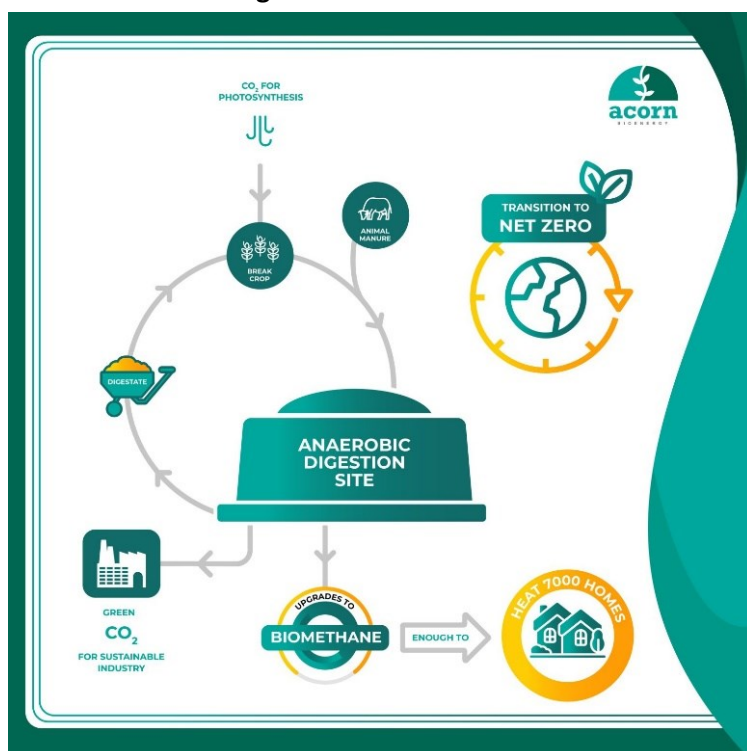


Dear residents and consultees,

Thank you for your comments regarding our proposed anaerobic digestion development at Ashton Keynes. We have been keeping a copy of every consultee response received on the above application (ref.PL/2023/03359), in order to address the comments and mitigate concerns of the local community. Acorn Bioenergy 'Limited 'Acorn' and SLR Consulting Limited 'SLR' have responded to several key themes, with input from the relevant technical disciplines as required.

Emissions Accounting:



Some public consultees questioned Acorn's Greenhouse Gas (GHG) emissions savings, commenting on the lack of consideration for the process in its entirety including transportation of feedstock and use of Combined Heat and Power (CHPs). It must be emphasised that Acorn's greenhouse gas savings account for all process emissions under OFGEM Renewable Heat Incentive Regulations (RHI) 2018 sustainability reporting criteria. Acorn also endeavours to install a carbon capture facility for biogenic CO2 utilisation or storage as recommended by the Biomass Strategy 2021. In this strategy, it is outlined that in the National Grid's 2020 Future Energy Scenarios it is not possible to reach net zero without Bioenergy with carbon

capture and storage (BECCs). The use of Carbon Capture Utilisation Storage (CCUS) makes Acorn's sites carbon negative.

Acorn will use International Sustainability and Carbon Certification (ISCC) accredited feedstock, with at least 50% of biogas being derived from manure / residues, and will supply the plant with locally grown silage i.e. grown within c.10 miles of the Site.

The facility will operate in compliance with sustainability criteria under the Non-Domestic RHI 2018 (as amended). As per 5.27 of the Guidance, for grid-injected biomethane the greenhouse gas (GHG) emissions value to report to Ofgem is the lifecycle GHG emissions associated with the biomethane injected, measured in grammes of carbon dioxide equivalent (gCO2e) per megajoule (MJ) of energy in the biomethane.

Our analysis accounts for all process emissions including:

- *Feedstock cultivation*
- *Application of digestate / synthetic fertiliser to silage*
- *Embodied emissions of seeds*
- *Fuel use during harvest and on farm fuel use*



- *Transport from point of collection to processing point*
- *Feedstock ensiling*
- *Heat and power requirements of the site*
- *Transport of biomethane to the injection hub*
- *Biomethane grid injection*

Acorn's goal is to produce biomethane with a carbon intensity that is significantly lower than that of gas in the grid, which is currently 67.59 gCO₂e/MJ on average (OFGEM RHI sustainability guidance figures). Using the RHI methodology, Acorn's biomethane will be approximately -20 gCO₂e/MJ. This is because of the application of CCUS. In the absence of CCUS, Acorn is still required to be below 34.8gCO₂e/MJ (significantly lower than grid values) to claim the RHI and we have chosen our feedstocks and distances accordingly. The biogas would be injected into the nearest mains gas hub at Banbury in Oxfordshire, and not Portsmouth as stated in several consultee responses. Acorn will also avoid emissions from carbon-intensive sources:

- Natural gas (67.59gCO₂e/MJ) in the national grid will be replaced with Acorn's biomethane
- Overseas imports of artificial fertiliser will be mitigated by the digestate. Digestate can directly replace a proportion of fossil fuel derived fertilisers and help farmers in their transition to net zero by 2030.

Methane emissions vs Biomethane production:

A number of responses also questioned the difference between potent methane emissions and the creation of biomethane. Biomethane is produced from anaerobic digestion and is not emitted into the atmosphere but used as a fuel. Therefore, Acorn's biomethane is not emitted. In fact, Acorn will prevent potent methane emissions by storing and processing agricultural waste, including manure, which otherwise would have been left in open air to degrade. The 'bio' component of the word emphasises that biomethane is not derived from fossil sources (like natural gas), but from agricultural feedstocks which have absorbed carbon dioxide from the atmosphere by photosynthesis.

The process can be visualised as a circular process where carbon is absorbed from the atmosphere and released back into the atmosphere upon combustion, making no net difference to emissions. However, the carbon capture facility will tip the balance to make our process carbon negative.

Electrification and biomethane:

A number of responses also emphasised the transition towards electrification and queried the use of biomethane in a net-zero strategy. Carbon-negative biomethane must be supplied to the UK's gas infrastructure to meet net-zero targets. Most homes in the UK do not have electrified heating systems and Acorn acknowledge the immediacy that biomethane provides for the current gas infrastructure. There are no infrastructure changes required to accommodate biomethane and hence, no embodied emissions associated with the installation of alternative heating systems like heat pumps.

Acorn highlights the vast governmental support for such a scheme, through both the 'Non-Domestic Renewable Heat Incentive' and the 'Green Gas Support Scheme.' Acorn also looks forward to the imminent publication of BEIS' biomass strategy which will detail the role of CCUS and BECCs in the energy transition.



Biomethane also provides an alternative fuel in hard-to-abate sectors such as the transport industry, including heavy goods vehicles (HGVs). All Acorn-owned HGVs will be powered on biomethane. We envisage that in the long term, bioenergy will work in conjunction with other renewable energy forms to combat the stochastic fluctuations of solar and wind energy i.e during a 'dunkelflaute' when no energy can be generated from traditional renewable sources.

Choice of location:

The location of AD sites is subject to significant scrutiny by a team of experts in Acorn prior to entering into the planning process.

Anaerobic digestion (AD) plants are ideally located in rural areas, where they are close to the source of feedstock and where the resulting digestate can be used in place of artificial fertilisers, on nearby arable land. It would make no sense to transport crops and manures from rural areas, into AD facilities in an urban area or industrial site, only to export the digestate back out to the rural area.

The Ashton Keynes site is near to agricultural land west at South Cerney, Ewen and Upper Siddington, which will provide the feedstock. There are also rich sources of feedstock to the south of Ashton Keynes, near Leigh and Purton Stoke. The choice of location minimises transport distances to ensure Acorn's process and carbon intensity remains negative. Ashton Road has good connections onto the B4696 which links to the A419 to the northeast for ease of accessibility.

Aside from the simple logic of a rural location, the location of AD plants is constrained by the Environment Agency's (EA) guidance on facilities (SR2021 No 7: Anaerobic digestion facility) which states that AD facilities should not be sited within any of the following, unless it can be shown that adverse effects can be satisfactorily managed or mitigated:

- groundwater source protection zone 1;
- 10 metres of a watercourse;
- A specified Air Quality Management Area (AQMA);
- 200 metres of the nearest sensitive receptor (unless the stack height is greater than 7m (or "3m effective height)).
- 250m of the presence of Great Crested Newts, where it is linked to the breeding ponds of newts by good habitat;
- 50m of a Local Nature Reserve, Local Wildlife Site, Ancient Woodland or Ancient Scheduled Monument;
- 500m of a European Site, or a SSSI.

Additionally, the best and most versatile agricultural land should be avoided, as should land at risk from flooding. The application site meets the criteria set out above and is classified as Grade 3 agricultural land which is 'good to moderate quality' arable land and is in Flood Zone 1 (low risk).

Following the completion of an air quality assessment, heritage assessment, flood risk assessment and ecological assessments, including great crested newt eDNA testing, we are satisfied that the application site meets the EA criteria. Where the AD facility is closer to a sensitive receptor, the technical assessment work has shown that any adverse effects can be satisfactorily managed or mitigated.



The Air Quality Assessment summarised in Chapter 4 of the Environmental Statement (ES) concluded that;

- long-term air quality impacts of predicted concentrations at both the nationally and locally designated ecological conservation areas are determined as not significant;
- The potential for impact on nationally and locally designated conservation sites as a result of nitrogen and acid deposition from the process is considered to be not significant; and
- the predicted air quality impacts are found not to be a constraint on the construction or operation of the proposed development.

Notwithstanding the conclusions of the Air Quality Assessment, owing to the presence of the Cotswold Water Park Site of Special Scientific Interest (SSSI) within 500m of the proposed site boundary and area of deciduous woodland designated as a Biodiversity Action Plan (BAP) priority habitat within 50m of the boundary, the proposed Ashton Keynes anaerobic digestion site will require a Bespoke Environmental Permit. A Bespoke Permit requires that more extensive and detailed information is provided to the Environment Agency (EA) for their technical consideration to provide reassurance that these sensitive receptors have been carefully considered and any mitigations are included in the site design and proposed future operations.

Acorn will operate the Site in full compliance with their environmental management systems and the Environmental Permit. They will ensure the plant is also compliant with the Anaerobic Digestion Quality Protocol, the Biomethane Quality Protocol, and the British Standards Institute Publicly Available Specification for Digestate (BSI PAS110).

Food production and feedstocks:

Some responses expressed concern about the interaction between food production and the use of feedstocks for anaerobic digestion. However, Acorn commits to sustaining local agriculture and enhancing food production by use of crop rotations and digestate.

- Crop rotations and break crops are used to sustain crop yields by preventing pests and nutrient depletion in soils. It also discourages monocultural practices.
- Local producers are provided with another income stream when margins are under pressure due to reductions in EU agricultural support schemes.
- Digestate is an organic biofertiliser produced from anaerobic digestion which improves organic matter into the soil, improving soil structure whilst providing optimal NPK nutrients for healthy crop growth.
- With the supply of our digestate, we will help reduce dependency on international imports of carbon-intensive fertiliser of which, 28% are exported from Russia and Ukraine. Artificial fertilisers are highly expensive and dictated by natural gas prices, impacting food security. It is worth noting that the CF Fertiliser plant at Billingham has announced a proposal to permanently close their ammonia plant and will begin importing due to projected high natural gas prices in the UK.

All of Acorn's sites will be ISCC accredited which evidences the sustainable use of feedstocks and absence of interference with food production. In conclusion, anaerobic digestion helps to encourage regenerative agricultural practices.



Use of maize feedstocks

Acorn have carefully considered the potential for soil erosion when growing maize silage and put forward several measures to mitigate risk. These measures will reduce risk of soil erosion and soil particulate run-off and thereby prevent colloidal phosphates from entering surface waters. These measures effectively ensure all relevant legislation and good practice guidance are followed.

The measures, which will be recommended specifically to farmers growing maize, are summarised as follows:

- Heavier soils will be avoided.
- Steeply sloping fields will not be used.
- A Nutrient Management Plan for each field will be prepared based on information in RB209, considering recent (within 3-4 years) soil analysis and any applications of nutrients from digestate, other organic materials or synthetic fertilisers.
- Early maturing maize varieties will be chosen reaching target maturity in accordance with SW5 harvest before 1 October.
- The maize can be under-sown with grass using specific inter-row sowing machinery between the maize rows or the seed can be broadcast 6-7 weeks post maize drilling to enhance nutrient retention.
- Contractors will be co-ordinated to harvest fields in order of maturity.
- In the case of soil compaction, fields will be cultivated to create an open soil structure with uneven surface to allow interception and infiltration of rainfall thus helping to avoid runoff.
- Fields next to watercourses will be avoided or "no-spread buffer strips" will be in place, with grass margins to capture any sediment or organic material that may run off.
-

Local Benefits:

Including the benefits to agriculture previously described, there are additional local benefits which are detailed in this section. These benefits would include linkages with local land based colleges and universities such as Royal Agricultural University in Cirencester and the Wiltshire College & University Centre at Lackham, to provide apprenticeships and internships for students and staff.

Community benefit fund:

Acorn is eager to be a good neighbour to the communities surrounding the site at Ashton Keynes by supplying a community benefit fund. This fund will support the development of renewable energy projects within communities. We are open to proposals that contribute to the sustainability and wellbeing of the surrounding area.

Jobs:

There will be approximately 15 full-time roles created for local people by the development.

These will include:

- four to five on-site workers
- HGV drivers to transport the CO₂
- HGV drivers to transport the biomethane
- a digestate manager
- retention and creation of local, full time jobs for silage contractors, feedstock providers



The rest of the employment opportunities will consist of gas maintenance, electrical work and general maintenance roles. There will also be 10 part time roles created. There will be 100 temporary jobs created during the construction phase. Site workers will benefit from a programme of continuous professional development.

Biomethane and Energy Security:

As expressed in the 'Power up Britain 2023' government strategy, biomethane has a huge role in securing a stable, secure gas supply. Arguably, this has a huge role in local industry as domestic, green gas will mitigate volatile energy prices.

Green CO2:

Local and national businesses will benefit from the supply of green CO2, which is in a seriously short supply due to the war in Ukraine and closure of domestic fertiliser plants. Green CO2 can be used in the food and beverage industry but also the construction industry.

Air pollution and odour:

The air quality assessment analysed impact on local air quality and local amenity accounting for traffic impacts, construction dust, odour, and CHP emissions.

Both the construction phase and the operational phase concluded that there was no significant effect on residential and ecological receptors, including the SSSIs and several wildlife sites.

The embedded mitigation measures proposed, which have been considered within this assessment, are outlined below:

- Covering (sheeting) of silage within the clamps.
- Poultry litter and FYM to be enclosed within the Manure Shed (passively ventilated).
- The digestate lagoons to be covered.
- The separator building to be enclosed (passively ventilated).
- A site management system to ensure routine site cleaning measures are undertaken (i.e. spillages cleared and not left in situ).

A number of consultees were concerned about the impact of air quality on Ann Edwards School. Ann Edwards school was deemed as a high sensitivity receptor due to the length of residence of the pupils and staff. Following IAQM (2018) guidance, the pathway effectiveness was analysed and deemed to be ineffective based on distance, wind frequency, topography, and terrain. The assessment concluded that the odour exposure risk is negligible and will have an insignificant effect on the school.

Chapter 4 of the ES presents the Air Quality Assessment, which included an assessment of odour emissions and concluded that "The operational phase assessment concluded that the proposed development would result in a 'not significant' effect at human receptor locations with regard to odour, bioaerosols, dust, traffic, and other emissions to air".

There were speculations that Acorn will be processing food waste or sewage sludge. Acorn will be using agricultural feedstocks comprising a mixture of manure and silage from break crops. No food waste or human sewage will be processed at Ashton Keynes, therefore it is not appropriate to compare this proposed AD facility to others, which accept food waste and sewage.



Water course contamination:

Acorn will use two primary drainage systems, one for clean surface water runoff and one for contaminated water. All contaminated water defined as water which has had contact with our feedstock or from sections of the hardstanding area will be collected by a drainage system and reused within the anaerobic digestion process. Any clean run off, will be collected and filtered with a petrol interceptor before discharge at greenfield rates.

WC Drainage officers have reviewed the proposed site drainage design and have raised no issue with the proposed drainage strategy. Additional information has been requested on discharge rates and will be submitted to WC soon and available for public consultation. WC would not allow a drainage strategy which has the potential to discharge contaminated water or increase the risk of flooding on the highway. Nor would WC approve any application until they were confident that the drainage strategy met all required standards for water quality and discharge rates.

Flood Risk has been assessed in line with BS8533, taking account of national and local planning policy and guidance, and all potential sources of flooding to the Site have been considered. The screening assessment concluded that the Site lies entirely in Flood Zone 1. This study also accounts for the potential impact of climate change on weather systems.

Transportation

Concern in relation to additional HGVs on local roads was a key concern. WC Highways have examined the application and stated that “whilst the Wiltshire highway network serving the site would appear to have capacity to accommodate the proposed development traffic and is in compliance with appropriate traffic increase forecasts, the highways officer considers that more detailed information of the locations of the farms expected to use the facility is required to identify the routes likely to be used, and the impact on the local areas”. Acorn is working with SLR Transport Planners to produce a Transport Technical Note (TTN) to provide clarification and will include a feedstock catchment map, which confirms that the majority of the feedstock would be sourced within 10 miles of the application site.

In relation to accidents, Chapter 9 of the ES confirmed that the accident data obtained has been considered in detail and it has been determined that there are no accident patterns that could be attributed to poor highway design. The incidents recorded are attributed to human error, typically poor judgement.

Acorn would transport biomethane from the anaerobic digestion facility to its point of use, utilising biomethane-powered trucks, not diesel.

Transport Management Plan

If approved, the AD facility will be required to operate in accordance with a Traffic Management Plan (TMP), which would be secured as a Planning Condition, which could be enforced by WC.

The TMP would be produced and approved in writing by the local highway authority and planning authority prior to operation of the site and would ensure that site traffic is managed effectively as to not result in adverse impacts on the local highway.

Measures may relate to HGV routeing, vehicle scheduling, wheel wash and other measures to prevent debris on the local highway. The TMP will pay particular focus to crop harvest periods when traffic generation levels peak, ensuring that access junction activity is managed appropriately.



All site users will be made aware of the TMP, which will be provided during the contract agreement process, and must follow the measures stated.

Junction safety:

The Spine Road Junction has been assessed in the Transport Statement from all directions. The junction benefits from a wide bell mouth for two lanes of egress. The visibility is unobstructed, and the surface was observed to be free from defects. This is the expected route to be used by non-local HGVs to access the strategic road network.

Proposed access design:

The proposed access to the site has been designed with the required levels of visibility and has been designed as a two-way road to ensure capacity for worst case traffic flows and ensure no stacking onto Ashton Road. It has been designed in compliance with the relevant standards, including CD123 DMRB. The proposed access has also undergone a stage 1 Safety Audit.

Number of traffic movements:

The proposed traffic forecast indicates that for the majority of the year (10 months) the proposed development would generate 37-44 HGV/Tractor trips per day, which equates to 74-88 HGV/Tractor movements. This will increase to up to 80 trips per day over harvest periods. It is important to emphasise that existing farm operations occur within the vicinity of the site and many of these movements are redistributions on the local network to the site, not necessarily additional.

Tourism:

Wiltshire Core Strategy Core policy 54 is not directly relevant to Acorn's development as this refers to developments in outdoor or water-based sports. Regardless, Acorn's landscaping strategy shows considerable boundary planting and strengthening of existing planting, to reduce views into the site and the visual impact of the AD facility in the wider area. The facility will also require a bespoke environmental permit, which will impose strict controls on emissions to land, water and air, thereby ensuring there is no adverse impact on the local lakes.

Acorn has reached out to local stakeholders including Cotwolds Lakes Trust, Lake 62 LPS events and Ashton Fields Acorn developments on 30/11/2022 to inform them of the planning application however, no response was received. Acorn is willing to engage and provide further information to these parties on request.

Bat conservation

Bat surveys are continuing into late summer and the results will be provided to WC ecology in due course, for consultation with Natural England. WC cannot make a decision on any planning application until the bats surveys are complete and results are made available.

An ash tree near the site entrance has been identified as having the potential to be a bat roost. No tree work of any kind would take place until the presence/absence of the roost has been determined. Any work affecting a bat roost would need to take place under licence, by a qualified ecologist.

Biodiversity Net Gain:

Whilst the existing arable land would be lost, significant biodiversity net gain will be achieved by strengthening the existing native planting, the creation of wet grassland and nectar rich grassland



and new tree and hedge planting around the edges of the Site. These compensation, and enhancement measures will be implemented to ensure that the loss of arable land is compliant with legislative and policy guidance, with intended achievements in biodiversity net gains and the improvement in ecological value through wildlife friendly landscaping and invertebrate habitat features

New native tree and shrub planting (covering approximately 0.82ha) in the form of both a linear belt of trees to the north, west and south-west of the arc clamps and covered lagoons with smaller copses around the lagoons to the south would be implemented. Tree and shrub planting would provide long term visual screening for adjacent users of the PRow and 7 individual native trees would be introduced in locations where the width between structures is insufficient to establish a belt of trees.

228 linear metres of new native species-rich hedgerow with trees (approximately 18 in no) would be introduced to the north-western edge of the Site linking with existing hedgerows. This would provide long-term visual screening for adjacent users of the PRow. In addition, 1.34ha of shade tolerant species rich grassland would be created within the remaining perimeter standoffs and buffers. Where space allows to improve overall biodiversity, with 0.14 ha of wet grassland along the embankment of the land drain and to the southwest and south of the site.

In summary, this project is likely to deliver an increase in the habitat biodiversity value of the site of up to 19% and in the linear habitat (hedgerow) an increase in biodiversity value of the site of up to 102%. This level of net gain satisfies the future ambition of 10% BNG set out within the Environment Act.

Noise pollution:

Some consultees were concerned about the impact of noise pollution on the local tourism industry and existing and proposed residential developments. The Noise Assessment which supports the planning application concluded that sound resulting from the proposed AD facility would be largely unnoticeable at the noise sensitive receptors because of the low absolute level of emissions, the character of the sound in the residual sound climate, and the predicted internal level of emissions inside the receptor.

The development may marginally affect the acoustic character of the area during the most sensitive periods of the night-time of proposed operation, but not to the extent that there is a perceived change in quality of life

In accordance with overarching planning requirements, measures have been satisfactorily considered to mitigate and minimise adverse impacts on health and quality of life which can be secured on the development by conditional approval, if necessary, to include all reasonable standard mitigation of plant including using proprietary attenuation measures, suitable enclosures, and integral CHP stack silencers.

Light Pollution

Concern has been raised in relation to light pollution and its impact on amenity. Artificial lighting will be required for work during periods of reduced daylight availability and darkness, to meet safe passage, security and health & safety requirements. However, a lighting scheme has been designed in consultation with a light professional, and light effects towards surrounding light sensitive human and ecological receptors would be minimised through the controlled application of lighting in accordance with current best practice. The Lighting Assessment submitted with the application



concluded that, based on the Assessed Scheme of Lighting, it has been demonstrated that the proposed development will be compliant with the residential receptor criteria as set out in the Institution of Lighting Professionals (ILP) Guidance Note 01/21: The Reduction of Obtrusive Light. Specifically, the assessed lighting associated with the Proposed Development is compliant with the obtrusive light criteria as set out for ILP Environmental Zone E2.

Risk of avian flu and use of poultry manure feedstock:

Acorn is proactively working towards the reduction of agricultural emissions. Current Government legislation, including and not limited to Clean Air Strategy, Farming Rules for Water and Nitrate Vulnerable Zones are restricting the historical use of poultry manure as a direct fertiliser replacement. The inclusion of Poultry litter in the AD feedstock mix will provide nutrients and Biomethane production from its digestion and produce a nutrient rich fertiliser that can be applied to growing crops as a direct synthetic fertiliser replacement.

The Poultry litter will be collected from the point of production and transported directly to the Facility for treatment/processing. The vehicles used will be fit for purpose, sheeted vehicles to prevent any of the poultry litter from exiting the vehicle during transport. Once on site, the poultry litter will be delivered directly to the processing building that has a passive odour management system in place. The processing building is fully enclosed and will prevent any possible cross contamination. This will prevent access to the litter from any wildlife so increases biosecurity of the process, rather than the historic operation of the litter being tipped into fields prior to application to land.

The risk of an event such as Avian Flu has been assessed through the business and strategies are available to ensure the facility can continue to produce Biomethane in accordance with all requirements if there is a reduction of Poultry litter available.

Decommissioning:

Several people were concerned that the application did not include information regarding the decommissioning of the AD facility. We anticipate that Wiltshire Council would include a condition on any planning permission, requiring details of decommissioning, along the lines of the following:

In the event that the development ceases to operate and no gas is produced for export from the site for a period of 24 months, then the development shall be decommissioned and the land returned to its former use. All structures, plant and equipment shall be dismantled and any hard surfaced areas broken up. All materials from these operations shall be removed from the site. Prior to any works associated with this condition commencing, a scheme setting out the full extent of the proposed works, the retention of any planting/vegetation/water features and the proposed final ground levels, any seeding to be undertaken and a timetable for the completion of all the works shall be submitted to and approved in writing by the local planning authority. The decommissioning works shall be undertaken in accordance with the approved details.

Zone of Influence and cumulative impact assessment

All the technical assessments were based on a Study Area relevant for their discipline i.e. a 5km radius from the application site for the landscape and visual impact assessment (LVIA), to ensure that possible impacts of the AD plant were assessed beyond the application site boundary. The study areas typically took in land and existing and proposed developments within Gloucestershire as well



as Wiltshire and viewpoints were taken from a location close to the Saxon Meadows development, for the LVIA.

The potential impact of the proposed development on the local population and land use has been considered in the ES and the technical assessment which support the application and address traffic, air quality, noise, land quality, water, landscape, ecology and cultural heritage. No significant environmental impacts were identified, that would either individually or cumulatively, result in significant adverse effects on the local population or upon land use.

Prior experience in operating a plant:

Some public consultees were concerned that Acorn is only responsible for the development of the anaerobic digestion site. Acorn will take responsibility for the development, the construction and the operation of the plant. Although Acorn as a company has no track history of anaerobic digestion development, the team consists of professionals with decades of experience in developing anaerobic digestion sites from the energy, engineering, and agricultural sectors.

Health and safety risk:

Anaerobic digestion is an entirely safe and mature technology with over 650 anaerobic digestion sites operational in the UK. The Environment Agency states that there is a medium risk of explosion when there is a lack of risk mitigation procedures in place. Acorn will incorporate all appropriate risk management systems, and this will then define the risk as low, as per the EA methodology. This will also be required by Acorn's permit.

Environmental Impact Assessment

South Cerney Parish Council have stated that no environmental impact assessment (EIA) has been included in the application. This is incorrect as an EIA has been undertaken and the Environmental Statement (ES) has been submitted with the application. The technical assessments within the ES included a cumulative impact for their relevant discipline too.

Environmental permitting:

Acorn is aware that the site is situated in proximity to an SSSI, groundwater protection zones and a local nature reserve. As part of the environmental permitting process, Acorn will not be applying for a standard rules permit. Acorn will be applying for a bespoke permit to ensure we have no adverse effect on any sites of interest and therefore, will not be in breach of planning policy in relation to this.

Location Map:

We noted concern that the location map was not genuine and did not show the proximity of recent developments at Cotswold community or Saxon Meadows.

The OS base for the location plan was the current version available at the time the location plan was prepared and is a genuine document. SLR uses 50,000 scale mapping which is licensed for the whole of the UK and there is often a delay in the OS including newly built infrastructure. Nevertheless, all the technical team were aware of both the Cotswold Community and Saxon Meadows development at the time of writing their reports and visited the application site and the surrounding area, as part of establishing the baseline conditions for the application. Therefore, both developments were taken into account during the preparation of the ES.

We hope this letter provides an explanation to the public consultee's expressed concerns. Acorn Bioenergy wishes to work closely with the local communities and mitigate impact wherever possible.



Yours Sincerely,

CHGL

