

## **Comments on Locational Justification Presentation**

Three new documents have appeared on the planning page on or around 17<sup>th</sup> February with dates from 5<sup>th</sup> November 2025 to 21<sup>st</sup> January 2026. Why were these documents not uploaded when they were received? Does the planning officer hold other evidence/submissions that has not been put on the public register?

The locational justification report appears to be a presentation document rather than a submission. If the developer has made a presentation to planners then objectors should be given the opportunity to make a presentation to the same individuals.

The locational report contains numerous erroneous statements. The purpose of this submission is to correct those statements.

**Context** – Acorn states that “the plant needs agricultural feedstock (only) to operate”. This is wrong and grossly misleading. The plant requires a very significant supply of natural gas to fuel the CHP units. Dependent upon plant configuration, this could equate to the gas consumption of approximately 1760 dwellings (see my comments on the carbon calculations of 4<sup>th</sup> November 2025).

**Locational Requirements** – “Proximate and central to the farms that supply us” - all locations in the area of search would be proximate to feedstock. “Minimising transport distances” – alternative locations could have lower transport emissions since they would be immediately surrounded by farming areas rather than lakes, quarries and villages. “Minimum site size of 6ha” – this is not a requirement. Acorn’s The Three Maids site, which is operational, is a site of 4.5ha. “Accessibility to a gas pipeline injection point” – Banbury is not a proximate gas injection point. It is approximately 50 miles from the site. “Good access to the strategic road network” – Acorn have made no assessment of the road network in Gloucestershire over which a significant proportion of the feedstock will arrive. The site entrance is on a C road. By comparison, Three Maids feeds directly onto an A road.

**Benefits to Farming Community** – the benefits can all be achieved by any location in the search area. The Ashton Down site fails the sensible objective criteria set out in my submission of 29<sup>th</sup> October 2025. Many of these issues are not planning considerations.

**Environmental Constraints** – there is no policy that excludes an anaerobic digester being approved within the Cotswold Landscape. Some of the larger farms within the CL might offer more appropriate sites where the scale of development would not be out of scale with other farm buildings. The statement that “there are no alternative sites with better road access within the feedstock area” is unsupported by objective criteria or assessment. Its simply a bland and misleading statement.

Overall, my comments of 29 October 2025 very clearly set out the alternative site argument and demonstrate that Ashton Down is not a suitable site for this development.