

Our ref: CCC23110FUL\_ECO\_20230119  
Contact: Deborah Ahmad – 07391730740  
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ecology@cambridgeshire.gov.uk  
Date: 19/01/2024  
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Cambridgeshire  
County Council

# Memorandum

**Ecology Advisory Service to [planningdc@cambridgeshire.gov.uk](mailto:planningdc@cambridgeshire.gov.uk), County Planning  
Minerals and Waste, Cambridgeshire County Council.**

Planning ref	CCC/23/110/FUL
Proposal	Farm-based anaerobic digestion renewable energy facility, construction of vehicular access/road to A1307, associated infrastructure and landscaping
Address	Land At Streetly Hall Farm, Webbs Road, West Wickham, Cambridge, Cambridgeshire, CB21 4RP
Planning Case Officer	Helen Wass

Dear Planning Case Officer,

## **Ecological advisory service from Biodiversity team**

Thank you for your consultation letter received 27 October 2024 regarding the above planning application. The impact of a development on biodiversity is a material consideration in the planning process. We recommend refusal until the following information is provided to demonstrate the level of impact on biodiversity:

1. Air quality report – updated to better reflect proposed scheme
2. Submission of badger report
3. Ecological Report – update to include off-site landscaped areas and botanical surveys of arable field margins.
4. Biodiversity Net Gain – update to better reflect proposals and include off-site landscaped areas
5. Lighting – confirmation of lighting scheme

Please find further information below:

1. Air quality report

We are in agreement with Natural England's recommendation of the air quality report to better reflect the potential impact of the scheme on designated wildlife sites. This assessment should consider impact on County Wildlife Sites.

We're also unclear why there is no consideration of the impact of air quality on ecological receptors within the Ecological Report. We would expect the ecology report to interpret the findings of the air quality report. We recommend this document be updated to include the wildlife



sites listed within the air quality report, including ancient woodland / county wildlife sites.

## 2. Badger report

Document: **Norfolk Wildlife Services (2023) Ecological Report: Land at Streetly Hall Farm, West Wickham, Cambridgeshire. 20/10/2023\_ISSUE**

Section 5.4 of the Ecological Report identified the requirements for further surveys to determine the level of badger activity at sett TN1.

We are concerned that the applicant has not submitted the results of badger survey work. It is therefore not possible to determine the potential impact of the scheme on badgers, a protected species. This information must be submitted prior to determination.

## 3. Arable field margins / calcareous grassland

Document: **Norfolk Wildlife Services (2023) Ecological Report: Land at Streetly Hall Farm, West Wickham, Cambridgeshire. 20/10/2023\_ISSUE**

Section 4.3.1 of the Ecology Report identifies the presence of 'c1a – Arable margin, 16 – tall herb' habitat. The species list provided suggests that areas of the field margins support interesting flora, indicative of either calcareous grassland and/or potential to support notable arable flora.

We seek clarification as to why detailed botanical surveys have not been completed of these field margins to determine if they support notable arable flora and/or calcareous grassland. Arable field margins are a priority habitat and can support national / county important populations of notable arable flora species.

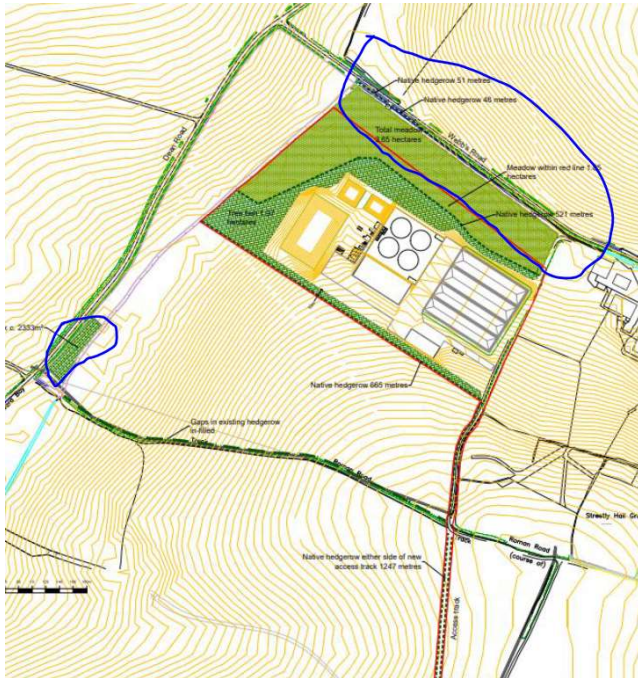
## 4. Off-site landscape scheme

Document: **Landscape Proposals Steetly Hall AD Plant – drawing 2022-44-013 revision G**  
Document: **Norfolk Wildlife Services (2023) Ecological Report: Land at Streetly Hall Farm, West Wickham, Cambridgeshire. 20/10/2023\_ISSUE**

We are concerned that the Ecological Report does not provide a baseline assessment of the areas identified for off-site landscape proposals on the Landscape Proposals drawing 2022-44-013 revision G, including areas of a woodland block, native hedgerows and arable farmland conversion to wildflower meadow.

It is therefore not possible to determine the ecological impact of the proposed landscape scheme. We are particularly concerned given that there may be loss of arable field margins, which may support notable arable flora assemblages. These areas should be surveyed prior to determination of the planning application.

Areas in question are circled in blue below:



## 5. Biodiversity Net Gain Assessment

Document: **Norfolk Wildlife Services (2023) Biodiversity Net Gain Assessment Land at Streetly Hall Farm, West Wickham. 17/10/23\_Issue**

We are concerned that the Biodiversity Net Gain Assessment does not accurately reflect the baseline habitats, or the proposed landscape scheme shown on Landscape Proposals drawing 2022-44-013 revision G. The BNG assessment should be updated to address the following issues and provide an accurate representation of the proposed scheme:

### a. Baseline habitats

There appears to be inconsistencies between the habitats described within Section 5.3.1 and those listed within Table 5. In addition, it is unclear why 'other neutral grassland' has been utilised, given that the flora recorded at the site are more indicative of calcareous grassland. Please clarify.

Figure 3 does not show all habitats present on the site and therefore, it is not clear where the hedgerows and other neutral grassland (as listed in table 5).

A baseline assessment for off-site habitats to be impacted by the landscape proposals should also be included, so that off-site BNG can be accurately calculated.

### b. Proposed habitats

The post-development calculations does not include all habitats proposed for the site, including hedgerows. In addition, it does not include off-site habitat to be created as part



of the landscape scheme.

The assessment is also based on Landscape Proposals drawing 2022-44-013 revision F, not the latest version (G).

## 6. Lighting

We are concerned that lighting of the access track has the potential to impact on species associated with the adjacent woodland and commuting along the Roman Road. We seek confirmation from the applicant as to whether lighting will be installed along the access track.

### Conclusion

In light of the above, we consider insufficient and inaccurate information has been provided and therefore, the level of impact of the proposal on biodiversity cannot be fully determined. It is not possible to determine whether the scheme will comply with Policy 20 of the Minerals and Waste Plan 2021 and policy NH/4 of South Cambridgeshire Local Plan 2018, which seek to conserve biodiversity and deliver net gain in biodiversity.

We therefore recommend refusal until further information is supplied to address the above concerns.

Yours sincerely

*Deborah Ahmad*

Deborah Ahmad (she/her pronouns)  
Ecology Officer  
Biodiversity and Greenspaces team

*Please note: this service provides (internal) professional ecological expertise to the LPA officers. It does not constitute a formal opinion from Cambridgeshire County Council on the above planning application.*

*We are reliant on the accuracy and completeness of the reports in undertaking our review, and can take no responsibility for incorrect data or interpretation made by the authors*

**If you have any queries regarding this application, please contact the Officer named at the top of this letter (contact details are above).**

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