



Environmental 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

17 October 2025

Revision: 03

Revision Record

Revision	Date	Prepared By	Checked By	Authorised By
01	8 October 2025	AP	JF	
02	10 October 2025	JF	RN	
03	17 October 2025	JF	RN	RN

Basis of Report

This document has been prepared by SLR Consulting Limited (SLR) with reasonable skill, care and diligence, and taking account of the timescales and resources devoted to it by agreement with Acorn Bioenergy Limited (the Client) as part or all of the services it has been appointed by the Client to carry out. It is subject to the terms and conditions of that appointment.

SLR shall not be liable for the use of or reliance on any information, advice, recommendations and opinions in this document for any purpose by any person other than the Client. Reliance may be granted to a third party only in the event that SLR and the third party have executed a reliance agreement or collateral warranty.

Information reported herein may be based on the interpretation of public domain data collected by SLR, and/or information supplied by the Client and/or its other advisors and associates. These data have been accepted in good faith as being accurate and valid.

The copyright and intellectual property in all drawings, reports, specifications, bills of quantities, calculations and other information set out in this report remain vested in SLR unless the terms of appointment state otherwise.

This document may contain information of a specialised and/or highly technical nature and the Client is advised to seek clarification on any elements which may be unclear to it.

Information, advice, recommendations and opinions in this document should only be relied upon in the context of the whole document and any documents referenced explicitly herein and should then only be used within the context of the appointment.



Table of Contents

Basis of Report	i
1.0 Introduction	1
1.1 Purpose of the ES Addendum and Scope	1
1.2 Application History.....	1
1.3 Proposed Amendments	2
1.3.1 2024 Design Changes	2
1.3.2 2025 Design Refinements	2
1.4 Statement of Competency	2
2.0 Summary of Changes.....	4
3.0 Conclusion.....	1

Tables in Text

Table 1: ES Addendum Table	5
----------------------------------	---

Appendices

Appendix A	Updates to ES Chapter 2: Site and Surroundings and Chapter 3: Project Description
Appendix B	Applicant's letter to WC dated 24th October 2024
Appendix C	Additional LVIA Material and Updated Landscape Strategy Plan
Appendix D	Noise Impact Assessment Update
Appendix E	BMD Ecological Assessment and BNG Report
Appendix F	Earthcare Technical Air Quality Impact Assessment Addendum
(AQIAA)	
Appendix G	Updated Flood Risk Assessment
Appendix H	Updated Lighting Assessment



1.0 Introduction

SLR Consulting Limited (SLR) has been instructed by Acorn Bioenergy Limited (the Applicant) to produce an Environmental Statement (ES) Addendum as part of the Environmental Impact Assessment (EIA) process. The ES Addendum considers three minor design amendments (known as the 2025 Design Refinements) in combination with the design revisions previously submitted in October 2024 (known as the 2024 Design Changes) to the proposed anaerobic digestion (AD) facility (the Proposed Development) at Land West of Ashton Road, Ashton Keynes, Wiltshire SN6 6QT (the Site).

The 2025 Design Refinements and the 2024 Design Changes are described in Section 1.3. They have been made in direct response to representations made during the processing of the Application and deliver a significant betterment to landscape and visual impacts, potential odour emission mitigation and habitat biodiversity net gain.

The full results of the EIA review are reported in this ES Addendum, which should be read alongside the original Environmental Statement (ES), prepared by SLR and submitted to Wiltshire Council (WC) in April 2023 (Application Ref. PL/2023/03359).

1.1 Purpose of the ES Addendum and Scope

The aim of this ES Addendum is to provide clarity to WC on the potential changes that could occur to the technical assessments reported to-date and the EIA, as a result of the 2024 Design Changes and 2025 Design Refinements.

Each of the original 2023 ES chapters and supporting technical reports have been reviewed against the 2024 Design Changes and the 2025 Design Refinements, to identify whether they would make a material change to the 2023 assessment findings and conclusions.

This document should be read together with all previously submitted Application documentation, as well as this current submission, including the 2025 Planning, Design and Access Statement (PDAS) Addendum which explains the rationale for the proposed amendments and assesses them against key planning considerations.

1.2 Application History

All submissions relating to this Application can be viewed online via the WC website using reference: PL/2023/03359. The Application timeline is set out below:

- Submitted on 3 April 2023 and validated on 9 May 2023;
- 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 2024 Design Changes were submitted in October of that year, accompanied by a number of updated technical reports;
- 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;
- 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.



1.3 Proposed Amendments

1.3.1 2024 Design Changes

In response to representations made during formal consultation, the Applicant amended the design of the Proposed Development in October 2024 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 selected technology provider 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 comprised a comprehensive set of updated planning application drawings (c.27 in total). 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.

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

1.3.2 2025 Design Refinements

The 2025 Design Refinements now proposed follow from discussions with WC's planning and landscape officers in March 2025, which agreed the following three additional design improvements to deliver further betterments:

- A reduction in the height of the Chicken Manure Processing Building 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);
- Enhancements to the landscape proposals, which will provide effective screening from early years of operation. This includes 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.

1.4 Statement of Competency

The ES Addendum has been prepared in accordance with the requirements of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) and takes account of best practice guidelines from the Institute of Environmental Management and Assessment (IEMA). The EIA procedure requires an assessment of the likely significant environmental effects of a particular development, with the aim of ensuring that predicted effects are identified. Once identified, the scope for minimising those effects can be considered and properly understood by the decision maker.

SLR Consulting Ltd is a member of the Institute of Environmental Assessment and Management (IEMA). In accordance with Regulation 18(5) of the EIA Regulations, the ES must be accompanied by a statement outlining the relevant expertise and qualifications of the experts who have been involved in its preparation.

The revised chapters submitted within this ES Addendum have been prepared by:



- **Noise** – the updated Noise Impact Assessment has been undertaken by Michelle Dawson. Michelle, a Technical Director at SLR Consulting (Europe) and has over 15 years' experience within environmental consultancy. She has a broad range of consultancy expertise with a principal focus on the consenting and environmental assessment of commercial, industrial and infrastructure projects. She has project managed, delivered, and been involved in the assessment of large infrastructure projects across a range of sectors including transmission lines and substations, onshore and offshore wind farms, and Energy from Waste Facilities. Michelle is a Corporate Member of the Institute of Acoustics and her responsibilities include project managing environmental Noise and Vibration Assessments for residential, industrial, and infrastructure developments, representing Clients at Planning Committee, Appeal, and Public Inquiry, and mentoring junior members of staff.
- **Hydrology** – the updated Flood Risk Assessment has been undertaken by **Andrew Dannatt (CEng BEng (Hons), MICE MCIWEM C.WEM)**. Andrew has over 30 years' experience in the water sector as a civil engineering consultant. Andrew has been responsible for undertaking or managing numerous drainage strategies, Flood Risk Assessments and Environmental Impact Assessments in all flood zones in support of developments of all types. Andrew has also provided Statements of Evidence to court as an Expert Witness. His experience has included working overseas in demanding environments such as sub-Saharan Africa, Bangladesh, Nepal, Vietnam, Saudi Arabia, Mozambique and West Papua advising on flood risk management.
- **Ecology** – The updated Ecological Assessment and BNG report has been undertaken by **BMD**, an independent ecology, urban design and landscape architecture consultancy.
- **Air Quality** – The Updated Air Quality Technical Risk Assessment Addendum has been prepared by **Maria Fuhrmann** of Earthcare Limited. Maria has over 20 years' experience in environmental consultancy specialising in Air Quality. She delivers atmospheric dispersion modelling, impact assessment and emissions management for a range of sectors including waste, agriculture, manufacturing, energy generation and recovery.
- **Landscape** – The Landscape work has been prepared by **Neil Furber (BSc, PGDip LA CMLI)**. Landscape Director at Pegasus Planning.
- **Lighting** – The updated Lighting Assessment has been prepared by **Strenger Limited**, who are Lighting Impact Assessment Specialists.



2.0 Summary of Changes

Table 1 below provides an overview of each chapter of the original ES dated April 2023. The Table shows the key findings of the original Chapters, any updates required as a combined result of the 2024 Design Changes and 2025 Design Refinements, and any material change in assessment findings that will incur as a result.

Where changes are identified in **Table 1**, updated ES chapters or technical reports have been appended to this Addendum. The ES Chapters which did not require a change are Chapters 1 Introduction, 7 Landscape and Visual, 8 Land Quality, 9 Transport, 10 Historic Environment and 11 Other Environmental Effects, for the reasons given in **Table 1**.

The ES Chapters and standalone technical reports which have been updated as a result of the combined 2024 Design Changes and 2025 Design Refinements are set out below:

- **Air Quality** (authored by Earthcare Limited) set out in the **Air Quality Impact Assessment Addendum (AQIAA) – Appendix F**
- **Ecology and BNG** (authored by BMD) set out in **BMD Ecological Assessment and BNG Report – Appendix E**
- **Flood Risk** (authored by SLR Consulting) set out in **Updated Flood Risk Assessment – Appendix G**
- **Landscape** (authored by Pegasus Planning) set out in the **Additional LVIA Material and Updated Landscape Strategy Plan and additional visualisation of the Proposed Development from the Cotswold Community (Viewpoint 10) requested by WC’s Landscape Office – Appendix C**
- **Noise** (authored by SLR Consulting) set out in **Noise Impact Assessment Update – Appendix D**
- **Lighting** (authored by Strenger) set out in the **Updated Lighting Assessment – Appendix H**

The review undertaken as part of this ES Addendum confirms that no further topics need to be ‘scoped in’ as a result of the design changes and refinements.



Table 1: ES Addendum Table

Environmental Statement Chapter	Summary of the findings/details of the ES as submitted in April 2023.	Required update to the ES	Changes to magnitude/significance in the ES
Chapter 1 – Introduction	Provides details on the prospective applicant (Acorn Bioenergy Limited); SLR Consulting, the proposed application; scope of the EIA, including background on the Scoping Opinion and EIA methodology; benefits of the development; and statement of competency.	No update - the proposed description of the development has not been amended and the scope of the EIA remains the same.	No Change - Chapter 1 is not an assessment of impacts and is instead descriptive (its purpose is to present the background, purpose and project scope).
Chapter 2 – Site and Surrounds	Describes the application site and surroundings, including planning history to provide the reader with an understanding of existing conditions and local context.	Minor Updates – the Planning History section has been corrected to provide the correct reference number for planning application 21/02520/REM at Cotswold Community. Chapter 2 has also been updated to include a list of major applications which have been approved or submitted since the AD facility application was made. The purpose of the list is to set out other major development occurring in the surrounding area, now, or likely to occur in the future.	No Change - Chapter 2 is not an assessment of impacts and is instead descriptive (its purpose is to present the Site location and provide context regarding the nature of the surrounding area).
Chapter 3 – Project Description	Chapter 3 summarises the Proposed Development, with reference to the original site layout (drawing reference 29419/P/101 - Rev F - Layout Plan). It provides a summary of how the anaerobic digestion facility would work in operation with a description of each component of the facility and their dimensions, operational hours, construction management, operational lifespan, vehicle movements and access, parking, materials and appearance, and lighting and security.	Minor Updates – minor updates were required to refer to the new Site Layout Plan (GGP Drawing Refs 29419/P2/101 Sheets 1 and 2) and the Updated Landscape Strategy Plan (Drawing No. P24-1022_EN_010_B_A1), (Appendix C) dated 12/06/2025 which	No Change - Chapter 3 is not an assessment of impacts. It is instead descriptive, with the purpose being to introduce the Proposed Development and how it would be constructed



Environmental Statement Chapter	Summary of the findings/details of the ES as submitted in April 2023.	Required update to the ES	Changes to magnitude/significance in the ES
		supersedes the 'Landscape Masterplan' (Figure 6 of the Landscape and Visual Impact Assessment in Chapter 7 of the 2023 ES. The updated Chapter 3 also includes updates to the Components Table, to amend the dimensions where the built form has been reduced and/or changed from that originally submitted. A summary and conclusions of the revised Lighting Strategy (Appendix H), completed in October 2025 is also included. A summary of the Applicant's Lightning Mitigation Design Strategy is also included.	and operated. The nature of the Proposed Development described in Chapter 3 remains the same as set out within the Application and has not been altered by the design changes. No changes are proposed in terms of the nature, scale or scope of construction activities. The proposed feedstock composition, quantities and digestate volumes remain unchanged.
Chapter 4 – Air Quality	Chapter 4 assesses the potential environmental impacts (upon human health and ecological conservation sites within the locale) of emissions to air associated with the Proposed Development. It relates to the Air Quality Impact Assessment (AQIA) appended to the ES and is referenced throughout the chapter. It concludes that: - The potential impact from traffic is determined to be insignificant. - The potential impact as a result of deposition from construction phase is not significant.	Updates undertaken and presented in the Earthcare Technical Air Quality Impact Assessment Addendum (AQIAA) – Appendix F. No associated changes to the construction phases of the Proposed Development in terms of the nature, scale or scope of construction activities. The proposed feedstock composition,	No Change – The Earthcare Technical Air Quality Impact Assessment Addendum (AQIAA) confirms that the design changes do not alter the findings of the 2023 AQIA. The potential for construction and operational related dust remain unchanged and 'not significant'.



Environmental Statement Chapter	Summary of the findings/details of the ES as submitted in April 2023.	Required update to the ES	Changes to magnitude/significance in the ES
	- There are no sensitive receptor locations within relevant EA screening distance criteria of potential on-site bioaerosol sources associated with the Proposed Development. Therefore, impacts are likely to be insignificant. - As the relevant standards are not predicted to be exceeded at locations where the either the long-term or short-term objective applies, the potential for impacts from the operation of the Proposed Development at human receptor locations are considered to be not significant. - Long-term air quality impacts of predicted concentrations at both the nationally and locally designated ecological conservation areas are determined as not significant. - The potential for impact on nationally and locally designated conservation sites as a result of nitrogen and acid deposition from the process is considered to be not significant. - Predicted air quality impacts are found not to be a constraint on the construction or operation of the Proposed Development.	quantities and digestate volumes remain unchanged. Odour abatement is increased in the proposed amendments. The AQIAA noted that the boundary of the Cotswold Water Park SSSI had been extended to include more lakes and habitat; the nearest of which include areas within 300m of the application 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.	During the operational phase, the potential to generate bioaerosol impacts at nearby sensitive receptors remains unchanged and is considered 'not significant' The predicted impacts of emissions to air remain 'not significant' and do not present a constraint to either the construction or operation of the Proposed Development.
Chapter 5 – Ecology (including Appendix 2 BNG Assessment)	Chapter 5 presents an assessment of likely impacts of the Proposed Development on biodiversity resources in line with the relevant professional guidance. This includes specific consideration of ecological sites, habitats, and species. Chapter 5 was supported by a Preliminary Ecological Appraisal (PEA) and a Biodiversity Net Gain Assessment. The chapter considered that there are potential significant impacts on a subsection of the ecological receptors including designated sites (Cotswold Water Park SSSI, Coke's Pit Lane LNR and North Meadow and Clattinger Farm SAC); habitats of principal importance (hedgerow); birds and bats. However, taking account of the avoidance, mitigation and compensation measures outlined in the chapter, no residual impacts are anticipated	Updates undertaken – see Appendix E. BMD have undertaken a new Ecological Assessment (August 2025), based upon the updated Site Layout Plans and updated Landscape Strategy Plan. The 2025 Ecological Assessment (document ref BMD.25.0155.RPE/P1.001) supersedes SLR's 2023 Ecological Impact Assessment (EcIA)).	No Change BMD's Ecological Assessment and BNG Report, provided at Appendix E, conclude that the predicted impacts of the design amendments to ecology remain 'not significant' and do not present a constraint to either the construction or operation of the Proposed Development.



Environmental Statement Chapter	Summary of the findings/details of the ES as submitted in April 2023.	Required update to the ES	Changes to magnitude/significance in the ES
	on the identified ecological receptors with the Proposed Development. The impacts are thus insignificant. Chapter 5 confirmed that with appropriate mitigation to impacts from air quality and hydrology, there will be “No change level of impact to statutory sites”.	The BMD 2025 Ecological Assessment confirms that the “<i>baseline conditions have been rechecked and remain accurate at the time of further survey</i>”. The BMD Ecological Assessment confirms that in relation to Great Crested Newts (GCN) the conclusions from the 2023 EcIA remain valid, and no further surveys are required. The 2023 Bird Surveys were also considered valid as there have been no significant changes to the baseline habitat. The BMD Ecological Assessment confirms that at the time of writing, it is considered that SLR’s conclusions in relation to statutory sites remains valid and that the proposed mitigation measures are sufficient to prevent significant adverse effects on the statutory sites. BMD have also prepared an updated Biodiversity Net Gain (BNG) Plan – September 2025 (Ref. BMD.25.0155.RPE.IA.002). In terms of BNG, the BMD report confirms that the design amendments will increase the total net unit creation of	There have been no significant changes to the baseline environment. The proposed mitigation measures are sufficient to prevent significant adverse effects on the statutory Sites. No significant direct or indirect impacts are anticipated on any statutory national or Local Wildlife Sites. As such, with standard mitigation and good ecological practice in place, the Proposed Development is not expected to result in any significant adverse effects on biodiversity, and the Proposed Development will remain in line with both NPPF policy and BNG principles. The development is capable of proceeding with no net loss to ecological function, and all residual effects are predicted to be neutral or minor adverse (temporary) at worst. Furthermore, the design changes have increased Habitat Unit creation by



Environmental Statement Chapter	Summary of the findings/details of the ES as submitted in April 2023.	Required update to the ES	Changes to magnitude/significance in the ES
		biodiversity delivered from 2.62 habitat units of 3.21 habitat units after Spatial Risk Multiplier (SRM). There is also a total net increase in hedgerow units from 6.77 to 3.26 after SRM deductions. The total percentage habitat biodiversity net change has increased to 20.33% and hedgerow biodiversity net gain is 72.18%. The positive habitat biodiversity unit change is based on the current enhancement proposals associated with enhancement of grassland, woodland creation and off-Site habitat enhancement. BMD have identified an outlier badger sett which will require a pre-construction badger survey to confirm whether the sett is still active. BMD also recommended that Tree T1 and T2 will require further verification surveys, to confirm the current bat roost status.	increasing on site and off site habitat creation.
Chapter 6 – Hydrology and Hydrogeology	Chapter 6 details the water resources (including both groundwater and surface water), flood risk and drainage of site and the surrounding area. It also identifies possible hydrogeological and hydrological impacts associated with the Proposed Development . The chapter concludes that although there is potential for adverse	Updates undertaken - The Applicant submitted an updated Drainage Impact Assessment report and drainage scheme drawings to WC in October 2024. These supersede the SLR 2023	No Change – GGP Consulting, who prepared the updated Drainage Impact Assessment and Drainage Scheme Drawings have confirmed that the proposed



Environmental Statement Chapter	Summary of the findings/details of the ES as submitted in April 2023.	Required update to the ES	Changes to magnitude/significance in the ES
	effects for a number of hydrological and hydrogeological receptors, through the appropriate use of a CEMP detailing good construction practices as well as the surface water drainage strategy being constructed as part of the development, there would be a limited effect on the hydrological and hydrogeological receptors within the Site boundary and within the surrounding area.	surface water drainage scheme as they align with the updated Site Layout Plans. An updated Flood Risk Assessment has been prepared by SLR, who authored the 2023 FRA, to assess the flood risk implications of the updated Site Layout Plans and proposed design changes. The updated FRA, attached at Appendix G supersedes the 2023 FRA.	design changes will have no material impact on the 2024 Drainage Impact Assessment Report and drainage scheme. There will be no increase in impermeable area, nor a change in the design approach or philosophy of the surface water drainage scheme. The updated FRA concludes that the proposed design changes will not make a material difference to the conclusions of the 2023 FRA. Therefore, no amendments to magnitude of change or predicted significance of effects have been required.
Chapter 7 – Landscape and Visual	Chapter 7 addresses the potential landscape and visual effects of the construction and operation of the Proposed Development. It made reference to the Landscape and Visual Impact Assessment (LVIA) which had been undertaken to determine the effects likely to arise because of the Proposed Development.	No update - the proposed 2025 Design Refinements would result in some noticeable landscape and visual improvements, however the changes would not be of such magnitude as to alter the overall magnitude of change or significance of effects, as set out in the LVIA Addendum (October 2024). The updated 2025 Landscape Strategy Plan will minimise views into the Site from Ashton Road	No Change - No material changes have been identified within the landscape and visual assessment and Landscape Strategy (attached at Appendix C) as a result of design changes. The proximity to sensitive receptors remains unchanged Therefore, no amendments to magnitude of change or



Environmental Statement Chapter	Summary of the findings/details of the ES as submitted in April 2023.	Required update to the ES	Changes to magnitude/significance in the ES
		and from other sensitive viewpoints, therefore providing an improvement to the scheme. An additional visualisation of the Proposed Development from the Cotswold Community (Viewpoint 10) has been prepared and submitted in response to a request from WC's Landscape Team.	predicted significance of effects have been required.
Chapter 8 – Land Quality	Chapter 8 considers the potential for environmental and health impacts both from and to land quality. It considers potential significant human health and environmental effects the Proposed Development (including earthworks and construction) would have on the baseline environment; the mitigation measures required to prevent, reduce or offset any significant adverse effects; and the likely residual effects after these measures have been employed. The chapter concludes that the impacts of the Proposed Development are not significant as it will: • Have a negligible impact on human health and minor impact on controlled waters during the construction phase. • Have a negligible impact on human health and controlled waters during the operational phase. • No significant effects in terms of the EIA Regulations are therefore predicted on land quality during the construction or operational phases of the Proposed Development.	No update – the 2023 Land Quality assessment, authored by SLR has been reviewed in relation to updated Site Layout Plans and the proposed Design Changes and Refinements and these will not make a material difference to the Land Quality assessment or conclusions.	No change – no material changes have been identified within the Land Quality assessment as a result of the proposed Design Changes and Refinements. Therefore, no amendments to magnitude of change or predicted significance of effects have been required.
Chapter 9 – Transport	Chapter 9 reports that the Transport Statement concludes that the impacts are not significant because:	No update – there are no changes to the proposed site access design or to the number or nature of vehicular	No change – no material changes have been identified within the Transport Statement as a result of the



Environmental Statement Chapter	Summary of the findings/details of the ES as submitted in April 2023.	Required update to the ES	Changes to magnitude/significance in the ES
	- The Proposed Development is acceptable in terms of operational capacity and highway safety. - The proposed traffic increase would be well within the determined thresholds specified within the IEMA guidelines. - The residual transport impacts are negligible/slight in terms of Noise & Vibration, Dust & Dirt, Driver Severance & Delay, Community Severance & Delay, Vulnerable Road Users and Road Safety. - The proposal is deemed acceptable in traffic and highways terms.	movements. Therefore, no updates are required to the ES as a result of the design changes..	proposed the design changes.
Chapter 10 – Historic Environment	Chapter 10 considers the potential impact of the development proposal on the Historic Environment. In particular, it considers the likely significant effects of the Proposed Development on designated and non-designated heritage assets. It concludes that: - The effect to all known and potential buried archaeological remains due to the Proposed Development is considered to be to be not significant in terms of EIA. - With regards to the potential for indirect impact to Ashtonfields Community Hall (Grade II listed building), no harm would be caused to the asset or any of the key contributors to its setting. The effect to this asset is considered to be not significant in terms of EIA. - Screening has already been proposed as part of the design for the Proposed Development, and this will contribute to minimising any possible effect on heritage. No additional mitigation is proposed in consideration to indirect effects. No cumulative effects have been identified.	No update – the nature of the proposed Design Changes and Refinements will not result in any changes to the potential impact to all known and potential buried archaeological remains, or the setting of the Ashtonfields Community Hall (Grade II listed building). As such, no updates are required to the ES. The Thames Valley Archaeological Services Working Scheme of Investigation (WSI) was approved by WC Archaeology in May 2025, and the subsequent Archaeological Evaluation Report was approved in July 2025. 46 trenches were dug across the Site and the Evaluation Report concluded that “The sparse quantity of dating	No change - no material changes have been identified within the 2023 Historic Environment assessment as a result of the proposed design changes or refinements. The results of the Archaeological Evaluation Report have not led to an amendment to the magnitude of change or significance reported in the 2023 ES.



Environmental Statement Chapter	Summary of the findings/details of the ES as submitted in April 2023.	Required update to the ES	Changes to magnitude/significance in the ES
		<i>evidence and other finds makes it hard to conclude with certainty the archaeological potential of the linear features in the middle of the site. The only potential for the site lies within the environs of the Late Bronze Age pit/well, despite the additional trenching not revealing any other features. The rest of site is considered to have low potential”.</i>	
Chapter 11 – Other Environmental Effects	Chapter 11 details other environmental effects which were taken into consideration during the assessment process. These include: • Human health; • Land use and land take; • Economy and employment; • Impacts on housing and services; • Residential amenity; • Risk of accidents; • Mitigation; • Monitoring; • Cumulative effects; and • Climate change. No significant environmental effects were identified that would either individually or cumulatively, result in significant adverse effects on the local population or upon land use.	No Update - Given the nature of the proposed Design Changes and Refinements, there are not considered to be any significant changes in terms of impact to human health, land use and land take, economy and employment, impact on housing and services, residential amenity and risk of accidents. A search of WC's and Cotswold Council's planning application portal has not identified any relevant planning applications submitted or approved since the original planning application was made that would lead to significant cumulative impacts. There has been no change to the nearest sensitive receptor.	No change – the updated Noise Assessment (attached at Appendix D), and updated Air Quality Assessment Addendum (Appendix F) confirm no material changes as a result of the design changes. Therefore, no amendments to magnitude of change or predicted significance of effects have been required.



Environmental Statement Chapter	Summary of the findings/details of the ES as submitted in April 2023.	Required update to the ES	Changes to magnitude/significance in the ES
		No significant effects have been identified, nor any findings that would change the conclusions reported in Chapter 11 of the ES, therefore, no updates are required.	
Chapter 12 - Conclusions	Chapter 12 summarises the findings of the ES and technical assessments.	Minor update – no material changes have been identified that would alter the level of significant effects set out in the ES, therefore, the conclusions set out in Chapter 12 remain the same. The only difference is in the BNG figures, set out in paragraph 12.4 of the 2023 Chapter 12. The 2025 BMD report, attached at Appendix E, confirms that the proposed design changes will lead to a 20.33% positive change in habitat units and a 72.18% positive change in hedgerow units (including all on site and off-site habitat retention, creation and enhancement).	No Change - There are no amendments to magnitude of change or predicted significance of effects reported in the 2023 ES and as a result, no consequential changes have been required in Chapter 12.
Non-Technical Summary	The Non-Technical Summary (NTS) provides a high-level non-technical language overview of the main findings contained within the ES.	Minor Updates made and presented in the Non Technical Summary Addendum 2025. Minor amendments are required to refer to the proposed d	No Change - The NTS does not include assessments (its purpose is to summarise the ES and ES Addendum).



Environmental Statement Chapter	Summary of the findings/details of the ES as submitted in April 2023.	Required update to the ES	Changes to magnitude/significance in the ES
		changes , up to date layout plans and Landscape Strategy Plan. However, there are no amendments to the majority of the NTS including description of development, red line boundary, or the magnitude of change or predicted significance of effects.	



3.0 Conclusion

The technical assessment teams have reviewed the 2025 Design Refinements in combination with the 2024 Design Changes previously submitted by the Applicant. They have confirmed that these would not result in any significant effects on the environment beyond the extent identified in the conclusions of the submitted 2023 ES.

Furthermore, the proposed design changes would lead to a reduced landscape and visual impact, improved odour abatement and increased Habitat Unit creation.



**Appendix A Updates to ES
Chapter 2: Site and
Surroundings and
Chapter 3: Project
Description**

Updates to ES Chapter 2: Site and Surroundings and Chapter 3: Project Development

1.1 Introduction

SLR Consulting Limited (SLR), on behalf of Acorn Bioenergy Ltd (the Applicant), have prepared this Environmental Statement (ES) Addendum to consider three minor design amendments (the 2025 Design Refinements) in combination with the design revisions previously submitted by the applicant in October 2024 (the 2024 Design Changes), to the proposed anaerobic digestion (AD) facility (the Proposed Development) at Land West of Ashton Road, Ashton Keynes (the Site).

The purpose of these updates to Chapter 2: Site and Surroundings and Chapter 3: Project Description is to present the updates to the description of the project which have arisen from the design changes.

The full results of the EIA review are reported separately in the accompanying ES Addendum which should be read alongside the original Environmental Statement (ES) submitted to Wiltshire Council (WC) in April 2023 (Application Ref. PL/2023/03359).

1.2 Context of the Proposed Amendments

In response to representations made during the consultation period on the Application, the Applicant amended the design of the Proposed Development in October 2024 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. The 2024 Design Changes comprised a comprehensive set of updated planning application drawings (c.27 in total), as well as new drainage plans and a Drainage Impact Assessment. 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.

The 2025 Design Refinements are now proposed following discussions with WC's planning and landscape officers in March 2025 which agreed the following three additional design improvements would deliver further betterments:

- A reduction in the height of the Chicken Manure Processing Building 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);
 - Enhancements to the landscape proposals, which will provide effective screening from early years of operation. This includes 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.

Updates to Chapter 2: Site and Surroundings

Chapter 2 includes a section on Planning History, within the surrounding area. The planning application Ref 21/0520/REM, listed in paragraph 2.12 requires correction to read as follows:

- 21/02520/REM Reserved matters application, pursuant to application 16/02609/OUT for the provision of 75 Dwellings & Associated Works Including Replacement of 27 Existing Dwellings and the Conversion of Existing Listed Buildings.

Since the AD facility application was submitted to WC, planning permission has been granted for sand at gravel extraction at Wheatley's Farm Quarry, approximately 2.5km southeast of the Site (Ref. PL/2023/03298).

The Air Quality Impact Assessment Addendum (AQIAA) (attached at Appendix F of the ES Addendum) considers the potential for cumulative effects of the Proposed Development being constructed and operated in combination with the following schemes which are proposed, under construction or completed within the surrounding area:

- Saxon Meadow, South Cerney, redevelopment of land at Berkeley Close, South Cerney, Cirencester -18/04656/REM, approximately 500m northeast of the application site.
- Cotswold Community, Ashton Keynes -21/02520/REM. Approved development of 75 dwellings approximately 350m southwest of the application site.
- The 'Steadings' mixed-use development at Chesterton, Cirencester 16/00054/OUT, approximately 4km north of the application site.
- Wheatleys Farm Quarry, Ashton Keynes - PL/2023/03298, approximately 2.5km south-southeast of the application site.

The 2023 ES included the Saxon Meadows and Cotswold Community (now King's Water) as sensitive receptors, therefore, the potential impacts on these sites have already been taken into consideration

The Steadings Development and Wheatley's Farm Quarry are considered to be too far from the application site for cumulative impacts to arise. In addition, it is noted that the Quarry would be subject to a routing agreement, to steer HGVs to the Spine Road and away from minor roads to the north of Ashton Keynes. More detail on the cumulative impacts is set out in the AQIAA.

The 2025 AQIAA also notes, in paragraph 4.1.6 that since the 2023 Air Quality Impact Assessment, APIS GIS data (accessed September 2025) has been updated to show the extent to which the nearest SSSI, the Cotswold Water Park (now Cotswold Lakes) has been extended to include more lakes and habitat; the nearest of which include areas within 300m of the Application Site.

As SLRs 2023 Ecological Assessment work and BMD's 2025 updated Ecological Assessment work considered the impacts on habitats within 500m of the Application Site boundary, we are satisfied that impacts on land within the extended SSSI have been considered. The Application Site remains free of any ecological designations.

Updates to ES Chapter 3: Project Description

The purpose of these updates to Chapter 3 is to ensure that the Chapter presents updated information where required and refers to the latest drawings and supporting documents.

The full results of the EIA review are reported separately in the accompanying ES Addendum which should be read alongside the original Environmental Statement (ES) submitted in April 2023.

The EIA Regulations require that the Environmental Statement (ES) should include a description of the development, which then provides a context for the assessment of the aspects of the environment likely to be significantly affected by the development, and the measures available to prevent, reduce and where possible offset any significant effects on the environment. These remain largely unchanged from the original submission, but the information below provides an update on the Proposed Development for which planning permission is now being sought.

The original description and dimensions of the components which will make up the AD Facility, based on the originally submitted Site Layout Plan Ref 29419 -101 Rev F, are set out in Table 3-1 of Chapter 3. The updated description and dimensions of the components is set out in **Table 1**.

The revised description and dimensions in **Table 1** below align with the revised layout shown in Layout Plans Sheets 1 and 2 Ref. 29419/P2/101/PO3, which were submitted to WC in October 2024 and the 2025 Design Refinement Drawings, set out in Section 1.3 of the Planning, Design and Access Statement Addendum.

Table 1 Description and Dimensions of AD Facility Components

Element	Description of Equipment/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 x3m 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
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 8,000m ³ .
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 in length tank, placed below ground

		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 bays 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
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.

1.3 Proposed 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 C** of the ES Addendum.

1.4 Lighting Assessment

The Applicant commissioned an Updated Lighting Assessment to reflect the updated design and site layout of the Proposed Development.

The Updated Lighting Assessment, dated October 2025, should be read alongside the following drawings that accompany it:

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

The Updated Lighting Assessment concludes that *“Based on the Assessed Scheme of Lighting, it has been demonstrated that the proposed development will be compliant with the residential receptor criteria as set out in the Institution of Lighting Professionals (ILP) Guidance Note GN/01/21. By demonstrating compliance with the ILP national guidelines, the proposals ensure that the impact of light pollution on local amenity is suitably limited, consistent with the requirements of the NPPF. Specifically, the Assessed Scheme of Lighting associated with the Proposed Development is compliant with the ILP post-curfew obtrusive light criteria for ILP Environmental Zone E2. The adopted criteria are as follows:*

- *‘Light intrusion’ limit of 1 lux (E - vertical illuminance)*
- *‘Glare’ limit of 0.29(d) to 500 cd (I - source intensity)*
- *‘Sky-glow’ limit of 2.5 % (upward light ratio)”.*

The levels of light spill to potentially light-sensitive ecological receptors are set out in Drawing SK-03 (light spill).

The following mitigation measures are integral to good lighting design, and have therefore been included in the Updated Lighting Assessment as a matter of course:

- the use of luminaires with zero direct contribution to upward light;
- adopting zero-degree luminaire uplift angles;
- careful aiming and positioning of luminaires;
- careful selection of luminaires;
- the use of lower output luminaires bounding potentially light-sensitive ecological receptors;
- the use of optimal light distributions for their specific location and orientation;
- optimisation of mounting heights;
- the use of presence detection controls and zoned switching;
- a 365-day timer clock and photocell controls;
- using the lowest colour temperature light sources practicable (3000K generally & 4000K for explosive atmosphere luminaires but only where 3000K is not available);

- the adoption of the lowest intensity LED modules practicable; and
- minimising the task illuminance level.

The following mitigation measures have been adopted in the design and planned operation of the Proposed Development:

- embedded by design, the siting of areas requiring a high level of illumination away from potentially light sensitive ecological receptors; and
- by risk-assessed design & operation (by others), not lighting the site access road mouth.

1.5 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.

Appendix B Applicant's letter to WC dated 24th October 2024



Olivia Tresise
North Planning Team
Wiltshire Council
Chippenham

24th October 2024

Dear Olivia

PLANNING APPLICATION REF: Ashton Keynes AD PL/2023/03359

Further to our considerable engagement with you, on behalf of the Council, over the summer months, I am now pleased to be able to provide you with a pack of documents that provides additional reporting plus the substitution of selected plans and reporting.

This submission has been prepared to address and respond to the consultation responses issued in relation to the current application by stakeholders and statutory consultees.

Having considered the comments provided by both consultees and the Council's statutory advisors we have taken considerable steps to evaluate our proposal and through a landscape led approach we have successfully reduced the bulk, mass and scale of the proposed structures whilst also enhancing the landscape mitigation. We are pleased to now be able to provide the Council with a suite of documents to either substitute a selection of those already submitted or to supplement the existing documents.

It is noteworthy that the site represents a typical example of intensively managed arable farmland bounded by hedgerows. The agricultural land is not high in value and the site is not located within any statutory or non-statutory landscape designations. The site is also well located for accessing the highway network and shares proximity to existing industrial and commercial uses.

As mentioned above we have taken considerable landscape led steps to reduce the bulk, height and scale of the proposed structures. The package of amendments to the application include embedded design measures including a reduction in height of the tanks in combination with the off-set of development from the site boundaries. The revised scheme also includes substantial enhancement to landscaping and further careful consideration of site levels to further reduce slab levels to decrease overall heights and associated visibility of structures from receptors. The proposed enhanced landscaping within the scheme will provide effective landscape screening from the early years of operation.

In addition, we have reviewed the elevational treatments of the proposed building and structures within the proposal to align materials and colours with commercial and agricultural Uses within proximity of the proposed site.

During October 2024 we reviewed the ecological baseline and an extended Phase 1 survey was carried out. This has been reported within the Ecological Technical Note which supplements this submission. The assessment concludes that the site has not significantly changed since the previous survey which forms part of the original application, which therefore continue to be considered valid.

This submission substitutes the existing drainage plans and Drainage Impact Assessment (DIA) due to the necessity to review the drainage strategy to align with the amended layout. The substitution DIA report concludes that the proposed drainage system can provide more than sufficient capacity to avoid any exceedance of the permitted discharge rate. In addition, the plant will harvest dirty water to be re-used within the AD process, whilst all run-off within the bunds will be collected and sampled prior to later discharge, or used on site. The report concludes that strict recording, and robust auditing in accordance with Environment Agency permits will ensure the performance of the system for the life of the facility.

We hereby wish to amend the submitted planning application documents as follows:

Document name	Existing Reference	Substitution/ additional Reference
Ecological Technical Note	NA	Technical Note (dated 17 th November 2024)
Drainage Impact Assessment	SLR FRA and Surface water strategy dated March 2023	DIA (Dated 9 th September 2024)
Drainage site layout plan 1of2	NA	29419/P2/103 PO1
Drainage site layout sheet 2of2	NA	29419/P2/103 PO2
Drainage details sheet 3	NA	29419/P2/108 PO1
Attenuation tank sections	NA	29419/P2/104 PO1
Site drainage catchment plan 1of2	NA	29419/P2/105 PO1
Site drainage catchment plan 2of 2	NA	29419/P2/105 Po2
Drainage details sheet 1. Clean water details	NA	29419/P2/106 PO1
Drainage details sheet 2	NA	29419/P2/107 PO1
Proposed section through wetland and weir	NA	29419/P2/109 PO1
Site layout for planning	29419/P/102	29419 F101 Rev A

Site layout sheet 1of 2	29419/P/101 F	29419/P2/101 PO3
Site Layout Sheet 2of2	29419/P/101 F	29419/P2/101 PO3
Site Section as proposed	29419-013 F102 D	29219- F102B
Site elevations as proposed	29419-013 F102 D	29419-F103B
Chicken shed – plans and elevations	29419	29419 F104 Rev A
Chicken shed sections and elevations	29419	29419 F105 Rev A
Fermenter Tank -plans, sections and elevations	29346 1000	-
33m DIA dome fermentor tank. Plans / sections / elevations	NA	29419 F106 Rev A
45m DIA fermenter tank plans and elevations	NA	29419 F107 Rev A
Straw bunker building – plans	29346 1014 Rev A	29419 F108 Rev A
Straw bunker building – elevations	29346 1014 Rev A	29419 F109 Rev A
Separator building – plans	29346 1006	29419 F110 Rev A
Separator building – sections and elevations	29346 1006	29419 F111 Rev A
Liquid storage tanks – plans sections and elevations	29346 1001	29419 F112 Rev A
3D renders as proposed	29419-013 F101 D	29419 F114 Rev A
Hard and soft landscaping plans	29419/P/120 Rev A	29419 120-1 PO1 29419 120-2 PO1
Enclosures plans	NA	29419 150-1 PO1 29419 150-2 PO1
Environmental Statement Ch7 LVIA	Chapter 7	Replacement chapter. V1 dated October 2024
Environmental statement Ch7 Appendices.	Chapter 7 Appendix A to D	Replacement Appendix 7.1-7.5
Environmental statement Ch7 figures.	Ch. 7 LVIA Figures 1-10.3	Replacement Figures 7.1 - 7.8

In conclusion the landscape led package of amendments have been developed to both maximise landscape mitigation whilst also maximising efficiencies in technology to ensure that the proposed biomethane generation facility will continue to deliver equivalent levels of biomethane production as the proposal presently before the Council. The efficiencies in technology ensure that although smaller in built form, this proposed facility can continue to contribute towards national objective of renewable energy production whilst also supporting energy security.

Importantly, this proposed facility will continue to support rural farming economies by providing reception to break crops and agricultural waste. The digestate produced by the facility as part of the anaerobic digestion process will also continue to be exported locally for use by farmers as a natural fertiliser. This in turn also reduces the reliance of farming on synthetic fertilisers which are often imported from abroad.

It is our view that this planning application remains aligned with the broad objectives of national policy and the development plan when considered as a whole with wider material considerations. The proposed package of amendments submitted within this pack take a significant step in further enhancing the merits of this much needed renewable energy generating proposal.

I look forward to receiving confirmation of acceptance of this pack of documents. Should you have any queries then please do not hesitate to contact me.

With kind regards,

SMThorpe

Sophia Thorpe MRTPI

Head of Planning

For and on behalf of Acorn Bioenergy Ltd

Appendix C Additional LVIA Material and Updated Landscape Strategy Plan



Ashton Keynes AD Facility: Replacement Landscape and Visual Material

Following the site meeting with Wilshire County Council on 7th March 2025, several changes to the scheme have been made to address issues raised by the Council and further minimise landscape and visual effects, where possible.

The following scheme changes have been made to further reduce landscape and visual effects, whilst ensuring that the AD Facility could safely operate:

- a) Reduced height of the manure processing building from 13m to 8.5m, to reduce overall massing of the building, where the upper parts of the building would be visible in early years from Ashton Road and the nearby public footpath (prior to the growth of mitigation planting);
- b) Inclusion of a native willow screen behind the perimeter fence along the access drive to minimise visibility of the proposed portacabins from Ashton Road; and
- c) Additional native wildflower planting to the northeast of the site, beyond the application boundary within the blue line control of the applicant, in order to maximise biodiversity net gain and enhance green infrastructure.

The replacement material to accompany the LVIA comprises:

Original submission	Replacement material
Appendix 7.2: Landscape Strategy Plan (P24 1022_EN_10A)	Appendix 7.2: Landscape Strategy Plan (P24 1022_EN_10B)
Appendix 7.3: Photomontages (P24 1022_EN_11)	Appendix 7.3: Photomontages (P24 1022_EN_11A)

Attention is drawn to the following changes in the replacement material:

- a) Addition of the willow hedge screen in Viewpoint 1: Photomontage Year 1 and Year 15;
- b) Reduced height of the Manure building in Viewpoint 2: Photomontage Year 1 and Year 15;
- c) Reduction in planting in Viewpoint 3 (Year 1) to better reflect immature planting;
- d) Clarification of the growth of recently planted hedgerow, to along the public footpath that would provide additional screening in Viewpoint 4 – Photomontage Year 15;
- e) Reduced height of the Manure building in Viewpoint 5: Photomontage Year 1 and Year 15;

33 Sheep Street, Cirencester, Gloucestershire, GL7 1RQ
 T 01285 641717 E Cirencester@pegasusgroup.co.uk
 Offices throughout the UK.

Pegasus Group is a trading name of Pegasus Planning Group Limited (07277000) registered in England and Wales.
 Registered Office: 33 Sheep Street, Cirencester, Gloucestershire, GL7 1RQ

Expertly Done.

DESIGN | ECONOMICS | ENVIRONMENT | HERITAGE | LAND & PROPERTY | PLANNING | TRANSPORT & INFRASTRUCTURE



- f) Reduced height of the Manure building in Viewpoints 6, 7, 8 and 9 as shown in the Photowires;
- g) Provision of an additional visualisation from the Cotswold Community (Viewpoint 10) at the request of Mark Goodwin, the Landscape Officer. The photowire view illustrates minimal visibility of the Proposed Development as predicted in the LVIA Addendum.

It is confirmed that the above changes would result in some noticeable improvements compared with the original scheme, however the changes would not be of such magnitude as to alter the overall magnitude of change or significance of effects, as set out in the LVIA Addendum. This result is reflective of the fact that the assessment methodology is relatively coarse, and whilst noticeable improvements would occur, these do not translate to changes to the significance of effects.

June 2025



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 sylatica	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
Sambucas 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











Appendix D Noise Impact Assessment Update



Appendix F Earthcare Technical Air Quality Impact Assessment Addendum (AQIAA)



Appendix G Updated Flood Risk Assessment



Appendix H Updated Lighting Assessment





Making Sustainability Happen