

Ruaridh O'Donoghue and Adrian Smith
North Planning Team
Wiltshire Council
Chippenham

17 October 2025

Dear Ruaridh and Adrian,

PLANNING APPLICATION REF: PL/2023/03359
LAND OFF ASHTON ROAD, SOUTHEAST OF SOUTH CERNEY, ASHTON KEYNES,
WILTSHIRE, SN6 6QT

We refer to our above Application relating to the construction and operation of an Anaerobic Digestion plant and other associated development (the Proposed Development).

The Application was submitted in May 2023 and is pending determination. At this time there are no objections from statutory technical consultees, with the exception of the Council's Landscape Team.

Rationale for the Submission

Further to our meeting with you and the Council's Landscape Officer at the Site in March 2025, and our email correspondence of 23 July 2025, we are making what we anticipate will be our final design amendments (hereafter referred to as the 2025 Design Refinements) to the Application.

The 2025 Design Refinements comprise the following matters which were agreed with you and the Landscape Officer on site as delivering further scheme betterments:

- Reducing the height of the Chicken Manure Processing Building by 3.5m, from 13m to 9.2m to further minimise the overall visible massing of the Proposed Development when viewed in the early years from Ashton Road and the nearby public footpath (prior to the growth of mitigation planting);
- Including a native willow screen behind the proposed perimeter fence along a section of the site access bellmouth to reduce visibility of the Main Gate Kiosk and Staff Offices from passing traffic using Ashton Road; and
- Adding a native wildflower meadow adjacent to the northwest corner of the Site to maximise biodiversity net gain.

The 2025 Design Refinements follow on from the previous submission in October 2024 of more fundamental design changes (hereafter referred to as the 2024 Design Changes) that reduced the Proposed Development's scale, bulk and mass and substantially expanded the proposed landscape screen planting. We also took the opportunity to deliver changes to reduce the potential for operational odour impacts.

This submission describes the design evolution of the scheme as delivered by the combined 2024 Design Changes and 2025 Design Refinements.

This submission also responds to information requests from yourselves and members of the local community for further information regarding:

- The other regulatory regimes that would monitor and control the Proposed Development in the event planning permission was granted;
- How hazardous risks are controlled at the Site, including that posed by lightning strikes;



- The low carbon nature of the Proposed Development;
- The reasons why the Proposed Development is located on the chosen Site within a semi-rural farming area; and
- Updating the planning and energy policy position in light of the passage of time.

The Submission

In light of the above, we request that the determination of the Application now considers the information hereby submitted and listed below:

- Six amended Application Drawings showing the 2025 Design Refinements:
 - 29419 F104 Rev D Manure Processing Building – Plans as Proposed (GGP)
 - 29419 F105 Rev C Manure Processing Building - Sections and Elevations as Proposed (GGP)
 - 29419 F115 Rev B Elevations Views – Previous and New Planning Scheme (GGP)
 - 29419 F103 Rev C Site Elevations as Proposed (GGP)
 - 29419/P2/102 Rev P02 Proposed Levels (GGP); and
 - P24-1022_EN_010_B_A1 L Landscape Strategy Plan (Pegasus).
- A Planning, Design and Access Statement Addendum 2025 (PDAS Addendum 2025) that:
 - explains the design evolution of the Proposed Development
 - provides the requested clarificatory information on the existence and purpose of other regulating regimes that will control the proposed Development
 - provides the requested locational justification for the Proposed Development within an agricultural and semi-rural landscape
 - updates the planning policy and material considerations relevant to the determination of the Application given the passage of time
 - updates the Planning Balance section of the original PDAS 2023 in light of the above information and the other technical reports and information (see below) accompanying this submission
 - updates the conclusions of the PDAS 2023.
- A Lightning Mitigation Design Strategy outlining the importance of lightning protection systems, the different regulation systems and the Applicant's approach to designing and developing protection methods.
- An ES Addendum 2025 prepared by SLR Consulting Ltd, assessing the environmental impacts of the Proposed Development based on the combined 2024 Design Changes and the 2025 Design Refinements. This has been informed by:
 - An updated Air Quality Impact Assessment (AQIA), prepared by Earthcare Technical who authored the original AQIA;
 - An updated Noise Impact Assessment (NIA), prepared by SLR who authored the original NIA;
 - An updated Flood Risk Assessment (FRA); prepared by SLR who authored the original FRA
 - An updated Ecological Assessment by Bradley Murphy Design (BMD);



- An updated Biodiversity Net Gain Plan, prepared by BMD;
 - An additional visualisation of the Proposed Development from the Cotswold Community (Viewpoint 10) requested by the Council's Landscape Officer.
- An Updated Non-Technical Summary 2025 of the ES.
- An Updated Lighting Assessment Report 2025 prepared by Strenger, who authored the original report.
- A Locational Justification Report 2025 prepared by Savills, responding to requests from the Council for further information as to why the Site was selected for the Proposed within an agricultural and semi-rural area. Appended to this report is an Agricultural Economy Report 2025 also prepared by Savills, outlining the availability of feedstock within the local (10 mile) area, the strong demand for the natural digestate fertiliser and the decline in local dairy and cattle numbers raising concerns about the long-term sustainability of the current local farming systems.
- A Carbon Report 2025 prepared by the Applicant, setting out the negative carbon impacts the Proposed Development and the calculation confirming -29,801 tonnes of CO2 savings every year when considered using the latest criteria and on a "Cradle to Grave" basis.

The above information should be considered alongside all previously submitted information, unless otherwise stated.

Conclusions of the Submission

Overall, the Proposed Development would provide urgently needed low carbon, renewable energy and an extensive range of valuable other benefits including for the local farming community through agricultural diversification. The Proposed Development is an excellent example of the sustainable circular economy model that underpins national energy and planning policy. It has been robustly demonstrated to be acceptable in terms of its environmental, transport and amenity impacts with no statutory technical consultees objecting to the Application with the exception of WC's Landscape Team.

The design is of a high quality, responds positively to application consultation feedback, and sits well within its landscape context reflecting the fact that this consideration has been the key design driver for the Proposed Development. Both national and local policy support developments in rural areas – the Site is within a semi-rural area and meets the stipulated criteria for such a location to be acceptable.

It is considered that the many benefits arising from the Proposed Development lend it significant support which considerably outweigh its single identified adverse impact relating to landscape character. The planning policy analysis concludes that the Proposed Development could proceed in accordance with the NPPF, the development plan policies for the area and other relevant material considerations. Therefore, the planning application should be approved without delay.

Next Steps

We trust the above is clear, and we anticipate that a full re-consultation will be undertaken on the updating submitted documentation.

Please contact us should you have questions.



Yours sincerely,

Smthorpe

Sophia Thorpe LLB (Hons) MSc. MRTPI

Head of Planning
For and on behalf of Acorn Bioenergy Ltd

Enclosures:

29419 F104 Rev D Manure Processing Building – Plans as Proposed
29419 F105 Rev C Manure Processing Building - Sections and Elevations as Proposed
29419 F115 Rev B Elevations Views – Previous and New Planning Scheme
29419 F103 Rev C Site Elevations as Proposed
29419/P2/102 Rev P02 Proposed Levels
P24-1022_EN_010_B_A1 L Landscape Strategy Plan.
Planning, Design and Access Statement Addendum 2025 (PDAS Addendum 2025)
Lightning Mitigation Design Strategy
ES Addendum 2025, with appended

- Updated Air Quality Impact Assessment (AQIA);
- Updated Noise Impact Assessment (NIA);
- Updated Flood Risk Assessment (FRA);
- updated Ecological Assessment;
- Updated Biodiversity Net Gain Plan;
- Additional visualisation of the Proposed Development (Viewpoint 10).

Updated Non-Technical Summary 2025 of the ES.
Updated Lighting Assessment Report 2025.
Locational Justification Report 2025.
Carbon Report 2025

