



Planning, Design and Access Statement Addendum

Ashton Keynes Anaerobic Digestion Facility, Wiltshire

Acorn Bioenergy Limited

58 Marylebone High Street, London, England, W1U 5HT

Prepared by:

SLR Consulting Limited

Treenwood House, Rowden Lane, Bradford on Avon,
BA15 2AU

SLR Project No.: 402.065897.00001

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Basis of Report

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Executive Summary

SLR Consulting Limited (SLR) on behalf of Acorn Bioenergy Limited (the Applicant) has prepared this Planning, Design and Access Statement (PDAS) Addendum to accompany three minor design amendments to planning application ref: PL/2023/03359 (the Application) at land off Ashton Road, Ashton Keynes, Wiltshire, SN6 6QT.

The Application (submitted in April 2023) involves the proposed erection and operation of an anaerobic digestion (AD) facility, and associated infrastructure works (the Proposed Development). The Application is pending determination, and, at the time of writing, there are no objections from statutory technical consultees with the exception of WC's Landscape Team

The three minor design amendments (hereafter known as the 2025 Design Refinements) are being made in response to ongoing engagement with Wiltshire Council (WC) as Local Planning Authority (LPA) and the Council's Landscape Officer. The amendments relate to the reduction in height of the Chicken Manure Processing Building by 3.5m, the introduction of a native willow screen to minimise views into the Site from passing traffic using Ashton Road and adding a native wildflower meadow 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 PDAS Addendum describes the design evolution of the scheme as delivered by the combined 2024 Design Changes and 2025 Design Refinements. It also considers the conclusions of a new ES Addendum 2025 which assesses the environmental impacts of the Proposed Development based on the combined 2024 Design Changes and the 2025 Design Refinements.

The PDAS Addendum also considers the outcomes of a new Addendum (2025) to the Environmental Statement (ES). The ES Addendum 2025 has been prepared by SLR to more fully assess the environmental impacts of previously submitted design changes accepted by the LPA in October 2024.

Lastly, the PDAS Addendum also responds to information requests from WC 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.

Overall, the PDAS Addendum concludes that 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.

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.



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Appendix 1: 2025 Design Refinement Planning Application Drawings

Appendix 2: Updated List of Planning Application Drawings for Application Ref: PL/2023/03359



1.0 Introduction

This 2025 Planning Design and Access Statement (PDAS) Addendum accompanies planning application ref: PL/2023/03359 (the Application) to Wiltshire Council (WC) for the following Proposed Development:

‘Erection of anaerobic digestion (AD) facility, comprising silage clamps, digester tanks, lagoons, administrative buildings, landscaping and access’

The Proposed Development is located at land off Ashton Road, southeast of South Cerney, Ashton Keynes, Wiltshire, SN6 6QT (“the Site”).

The Application has been under consideration by WC since May 2023, with the Applicant responding to requests for further information and improving the design of the scheme since then.

It is envisaged that this submission, making minor design refinements and responding to the remaining outstanding queries, will conclude the engagement process and provide the final information necessary to enable the Application to be determined.

This 2025 PDAS should be read alongside the 2023 PDAS submitted with the Application in 2023.

1.1 Summary of Proposed Development

1.1.1 Overview

The Proposed Development occupies an area of approximately 7ha and would accept around 91,000 tonnes per annum (tpa) of feedstock in the form of rotation break crops (including silage, rye, maize and grass), straw, and farmyard manures from local farms together with a small proportion of poultry litter. Approximately 15% of the feedstock is from landowner’s own farm holding within the immediate vicinity of the Site.

The feedstock would be delivered to the Proposed Development by a mix of HGVs and tractor/trailers and treated in a fully enclosed anaerobic digestion process to generate c.10 million m³ of renewable, low carbon biomethane gas every year. This gas would be injected into the national gas grid at Banbury from just 2-3 biomethane fuelled tanker deliveries each day. The volume of renewable and low carbon gas produced is sufficient to meet the gas demands of 9,300 UK households every year, equivalent to more than all the homes in Cirencester.

The biomethane gas generation process produces two important by-products:

- Natural digestate fertiliser: every year the biomethane gas generation process produces c.120,000 tonnes of both liquid and solid digestate which is returned to local farmers to be applied to their fields;
- High grade CO₂ which is supplied to a wide variety of industrial, healthcare, food, beverage and other sectors.

The Proposed Development is located on a farm holding within the agricultural community and a semi-rural area so as to be proximate to the local farms it will serve, reducing transport distances and supporting the diversification of family farming businesses which are under severe financial strain.



Highway improvements to Ashton Road are also proposed, including creation of a new access, together with extensive new areas of landscaping and biodiversity enhancements. 40% of the total Site is proposed to be planted and used for visual screening and wildlife benefits.

The Proposed Development would operate for 25 years (is temporary) and would be decommissioned and the Site returned to agricultural use at the end of its operational life.

1.1.2 Benefits

The Proposed Development is an excellent example of the circular economy approach that is an underpinning pillar of sustainable planning; supporting the farming sector, strengthening the rural economy, tackling climate change and delivering significant biodiversity net gain:

- Provides certain income to local farmers for necessary rotation break crops that facilitate soil health and higher yields;
- Recycles farm wastes, and removes odorous farm manures;
- Generates significant quantities of renewable, low carbon energy (sufficient to meet the gas needs of 9,300 UK households every year (equivalent to more than all the homes in Cirencester)), helping to tackle climate change;
- Providing substantial CO₂ emissions savings, totalling -29,801 tonnes every year, and -745,037 tonnes over its 25-year operational life. This is the equivalent of removing 15,600 cars¹ from the road or planting 1.2 million trees²;
- The renewable gas produced supports greater UK energy security and more affordable energy bills;
- Produces natural digestate fertiliser for use on local farmland, further improving soil health and crop yields, and replacing expensive, artificial and imported fertilisers;
- Recovers high-grade carbon dioxide (CO₂) gas for use in the food, beverage, construction and medical sectors;
- Generates 100 FTE jobs over the construction period and 15 FTE jobs during operation, and 35 indirect and induced employment opportunities in the green energy sector;
- Location within a farm holding, within an agricultural area and close to the strategic highway network minimises transport movements. Nearly half (47%) of the traffic delivering to the Proposed Development is pre-existing farm traffic already of the local highway network;

¹ Based on the latest published figures from the UK Government, and assuming an average car drives 7,100 miles per annum (Department for Transport, Vehicle Mileage & Occupancy, last updated August 2025, 'All cars' category, Source: <https://www.gov.uk/government/statistical-data-sets/nts09-vehicle-mileage-and-occupancy#car-mileage>) and emits on average 0.26915kgCO₂e per mile (Department for Energy Security & Net Zero, Greenhouse gas reporting: conversion factors 2025, last updated August 2025, see 'Passenger vehicles' - Average Car, Unknown Fuel Type, Source: <https://www.gov.uk/government/publications/greenhouse-gas-reporting-conversion-factors-2025>), the 29,801 tonnes of annual CO₂e savings provided by this facility are equivalent to taking 15,595 cars

² Number of trees planted is based on a tree absorbing 25kg of CO₂ per year on average (Source: <https://ecotree.green/en/how-much-co2-does-a-tree-absorb>)



- Delivering a positive habitat biodiversity net gain of 20.33%, and also a positive change in hedgerow biodiversity net gain of 72.18%. This is well beyond the statutory requirement for developers to deliver a 10% net gain;
- Provides £20,000 per year of support for use in locally important and supported community projects (£500,000 over its lifetime) and supports the sustainable diversification of the farming rural economy.

1.2 Rationale for Submission

This PDAS Addendum 2025 has been prepared to:

- Explain the design evolution of the Proposed Development including a fundamental redesign in October 2024 to reduce its scale, bulk and mass and reduce potential odour together with the now submitted final 2025 Design Refinements, and confirm the proposed infrastructure components following those changes (see Section 2);
- Provide the requested clarifying information relating to the existence and purpose of the other regulating regimes that will control the Proposed Development in addition to any planning permission that may be granted (see Section 3);
- Provide the requested locational justification for the Proposed Development within an agricultural and semi-rural landscape (see Section 4);
- Update the planning policy and material considerations relevant to the determination of the Application given the passage of time since its original submission in 2023 (see Section 5);
- Update the Planning Balance section of the PDAS 2023 in light of the above information and the other technical reports accompanying this submission (including the 2025 ES Addendum) (see Section 6); and
- Update the Conclusions of the PDAS 2023 (Section 7).

1.3 Documents Accompanying this Submission

This 2025 PDAS Addendum accompanies the following submission documents:

- The cover letter making this submission to WC;
- Six amended Application Drawings showing the 2025 Design Refinements (see Appendix 1 to this PDAS Addendum):
 - i. 29419 F104 Rev D Manure Processing Building – Plans as Proposed (GGP);
 - ii. 29419 F105 Rev C Manure Processing Building - Sections and Elevations as Proposed (GGP);
 - iii. 29419 F115 Rev B Elevations Views – Previous and New Planning Scheme (GGP);
 - iv. 29419 F103 Rev C Site Elevations as Proposed (GGP);



- v. 29419/P2/102 Rev P02 Proposed Levels (GGP)³; and
- vi. P24-1022_EN_010_B_A1 L Landscape Strategy Plan (Pegasus).

An up-to-date list of all planning application drawings forming part of the Application is presented in Appendix 2 to this PDAS Addendum.

- 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 2024 Design Changes and the 2025 Design Refinements. This has been informed by:
 - i. An updated Air Quality Impact Assessment (AQIA), prepared by Earthcare Technical who authored the original AQIA;
 - ii. An updated Noise Impact Assessment (NIA), prepared by SLR who authored the original NIA;
 - iii. An updated Flood Risk Assessment (FRA); prepared by SLR who authored the original FRA;
 - iv. An updated Ecological Assessment by Bradley Murphy Design (BMD);
 - v. An updated Biodiversity Net Gain Plan, prepared by BMD;
 - vi. An additional visualisation of the Proposed Development from the Cotswold Community (Viewpoint 10) requested by WC's Landscape Officer.
- An Updated Non-Technical Summary 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 WC 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; and

- 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.

³ Site levels remain unchanged from those submitted in the October 2024 Design Changes. The updated Site Level plan shows a greater level of detail regarding site spot heights.



1.4 Application Process to Date

All submissions relating to this Application can be viewed online via the WC website using reference: PL/2023/03359.

The Application was submitted in April 2023 and validated in May 2023. The Application included an Environmental Statement (ES) (including a Non-Technical Summary) that assessed the following environmental topics:

- Air Quality (Chapter 4);
- Ecology (Chapter 5);
- Hydrology and Hydrogeology (Chapter 6) including a Flood Risk Assessment;
- Landscape and Visual (Chapter 7);
- Land Quality (Chapter 8) including a Preliminary Land Quality Risk Assessment;
- Transport (Chapter 9)
- Historic Environment (Chapter 10);
- Other Environmental Effects (Chapter 11);

In addition to the ES the Application was accompanied by:

- a Planning, Design and Access Statement;
- a Biodiversity Net Gain Assessment;
- a Preliminary Ecological Appraisal;
- a Noise Assessment;
- a Lighting Assessment;
- an Arboricultural Development Statement; and
- a comprehensive set of detailed planning application drawings.

Following WC's consultation on the Application, the Applicant responded through August to October 2023 to comments from the Council's Public Protection Team, Landscape Team, Highway Authority and Nature England as well as responding on drainage matters.

The Applicant then submitted the October 2024 Design Changes, which comprised a comprehensive set of updated planning application drawings (c. 27 in total) showing design amendments to reduce the bulk, mass and scale of the Proposed Development. These amendments delivered significant betterment to the landscape and visual impacts. Additional odour abatement measures were also introduced within the design.

An Ecological Technical Note to update the ecological baseline was provided in October 2024, alongside an updated Drainage Impact Assessment report to reflect the new site layout and an updated ES Chapter 7 Landscape and Visual and associated appendices.

In May 2025 the Applicant submitted further information in relation to a request from Natural England clarifying surface water matters and potential impacts of the Proposed Development on the Cotswold Water Park SSSI (now known as Cotswold Lakes). A response is awaited.

On 10 July 2025, a report setting out the findings of archaeological trial trenching on the Site in response to a request from WC's Archaeology Team was submitted. On 21 July 2025 WC's Archaeological Team confirmed the report was acceptable and it was approved.



1.5 Consultation Responses on Application

1.5.1 Technical Consultee Position

At this time there are no objections from statutory technical consultees with the exception of WC's Landscape Team.

Table 1-1 below summarises the consultee position on the Application at the time of writing this 2025 PDAS Addendum.

Table 1-1 Statutory Consultee Position on Application

CONSULTEE	RESPONSE
WC Landscape Team	Objection – inappropriate for the Site and location due to its detrimental impact on the landscape
Highways Authority	No objection subject to conditions
WC Public Protection	No objection subject to conditions
Lead Local Flood Authority	No objection subject to conditions
Natural England	Requested further information, which Applicant provided in May 2025. Response awaited.
Historic England	Advised of no comment
WC Ecology	No objection subject to conditions
Environment Agency	No objection
WC Conservation	No objection
WC Arboriculture	No objection
WC Archaeology	No objection



1.5.2 Local Community Position

The Parish Councils of Ashton Keynes, South Cerney and Somerford raise objections to the Proposed Development in relation to perceived traffic impacts, potential adverse impacts on Cotswold Lakes and residential amenity, environmental risks arising from pollution including to the nearby SSSI, hazardous process concerns, proximity to a Conservation Area and loss of agricultural land to the development of the Site. Similar concerns have been raised by the local elected representatives and local residents.

The Applicant has responded fully to these local objections and has demonstrated through evidenced environmental impact assessment that these concerns are unfounded. The robustness of the Applicant's position on these matters is reinforced by the fact that no objections have been raised to the Proposed Development by the Highway Authority, WC's Conservation Team, Historic England, WC's Public Protection Team, the Environment Agency, WC's Archaeology Team and WC's Ecology Team.

Further, the Applicant is confident that the further information it provided to Natural England in May 2025 will satisfactorily address its limited area of remaining queries. Natural England's response is awaited.

There is support for the Proposed Development within the local community, including from local farmers, with many submissions made favouring it due to:

- Its support for local farming, including through the provision of an alternative source of income to relying on environmental payments which are being phased out;
- Its ability to reduce the importation of fertiliser from overseas;
- Its delivery of local jobs;
- Its production of green energy;
- Its support for Britain's energy security;
- Its sustainable way of managing and recovering/recycling value from waste products;
- It being an alternative to unsustainable fossil fuels that contribute to global warming;
- Its ability to support tackling climate change;
- Its minimal negative impacts on the local community; and
- Its sustainability and being good for the environment.

1.6 Summary

The Application (PL/2023/03359) has been under consideration by WC since May 2023. The Applicant is making final design amendments and submitting requested additional information, ensuring all information necessary for the approval of the Application has been provided to WC.

There are no objections to the Application from statutory technical consultees, with the single exception of WC's Landscape Team. The design of the Proposed Development has been significantly improved to deliver landscape and visual betterments, together with additional odour prevention measures.

There is both local opposition and local support for the Application.



2.0 The Proposed Development

A summary of the Proposed Development together with its benefits is provided in Section 1 above. The project's fundamentals have not changed since the Application was submitted in 2023 (see Section 2.1 below).

What has changed however is that the design of the Proposed Development has been improved by the Applicant in response to consultation feedback. This is explained in Section 2.2 below. Section 2.3 confirms the description and dimensions of the redesigned infrastructure components.

2.1 Project Fundamentals

Table 2-1 below sets out the fundamentals of the Proposed Development that remain unaltered since the Application was submitted in 2023.

Table 2-1 Unchanged Project Fundamentals

AS SUBMITTED IN 2023	NOW (2025)
Site Area and Redline Area: c.7ha	Unchanged
Proximity to Sensitive Receptors	Unchanged
Description of Development	Unchanged
Technology process: anaerobic digestion	Unchanged
Feedstock Type/Tonnage: 91,000 tonnes per annum of rotational break crops, straw (70%), farm manures and poultry litter (30%)	Unchanged
Outputs: Renewable Biomethane Gas: sufficient to heat 9,300 UK households Natural Digestate Fertiliser: 120,000 tonnes per annum High Grade CO ₂ for use in industry: 13,714 tonnes per annum	Unchanged Unchanged Unchanged
Operational Life: 25 years	Unchanged
Construction Duration: 70 weeks	Unchanged



AS SUBMITTED IN 2023	NOW (2025)
Site Access: off Ashton Road from upgraded existing farm access	Unchanged
HGV/Tractor Trips	
Operational Hours: Staffed between 07:00 – 18:00 Monday to Sunday, extended during peak harvest	Unchanged
Monitoring system (SCADA) overnight	Unchanged
Feedstock and Digestate Movements: Mon – Fri 07:00 – 18:00 & Sat 07:00 – 13:00	Unchanged
Biomethane Tanker Movements: once every 12 hours, including overnight	Unchanged

2.2 Infrastructure Design Improvements

2.2.1 Original Submission May 2023

When the Application was submitted in May 2023 the key infrastructure components of the Proposed Development were as shown on the submitted Site Layout Plan (Figure 2-1) and included:

- Five large fully enclosed domed digester tanks, each approx. 17m tall, located along the lowest elevation of the Site down its eastern boundary adjacent Ashton Road.
- A Straw Processing Building located at the northwestern corner of the Site, measuring 8m from the ground to the top of the pitched roof;
- A Chicken Manure Processing Building, located at the northeastern end of the Site, measuring 13m from the ground to the top of the pitched roof;
- A Separator Building, measuring 8m from the ground to the top of the pitched roof;
- Two covered digestate lagoons in the southwestern corner of the Site;
- Three covered silage clamps, at 3.52m high located on the western and highest side of the Site;
- A Gas Flare, CHP Units (x2), and compressors each with a stack height of 9m;
- A Site Boundary Fence of 2.4m high; and
- Other technical equipment, parking bays, internal roads, weighbridge and office facilities.

The proposed planting focused on screening the Proposed Development from passing traffic on Ashton Road and users of the Public Right of Way (PRoW) running along the Site's western boundary:



- Offsite measures to allow existing hedgerows and hedgerow trees to the north, east, north-west and south-west of the Site to be retained, infilled where necessary and managed to a height of 2.5 to 3m;
- New linear belts of native tree and shrub planting (covering approximately 0.82 ha) to the north, west and south-west of the proposed clamps and lagoons and smaller copses;
- A 228m long new native species-rich hedgerow with c. 18 trees introduced to the Site's north-western edge linking with existing boundary hedgerows; and
- 1.34 ha of shade tolerant species rich grassland within the remaining perimeter areas and 0.14 ha of wet grassland along the land drain embankments.

Within the 2023 design, the hardstanding impermeable area extended to 4.52ha, meaning that 35% of the total available Site area comprised planting and habitat areas.

Figure 2-1: May 2023 Site Layout and Planting Proposals



2.2.2 October 2024 Design Changes

2.2.2.1 Reduced Scale, Bulk and Mass

In response to representations made during the consultation period on the Application, the Applicant amended the design of the Proposed Development in October 2024 (see Figure 2-2) to fundamentally reduce its scale, bulk and mass and to expand the proposed landscape screen planting. This was made possible by the Applicant selecting a different anaerobic digestion technology provider. Amongst other variations, the updated technology choice uses fewer and lower digestion tanks and is contained within lowered Site ground levels which, in combination with new extended landscape planting proposals delivered significant betterments from a landscape and visual impact perspective.

The 2024 Design Changes were also accompanied by new drainage plans and a Drainage Impact Assessment.

Figure 2-2 October 2024 Site Layout and Planting Proposals

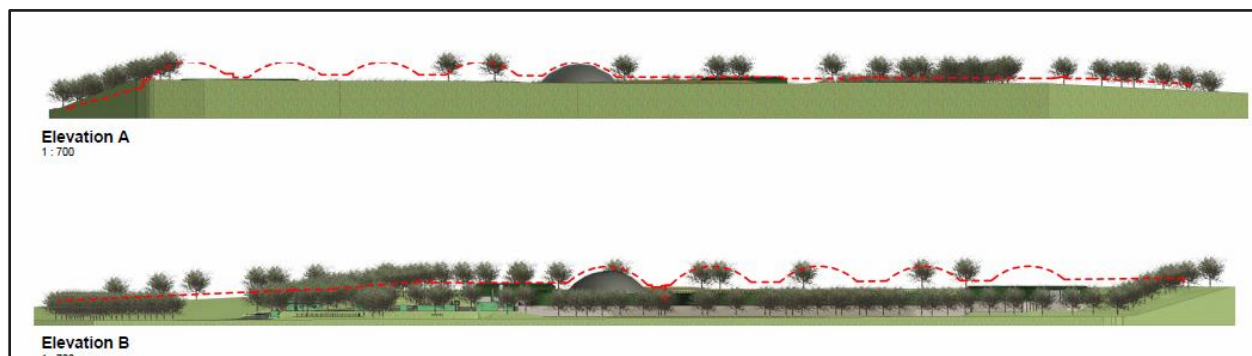


The principal improvements delivered by the 2024 Design Changes are summarised below.

- The massing of the digester tanks along the Site's eastern boundary was reduced by proposing just three tanks instead of the original five tanks;
- The scale of the digester tanks was also significantly reduced. Originally the five tanks were all domed and rose to a height of 17m. The revised scheme proposes two flat tanks at just 9m tall and only one domed digester tank at 16.5m;
- The digester tanks were further offset from the Site boundary with Ashton Road to provide space for a substantial belt of screen planting to be provided behind the existing mature hedgerow;
- Proposed ground levels were reduced within the Site to allow the digester tanks and feedstock reception buildings to be "lowered" further reducing their perceived scale within the landscape;
- Planting substantially greater areas and depths of woodland around the Site boundaries, and also on low level earth bunds with gentle slopes within the Site to further screen the Proposed Development;
- Existing hedgerows and trees are proposed to be retained as previously proposed but would now be enhanced to a greater degree with new planting;
- Planting a species rich meadow grass mix in the more peripheral areas of the Site; and
- Consideration of Environmental Colour Assessment Principles⁴ to minimise the appearance of buildings and structures in the landscape by using a neutral palette.

The full extent of the reduction in scale, bulk and massing delivered by the October 2024 Design changes is shown on submitted drawing 29419 F115 Rev B Elevation Views – Previous and New Planning Scheme (extracted at Figure 2-3 and Figure 2-4 below):

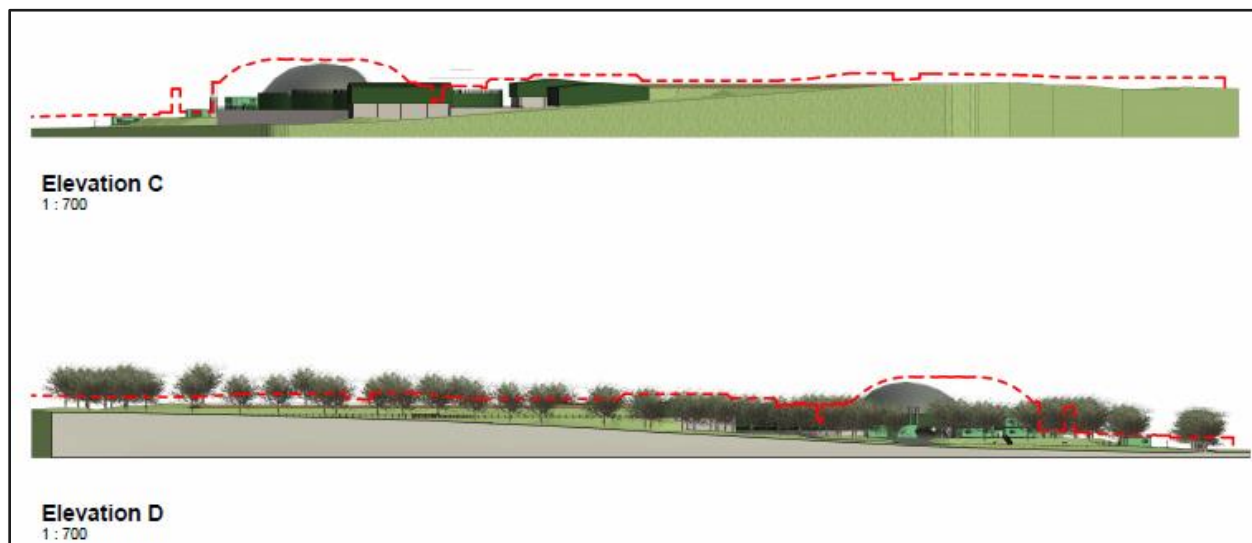
Figure 2-3 Original Design (Red Dotted Line) and October 2024 Design



⁴ Landscape Institute Technical Information Note 04/2018



Figure 2-4 Original Design (Red Dotted Line) and October 2024 Design



2.2.2.2 Improved Odour Controls

The Applicant, when improving the design from a landscape and visual impact perspective, also took the opportunity to deliver changes to reduce the potential for odour impacts from the operation of the Proposed Development. These improvements are set out in Table 2-2 below and are further explained in the 2025 ES Addendum⁵.

Table 2-2 Comparison of Potentially Odorous Emissions from 2023 to now

2023 DESIGN	2024 DESIGN	IMPACT	2025 DESIGN
Manure transported from the Manure Building to external feed hoppers – potential source of odour emission outside.	Manure fed inside via a feed hopper inside the Manure Building. Therefore, odour release treated by the building's air extraction and abatement system.	Reduction in odour. No manure external to the enclosed Manure Building. Only low odour crop silage would be loaded in the external feed hoppers.	No change to 2024 Design – improvements retained

⁵ Refer to the 2025 ES Addendum, Air Quality Impact Assessment Addendum October 2025



2023 DESIGN	2024 DESIGN	IMPACT	2025 DESIGN
Liquid feedstock tank would be able to vent passively, so there would be passive emission of odour.	Air displaced from the liquid feedstock tank during filling will pass through a carbon filter to treat and reduce odours before it is released to air.	Reduction in odour.	No change to 2024 Design – improvements retained
2No. 10,000m3 slurry bags with vents, so there would be passive emission of air containing odour.	2 No. 8,000m3 covered digestate lagoons with vents including a carbon filter, so passive emission of air containing odour would be abated.	Reduction in odour. Any residual odour emissions from digestate storage will be further reduced before release to air.	No change to 2024 Design – improvements retained
When tankers are filled with digestate for spreading some air can be displaced from the tank which will vent, unabated to air.	Air displaced from the tanker will be passed through a carbon filter to reduce odours before it is released to air.	Reduction in odour.	No change to 2024 Design – improvements retained

2.2.3 2025 Design Refinements

The Applicant met with WC's Planning Team and Landscape Officer on Site on 7 March 2025 to explain the October 2024 Design Changes and to seek further advice (on a without prejudice basis) as to whether additional improvements could be achieved.

It was agreed that the following three design refinements (see Figure 2-5 below) would deliver further 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.

These improvements are shown on the now submitted planning drawings listed in Section 1.3 above.



Within the 2025 design, the hardstanding impermeable area extends to 4.18ha, meaning that 40% of the total available Site area comprises planting and habitat areas, and increase of 5% from the 2023 design.

Figure 2-5 October 2025 Design Refinements



2.3 Infrastructure Components 2025

Table 2-3 below confirms the complete up to date list of the primary components of the Proposed Development, as shown on the submitted planning application drawings set out Appendix 1. Table 2-3 supersedes Table 4-1 in the 2023 PDAS.



Table 2-3 Description and Dimensions of AD Facility Components

ELEMENT	DESCRIPTION OF PLANT	DIMENSIONS
Silage Clamps (x3)	Each silage clamp will be constructed with pre-cast 3.5m high concrete panels that are filled with earth for additional strength. The clamps will have a hard wearing and acid resistant rolled asphalt floor. The clamps will have a liquid drainage and collection system for dirty liquid run-off. This will be pumped directly into the dirty water tanks for feeding back into the process.	Clamps 1 & 2: 101m long x 35m wide x 3.5m high. Clamp 3: 124m long x 35m wide x 3.5m high.
Straw Processing Building (x1)	Straw storage building including bunker and processing. To be partly clad in green under a fibre cement roof or clad using an alternative colour agreeable to the LPA.	Building is 43m x 23m x 9.2m to ridge
Chicken Manure Reception Building (x1)	All unloading and storage of poultry litter and farmyard manure will be carried out within this building [which is equipped with a dedicated air extraction and abatement system. To be partly clad in green under a fibre cement roof or clad using an alternative colour agreeable to the LPA.	26.0m x 19.5m x 8.1m to eaves, 9.2m to ridge, stack exhaust 10.2m.
Feeder Hoppers (x3)	Feedstock is fed into the feed hoppers (one for straw and 2 for silage). Once the feed is loaded it exits and proceeds for further feed pre-treatment before pumped to the digesters. To be green or an alternative colour agreeable to the LPA.	Each 11m x 3m x 3.5m
Process Liquid Tanks (x4)	Storage of liquid feedstocks (fitted with emissions abatement) and contaminated dirty water run-off to be reused in the process. To be clad in green or an alternative colour agreeable to the LPA.	Each measure 8m high and 8m diameter
Primary and Secondary Digester Tanks (x2)	Tanks take feedstock, pumped from upstream processing equipment, with sufficient dry matter content. Generated biogas will flow to the digester headspace before treatment to downstream equipment. To be clad in green or an alternative colour agreeable to the LPA.	9m straight wall height, flat topped. 45m diameter.
Pump room container (x1)	Contains pumps to facilitate substrate/digestate between the final storage tank and digesters. Feed dosing undertaken here along with heat distribution systems to main equipment.	13m x 3m x 3m
Post Digester Tank (x1)	Generated biogas will flow to the digester headspace before treatment to downstream equipment.	Total height to top of dome: 16.5m. 34m diameter
Separator Building (x1)	The separator within the building would extract solids from the digestate before the liquid digestate is pumped to the digestate lagoons. The solid digestate is stored within the building prior to removal off-site.	26m x 20m x 9m to ridge height



ELEMENT	DESCRIPTION OF PLANT	DIMENSIONS
Pasteurisation Tanks (x4)	The pasteurisation tanks would treat the fermented feedstock prior to it being pumped into the digestate lagoons.	Each tank is 3m diameter x11m high
Covered Digestate Lagoons (x2)	Used to store liquid digestate prior to export as natural fertiliser. The lagoons will comprise a reinforced HDPE liner with a floating HDPE cover, with a leakage detection and geotextile protective lining. This protective lining will sit within a bunded earthen lagoon wall. There is one emissions outlet per lagoon and each vent is fitted with emissions abatement	Storage capacity 2 x 8,000m³.
Enclosed Gas Flare	For infrequent use as safety device to burn off any excess gas.	Stack height 10.5m. Flue diameter 1.8m
Biogas Upgrade Unit	To clean and pressurise the gas prior to transfer to the gas grid. CO ₂ vent is connected from gas upgrade unit to the CO ₂ Capture Unit	Footprint 26 x 9m x 3m. Vent height 7.5m.
Propane Tank (x1)	The propane tanks will add propane to the biomethane gas as required.	25ft below ground tank SSL +93.50
Compressors (x2)	Compression of gas before injecting into road tankers. Located beside lorry bays	Each 6.5m x 3m x 3m, stack 9m
CO ₂ Capture Unit and Tanks	Captured CO ₂ stored in tanks to then be transported on road tankers for utilisation or storage.	Capture Unit: 10m x 16m x 4.75m Tanks x 2 each 13m long x 3m diameter x 3.4m high
Combined Heat and Power (CHP) Units (x2)	To provide the facility with power and heat. One unit would be fuelled by biogas from the digestion process and the other by imported natural gas. To be clad in juniper green or an alternative colour agreeable to the LPA. Associated equipment includes heat exchangers and pumping systems.	Each 13m x 3m x3 with stack 9m
Vehicle Parking	HGV parking x 5 8 bay car parking for visitors and office	
New Site Access Roads	70m long on site hard surfaced access road	70m long
SCADA Alarm Monitoring Systems	Supervisory Control and Data Acquisition (SCADA) system that will provide an interface for the operator to control the plant, and capture/record all data produced by the process	N/A



ELEMENT	DESCRIPTION OF PLANT	DIMENSIONS
Rainwater Harvesting Lagoon (x1)	To collect clean surface run off from the site.	Capacity approx. 2,000m ³
Site Boundary Fencing/Enclosures	Site access and boundary secured by post and wire fencing. Main compound secured by V mesh fencing. Wildlife stock fencing around the rainwater lagoon.	2.4m high
Weighbridge and Site Office Welfare Office Unit (x2)	To record incoming and outgoing deliveries	4 x 40ft containers on top of each other.

2.4 Updated Landscaping Strategy

The updated Landscape Strategy Plan (Drawing No. P24-1022_EN_010_B_A1), dated 12/06/2025 supersedes the 'Landscape Masterplan' (Figure 6 of the Landscape and Visual Impact Assessment in Chapter 7 of the 2023 ES.

A copy of the updated Landscape Strategy Plan is attached at Appendix 1 to this PDAS Addendum.

2.5 Updated Lighting Assessment 2025

An Updated Lighting Assessment (October 2025) has been prepared and submitted to reflect the improved design and site layout of the Proposed Development, which includes the following drawings:

- SK-01 Residential Receptor Location Plan;
- SK-02 Assessed Scheme of Lighting; and
- SK-03 Light Spill.

The assessment concludes that as a result of embedded design mitigation measures and by following accepted guidance, the Proposed Development avoids light pollution and is acceptable from a local amenity perspective.

2.6 Lightning Mitigation Design Strategy

A Lightning Mitigation Design Strategy has been prepared and submitted to explain the importance of lightning protection systems for operational biomethane gas generating facilities and the regulations and standards they must meet. It explains the various forms of protection methods available and how they work, and how important a bespoke site design is to deliver effective protection to take account of the height of the tanks, the selected technology provider, the presence of people, surrounding topography and local weather conditions. The Applicant does not support a generic lightning protection approach, instead favouring assessment post any



planning approval, when the detailed design phase has been completed and an accurate evaluation of real process conditions is possible.

2.7 Summary

The Proposed Development has been enhanced through an iterative design process that has benefited from consultation feedback, being landscape led and utilises the latest technology to reduce impacts to acceptable levels.



3.0 Additional Regulatory Controls

It is important to consider that, in the event planning permission is granted for the Proposed Development, other regulatory regimes will also separately monitor and control it.

3.1 Planning Policy on other Regulatory Controls

National planning policy is clear that the focus of planning decisions “*should be on whether the proposed development is an acceptable use of the land, rather than the control of processes or emissions (where these are subject to separate pollution control regimes)*” (paragraph 201 of the National Planning Policy Framework (NPPF) 2024). The NPPF confirms that planning decisions should assume that these separate regulatory regimes will operate effectively.

3.2 Other Regulatory Regimes

In addition to the standard health and safety regulations that would apply to the construction and operation of the Proposed Development, there are two other substantial regulatory regimes that will effectively monitor and control in addition to any planning permission:

- An Environmental Permit, issued by the Environment Agency; and
- An Hazardous Substances Consent, issued by the Hazardous Substances Authority.

3.2.1 Environmental Permit

Before commencing operations, the Proposed Development will require an Environmental Permit (EP) to be granted.

3.2.1.1 Background to Environmental Permit

In the event planning permission is granted, the operation of the Proposed Development would be strictly regulated by the Environment Agency (EA) as a waste management operation under the Environmental Permitting Regulations (England and Wales) 2016, to ensure it is operated within defined environmental guidelines throughout its 25-year lifetime. The EA is the statutory expert body who will regularly inspect and regulate the operation of the Proposed Development with a particular focus on emissions to land, water or air as well as odour, noise and vibration, and pests.

The EA would regulate the Proposed Development through an Environmental Permit (EP). Should planning permission be granted for the Proposed Development, a permit application to the EA will be submitted. The application would first undergo ‘duly making’ checks, then full assessment or ‘determination’ before a permit is issued. The process is rigorous and robust. If the EA are not fully satisfied by the site design or information provided, they may request changes to the site design and/or management systems or refuse the application.

The EP provides a set of rules under which the Proposed Development must be built and operated. The EP limits the amount of waste that can be accepted each day and makes sure that the operations comply with Best Available Techniques (BAT) conclusions and BAT Associated Emissions Limits. These techniques and limits are laid out in the Best Available Techniques



Reference Document (BREF) for Waste Treatment; Industrial Emission Directive 2010/75/EU) Integrated Pollution Prevention and Control) 2018.

3.2.1.2 Odor Controls

In particular the EP dictates that activities are free from odour at levels likely to cause pollution outside of the site boundary. A written environmental management system will be in place which includes the need for a comprehensive Odour Management Plan (OMP) and daily odour monitoring, as well as daily checks and monitoring for all aspects of the wider site operation.

3.2.1.3 Applicant's Experience of EP

The Applicant is currently successfully operating its Three Maids AD plant at Winchester under the terms of the issued EP. This follows a rigorous assessment by the EA of the technologies employed the site infrastructure and site operations.

The Applicant's planning consented Horse Close AD plant at Courteenhall in Northamptonshire is under construction and is currently undergoing the final stages of EP determination. It is anticipated that the Horse Close site will become operational in 2026.

3.2.2 Hazard Risk Regulation

Before commencing operations, the Proposed Development will require Hazardous Substances Consent (HSC) to be granted.

3.2.2.1 Background to Hazardous Substances Consent

The purpose of the HSC is to ensure necessary measures are taken to prevent accidents and limit their consequences to people and the environment and enables any breaches of control to be dealt with quickly and effectively. HSC also ensures that the residual risk to people in the vicinity or to the environment is considered before a hazardous substance is allowed to be present in a controlled quantity. The system of HSC does not replace requirements under health and safety legislation, the two operate in tandem alongside the planning permission and the EP, meaning the Proposed Development will be strictly regulated through four tiers of control.

The Hazardous Substances Authority (HSA), which is usually the local planning authority (WC), is responsible for deciding whether to grant or revoke HSC. The HSA is advised on the level of risk by the Control of Major Accident Hazards (COMAH) competent authority. For the most cases the COMAH competent authority is the independent Health and Safety Executive (HSE) and the Environment Agency (EA), acting jointly. They advise the HSA on the nature and severity of the risk to persons in the vicinity and the local environment arising from the presence of the hazardous substance at an establishment.

Should planning permission be granted for the Proposed Development, an HSC application to the HSA will be submitted.

3.2.2.2 Risk Analysis in HSC Assessment

When HSE is consulted on a planning application for HSC, it undertakes an analysis to consider the hazards and risks which would be presented by the hazardous substance(s) to people in the vicinity, and on the basis of this to advise the HSA whether or not consent should be granted.



The risk analysis is based on the specific potentially hazardous substances stored on site, their quantity and where they are located.

In the case of the Proposed Development this will include biogas in the digester tanks and upgraded biomethane in the road tankers.

3.2.2.3 Applicant's Experience of HSC Approval

On the basis of such a thorough assessment by the HSA and the HSE, the Applicant has been successfully granted HSC consent at its existing two anaerobic digestion (AD) developments at Three Maids (Winchester) and Horse Close (West Northamptonshire). In both cases, the HSE reached the same conclusion following its risk analysis:

"HSE has concluded that the risks to the surrounding population arising from the proposed operation(s) are so small that there are no significant reasons, on safety grounds, for refusing Hazardous Substances Consent."

Given the similarities of the Proposed Development to these two facilities, it is reasonable to conclude that the HSE will reach the same conclusion in relation to the Application.

3.3 Summary

National planning policy is clear that the planning regime must not duplicate control enforced under separate regulatory regimes. Planning decisions should assume that these separate regulatory regimes will operate effectively and not seek to duplicate them.

Overall, the Proposed Development will be strictly regulated through four distinct and enforcing regimes, all operating in parallel: planning, environmental permitting, hazardous substances consent and health and safety regulations. The Applicant has demonstrable experience in securing and complying with all such regulations.



4.0 Locational Justification

This section of the 2025 PDAS Addendum explains in more detail⁶ why the Applicant selected the location of the Site. It responds to the questions raised during the processing of the Application relating to “why is the Proposed Development here”.

4.1 Rural Location and Circular Benefits

The location of the Proposed Development within a semi-rural area (see below) is not at all unique to the Applicant's proposals. The UK's Biomass Strategy 2023 states that the large majority of the country's biomethane gas generating facilities are in rural areas, and such facilities are supported by Government as a means to deliver energy security amongst other many benefits:

“Our analysis suggests that over two thirds of existing biomethane plants are located in rural areas, with 80% of all GB plants located in areas with a lower-than-average Gross Value Added. Supporting the development of this industry therefore benefits the wider economy by creating jobs...and helping to diversify and grow the rural economy” (paragraph 156).

4.1.1 Semi-Rural Location

The Site is within a modern agricultural landscape which contains significant industrial activity including mineral processing to the southeast of the Site at Aggregate Industries, extraction and progressive restoration at Shorncote Quarry ca.500m to the west, the Cirencester Wastewater Treatment Works ca.950m to the northwest, and Evergreen Industrial Park within South Cerney ca.530m to the east.

These industries contain major infrastructure and are locally detracting features in the landscape with indirect effects upon landscape character resulting in HGV traffic along Ashton Road, adjacent to the Site. Existing vegetation filters views of these urbanising land uses in the flat landscape, demonstrating that large scale industrial and mineral extraction operations can be accommodated with only localised adverse effects.

The Proposed Development is therefore located in a semi-rural area which successfully accommodates a range of uses that are not unexpected outside of settlement areas.

4.2 Applicant's Overall Locational Rationale

In general, the Applicant's rationale for the location of all its biomethane generating plants, including the Proposed Development, is driven by the operational requirements of the facility together with an understanding of, and compliance with, strategic and local planning policies to deliver overall sustainable development as required by national planning policy.

The operational requirements are set out below in this section, and Section 6 considers the compatibility with the relevant planning policies that drive the choice of location.

⁶ Site selection is explained in Section 3 of the 2023 PDAS



4.3 Operational Requirements

4.3.1 Access to Local Farms

The Proposed Development requires 91,000 tonnes per annum of mainly locally sourced farm feedstock to primarily produce renewable biomethane gas, a source of affordable, secure and sustainable energy strongly supported by up-to-date Government energy and planning policy.

In addition, the Proposed Development produces 120,000 tonnes per annum of natural digestate fertiliser suitable for use on nearby farmland. These are the principal outputs of the Proposed Development that drive its locational requirements.

The nature of the Proposed Development, relying as it does on agricultural feedstock comprising break crops, straw, slurry, farm manure and poultry litter, strongly suggests that the project should be in a rural location where this can be supplied locally. This aligns strongly with the need for local farmers to protect their businesses and livelihoods through embracing a source of urgently needed and valuable farm diversification income.

Equally, the produced natural digestate fertiliser that would be distributed back to local farmers to improve their field soil quality and boost crop yields further underlines the need for the Proposed Development to be located within an agricultural setting. Generally, soils in this locality would benefit from the use of the digestate fertiliser by increasing the organic matter and drought resilience of the soil. Farmers currently rely heavily on imported artificial fertilisers e.g. from Egypt), which are more expensive and less sustainable than natural digestate fertilisers, enabling the Proposed Development to help local farmers to improve their soil and decrease their costs.

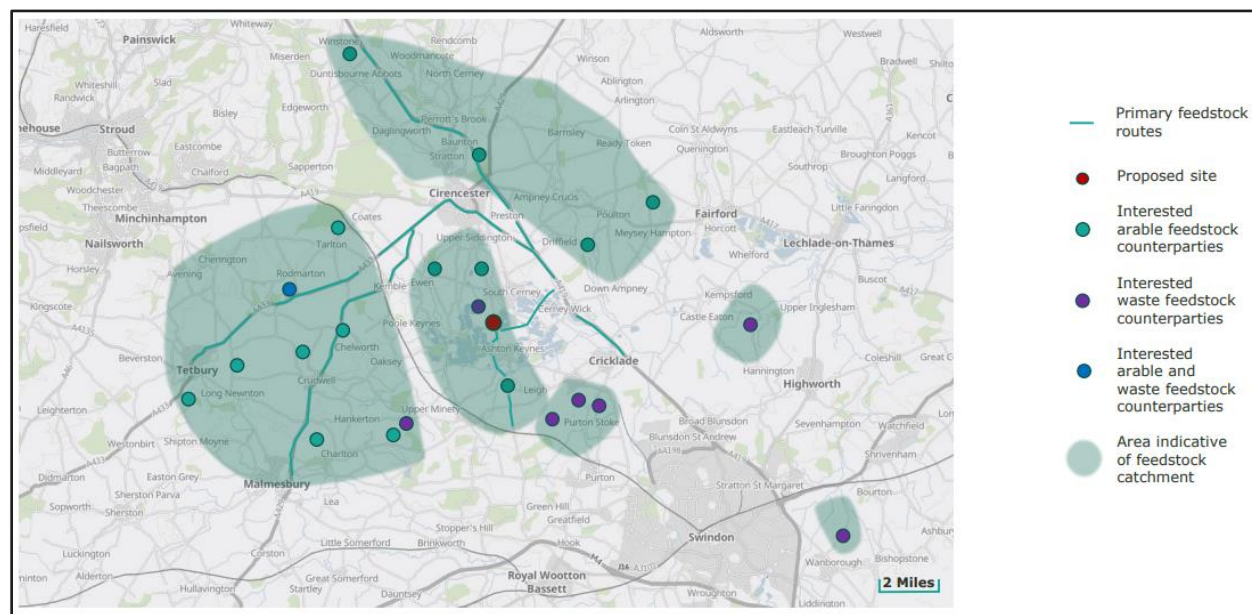
Therefore, the Applicant sought a site for the Proposed Development in a location where there is a large existing local catchment area of farms where the necessary feedstock could be sourced, and a receptive local market for the digestate fertiliser is present.

4.3.2 Minimising Transport Distances

The Site's location within the centre of the feedstock catchment area (see Figure 4-1 below, submitted to WC in 2023) means it is well located to minimise transport distances by providing a local outlet for agricultural feedstock plus the supply of local natural fertiliser. The Proposed Development also opens important farm diversification opportunities to as many local farmers as possible.



Figure 4-1 indicative Feedstock Counterparties in the Local Area



4.3.3 Pre-Existing Agricultural Traffic on Local Roads

Another logical reason for an agricultural location is that much of the proposed feedstock for the Proposed Development is already being transported on the roads around the Site by farmers going about their daily business, meaning this vehicle traffic already substantially exists on the local road network. This is considered in greater detail in the 2023 Transport Statement (TS) accompanying the Application and summarised below.

The TS estimates that the local farms with a registered interest in supplying feedstock to the Proposed Development are already generating approximately 5,843 annual loads (11,686 two-way vehicle trips) on the highway network, associated with the movement of their yields and purchase of fertilisers etc.

This equates to 47% of the total vehicle trips for the Proposed Development and would mean that almost half of the associated vehicle movements would not be “new movements”, but rather a re-distribution of existing agricultural movements on the highway network. This could only be achieved from an agricultural location within the feedstock source area.

4.3.4 Site Size and Compatibility with Surroundings

The engineering process of the Proposed Development (including health and safety design considerations) drives a minimum site size area requirement of 6 hectares, with further land typically needed for highway access, landscaping and biodiversity enhancement. The Application site is c. 7 hectares.

Such a relatively large site sizing requirement tends to direct biomethane generating facilities into rural locations within farm holdings as opposed to, for example, utilising allocated employment/industrial land on the edge of settlements. Furthermore, allocated and highly valued employment/industrial sites are often stringently protected by local planning policies to prevent



their loss to uses such as the Proposed Development, which are often seen as being incompatible given the agricultural nature of their operations.

4.3.5 Accessibility to Gas Injection Network

In the Wiltshire/ Gloucestershire border area the only high-pressure gas pipeline runs through the Cotswold National Landscape area chiefly, save for a spur that runs to the south of Cirencester.

The Cotswold National Landscape Area is a sensitive designation with a high level of protection at a national level. It is not considered suitable for a project such as the Proposed Development.

The gas pipeline spur is entirely coincident in location with the planned urban expansion of Cirencester and as such is not considered suitable for the Proposed Development. Other short parts of the pipeline outside the National Landscape area have relatively poor road access.

The Applicant owns and operates a gas injection hub at Banbury, located just 47 miles away. The Proposed Development would use biomethane-fuelled road tankers to transport gas to the Banbury gas injection hub, which has capacity to inject all gas generated by the Proposed Development. This provides the solution for grid injection, thus making possible the development of this Site which in all other respects is locationally ideal for a biomethane gas generation facility.

The Proposed Development would require just 2 biomethane tankers over every 24 hours to transport all the gas.

4.3.6 Good Highway Access

The Cotswold Lakes (CL) is one of the principal features of the Wiltshire/ Gloucestershire area in the vicinity of Cirencester. The CL, an extensive area of artificial lakes, is the product of mineral extraction particularly that associated with the construction of the M4 motorway in the 1960s and urban developments in Swindon and along the Thames Valley. More recently it has become a focus for recreation and conservation activities.

Quarrying activity, which remains active in parts of the CL, generated the need for extremely good road access to be built. This is in the form both of an internal spine road and connected haul roads, and also of the high-quality interconnection to the A419 to the east of the CL. This junction was upgraded to a full two-way slip road junction on dualling of the road between near Gloucester and the M4 in the 1990s.

Via Ashton Road and Spine Road East the Site connects to the national strategic road network on good quality roads designed for the passage of heavy goods vehicle traffic.

At no point between the site entrance and the A419 dual carriageway does this route pass through villages. No residential properties have access directly from the route.

There are very few if any other locations in the Wiltshire / Gloucestershire border area near Cirencester where such access to the national highway network can be achieved without the intervening route passing through villages or past residential properties. There are certainly none with better road access within the feedstock area identified. Easy access from the A419 as it runs broadly northwest/ southeast through the area is a key requirement for the Proposed Development.



4.4 Summary

The Site is located within a semi-rural area which already successfully accommodates medium to large scale infrastructure. The Proposed Development is advantageous to the rural economy because it will in effect replace the regionally declining dairy cow sector with a new market for feed crops, grass, and straw grown locally. This would minimise the adverse effects of the decline of small-scale dairy farming on the established landscape and rural farming economy.

The Proposed Development serves an agricultural community and so must be close to the local farms it is supporting. By being on a farm holding and within a farming area, the Site reduces transportation distances and overall transport movements and supports the diversification and viability of local family farms which are under severe financial strain which threatens their continued existence.

The Site is well served by the strategic highway network, and at no point between the access to the Proposed Development and the A419 dual carriage would its associated HGV or tanker traffic pass through villages.

The Site is not located within a protected landscape, ecological or heritage asset, and its impact on the nearby Cotswold Lakes SSSI, the Local Nature Reserve (Coke's Pit), closest residential properties and other sensitive receptors has been rigorously assessed and found to be acceptable.

It is concluded that the Site is an acceptable and sustainable location for the Proposed Development.



5.0 Development Plan Position and Updated Material Considerations

Since the submission of the Application in April 2023 there has been progress on the updated draft Wiltshire Local Plan (WLP).

The Wiltshire Local Plan Pre-Submission Draft 2022-2038 (Regulation 19) 2023 was submitted to the Secretary of State for Housing Communities and Local Government for independent examination on 28th November 2024. Once adopted, this will replace the current out-of-date Development Plan policies which date back to 2006, 2015 and 2017.

These emerging policies, given their advanced stage of preparation and greater consistency with national planning policy, are material to the determination of the Application, noting there is potential for these policies to be amended through the examination process.

Furthermore, there has been a significant number of new and updated national energy and planning policy updates, all of which emphasise the urgent need for new renewable energy infrastructure, including biomethane generating facilities. These too are directly material to the determination of the Application, in particular:

- National Planning Policy Framework 2024;
- EN EN-1: Overarching National Policy Statement (NPS) for Energy; and
- The UK's Biomass Strategy 2023.

The sections below summarises the updated position in respect of local Development Plan policy and national energy and planning policy considerations.

5.1 Development Plan Position

The adopted Development Plan for the Proposed Development remains as set out in the 2023 PDAS (see bulleted documents below) and is not duplicated in detail here:

- Wiltshire Core Strategy (WCS) (Adopted 2015);
- Saved policies of North Wiltshire Local Plan 2011 (Adopted June 2006); and
- Ashton Keynes Neighbourhood Plan 2015 – 2026 (Made May 2017).

However, the emerging Wiltshire Local Plan (WLP) 2023 has advanced since the Application was submitted and is now under formal examination. It is considered that the draft WLP 2023 is a material consideration in the determination of the Application. The relationship between the adopted Development Plan policies to the emerging policies is summarised below.

5.1.1 Wiltshire Core Strategy 2015

The 2023 PDAS identifies that the following WCS 2015 policies are relevant to the determination of the Application:

- *Policy 34: Additional Employment Land* - this is proposed to be replaced by draft WLP 2023 Policy 64 Additional Employment Land which supports the rural way of life through



the promotion of modern agricultural practices or appropriate diversification of the rural economy;

- *Policy 42: Standalone renewable energy installations* – this is proposed to be replaced by draft WLP 2023 Policy 86 Renewable Energy which states that all types of renewable energy installations will be supported subject to locational criteria and cumulative impacts;
- *Policy 50: Biodiversity and Geodiversity* – this is proposed to be replaced by draft WLP 2023 Policy 88 Biodiversity and Geodiversity and by a new Policy 89 Biodiversity Net Gain;
- *Policy 51: Landscape* – this is proposed to be replaced by draft WLP 2023 Policy 91 Conserving and enhancing Wiltshire's Landscapes to reflect the emerging Landscape Strategy and Revised Landscape Character Assessments;
- *Policy 52: Green Infrastructure* – this is proposed to be replaced by draft WLP 2023 Policy 93 Green and Blue Infrastructure;
- *Policy 54: Cotswold Water Park* – this is proposed to be deleted and is now covered by draft WLP 2023 Policy 88 Biodiversity and Geodiversity;
- *Policy 55: Air Quality* – this is proposed to be replaced by draft WLP 2023 Policy 101 Air Quality updated to demonstrate that measures can be taken to mitigate emission levels to protect public health, environmental quality and amenity;
- *Policy 56: Contaminated Land* – this is proposed to be retained by draft WLP 2023 Policy 97 Contaminated Land;
- *Policy 57: Ensuring High Quality Design and Place Shaping* – this is proposed to be replaced by draft WLP 2023 Policy 98 Ensuring High Quality Design and Place Shaping updated to respond to all new provisions within the NPPF. The emerging Wiltshire Design Guide, a supplementary planning document, will also expand on the requirements of Core Policy 57 by including supplementary locally relevant background and instruction;
- *Policy 58: Ensuring the Conservation of the Historic Environment* – this is proposed to be replaced by draft WLP 2023 Policy 98 Ensuring High Quality Design and Place Shaping and Policy 99 Ensuring the Conservation and Enhancement of the Historic environment;
- *Policy 61: Transport and Development* – this is proposed to be replaced by draft WLP 2023 Policy 71 Transport and New Development updated to reflect the rural nature of the Wiltshire Council area, to update the movement hierarchy to reflect all the relevant transport modes including those outlined in the DfT's Future of Mobility document, and to outline the requirement for electric vehicle infrastructure in new developments;
- *Policy 62: Development Impacts on the Transport network* – this is proposed to be replaced by draft WLP 2023 Policy 72 Development Impacts on the Primary and Major Road Networks updated to refer to the major road network and to move the requirement for new development to provide appropriate mitigating measures to offset any adverse impacts on the transport network at both the construction and operational stages to the Transport and New Development policy; and
- *Policy 67: Flood Risk* – this is proposed to be replaced by draft WLP 2023 Policy 95 Flood Risk updated to clarify that a sequential approach to flood risk management, with the aim of locating development on land with the lowest risk of flooding, will be followed and that



the impact of a development proposal on all sources of flood risk will need to be considered; and

5.1.2 Saved Policies of North Wiltshire Local Plan 2006

The following policies of the Saved Policies of North Wiltshire Local Plan 2006 are relevant to the determination of the Application, and their relationship to the emerging policies in the draft WLP 2023 is summarised below:

- *Policy NE12 Woodland* – this is proposed to be replaced by draft WLP 2023 Policy 90 Woodlands, Hedgerows and Trees;
- *Policy NE14 Trees* – this is proposed to be deleted by the draft WLP 2023; and
- *Policy NE18 Noise and Pollution* – this is proposed to be deleted by the draft WLP 2023.

5.1.3 Ashton Keynes Neighbourhood Plan 2017

The policies of the Ashton Keynes Neighbourhood Development Plan Area will be reconsidered the draft WLP 2023 has completed its adoption process.

5.2 Emerging Wiltshire Local Plan 2023

In addition to the draft WLP 2023 policies noted above, *Policy 4 Addressing Climate Change* is a wholly new policy and is material to the determination of the Application.

The draft WLP states that the climate and ecological emergency represent one of the greatest challenges to address over the coming years. Delivering high quality design, accelerating the delivery of zero carbon buildings, maximising the benefits of green and blue infrastructure, maximising opportunities for active and sustainable modes of travel, increasing renewable energy generation and other sustainable interventions all have a role to play in helping to mitigate the impacts of high temperatures, reduce flood risk, and enhance biodiversity.

Policy 4 “is far reaching and seeks to address many of the themes that go to the heart of tackling climate change. It acts as an anchor for several other policies within the Plan and will be a key policy consideration in its own right in the decision-making process”.

In particular Policy 4 requires that carbon emissions are minimised by:

“being located to reduce the need to travel and optimise the opportunities to access services and make trips by sustainable active modes of transport (in accordance with Policies 70 and 71- Sustainable transport, and Transport and new development)”;....

“taking opportunities to generate, incorporate and connect to renewable and low carbon energy infrastructure wherever feasible (in accordance with Policy 86- Renewable energy)”;....

“adopting the principles of the circular economy to reduce consumption of finite resources, reduce waste and maximise recycling”.



5.3 National Planning and Energy Policy

5.3.1 National Planning Policy Framework (NPPF) (December 2024)

5.3.1.1 Achieving Sustainable Development

Paragraph 7 states that the purpose of the planning system is to contribute to the achievement of sustainable development, an objective summarises as meeting the needs of the present without compromising the ability of future generations to meet their own needs.

Paragraph 8 advises that for the planning system to achieve sustainable development it must deliver on three overarching and interdependent objectives:

- a) **an economic objective** – *to help build a strong, responsive and competitive economy*, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
- b) **a social objective** – *to support strong, vibrant and healthy communities*, including by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
- c) **an environmental objective** – *to protect and enhance our natural, built and historic environment*; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and *mitigating and adapting to climate change, including moving to a low carbon economy*.

Paragraph 10 of the NPPF states that “*So that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development.*”

Paragraph 11 of the NPPF goes on to state that where there are no relevant Development Plan policies, or the policies which are most important to determining the application are out of date, planning permission should be granted unless:

- The application of policies in the NPPF that protect areas or assets of particular importance provide a strong reason for refusing the development proposed; or
- Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the NPPF as a whole, having particular regard to key policies directing development to sustainable locations, making effective use of land and securing well-designed places.

5.3.1.2 Supporting a Prosperous Rural Economy

Paragraph 88 of the NPPF states that planning policies and decisions should enable the sustainable growth and expansion of all types of business in rural areas including through well-designed, new buildings. In addition, the development and diversification of agricultural and other land-based rural businesses is also supported.

Paragraph 89 importantly recognises that sites to meet local business and community needs in rural areas “*may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. In these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local*



roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport). The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist.”

5.3.1.3 Planning for Climate Change

Multiple references are made in the NPPF in support of renewable and low carbon energy generation infrastructure proposals as summarised below:

- The planning system should support the transition to net zero by 2050 (see paragraph 161) including by helping to:
 - o shape places in ways that contribute to radical reductions in greenhouse gas emissions;
 - o minimise vulnerability and improve resilience;
 - o encourage the reuse of existing resources; and
 - o support renewable and low carbon energy and associated infrastructure.
- Development Plans should help increase the use and supply of renewable and low carbon energy by providing a positive strategy for energy from these sources and identifying suitable areas for renewable and low carbon energy sources (paragraph 165).
- Paragraph 168 states that when determining planning applications for all forms of renewable and low carbon energy development, local planning authorities “*should not require applicants to demonstrate the overall need for renewable or low carbon energy and give significant weight to the benefits associated with renewable and low carbon energy generation and the proposal’s contribution to a net zero future*”.

5.3.1.4 Sustainable Transport

Paragraph 115 relates to assessing applications in respect of sustainable transport, safe and suitable site access and design. It also states that it should be ensured that any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.

Paragraph 116 states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

5.3.1.5 Achieving Well-Designed Places

Paragraph 131 states that good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. The NPPF sets out what is considered to embody good design, and is clear development which is not well designed should be refused.

5.3.1.6 Planning and Flood Risk

Paragraph 174 states that new development should be steered to areas with the lowest risk of flooding from any source. Paragraph 181 states that when determining any planning applications, local planning authorities should ensure flood risk is not increased elsewhere.



5.3.1.7 Conserving and Enhancing the Natural and Historic Environment

Paragraphs 187 to 221 emphasise the importance of preservation and enhancement of the built and natural environment. They set out detailed policy in respect of the assessment of the impact on landscape value, agricultural land, ground conditions, biodiversity and habitats, and the historic environment.

5.3.2 EN-1: Overarching National Policy Statement (NPS) for Energy

The recently updated NPSs were formally brought into effect by the Government on 17 January 2024.

Paragraph 1.2.1 states that NPS EN-1, in combination with any relevant technology specific NPSs, may be material considerations in decision making on applications that fall under the Town and Country Planning Act 1990. It is considered that NPS EN-1 is material to the determination of the Proposed Development.

NPS EN-1 summarises Government objectives for the energy system as:

“Our objectives for the energy system are to ensure our supply of energy always remains secure, reliable, affordable, and consistent with meeting our target to cut GHG emissions to net zero by 2050, including through delivery of our carbon budgets and Nationally Determined Contribution. This will require a step change in the decarbonisation of our energy system.” (paragraph 2.3.3)

It states that meeting these objectives necessitates a significant amount of new energy infrastructure, both large nationally significant developments and small-scale developments determined at a local level. The requirement for new energy infrastructure will present opportunities for the UK and contributes towards our ambition to support jobs in the UK's clean energy industry and local supply chains (paragraph 2.3.4).

Paragraph 2.3.5 states that the UK needs to dramatically increase the volume of energy supplied from low carbon sources.

NPS EN-1 recognises that biomethane is the only green gas commercially produced in the UK, and can be injected into the gas grid, following suitable upgrading processes, for use as a lower carbon substitute for natural gas. The Government's Green Gas Support Scheme (GGSS) is intended to help decarbonise gas supplies by increasing the proportion of green gas in the grid, through support for biomethane injection. NPS EN-1 also states that some models are being trialled to overcome the barriers presented by direct gas grid injection, through AD facilities in rural areas feeding their biomethane into a single injection point on the gas grid (paragraphs 3.4.23 – 3.4.25).

NPS EN-1 explains that Government has committed to fully decarbonising the power system by 2035, subject to security of supply, to underpin its 2050 net zero ambitions. More than half of final energy demand in 2050 could be met by electricity, as transport and heating in particular shift from fossil fuel to electrical technology (paragraph 4.2.1).

Ensuring the UK is more energy independent, resilient and secure requires the smooth transition to abundant, low-carbon energy (paragraph 4.2.2).

Government has therefore concluded that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure (paragraph 4.2.4). Low carbon infrastructure is defined to include anaerobic digestion and other plants that convert residual waste into energy for electricity generation (paragraph 4.2.5).



5.3.3 Biomass Strategy (August 2023)

The Biomass Strategy was published by the Department for Energy Security and Net Zero in August 2023 and sets out the role biomass can play in reaching net zero, what government is doing to enable that objective and where further action is needed.

The glossary of the Biomass Strategy defines 'biomass' as any material of biological origin (including wastes) which is used as a fuel for bioenergy (conventional combustion, gasification, energy from waste and low-carbon fuels like biofuels and hydrogen) or in products (such as chemicals, bioplastics and timber for construction).

The Executive Summary (page 8) states:

"Biomethane will continue to play an important role in optimising the path to net zero and increasing energy security; it can support decarbonising a number of sectors such as heat, transport and power, and the anaerobic digestion (AD) process is recognised as a recycling activity, creating a more circular economy."

Chapter 2 (page 19) states that sustainable biomass is a versatile low carbon resource that is needed to meet the UK's net zero target, helping to displace the use of fossil fuels in hard-to-decarbonise parts of the economy and by delivering negative emissions.

Chapter 4 (page 78) notes that in addition to generating renewable energy, AD is recognised as a form of recycling activity where it recycles nutrients, and the resulting digestate can be spread to land creating a more circular economy.

Chapter 7 (page 154) explains that biomethane is a renewable gas produced most commonly via AD, a process whereby organic materials are broken down by microbes in the absence of oxygen to produce biogas, which is in turn upgraded by removing CO₂ and other gases. This biomethane can be injected into our existing gas grid to directly displace fossil methane across a range of end uses. Biomethane also contributes to increasing energy security, by virtue of being produced domestically, sustainably, and delivering steady production volumes, provided feedstock supply is stable; plants can also be deployed relatively quickly, compared to other energy infrastructure.

The economic and diversification benefits of anaerobic digestion facilities are also clearly recognised in the strategy:

"Biomethane production also contributes towards the development of renewable energy supply chains. Our analysis suggests that over two thirds of existing biomethane plants are located in rural areas, with 80% of all GB plants located in areas with a lower-than-average Gross Value Added. Supporting the development of this industry therefore benefits the wider economy by creating jobs, developing net zero skills in the workforce, and helping to diversify and grow the rural economy" (page 156).

5.3.4 Planning Practice Guidance (NPPG) (March 2014 and updated thereafter)

The PPG provides guidance on planning practice and states that addressing climate change is one of the core land use planning principles which NPPF expects to underpin both plan-making and decision-taking (Reference ID: 6-001-20140306).

Increasing the amount of energy from renewable and low carbon technologies will help to make sure the UK has a secure energy supply, reduce greenhouse gas emissions to slow down climate change and stimulate investment in new jobs and businesses (Reference ID: 5-001-20140306).

It subsequently states that planning has an important role in the delivery of new renewable and low carbon energy infrastructure in locations where the local environmental impact is acceptable



5.4 Summary

The policies of WC's Development Plan are out of date. In such situations NPPF 2024 states that planning permission should be granted unless:

- the NPPF policies that protect areas or assets of importance provide a strong reason for refusing the development proposed; or
- where the adverse impacts of granting consent would significantly and demonstrably outweigh the benefits of the development proposed when assessed against the NPPF as a whole.

The NPPF gives significant weight to the benefits of renewable and low carbon energy generation proposals and supports the sustainable growth and expansion of all types of business in rural areas including through well-designed, new buildings and the diversification of agricultural businesses. It recognises that sites may have to be found adjacent to or beyond existing settlements and, in such circumstances, it is important to ensure the development is sensitive to its surroundings, is acceptable on local roads and uses previously developed land where suitable opportunities exist.

National energy policy is up to date and very clear, strongly supporting the delivery of both large- and small-scale new energy generation capacity which is renewable and low carbon. Government explicitly supports the generation of biomethane gas as part of its strategy to meet growing energy demand, recognising it has significant additional benefits in terms of recycling waste materials and helping to grow the rural economy.



6.0 The Planning Balance

The following key planning considerations are considered relevant to the Proposed Development and are assessed in this section:

- The Principle of Development;
- Key benefits of the Proposed Development;
- Farm Diversification;
- Design;
- Landscape and Visual Impact;
- Green Infrastructure;
- Transport and Access;
- Flood Risk and Drainage;
- Heritage;
- Biodiversity; and
- Impacts on Amenity.

It is considered that as the adopted Development Plan is significantly out of date, the Application should be approved (see paragraph 11 of the NPPF) unless:

- Policies within the NPPF protecting areas or assets of particular importance provide a strong reason for refusing it; or
- Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits of the Proposed Development when assessed against the NPPF as a whole.

However, for completeness, the Proposed Development is also assessed against the policies of both the adopted and emerging Development Plan.

6.1 The Principle of Development

The Government has declared a climate emergency in the last six years and has legislated a net zero emissions target by 2050.

6.1.1 National Planning Policy

The NPPF states the planning system should support the transition to net zero by 2050, including through supporting renewable and low carbon energy generating infrastructure as it seeks to move to a low carbon economy.

The Proposed Development has been evidenced to be a carbon negative scheme as set out in the Carbon Report 2025. This report calculates that the Proposed Development is expected to save -29,801 tonnes of CO₂ savings every year when considered using the latest criteria and on a “Cradle to Grave” basis. This is the equivalent of removing 15,600 cars from the road or planting 1.2 million trees.



The Proposed Development would therefore make a significant contribution to reducing harmful greenhouse gases and would deliver a positive step forwards to achieving a low carbon economy. It is considered that the Proposed Development is strongly supported in this respect by the NPPF. The NPPF requires that significant weight be given to the benefits associated with renewable and low carbon energy generation. The Proposed Development received significant support from the NPPF in this respect. Furthermore, developers are not required to justify the need for renewable and low carbon energy.

The Proposed Development is also an excellent example of the circular economy model that underpins the NPPF overarching sustainability objective. The Proposed Development recycles wastes, generates renewable energy, generates zero waste, provides a natural source of fertiliser to improve crop yields and soil health, offers CO₂ recovery which is an essential ingredient for the food, beverage, construction and medical sectors, generates 15 FTE jobs and 35 indirect and induced employment opportunities in the green energy sector, and supports the sustainable diversification of the farming rural economy at a time when local farms are increasingly struggling to remain viable.

6.1.2 National Energy Policy

Government energy policy as set out in NPS EN-1 and the Biomass Strategy 2023 explains that the UK needs to dramatically increase the volume of energy supplied from renewable and low carbon sources. Both recognise that biomethane gas is an important source of renewable and low carbon energy.

The Proposed Development would generate c. 9.8 million Nm³ of renewable and low carbon biomethane gas every year. The volume of renewable and low carbon gas produced is sufficient to meet the heating demands of 8,700 UK households every year, equivalent to all the homes in Cirencester. This is a significant contribution to the generation of renewable and low carbon energy, and as such is strongly supported by both the NPPF and Government energy policy due to its role in tackling the climate emergency and increasing energy security.

6.1.3 Local Planning Policy

Policy 42 of the WCS 2015 supports proposals for renewable energy schemes such as the Proposed Development, subject to the satisfactory resolution of all site specific constraints including:

- *The landscape, particularly in and around AONBs:* the Proposed Development is outside of and distant from the Cotswold National Landscape (former known as AONBs) and the North Wessex Downs National Landscape. The Site is not located in a protected landscape and is within an area shaped by ongoing mineral extraction and processing, utility infrastructure and industrial land uses all of which generate HGV traffic along Ashton Road adjacent to the Site. The ES and ES Addendum 2025 conclude that the design of the Proposed Development has been landscape led and incorporates a range of embedded design measures including low level earth mounding and mitigation woodland planting. The only significant residual effect identified, would be the landscape character of the Site itself, which is inevitable with any green field development by renewable energy generating infrastructure.
- *The Western Wiltshire Green Belt:* the Proposed Development is not within the Western Wiltshire Green Belt;



- *The New Forest National Park:* the Proposed Development is not within the New Forest National Park;
- *Biodiversity:* At the time of writing WC's Ecology Team has no objection to the Proposed Development subject to the imposition of planning conditions. It is anticipated this position will remain unaltered given that the ES and ES Addendum 2025 conclude that there would be no significant impacts on any statutory (including the Cotswold Lakes SSSI) or Local Wildlife Site. The Proposed Development would deliver a positive habitat biodiversity net gain of 20.33%, and also a positive change in hedgerow biodiversity net gain of 72.18%, both well beyond the statutory requirement for developers to deliver a 10% net gain.

The ES Addendum 2025, Chapter 4 Air Quality, notes that the boundary of the Cotswold Lakes SSSI had been extended to include more lakes and habitat; the nearest of which include areas within 300m of the Site. However, air quality impacts on conservation areas are predicted to be within relevant air quality assessment limits for each pollutant. The predicted impacts of nutrient nitrogen and acid deposition are considered unlikely to result in adverse effects.

In these respects, it is considered that the Proposed Development also complies with NPPF policies on biodiversity, Policy 50 of the WCS 2015 and draft Policies 88 and 89 of the draft WLP 2023.

- *The historic environment:* At the time of writing WC's Conservation and Archaeology Teams have no objection to the Proposed Development subject to the imposition of planning conditions. It is anticipated this position will remain unaltered given that the ES and ES Addendum 2025 conclude that there will be no significant effects on designated and non-designated heritage assets, and the Applicant's Archaeological Evaluation Report was approved in by WC's Archaeologist in July 2025.

In these respects, it is considered that the Proposed Development also complies with NPPF policies on heritage, Policy 58 of the WCS 2015 and draft Policies 98 and 99 of the draft WLP 2023.

- *Use of the local transport network:* At the time of writing WC as Highway Authority has no objection to the Proposed Development subject to the imposition of planning conditions. It is anticipated this position will remain unaltered given that the ES and ES Addendum 2025 conclude the Proposed Development is acceptable in terms of operational capacity, highway safety and environmental impacts. No changes are proposed to the Site access design or to the number or nature of vehicular movements.

In these respects, it is considered that the Proposed Development also complies with NPPF policies on transport, Policies 61 and 62 of the WCS 2015 and draft Policies 71 and 72 of the draft WLP 2023.

- *Residential amenity, including noise, odour, visual amenity and safety:* At the time of writing WC's Environmental Protection Team and the Environment Agency have no objection to the Proposed Development subject to the imposition of planning conditions. It is anticipated this position will remain unaltered given that the ES and ES Addendum 2025 conclude the Proposed Development has no significant noise, odour, visual amenity or safety impacts. In the event that planning permission is granted for the Proposed Development, it will also be separately strictly regulated by the Environment Agency and the Hazardous Substances Authority (WC) through an Environmental Permit and



Hazardous Substances Consent respectively, in addition to health and safety law. Planning decision makers must assume that these regulatory regimes will operate effectively.

In these respects, it is considered that the Proposed Development also complies with NPPF policies on amenity, Policy 55 of the WCS 2015 and draft Policy 101 of the draft WLP 2023.

- **Best and most versatile agricultural land:** The agricultural land classification of the Site is Grade 3 which is not best and most versatile land and covers a small area of arable fields (c. 7 has) which would be returned to agricultural use at the end of the Proposed Development's 25-year operational life. Through the production of the natural digestate fertiliser for use by local farms, the Proposed Development would support food production by improving land quality and resultant crop yields.

Emerging WLP Policy 86 reflects WCS Policy 42, adding that provision needs to be made in any planning permission for the decommissioning of the Proposed Development on cessation of energy generation with restoration of the Site back to its original use or alternative acceptable countryside use. Emerging Policy 4 Addressing Climate Change is also supportive of the principle of the Proposed Development given its renewable and low carbon energy generation credentials and its adoption of the circular economy principles.

It is considered that the principle of the Proposed Development is strongly supported by both national and local policy.

6.2 Key Benefits of the Proposed Development

The Proposed Development is an excellent example of the circular economy approach that is an underpinning pillar of sustainable planning; supporting the farming sector, strengthening the rural economy, tackling climate change, recycling waste, minimising transport impacts through its central location within the agricultural community it serves and delivering significant biodiversity net gain.

The many benefits arising from the Proposed Development are listed at Section 1.1.2 and are not repeated here, and it is considered that they weigh heavily in favour of the Proposed Development. It is considered that the limited adverse impact of the Proposed Development (restricted to the sole matter of landscape character) is significantly outweighed by the multiple benefits arising from the Proposed Development.

6.3 Farm Diversification

The NPPF is supportive of the diversification of agricultural land uses and recognises that such development proposals may have to be located outside of existing settlements. In such circumstances it is important that the proposals are sensitive to their surroundings and are acceptable from a highway perspective.

As explained in Section 5 above, the Proposed Development represents an important source of diversification to all local farmers and the declining dairy and cattle farm in particular. Farmers will receive valuable income from the Applicant for the supply of the agricultural feedstock necessary to create the biomethane gas, and the produced natural digestate fertiliser would be distributed back to local farmers to improve their field soil quality and boost crop yields. Farmers can then



use this digestate fertiliser to reduce farm costs by replacing imported (less sustainable) and expensive artificial fertilisers.

WCS Policy 34 Additional Employment Land also supports developments on land in rural areas where it would “*support sustainable farming and food production through allowing development required to adapt to modern agricultural practices and diversification*” and would be:

- *Sustainable*: the location and function of the Proposed Development are inherently sustainable, not least through their embodiment of the circular economy approach that eliminates waste, promotes reuse, recycling and greater resource efficiency. The Proposed Development is carbon negative and produces enough renewable energy to heat all the homes in Cirencester. The Site’s location within an agricultural area reduces traffic distances and movement numbers. The Site is in Flood Zone 1 and the design of the surface water drainage scheme would ensure that neither it nor the surrounding area are at higher risk of flooding as a result of the Proposed Development. In this latter respect it is considered that the Proposed Development complies with the NPPF policies on flood risk, Policy 67 of the WCS 2015 and emerging Policy 95 of the draft WLP 2023.
- *Appropriate in scale to their location and do not adversely affect nearby buildings or residential amenity*: The design of the Proposed Development (lowered ground levels, low level bunding, extensive woodland planting and lower, less bulky tanks and buildings) ensures it is well assimilated into the local landscape. This is conclusively demonstrated by photomontages provided in the ES and ES Addendum 2025. The buildings are designed to look similar to other commercial farm buildings and structures in the area, with barn style structures and pitches roofs. These are proposed to be coloured to help assimilate them into the wider rural character and landscape. The proposed planting reinforces the local countryside character of the tree lined fields in the surrounding area. As explained in Section 6.1.3 above, there are no adverse impacts on residential amenity as a result of odour, dust, noise or visual impacts and no traffic generated by the Proposed Development will need to travel through local villages to reach the Site. In all these respects it is considered that the Proposed Development is supported by NPPF policies on good design, Policy 57 of the WCS 2015 and emerging Policy 98 of the draft WLP 2023.

WC’s Environmental Protection Team and the Environment Agency have no objections to the Proposed Development.

- *Are supported by evidence of their benefit to local economic needs*: The Agricultural Economy Report appended to the Locational Justification Report 2025 prepared by Savills explains in detail the benefits flowing to the rural economy and farming from the Proposed Development. The Proposed Development will also 100 FTE jobs over the construction period and 15 FTE jobs during operation, with a further 35 indirect and induced employment opportunities in the green energy sector
- *Would not undermine the delivery of strategic employment allocations*: the sizeable site area required for the Proposed Development, together with its strong functional links to the agricultural community, means its location on a farm holding within a semi-rural area close to local farms has the effect of protecting highly valued strategic employment allocations which are better suited to high employment uses requiring strong sustainable transport links.



- *Are supported by adequate infrastructure:* the Proposed Development benefits from good access from Ashton Road which in turn has excellent connections onto the B4696 (Spine Road West) with links to the A419 and the wider strategic road network. The Highway Authority has no objection to the Proposed Development.

In summary, the Proposed Development is considered to be in accordance with the NPPF, WCS Policy 34 and the emerging draft WLP Policy 64 together with the other referenced policies above.

6.4 Other Policy and Material Considerations

Both the 2023 PDAS and this PDAS Addendum 2025 have considered in detail other key policies relating to design, landscape and visual impact, green infrastructure, transport and access and flood risk and drainage, heritage, biodiversity and amenity.

6.5 Summary

Overall, the Proposed Development would provide urgently needed low carbon and renewable energy and an extensive range of valuable 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.



7.0 Conclusions

This 2025 PDAS Addendum is submitted in relation to planning application ref: PL/2023/03359 which has been under consideration by Wiltshire Council since May 2023. Since that time the Applicant has responded to requests for further information and also improved the design of the Proposed Development to deliver significant landscape and visual betterments together with more odour protection measures and an increase in biodiversity net gain. There are no objections to the Application from statutory technical consultees, with the single exception of WC's Landscape Team.

It is envisaged that this submission will conclude the engagement process and provide the final information necessary to enable the Application to be determined.

Additional information has been provided in relation to the separate regulatory regimes that would monitor and control the Proposed Development in addition to any planning permission which may be granted. Planning decisions should assume that these separate regulatory regimes will operate effectively and not seek to duplicate them. In summary the Proposed Development will be strictly regulated through four distinct and enforcing regimes, all operating in parallel: planning, environmental permitting, hazardous substances consent and health and safety regulations. The Applicant has demonstrable experience in securing and complying with all such regulations.

Concerns have been raised that the Site is not located in a suitable area and further information has been provided which explains in detail why the Applicant selected the chosen location. The Site is located within a semi-rural area which already successfully accommodates medium to large scale infrastructure. The Proposed Development serves an agricultural community and so must be close to the local farms it is supporting. Furthermore, by being on a farm holding and within a farming area, the chosen Site reduces transportation distances and overall transport movements and supports the diversification and viability of local family farms which are under severe financial strain which threatens their continued existence. The Site is well served by the strategic highway network, and at no point between the access to the Proposed Development and the A419 dual carriage would its associated HGV or tanker traffic pass through villages. Finally, the Site is not located within a protected landscape, ecological or heritage asset, and its impact on the nearby Cotswold Lakes SSSI, the Local Nature Reserve (Coke's Pit), the closest residential properties and other sensitive receptors has been rigorously assessed and found to be acceptable.

Since the submission of the Application in 2023, significant national planning and energy policy support has been published supporting renewable and low carbon energy generation projects. The NPPF 2024 gives significant weight to projects such as the Proposed Development and supports the sustainable growth and expansion of all types of business in rural areas including through well-designed, new buildings and the diversification of agricultural businesses. It recognises that sites may have to be found adjacent to or beyond existing settlements and, in such circumstances, it is important to ensure the development is sensitive to its surroundings and is acceptable on local roads. The Application is successful in these respects. Government also explicitly supports the generation of biomethane gas as part of its strategy to meet growing energy demand, recognising it has significant additional benefits in terms of recycling waste materials and helping to grow the rural economy.

Overall, the Proposed Development would provide urgently needed low carbon and renewable energy and an extensive range of valuable 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.

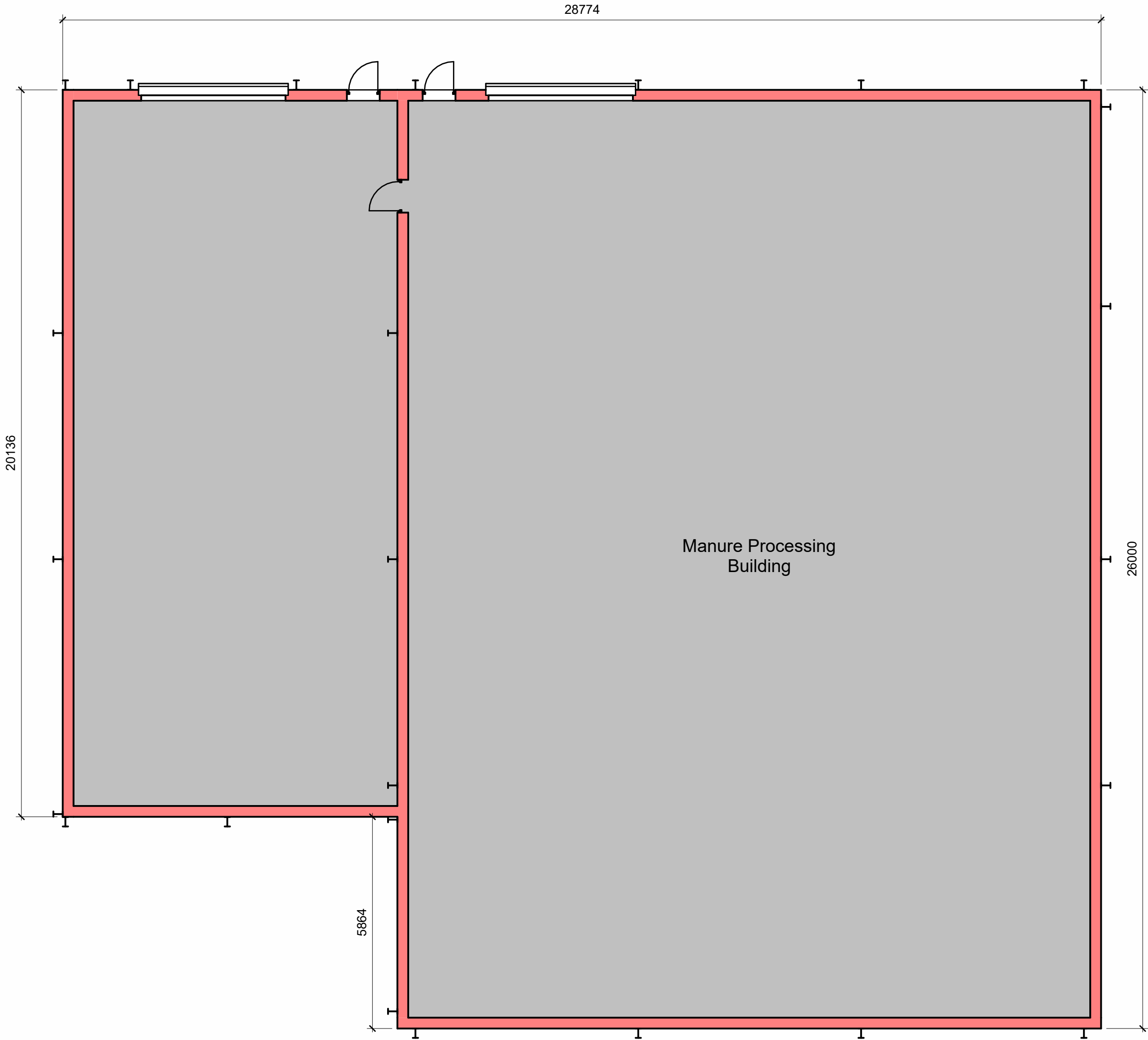
It is considered that the many benefits arising from the Proposed Development (see Section 1.1.2) lend it significant support which considerably outweighs its single identified adverse impact relating to landscape character. The planning policy analysis concludes that the development could proceed in accordance with the NPPF, the development plan policies for the area and the other relevant material considerations.

Overall, the Proposed Development would meet the urgent need for low carbon and renewable energy to meet Government net zero targets, provides wider benefits to the local rural community and economy (including jobs), is sensitively designed and has no unacceptable environmental, transport or amenity impacts. Therefore, the planning application should be approved without delay.



Appendix 1 – 2025 Design Refinement Planning Application Drawings





Ground Floor Plan
1 : 100



Roof Plan
1 : 100

ISSUED FOR PLANNING ONLY

Legend / Notes

0m2m4m6m8m10m

VISUAL SCALE 1:100 @ A1

D	21/05/25	Submitted for Planning	ASB	JC
C	19/05/25	Submitted for Planning	ASB	JC
B	01/05/25	Submitted for Planning	ASB	JC
A	08/08/24	Submitted for Planning	ASB	JC
Rev	Date	Description	DR	CH

StatusSubmitted for PlanningSuitability

Contractor(s)

Project

ASHTON KEYNES AD Plant

Drawing Title

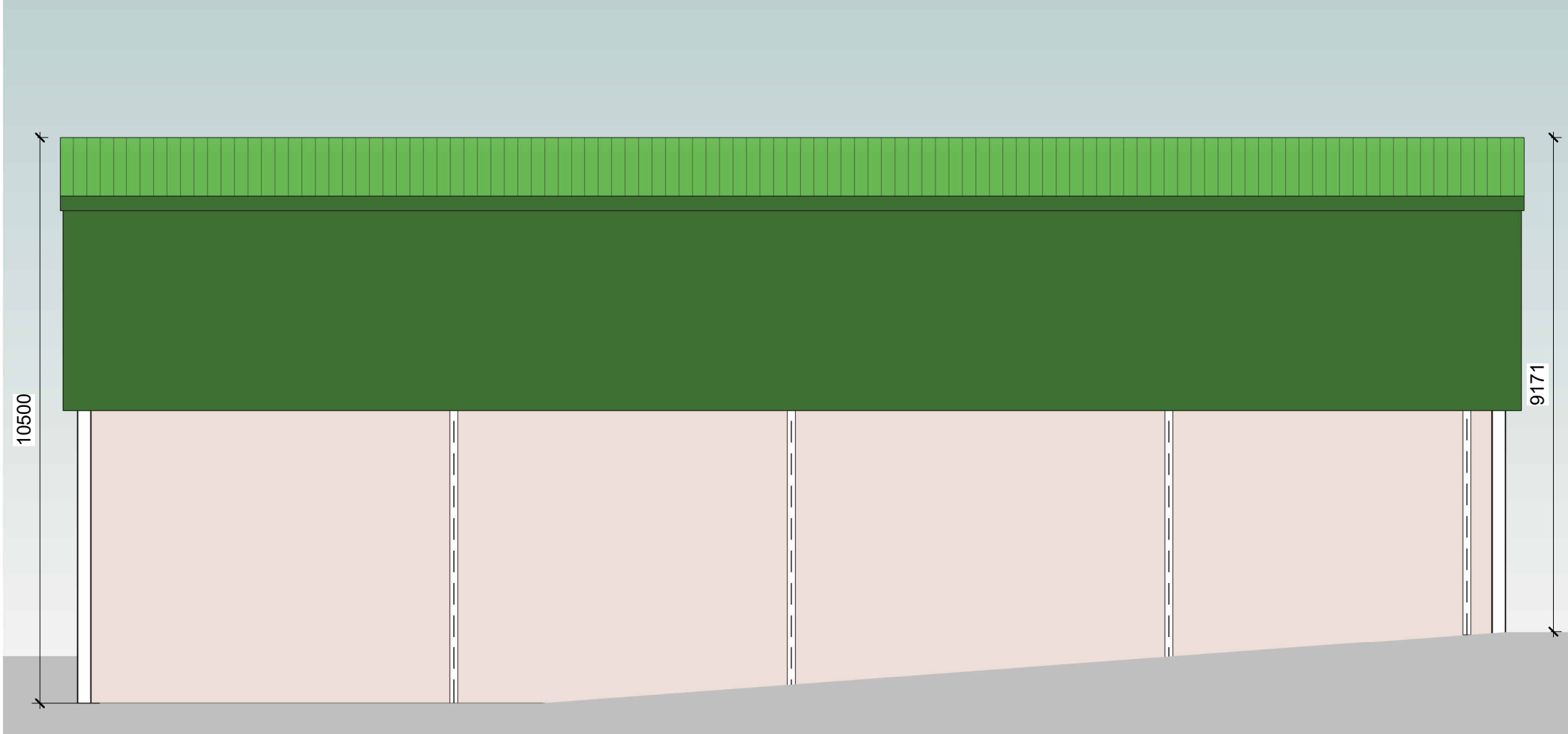
Manure Processing Building - Plans as Proposed

Designed	J. Collins	Signed	Date	21/05/25
Drawn	A. Bruce	Signed	Date	21/05/25
Checked	L. Beaton	Signed	Date	21/05/25
Approved	J. Collins	Signed	Date	21/05/25
Scale(s)	1 : 100 @A1		ELR & Mileage	
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Drawing Number			Revision	
29419			F104 D	

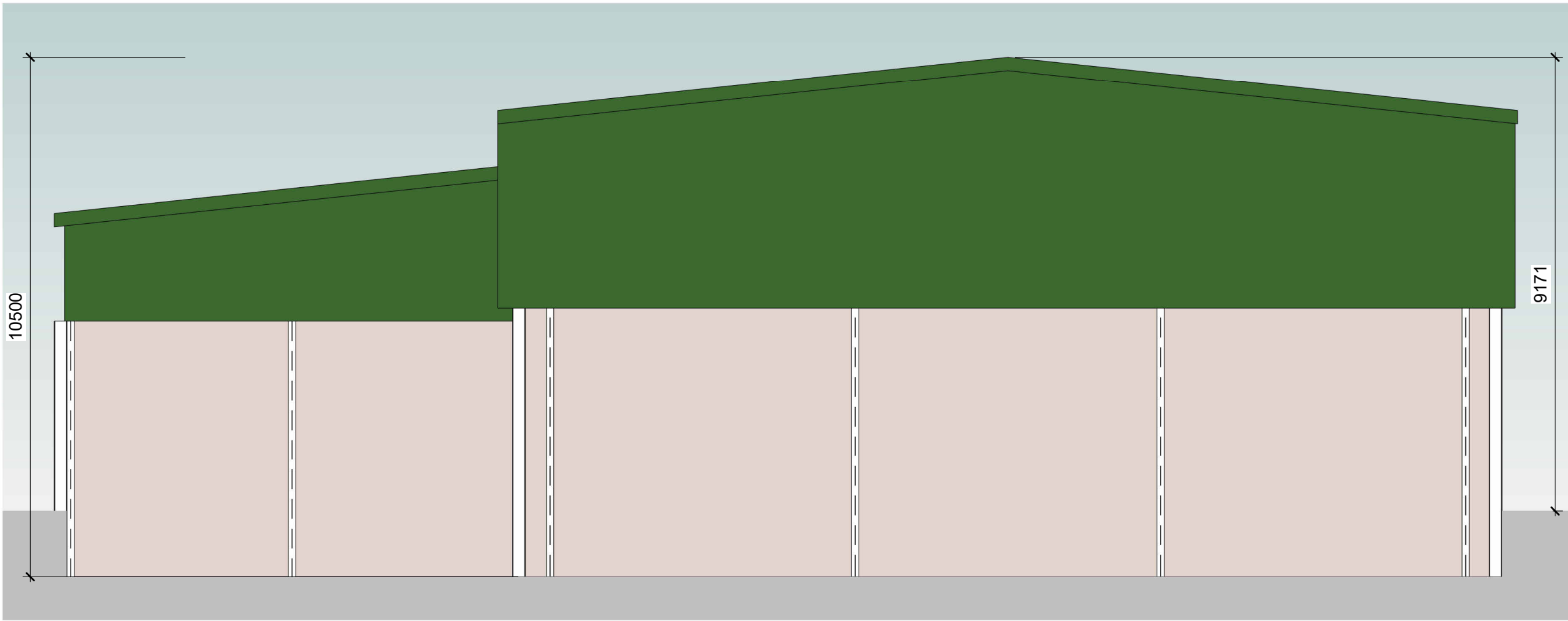
Sheet Size A1 594 x 841



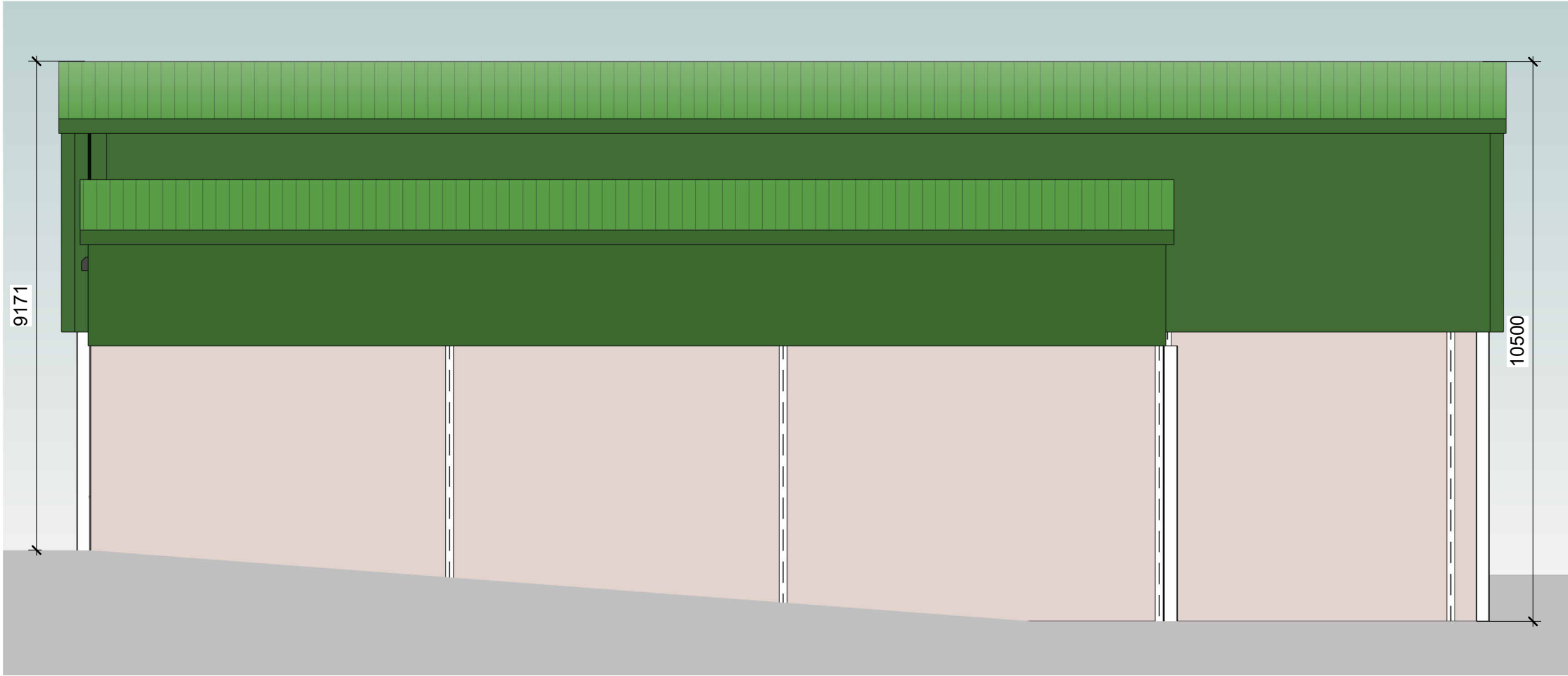
Front Elevation
1 : 100



Side Elevation
1 : 100



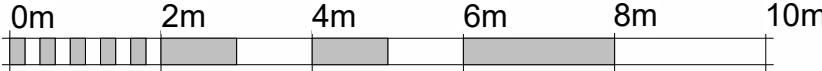
Rear Elevation
1 : 100



Side Elevation
1 : 100

ISSUED FOR PLANNING ONLY

Legend / Notes



VISUAL SCALE 1:100 @ A1

C	19/05/25	Submitted for Planning	ASB	JC
B	01/05/25	Submitted for Planning	ASB	JC
A	08/08/24	Submitted for Planning	ASB	JC
Rev	Date	Description	DR	CH

Status	Suitability
Submitted for Planning	



Contractor(s)



Project

ASHTON KEYNES AD Plant

Drawing Title

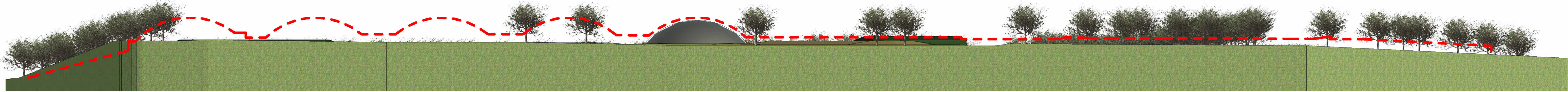
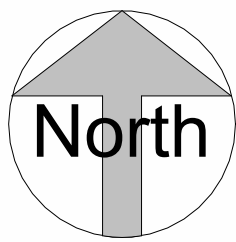
Manure Processing Building Sections
and Elevations as Proposed

Designed	J. Collins	Signed	Date	19/05/25
Drawn	A. Bruce	Signed	Date	19/05/25
Checked	L. Beaton	Signed	Date	19/05/25
Approved	J. Collins	Signed	Date	19/05/25

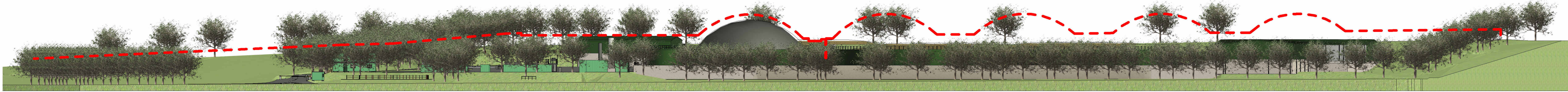
Scale(s)	ELR & Mileage
1 : 100 @A1	

Alternative Reference	Sheet
	of

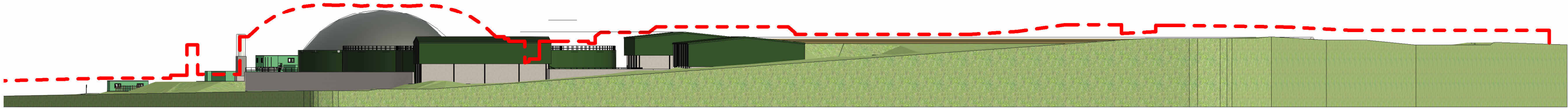
Drawing Number	F105	Revision	C
29419			



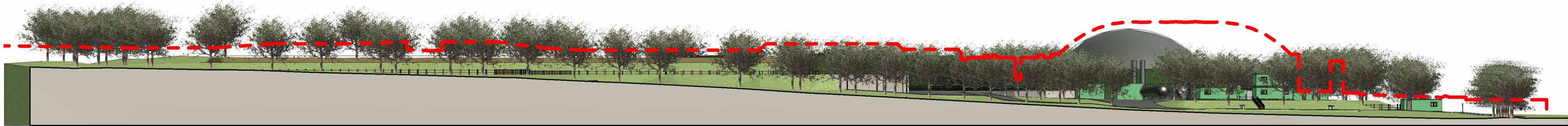
Elevation A
1 : 700



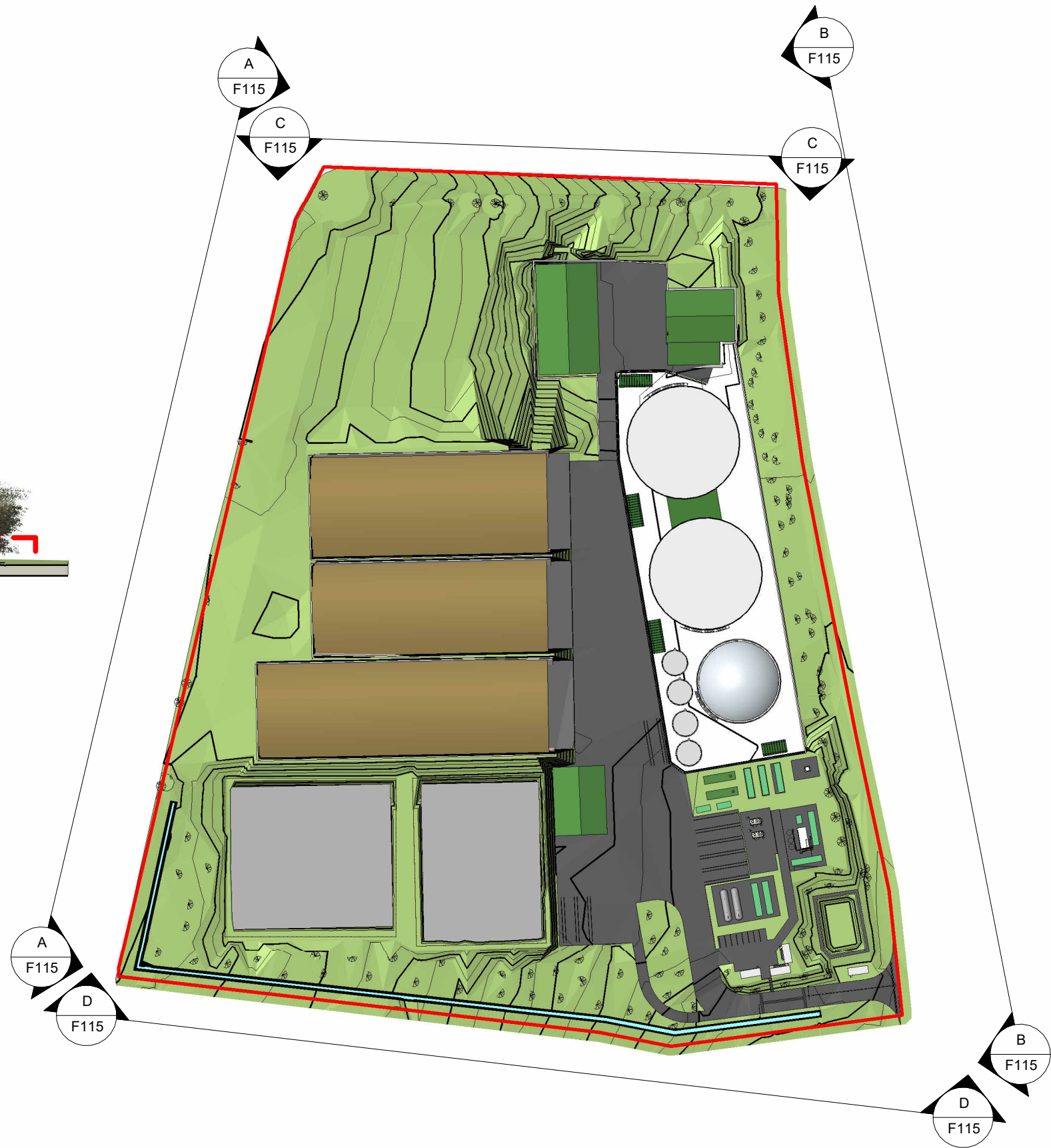
Elevation B
1 : 700



Elevation C
1 : 700



Elevation D
1 : 700



Elevation Key
1 : 2000

This drawing is to be used only for the purpose of the issue it was intended for.
For information relating to end use, maintenance, demolition, see Health & Safety files.
It is assumed that works will be undertaken by a competent Contractor to an approved method statement.
Legend / Notes

RED LINE INDICATES
PREVIOUS PLANNING
SCHEME DESIGN ON
ELEVATION.

0m 14m 28m 42m 56m 70m

VISUAL SCALE 1:700 @ A1

0m 40m 80m 120m 160m 200m

VISUAL SCALE 1:2000 @ A1

B	01/05/25	Issued for Planning	ASB	JC
A	25/02/25	Issued for Planning	ASB	JC
Rev	Date	Description	DR	CH
Status			Suitability	
Issued for Planning				



Contractor(s)



Project

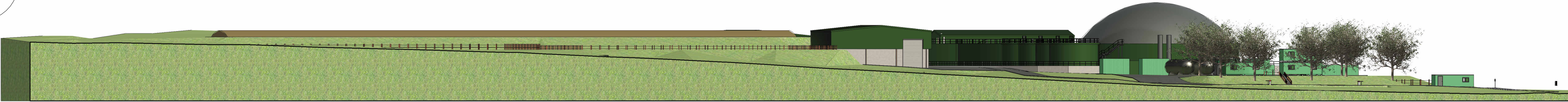
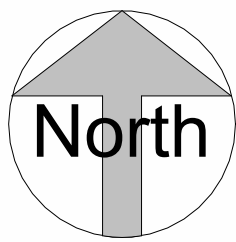
ASHTON KEYNES AD Plant

Drawing Title

Elevation Views - Previous and New
Planning Scheme

Designed	J. Collins	Signed	Date	01/05/25
Drawn	A. Bruce	Signed	Date	01/05/25
Checked	L. Beaton	Signed	Date	01/05/25
Approved	J. Collins	Signed	Date	01/05/25
Scale(s)	As indicated @A1		ELR & Mileage	
Alternative Reference				
Drawing Number			Sheet	of
29419			F115	Revision B

ISSUED FOR PLANNING ONLY



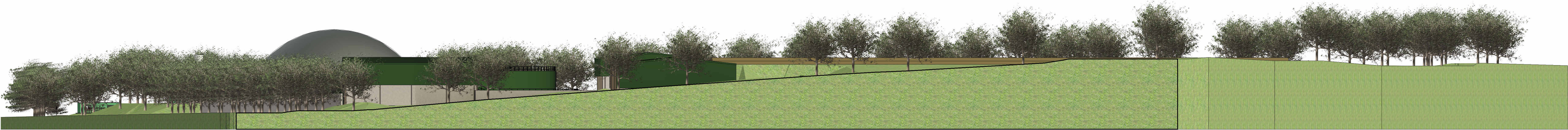
Elevation A - A
1 : 500



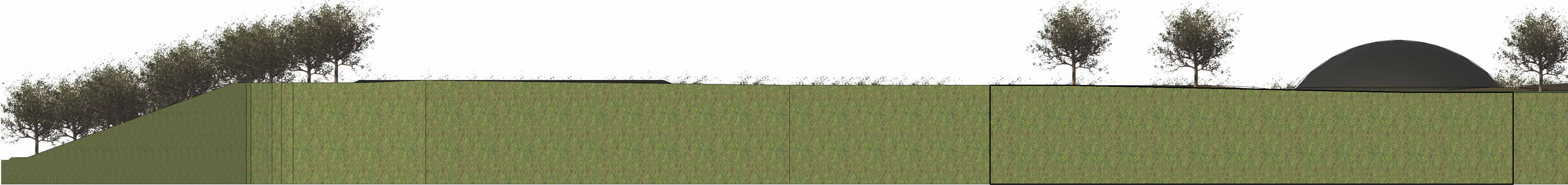
Elevation B - B - Part 1
1 : 500



Elevation B - B - Part 2
1 : 500



Elevation C - C
1 : 500

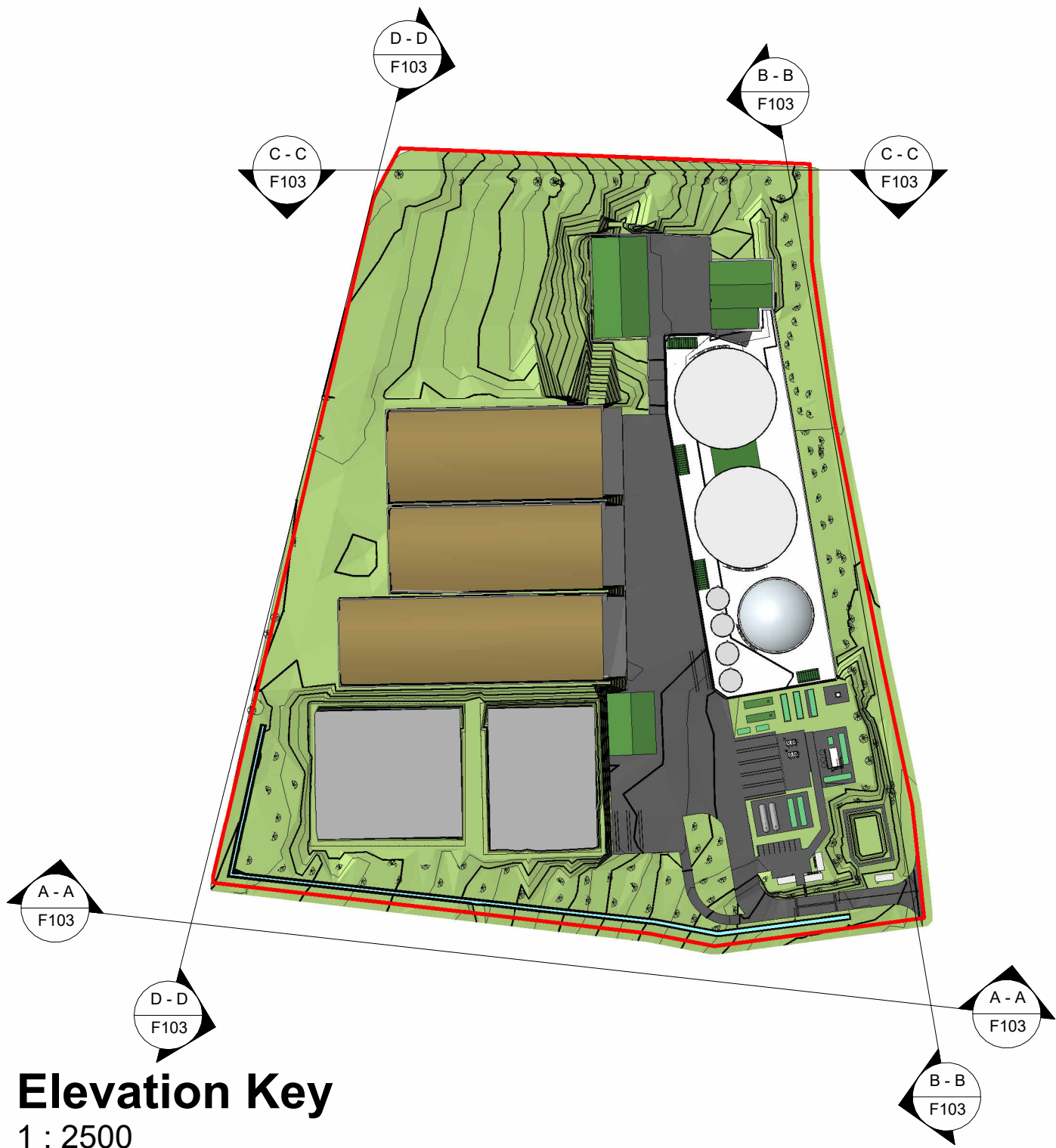


Elevation D - D - Part 1
1 : 500



Elevation D - D - Part 2
1 : 500

ISSUED FOR PLANNING ONLY



Elevation Key
1 : 2500

This drawing is to be used only for the purpose of the issue it was intended for.

For information relating to end use, maintenance, demolition, see Health & Safety files.

It is assumed that works will be undertaken by a competent Contractor to an approved method statement.

Legend / Notes

0m50m100m150m200m250m

VISUAL SCALE 1:2500 @ A1

0m10m20m30m40m50m

VISUAL SCALE 1:500 @ A1

C	01/05/25	Issued for Planning	ASB	JC
B	12/08/24	Issued for Planning	ASB	JC
A	07/08/24	Issued for Planning	ASB	JC
Rev	Date	Description	DR	CH
Status			Suitability	
Issued for Planning				

Contractor(s)

Project

ASHTON KEYNES AD Plant

Drawing Title

Site Elevations as Proposed

Designed	J. Collins	Signed	Date	01/05/25
Drawn	A. Bruce	Signed	Date	01/05/25
Checked	L. Beaton	Signed	Date	01/05/25
Approved	J. Collins	Signed	Date	01/05/25
Scale(s)	As indicated @A1		ELR & Mileage	
Alternative Reference			Sheet	of
Drawing Number			Revision	
29419			F103	C

Sheet Size A1 594 x 841



SITE PLAN
Scale: 1:750 @ A1

- NOTES:
1. All dimensions must be checked on site and not scaled from this drawing.
 2. The Contractor shall make a survey of the site and shall be responsible for obtaining all dimensions and levels necessary for the proper fabrication of the structure as indicated.
 3. All levels shown on this drawing are relative to Agreed Topographic survey
 4. This drawing is to be read in conjunction with 29419/100 Series Drawings.
 5. All existing invert levels are to be confirmed by contractor prior to construction. Connection subject to approval.

Site Red Line Boundary

T.O.C. : Denotes Top Of Concrete
T.O.W. : Denotes Top Of Wall
F.F.L. : Denotes Finished Level
S.S.L. : Denotes Structural Slab Level
T.O.B. : Denotes Top Of Bank
B.O.B. : Denotes Bottom Of Bank

+XX.XXX Denotes top of kerb level
+XX.XXX Denotes finished ground level
+XX.XXX Denotes top of concrete levels

P02	20/05/25	Issued For Approval	JHC	JHC
P01	07/08/23	Issued For Approval	JHC	JHC

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GGP CONSULT

CONSULTING ENGINEERS
ARCHITECTS
PROJECT MANAGEMENT

2 Hallam Road
Priory Park East
HULL HU4 7DY
United Kingdom

Telephone (+44) 01482 627963
Fax (+44) 01482 641736
Email info@ggpconsult.co.uk



AD Plant.
Ashton Keynes

Drawing Title
Proposed Levels

Status	Planning		
Scale	As Noted @ A1	Date	Jan '23
Drawn By	L. Beaton	Checked	JHC
Approved	JHC		
Dwg. No.	29419/P2/102	Rev	P02

NOT FOR CONSTRUCTION



INDICATIVE PLANTING SHEDULE

NATIVE HEDGE MIX – to be planted in double staggered rows @ 400mm centres (5/lin m) planted in single species groups no less than 3, no more than 5

Species	%	Form	Height (cm)	Root
Acer campestre	5	Transplant	60–80	BR
Corylus avellana	10	Transplant	60–80	BR
Crataegus monogyna	60	Transplant	60–80	BR
Prunus spinosa	20	Transplant	60–80	BR
Rosa canina	5	Transplant	60–80	BR

WOODLAND PLANTING MIX

Species	%	Girth (cm)	Height (cm)	Form	Root	Density
TREES						
Acer campestre	5	6–8	250–300	Feathered	RB	Ctr. 3–4m
Carpinus betulus	10	8–10	250–300	Standard	RB	Ctr. 3–4m
Fagus sylvatica	5	8–10	250–300	Standard	RB	Ctr. 3–4m
Malus sylvatica	10	6–8	200–250	Feathered	RB	Ctr. 3–4m
Prunus avium	10	6–8	250–300	Feathered	RB	Ctr. 3–4m
Quercus robur	10	6–8	250–300	Light Standard	RB	Ctr. 3–4m
UNDERSTORY SHRUB						
Cornus sanguinea	10	–	60–80	Transplant	RB	1/m2
Corylus avellana	10	–	80–100	Transplant	RB	1/m2
Crataegus monogyna	10	–	80–100	Transplant	RB	1/m2
Prunus spinosa	10	–	60–80	Transplant	RB	1/m2
Ilex aquifolium	5	–	30–40	Branched	RB	1/m2
Sambucus nigra	5	–	80–100	Transplant	RB	1/m2

Shrub to be planted in single species groups no less than 5, no more than 10

KEY

Site Boundary (7.06ha)

Existing vegetation

Tree/hedge to be removed

Proposed hedge planting to infill gaps within planting along road B4031

WOODLAND PLANTING

Proposed tree

Woodland edge and understorey (shrub only)

GRASSLAND AREA

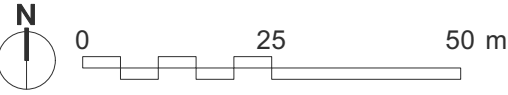
Wildflower grassland e.g. EM6 Meadow Mixture for Chalk and Limestone Soil by Emorsgate or similar approved

Wetland Meadow e.g. EM8 Meadow Mixture for Wetlands by Emorsgate or similar approved

Wildflower Meadow e.g. EM1 Basic General Purpose Meadow by Emorsgate or similar approved

Boundary fencing Post and wire

Perimeter secure site fencing



ASHTON KEYNES - Landscape Strategy Plan



Appendix 2 – Updated List of Planning Application Drawings for Application Ref: PL/2023/03359



Drawing Number	Rev	Drawing Title	Prepared By	Status	Changed in 2025
AKE-0002	-	Site Location	SLR	For Approval <i>Uploaded to LPA website 26 April 2023</i>	No
29419/F101	A	Site Layout for Planning	GGP	For Approval <i>Uploaded to Portal on 08th November 2024</i>	No
29419/P2/101	P03	Site Layout Plan Sheet 1 of 2	GGP	For Approval <i>Uploaded to Portal on 08th November 2024</i>	No
29419/P2/101	P03	Site Layout Plan Sheet 2 of 2	GGP	For Approval <i>Uploaded to Portal on 08th November 2024</i>	No
29419/F106	A	33m Dia. Dome Fermentor Tank – Plans, Section and Elevations as Proposed	GGP	For Approval <i>Uploaded to Portal on 08th November 2024</i>	No
29419/F107	A	45m Dia. Fermentor Tank, 9m High – Plans, Section and Elevations as Proposed	GGP	For Approval <i>Uploaded to Portal on 08th November 2024</i>	No
29419/P2/104	P01	Attenuation Tank Sections	GGP	For Approval <i>Uploaded to Portal on 08th November 2024</i>	No
29419/F110	A	Separator Building – Plans as Proposed	GGP	For Approval <i>Uploaded to Portal on 08th November 2024</i>	No
29419/F111	A	Separator Building – Sections and Elevations as Proposed	GGP	For Approval <i>Uploaded to Portal on 08th November 2024</i>	No
29419/F104	D	Manure Processing Building – Plans as Proposed	GGP	For Approval	Yes
29419/F105	C	Manure Processing Building - Sections and Elevations as Proposed	GGP	For Approval	Yes
29419/F108	A	Straw Bunker Building – Plans as Proposed	GGP	For Approval <i>Uploaded to Portal on 08th November 2024</i>	No
29419/F109	A	Straw Bunker Building – Elevations as Proposed	GGP	For Approval <i>Uploaded to Portal on 08th November 2024</i>	No
29419/P/2022	A	Silage Clamp Sections and Details	GGP	For Approval <i>Uploaded to Portal on 12 June 2023</i>	No
29419/P2/106	P01	Drainage Details Sheet 1 Clean Water Details	GGP	For Approval <i>Uploaded to Portal on 08th November 2024</i>	No
29419/P2/107	P01	Drainage Details Sheet 2	GGP	For Approval	No



Drawing Number	Rev	Drawing Title	Prepared By	Status	Changed in 2025
				<i>Uploaded to Portal on 08th November 2024</i>	
29419/P2/108	P01	Drainage Details Sheet 3	GGP	For Approval <i>Uploaded to Portal on 08th November 2024</i>	No
29419/P2/105	P01	Site Drainage Catchment Plan 1 of 2	GGP	For Approval <i>Uploaded to Portal 08th November 2024</i>	No
29419/P2/105	P02	Site Drainage Catchment Plan 2 of 2	GGP	For Approval <i>Uploaded to Portal on 08th November 2024</i>	No
29419/P/2016	A	Fencing and Gate Details	GGP	For Approval <i>Uploaded to Portal on 26th April 2023</i>	No
P24-1022_EN010	B	Landscape Strategy Plan	Pegasus	For Approval Submitted to LPA August 2025	Yes
29419/P2/101	P01	Hard/Soft Landscape Plan Sheet 1 of 2	GGP	For Approval <i>Uploaded to Portal on 08th November 2024</i>	No
29419/P2/101	P02	Hard/Soft Landscape Plan Sheet 2 of 2	GGP	For Approval <i>Uploaded to Portal on 08th November 2024</i>	No
29419/F112	A	Liquid Storage Tanks – Plans, Section and Elevations as Proposed	GGP	For Approval <i>Uploaded to Portal 08th November 2024</i>	No
29419/P/120	A	Paving Plan	GGP	For Approval <i>Uploaded to Portal on 26th April 2023</i>	No
29419/F102	B	Site Sections as Proposed	GGP	For Approval <i>Uploaded to Portal on 08th November 2024</i>	Yes
29419/F103	C	Site Elevations as Proposed	GGP	For Approval Issued to LPA August 2025	Yes
29419/P2/102	P02	Proposed Levels	GGP	For Approval Issued to LPA August 2025	Yes
29419/150-1	P01	Site Enclosure Plan Sheet 1 of 2	GGP	For Approval <i>Uploaded to Portal on 08th November 2024</i>	No
29419/150-2	P01	Site Enclosure Plan 2 of 2	GGP	For Approval <i>Uploaded to Portal on 08th November 2024</i>	No
29419/P/116	B	Welfare Office External Layout	GGP	For Approval	No



Drawing Number	Rev	Drawing Title	Prepared By	Status	Changed in 2025
				<i>Uploaded to Portal on 09th May 2023</i>	
29419/P/115	B	Welfare Office Internal Layout	GGP	For Approval <i>Uploaded to Portal on 09th May 2023</i>	No
29419/P2/109	P01	Proposed Section Through Wetland and Weir	GGP	For Approval <i>Uploaded to Portal on 08th November 2024</i>	No
29419/F115	B	Elevation View Comparison between Original 2023 Design and Proposed 2025 Design	GGP	For Information	New Plan 2025

