

Andy Rutter
Development Manager (Planning)
Suffolk County Council

By email only

17th April 2024

Dear Andy,

RE: SCC/0045/23SE | Construction and operation of an anaerobic digestion facility, associated infrastructure and new access road, connecting pipeline and covered digestate lagoons | Land to the north of Spring Grove Farm, Withersfield, Suffolk, CB9 7SW

Suffolk Wildlife Trust have been informed about this application by member of the public concerned that works to onsite waterways could impact water vole. Upon review of the application, we wish to raise a *Holding Objection* and make the following comments.

Suffolk Wildlife Trust support the comments made by Natural England¹, which state that further information is required to ensure that there is no significant effect on Over and Lawn Woods SSSI. While it is of clear importance that the potential for air quality to impact SSSIs is assessed, Suffolk Wildlife Trust put forward that to meet Policy CS2 of the current local plan², this assessment should also consider the potential for air quality to impact County Wildlife Sites (CWSs) and Priority Habitats.

The Ecology Chapter³ of the Environmental Statement appears to omit CWSs within Cambridgeshire, including Cadge's Wood CWS which lies within 100m of the off-site lagoon at the north of the redline boundary. Cadge's Wood is identified as an ancient woodland but is not noted as a CWS. This is a significant omission from the ecological report. Clarification that a full data search from the Cambridgeshire & Peterborough Environmental Record Centre⁴ should be provided.

The Ecology Chapter also describes several water courses, including one clearly holding water. This raises two important issues:

- That an additional water vole survey should be undertaken in the Spring months, as part of best practice.
- That the Biodiversity Net Gain Assessment⁵ should include River Units as well as Habitat Units; the provided red line boundary and the ecological field survey clearly show that the site includes the riparian zone; therefore, the Biodiversity Net Gain Assessment should include River Units at baseline and a 10% net gain must be provided.

¹ Letter, 23/10/2023, Natural England to Mr Rutter (SCC), Ref: 451923, Planning: SCC/0045/23SE

² https://www.westsuffolk.gov.uk/planning/Planning_Policies/local_plans/upload/Core-Strategy-December-2010.pdf

³ SLR, 2023, Proposed Anaerobic Digestion Facility At Spring Grove Farm, Withersfield, Final Version; *Chapter 8; Ecology*.

⁴ <https://www.cperc.org.uk/>

⁵ SLR, 2023, Proposed Anaerobic Digestion Facility At Spring Grove Farm, Withersfield, Final Version; *Chapter 8; Ecology, App. 2*.

While no hedgerows are removed due to the methods proposed, hedgerows remain within the red line boundary. Therefore, a baseline hedgerow score should be given, and the proposals should demonstrate that a net gain of hedgerow units is provided.

Where net gain assessments are undertaken, the guidelines for Biodiversity Net Gain assessments must be followed, and it is clear that the proposals impact river and hedgerow units as well as area habitats and at least a 10% net gain should be provided for all three to ensure that all legislation, including the National Planning Policy Framework⁶, is followed.

For the above reasons, Suffolk Wildlife Trust wish to submit a *Holding Objection* to the proposal. Please keep us informed of any further information regarding the application.

Yours sincerely,
Alex Jessop
Planning & Advocacy Officer
planning@suffolkwildlifetrust.org

⁶ https://assets.publishing.service.gov.uk/media/65a11af7e8f5ec000f1f8c46/NPPF_December_2023.pdf