

Supplementary representation — Application PL/2023/03359

To: Ruaridh O'Donoghue, Principal Planning Officer, Wiltshire County Council

From: Somerford Keynes Parish Council **Date:** 12th May 2026

Subject: Application PL/2023/03359 — procedural consultation gap on aerodrome safeguarding (RAF Fairford, RAF Brize Norton and Cotswold Airport)

Dear Mr O'Donoghue,

I am writing on behalf of Somerford Keynes Parish Council, as an objector to planning application PL/2023/03359, the proposed anaerobic digestion facility at land off Ashton Road, Ashton Keynes.

This is a supplementary representation drawing the Council's attention to what appears to be a material procedural gap in the consultation undertaken on the application.

A review of the publicly available application pack, including the Environmental Statement (Chapters 1 to 12 and the V3 Addendum), the Air Quality Impact Assessment Addendum (October 2025), the Planning Design and Access Statement and its Addendum, the Updated Non-Technical Summary Addendum, the agent's responses to consultee and public comments, and the application form was unable to find a reference anywhere in the pack to the Ministry of Defence, the Defence Infrastructure Organisation, the Civil Aviation Authority, RAF Fairford, RAF Brize Norton, Cotswold Airport (Kemble, EGBP), aerodrome safeguarding, low flying, aircraft, thermal plume modelling for aviation purposes, or bird hazard management. No consultation response from any aviation interest is on the public file.

Subsequent communications over the course of 11th and 12th May 2026 with the Squadron Leader of RAF Fairford and RAF Welford, the Defence Infrastructure Organisation Safeguarding (DIO) Team and the CEO & Group MD of the Cotswold Airport Group have confirmed they have not been consulted on this application.

1. Statutory consultation with the Ministry of Defence

The site falls within the statutory safeguarding zones of RAF Fairford and potentially RAF Brize Norton. The Defence Infrastructure Organisation, in its 12 December 2022 representation to Cotswold District Council on the Fairford Neighbourhood Development Plan, confirmed that the wider Fairford area is "washed over by statutory safeguarding zones drawn to ensure that the operation and capability of both RAF Fairford and RAF Brize Norton is not compromised or otherwise degraded by development."

Consultation with the Ministry of Defence is required under the Town and Country Planning (Safeguarded Aerodromes, Technical Sites and Military Explosives Storage

Areas) Direction 2002 where development meets the trigger criteria within those zones. The application meets several of the criteria cited by DIO in its December 2022 letter:

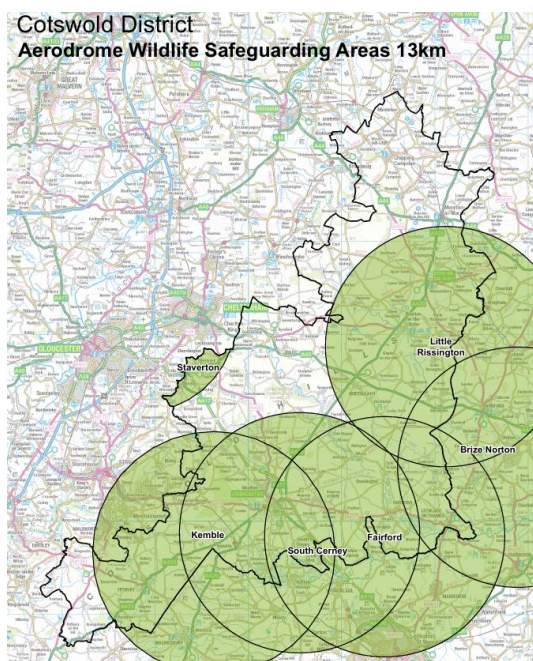
- The single Post Digester Tank exceeds the **15.2 metre** local height threshold (16.5 metres total height to top of dome, per Environmental Statement Addendum V3, Appendix A and the PDAS Addendum).
- The digester tanks and storage tanks are **clad and constructed in metallic materials**.
- The site lies within the **12.87 kilometre wildlife circle** drawn around RAF Fairford. Within this circle, DIO is to be consulted on developments comprising or including refuse tips, waterbodies, sewage disposal works, nature reserves, bird sanctuaries, and on landscaping, green or brown roofs and SuDS systems where these may be attractive to large or flocking bird species. The proposed development includes covered digestate storage lagoons of 16,000 cubic metres combined, two carbon-filter lagoon vents, dirty water tanks, and a SuDS attenuation system.

The application pack contains no DIO consultation response, no Ministry of Defence response and no thermal plume assessment, building-induced turbulence assessment or bird hazard management plan.

I would be grateful for confirmation that the Council has discharged its statutory consultation obligation under the 2002 Direction in respect of both RAF Fairford and RAF Brize Norton (where relevant), and that any response received has been placed on the public file.

2. Advised consultation with Cotswold Airport and the CAA

Cotswold Airport (Kemble, EGBP) is approximately seven kilometres west of the application site and is a fully licensed aerodrome under CAA Ordinary Licence P863.



The site for the anaerobic digester sits within Aerodrome Wildlife Safeguarding Areas for both Cotswold Airport and RAF Fairford, as illustrated in this map.

The CAA's Combined Aerodrome Safeguarding Team (CAST) and good practice in determining applications affecting licensed aerodromes both advise consultation with the aerodrome operator and the CAA where development could affect aerodrome operations.

A 10.51 metre enclosed emergency flare discharging biogas combustion products at 1,000°C and an exit velocity of 24.3 metres per second (per Air Quality Impact Assessment Addendum October 2025, Table 3), together with two continuously operating CHP stacks and an emissions abatement stack, is plainly capable of affecting the operations of a licensed aerodrome at this distance.

3. Substantive matters the missing consultations would address

The substantive aviation safety issues that DIO, the CAA and Cotswold Airport would be expected to assess have not been considered anywhere in the application:

- **Thermal plume rise** from the 10.51 metre emergency flare and from the continuous CHP and abatement stacks, against CAA vertical velocity criteria. The applicant's air quality modelling has assessed plume behaviour only against ground-level air quality standards, with all human and ecological receptors modelled at 1.5 metres.
- **Building-induced turbulence** generated by the digester tank array and ancillary structures.
- **Bird strike risk** arising from open and covered water surfaces, digestate storage, SuDS and the wider landscaping, in an area already characterised by waterbodies that produce, in DIO's own words to CDC, "a substantial population of waterfowl and other species which have the potential to be hazardous to aviation safety."
- **Low flying activity** in the area between RAF Fairford, RAF Brize Norton and Cotswold Airport, including the operational rotation at RAF Fairford which includes B-52, B-2, B-1 and U-2 aircraft.

Highland Council refused planning permission for an anaerobic digestion facility at Easter Airfield in 2023 in part on the basis that thermal plumes from gas flaring, CHP coolers, refrigerant units and other heat sources had not been adequately assessed against aviation safety criteria. The decision is direct precedent for the kind of assessment that should be in front of any LPA determining an AD application within the safeguarded zones of an active aerodrome.

4. Requests

I would be grateful if the Council could:

1. Confirm consultation will take place with the Ministry of Defence (Defence Infrastructure Organisation) on this application under the Town and Country Planning (Safeguarded Aerodromes, Technical Sites and Military Explosives Storage Areas) Direction 2002 in respect of RAF Fairford and RAF Brize Norton, and place any response received on the public file.
2. Confirm consultation will take place with Cotswold Airport.
3. Confirm consultation will take place with the CAA Combined Aerodrome Safeguarding Team (CAST), and place any response received on the public file.

4. Undertake the above consultations before the application is reported to committee, and require the applicant to submit any thermal plume, building-induced turbulence and bird hazard assessments that the consultees consider necessary.
5. Defer determination of the application until those consultations are complete and any required assessments have been received **and made available for public comment**.

I would be grateful for an acknowledgement of receipt and an indication of when the Council expects to be in a position to respond on the points above.

Yours sincerely,

Andy Clark

Chair-Somerford Keynes Parish Council

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- Defence Infrastructure Organisation, Safeguarding Department: DIO-safeguarding-statutory@mod.uk
 - CAA Combined Aerodrome Safeguarding Team (CAST): cast@caa.co.uk
 - Cotswold Airport, Safeguarding contact ops@cotswoldairport.com