



South Cerney Parish Council

South Cerney Parish Council (SCPC) maintains its strong objection to this application and would like to draw the planning officer's attention to the list of expert opinion summarised below. We urge the planning officer to consider this evidence carefully as it validates our objections raised below and in our previous submissions. Finally, we request confirmation that this expert advice has been shared with all of the relevant statutory consultees and that they have been specifically consulted on pertinent issues arising.

- **WC-26-05-374206, South Cerney Parish Council**

Legal Opinion on application of Finch principle to Ashton Keynes AD

- **WC-25-11-355007, JBA Technical Note Q25-2520**

Failure to adequately assess any contamination risks to controlled waters associated Protected Areas and other receptors such as other water abstractors and the misrepresentation of the environment setting and levels of risk.

- **WC-26-05-375601, Nick Dye, Wiltshire Council's Portfolio Holder for Flooding and Water Quality**

SSSI contamination Risk and flood infrastructure concerns

- **WC-26-04-369321, Laurence King, Cotswold District Council Flood Officer**

Groundwater ingress and drainage risks, and digestate storage/disposal

- **WC-26-05-371737, Dr Nicholas Geoffrey Cartwright**

- **WC-26-04-370736, Dr Nicholas Geoffrey Cartwright**

Established pollutant pathway and absence of a Groundwater Risk Assessment, and absence of a suitable digestate management plan and storage/disposal arrangements.

- **WC-26-05-375370, Colin Godfrey**

Failure to comply with policies in WDC1, WDC 4 and WDC 11 of the Waste Core Strategy

- **WC-25-11-354933, Simon Messer on behalf of a registered member of the Institute of Acoustics**

SLR's Noise Assessment methodology contains several material weaknesses

- **WC-26-06-376979 James Thomson**

Technical objection on hydrogeology

- **WC ref TBC, Chris Jackson, Cotswolds Local Visitor Economy Partnership**



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Impact on the economy

- **WC-26-06-376944, Gloucester Highways**

We would also draw the planning officer's attention to:

- Appendix A. A consolidated list of policies which this application breaches or ignores
- Appendix B. A list of recommended conditions to be imposed were the AD to be approved

Introduction

The Planning Officer's summary states that "*Significant weight is afforded to the renewable energy, carbon reduction and rural economic benefits of the proposal, which are considered to outweigh the residual harms.*" This objection challenges this decision and cites a number of independent expert opinions to support our view.

The Parish Council's continued objection can be summarised by the following:

- 1) Climate / Environmental
- 2) Economic
- 3) Location

Both the calculations, and the methodology, of this application's claimed greenhouse gas (GHG) benefits have been challenged by legal counsel and by Mr Colin Godfrey. Further details are provided in **point 1)** of this objection.

The application runs counter to the success over the years of the Wiltshire Core Policies numbers 54 (*Cotswold Water Park**), 50 (*Bio- and Geo-diversity*), 34 (*Additional Employment Land*) and 51 (*Landscape*), which have delivered a thriving tourist industry involving hundreds of thousands of tourists a year, hundreds of local jobs, with millions of pounds generated for the local economy. This proposal, if granted, will pose a high risk to a continuation of this success. This risk will be quantified in **point 2)** of this objection. As such, this is fundamentally in conflict with Policy WDC 4.

**Known as the Cotswold Lakes since 2025.*

Point 3) of this objection will highlight the flawed methodology used for choosing the location specified in the application.



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1) Climate / Environmental

The claimed climate / environmental benefits are incomplete and legally flawed.

a) Greenhouse gas (GHG) benefit considerations

i)

- In previous representations, South Cerney Parish Council (SCPC) raised concerns about the assessment of the climate impacts of the proposed AD Plant in the Environmental Statement, in particular whether the principles in *R (Finch) v Surrey County Council and others* [2024] UKSC 20 means that an assessment of the downstream combustion emissions from the biomethane is required.
- SCPC therefore obtained formal legal advice from Dr Lane, specialist Counsel of Cornerstone Barristers, Gray's Inn, London. That specialist legal advice was submitted to Wiltshire Council on 13th May, for consideration by Council officers and the Committee.
- The legal advice from Counsel is clear. The implication of the Supreme Court's judgment in *Finch*, and also the judgment of the High Court in (1) *Friends of the Earth*; (2) *South Lakes Action on Climate Change v (1) Secretary of State for Levelling Up, Housing, and Communities*; (2) *West Cumbria Mining* [2024] EWHC 2349 (Admin), is that the full extent of the greenhouse gas (GHG) emissions caused by the combustion of the biomethane produced by an AD Plant **should** be quantified and assessed, to enable Committee members to determine the application with full information regarding the climate effects of the AD Plant.
- Therefore, if there is a *failure* to assess those GHG combustion emissions, and the Committee were to grant permission for the AD Plant, such a decision in those circumstances would make Wiltshire Council susceptible to Judicial Review, as in the *Finch* case.

- ##### ii)
- Notwithstanding the issue in 1) a) i), the officer's April assessment of GHG calculations fails to take account of significant local emissions and fails to take these local emissions into the planning balance. Furthermore, Mr Colin



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Godfrey, in his submission on 06 May 2026, demonstrates that the data used as input understates local emissions as it fails to account for: gas that is flared at either Ashton Down or Banbury; any leakage of biogas or biomethane; or the need to deliver digestate outside of the ten-mile radius owing to nitrate restrictions local to the site. In addition, no account has been taken of any movement of the 15,000 tonnes (500 HGVs' worth) of chicken-litter from the Wye Valley.

b) Issues with Groundwater.

- i) Officers have ignored an independent technical report from the consultant engineers at JBA, who have many years' experience of ground-water flow in the Cotswold Lakes. The report says this site is in a Nitrate Vulnerable Zone and in Groundwater Source Protection Zones 2 and 2c. It says shallow groundwater has already been found and this must be treated not only as a receptor, but also as a pathway to the SSSI. The applicant's Environmental Statement assumes a clay layer acts as a complete seal, but the JBA report says the evidence clearly does not justify that confidence.

JBA also says the drainage ditch has not been properly traced, and that the application relies on assumptions about a supposedly safe drainage route, even though the drainage appears to run downhill towards the SSSI.

Dr Nicholas Cartright, in his submission on 04 May 2026, goes into further detail, and describes no fewer than seven grounds for objection. He points out that the Cotswold Lakes is the largest marl-lake system in the UK, and includes the largest inland beach in the UK. The lakes are interconnected and intolerant of nutrient enrichment. Any leak from the anaerobic digester would result in eutrophication, the effects of which are not reversible on a planning timescale.

c) Digestate storage.

- i) Dr Nicholas Cartright, in his submission on 30 Apr 2026, shows that the application has not considered that 117,000 tonnes (the equivalent of over 40 Olympic-size swimming pools) cannot lawfully be stored, transported and applied to land, within the constraints of current legislation.



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2) Economic

The claimed economic benefit is incorrect. Somerford Keynes' Parish Council's submission (10 May 2026) describes a recent survey of over 40 leisure-based local businesses, employing 800 staff, attracting over 700,000 visitors and generating over £43m in revenue. A modelled scenario, assuming a minimum level of impact, gives a loss of 30–50 jobs and a loss of over £2m of tourist revenue per year (this excludes costs of environmental damage). This loss in local jobs outweighs the five that are claimed would be created in the running of the anaerobic digester.

Mr Alasdair Kennedy, of SCPC, in his submission on 13 May 2026, presents evidence that 85% of anaerobic digesters have leaked. This is represented as a “High” probability on a risk matrix (shown below). When coupled with a “High” impact (30 to 50 local jobs lost, over £2m revenue lost per year and a devastating effect on wildlife and the environment), the selection of this particular location translates into a “High” risk application (red square). This site and the proposed mitigation plans are not sufficient for such a high-risk application.

		Impact		
		Low	Medium	High
Probability	High	Low	Medium	High
	Medium	Low	Medium	Medium
	Low	Low	Low	Low

In addition, Mr Kennedy:

- Details the potential health risks posed by the anaerobic digester, which the applicant has neglected to mention.



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- Discloses that Acorn is not a member of the industry body, the Anaerobic Digestion and Bioresources Association (ADCS); and as of August 2025, had only one anaerobic digester in operation in the UK. This indicates Acorn's relative inexperience in the industry.

3) Location

Aside from being situated in the Cotswold Lakes and 300metres from a SSSI, the application is sited in the wrong location for several reasons:

- Risk to climate and the environment (point 1 above).
- Risk to the economy (point 2 above).
- Risk to health.

The Spine Road (B4696) is a local accident black-spot and a key diversion-route for A419 closures. It is also used by tourists, walkers, cyclists, triathletes and is the access route to numerous holiday-home sites and businesses. In summer, HGV movements will rise to 160 per day, coinciding with the peak traffic periods for tourism, quarry vehicles and numerous sporting events. The increased traffic on this road and surrounding country roads represents a serious road-safety issue.

- Risk to South Cerney Parish's thriving economy.

South Cerney's businesses are largely dependent on tourist trade, with over 17% of people employed in hospitality: there are 1000 holiday homes around the lakes (which are all SSSIs and cover one-third of the parish), and the De Vere hotel, which has 170 rooms. There are also sailing lakes, fishing lakes, swimming lakes, jet-ski lake, other recreational lakes as well as a major holiday park in Cotswold Hoborne. These livelihoods would be threatened by the application, which as has been noted in point 2 above, has an 85% likelihood of having a leak in its lifetime, the effects of which are not reversible (point 1 above).

In addition, alternate, more suitable, locations have not been considered by the applicant, in contravention of EN1, EIA and NPPF. Mr Colin Godrey's submissions on 13 May 2026, 19 February 2026 and 29 October 2025, describe in detail the



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inadequacy of the applicant's justification for the location chosen. Such failure to consider alternative sites is a fundamental error, which could leave Wiltshire Council having to defend its position at Judicial Review. Any alternative site could deliver all of the benefits of the scheme without the substantial harms and risks that are specific to this chosen site.

Summary

This application puts an industrial gas-plant in the wrong place, on the wrong roads, and with too many serious environmental, climate and health risks still unresolved. Further, it seems likely that granting the application, as it stands, will be unlawful; it is unclear whether any future changes to the application would mitigate this. South Cerney Parish Council respectfully requests refusal.



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Appendix A - Policies breached or ignored

South Cerney Parish Council considers that the following policies have been either breached or ignored in the consideration of the application.

National Planning Policy Framework	
NPPF	National policy requires that safe and suitable access can be achieved for all users, and that development should only be prevented or refused on highways grounds where the residual cumulative impacts on the road network would be severe. The formal highway-engineering objection concludes precisely that — the cumulative impact is ‘severe’. National Highways, the statutory body for the Strategic Road Network, recommended refusal of a comparable anaerobic digestion proposal on the A419 corridor after concluding that no enforceable mechanism existed to ensure hauliers followed the planned route. The same unanswered question of routing enforceability applies to this application, compounded by the absence of any Digestate Management Plan.
Paragraph 115	Requires that any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree through a vision-led approach. Gloucestershire Highways report is not satisfied that this requirement has been met.
Paragraph 116	Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios. Gloucestershire Highways report is not satisfied tha residual cumulative impacts would not be severe.



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Paragraph 187	Planning policies and decisions should contribute to and enhance the natural and local environment by: preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality. This proposal, carries a pollution risk that contravenes this requirement.
Paragraph 193	When determining planning applications, local planning authorities should apply the following principle: development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted . The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest
Waste Development and Criteria Policies	
WDC1	WDC 1 requires that all waste proposals minimise the impact of transporting waste to and from the site, and avoid adverse impacts on the water environment and flood risk. Neither requirement is met. Feedstock — including chicken litter — is imported from the Wye Valley; processed biomethane is exported to an undisclosed location, possibly Banbury. This is not minimisation of transport in any meaningful sense. An alternative site within the same 10-mile radius search area, away from the SSSI, Groundwater Protection Zone 2, and the surrounding lake and housing network, could have accommodated locally sourced feedstock over shorter distances — yet no alternative site assessment has been submitted. The adverse impact on the water environment is not avoided: the site sits within GPZ2, groundwater is found at 0.43–1.35m depth, and the applicant's own Flood Risk Assessment confirms a direct ditch pathway to SSSI lakes 300–500m away. The Officer's April report concluded WDC 1 was satisfied; that conclusion was reached without reference to the Wye Valley chicken litter imports or the absence of any alternative site search. Conflict with WDC 1 is clear and was not brought to the Committee's attention on 21 April 2025.



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WDC 4 Protection of Recreational Assets	This is the key operative policy for a waste facility proposal of this kind. WDC 4 provides that proposals which would have a significant adverse impact upon tourism or recreational facilities will not be permitted unless mitigation measures are adopted. The AD plant would cause demonstrable harm to the Cotswold Water Park visitor economy — 1,000,000+ annual visitors, £43 million in local spending, 1,000+ jobs — through odour drift, landscape industrialisation, HGV traffic, and reputational damage. The applicant has not proposed, and the submitted Environmental Statement does not contain, any tourism or leisure mitigation measures. This is an unambiguous conflict with WDC 4. The site falls within the Cotswold Water Park Designated Boundary as confirmed by the Wiltshire policies map as of March 2009, as do the villages of Ashton Keynes, Somerford Keynes, and South Cerney. The importance of leisure and tourism within the Cotswold Water Park has been comprehensively demonstrated in the Somerford Keynes Parish Council's Objection of 10 May 2026. On the basis of this policy alone, the application should be refused.
WDC 11 Sustainable Transport of Waste	WDC 11 requires waste management facilities to facilitate sustainable transport, including minimising transport distances and the production of carbon emissions, and to assess potential cross-boundary and cumulative transport impacts. None of these requirements are met. Transport distances are not minimised: feedstock travels from the Wye Valley; digestate is distributed across a wide rural area on unassessed minor roads; energy product is exported to an undisclosed location, possibly Banbury. Carbon emissions from transport are therefore substantially higher than necessary and higher than they would be at any better-located alternative site. No assessment of cumulative or cross-boundary transport impacts has been submitted — yet the traffic impacts extend into Gloucestershire, Oxfordshire, and beyond for the Wye Valley deliveries. No account has been taken of the transport movements from the recently approved Ashton Keynes quarry, Kings Meadow, or The Steadings. Before this application can properly be considered, a full Transport Assessment meeting the requirements of WDC 11 — including cumulative and cross-boundary impacts — must be undertaken. Conflict with WDC 11 is clear and was not addressed in the Officer's April report.
Wiltshire Core Strategy (January 2015)	



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CP 1 & 2 Settlement Strategy	Presumes against development outside settlement limits unless community-led. This commercial promoter's proposal runs directly contrary to community wishes — about 1900 objections lodged.
CP 34 Rural Employment	Requires expressed local need and a functional connection to the local agricultural economy. Feedstock is sourced from up to 80 miles away; energy is exported to a distant grid; only 4–5 permanent jobs are created against 1,000+ employed in the local leisure economy. No alternative site assessment has been submitted. There is no evidence of any systematic site search — the applicant has not assessed a single alternative location, including the large farms supplying the feedstock. This site appears to have been chosen as an accident of land ownership, not as the outcome of any locational justification process. This facility would demonstrably damage — not serve — the local economy.
CP 50 Biodiversity	Strategic Objective 5 requires development to be directed away from sensitive natural assets. This proposal does the opposite: it proposes industrial infrastructure immediately adjacent to a nationally designated SSSI, with a confirmed pollution pathway to the marl lake network and no credible ecological buffer on the SSSI-facing boundary. All proposed biodiversity enhancements are sited on the north and northwest boundary — the opposite side from the SSSI. Biodiversity impacts via the groundwater pathway remain entirely unassessed.
CP51 Landscape	Requires development to protect and enhance landscape character. Wiltshire Council's own Senior Landscape Officer has reviewed all three successive LVIA's submitted by the applicant and recommends refusal on each occasion — a consistent and unambiguous professional position maintained throughout the application's lifetime. His findings are significant: the LVIA systematically understates the value and sensitivity of landscape and visual receptors, producing significance scores he judges to be not credible; the elevated, panoramic views from Public Footpath AKEY4 are assessed at the same value as transient roadside views — a clear methodological error; construction-phase effects on the topography receptor are rated Major Adverse Significant even on the applicant's own methodology; and landscape restoration after 25 years is not credibly demonstrated, with no soil storage area identified and no binding mechanism to guarantee reinstatement. The Officer's recommendation carries substantial weight and must be given serious consideration by the Committee.



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CP 54 Cotswold Water Park (Policy Context)	CP54 is a permissive development-management policy whose seven criteria set the conditions under which recreation and leisure proposals in the Cotswold Water Park will be supported. It is not the lead breach policy for this waste facility — that role falls to WDC 4 above. However, CP54 remains a significant material consideration: it is the development plan’s formal recognition that the CWP is a protected green-infrastructure and recreation asset that Wiltshire’s spatial strategy is committed to sustaining. The supporting text at paragraphs 6.107–6.112 sets out an ambition for this landscape to become exemplary in its sustainability, establishing what the area is and why the harms arising under CP51, CP52, CP34, CP50, CP68, and WDC 4 matter. The site falls within the CWP Designated Boundary (confirmed March 2009), giving this contextual use of CP54 its full weight.
CP 57 Ensuring High Quality Design and Place Shaping	Requires all development to achieve a high standard of design that protects and enhances the amenity of existing and future occupiers, including from noise, odour, and visual intrusion. The applicant’s own BS 4142:2014 noise modelling records a +11 dB night-time exceedance at the nearest occupied receptor (King’s Water) and a +8 dB exceedance at Downs Cottage — levels BS 4142 classifies as likely significant adverse impacts. These substantially exceed the Wiltshire Environmental Health Officer’s stated acceptable threshold of within 5 dB of background, with no mitigation proposed to close the gap. An independent technical review (Comment WC-25-11-354933) identifies twelve systematic methodology failures in the applicant’s Appendix D Noise Assessment, each of which suppresses the predicted impact level: the baseline data is three years out of date; invalid weather-condition data has not been excluded; no objective tonal analysis has been conducted despite inherently tonal plant (CHP, compressors, blowers); internal attenuation assumptions are unsupported; and model uncertainty is materially understated. The nearest occupied receptors at King’s Water are excluded from both the Noise and Air Quality assessments despite a formal request for their inclusion lodged in November 2024 that remains unaddressed. A 25-year industrial operation at this scale, generating up to 160 HGV and tractor movements per day on lanes through a quiet rural landscape, cannot be reconciled with CP57’s requirement to protect residential amenity and maintain the quality of place. The site layout is of a poor design with the vehicular access at the lowest point of the site making the site bund ineffective in controlling any liquid pollution. The proposal to deploy sandbags to contain pollutants and to stop them entering the



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	adjacent drainage ditch and onto the SSSI does not meet the Best Available Technology requirement.
CP 60 Sustainable Transport	Requires development to be located and designed to reduce the need to travel and to minimise transport impacts. The proposal does the opposite: feedstock is drawn from up to 80 miles away, biomethane is tankered approximately 45 miles to an undisclosed location, possibly Banbury, and the facility generates around 25,000 HGV and tractor movements per year for the full 25-year consent — up to 160 movements per day at peak harvest on minor rural lanes. The claimed carbon benefit is undermined by the transport pattern the development depends upon. No account has been taken of pedestrians, cyclists or equestrian users of the road network.
CP 61 Transport and Development	Requires that development does not generate an unacceptable impact on highway safety and that the supporting transport assessment is robust. A formal highway-engineering objection (Comment WC-26-05-373448) concludes the Transport Statement is unsound on multiple technical grounds: it was surveyed entirely outside the peak harvest season; it omits 26 recorded collisions — including 8 serious and 1 fatal — on its own primary HGV route; it undercounts peak daily movements by approximately 50% by scheduling digestate spreading as a year-round even flow incompatible with NVZ closed-period rules; and it does not assess the minor rural roads on which over 6,000 digestate loads per year would terminate. The carriageway relied upon is only 6m wide against the



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	DMRB requirement of 9.3m, with visibility splays that are Departures from Standards.
CP 68 Groundwater	Requires a Groundwater Risk Assessment for development in a Source Protection Zone. The applicant has not submitted this assessment. Application is materially incomplete on its own characterisation of policy.
Ashton Keynes Neighbourhood Plan NDP	
(May 2017 · 91.5% referendum support)	
ENP3 Landscape & Tranquillity	Requires protection of landscape character and tranquillity. 25,000 heavy vehicle movements per year for 25 years is incompatible with this policy.
ENP1 Biodiversity	Requires minimisation of biodiversity impacts. The Cotswold Water Park SSSI is immediately adjacent. Biodiversity impacts via the groundwater pathway remain unassessed.
INP1 Flood Risk & SuDS NDP	Requires sustainable drainage. November 2024 revised plans removed SuDS — a direct and unambiguous conflict.
Wiltshire and Swindon Local Nature Recovery Strategy	
Environment Act 2021	



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LNRS Wiltshire & Swindon Local Nature Recovery Strategy (formally adopted October 2025)	The LNRS is a statutory document under s.105 of the Environment Act 2021, formally adopted by Wiltshire Council at Full Council on 21 October 2025. It designates the Cotswold Water Park as a priority area for habitat conservation and restoration, mapping the marl lake network as a key ecological asset requiring protection. The LNRS explicitly identifies clean water and nutrient management as conditions for nature recovery in this landscape. Locating 16,000 m³ of digestate lagoon storage within 1 km of the SSSI lake network — on a hillside with a confirmed groundwater pathway to those lakes — directly conflicts with the LNRS objective of protecting and enhancing priority habitats. In his foreword to the strategy, Cllr Ian Thorn, Leader of Wiltshire Council, wrote: "nature recovery is not a luxury — it is a necessity." The application has not been assessed against the LNRS, and no LNRS compliance statement has been submitted. Public bodies are under a statutory duty to have regard to the LNRS in carrying out their functions; the Committee is bound to consider it.
The Conservation of Habitats and Species Regulations 2017 (SI 2017/1012)	Given the Development's proximity to Designated Sites, a Stage 1 Screening Assessment should have been undertaken for this application. The North Meadow and Clattinger Farm SAC is ~3km away. This is well within the Zone of Influence for the development, in particular potential impacts from air emissions and emissions to surface water(s) and groundwater. As such a Stage 1 Screening Assessment (and any resulting Appropriate Assessment, if required) should be undertaken before any determination on this application should be made by the Determining Authority. Without this, any decision could be considered unlawful.



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Appendix B - Recommended Conditions

Should the application be granted, we respectively request the following conditions are attached:

- 1) No construction or demolition should take place on Sundays or Public Holidays, or outside the hours of 08:00-18:00 Monday to Friday and 08:00-13:00 on Saturdays.

Reason: Core policy 57, Ensuring high design and place shaping such that appropriate levels of amenity are achievable.

- 2) No development shall commence on site until a scheme of Ultra Low Energy Vehicle infrastructure has been submitted to the LPA. The scheme *must be approved by the LPA, and thereafter permanently retained.*

Reason: Core Policy 55; Development proposals, which by virtue of their scale, nature or location are likely to exacerbate existing areas of poor air quality, will need to demonstrate that measures can be taken to effectively mitigate emission levels in order to protect public health, environmental quality and amenity.

- 3) The development shall not commence until a Construction and Environmental Management Plan (CEMP) has been submitted to and approved in writing by the local planning authority. The CEMP shall include details of the following relevant measures:
 - i. An introduction consisting of construction phase environmental management plan, definitions and abbreviations and project description and location;
 - ii. A description of management responsibilities;



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- iii. A description of the construction programme;
- iv. Site working hours and a named person for residents to contact;
- v. Detailed Site logistics arrangements;
- vi. Details regarding parking, deliveries, and storage;
- vii. Details regarding dust and noise mitigation;
- viii. Details of the hours of works and other measures to mitigate the impact of construction on the amenity of the area and safety of the highway network; and
- ix. Communication procedures with the LPA and local community regarding key construction issues – newsletters, fliers etc.

There shall be no burning undertaken on site at any time.

Construction hours shall be limited to 0800 to 1800 hrs Monday to Friday, 0800 to 1300 hrs Saturday and no working on Sundays or Bank Holidays.

Reason: Core policy 57, Ensuring high design and place shaping such that appropriate levels of amenity are achievable.

- 4) No development shall commence on site until a Low Emission Travel Plan has been submitted to and approved in writing by the Local Planning Authority.

Reason: Core policy 57, Ensuring high design and place shaping such that appropriate levels of amenity are achievable.

- 5) A requirement that chicken waste is to be sourced only from within a certain radius to the Anaerobic Digester site (within 20 mile radius).



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Evidence of chicken and animal waste deliveries, including details of the source(s) of all material to the facilities to be recorded and monitored.

- 6) A limit to be imposed for the amount of chicken waste and other animal waste to be brought in/processed per year/month, in accordance with the applicant's application proposal.
- 7) No operations to commence until suitable and adequate digestate storage and disposal facilities are in place, including a comprehensive digestate management plan. This is to be submitted to and approved by the LPA prior to the facility commencing operations.
- 8) No development should commence on site until a decommissioning Bond is in place, to ensure future decommissioning is financed, regardless of the company's organisational structure or ownership at the time when operations cease.
- 9) No development should commence on site until a suitable and adequate pollution incident and management plan has been submitted and approved by the LPA for both construction and operation of the facility. This should include arrangements for emergency scenarios, management of firewater run-off, accidental spillages on and off site, and pollution mitigation/management in the event of accidental or uncontrolled release of polluting substances to surface waters and groundwater.
- 10) A requirement for regular effluent, groundwater and surface water monitoring and reporting. To include receiving water bodies of run off and effluent discharges from the site.
- 11) No development and operation should commence until a suitable traffic management plan is submitted to and approved by the LPA - to include a requirement for traffic/delivery routes of all vehicles to exclude



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travelling through local villages, specifically South Cerney, Ashton Keynes, Somerford Keynes (all of which have vehicle weight restrictions in place), even in cases of nearby road closures or roadworks.

- 12) A requirement for cleaning spillages from lorries/HGVs/Tractors on roads (to be undertaken within certain time limits and reported to the relevant authorities).
- 13) Vehicle washing requirements
- 14) No Development should commence until a Biodiversity Management Plan has been submitted to, and approved by, the LPA. This should include a plan for implementation and management of the Biodiversity Net Gain measures and commitments, as outlined in the Biodiversity Net Gain Assessment document (dated 26th April 2023) by the Applicant.