waste; CO_2 would be captured and stored before being utilised off site. Energy from waste (EfW) is a type of recovery which is below prevention, preparing for re-use and recycling but above disposal in the waste hierarchy, as shown in Appendix A of the NPPW. The applicant therefore believes that the proposed, farm-based AD development would be consistent with the broad national planning (and waste planning) policy aims: re-use and energy recovery, promoting sustainable development and the generation of renewable energy, and would be in accordance with the broad aims of MWLP Policy 1 and SCLP Policy S/3, Policy CC/1 and Policy CC/2.

5.13 MWLP Policy 3 deals with waste management needs. No site-specific allocations for new waste management facilities have been identified in the Local Plan. Policy 3 states that:

"The net capacity figures in the table above are not ceilings for recycling, treatment or recovery of waste. As such, proposals will, in principle (and provided they are in accordance with Policy 4: Providing for Waste Management), be supported if any of the following scenarios apply:

(a) it would assist in closing a gap identified in the table, provided such a gap has not already been demonstrably closed; or
(b) it would assist in closing a new gap identified in the future, with such identification to be set out in the annual monitoring of the Plan; or
(c) it moves waste capacity already identified in the above table up the waste hierarchy."

5.14 Addressing these in turn in the context of this planning application:

(a) The table in Policy 3 shows that for treatment and energy recovery processes [which includes AD] (Mixed – Municipal, C&I) there is currently a capacity surplus of 124,000 tpa (159,000 tpa if permitted but not yet operational capacity comes on line); by 2026 this would be 23,000 tpa (598,000 tpa) and by 2031 there would be a capacity gap of 57,000 tpa (surplus of 518,000 tpa) which would be a 80,000 tpa gap (495,000 tpa surplus) by 2036. The proposed AD plant would thus contribute to the objectives of Policy 3 (a);
(b) Not applicable;
(c) Currently, straw is either reapplied to the soil to decompose, used for livestock bedding, or transported 48 kilometres to the Ely power station (EPR), where it is burned to generate electricity. However, the vast majority of proposed feedstock - the farm manure, slurry, and poultry litter - is presently just returned to the land. Commonly, other agricultural wastes (such as fruit/vegetable matter) are composted, releasing greenhouse gases. Farmyard manure, slurry, chicken litter and other livestock waste is typically applied directly to the soil during months when regulations allow, and when weather conditions are appropriate. This releases greenhouse gases and odour, which if fed into the AD plant would be captured instead.

5.15 Much of the farm waste to be utilised by the AD plant for energy production is currently disposed of. That which is not, and which is utilised for energy production (straw), is done so by a significantly less efficient and more polluting means in a straw-fired power station some distance away from where the waste is generated. Via these application proposals, a significant majority is to be moved up the waste hierarchy (recovery – including AD - from disposal). In doing so it creates environmental benefits to waste management, and broader environmental benefits arising from renewable energy, reducing carbon emissions, and returning beneficial digestate to the soil options (and thus the reduction in artificial fertiliser use).

5.16 Paragraph 3.41 of the MWLP states that: *"However, the Plan's indicative capacity needs do not form a ceiling; where justified and in line with the wider aims and policies of this plan the Councils would be supportive of opportunities for additional capacity to be approved for a range of waste management methods where this will drive waste up the waste management hierarchy."* This planning application would thus create additional capacity for 'other recovery' in enabling the use of feedstock (including waste) to generate renewable energy and digestate to return to the land as soil improver (as indicated above).

Location of Proposed Development

5.17 MWLP Policy 4 sets out a broad spatial strategy for the location of new waste management development which starts by directing proposals to suitable sites within the settlement boundaries of the main urban areas. It does recognise that waste development on other sites may be appropriate and states that: *"New waste management proposals that are unable to demonstrate benefits of colocation under part 2 of this policy, that are within the planning permission boundary of existing waste management sites (i.e. where extensions to the site area is not required) that already operate outside of the main settlements identified in the locational criteria above will, in principle, be supported. Each case will be considered on its own merits and will be assessed against all the policies within the Development Plan."*

5.18 The proposed AD plant at Streetly Hall Farm would be a single waste management process - created specifically to process and manage farm waste generated on or near this farm - and would not be operated alongside any other waste management process.

Consequently, benefits of co-location cannot be demonstrated: the proposed development site is not an existing waste management site.

5.19 NPPF paragraph 84 gives support to the growth and expansion of businesses in rural areas. The site is outside the development frameworks for West Wickham and Horseheath. SCLP Policy S/7 states that:

"Outside development frameworks, only allocations within Neighbourhood Plans that have come into force and development for agriculture, horticulture, forestry, outdoor recreation and other uses which need to be located in the countryside or where supported by other policies in this plan will be permitted."

5.20 It is necessary to consider whether the proposed AD plant would be a use which needs to be located in the countryside and MWLP Policy 4 deals with waste management facilities in rural areas. It states: *"Only waste management facilities which are located on a farm holding, and where the proposal is to facilitate agricultural waste recycling or recovery (the majority of which is generated by that farm holding) will, in principle, be supported. Outdoor composting proposals which require the importation of waste material will be determined in accordance with wider policies of the Development Plan."*

5.21 The proposed AD plant would be located on a farm holding. At least 50% of the proposed feedstock would comprise waste, principally farmyard manure, slurry and straw, with potentially some other agricultural waste (e.g. poultry litter or food processing waste such as fruit or vegetables not entering the food system). The balance would be farm-grown energy crops. A minimum of half of the feedstock would be supplied by the applicant's farm, and partner farming businesses in the immediate vicinity. The farm thus forms the most sustainable location for the AD plant. Within the farm itself, further location assessment has been undertaken to identify the best and most sustainable location for the plant; these include:

- Proximity to gas main;
- Proximity to feedstock sources;
- Proximity to existing farm buildings (visual);
- Elevation relative to the surrounding landscape;
- Distance from settlements/residences;
- Distance from designated ecological sites;
- Distance from designated heritage assets;
- Avoiding areas liable to flood;
- Avoiding traffic through settlements.

5.22 These factors are assessed, weighed, and appraised elsewhere in this statement. Notwithstanding, it is therefore apparent that these proposals would comply with the Waste Management Facilities – Rural Areas part of MWLP Policy 4. Policy 4 provides support where a proposal falls within one of the subheadings in the second half of the policy and does not need to meet the criteria of another.

Sustainable Development

5.23 The NPPF introduces a clear and unequivocal presumption in favour of sustainable development, requiring that development proposals be approved where they accord with the Development Plan, unless material considerations indicate otherwise. Key Development Plan policies include: MWLP Policy 1 (Sustainable Development and Climate Change), and Policy S/7 (Presumption in Favour of Sustainable Development) of the SCLP.

5.24 The application proposals are, in themselves, sustainable development in that they propose the development of a renewable energy facility, the impacts of which would not significantly or demonstrably outweigh its benefits. The application and its supporting material, together with the remainder of this Planning Statement, demonstrate that these development proposals accord with the NPPF and the policies of the Development Plan.

Sustainable Energy and Climate Change

5.25 Key Development Plan policies include: MWLP Policy 1 (Sustainable Development and Climate Change), and Policies CC/1 (Mitigation and Adaption to Climate Change) and CC/2 (Renewable and Low Carbon Energy Generation) of the SCLP. Also material are, inter alia: the NPPF; the UK Renewable Energy Strategy (2009) the UK Low Carbon Transition Plan (2009) and the Biomass Policy Statement (November 2021; Department for Business, Energy and Industrial Strategy).

5.26 The NPPF and other Government (energy) policy make it clear that planning has a key role to play in combating climate change and creating an attractive environment for innovation and for the private sector to bring forward investment in renewable and low-carbon technologies, thereby helping the UK meet its international commitments and targets for greenhouse gas emissions, including CO_2.

5.27 Within this context, the application proposals are for a 7MW biomass-fuelled renewable energy facility. The plant will produce up to 60,000MWh of renewable energy (biomethane) from local biomass, sufficient energy (based on an average household consumption of 12 MWh/annum) to serve around 5,000 homes. Total CO_2 emissions saved (based upon a CO_2 output from burning gas of 0.185 kg/kWh) would be 9,250,000 kg of CO_2 per annum.

5.28 The proposed CO_2 recovery plant (not part of the 2015 scheme) would also produce an estimated 8,000 tonnes of CO_2 in liquid form; as a by-product of the anaerobic digestion process, carbon dioxide will now be captured, processed (liquified) and distributed to manufacturing industry (food, drink, cement, etc.). In recent times, production of certain food, drink and other products was compromised due to national carbon dioxide shortages. The plant will help alleviate some of the UK's supply issues for a gas that is critical in so many industries. This process displaces the use of fossil fuels with sustainably-produced green gas**,** reducing the net flow of CO_2 (there are no atmospheric emissions from this part of the process) to the atmosphere and capturing all the by-product of the process. This is the equivalent of removing:

- 1,500 cars each year from UK roads; or
- 18,000,000 road car miles per year.

5.29 It is apparent that the proposed development represents an innovative renewable energy technology and is thereby consistent with the sustainable energy, climate change and

environmental objectives of Development Plan policy, national planning and renewable energy policy. Subject to it meeting the environmental and amenity policy requirements of local and national policies (which the remainder of this report demonstrates), then the development accords with relevant planning and related policies. The development proposals also reflect and provide for the three dimensions to sustainable development cited in the NPPF (paragraph 8).

Design

5.30 The NPPF and policies of the Development Plan indicate that good design is a key component of sustainable development Policies concerned with design and design quality include MWLP Policies 1 (Sustainable Development and Climate Change), 17 (Design) and Appendix 3 (The Location and Design of Waste Management Facilities); together with SCLP policies CC/1 (Mitigation and Adaption to Climate Change), CC/4 (Water Efficiency) and HQ/1 (Design Principles).

5.31 The policies broadly seek to ensure that new development is well-designed, accounting for its location, and informed by sustainability. Other than MWLP Policy 17, these policies are intended to cover a wide range of types of development so not all elements are directly relevant to these application proposals.

5.32 Appendix 3 of the MWLP provides guidance specifically related to waste management facilities. In rural locations it recommends that the design of facilities should reflect the scale and design of agricultural buildings. MWLP Policy 17 states that:

> *"All waste management development, and where relevant mineral development, should secure high quality design. The design of built development and the restoration of sites should be sympathetic to and, where opportunities arise, enhance local distinctiveness and the character and quality of the area in which it is located. Permission will be refused for development of poor design that fails to take the opportunities available to achieve this."*

5.33 This is further developed in MWLP Appendix 3: The Location and Design of Waste Management Facilities. The SCLP has a number of requirements relating to sustainable design set out in policies CC/1, CC/4, HQ/1. These are addressed separately in the Statement of Sustainable Design and Construction.

5.34 The application site (red line) - including access road to the A1307 road - occupies a site of 11.17 hectares. The main part of the application site (AD plant) comprises some 6.7 hectares. The principal structures and their dimensions are set out in paragraph 1.4, above. As indicated above, careful consideration has been given to the location of the AD plant with Streetly Hall Farm:

- Proximity to gas main;
- Proximity to feedstock sources;
- Proximity to existing farm buildings (visual);
- Elevation relative to the surrounding landscape;
- Distance from settlements/residences;
- Distance from designated ecological sites;
- Distance from designated heritage assets;
- Avoiding areas liable to flood;
- Avoiding traffic through settlements.

5.35 From a design perspective, location close to an existing group of large farm buildings would aid visual association thereto. There is also some natural vegetation to soften landscape impact, and setting the structures within a slope makes use of topography to minimize visibility from some directions. Nevertheless, it is acknowledged that the application proposals represent the introduction of a significant group of structures/buildings into the countryside and the design team has sought - and adapted, in the light of pre-application consultation – to design the layout and individual components of the proposed plant to minimize visual and landscape impacts.

5.36 The layout is shown on the accompanying plan (Ref. 27951/007 Rev. N). It represents a generally standard layout for this type of development, largely dictated by operational requirements. Nevertheless, it has been designed to take advantage of topography, existing and proposed landscape features (agricultural buildings and natural vegetation) and new proposed features (earth bunding and additional planting) to aid integration into the wider landscape.

5.37 The form and appearance of the structures and plant are largely influenced by function. Nevertheless, attempts have been made – in revising the layout/configuration – to make the structures visually interesting whilst acknowledging their utilitarianism and agricultural setting. Careful consideration has been given to the policy advice – above - regarding waste and other development in the countryside, contained within policies of the Development Plan, in particular the siting and materials of such buildings. The majority of the structures are to be finished in a dark green colour or pale grey. However, the applicant is content to consider alternative colour finishes in liaison with the LPA. The matt finish to the structures/plant will avoid potential impacts due to glare or reflections and blend into the rural landscape, supplemented by new landscaping (see below).

Landscaping

5.38 A comprehensive landscape scheme has been developed as a component of the design process, and which responds to the existing landscape structure, the new development, topography, and viewpoints. The key landscape proposals are as follows:

- 10 metre-wide tree belt around the site, widened on the northern and western boundaries. Total area 1.97 hectares;
- Woodland block close to the visually-sensitive junction of Dean Road and the Harcamlow Way footpath. Total area 2333m²;
- Arable field to the north and west converted to meadow. Total area 3.65 hectares;
- Hedgerow on the outside of the tree belt and in-filling the hedge on Webb's Road. Total length 1105m;
- Hedgerow alongside the new access road. Total length 1426m;
- Gaps in hedgerow along Harcamlow Way in-filled.

5.39 Proposed landscape mitigation is illustrated on the submitted 'Landscaping Proposals' Plan (ref. 2022-444-013 Rev G) Extract at Figure 3, below.

Land Issues

Agricultural Land

5.40 The sustainable use of soils is addressed in the NPPF (paragraph 174 (b)), Policy 24 (Sustainable Use of Soils) of the MWLP, and Policy NH/3 (Protecting Agricultural Land) seek to protect the best and most versatile agricultural land. Policy 24 states:

"Mineral or waste development which adversely affects agricultural land categorised as 'best and most versatile' will only be permitted where it can be shown that:
(a) it incorporates proposals for the sustainable use of soils (whether that be off-site or as part of an agreed restoration scheme); and
(b) (for non-allocated sites) there is a need for the development and an absence of suitable alternative sites using lower grade land has been demonstrated."

5.41 It is acknowledged that the proposed development site is within a wide area of mostly Grade 2 agricultural land, which in planning terms is considered to be best and most versatile. The locational factors/necessities behind the selection of the application site are explained elsewhere; location of the plant anywhere else on Streetly Hall Farm would necessitate some loss of Grade 2 land; there is little or no land of lower grades that would serve the applicant's farm businesses for the purpose intended. There is no suitable, alternative site that addresses or satisfies the location criteria identified. In any event, the application would result in the direct loss of just 6.7 hectares of farm land (when accounting for the fact that part of the application site is existing farm track). Additional land would also be lost to agriculture; it would not be developed but set aside for landscaping and habitat creation.

Mineral Safeguarding

5.42 The proposed development site is within a designated Mineral Safeguarding Area (MSA) for chalk. MWLP Policy 5 seeks to protect mineral resources of current or future value from being sterilised by non-mineral development. Policy 5 states that (inter alia):

"Development within MSAs which is not covered by the above exceptions will only be permitted where it has been demonstrated that:
(i) the mineral can be extracted where practicable prior to development taking place; or
(j) the mineral concerned is demonstrated to not be of current or future value; or
(k) the development will not prejudice future extraction of the mineral; or
(l) there is an overriding need for the development (where prior extraction is not feasible)."

5.43 Chalk is the bedrock and at the proposed development site is not, according to the British Geological Survey Geology of Britain viewer, overlain by superficial deposits. It would not therefore be anticipated that the soil on the proposed development site would be deep, and therefore any excavation to construct buildings or infrastructure partially below the existing ground level would be mostly chalk.

5.44 The areas to be safeguarded as shown on mineral resources map that is referred coincide exactly with the tracts of superficial soil of generally granular character that are mapped by the BGS in the area. This mapping takes no account of the thickness of the unit and the precise grading of the soils within those units that would make them commercially viable. The soil investigation undertaken has shown the superficial unit, in this case the 'Seaford Chalk formation and Lowestoft Formation' to be variable in thickness and is highly unlikely to be a saleable product if extracted. Material testing and soil testing has been undertaken as part of the investigation and found the material to be of poor structureless quality. Notwithstanding the impact on the flood risk assessment, if there is a workable deposit then there could be some commercial benefit to realise this before the AD Plant is constructed. However, the results suggest that anything recovered would be of limited value other than as a low-quality general fill. Use of arisings from site groundworks could be used for such benefit and thus off-set any arguments that it should constitute waste.

5.45 The above therefore demonstrates compliance with the provisions of MWLP Policy 5, as indicated above.

Flood Risk and Surface Water Drainage

5.46 There are a range of policies concerned with the need to address the flood risk of new development and the protection of surface and ground water. Namely: the NPPF and its Technical Guidance; Policies 1 (Sustainable Development and Climate Change) and 22 (Flood and Water Management) of the MWLP; and Policies CC/1 (Mitigation and Adaption to Climate Change) and CC/9 (Managing Flood Risk). These policies seek to ensure that the sequential test set out in the NPPF Technical Guidance is applied and that most new development is located in Flood Zone 1. Additionally, they require that a site-specific Flood Risk Assessment, which takes account of future climate change, is undertaken for development proposals of 1 hectare or more in flood zone 1. Furthermore, appropriate surface water drainage arrangements for dealing with surface water run-off from new development should be provided including, if feasible, the use of Sustainable Drainage Systems.

5.47 A Flood Risk Assessment (FRA) and Surface Water Drainage Strategy supports the planning application. In summary, it concludes:

- The report has evaluated the flood risk to the proposed site, in addition to considering the impact that the proposal will have on the surrounding area.
- It concludes that that the majority of the proposed development including the proposed access is located in fluvial Flood Zone 1, and is at very low risk of flooding from groundwater and reservoirs. This site is shown to be at limited risk of surface water flooding along the access, however the incorporation of the mitigation measures as detailed in the FRA, will reduce the risk to site users.
- The surface water runoff will discharge into a drainage system and recycled within the AD Plant's processes.
- To prevent pollution to the surface waters, underlying geology, and groundwater an appropriate level of water treatment stages has been incorporated into the design.
- To reduce the risk of flooding due to the failure of the surface water drainage system over its lifespan, a maintenance scheme for the drainage should be adhered to, as detailed within this report.

5.48 Consequently, the proposals will accord with the relevant provisions of the NPPF and policies of the Development Plan regarding flood risk and surface water drainage.

Landscape and Visual Impact

5.49 Relevant polices concerned with the protection of the landscape and visual impact include: the NPPF; MWLP Policy 17 (Design), together with SCLP Policies CC/2 (Renewable and Low Carbon Energy Generation), HQ/1 (Design Principles), and NH/2 (Protecting and Enhancing Landscape Character). Acknowledging the importance of landscape and visual impact of a new waste/renewable energy facility, the following have been prepared to support the preparation of these proposals, and the application:

Landscape and Visual Impact Assessment (LVIA)

5.50 An LVIA was undertaken to determine the impacts of the proposed AD plant. It concludes:

- The site does not fall under any statutory or non-statutory landscape designations.
- The site is located within a simple rectangular field under intensive arable cultivation, with no significant landscape features.
- There are a number of landscape receptors within the Study Area. They were assessed in terms of their sensitivity to change and the potential effects of the Proposed Development upon them. It is acknowledged that the site occupies an area with a landscape character described as a tranquil, often remote rural landscape, and with a relatively low capacity to accommodate development.
- A wider study of the visibility of the Site was undertaken using desk-based research, site visits and the production of a digital Zone of Theoretical Visibility. From this data, visual receptors were identified, along with 15 representative viewpoints.
- The ZTV analysis shows that there will be a relatively narrow cone of visibility of the proposed development toward the south-western and north-western quadrants, and locally toward the north-east. However, the site is located within a small valley and largely screened by topography and woodland for receptors from the north-east through to south-west. It its furthest extent, the ZTV suggests that the site will be visible from distances of up to 3.5 kilometres near West Wratting House. However, at this location the visual impact is considered to be negligible due to the effects of distance and the fact that the plant will be a very small element in the landscape and coloured with recessive hues.
- Some filtered views toward the development are possible from nearby footpaths, although new planting and infilling of gaps in existing hedgerows will reduce these impacts. The most significant visual impacts will be for road users from close viewpoints along approximately 600 metres of Dean Road and 600 metres of Webb's Road.
- There will be no loss of trees and hedgerows as a result of the proposals. Extensive landscape mitigation proposals have been developed as part of an iterative process. This accords with National, Regional and District landscape character objectives. The new tree and hedgerow planting around the site will visually form an extension to existing trees and woodland, and also provide biodiversity gains. The conversion of 3.65 hectares of arable land to the north of the site will provide significant habitat enhancement.
- Considerable effort has gone into the design of the built form, including its layout, orientation, and elevation to respond to surrounding landform, existing farm complex and landscape character. With the extensive landscape mitigation proposals, it is considered that the proposed development can be accommodated satisfactorily into the landscape.

Trees and Arboricultural Impact

5.51 A tree survey of the entire application site was undertaken, and an Arboricultural Impact Assessment (AIA) prepared to support the application. It concludes:

- There are no trees relevant to the development that are protected by a Tree Preservation Order, and the site is not within a Conservation Area;
- The construction of the new site access and visibility splay off the A1307 is not thought to impact the aesthetic or amenity value of the local landscape;
- The construction of the proposed access road from the A1307 has the potential to impact trees and will require a no-dig cellular confinement system and barrier fencing during the construction phase of development;
- The Tree Asset Plan displays the tree positions, radial spread of roots and canopies of trees, and is provided as a separate document (Ref: NWS 2022.095.1_Streetly Hall Farm - AD Plant TAP_TPP).
- An Arboricultural Method Statement is required to guide the construction and establish a method of arboricultural supervision and monitoring. The Arboricultural method Statement will ensure there is minimal risk of adverse impact on the trees to be retained.

Landscaping Mitigation Scheme

5.52 The majority of the adverse landscape and visual effects are predicted during the construction stages and at completion when the landscape and built development are raw and the planting immature. It is acknowledged that the site construction process, with the use of mobile cranes and scaffolding and the need for multiple vehicular movements and stockpiled materials, will cause some temporary adverse landscape and visual effects.

5.53 However a comprehensive landscape scheme has been developed as a component of the design process, and which responds to the existing landscape structure, the new development, topography, and viewpoints. The key landscape proposals are as follows:

- *10 metre-wide tree belt around the site, widened on the northern and western boundaries. Total area 1.97 hectares;*
- *Woodland block close to the visually-sensitive junction of Dean Road and the Harcamlow Way footpath. Total area 2333m²;*
- *Arable field to the north and west converted to meadow. Total area 3.65 hectares;*
- *Hedgerow on the outside of the tree belt and in-filling the hedge on Webb's Road. Total length 1105m;*
- *Hedgerow alongside the new access road. Total length 1426m;*
- *Gaps in hedgerow along Harcamlow Way in-filled.*

5.54 Proposed landscape mitigation is illustrated on the submitted 'Landscaping Proposals' Plan (ref. 2022-444-013 Rev G); extract at Figure 3, below. The proposed mitigation landscaping will provide Biodiversity Net Gain (see below: Ecology and Biodiversity').

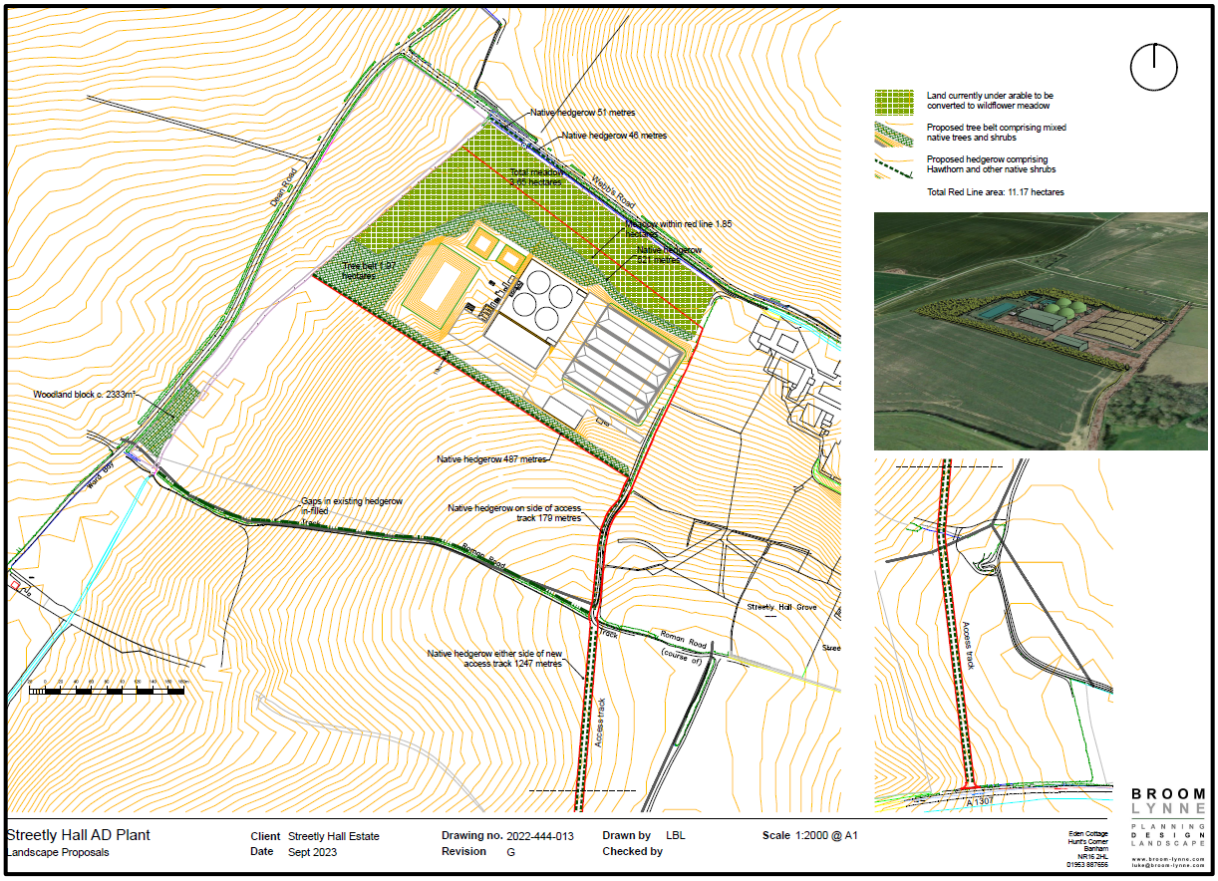

Figure 3: Landscaping proposals

5.55 It is acknowledged that the proposed development represents the introduction of significant, new development into a rural landscape. The location, design and layout have been given very careful consideration, and adapted/amended as a result of pre-application consultation, including the introduction of extensive landscaping proposals. Colour finishes to the main plant structures and buildings are proposed in an attempt to minimize visibility and visual impact, having regard to the landscape form and backdrops – including sky - from various vantage points. However, the applicant is happy to discuss this further with the LPA, to agree on colours/finishes that best achieve that.

5.56 Whilst inevitably having some new impact on the appearance of the rural landscape in this location, it is not therefore considered that the development will have such a significant, overall impact upon the landscape character of the area as to conflict with relevant national or Development Plan policies concerning design, the protection of the countryside and landscape impact. And that the overriding benefits of the proposed development (see below) – taken together with the extensive landscape/landscaping mitigation proposed – outweigh any adverse effects of landscape and visual impact.

Traffic and Transport

5.57 Relevant policy on traffic and transport is set out in: the NPPF; Policies MWLP 1 (Sustainable Development and Climate Change), and MWLP 23 (Traffic, Highways and Rights of Way); and SCLP Policy T1/2 (Planning for Sustainable Transport). These policies' primary objective is to promote more sustainable transport and to ensure that development proposals are capable of being served by safe access to the highway network, without detriment to the amenity or character of the area. Paragraph 111 of the

NPPF advises: *"Development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe."*

5.58 MWLP Policy 23 states that waste development will only be permitted if:

"(a) appropriate opportunities to promote sustainable transport modes can be, or have been, taken up, to the degree reasonably available given the type of development and its location. If, at the point of application, commercially available electric Heavy Commercial Vehicles (HCVs) are reasonably available, then development which would increase HCV movements should provide appropriate electric vehicle charging infrastructure for HCVs;
(b) safe and suitable access to the site can be achieved for all users of the subsequent development;
(c) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree;
(d) any associated increase in traffic or highway improvements would not cause unacceptable harm to the environment, road safety or residential amenity, and would not cause severe residual cumulative impacts on the road network; and
(e) binding agreements covering lorry routing arrangements and/or HCV signage for mineral and waste traffic are agreed, if any such agreements are necessary and reasonable to make a development acceptable."

5.59 MWLP Policy 23 goes on to note: *"Where mineral and/or waste is to be taken on or off a site using the highway network, then all proposals must demonstrate how the latest identified HCV Route Network is, where reasonable and practical to do so, to be utilised. If necessary, arrangements ensuring that the use of the HCV Route Network takes place may need to be secured through an appropriate and enforceable agreement. Any non-allocated mineral and waste management facility in Cambridgeshire which would require significant use of the highway must be well related to the HCV Route Network."*

5.60 It should be noted that the majority of off-farm feedstock would be delivered (and digestate removed) via a new access to/from the A1307, approximately 200 metres west of Mill House. The A1307 is an HGV Route Type A Road, on the Cambridgeshire Advisory Freight Map, and so the relevant part of MWLP Policy 23 is met.

5.61 The application is supported by a Transport Statement, produced following pre-application consultation with planning and transportation officers of the County Council. First stage pre-application consultation highlighted that the three junctions available for access from the farm to the A1307 were not ideal for HGV movements (including existing farm traffic). The two junctions in Horseheath involved vehicles passing dwellings on narrow lanes, and the Dean Road / A1307 junction presented safety concerns as trailers would hang back onto the eastbound carriageway when performing a westbound turn. Consequently, an alternative approach was put forward, whereby a new access road, extending south of the existing farm road, which presently runs north-south along the eastern boundary of the proposed main plant site), would be formed, together with a new vehicular access directly south of the site, from the A1307. This would replace an existing and largely disused farm access some 200 metres to the east, onto the A1307. These proposals include a newly designed access, with visibility splays to meet requisite standards, to ensure that such an access will be acceptable from a capacity and safety perspective, at the proposed location. Detailed plans are submitted with the application.

5.62 It is expected that the new access road will not only be utilised for AD plant traffic but also traffic of the existing farming operation. Currently, agricultural machinery and farm HGV traffic access the A1307 along roads through the villages of Streetly End and Horseheath. The new access road will carry existing farm traffic, and in so doing reduce movements through Streetly End and eliminate farm traffic through Horseheath.

5.63 MWLP Policy 23 also notes that: *"During all phases of development, including construction, operation and restoration, proposals must make provision for suitable and appropriate diversions to affected public rights of way, and ideally the enhancement of the public rights of way network where practicable."* The new access road crosses a PROW (an operational farm track), although there is no intention that the position or use of this be affected or altered in any way.

5.64 The application is also supported by a Construction Traffic Management Plan (CTMP), designed to control/manage all relevant matters during the construction period -in the event of planning permission being granted – including the timings of construction traffic movements during the build phase including construction traffic routing, construction worker parking, construction site access and environmental considerations.

5.65 The Transport Statement concludes:

- The Transport Statement outlines the anticipated transport movements to arise from the development against traffic data, and demonstrates that the resultant impact on the local highway network will be minimal (0.19% increase in movements on the A1307) and therefore, in our opinion, acceptable.

- It also should be considered that many of these transport movements are already in existence on the local highway network in association with the Applicant's – and the other units involved - existing agricultural operations, as well with the current waste disposal arrangements.

- In addition, some of the movements will remain internal within the Applicant's landholding.

- Although sustainable travel opportunities are limited for the site, the nature of the development means that it needs to be located in a rural setting near to material source and output locations, and in a location where it will have a minimal amenity impact.

- The closer the plant is located to the Applicant's landholding, the shorter the travel distances on the highway network. Policy TI/2 of the SCLP requires development to be "..located and designed to reduce the need to travel". Whilst travel is always going to be necessary for the type of proposed development, the application site has been chosen because of its proximity to the sources and destinations of the input and output materials, keeping travel distances to a minimum.

- The accident data obtained identifies two collisions in the vicinity of the proposed vision splays recorded; however, these were prior to the operation of the average speed cameras, and therefore it is anticipated that road safety has improved along this stretch of road. This is indicated by the speed data which confirms that on average, the 50mph speed limit is being adhered to.

- The access design has demonstrated that the required visibility splays can be provided and includes an exit slip road to ensure that vehicles can slow down;

therefore the introduction of the access is not anticipated to impact road safety at this location.

- The proposed access has been selected due to its good visibility, good transport links onto the A1307 and beyond, and minimal impact on any surroundings. Whilst the applicants do have use of an existing shared access onto the A1307, it proposes to cease its use to reduce impact on the residential dwelling it is shared with.

- Access onto the A1307 will ensure that impact on single carriageway roads and villages is minimised.

5.66 The Transport Statement demonstrates that the overall vehicle movements to/from the proposed facility would not be material in the context of existing vehicles on the local highway network. The vehicle types concerned already operate on the network through farming activity. A new vehicular access is proposed, minimising movements on the minor/local road network and removing some existing farm traffic therefrom (and from movements through villages). Having regard to all the above, it is considered that the proposed development is satisfactory from a traffic and highway viewpoint. The proposed development will have no material adverse impact upon the local highway system (movement of feedstocks, biofertiliser and CO_2) or any increased highway dangers to road users or pedestrians. Consequently, the proposals accord with the relevant provisions of the NPPF and policies of the Development Plan - in particular MWLP Policy 23 - regarding sustainable transport and highway safety.

Noise

5.67 The NPPF, MWLP Policies 17c (Design) 18 (Amenity Considerations), and 23d (Traffic, Highways and Rights of Way); and SCLP Policy SC/10 (Noise Pollution) are concerned with the protection of amenity, which will include noise.

5.68 A Noise Impact Assessment accompanies the planning application. It was undertaken to identify the key sources of noise associated with the development, which may produce adverse noise impacts upon the closest residential receptors to the development. It concludes:

- The sound climate in the area close to the residential receptor is comprised of distant road traffic noise from vehicles on the A1307 and intermittent movements of agricultural machinery.

- The assessment has relied upon a background sound survey completed in a location considered to be representative of the sound climate at the closest residential receptor. The assessment has used CadnaA noise modelling software to accurately model the predicted level of noise at the closest receptors to the site.

- The assessment has shown that during the daytime, the rated level of noise proposed by the proposed development does not exceed the typical background sound level at the closest residential receptor. Additionally, during the night-time period, the level of noise falls below the internal noise criteria level for bedrooms.

- With regards to HGV noise on the new access road, this assessment has shown that the predicted noise levels from HGVs accessing and egressing the site fall below the precited level of noise from the A1307. As such, no noise mitigation measures are required.

- The assessment has shown that during the construction phase the predicted noise level falls below the guidance contained in BS 5228 for rural areas.

- In summary, the low predicted level of noise at the receptor, accords with the 'No Observed Adverse Effect Level' as detailed in the PPG.

5.69 Consequently, the development proposals accord with the relevant provisions of the NPPF and policies of the Development Plan.

Odour

5.70 The NPPF, MWLP Policy 18 (Amenity Considerations) and SCLP Policy SC/14 (Odour and Other Fugitive Emissions to Air) are concerned with the protection of amenity, which will include odour.

5.71 The application is supported by an Odour Assessment. It concludes:

- Odour emissions from the facility have the potential to cause impacts at sensitive locations. An Odour Assessment was therefore undertaken to quantify effects in the vicinity of the plant.

- Potential odour releases were defined based on the size and nature of the facility. These were represented within a dispersion model produced using ADMS-6. Impacts at sensitive receptor locations in the vicinity of the site were quantified, the results compared with the relevant odour benchmark level and the significance assessed in accordance with the IAQM guidance.

- Predicted odour concentrations were below the relevant odour benchmark level at all residential receptor locations for all modelling years. The significance of predicted impacts was defined as slight at two receptors and negligible at six locations.

- In accordance with the stated guidance, the overall odour effects as a result of the facility are considered to be not significant. As such, potential odour emissions are not considered to represent a constraint to the development.

5.72 Consequently, the development proposals accord with the relevant provisions of the NPPF and policies of the Development Plan.

Air Quality

5.73 MWLP Policy 18f (Amenity Considerations) and SCLP Policy SC/12 (Air Quality) are concerned with the protection of amenity, which will include air quality.

5.74 The application is supported by an Air Quality Assessment. It concludes:

- The facility has the potential to cause air quality impacts as a result of emissions from activities on site. As such, an Air Quality Assessment was undertaken in order to determine baseline conditions and quantify potential effects.

- Dispersion modelling was undertaken in order to predict pollutant concentrations at sensitive locations as a result of emissions from the development. Impacts at sensitive receptors were quantified and the results compared with the relevant EQSs and significance criteria.

- Predicted concentrations of all pollutants were below the relevant EQSs at all locations of human exposure for all meteorological data sets modelled. Resultant impacts were classified as not significant in accordance with the IAQM criteria.

- Impacts were also predicted at sensitive ecological habitats. Predicted effects on pollutant concentrations and deposition rates were not considered to be significant at all designations, either alone or in-combination with other plans or projects, in accordance with the EA and NE criteria.

5.75 Consequently, the development proposals accord with the relevant provisions of the NPPF and policies of the Development Plan.

Lighting

5.76 MWLP Policy 18g (Amenity Considerations), and SCLP Policy SC/9 (Lighting Proposals) are concerned with light pollution and the protection of amenity and landscape character.

5.77 The applicant has not yet formulated lighting proposals for the proposed AD plant. However, the intention is that there will be only low-level security/bulkhead type lighting on buildings, and that a suitable condition of a planning permission can be applied to control/approve a lighting scheme, prior to the plant becoming operational. It is acknowledged that the accompanying ecological impact assessment identifies that there could be an impact on any on-site bat population via light disturbance, which is to be mitigated by adopting wildlife sensitive lighting scheme. Such a scheme would – of necessity – comply with the relevant provisions of the Development Plan.

Historic Environment (Heritage Statement)

5.78 The policy context for which is provided by the NPPF, Policy 21 (The Historic Environment), and Policy NH/14 (Heritage Assets) of the SCLP. These place considerable importance to the desirability of preserving the significance of designated and non-designated heritage assets, including archaeological features.

5.79 The Planning (Listed Buildings and Conservation Areas) Act 1990 states that in considering applications for development which affects a heritage asset or its setting, local planning authorities shall have special regard to the desirability of preserving the building or its setting.

5.80 The National Planning Policy Framework (NPPF) expands on the 1990 Act. It identifies protection and enhancement of the historic environment as an important element of sustainable development and establishes a presumption in favour of sustainable development in the planning system. The NPPF also states that the significance of listed buildings and conservation areas can be harmed or lost by alteration to them or by development in their setting, and that the conservation of heritage assets is a core principle of the planning system.

5.81 Paragraph 194 of the NPPF requires an applicant to *"describe the significance of any heritage assets affected, including any contribution made by their setting"*. Paragraph 197 requires local planning authorities, in determining applications to take account of *"the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation"*.

5.82 An historic environment desk-based assessment was undertaken to guide the proposals in preparation, and supports this planning application. The assessment draws together the available archaeological, historical, topographic, and land-use information in order to clarify the heritage significance and archaeological potential of land at Streetly Hall Farm. It addresses the information requirements set out in the NPPF, and provides the proportionate response sought by the NPPF.

Designated Heritage Assets

5.83 Three designated heritage assets are potentially sensitive to development as proposed and on the application site, in terms of impact to their setting comprising: Grade II Streetly Hall farmhouse (300m east); Grade II* St Mary's Church (1.25km north-east); and Grade II* West Wratting Park House (3.25km north-east). The assessment concludes that – given the distances involved and the absence of any real intervisibility – the special historic interest and significance of the two Grade II* listed buildings, derived from their historic, aesthetic, architectural and evidential values, would remain unaltered as a result of the proposed development. Despite being closer to the proposed development, Grade II Streetly Hall Farmhouse, the assessment concludes that the overall impact of the development on its significance would be neutral (i.e., no harm).

Archaeology

5.84 Assessment involved research of available archaeological records, combined with analysis of historical mapping, and the results of previous archaeological investigations in the search area, together with the results of a geophysical survey of the application site. The study site has been assessed as having moderate potential to contain remains from the prehistoric to Roman periods. The significance of any such remains would be vested in their evidential value and relative importance linked to their potential to add to national and regional research. There is no evidence to suggest that the site contains, or has the potential to contain, archaeological remains of sufficient importance to prevent or constrain development. In these circumstances, it is reasonable for any further investigation to be secured by a condition to any grant of planning permission.

5.85 The application proposals therefore accord in full with the relevant provisions of the NPPF and policies of the Development Plan, insofar as they concern the protection and conservation of the historic environment (including designated heritage assets and archaeology).

Ecology and Biodiversity

5.86 There are a range of policy documents that seek to ensure adequate protection of ecology and biodiversity in considering development proposals. Relevant policies include the NPPF, MWLP Policy 20 (Biodiversity and Geodiversity), and Policies NH/4 (Biodiversity) and NH/5 (Sites of Biodiversity or Ecological Importance).

5.87 An Ecological Impact Assessment accompanies the application. It concludes as follows:

- No impacts on current features of any nearby designated conservation sites;
- Neutral impacts are anticipated through the removal of a section of hedgerow to facilitate the new access (with the implementation of mitigation);
- A minor but insignificant, negative impact as a result of the direct loss of arable habitat considered to be of low biodiversity value;
- A potential impact to resident badger immediately adjacent to the site. Further survey for badger is recommended to determine the full impacts on the species. A disturbance licence is likely to be required to close the set for the duration of the construction phase of the project;
- A potential minor/negative impact to any on-site bat population via light disturbance, which is to be mitigated by adopting wildlife sensitive lighting scheme

- A potential minor/negative impact on local hedgehogs and brown hare, which can be mitigated by fitting any open excavations with escape ramps and having precautionary methods of material storage and movement;

- A potential for minor/negative impact to on-site nesting birds, which can be mitigated by the timing of vegetation clearance and by otherwise using watching briefs to confirm nest absence;

- On-site habitat creation/enhancement measures are proposed to ensure a minimum 10% Biodiversity Net Gain is achieved. There is the potential for overall site biodiversity enhancement by providing bat roost boxes, bird nest boxes and using native species for soft landscaping. [The accompanying Landscaping Proposals plan (extract at Figure 3, above) illustrates that extensive, indigenous planting is proposed, to include:

    - 10 metre-wide tree belt around the site, widened on the northern and western boundaries. Total area 1.97 hectares;
    - Woodland block close to the visually-sensitive junction of Dean Road and the Harcamlow Way footpath. Total area 2333m²;
    - Arable field to the north and west converted to meadow. Total area 3.65 hectares;
    - Hedgerow on the outside of the tree belt and in-filling the hedge on Webb's Road. Total length 1105m;
    - Hedgerow alongside the new access road. Total length 1426m;
    - Gaps in hedgerow along Harcamlow Way in-filled.

5.88 A Biodiversity Net Gain Assessment also accompanies and supports the application. Biodiversity Metric 4.0 has been used to calculate the habitat and hedgerow units pre- and post-development. The metric calculations for the proposed development site baseline, and the recommendations to achieve a 10.63% net gain for habitat units on site, have been provided. An outline Management and Monitoring Plan has also been provided to address successful implementation and management thereof.

5.89 Consequently, the development proposals accord with the relevant provisions of the NPPF and policies of the Development Plan insofar as they relate to ecological protection and biodiversity (including net gain in excess of 10%), given that any impacts identified can be adequately managed and/or mitigated..

Employment and Agricultural Diversification

5.90 Key relevant policies on employment and agricultural diversification are set out in: the NPPF; SCLP Policy CC/2 (Renewable and Low Carbon Energy Generation) and Policy E/18 (Farm Diversification).

5.91 The NPPF states that planning policies and decisions should enable (inter alia); *"the sustainable growth and expansion of all types of businesses in rural areas…." and "the development and diversification of agricultural and other land-based rural businesses."* (Paragraph 84). The application proposes rural/agricultural diversification through the development of renewable energy, enhancing the rural economy and agricultural viability. The AD plant would be operated by the farmer and the viability of the farm enterprise would be supported by direct capital investment and facilitating the sustainable use of purpose grown crops and the disposal of agricultural waste, and the creation of renewable energy therefrom. The proposed development would create direct and indirect employment opportunities, short term and long term, as well as providing for sustainable agricultural diversification.

6. The Planning Balance

6.1 At the heart of the planning balance is Section 38(6) of the Planning and Compulsory Purchase Act 2004; which requires that, if regard is to be had to the Development Plan for the purpose of any determination to be made under the Planning Acts, determination must be made in accordance with the Plan unless material considerations indicate otherwise.

6.2 SCLP Policy CC/2 (Renewable and Low Carbon Energy Generation) states that renewable energy generating development will be supported and considered – broadly - in the context of sustainable development and climate change, taking account of factors including: environmental, social, and economic benefits (public benefits) of renewable energy gain. In essence, the policy - and others in the SCLP and WMLP - recognise the balance to be struck in assessing such renewable energy proposals: the environmental benefit of the proposal must be balanced against the environmental harm that it may cause. (Paragraph 18a-020-20140306 of the Planning Practice Guidance elaborates on what is meant by 'public benefits' in this context).

6.3 National planning policy on renewable energy is set out in the NPPF. The NPPF supports the provision of renewable energy if the impacts are, or can be made, acceptable. In terms of environmental benefits, the proposed AD plant would produce approximately 60,000MWh per year of renewable energy (biomethane) from local biomass, sufficient energy based on an average household consumption of 12 MWh/annum) to serve around 5,000 homes. Total CO_2 emissions saved (based upon a CO_2 output from burning gas of 0.185 kg/kWh) would be 9,250,000 kg of CO_2 per annum. The scheme would remove the equivalent of 18,000,000 road car miles in carbon capture each year. The scheme would replace the majority of Streetly Hall Farm's (and partners') reliance of imported chemical fertilisers. The scheme would produce renewable CO_2 for industrial use (agriculture, construction, food processing, etc.).

6.4 The proposed renewable energy development would result in a significant reduction in diffuse pollution: replacing open fields storage and the spreading of manure/slurry, which is the largest contributor to diffuse pollution in the UK, with sealed drained surfaces of the AD Plant).

6.5 It would also contribute to farm diversification, and soil conditioning, and would create direct and indirect economic benefits to the locality during the construction and operational phases. Significant local benefits will be created to support the local rural economy, in line with the provisions of the NPPF (paragraph 84).

6.6 Policies of the MWLP seek to ensure that waste is managed sustainably, including by moving waste up the waste hierarchy, and that waste management facilities in rural areas are located specifically to meet the waste recycling or recovery needs of the related farm holding. The application proposals demonstrate that these policy provisions are met, that there is a locational/waste management imperative for an AD plant to be located at Streetly Hall Farm (and in the location identified, having appraised other options), and that a substantial majority of the waste will move up the waste hierarchy.

6.7 In terms of environmental harm the proposed AD plant would, given its location in the countryside, have some noticeable visual impact upon the local landscape from some perspectives, and this is evidenced in the accompanying Landscape and Visual Appraisals. Landscape mitigation, involving extensive woodland and hedgerow planting, will provide longer-term landscape structure and ameliorate the impact of the proposals, together with the creation of habitats and associated biodiversity net gain. These offer benefits to which significant weight should be afforded.

6.8 The proposed AD plant would result in no harm to the setting and significance of designated or non-designated heritage assets. Considerable weight and importance are given to the duty imposed by Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, and therefore to the strong presumption in favour of the desirability of the preservation of heritage assets.

6.9 Aside from the benefits arising directly from renewable energy, a new vehicular access is proposed, minimising movements on the minor/local road network and removing some existing farm traffic therefrom (and from movements through villages).

6.10 The balancing exercise to be conducted requires planning judgement to be exercised. Setting aside other considerations, the environmental benefits of the AD plant development, and therefore of exploiting renewable resources in the national interest, demonstrably outweighs harm that would be caused to the character of the landscape. SCLP Policy CC/2 states that that planning permission for proposals to generate energy from renewable and low carbon sources will be permitted where they do not have "unacceptable adverse impacts"; in effect where any adverse effects are outweighed by the benefits. Considering all the above, the applicants contend that the benchmark of "unacceptable adverse impacts" is not reached by these proposals, and that in any event the proposed mitigation will address some of the visual impacts, and which can be controlled by condition. The planning balance is therefore in favour of the proposed AD plant development, which thus accords with SCLP Policy CC/2, and other relevant policies of the Development Plan.

6.11 In any event, even if it was considered contrary to the assessment above in this planning statement and that there was a conflict with the Development Plan, the benefits of the proposals quite clearly outweigh such conflict, given the environmental and economic benefits of this development.

7. Summary and Conclusions

7.1 The application is submitted on behalf of Streetly Hall Farm, in support of an application for planning permission for the construction of a farm-based Anaerobic Digestion (AD) renewable energy facility, construction of vehicular access/road to A1307, associated infrastructure and landscaping, on land at Streetly Hall Farm, Streetly End, West Wickham.

7.2 The proposed facility will convert locally sourced biomass (crops and farm waste) into biomethane, which will be injected directly into the gas grid. In addition, an odourless organic biofertiliser and soil improver will be produced from the digestion process, which will be returned to local farms as a replacement for artificial fertilisers and to improve soil quality. The facility will capture CO_2 from the digestion process, making this facility carbon negative. A farm-based AD plant would facilitate long-term farm sustainability/viability, extend local/rural economic development, reduce the carbon footprint of the farm(s) and generate green energy as part of the UK's net zero strategy.

7.3 The development is proposed within the context of Government policy in respect of the need to address the increasingly urgent problem of climate change, the promotion of renewable energy, the growth and diversification of the rural economy, and the management of waste. The site location and development proposals have been carefully considered with regard to environmental factors, including traffic and landscape impact, alongside the constraints, characteristics and opportunities presented by this site and its context, including those issues addressed above, together with the various supporting assessments and findings which accompany the application. The proposals have been designed to minimise any adverse effects whilst maximising the benefits of the

construction of a renewable energy facility, and thus accord with the relevant Development Plan, and national planning and renewable energy policies.
