



Updated Non Technical Summary Addendum

Ashton Keynes Anaerobic Digestion Facility, Wiltshire

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Basis of Report

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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 design amendments have been made in direct response to representations made during the Application's processing 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 separately in the accompanying ES Addendum which should be read alongside the original Environmental Statement (ES), prepared by SLR Consulting and submitted to Wiltshire Council (WC) in April 2023 (Application Ref. PL/2023/03359).

1.1 Purpose of the Non Technical Summary Addendum

The purpose of this Non Technical Summary (NTS) Addendum is to present, in non-technical language, the results of the Environmental Statement (ES) Addendum which has been undertaken to assess the combined implications of the 2024 Design Changes and the 2025 Design Refinements on the Proposed Development and the conclusions of the 2023 ES.

The full results of the EIA are reported in the original Environmental Statement (ES) submitted in April 2023 as updated where necessary in the 2025 ES Addendum.

This document should be read alongside the original NTS from April 2023.

The topics considered in the April 2023 ES were:

- Air Quality
- Archaeology and cultural heritage
- Ecology
- Ground conditions/land quality
- Landscape and visual impact
- Traffic and transport
- Water Environment and Flood Risk.

For the reasons set out in the ES Addendum, there are no changes to Archaeology and Cultural Heritage, Ground Conditions and Land Quality or Traffic and Transport as a result of the 2024 Design Changes or 2025 Design Refinements.

Updates to the Air Quality, Ecology, Landscape and Visual, Noise and Flood Risk Assessment reports, are set out in appendices to the ES Addendum.

1.2 Summary of the Design Changes and Refinements

1.2.1 2024 Design Changes

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. 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. All of the information prepared for the 2024 Design Changes was submitted to WC in October 2024 and is available to view on their website.

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 17m;
- 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 Principles 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 Figures 2.3 and 2.4 below):

Figure 2.3 Original Design (Red Dotted Line) and October 2024 Design

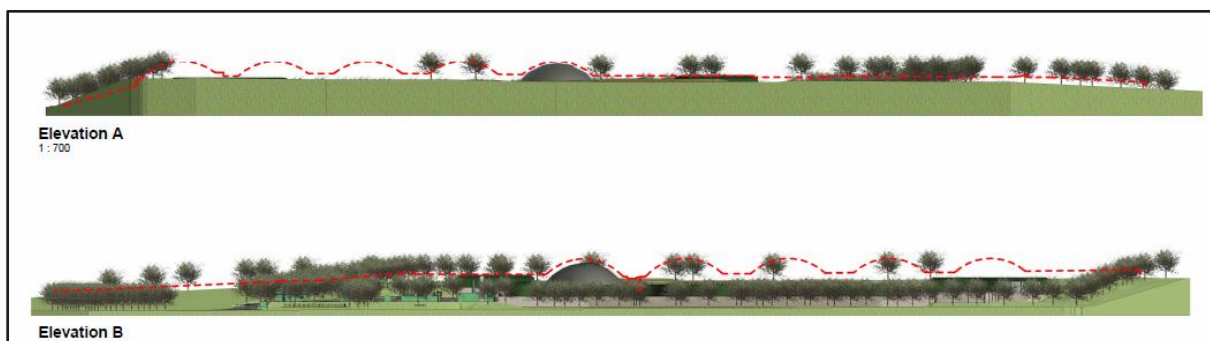
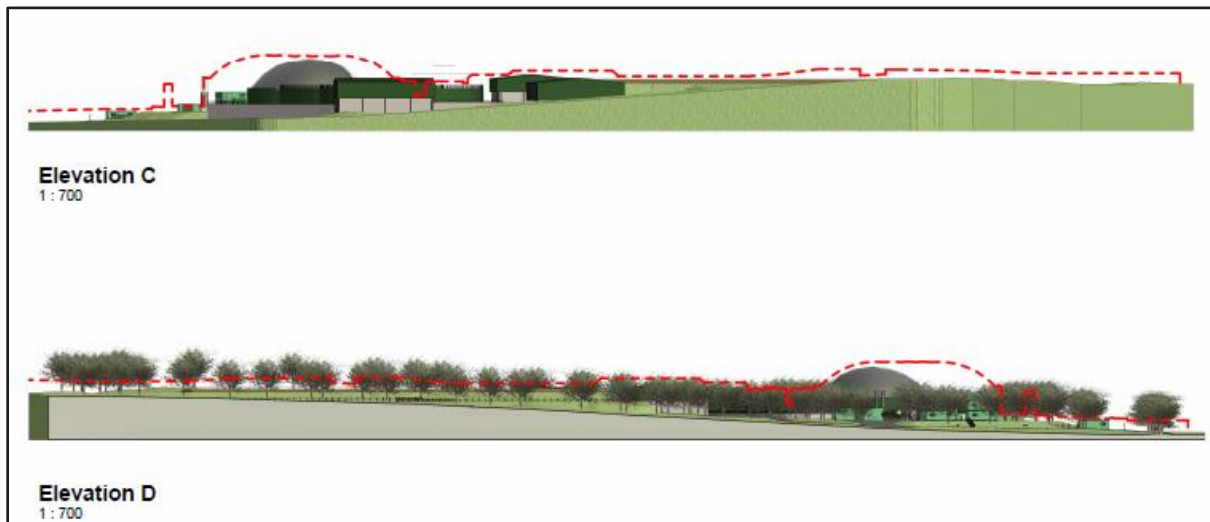


Figure 2.4 Original Design (Red Dotted Line) and October 2024 Design



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 Section 5.1 and Table 17 of the Updated AQIAA, appended at **Appendix F** of the ES Addendum.

1.2.2 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, attached to the 2025 Planning Design and Access Statement Update:

- 29419 F104 Rev D Manure Processing Building – Plans as Proposed (GGP);
- 29419 F105 Rev C Manure Processing Building - Sections and Elevations as Proposed (GGP);
- 29419 F115 Rev B Elevations Views – Previous and New Planning Scheme (GGP);



- 29419 F103 Rev C Site Elevations as Proposed (GGP);
- 29419/P2/102 Rev P02 Proposed Levels (GGP)¹; and
- P24-1022_EN_010_B_A1 L Landscape Strategy Plan (Pegasus).

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.

The principle of the Proposed Development, as well as the composition and quantities of the feedstock, remain unchanged. The proposed amendments have been assessed against the established guidance and parameters as well as technical assessment in the original ES to establish whether further technical assessment was required. The minor nature of the proposed amendments meant that no additional topic chapters needed to be added to (scoped into) the EIA assessment. The minor nature of the amendments in the overall proposed scheme mean that minimal updates are necessary, as detailed below.

1.3 Summary of the Changes to the 2023 Environmental Statement

1.3.1 ES Chapter 2: Site and Surroundings

Chapter 2 includes a section on Planning History. The planning application Ref 21/0520/REM, listed in paragraph 2.12 of the 2023 ES has been corrected 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.

Chapter 2 also notes that since the AD facility application was submitted to WC, planning permission has been granted for sand at gravel extraction at Wheatley's Farm Quarry, to the south of Ashton Keynes (Ref. PL/2023/03298).

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

1.3.2 Chapter 3: Description of Development

Chapter 3 of the ES has been updated to present the revised table of AD facility components, so that the component descriptions and dimensions align with the up-to-date Site Layout Plans (Sheets 1 and 2 Ref. 29419/P2/101/PO3) and all relevant Application Drawings (listed at Appendix 2 of the PDAS Addendum).

The updates to Chapter 3 also confirm that the updated Landscape Strategy Plan (Drawing No. P24-1022_EN_010_B_A1), dated 12/06/2025 and attached at **Appendix C** of the ES Addendum, supersedes the 'Landscape Masterplan' (Figure 6 of the Landscape and Visual Impact Assessment in Chapter 7 of the 2023 ES).

The results of the updated Strenger Lighting Assessment and Plan are also presented, and these confirm that although the 2025 Lighting Assessment (attached at **Appendix H** of the



ES Addendum) supersedes the 2023 Assessment, there is no change to the conclusions of the 2023 Lighting Assessment.

1.3.3 Flood Risk

An updated Flood Risk Assessment (FRA) has been prepared by SLR Consulting Ltd, (who completed the 2023 FRA), to assess both 2024 Design Changes and the 2025 Design Refinements. The updated FRA is attached at **Appendix G** of the ES Addendum.

Flood risk has been amended in line with BS 85333 (Assessing and Managing Flood Risk in Development), taking account of national and local planning policy and guidance, and all potential sources of flooding to the Site have been considered.

A screening assessment has reviewed the flood risk posed by sources including fluvial, tidal, surface water, groundwater, sewer, reservoirs, canals and infrastructure failure. The screening assessment concluded that the Site remains in Flood Zone 1 and, therefore, in terms of both the Exception and Sequential Tests, the Site is suitable for development.

Allowances for changes to peak river flows due to climate change have been considered with no changes to the original report FRA issued in 2023. The Site has been assessed to be outside of an area at risk of flooding over the 25-year lifetime of the Proposed Development. Therefore, the conclusions of the 2023 FRA remain valid, and the 2025 FRA supersedes the 2023 FRA.

The Surface Water Drainage Strategy was updated by GGP consultants and formed part of the 2024 Design Changes. – GGP Consulting have confirmed that the proposed 2025 Design Refinements 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.

1.3.4 Ecology

An updated Ecological Assessment has been prepared by BMD (document ref BMD.25.0155.RPE/P1.001) to assess the ecological impacts of the 2024 Design Changes and 2025 Design Refinements, including the updated Landscape Strategy Plan. The BMD Ecological Assessment provides an update to SLR's 2023 Ecological Impact Assessment (EclA) set out in Chapter 5 of the 2023 ES. A copy of the BMD Ecological Assessment is attached at **Appendix E** of the ES Addendum.

The BMD Ecological Assessment confirms that in relation to Great Crested Newts (GCN) the conclusions from the 2023 EclA remain valid, and no further surveys are required. The Ecological Assessment also confirms SLR's conclusions in relation to statutory sites remain valid and that the proposed mitigation measures are sufficient to prevent significant adverse effects on the statutory sites.

In terms of Biodiversity Net Gain (BNG), the BMD report confirms that the 2025 Design Refinements will increase the total net unit creation of biodiversity delivered from 2.62 Habitat Units to 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 net change has increased from 18.69% to 20.33% after the 2025 Design Refinements.

Whilst the Habitat unit creation has significantly increased within the 2025 Design Refinements by increasing on-site and off-site habitat creation, the outputs from the metric within the BNG assessment has provided variable outputs when compared to the original submission. The variation is likely due to an updated Spatial Risk Multiplier (SRM) deduction for off-site habitat creation, and re-classification of linear features within the current BNG metric toolbox, when compared to the earlier metric (version 3.1) which was correctly used by SLR at the submission stage.



The latest metric applies different distinctiveness bands for linear features such as hedgerows and existing trees, when compared to the earlier version of the metric and this adjusts the net change in BNG totals. Accordingly, further betterment in terms of BNG unit creation is achieved as a combined result of the 2024 Design Changes and 2025 Design Refinements when compared to the original proposal, and these findings are reported within the 2025 BNG assessment and reporting prepared by BMD.

BMD have identified an outlier badger sett which will require a pre-construction badger survey to confirm whether the sett is still active.

BMD's Ecological Assessment and BNG Report, provided at **Appendix E** of the ES Addendum, conclude that the predicted impacts of the design amendments and refinements to ecology remain 'not significant' and do not present a constraint to either the construction or operation of the Proposed Development.

There have been no significant changes to the baseline environment and the proposed mitigation measures are sufficient to prevent significant adverse effects on the statutory Sites.

1.3.5 Air Quality

Earthcare Technical, who prepared the 2023 Air Quality Impact Assessment, has prepared an Updated Air Quality Impact Assessment Addendum (AQIAA), that reevaluates the Proposed Development as amended by the 2024 Design Changes and the 2025 Design Refinements. A full copy of the AQIAA is attached at **Appendix F** of the ES Addendum.

During the operational phase, the potential to generate bioaerosol impacts at nearby sensitive receptors remains unchanged and is considered **not significant**. Odour abatement measures have been increased by the 2025 Design Refinements, ensuring that any potential odour impact remains **not significant**.

In terms of impacts on ecological receptors, paragraph 4.1.6 of the Updated AQIAA confirms that since 2023, the boundary of the Cotswold Lakes SSSI has 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 summary, the AQIAA confirms that the design amendments do not affect the findings of the 2023 Air Quality Impact Assessment. 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

1.3.6 Noise

A Noise Assessment Update has been undertaken by SLR, who authored the 2023 Noise Assessment, to consider the noise implications of the 2024 Design Changes and 2025 Design Refinements. A copy of the Noise Assessment Update is attached at **Appendix D** of the ES Addendum.

The Noise Assessment concludes that the 2024 Design Changes and 2025 Design Refinements would not be of such magnitude as to alter the magnitude of change or significance of effects set out in the March 2023 Noise Assessment. Noise should not present a constraint to the construction or operation of the Proposed Development. Mitigation has been included in the noise emissions predictions, to include proprietary plant equipment attenuation including CHP stack silencers.



1.3.7 Landscape and Visual

In response to representations made during the processing of 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. These amendments are listed in Section 1.2.1 of this NTS Addendum.

Following discussions between the Applicant and WC's Landscape and Planning Officers on Site in March 2025 a number of Design Refinements, set out in Section 1.2.2 of this NTS Addendum are now proposed. An updated Landscape Strategy Plan (P24-1022_EN_010_B_A1 L) to show the combined effect of the 2024 Design Changes and 2025 Design Refinements has been developed by Pegasus Group and is appended to the ES Addendum, in **Appendix C**.

The Landscape Strategy Plan includes a native willow screen behind the perimeter fence along the access drive to minimise visibility of the proposed portacabins from Ashton Road. It also includes 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.

Pegasus Group have confirmed that the proposed March 2025 Design Refinements would result in some noticeable 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).

An extract of the Updated Landscape Strategy Plan is set out in **Figure 1.1**.



Figure 1.1 Updated Landscape Strategy Plan



Source: Pegasus Group Drawing Number P24-1022_EN_010_B_A1 L dated 12/06/2025



1.3.8 Other Environmental Effects

Given the nature of the proposed 2024 Design Changes and 2025 Design Refinements, there are not considered to be any significant change 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 arising from the proposed amendments.

The Public Right of Way (PRoW) will remain open during construction and will remain unaffected by the Proposed Development.

In terms of cumulative impacts, a search of WC's and Cotswold Council's planning application portal has not identified any relevant planning applications submitted or determined since the original planning application that would lead to significant construction or operational cumulative impacts.

2.0 Conclusion

The 2023 ES Chapters and Technical Reports have been reviewed against the 2024 Design Changes and 2025 Design Refinements, and it has been confirmed that these changes and refinements would not result in any significant effects on the environment beyond the extent identified in the conclusions of the 2023 ES.

Furthermore, the proposed 2024 Design Changes and 2025 Design Refinements would lead to a reduced landscape and visual impact, improved odour abatement and increased Habitat Unit creation.





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