Date: 18 November 2021
Our ref: 371705
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Claire Deery
EIA Advisor on behalf of the Secretary of State
The Planning Inspectorate
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BY EMAIL ONLY CambridgeWWTPR@planninginspectorate.gov.uk

Dear Ms Deery

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017(the EIA Regulations) – Regulations 10 and 11

Application by Anglian Water Services Limited (the Applicant) for an Order granting Development Consent for the Cambridge Wastewater Treatment Plant Relocation (the Proposed Development)

Scoping consultation and notification of the Applicant's contact details and duty to make available information to the Applicant if requested

Thank you for seeking our advice on the scope of the Environmental Statement (ES) in your consultation letter dated 20 October 2021.

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

Case law[1] and guidance[2] has stressed the need for a full set of environmental information to be available for consideration prior to a decision being taken on whether or not to grant planning permission. Annex A to this letter provides Natural England's advice on the scope of the Environmental Impact Assessment (EIA) for this development.

Should the proposal be amended in a way which significantly affects its impact on the natural environment then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again.

[1] Harrison, J in *R. v. Cornwall County Council ex parte Hardy* (2001)
[2] *Note on Environmental Impact Assessment Directive for Local Planning* Authorities Office of the Deputy Prime Minister (April 2004) available from http://webarchive.nationalarchives.gov.uk/+/http://www.communities.gov.uk/planningandbuilding/planning/sustainabilityenvironmental/environmentalimpactassessment/noteenvironmental/

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us. For any queries or further information relating to the specific advice in this letter only please contact Janet Nuttall on 020 802 65894. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours sincerely

Janet Nuttall
Sustainable Land Use Adviser

Annex A – Advice related to EIA Scoping Requirements

1. General Principles

Schedule 4 of the Town & Country Planning (Environmental Impact Assessment) Regulations 2017, sets out the necessary information to assess impacts on the natural environment to be included in an ES, specifically:

- A description of the development – including physical characteristics and the full land use requirements of the site during construction and operational phases.
- Expected residues and emissions (water, air and soil pollution, noise, vibration, light, heat, radiation, etc.) resulting from the operation of the proposed development.
- An assessment of alternatives and clear reasoning as to why the preferred option has been chosen.
- A description of the aspects of the environment likely to be significantly affected by the development, including, in particular, population, fauna, flora, soil, water, air, climatic factors, material assets, including the architectural and archaeological heritage, landscape and the interrelationship between the above factors.
- A description of the likely significant effects of the development on the environment – this should cover direct effects but also any indirect, secondary, cumulative, short, medium and long term, permanent and temporary, positive and negative effects. Effects should relate to the existence of the development, the use of natural resources and the emissions from pollutants. This should also include a description of the forecasting methods to predict the likely effects on the environment.
- A description of the measures envisaged to prevent, reduce and where possible offset any significant adverse effects on the environment.
- A non-technical summary of the information.
- An indication of any difficulties (technical deficiencies or lack of know-how) encountered by the applicant in compiling the required information.

It will be important for any assessment to consider the potential cumulative effects of this proposal, including all supporting infrastructure, with other similar proposals and a thorough assessment of the 'in combination' effects of the proposed development with any existing developments and current applications. A full consideration of the implications of the whole scheme should be included in the ES. All supporting infrastructure should be included within the assessment.

Natural England is satisfied with the details of the proposed development, the alternatives considered, the consultation process and proposed EIA methodology set out in Chapters 1 -5 of the EIA Scoping Report, prepared by Mott MacDonald (October 2021) on behalf of Anglian Water Services Limited.

2. Biodiversity and Geology

2.1 Ecological Aspects of an Environmental Statement

Natural England advises that the potential impact of the proposal upon features of nature conservation interest and opportunities for habitat creation/enhancement should be included within this assessment in accordance with appropriate guidance on such matters. Guidelines for Ecological Impact Assessment (EcIA) have been developed by the Chartered Institute of Ecology and Environmental Management (CIEEM) and are available on their website. The proposed assessment methodology set out in Section 8.11 of the EIA Scoping appears to meet these requirements. We welcome that reference will be made to Natural England standing advice.

EcIA is the process of identifying, quantifying and evaluating the potential impacts of defined actions on ecosystems or their components. EcIA may be carried out as part of the EIA process or to support other forms of environmental assessment or appraisal.

The National Policy Statement for Waste Water (NPSWW) sets out Government policy for the provision of major waste water infrastructure providing the primary planning basis for decisions on

NSIPs. The National Planning Policy Framework (NPPF) also sets out guidance in paragraphs 174-177 on how to take account of biodiversity interests in planning decisions and the framework that local authorities should provide to assist developers.

2.2 Internationally and Nationally Designated Sites
The ES should thoroughly assess the potential for the proposal to affect designated sites. European sites (e.g. designated Special Areas of Conservation and Special Protection Areas) fall within the scope of the Conservation of Habitats and Species Regulations 2017 (as amended). In addition paragraph 176 of the National Planning Policy Framework requires that potential Special Protection Areas, possible Special Areas of Conservation, listed or proposed Ramsar sites, and any site identified as being necessary to compensate for adverse impacts on classified, potential or possible SPAs, SACs and Ramsar sites be treated in the same way as classified sites.

Under Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended) an appropriate assessment needs to be undertaken in respect of any plan or project which is (a) likely to have a significant effect on a European site (either alone or in combination with other plans or projects) and (b) not directly connected with or necessary to the management of the site.

Should a Likely Significant Effect on a European/Internationally designated site be identified or be uncertain, the competent authority (in this case the Local Planning Authority) may need to prepare an Appropriate Assessment, in addition to consideration of impacts through the EIA process.

We welcome the Applicant's commitment to undertake HRA in accordance with the above advice as set out within sections 8.9.10 – 8.9.13 of the EIA Scoping report.

Sites of Special Scientific Interest (SSSIs) and sites of European or international importance (Special Areas of Conservation, Special Protection Areas and Ramsar sites)
The EIA Scoping Report identifies a biodiversity study area defined by the Ecological Zone of Influence (EZoI) of the Proposed Development which includes nationally and internationally designated sites within 10km of the EIA Scoping boundary:

- Wicken Fen Ramsar;
- Fenland Special Area of Conservation (SAC);
- Devil's Dyke SAC;
- Wicken Fen Site of Special Scientific Interest (SSSI);
- Devil's Dyke SSSI;
- Stow-cum-Quy Fen SSSI;
- Wilbraham Fen SSSI;
- Great Wilbraham Common SSSI;
- Fulbourn Fen SSSI;
- Cam Washes SSSI;
- Newmarket Heath SSSI
- Upware North Pit SSSI.

- Further information on the SSSI and its special interest features can be found at www.magic.gov . The Environmental Statement should include a full assessment of the direct and indirect effects of the development on the features of special interest within the above SSSIs and should identify such mitigation measures as may be required in order to avoid, minimise or reduce any adverse significant effects.

- European site conservation objectives are available on our internet site http://publications.naturalengland.org.uk/category/6490068894089216

Chapter 8 of the EIA Scoping report considers the following potential impacts to statutorily designated sites through the construction and/or operational phases of the development.

Wicken Fen SSSI, Ramsar and Fenland SAC

There is potential for hydrological impact as the site is downstream in the catchment of the River Cam. Construction activities in proximity to watercourses may result in the accidental release of potential pollutants.

Designated site habitats could be damaged or disturbed as a result of an increase in air pollution associated with construction (excavation / removal of habitats / release of pollutants). Impacts may arise on designated sites where vegetation may be sensitive to elevated levels of airborne dust from the works.

Potential impacts during operation of the Proposed Development could be due to excessive variations in discharge, or discharge of effluent of an unacceptable quality to the River Cam. Potential for hydrological/discharge impact as the site is downstream in the catchment of the River Cam.

No air quality impacts are anticipated during operation. Combustion has been scoped out of the assessment since the plant is < 20MW energy input; however, Natural England welcomes that this will be assessed through the HRA and EIA. Our advice is that assessment should also demonstrate that there will be no adverse impact associated with anaerobic digestion.

Stow-cum-Quy Fen SSSI

The SSSI is adjacent to Black Ditch and partly within Flood Zone 3 along the ditch. Water features in the centre of the SSSI are connected to the Black Ditch via a one-way valve which allows flow into Black Ditch during periods of high water levels in the fen. During periods of particularly high flow in Black Ditch, however, over-bank flow is understood to occur in the reverse direction from the ditch into the SSSI hence there is potential for connection in flood events.

Due to hydrological connectivity via Black Ditch there is potential for impacts associated with leaks and spills contaminating ground or surface waters. These issues will be addressed through robust design, protection measures and operational procedures for the WWTP and potentially through monitoring throughout and post-construction. We note that the Hydrogeological Impact Assessment (HIA) concluded that with appropriate construction design, management and operational management, including protection measures, it is unlikely that significant concentrations of potential contaminants will reach Black Ditch within 1,000 years and therefore, it is unlikely that there will be an adverse impact on Stow-cum-Quy Fen SSSI.

We note that impacts associated with a reduction in groundwater levels at the SSSI due to dewatering in the Chalk during shaft construction is scoped out of the assessment. This is based on initial calculations of dewatering quantities for the terminal pumping station shaft presented in the HIA which indicate that impacts would not extend as far as the SSSI.

New or enhanced public access opportunities may have the potential for recreational pressure impacts to sites such as Stow-cum-Quy Fen SSSI (and a number of locally designated wildlife sites). Natural England has recently noted evidence of the damaging effects of visitor pressure on sensitive habitats within the SSSI. Wet ground conditions significantly exacerbate visitor impacts to SSSI habitats. As with many other publicly accessible sites, visitor numbers to this attractive Fen site have increased notably through the Covid pandemic. Bespoke visitor surveys could help to identify the likely increase in visitors, and potential impacts to the SSSI, associated with any access enhancements through the Proposed Development; however, these will require significant survey effort, by specialist consultants, to provide robust and representative data to inform an assessment of impacts and identification of appropriate mitigation.

Alternatively, there is an opportunity here to create a new area/s of multifunctional accessible green space, as part of the Applicant’s proposals to enhance public access. Section 8.8.29 of the EIA Scoping report indicates that potential adverse impacts should be avoided through measures such as diverting pressure elsewhere (signage and interpretation), creating alternative accessible

greenspace, and or buffering and enhancing the resilience of these designated sites. Natural England's advice is that appropriately designed and managed 'alternative natural greenspace' could provide a new destination for visitors which could help to intercept and divert additional pressure away from more sensitive sites. The incorporation of high quality habitat creation would provide a range of ecosystem services and will benefit people and wildlife; this could help to buffer and enhance the resilience of the SSSI and achieve the Applicant's aspiration to contribute towards delivery of the Cambridge Nature Network and the National Trust's Wicken Fen Vision. Natural England will be pleased to engage with the Applicant on the development of a suitable mitigation and enhancement scheme.

Devil's Dyke SAC;
Potential for air quality nitrogen deposition impacts, in-combination with other plans and projects, associated with traffic-emissions.

No air quality impacts are anticipated during operation. Combustion has been scoped out of the assessment since the plant is < 20MW energy input; however, Natural England welcomes that this will be assessed through the HRA and EIA. Our advice is that assessment should also demonstrate that there will be no adverse impact associated with anaerobic digestion.

Wilbraham Fen SSSI
Traffic related air quality impacts: the SSSI is within 200m of the A1303, which may be used by operational traffic. The EIA Scoping report considers that the change in pollutant concentration as a percentage of the relevant critical level or load is likely to be less than 1% and therefore unlikely to have any adverse impact. Natural England welcomes that further assessment will be undertaken to confirm that there will be no adverse impacts on the sensitive notified features of the SSSI.

Cam Washes SSSI
The SSSI is downstream of the Proposed Development and the discharge location and is highly dependent on surface water and is subject to winter flooding, which could be contaminated if pollutants are released.

During operation, treated water that flows towards the Cam Washes SSSI has the potential to impact on water quality sensitive features.

Upware North Pit SSSI:
The SSSI is downstream of the Proposed Development and the discharge location. It may be hydrologically linked via the River Cam and Cam Washes SSSI.

As indicated in our response to the Phase Two Consultation the proposed scheme is within the ~20km potential foraging distance of the barbastelle bat population of Eversden and Wimpole Woods Special Area of Conservation (SAC). Bat surveys should seek to demonstrate that the project will not have any adverse effect on SAC barbastelles or habitat functionally linked to the SAC.

Other comments
The Scoping report outlines primary, secondary and tertiary measures to mitigate adverse ecological impacts through the construction and operational phases of the proposed development. We welcome that these seek to avoid impacts in the first instance, in line with the ecological mitigation hierarchy.

Natural England is satisfied with those ecological features scoped out of the assessment, detailed in Section 8.9.5 and Table 8-11 of the Report. This includes Newmarket Heath SSSI on the basis of no hydrological or ecological pathways for impact. We note that Great Wilbraham Common and Fulbourn Fen SSSIs are identified within Table 8-6 as being within the study area although they are not considered further in the report. We trust that further consideration will be given to potential impacts to these sites within the ES.

Section 8.6.13 of the EIA Scoping report identifies that there are 13 Local Natures Reserves (LNR) designated for biodiversity features within the study area. Natural England is satisfied with the proposed approach to assessing the potential impacts of the Proposed Development on these sites.

With regard to water resources we note that potential impacts on the water resources supporting water dependent features of designated nature conservation sites, are discussed in the EIA Scoping report *Chapter 21: Water Resources* whilst the assessment of effects on these designated nature conservation sites is discussed in *Chapter 8: Biodiversity*. We welcome that the EIA will take account of all potential effects on surface water and groundwater resources as well as surface water and groundwater quality in the study area and that a separate assessment will be carried out of the impacts of effluent discharge on water quality in the River Cam and, we assume, the downstream SSSIs discussed above.

We note that the full potential impact of effluent and storm flows to the River Cam will be modelled, including river bed scouring and that the estimated magnitude and frequency of the storm events are currently being developed through network modelling and storm storage and treatment options. We assume that the findings of future modelling will be used to inform an assessment of impacts to the River Cam and downstream sites including the Cam Washes SSSI.

Section 21.5.40 of the report indicates that a number of sites, including Stow-cum-Quy Fen SSSI, could be directly affected by final effluent discharge; however, the Cam Washes SSSI and other downstream sites are not mentioned.

The EIA Scoping report indicates that, if required, a water quality monitoring programme will be agreed with EA to detect potential contaminant releases. It would be helpful if details of the sampling programme, including potential timescales for monitoring, could be provided in the ES.

Section 21.9.2 of the report states that Natural England received and reviewed the hydrogeological impact assessment produced prior to site selection. It should be noted that we became aware of this document in August 2021 and submitted comments to the Applicant on 6 September 2021.

Subject to clarification on the above points Natural England is generally satisfied with the matters scoped into the EIA for assessment outlined in Tables 21-9 and 21-10.

2.3 Regionally and Locally Important Sites

The EIA will need to consider any impacts upon local wildlife and geological sites. Local Sites are identified by the local wildlife trust, geo-conservation group or a local forum established for the purposes of identifying and selecting local sites. They are of county importance for wildlife or geodiversity. The Environmental Statement should therefore include an assessment of the likely impacts on the wildlife and geodiversity interests of such sites. The assessment should include proposals for mitigation of any impacts and if appropriate, compensation measures. Contact the local wildlife trust, geo-conservation group or local sites body in this area for further information.

The proposed approach to the consideration of impacts to regionally and locally important wildlife sites, set out in Chapter 8 of the EIA Scoping report, appears appropriate and generally accords with our advice above.

2.4 Protected Species - Species protected by the Wildlife and Countryside Act 1981 (as amended) and by the Conservation of Habitats and Species Regulations 2017 (as amended)

The ES should assess the impact of all phases of the proposal on protected species (including, for example, great crested newts, reptiles, birds, water voles, badgers and bats). Natural England does not hold comprehensive information regarding the locations of species protected by law but advises on the procedures and legislation relevant to such species. Records of protected species should be sought from appropriate local biological record centres, nature conservation organisations, groups and individuals; and consideration should be given to the wider context of the site for example in terms of habitat linkages and protected species populations in the wider area, to assist in the impact assessment.

The conservation of species protected by law is explained in Part IV and Annex A of Government Circular 06/2005 *Biodiversity and Geological Conservation: Statutory Obligations and their Impact within the Planning System*. The area likely to be affected by the proposal should be thoroughly surveyed by competent ecologists at appropriate times of year for relevant species and the survey results, impact assessments and appropriate accompanying mitigation strategies included as part of the ES.

In order to provide this information there may be a requirement for a survey at a particular time of year. Surveys should always be carried out in optimal survey time periods and to current guidance by suitably qualified and where necessary, licensed, consultants. Natural England has adopted standing advice for protected species which includes links to guidance on survey and mitigation.

The proposed approach to the consideration of impacts on protected species including bats, otter, badger, breeding birds, water vole and reptiles, set out in *Chapter 8 Biodiversity* of the EIA Scoping report, appears appropriate and generally accords with our advice above.

Where a species mitigation licence is required we recommend that full draft applications are submitted for Natural England's review at the pre-application stage. This will enable any licensing issues to be discussed and resolved early on so that Natural England is able to issue the applicant with a 'Letter of No Impediment' for submission at the application stage. Further information is available in the Planning Inspectorate's Advice Note 11, Annex C.

Natural England welcomes that a Preliminary Ecological Appraisal (PEA) was undertaken between July and September 2020 to establish the broad ecological baseline for the Proposed Development and surrounding areas which may be affected by the works. The findings of the PEA have informed habitat and protected species survey undertaken throughout 2021 to determine the ecological baseline. Natural England is satisfied with the ecological receptors and survey summaries detailed in Table 8-3.

2.5 Habitats and Species of Principal Importance

The ES should thoroughly assess the impact of the proposals on habitats and/or species listed as 'Habitats and Species of Principal Importance' within the England Biodiversity List, published under the requirements of S41 of the Natural Environment and Rural Communities (NERC) Act 2006. Section 40 of the NERC Act 2006 places a general duty on all public authorities, including local planning authorities, to conserve and enhance biodiversity. Further information on this duty is available here https://www.gov.uk/guidance/biodiversity-duty-public-authority-duty-to-have-regard-to-conserving-biodiversity.

Government Circular 06/2005 states that Biodiversity Action Plan (BAP) species and habitats, 'are capable of being a material consideration…in the making of planning decisions'. Natural England therefore advises that survey, impact assessment and mitigation proposals for Habitats and Species of Principal Importance should be included in the ES. Consideration should also be given to those species and habitats included in the relevant Local BAP.

Natural England advises that a habitat survey (equivalent to Phase 2) is carried out on the site to identify any important habitats present. In addition, ornithological, botanical and invertebrate surveys should be carried out at appropriate times in the year, to establish whether any scarce or priority species are present. The Environmental Statement should include details of:

- Any historical data for the site affected by the proposal (e.g. from previous surveys);
- Additional surveys carried out as part of this proposal;
- The habitats and species present;
- The status of these habitats and species (e.g. whether priority species or habitat);
- The direct and indirect effects of the development upon those habitats and species;
- Full details of any mitigation or compensation that might be required.

The development should seek if possible to avoid adverse impact on sensitive areas for wildlife within the site, and if possible provide opportunities for overall wildlife gain.

The record centre for the relevant Local Authorities should be able to provide the relevant information on the location and type of priority habitat for the area under consideration.

The proposed approach to the consideration of impacts on habitats and species of principal importance, set out in *Chapter 8 Biodiversity* of the EIA Scoping report, appears appropriate and generally accords with our advice above.

As indicated in section 2.4 above we welcome that a PEA was undertaken between July and September 2020 to establish the broad ecological baseline for the Proposed Development and surrounding areas which may be affected by the works.

We welcome that the Defra metric 3.0 will be used to demonstrate Biodiversity Net Gain (BNG) achieved through the landscape masterplan which will include habitat creation and enhancement proposals. Natural England welcomes that enhancement of ecological features will also be explored as part of delivering BNG.

2.6 Contacts for Local Records
Natural England does not hold local information on local sites, local landscape character and local or national biodiversity priority habitats and species. We recommend that you seek further information from the appropriate bodies (which may include the local records centre, the local wildlife trust, local geo-conservation group or other recording society and a local landscape characterisation document).

3. Designated Landscapes and Landscape Character

Landscape and visual impacts
Natural England supports the proposed approach to assessing the landscape and visual impacts of the proposed scheme as set out in Chapter 14 of the EIA Scoping report. This appears to largely reflect our advice below.

Natural England would wish to see details of local landscape character areas mapped at a scale appropriate to the development site as well as any relevant management plans or strategies pertaining to the area. The EIA should include assessments of visual effects on the surrounding area and landscape together with any physical effects of the development, such as changes in topography.

The EIA should include a full assessment of the potential impacts of the development on local landscape character using landscape assessment methodologies. We encourage the use of Landscape Character Assessment (LCA), based on the good practice guidelines produced jointly by the Landscape Institute and Institute of Environmental Assessment in 2013. LCA provides a sound basis for guiding, informing and understanding the ability of any location to accommodate change and to make positive proposals for conserving, enhancing or regenerating character, as detailed proposals are developed.

Natural England supports the publication *Guidelines for Landscape and Visual Impact Assessment*, produced by the Landscape Institute and the Institute of Environmental Assessment and Management in 2013 (3rd edition). The methodology set out is almost universally used for landscape and visual impact assessment.

In order to foster high quality development that respects, maintains, or enhances, local landscape character and distinctiveness, Natural England encourages all new development to consider the character and distinctiveness of the area, with the siting and design of the proposed development reflecting local design characteristics and, wherever possible, using local materials. The Environmental Impact Assessment process should detail the measures to be taken to ensure the

building design will be of a high standard, as well as detail of layout alternatives together with justification of the selected option in terms of landscape impact and benefit.

The assessment should also include the cumulative effect of the development with other relevant existing or proposed developments in the area. In this context Natural England advises that the cumulative impact assessment should include other proposals currently at Scoping stage. Due to the overlapping timescale of their progress through the planning system, cumulative impact of the proposed development with those proposals currently at Scoping stage would be likely to be a material consideration at the time of determination of the planning application.

The assessment should refer to the relevant National Character Areas which can be found on our website. Links for Landscape Character Assessment at a local level are also available on the same page.

As indicated in our response to the Phase Two Consultation, opportunities should be investigated to mitigate the visual impacts of the two ~26m anaerobic digesters, as far as possible; we note that these will be visible above the earthwork bank, including any screen on top.

We support proposals to deliver a comprehensive programme of additional landscaping, appropriate to the area, including tree and hedge planting, supported by a long-term management plan, to limit the impact of the scheme on the visual amenity of local residents and users of local roads and footpaths.

Consideration of options for landscaping and environmental mitigations beyond the edge of the facility's earthwork bank are particularly welcome. We note these could include creating new species-rich grassland meadow and hedgerows and planting new woodland which will also provide additional screening.

4. Access and Recreation

Natural England encourages any proposal to incorporate measures to help encourage people to access the countryside for quiet enjoyment. Measures such as reinstating existing footpaths together with the creation of new footpaths and bridleways are to be encouraged. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Relevant aspects of local authority green infrastructure strategies should be incorporated where appropriate.

The EIA should consider potential impacts on access land, public open land and rights of way in the vicinity of the development. We also recommend reference to the relevant Right of Way Improvement Plans (ROWIP) to identify public rights of way within or adjacent to the proposed site that should be maintained or enhanced.

Natural England supports proposals for the project to include some public access within the Proposed Development site and to enhance access to the wider countryside. Sections 2.7.90 – 2.7.91 of the EIA Scoping Report indicate a possible new public footpath connecting Low Fen Drove Way with the disused railway line and the creation of new footpaths and bridleways to open up recreational access in the area including to Quy Fen and Anglesey Abbey. The report suggests that this could form part of a new circular walking route from the WWTP of 3.5km and longer 9.5km loop for bridleway users, as indicated in Figure 2-22. As indicated above the effects of increased recreational pressure on Stow-cum-Quy Fen SSSI, and locally designated sites, will need to be robustly assessed and/or appropriate measures identified to address this issue.

5. Soil and Agricultural Land Quality

Soil is a finite resource that fulfils many important functions and services (ecosystem services) for society, for example as a growing medium for food, timber and other crops, as a store for carbon and water, as a reservoir of biodiversity and as a buffer against pollution. It is therefore important that the soil resources are protected and used sustainably.

Natural England welcomes that Chapter 6 Agriculture and Soils of the EIA Scoping Report considers the need to protect and enhance soils, particularly Best and Most Versatile land, including the important fenland peat resource, in accordance with national and local planning policy and guidance including the Cambridgeshire and Peterborough Minerals and Waste Local Plan, NPS WW, NPPF and the Defra 25 year Environment Plan. As an important natural carbon store the lowland peat resource plays a vital role in helping to improve air quality and climate change mitigation. Our advice is that sterilisation of peat soils should be avoided as far as possible. Consideration should be given to any opportunities to protect and enhance these areas and their biodiversity value.

We welcome that the EIA Scoping boundary will be subject to an Agricultural Land Classification (ALC) survey and pre-construction Soil Resource Survey. Our advice is that ALC survey should be undertaken at one auger boring per hectare supported by pits dug in each main soil type to confirm the physical characteristics of the full depth of the soil resource i.e. 1.2 metres. Further guidance is available in Natural England Technical Information Note 049 - *Agricultural Land Classification: protecting the best and most versatile agricultural land*.

We welcome that adverse impacts to soil structure and overall quality will be mitigated via the measures outlined in a Soil Management Plan (SMP) delivered through the Construction Environment Management Plan (CEMP) and that these will also provide guidance for the re-use of any surplus soil resources. Details should be provided in the Environmental Statement. Further guidance is contained in the *Defra Construction Code of Practice for the Sustainable Use of Soil on Development Sites*.

6. Air Quality

Air quality in the UK has improved over recent decades but air pollution remains a significant issue; for example over 97% of sensitive habitat area in England is predicted to exceed the critical loads for ecosystem protection from atmospheric nitrogen deposition (England Biodiversity Strategy, Defra 2011). A priority action in the England Biodiversity Strategy is to reduce air pollution impacts on biodiversity. The planning system plays a key role in determining the location of developments which may give rise to pollution, either directly or from traffic generation, and hence planning decisions can have a significant impact on the quality of air, water and land. The assessment should take account of the risks of air pollution and how these can be managed or reduced. Further information on air pollution impacts and the sensitivity of different habitats/designated sites can be found on the Air Pollution Information System (www.apis.ac.uk). Further information on air pollution modelling and assessment can be found on the Environment Agency website.

Natural England supports the proposed approach to assessing the air quality impacts of the development set out in Chapter 7 Air Quality of the EIA Scoping Report. We note that ecological receptors sensitive to air quality impacts have been identified separately in Chapter 8: Biodiversity and Natural England's comments on these are provided above.

As mentioned above, combustion has been scoped out of the assessment since the plant is < 20MW energy input; however, Natural England welcomes that this will be assessed through the HRA and EIA. Our advice is that assessment should also demonstrate that there will be no adverse impact to air quality sensitive designated sites associated with anaerobic digestion.

7. Climate Change Adaptation

The England Biodiversity Strategy published by Defra establishes principles for the consideration of biodiversity and the effects of climate change. The ES should reflect these principles and identify how the development's effects on the natural environment will be influenced by climate change, and how ecological networks will be maintained. The NPPF requires that the planning system should contribute to the enhancement of the natural environment 'by establishing coherent ecological networks that are more resilient to current and future pressures' (NPPF Para 174), which should be demonstrated through the ES.

Natural England supports the proposed consideration of the implications of the Proposed

Development on climate change and greenhouse gas emissions as set out in Chapter 9 Carbon and Chapter 10 Climate Resilience of the EIA Scoping Report.

8. Contribution to local environmental initiatives and priorities

Natural England welcomes reference within the EIA Scoping report to local Green Infrastructure and conservation initiatives including the Cambridge City Nature Conservation Strategy, the Cambridge Nature Network, the National Trust's Wicken Fen Vision and the Cambridgeshire Strategic Green Infrastructure Network (Strategic Network Area 6: Cambridge and Surrounding Areas).

The Applicant should aim to complement and, where possible, contribute towards the objectives and targets of the above initiatives, through the development of the Ecological Mitigation and Enhancement Strategy for the proposed scheme including delivery of BNG. The Strategy should seek to develop synergies with similar strategies implemented / emerging for nearby developments such as Waterbeach New Town, Land North of Cherry Hinton and the Marleigh development on Newmarket Road.

We recommend that consideration be given to opportunities to enhance the River Cam corridor through the project's aspirations to contribute towards delivery of the Cambridge Nature Network.

In addition to creation of species rich grassland and woodland and hedgerow planting we fully support the exploration of potential for wetland or grazing marsh given the significant benefits this could achieve for local biodiversity.

9. Cumulative and in-combination effects

Natural England supports the proposed approach to the assessment of cumulative effects presented in *Chapter 5, Interaction and accumulation of effects*. We welcome that for biodiversity this will consider other committed developments that give rise to additive/incremental impacts and effects or associated/connected impacts and effects with the Proposed Development, in line with CIEEM guidelines. This appears to be broadly in line with our advice below.

A full consideration of the implications of the whole scheme should be included in the ES. All supporting infrastructure should be included within the assessment.

The ES should include an impact assessment to identify, describe and evaluate the effects that are likely to result from the project in combination with other projects and activities that are being, have been or will be carried out. The following types of projects should be included in such an assessment, (subject to available information):

a. existing completed projects;
b. approved but uncompleted projects;
c. ongoing activities;
d. plans or projects for which an application has been made and which are under consideration by the consenting authorities; and
e. plans and projects which are reasonably foreseeable, i.e. projects for which an application has not yet been submitted, but which are likely to progress before completion of the development and for which sufficient information is available to assess the likelihood of cumulative and in-combination effects.