

27 October 2023



Andrew Rutter  
Suffolk County Council

South Cambridgeshire Hall  
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Dear Sir/Madam

**CAMBRIDGE CITY COUNCIL**  
**Consultation Response on Application**

Proposal: Application No: SCC/0045/23SE - Construction and operation of an anaerobic digestion facility, associated infrastructure and new access road, connecting pipeline and covered digestate lagoons.

Site address: Land To The North Of Spring Grove Farm Withersfield Suffolk

Please find enclosed the Local Planning Authority's response on the above matter.

Yours faithfully

A large black rectangular box used to redact a signature.

SJ Kelly  
Joint Director For Planning & Economic Development For  
Cambridge & South Cambridgeshire

Contact: Nick Yager  
Telephone: [REDACTED]  
Email: Planning@greatercambridgeplanning.org

Our Ref: 23/03764/CNA

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Site address: Land To The North Of Spring Grove Farm Withersfield Suffolk

Thank you for your consultation request received on 26th September 2023 on the following matter:

Application No: SCC/0045/23SE - Construction and operation of an anaerobic digestion facility, associated infrastructure and new access road, connecting pipeline and covered digestate lagoons.

at

Land To The North Of Spring Grove Farm Withersfield Suffolk

**Internal consultations**

Landscape Architects

**OBJECTION**

South Cambridgeshire District Council objects to the proposal and has the following comments to make;

Consultations comments have received from South Cambridgeshire District Council's Environmental Health's and Landscape Officer's.

**Principle of the Development**

The proposal should be assessed in accordance with Policy CC/2 (Renewable and Low Carbon Energy Generation) of the South Cambridgeshire Local Plan 2018 and para 158 of the National Planning Policy Framework 2023.

Policy CC/2 states the following;

1. Planning permission for proposals to generate energy from renewable and low carbon sources, with the exception of proposals for wind turbines, will be permitted provided that:

- a. The development, and any associated infrastructure, either individually or cumulatively with other developments, does not have unacceptable adverse impacts on heritage assets (including their settings), natural assets, high quality agricultural land, the landscape, or the amenity of nearby residents (visual impact, noise, shadow flicker, odour, fumes, traffic);
- b. The development can be connected efficiently to existing national energy infrastructure, or by direct connection to an associated development or community project, or the energy generated would be used for on-site needs only;
- c. Provision is made for decommissioning once the operation has ceased, including the removal of the facilities and the restoration of the site; and
- d. Developers have engaged effectively with the local community and local authority.

This policy sets out the criteria that must be considered when assessing proposals for developments to generate renewable or low carbon energy from freestanding installations, such as wind or solar farms.

Renewable and low carbon energy generation sources can either fully or partially displace the use of fossil fuels. These sources include technologies such as photovoltaic panels, wind turbines, solar thermal panels, air or ground source heat pumps, anaerobic digestion, combined heat and power plants, and biomass boilers where heat is generated. These technologies need to be located on-site or close to the energy users.

Using renewable and low carbon energy technologies to generate electricity and/or heat will help to reduce greenhouse gas emissions and should also progressively improve the security, availability and affordability of energy by increasing the diversity of sources we can access.

Para 158 of the National Planning Policy Framework 2023 states the following;

When determining planning applications for renewable and low carbon development, local planning authorities should:

- a) not require applicants to demonstrate the overall need for renewable or low carbon energy, and recognise that even small-scale projects provide a valuable contribution to cutting greenhouse gas emissions;
- b) approve the application if its impacts are (or can be made) acceptable. Once suitable areas for renewable and low carbon energy have been identified in plans, local planning authorities should expect subsequent applications for commercial scale projects outside these areas to demonstrate that the proposed location meets the criteria used in identifying suitable areas, and

c) in the case of applications for the repowering and life-extension of existing renewable sites, give significant weight to the benefits of utilising an established site, and approve the proposal if its impacts are or can be made acceptable.

### Environmental Health Impact's

Policy HQ/1 of the South Cambridgeshire Local Plan states all new development must be of high quality design, with a clear vision as to the positive contribution the development will make to its local and wider context. As appropriate to the scale and nature of the development, proposals must: n. Protect the health and amenity of occupiers and surrounding uses from development that is overlooking, overbearing or results in a loss of daylight or development which would create unacceptable impacts such as noise, vibration, odour, emissions and dust;

Noise wise - there are 2 sites which may be subject to higher noise levels (night time) than what is ideal. To give this context though, the noise levels are predicted to be external and going by the assumption of 15dB reduction (window open for ventilation). However, these properties may outside the South Cambridgeshire District area and so it would be best placed raised by Suffolk's Environmental Health Officer's

Odour - the applicant has identified the odorous parts of the activity and appear to be operating along the lines of best practice (delivery buildings with airlocks, cover tanks, etc). The applicant has looked at the prevailing wind conditions and suggest odours won't be an issue. However, there don't seem to find any odour modelling contour maps which would be useful to understand the odour further from a lay person's perspective. The information is considered to be necessary to be provided.

Assuming pp is granted, the site will be regulated by an Env. Permit. This would be regulated by the Environment Agency rather than local authority.

### Landscape Impacts

#### Summary

The comments below are made separately on the Main Site and the Pipeline and Lagoons Site. Landscape Officers for South Cambridgeshire District Council wish to object to the proposed development due to insufficient information and non-compliance with local plan policies High Quality Design (HQ/1) and Protecting Landscape Character (NH/2).

Policy HQ/1 Design Principles states 1. All new development must be of high quality design, with a clear vision as to the positive contribution the development will make to its local and wider context. As appropriate to the scale and nature of the development, proposals must: a. Preserve or enhance the character of the local urban and rural area and respond to its context in the wider landscape; b. Conserve or enhance important natural and historic assets and their setting; c. Include variety and interest within a coherent, place-responsive design, which is legible and creates a positive sense of place and identity whilst also responding to the local context and respecting local distinctiveness; d. Be compatible with its location and appropriate in terms of scale, density, mass, form, siting, design, proportion, materials, texture and colour in relation to the surrounding area; e. Deliver a strong visual relationship between buildings that comfortably define and enclose streets, squares and public places, creating interesting vistas, skylines, focal points and appropriately scaled landmarks along routes and around spaces;

Policy NH/2 Protecting and Enhancing Landscape Character states development will only be permitted where it respects and retains, or enhances the local character and distinctiveness of the local landscape and of the individual National Character Area in which is it located.

There are concerns regarding the features being incongruous within the rural landscape, affecting the countryside intrinsic character and beauty. There are also concerns regarding visual effects on receptors within South Cambridgeshire District Council. These concerns relate specifically to:

1. The A1307
2. Silver Street

3. Visual receptors around the off-site lagoons (which have not been represented in viewpoint photography)

Please see detailed comments on these matters in the LVIA - Main Site and LVIA - Lagoon Site sections below

In terms of the proposals, further information and amendments are requested as detailed in the sections below. In addition to those comments, the following information affecting both sites is requested:

1. The landscape proposals are not sufficiently detailed to properly understand the proposed mitigation. Further information is needed on proposed planting densities and the sizes of the proposed plants. We anticipate that much of the tree planting would be installed as whips; this would be acceptable where the planting is on the proposed spoil heap. However, a more immediate level of screening is needed on site boundaries. The site boundaries will require larger feathered and standard specimens in addition to the woodland mix, to provide a level of immediate cover.

2. Whilst it should not always be the aim to 'hide' all development, in this location a robust level of screening would be needed where open views of the features are available, to avoid detracting from the surrounding landscape. Most site boundaries should be planted with a minimum 7m depth of woodland belt to allow sufficient layering of planting to screen the larger structures, and those which are not typical to the rural landscape - in some instances the success of boundary planting will need to be illustrated via type 4 visualisations.

3. Details have been provided on the proposed fencing types, but submitted site plans do not provide enough detail on where these fences would be located. Please seek further information on this prior to determination to ensure that the proposed mitigation would be sufficient to screen and soften boundary structures.

4. Please provide details on the height of the proposed lighting columns. We recommend these should be no higher than 8-10m to avoid being seen above the tree line.

5. The Lagoon Detail drawings (refs: 29351-P-121 revE and 29351-P-121 revH, both by GGP Consult) provide cross sections and information on the embankments of the lagoons, however, I can not find details on how the lagoons would be 'covered'. Further information is needed on this element of the lagoons.

#### LVIA - Main Site

The receiving landscape has been assessed as having community value. As clearly stated by GLVIA 3, the lack of designations is not a direct indicator of lack of value.

We consider the value of this landscape to be understated. The receiving landscape is noted as being rather intact and inclusive of valued landscape features, such as ancient woodland, county wildlife sites, and wooded river tributaries. The wider landscape is littered with scheduled monuments, specifically moated sites, which suggests a landscape with clear evidence of historical interest. The dense network of footpaths further suggests an ancient landscape, but also adds to the recreational value of the site. We would suggest the landscape is at least of local value.

Being a site in the countryside, it is considered the receiving landscape is highly susceptible to the type of development proposed. The overall sensitivity of the receiving landscape should be considered medium to medium-high.

Page 22 of the LVIA describes that the stand of mature poplar trees to the west of the site offers a lower level of visual screening however, no viewpoint photography has been provided for this location from the A1307. At present this road has a strong rural quality visually, and there is concern that the proposals would have a harmful effect on views from the road, as well as the perceived landscape character. Visual representation is needed to better understand the potential effects of the development to this location.

No viewpoints have been provided from footpaths on higher land to the south of the proposed site. Please seek clarity on whether it was considered there would be no intervisibility to these routes.

We consider the visual effects suggested for viewpoint 3 have been understated. Given the relative sparsity of intervening vegetation, the largest elements of the proposed development would break the skyline, be prominent to visual receptors in this location, and incongruous in the surrounding rural landscape. Without the emerging foliage of the large tree (willow?) by the roadside we question how much more of the proposed development would be visible in winter months. Furthermore, whilst Silver Street is not a footpath, it does provide the entry point to many footpaths, and is therefore highly likely to also be used by recreational pedestrians.

Very little allowance has been made for additional vegetation on the western boundary of the site. We consider the visual effects to this location to be unacceptable, though this could potentially be mitigated by a more robust landscape strategy.

#### Comments on the proposals - Main Site

There is concern that the proposed development would be incongruous within this rural location, affecting both landscape character and views, and the intrinsic character and beauty of the countryside. Whilst there is merit in some of the mitigation proposals, we specifically raise concerns regarding the following:

- The mitigation on the western edge is insufficient. There are serious concerns regarding the visual impacts to receptors viewing the proposals within the overwhelmingly rural context. A suitable mitigation strategy should be tested via the LVIA (or an addendum to).
- The proposals for the large spoil heap on the eastern part of the site are not clear. Sections should be provided showing soil build ups and the proposed gradients of the edges. The edges should be varied to help create a more natural landform and integrate it into the receiving landscape.
- Structures on southern boundary should be pushed further into the site, allowing a wider band of woodland mix to be implemented along the site edge (however, the potential for this strategy to help mitigate the effects should be dependent on the findings of further viewpoint photography and visualisation from the A1307)

#### LVIA - Off-site Lagoons and Pipeline

The value of the receiving landscape should be of local value, as per the main site.

There is concern that the magnitude of landscape effects on the pipeline and digestate lagoons site has also been understated, as it is likely the large, engineered embankments of the lagoons would be prominent and incongruous in the receiving landscape. It is not considered that the proposed planting is sufficient to help to assimilate the lagoons into the receiving landscape.

No viewpoint photography or visualisations have been provided for the off-site lagoons. We recommend further information, including viewpoint photography from a series of local receptors, is sought prior to determination. A type 4 visualisation would aid in understanding how 2.5-3m high engineered slopes, fencing and proposed mitigation would sit within the receiving landscape. Without this information is not possible to gain a clear understanding of the landscape or visual baseline or the potential impacts of the lagoons and their fencing.

#### Off-site Lagoons

The lagoons would be in open countryside. There is a risk that the engineered features and boundary treatments would have a harmful effect on the "intrinsic character and beauty of the countryside".

The proposed lagoon site is adjacent to areas of ancient woodland, which offer screening to some visual receptors, however it is considered that a feature that is discreet from the vegetation typologies within this elevated landscape would be incongruous and harmful. At present the proposed mitigation for the off-site lagoons is not acceptable. No details have been provided on planting densities, however, the 3m width allowed for woodland planting would create a thin line of vegetation. This would be incongruous in the receiving landscape. A more organic form with greater and variable depth is needed to help the feature better assimilate with the existing woodland blocks. The appearance of the proposed mitigation should be illustrated within a type 4 visualisation from an appropriate viewpoint location.

The submitted LVIA suggests that the lagoon edges would slope gently from the existing ground levels to a height of 2-2.5m. Contrary to this description, the detailed drawings suggest the lagoons would have a gradient of 1:1. Please seek clarity on this. A gradient of 1:1 would not be acceptable, as it would create an extremely engineered appearance, and seeding is unlikely to establish on such a steep slope.

If you have any queries or wish to discuss the above please contact me.

We look forward to receiving notification of the decision notice.

Yours faithfully

Nick Yager  
Principal Planning Officer

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[REDACTED]