Regulation 25 Environmental Statement Addendum

Spring Grove AD Facility, Thurlow

Acorn Bioenergy Limited

Prepared by:

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01	30 April 2024	Sabrina Burrows	Rhian Thomas	Rhian Thomas
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04				

Basis of Report

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Appendices

1.0 Introduction

1.1 Purpose of the Environmental Statement Addendum

SLR Consulting LTD (SLR) have been instructed by Acorn Bioenergy Limited (the Applicant) to produce an Environmental Impact Assessment (EIA) Environmental Statement (ES) Addendum to provide clarify on multidisciplinary aspects of the below proposal:

> *'Construction and operation of an anaerobic digestion facility, associated infrastructure and new access road, connecting pipeline and covered digestate lagoons.'* (Application Ref: SCC/0045/23SE)

Following discussions with the case officer post validation of the planning application in September 2023, SCC notified of their intention to issue a request for additional information to satisfy the requirements of Regulation 18 (2) and (3) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) to supplement the submitted Environmental Statement. This request was received on 21 November 2023.

The purpose of a Regulation 25 Request is for further information to be provided by an Applicant, without which the ES cannot be properly considered. In this sense, further information required through a Regulation 25 Request should focus on assessment of *likely significant effects* of the Proposed Development (as opposed to more minor points of clarification) and a key part of the process is confirmation of whether (and how) the further information provided in response to a Regulation 25 Request has altered any of the predicted likely significant effects set out in the ES.

Accordingly, the purpose of this Addendum is to clarify matters that solely relate to the ES, providing reasoned responses to conclusion on any changes to the significant effects of the proposed development on the environment. This Addendum should be read alongside the submitted planning application documentation, including the submitted Environmental Statement (ES) unless otherwise stated.

1.2 ES Addendum Scope

This ES Addendum thematically address each of the consultation responses contained within SCC's Regulation 25 Request (replicated here as Appendix A of this Addendum for ease), ensuring full consideration of each response is undertaken and clarified where necessary. A revised Non-Technical Summary is attached at Appendix B.

Responses made by consultees within the request are addressed by providing clarifications and additional details or by conducting further assessments/technical reports where appropriate. The significance of such findings are then concluded alongside an clear overview of any updates made to the ES.

The topics addressed, as per the request, are as follows including the associated consultants with each topic:

- Surface Water Drainage *(SLR Consulting; GGP);*
- Highways *(Motion);*
- Natural Environment *(SLR Consulting; Earthcare Technical);*
- Air Quality *(SLR Consulting);*
- Ecology *(SLR Consulting);*
- Landscape and Visual Impact *(Peter Radmall Associates (PRA));*

- Arboriculture *(CBA Trees on behalf of SLR Consulting)*
- Lands Contamination *(SLR Consulting);*
- Statement of Community Involvement *(Instinctif Partners);*
- Site Selection *(SLR Consulting);*
- Waste Availability *(Acorn Bioenergy);*
- Cumulative Impacts *(SLR Consulting; Motion); and*
- Risk of Accidents *(Acorn Bioenergy).*

1.3 EIA Addendum Format

This Addendum follows the format of the SCC Regulation 25 Request for ease. Please note, however, that the numbering of each section is not necessarily the same as each chapter heading, rather the relevant Request topic, consultee and point is provided in the table.

The Addendum summaries how each of the above consultation points raised with regard to the above topics has been addressed, and the implications for the EIA. This comprises an overview of updates made to the ES and any changes to the significance of effects.

This addendum is also accompanied by several technical appendices which provide further clarify on matters raised in the EIA addendum, as follows. The relevant authors are listed below:

- Appendix A: SCC Regulation 25 Request
- Appendix B: Revised Non-Technical Summary (SLR Consulting)
- Appendix C: Response to LLFA Technical Memorandum (SLR Consulting)
- Appendix D: Thurlow Flood Risk Sequential Test (SLR Consulting)
- Appendix E: Response to the Environment Agency (SLR Consulting)
- Appendix F: Response to the Environment Agency (GGP Consult)
- Appendix G: Transport Addendum (Motion)
- Appendix H: Revised Planning Design & Access Statement (SLR Consulting)
- Appendix I: Natural England Response Technical Note (SLR Consulting)
- Appendix J: In-combination Ammonia Impact Assessment (Earthcare Technical)
- Appendix K: Nutrient Management Plan (Earthcare Technical)
- Appendix L: Carbon Calculator (Acorn Bioenergy)
- Appendix M: Carbon Lifecycle Assessment (Brown & Co)
- Appendix N: Riparian Mammals Survey Results (SLR Consulting)
- Appendix O: Revised Spring Grove Statutory Biodiversity Metric (SLR Consulting)
- Appendix P: Revised Landscape (Fencing) Drawings (GGP Consult)
- Appendix Q: Phase 2 Ground Investigation Report (SLR Consulting)
- Appendix R: Revised Statement of Community Involvement (Instinctif Partners)
- Appendix S: Feedstock (Waste Availability) Response (Acorn Bioenergy)
- Appendix T: Noise Addendum Report (Cumulative Impacts) (SLR Consulting)

- Appendix U: Air Quality Response (SLR Consulting)
- Appendix V: Environmental Permit Statement (Acorn Bioenergy)

1.4 Statement of Competency

The ES 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), as outlined in the submitted ES. 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.

Others have been involved in the preparation of the ES Addendum.

The traffic and transport addendum is authored by Mr John Russell. Mr Russell is a Chartered Transport Planner, being a Chartered Member of the Institute of Logistics and Transport (CMILT) and a Member of the Chartered Institution of Highways and Transportation (MCIHT). He holds an Honours Degree in Civil Engineering. Mr Russell is a Director of Motion Limited a consultancy that specialises in transport planning, traffic engineering and highway design and has worked in the traffic engineering and transportation planning for over 35 years. From 1995 onwards Mr Russell has been responsible for assessing the environmental impacts of road traffic arising from over 20 projects.

Peter Radmell undertook a peer review of the LVIA and Environmental Statement (ES). Peter Radmell is an independent landscape practitioner, working under the name Peter Radmell Associates and has an MA (Geography), and B.Phil (Landscape Design). Peter is a landscape and environmental planner with c40 years experience, mainly in a consulting capacity and latterly in landscape planning and EIA.

2.0 Surface Water Drainage

Surface Water Drainage

1. Response to LLFA & West Suffolk Council Planning

On the 4th January 2024, a design team meeting was held between the following attendees:

- Water drainage engineer from SCC;
- SLR Consulting;
- GGP; and
- Acorn Bioenergy Ltd.

Within the meeting, each information request (made by the LLFA and SCC) was discussed, with subsequent approach agreed (to each Reg25 request) with the representative from SCC (water drainage engineer). This is set out in the technical memorandum attached at Appendix C that summarises the scope and actions that were agreed.

Additionally, as requested/discussed in the meeting, to aid understanding of the site context and its surrounding, Appendix 2 of the Technical Memorandum appended to Appendix C of this document contains a gallery of relevant photographs taken during a site visit undertaken by SLR in May 2022.

A brief description of the photographs is provided below.

- The visit occurred a week or so after the infiltration testing and, as such the reinstated trial pit is clearly seen in the foreground of Photo 1.
- The general site topography slopes gently to the north as can be seen in Photos 1, 2 & 6.
- Photo 3 shows the access route through from Spring Grove Farm, which passes through a 5m high embankment of a dismantled railway (within dense tree cover).

Photos 4 & 5 the small watercourse to the south of the site, together with an existing access bridge from Spring Grove Farm. The existing pipe culvert is in poor condition.

The following headers present each of the requested information raised in the Reg25 request with respect to flood risk and surface water drainage.

a) Submit a surface water drainage strategy that achieves the 4 pillars of SuDS and utilises above ground SuDS wherever possible for collection, conveyance, storage, and discharge, providing multi-functional and benefits.

b) An updated drainage layout which shows the use of rain gardens and permeable paving within the development is required.

The 4 pillars of SuDS (sustainable drainage systems) have been considered in the originally submitted Flood Risk Assessment (FRA) and Surface Water Drainage Scheme (SWDS), dated August 2023. However, due to the likelihood of contamination from the hardstanding and other open areas of the site, it is proposed that SuDS source control and conveyance features are not adopted on the site.

Instead, it is proposed that channel drains and underground pipes be used to intercept and convey runoff across the site. A 'Site Control' feature in the form of a lagoon is considered to be a viable option in terms of the management of water quantity and was integrated into the SWDS.

To control the quality of surface water runoff, a full retention interceptor & catchpit will be adopted to mitigate runoff contaminants. Additionally, the proposed AD plant will operate under an

Surface Water Drainage

1. Response to LLFA & West Suffolk Council Planning

Environmental Permit, with a strict operational & maintenance procedure in place. These procedures are developed to ensure compliance and protection of the local receptors.

Further safeguarding measures against contaminated discharge into the environment will be implemented under the permit. For example, water quality checks will be required on the outfall locations, covering criteria such as TSS, PH, volume & hydrocarbons. These will be recorded and submitted to the Environment Agency under the permit conditions annually or more frequently (pending permit conditions).

Therefore, although SUDs features have not been adopted, the proposed surface water drainage system shall conform and be regulated to a robust, audited & recorded operational & maintenance plan. This will ensure the performance of the drainage system is maintained throughout the life of the plant.

The proposed 'Conveyance' and 'Site Control' options are summarised in Table 10-2 within the FRA and SWDS and included below:

Management Train Mechanism	Application	Potential Suitable Features
Source Control	For the interception of surface water runoff at the source such as office roofs, parking lots and equipment hardstanding.	
Conveyance	To convey surface water runoff from 'Source Control' mechanisms to 'Site Control'.	• Channel drains • Underground pipes
Site Control	Provides the required surface water attenuation / storage prior to controlled discharge to the water environment.	• Lagoon

However, rainwater harvesting is proposed at the site. As per Section 9.1.1 in the submitted Flood Risk Assessment (August 2023), contaminated runoff, caused by silage residue, from the silage clamps and sections of hardstanding area will be collected through a series of drainage channels, pipes, and chambers and be brought into a below ground holding tank. From this tank, runoff will be pumped to three 400m³ holding tanks within the containment bund where it will be reused within the process. The process has a yearly demand of 62,000m³, equating to 2ls-1 continuous flow. This offers a sustainable drainage system, compliant with the hierarchy.

c) Detailed SuDS drawings need to be included within the drainage strategy i.e. cross and long sectional drawings. All features should be designed in accordance with Suffolk SuDS guidance.

d) A contour plan, exceedance routes and impermeable area drawings are required within the drainage strategy.

Surface Water Drainage

1. Response to LLFA & West Suffolk Council Planning

As discussed in the meeting, the detailed SuDS drawings for the proposed development are included within Appendix 1 of the Technical Memorandum (Response to LLFA and SCC) which is appended to this document at Appendix C and are as follows:

- GGP-29351-P-105-C Drainage Plan;
- GGP-29351-P-121-C Proposed Lagoon Details;
- GGP-29351-P-105a-C-Drainage Catchment Plan.

Proposed Site levels are shown in drawing GGP-29351-P-110-F-Site Levels-Sheet 1 of 2 and 2 of 2.

Drawing No. GGP-29351-P-105a-C shows the proposed impermeable areas.

Drawing SW2: Surface Water Drainage Strategy includes exceedance routes. This is shown in Appendix C (Response to LLFA Technical Memorandum).

These drawings have been discussed in the meeting and are attached to the Technical Memorandum.

e) Remove the calculations with the discharge rates and climate changes which are not being used.

Following the meeting, the calculations were not removed from the FRA & SWDS. Instead these calculations, as presented in Appendices 5 and 6 of Appendix C of this Addendum are as follows:

- *Appendix 5:* Contains details the calculations for the dirty water usage drainage assessment, this establishes the storage requirements associated with the function of the proposed anaerobic digestion plant and details how the surface water from the site will be managed.
- *Appendix 6:* Includes calculations detailing the attenuation volume for the clean water lagoon, required for the proposed development in response to a range of AEP rainfall events.

f) The calculations need to be modelled as a network rather than a source control.

As discussed in the meeting, MicroDrainage network model simulation calculations are technically challenging to model due to the 12-hour delayed outflow due to the manual testing and accreditation procedure that is to be adopted as part of the approved Environmental Permit process. Simulation is not possible with a non-standard rainfall profile.

Accordingly, MicroDrainage Source Control calculations have been supplied that describe the cascade model – the process for the ‘clean water’ system that allows clean water from the sufficiently sized bunded area, that has been tested as clean, to be allowed into the swale. The bund has sufficient capacity (using 2x 50 m^3 tanks, 3x 400m^3 tanks, 5x 1,500 m^3 tanks and a 7,400 m^3 bund) to store water for the potential 12-hour overnight period between shifts, so that any dirty water with value, can then be returned to the process. As stated, the process demand is significant requiring significant amounts of harvested rainfall.

g) A sequential test is required.

A Flood Risk Sequential Test has been prepared, a copy of which is located within Appendix D.

The purpose of the Sequential Test is to steer new development to areas with the lowest probability of flooding. An Area of Search was set at a 5km radius around the site due to the need for the

Surface Water Drainage

1. Response to LLFA & West Suffolk Council Planning

development to be located close to the donor feedstock farms. The proposed development site will accept 92,000 tonnes per annum of feedstock from local farms.

A review of the following information sources was undertaken to identify available, alternative sites in Flood Zone 1, that would be appropriate for the proposed development. This search included Development Plan allocations, Brownfield Registers and a review of other sites considered by the Applicant.

The staged approach set out within the Sequential Test has adequately demonstrated that there are no reasonably available and appropriate sites for the proposed development with a lower probability of flooding that would be appropriate for the type of development proposed.

Nonetheless, recent guidance issued by the Environment Agency (Summer 2024) has indicated that a sequential test may not be necessary '*if development can be laid out so that only elements such as public open space, biodiversity and amenity areas are in areas at risk of any source of current or future flooding*'. This was further bolstered by paragraph 175 of the National Planning Policy Framework (December 2024) which states *'the sequential test should be used in areas known to be at risk now or in the future from any form of flooding, except in situations where a site-specific flood risk assessment demonstrates that no built development within the site boundary, including access or escape routes, land raising or other potentially vulnerable elements, would be located on an area that would be at risk of flooding from any source, now and in the future (having regard to potential changes in flood risk)'.* As per the proposed layout, no proposed built areas lie within the defined flood zone, only landscaping and planting areas. As such, no sequential test is required to comply with currently EA planning guidance, however is included given that the request contained within the LPA's Regulation 25 request.

Surface Water Drainage

2. Response to Environment Agency

With respect to points a) and b) of Topic 2 (Surface Water Drainage) within the Regulation 25 Request, a virtual meeting was held on the 13th November 2023 with the following attendees to agree approach the to satisfy the information request:

- Environmental Agency;
- SCC;
- SLR Consulting;
- GGP; and
- Acorn Bioenergy Ltd.

The following headers present the approach agreed during the meeting concerning to points a) and b), which is also summarised in Appendix E.

a) Identification of the impacts from nearby watercourses is required

The FRA submitted with the planning application (August 2023) assessed the flood risk at the development site. The FRA stated the anticipated impact from the nearby watercourses and can be summarised as follows:

The Stour Brook flows in a general easterly direction along most of the southern boundary of the main Site. There is also a watercourse along the western boundary of the main Site and another delimiting the Bowsey Field and the Spring Grove Field. The two watercourses, along the western boundary of the main Site and delimiting the Bowsey Field and the Spring Grove Field, appear to drain to the Stour Brook.

A hydraulic model (a dynamically linked 1D-2D ESTRY-TUFLOW model (build 2020-10-AD-iSP-w64)) was constructed that extended approximately 250m upstream of the site and 350m downstream. A review of the model output confirmed that this extent captures the area of influence of the Site on flood risk. That is, any changes in flood risk (Figures 8-2 of the FRA) are contained well within the extent of the model for the Design Flood Event (DFE) i.e. the 1% AEP flood event inclusive of an allowance for climate change (8%). [Correspondence on 27th November 2024 to the EA has confirmed that all model parameters are deemed acceptable by the EA.]

Flood management measures in the form of flood culverts will be provided. During a DFE, these measures result in a reduction in flood risk downstream of the main site. However, there is a limited area within the woodland to the south west of the main site where flood risk is marginally increased. This increase in flood risk is however considered appropriate in light of the low vulnerability use of the woodland and the decrease in flood risk at Haverhill.

The modelling report, contained and summarized within the FRA confirmed that all impacts of the development had been investigated and successfully mitigated and incorporated into the scheme proposals presented as part of the planning submission.

b) Assessment of the impact of climate change using appropriate climate change allowances is required.

Section 3 of the letter issued to the Environmental Agency (Appendix E) provides clarification on climate change allowances associated with the Proposed Development. The section explains that the development lifetime of the project is 25 years which is considered in Table 7-1 of the FRA, with

Surface Water Drainage **2. Response to Environment Agency**
an 8% climate change allowance adopted. The letter further outlines that the Environmental Agency accepts that the allowance provided within Table 7-1 of the FRA are correct.
c) Confirmation of the lagoon lining depth is required. **d) Confirmation to whether lagoon leak detectors is required.** **e) Confirmation on the monitoring of the rising main to identify leaks is required.** **f) Confirmation on how contamination of clean water will be prevented, specifically in relation to the onsite clamps.** **g) Confirmation on the contingency plan in the event of pumping station failure or mains power failure, resulting in dirty water not being pumped into holding tanks.** **h) Confirmation how the pump located within the tank bund will be managed.** **i) Consideration of the installation of a penstock on the outlet of the rainwater lagoon to isolate the site drainage in the event of a spillage or run off due to a fire.**
Please see the attached letter from GGP dated 18 December 2024 in response to the above, contained at Appendix F.

3.0 Highways

Highways **3. Response to Cambridgeshire County Council Transport Assessment Team & Highways Development Control**
a) Data from Cambridgeshire County Council's accident data portal needs to be included within the transport assessment.
This is considered in Paragraphs 7.2-7.7 of the Transport Addendum (Appendix G) which reviews accident data. No significant patterns or trends have been observed that would be exacerbated by the Proposed Development (the Proposed Development would change the volume of traffic by less than 1%).
b) Full trip generation assessment is required
This is considered in Paragraphs 2.8-2.16 of the Transport Addendum (Appendix G) which concludes that a traditional TRICS assessment is not possible due to lack of similar surveyed sites. Therefore, a first principles approach has been applied based on the processing and export volumes that are expected to be achieved.
c) Outline the daily AM and PM peak generation figures for the busiest period (e.g. the harvest period). Include trip generation from employees.
This has been calculated with the Transport Addendum (Appendix G) and outlined on Paragraphs 2.8.2.16 of the document. The anticipated number of development-related peak hourly trips is equivalent to circa. 0.8-0.9% of traffic during the peak periods. This would have an imperceptible impact on the operation of the local highway network
d) Details of the distribution of trips to and from the site to understand the levels of trips on the A1307 within Cambridgeshire
Expected AD suppliers (local farmers) currently generate a number of vehicle trips of which, a proportion of which these existing trips would involve the disposal of agricultural products and waste which would be redirected to the AD plant. Therefore, these movements would already exist on the local highway network, of which, depending upon the locations of the farms and end destinations, would already be using the A1307. This will cause a change in traffic volumes on the approaches to and at the site access and the impacts of this is assessed within Section 4 of the Transport Addendum (Appendix G).

Highways **4. Response to Suffolk County Council (Highways)**
a) Clarification is sought to the calculation of how 5600 trips of the proposed 9786 trips are existing.
This is considered in Paragraphs 2.2-2.3 of the Transport Addendum (Appendix G) which states determining these existing proportions of traffic already using the A1307 at this stage is difficult to predict accurately. However, in order to provide a particularly robust assessment, the junction capacity assessment of the proposed site access (detailed in Section 4) has not accounted for any 'netting off' of vehicle trips, – i.e. the assumption is of all trips being new notwithstanding, it is important to recognise the relationship between the proposed development and the existing vehicular trips on the local highway network.
b) Include non-HGV movements within the calculation of the construction traffic movements.
This is considered in Paragraphs 2.4-2.7 of the Transport Addendum (Appendix G) which states the number of daily construction trips (all vehicle types) equates to 0.4% of the total daily traffic flow along the A1307. This is considered to be negligible and would have an imperceptible impact on the operation of the local highway network, noting that the construction period will be temporary.
c) Demonstrate how the proposed gas flare will not distract users of the highway when in operation
This is considered in Paragraph 7.1 of the Transport Addendum (Appendix G) which discusses gas firing. The proposed flare location is circa. 220m from the highway; considering this distance combined with existing buildings and vegetation, it is unlikely the flare will have an impact.
d) Further information to evidence that the proposed number of operational trips will not detrimentally affect the highway is required.
This is considered in Paragraphs 4.1-4.7 of the Transport Addendum (Appendix G) which discusses a junction assessment that has been undertaken. It is concluded that the proposed access arrangement design will have a negligible impact on the operation of the local highway network.
e) Assessment of queue length for vehicles waiting to turn right into the site with consideration of highways safety is required.
This is considered in Paragraphs 3.1-3.6 of the Transport Addendum (Appendix G), which makes reference to the junction modelling undertaken in Section 4. It is concluded that queue lengths for vehicles waiting to turn right into the site would be less than 1 vehicle during the peak periods based on a peak development assessment. The delay to vehicles seeking to turn right would be minimal. On the basis that the junction modelling identifies there is no capacity constraint, that would have a significant impact upon highway safety.

Highways 4. Response to Suffolk County Council (Highways)
f) Investigation into the appropriateness of a right turn lane into the site is required.
This is considered in Paragraphs 3.1-3.6 of the Transport Addendum (Appendix G), which makes reference to the junction modelling undertaken in Section 4. It is considered unnecessary for a ghost right turn lane to be provided, on the basis that the junction modelling identifies there is no capacity constraint. Therefore, the not providing a right turn lane is acceptable.
g) Modelling of peak traffic flows is required.
Junction capacity modelling has been undertaken for the site access. This is based on the peak trip generation presented in the TAR and the ATC data. The modelling demonstrates that the site access will operate well within capacity during the future scenario 2029 as identified by low RFC values and queues during the AM and PM peaks. The junction modelling identifies that there will be less than 1 vehicle queuing to turn right into the site access and therefore the proposed access arrangement design will have a negligible impact on the operation of the local highway network.
h) Clarification on the space provided for parking, waiting and manoeuvring areas is required.
This is considered in Paragraphs 5.2-5.4 of the Transport Addendum (Appendix G) which discusses the internal layout of the site. Given a maximum of 5 staff will be on-site at any one time and therefore there will be sufficient parking provision. The application site will also be managed such that the number of vehicles at any one time does not exceed the number of trailer bays.
i) Track plans, specifically for HGV and tractor movements within the site is required.
This is considered in Paragraph 5.5 of the Transport Addendum (Appendix G) which discusses the internal layout of the site and refers to swept path analysis which has been undertaken (Appendix C of the Transport Addendum). The analysis indicates the largest expected to require access to the Application Site, can readily access, egress and turn within the Application Site without excessive manoeuvring or safety concerns.
j) Formal pedestrian and cycle crossing of the proposed access junction is required as the improved junction cross existing segregated pedestrian and cycleway.
This is considered in Paragraph 3.7 of the Transport Addendum (Appendix G) which discusses access to the Site. A revised access design has been developed, which has given consideration to its interaction with the cycleway and is contained within Appendix A of the Transport Addendum.
k) The stage 1 safety audit has not addressed the risk of queueing on the carriageway.
This is considered in Paragraph 6.2-6.3 of the Transport Addendum (Appendix G) which discusses road safety. The information provide within sections 3.0 (access appraisal), 4.0 (junction assessment) and 5.0 (internal layout) comprehensively addresses the potential for queueing and

Highways 4. Response to Suffolk County Council (Highways)
implications for highway safety for which the Highway Authority can conclude there is neither a risk of queueing or associated risks for users of the carriageway.

Highways **5. Response to Suffolk County Council (Planning)**
a) Clarification of this applications interaction with application DC/23/0572/FUL for an agricultural access improvement at Silver Street.
As previously discussed between the applicant and case officer the proposed AD facility subject of this planning application and EIA has no relationship with the above mentioned planning application for an agricultural access improvement off Silver Street.
b) Removal of reference to A43 within Planning Statement.
Reference to A43, a minor error previously contained in Section 3.2.1.1 of the Planning Design & Access Statement has been corrected. A revised Planning Design & Access Statement is contained as Appendix H and replaces the previously submitted version.
c) Justification for including a hard standing 'dog leg' towards the gap in hedgerow to access the field to the north. This seems to imply vehicles will be travelling between the main site and field to the north.
Access will continue to be provided to the field to the north to enable the harvest to be transported directly to the main AD site, avoiding having to be transported along a longer route via roads to minimise trips on the public highway.

4.0 Natural Environment

Natural Environment **6. Response to Natural England**
a) Robust scientific evidence that supports the assumptions within the air quality assessment.
Please refer to SLR Technical Note 'Natural England Response' at Appendix I which outlines the approach undertaken. The assessment has been undertaken in reference to extensive scientific research undertaken by the European Environment Agency, published in the form of the Emission Inventory Guidebook (specifically section 5.B.2). The assessment has been undertaken in application of the Aermod dispersion model, a predictive tool which is routinely utilised and accepted by the EA on other applications. As such, the air quality assessment is both 'robust' and 'scientifically evidenced'.
b) The air quality assessment must include in combination effects with other plans and projects.
Please see report by Earthcare (March 2024) in Appendix J. This has been prepared in response to the requested information from Natural England and includes description of the process to identify in-combination sites within its Sections 4.2 and 4.3; assessment of in-combination effects with other plans and projects is provided within Section 5.2 of the Earthcare report.
c) Assessment of air quality impacts on Over and Lawn Woods Site of Special Scientific Interest (SSSI) in combination with other plans and projects.
Section 5.2 of the Earthcare report (March 2024) confirms that for the Proposed AD Plant in-combination, the process contributions as a percentage of the critical levels (CLe) and critical loads (CLos) do not exceed 1% at Over and Lawn Woods SSSI.
d) Clarification to whether ammonia sources and associated ammonia emission rate includes emissions from the silage feedstocks stored prior to the AD process.
Please see response [A]1 within the SLR Technical Note 'Natural England Response' in Appendix I and text below: 'This references the EMEP/EEA air pollutant emission inventory guidebook '*5.B.2 Biological treatment of waste – anaerobic digestion at biogas'* which states that as the pH of silage is low for conservation purposes, ammonia emissions resulting from the storage of energy crops before anaerobic digestion are negligible. It has been clarified that silage feedstocks are stored within Clamp 1, 2 and 3, covered by weighed-down sheeting (comprising an oxygen barrier). This is not considered to be a significant source of ammonia'.
e) Detailed specification of the digestate lagoon covers is required.
Please see response [A] 2 (i) in the SLR Technical Note 'Natural England Response' in Appendix I and text below: 'For the benefit of transparency the applicant can confirm the abatement system will be industry standard such as supplied by https://enviroseal.co.uk/. As a result of the covered lagoon gas

Natural Environment 6. Response to Natural England
captured system potential ammonia emissions would be effectively controlled at source, leading to a ~100% reduction meaning the AQA assumptions are already conservative As the gas capture system will be a bespoke design, and the lead design contract has not yet been made, we request that the detail of the proposed gas capture system is requested via a planning condition, to be provided in due course. This would also form part of the Environmental Permit from the Environment Agency, with monitoring to ensure compliance'.
f) Robust scientific evidence is required to demonstrate that the 95% ammonia emission reduction rate is achievable.
Please see response [A] 2 (i) in the SLR Technical Note 'Natural England Response' in Appendix I and text below: 'Tomlinson (Ammonia emissions from UK non-agricultural sources in 2017: contribution to the National Atmospheric Emission Inventory, 2018) states; "*Post-AD storage incorporates an emission reduction factor of 95% (Cumby et al., 2005)"* This infers that the 95% emissions reduction factor can be applied to material resulting from the AD process, which is digestate, stored in a lagoon or tank. It also infers the NAEI have applied this factor to determine losses from lagoons. Irrespective of the interpretation of emissions reduction, the Applicant has adopted enhanced mitigation options to address these specific concerns and to demonstrate that the proposed development would not have a significant adverse impact at sites of ecological significance'.
g) Clarification is sought to whether it would be more appropriate to model the emission rate for the digestate lagoons on the maximum storage capacity or the anticipated peak volume stored over a 12-month period.
Please see response [A] 2 (i) in the SLR Technical Note 'Natural England Response' in Appendix I and text below: 'Regarding the lagoon capacity, the AQA has been undertaken assuming normal site operations, which is an appropriate approach for planning purposes. The volume of digestate stored within the lagoons would be variable across the year, with a peak volume of 20,000 tonnes anticipated to occur over a period of two months ((January and February) (in line with feedstock production / export cycles). The assessment has considered storage of the peak volume (20,000m^3) yearlong, reflecting a conservative approach. Whilst the lagoons have a capacity of up to 52,500m^3, this is for contingency purposes only, aligned to standard engineering design. Therefore, should a planning condition be sought regarding this, then would it not be more appropriate to consider the average lagoon capacity over the year, as opposed to setting a maximum'.
h) Robust scientific evidence and appropriate mitigation measures to justify an 80% ammonia reduction for digestate solids is required. **i) Robust scientific evidence is required in relation to the 80% ammonia emission reduction from digestate solids by passive ventilation.**
Please see response [A] (ii) in the SLR Technical Note 'Natural England Response' in Appendix I and text below: 'Misselbrook et al (Ammonia Mitigation User Manual, 2008) states "A rigid store cover has been shown to reduce emissions from slurry storage by 80%". Whilst this is stated in relation to storage of pig slurry, as opposed to digestate solids, both have a similar Nitrogen content and therefore in the

Natural Environment

6. Response to Natural England

context of NH_3 emissions pig slurry is considered a suitable surrogate for digestate. The digestate storage building proposed is a rigid metal structure operating under passive ventilation from a number of lurves. The aforementioned paper does not reference 'active' or 'drawn' ventilation methods for rigid store as referenced elsewhere in the document, therefore it is inferred that the 'rigid cover' considered is passive ventilated. As such, it can be considered that the likely reduction in ammonia emissions from a 'rigid store' (passively ventilated and containing slurry) would be the same as that achieved by the digestate storage building (a passively ventilated rigid metal structure containing digestate). As such, application of an 80% reduction in NH_3 emissions as a result of storing solid digestate in the enclosed and passively ventilated digestate storage building is considered appropriate'.

j) Robust scientific evidence to justify the ammonia emission rate achieved by the manure shed abatement unit is required.

k) Evidence of the performance criteria for the manure shed abatement unit is required.

Please see response [A] 2 (iii) in the SLR Technical Note 'Natural England Response' in Appendix I and text below:

'The planning application has omitted details of abatement supplier and design because information can be commercially sensitive. For the benefit of transparency, the applicant can confirm that an odour/NH_3 abatement stack system will be installed on the manure shed building. The abatement system will be industry standard such as supplied by https://centriair.com/case/.

The guaranteed performance criteria is provided as 0.25 ppm (0.177mg/Nm3).

The applicant would be happy to commit to this performance standard and is expecting that this would also form part of the Environmental Permit from the Environment Agency, with monitoring to ensure compliance. This approach is within the norms of good industry practice, and it is atypical to provide propriety information of abatement design at planning application stage when a performance standard is supplied'.

l) A nutrient management plan is required.

Please see the Nutrient Management Plan report by Earthcare (April 2024) at Appendix K.

Natural Environment

7. Response to Suffolk County Council (Planning) & Suffolk Wildlife Trust

a) A lifetime carbon impact assessment is required.

Appendix L provides the carbon calculation for the proposed development. The appendix provides further detail on the carbon dioxide equivalent (CO2e) emissions associated not only with the operational phase of the development as provided in the Planning Statement, which was calculated in line with the Renewable Energy Directive (RED I), but also provides values for the embodied emissions associated the pre-operational and post-operational phases of the development (i.e., areas that are out of the scope of the Renewable Energy Directive (RED I) methodology). Overall,

Natural Environment 7. Response to Suffolk County Council (Planning) & Suffolk Wildlife Trust
the appendix concludes that over a 25-year period the Proposed Development will deliver total 'Cradle-to-Grave' emissions savings of 764,835 tonnes of CO2e. Appendix M provides Brown & Co's assessment of the carbon intensity information and supporting evidence of the proposed development. It supports the conclusions made with the carbon assessment supporting the application and considers the carbon figures provided by the applicant are suitable and backed by strong and well justified evidence. There is a difference of 823tCO2eq between Brown & Co's figures and the assessment supporting the application. However, this is considered negligible when considering the significant carbon saving the project will provide over its proposed 25-year lifetime.

5.0 Air Quality

Air Quality

8. Response to Suffolk County Council Air Quality Consultants & West Suffolk EHO

a) Pre pandemic 2019 data is required to evaluate existing PM10 concentrations.

Section 4.2 of the Environmental Statement Ch 7 App 7.A Air Quality Assessment' (SLR Ref: 404.11923.00004 Phase 14 Version No: v1.7) dated May 2023 states "*Monitoring data collected prior to the COVID-19 pandemic (i.e. pre-2020) has been used to characterise the baseline environment, as pollutant concentrations monitored during 2020 and 2021 are expected to be atypical, and not representative of the local environment*".

Further, Section 4.2.4 and Table 7-12 of the ES Chapter provides the mapped background concentrations of PM_{10} in the site locale, based upon the 2018 base year Defra update and projected to 2022. This data has been calculated based on pre-pandemic information and is therefore considered to be representative of pre-pandemic conditions. Irrespective, amending the PM_{10} value from the Defra maps to 2019, from 2022 results in an increase of 0.4 µg/m^3 (from 16.4 µg/m^3 for 2022 to 16.8 µg/m^3 for 2019). This change does not make a material difference to the conclusions of the assessment, and it should further be noted that primary PM_{10} is not considered a significant emissions source from the Proposed Development.

b) Track needs to be considered up to 500m from the site entrance(s).

Section 5.1.1 of the Environmental Statement Ch 7 App 7.A Air Quality Assessment' (SLR Ref: 404.11923.00004 Phase 14 Version No: v1.7) dated May 2023 states *"there are no human receptors situated within 50m of the route used by construction vehicles on the public highway up to 200 m from the site entrance(s), an assessment of potential track out effects has been screened out."*

It is considered that this distance is appropriate based on the latest IAQM construction dust guidance (Version 2.2, January 2024) which states "*An assessment will normally be required where there is: a 'human receptor' within: - 250 m of the boundary of the site; and/or - 50 m of the route(s) used by construction vehicles on the public highway, up to 250 m from the site entrance(s)."*

Irrespective of this, assessing using the maximum 250m trackout distance (as per the latest IAQM dust guidance) would not change the conclusions of the assessment as there are also no additional human receptors situated within 50m of the route used by construction vehicles on the public highway up to 250 m from the site entrance(s).

c) The Institute of Air Quality Management guidance on the assessment of dust from demolition and construction has been updated in August 2023, however, the 2014 version has been used.

The Institute of Air Quality Management guidance on the assessment of dust from demolition and construction has undergone a period of retractions and reissue and the August 2023 issue of this guidance has since been withdrawn *"in light of a number of identified errors"* in this version. An updated version was published in January 2024 (Version 2.2) with several changes to screening criteria and consideration of some construction and demolition 'magnitude criteria' including a reduction in the track out distance from 500m to 250m (see point b above). The changes in the new guidance do not change aspects of magnitude related to the Proposed Development, nor the

Air Quality 8. Response to Suffolk County Council Air Quality Consultants & West Suffolk EHO
sensitivity of the surrounding receptors. The conclusions of the original assessment are therefore considered to remain valid in consideration of the latest issue of this most recent guidance.

6.0 Ecology

Ecology

9. Response to Suffolk County Council (Ecology), Suffolk Wildlife Trust & West Suffolk Council Ecology

a) Water Vole and Otter surveys of nearby watercourses are required.

The land within the red line boundary comprises two agricultural fields between which lies a ditch which runs in a southerly direction (see Photo 1 below, ditch 1). This ditch is connected to another ditch which runs along the southern boundary of the western field (see Photo 1, ditch 2) which is itself connected to the Stour Brook which runs along the southern boundary of the eastern field (Photo 2). These watercourses were surveyed for assessment of suitability for riparian mammals along with the section of Stour Brook running along the southern boundary of the site. An additional survey of these watercourses was undertaken on the 11th April 2024 to determine the suitability of the habitat for riparian mammals and look for any fields signs which might help determine their presence/likely absence. The survey involved searching for and recording evidence of water vole and otter presence and activity such as droppings/latrines, burrows, feeding signs footprints, above ground nests and runs through vegetation. The results of this survey are included at Appendix N.

It is worth noting that these surveys were undertaken on a precautionary basis only as all watercourses within and adjacent to the development site are proposed to be retained and will not be directly impacted by the development proposals. However, due to their close proximity to the site they were assessed for any potential indirect effects which may result from the development proposals such as the upgrading of the bridge access to the south of the site. Regarding the pipeline construction, directional drilling will be implemented and leaving a 10m of any watercourse thereby providing an ecological buffer zone, and no impacts are therefore anticipated.

Cambridgeshire and Peterborough Environmental Record Centre (CPERC) was contacted for statutory and non-statutory designated sites and protected and notable species records within 2 km of the Site and the data was received on 25th February 2022. They also provided records from Suffolk Biodiversity Information Services (SBIS) as the Site crosses the boundary for both record centres. CPERC and SBIS returned no records of water vole or otter from the data search within a 2 km search radius of the application Site. No evidence of water vole or otter was identified during the survey undertaken on 11th April 2024 both within the ditches and Stour Brook. The ditches are considered to be dry for most of the year and consequently are considered to have negligible potential to support riparian mammals. The site is therefore considered to have negligible potential to support riparian mammals.

Ecology

9. Response to Suffolk County Council (Ecology), Suffolk Wildlife Trust & West Suffolk Council Ecology

Photo 1 – Ditch 1 (left) and ditch 2 (right) both dry

b) The biodiversity net gain assessment needs to include consideration of hedgerows and watercourses which border the site

The land within the red line boundary comprises two agricultural fields between which lies a ditch which runs in a southerly direction (see Photo 1 above, ditch 1). This ditch is connected to another ditch which runs along the southern boundary of the western field (see Photo 1, ditch 2) which is itself connected to the Stour Brook which runs along the southern boundary of the eastern field (Photo 2 above). Both ditches are considered to be dry for most of the year and in line with guidance have therefore not been included in the BNG assessment.

The submitted BNG Assessment of the Site compared the predevelopment baseline conditions against the post development layout plan and habitat creation. This was calculated at the time following Natural England's Biodiversity Metric 4.0. The assessment has now been updated to address concerns over the inclusion of linear watercourse habitats. This BNG update has been undertaken using the newer Statutory Biodiversity Metric for completeness, attached as Appendix O.

A River Condition Assessment (RCA) Survey was undertaken by Katherine Jones and Alice Mason on the 11th April 2024. Katherine is an accredited member in conducting MoRPh5 field surveys and River Type desk studies, recording data using the RCA information system and interpreting RCA Indicators and Score for baseline and post intervention River Metric assessment. Two MoRPh5 surveys were undertaken on the Stour Brook section running along the southern boundary of the eastern field. The most easterly was assigned a moderate condition and the most westerly section was assigned a fairly poor condition. Feasible enhancement/management measures were tested to raise these conditions to fairly good and moderate respectively. These include improving the habitat of the riparian zone, in channel enhancements such as incorporating gravel and cleaning debris, and improving vegetation at water margin. These enhancements would translate to a 17.83% net gain in linear river units. It is understood that the biodiversity net gain identified within our assessment is subject to the development of landscape planting plans and site management plans to secure the

Ecology

9. Response to Suffolk County Council (Ecology), Suffolk Wildlife Trust & West Suffolk Council Ecology

predicted level of biodiversity delivery and therefore, an Ecological Management Plan covering these aspects should be conditioned.

7.0 Landscape & Visual Impact

Landscape & Visual Impact

10. Response to Suffolk County Council (Landscape)

a) A landscape led approach to the design of the entire scheme is required.

To respond to the comments of SCC regarding landscape and visual matters, Acorn Bioenergy Limited instructed a peer review of the LVIA and Environmental Statement (ES) by an independent landscape practitioner, Peter Radmall Associates (PRA). The integrity and methodology of the original assessments have been reviewed to ensure a sound basis to underpin the provision of further information required by SCC within its Regulation 25 request. A site visit and evaluation of selected desktop data sources have also been undertaken to inform the response set out below.

As set out in the Planning Statement (3.2, Design Principles) *The layout and design of the proposed development was considered as part of an iterative design process aimed at reducing the potential environmental effects, whilst accommodating operational and commercial requirements.*

In this context, landscape and visual effects have been considered in the design process alongside the other effects addressed in the EIA. The Planning Statement (3.2.1) confirms that "*Considerable efforts were made to produce a Site layout which achieves the most satisfactory relationship with the landscape of the Site whilst respecting other environmental and technical considerations"*. There is a limit to the degree to which landscape considerations in any development can override other factors, and in this instance the design of a facility with locational, technological and operational requirements cannot reasonably and practicably be wholly landscape-led.

This 'limit' to the consideration of landscape in the design process is, however, substantially mitigated by the inherent landscape advantages of the site as originally considered during site selection, which ultimately emerge from the LVIA and EIA. These include:

- its valley setting, which to a degree allows the development to be contained within the low plateau that is characteristic of the surrounding area;
- the strong vegetation structure that encloses the site to the north/west (outgrown hedgerow/trees) and south (woodland/poplar plantation/former railway embankment);
- proximity to the infrastructure and traffic associated with the main road; and
- intervisibility with the urban fringe of Haverhill, including Epicentre and medium-rise housing.

Landscape & Visual Impact **10. Response to Suffolk County Council (Landscape)**
b) A landscape implementation, after-care and long term maintenance plan is required.
This is acknowledged to be a common and reasonable means to securing the necessary landscaping and mitigation. It has been the approach followed by the applicant on previous AD schemes, and can reasonably be specified and secured by a suitably worded condition in the event that planning permission is granted.
c) All of the proposed fencing is industrial and is not suited to the countryside location. **d) Fencing lines require clarification.**
The Planning Statement (4.4.3) states that: *The AD facility would be enclosed by means of Protek anti-climb fencing around the core site (or similar). Deer/wildlife fencing would be installed around the perimeters of the lagoons.* The fencing around the core facility is acknowledged to be similar to that typically used around industrial sites. Whilst this is generally not characteristic of rural areas, it does have applications in agricultural settings where enhanced security is required, and in this instance is consistent with the infrastructural character of the development and its urban fringe location. The limited choice of this fencing as specified is determined by the need for security to minimise risks of unauthorised entry and/or vandalism. Where such security is not essential, deer fencing (as commonly used in agricultural settings) is otherwise specified. Appendix P details the revised drawings of the proposed fencing types, with a plan showing their location on the main site.
e) The proposed changes to receptors to the east of the main site would be significant.
This comment is assumed to relate to visual receptors and to viewpoints (VPs) 1, 4 and 12. ES Chapter 5 confirms that the effects on VP1 during construction and at operational years 0 and 15 would be significant. However, it does not consider the effects on VPs 4 and 12 to be significant. The effects on VP4 are predicted in the original LVIA and ES to be, at most, moderate. The LVIA methodology (ES Chapter 5, Appendix A, Figure A-6) confirms that the attribution of EIA significance is based on judgment. Put simply, this means that major effects are definitely significant, minor effects definitely are not, and moderate effects may/may not be significant, depending on the circumstances in each case. At VP4, the visual amenity of users of West Town Park derives primarily from their proximity to the Stour Brook, the character of the park and its wider setting of countryside to the north. Since the development would have no material effects on these influences, the effect is not considered by PRA to be significant and the original conclusions of the LVIA and ES are supported and maintained.

Landscape & Visual Impact
10. Response to Suffolk County Council (Landscape)

Effects on VP12 are not considered to be significant, due to a combination of distance from the site and the reduced sensitivity of receptors at this location (a pub car park on the settlement edge). This gives rise to minor effects, which would have no material implications for amenity. The original conclusions of the LVIA and ES in this regard are therefore also supported and maintained.

f) Disagreement that by year 15, the proposed woodland would have mitigated the projects effect from negative to positive

The comment does not specify which views/receptors are meant, but is assumed to relate to VPs 1, 4 and 12, from where the effect of the woodland would be most apparent.

As shown in the photowires/montages, the mitigating effects of the woodland would become evident in two stages following the adverse Year 0 effects:

i. It would progressively screen the development, providing a degree of mitigation by Year 5 and virtually complete mitigation by Year 15; and

ii. It would introduce more tree cover into a landscape from which much has been lost over the last 50 years or so through hedgerow decline/removal. This will help to reinforce the existing vegetation pattern, which would in the long-term be beneficial to landscape character (and to biodiversity).

The cumulative impact of the woodland, as seen in this urban fringe context, is therefore considered to be beneficial and the original conclusions of the LVIA and ES are supported and maintained.

g) Open views across the valley will be lost due to the proposal.

The locations of the views to which this comment relates are not specified, but VPs 1 and 5 are most representative of such cross-valley views.

In relation to VP1, at Year 0 the bunding on the eastern part of the site would introduce slightly more screening than is currently provided by the tree cover south of the site, but the openness of the view would not be lost. By Year 5, however, the view across the site (and thereby much of the valley) is likely to be substantially screened by the woodland planting. By Year 15, this part of the view – to the right (west) of the PRoW - is likely to be wholly screened and thereby no longer available. But the view along and to the left (east) of the PRoW would remain open.

In relation to VP5, the photowire demonstrates that the upper part of the development would be visible above the intermediate horizon that forms the nearest side of the valley. However, the development would not breach the distant horizon or be perceived as a major obstruction – the view would remain overwhelmingly open.

In conclusion, whilst the close-range view across the site (and thereby the valley) from the adjoining section of the PRoW would be lost, this would be due to the mitigation planting rather than the

Landscape & Visual Impact 10. Response to Suffolk County Council (Landscape)
development itself, and would be unavoidable. The remainder of these views across the valley (to the east of the PRoW) would be unaffected. Filtered views of the dome structures are likely to be obtained from the more elevated section of the PRoW to the north, but would maintain the openness of the vistas across the valley. It should be noted that views can be obstructed within the countryside by tree planting or hedgerow restoration taking place under various funding incentives without planning consent. The comment by SCC does not require the submission of 'further environmental information' as such. Having been reviewed, it does not affect or alter the original conclusions of the LVIA and ES, which are supported and maintained.
h) Visual receptors to/from Silver Street will have filtered views of the AD plant domes.
Whilst it is not entirely clear which receptors are meant, VPs 5, 8 and 11 appear to be most representative of views to/from Silver Street. In relation to VP5, the photowire confirms that the domes are likely to be seen in the middle-ground, through the established hedgerow/tree cover along the northern perimeter of the site. The montages indicate that the domes would be visible (but scarcely prominent) at Years 0 and 5, and would be substantially screened by Year 15. Re VPs 8 and 11, no views towards the domes would occur - the VPs are shown to fall outside the ZTV. In conclusion, the filtered view effect applies to only one viewpoint, which is representative of a relatively discrete location and from which the domes are not predicted to be readily visible in the longer-term. The comment by SCC does not require the submission of 'further environmental information' as such, and having been reviewed does not affect or alter the conclusions of the LVIA and ES.
i) The levels of reinforcement planting along southern, western and northern boundaries of the main site is unclear.
The type and extent of reinforcement planting can be identified from SLR Fig 6 (landscape strategy) of the ES submitted with the planning application. It is acknowledged that the format of this drawing (an overlay on an aerial photo) is somewhat schematic, but it is a common and accepted way of presenting a landscape strategy and is considered to be fit for purpose, i.e. for showing what mitigation is proposed, and where, to be taken into account during the assessment process. Further details of reinforcement planting can reasonably be specified and secured by a suitably worded condition in the event that planning permission is granted.
j) The western boundary vegetation of the main site requires enhancement.

Landscape & Visual Impact
10. Response to Suffolk County Council (Landscape)

The photowire for VP3 shows that the vegetation along the western boundary is “gappy”, allowing a view through to the development to the north of the poplar plantation.

The Landscape Strategy Plan confirms that mixed native shrub planting is proposed along this boundary by way of reinforcement, although it is not shown to infill this gap.

It is proposed to remedy this through site-specific native tree planting specified and secured by a suitably worded condition in the event that planning permission is granted.

k) Reshaping and integration into the existing landscape is required for the proposed bunding east of the main site.

l) Reshaping and integration into the existing landscape is required from the proposed bunding to the north of the lagoons.

The bunding on the eastern part of the site comprises a surplus soil stockpile, which the GGP Site Levels Plan shows as an “earth bund” with a tabular profile. Other areas of cut/fill, specifically the bunding to the north of the lagoons, are shown with similarly engineered profiles.

The engineered profile of the eastern bund is evident in the Year 0 visualizations for VPs 1, 4 and 12. However, the bund would be planted with woodland, which the visualizations confirm would substantially obscure the landform by Year 5 and completely obscure it by Year 15. The woodland thereby becomes the main influence on this part of the view, such that the landform would have no residual visual effect.

The bunding associated with the lagoons is not obvious in any of the assessment views, and has no material influence on the reported effects. The engineered character of these earthworks minimizes land take, which would need to be substantially greater if slope profiles were to be fully integrated into the natural terrain. It is also consistent with the infrastructural character of the facility, where this is visible.

Since the earthworks are already assessed in the LVIA and ES to have no long-term effect on VPs 1,4 and 12, any change to the shaping of the bunding is unlikely to result in any material change to the predicted effects as already reported in the LVIA and ES. Reshaping the bunding is therefore considered to be neither necessary nor proportionate.

m) Consideration needs to be given to the proposed eastern woodland to how it can mitigate impacts of the proposed development, but also afford some depth of view and vistas.

The montages for VPs 4 and 12 demonstrate that this woodland would provide effective mitigation by Years 5/15. Providing depth of view/vistas would require creating more gaps or variation in this woodland, so as to open up views through the tree cover. This would almost certainly open up views of the development, thereby increasing its impact and reducing its integration into the surrounding vegetation structure.

Landscape & Visual Impact
10. Response to Suffolk County Council (Landscape)

Whatever visual benefits might be achieved by creating depth of views/vistas would be neutralised by the disbenefit of reduced mitigation. The current scheme is therefore considered to provide a practicable balance between these considerations.

n) Local green infrastructure and hedgerow enhancement should be considered along the pipeline route.

The pipeline will cross and run within agricultural fields that will continue to be farmed, and which will return to agricultural use in the future. It would be inappropriate to provide planting along the cable corridor as this will carve up and reduce the size of agricultural fields and effectively sterilise agricultural land during the operation of the proposed development, and significantly reduce the potential to return the land to full agricultural use in the future. The pipeline route will not provide a recreational route or public access.

In terms of any requirements for mitigation planting, the pipeline would be installed using directional drilling, allowing it to pass beneath hedgerows with minimal impact – no trees or sections of hedgerow would need to be removed. It would therefore have no physical impact on hedgerows, and no hedgerow enhancement is required to provide mitigation for the underground works.

o) Clarification around out of operational hours maintenance and the requirement for associated lighting is required.

'Out of operational hours maintenance' (and therefore lighting) is taken to mean night-time, when the facility – which will be operational on a continuous basis – would otherwise be unmanned. The likely occurrence of such maintenance is difficult to predict, as by its very nature it would be unscheduled and would take place only if/when urgently required. The time periods during which out of hours maintenance is likely to vary through the calendar year.

A Lighting Assessment was submitted as part of the ES, and its findings are summarized in the Planning Statement as follows:

'The proposed development will be compliant with the residential receptor criteria as set out in the Institution of Lighting Professionals (ILP) Guidance Note 01/21: The Reduction of Obtrusive Light. Specifically, the assessed lighting associated with the Proposed Development is compliant with the obtrusive light criteria as set out for ILP Environmental Zone E2'.

The Planning Statement identifies a series of mitigation measures that have been embedded into the site layout, design and management, so as to ensure that lighting does not become a source of visual impact, nuisance, driver risk or ecological harm. These principles would apply to any lighting required during out-of-hours maintenance. The effect of any necessary lighting would be infrequent and temporary, and therefore would not be significant in landscape and visual terms.

8.0 Arboriculture

Arboriculture **11. Response to Suffolk County Council (Landscape)**
a) The orange line indicating removed vegetation is not clear and there is risk the contractor could cut back to the red line. Include a hatch area to indicate areas in which vegetation needs to be removed, which can be clearly legible in colour and black and white versions.
The orange line is visible on the plans and works would be agreed in advance on site with the construction manager prior to any removal works being undertaken. The advice provided can be taken forward and incorporated in construction drawings post-determination.
b) Justification for the removal of vegetation around the new access from the A1307 is required.
No hedgerow is required to be removed to enable the new access from the A1307. The revised proposed access design is contained at Appendix G (see Appendix A of the Motion Transport Addendum), which moves the proposed junction design slightly west of the original proposed junction, further away from the existing hedgerow.
c) Justification to why the pipeline cannot avoid Grp 2 is required.
No works are proposed which affect Grp 2, which lies within the main AD facility site, as shown at Appendix CB5 of the submitted Arboricultural Impact Assessment (CBA drawing 11636.03 TPP). The pipeline has been designed to avoid intrusion on existing trees and hedgerows, with horizontal directional drilling deployed where the pipeline needs to cross existing hedgerows, watercourses and roads to avoid any direct impact.

9.0 Land Contamination

Land Contamination
12. Response to West Suffolk Council (EHO)

a) Inclusion of the disused railway within the ground contamination investigation report.

A Ground Investigation (GI) Report has been completed on the main site and was undertaken prior to receipt of the Regulation 25 request. The GI scope had been developed on the basis of the findings from the Preliminary Land Quality Risk Assessment (PLQRA) which identified the southern site area (including disused railway) as a low risk potential for contamination to be encountered that could impact on the development, and the use of this area as an access road into the site as part of the layout design.

We recognise that localised contamination could be present in the southern area of the site at the location of Spring Grove Farm, around the disused railway. Given the provision of the additional Phase 2 Ground Investigation information (see below), it is considered that this could be addressed through the implementation of a watching brief (and subsequent removal or risk assessment if potentially encountered) as road construction works are undertaken. Should further unknown contamination be encountered then it could be dealt with as construction works are undertaken, and this provision is commonly encapsulated within a suitably worded planning condition.

Therefore, as confirmed, ground investigation will be undertaken in the northern extent of the site prior to commencement, where a moderate/low risk has been identified in the footprint of a proposed digestate lagoon which extends into the former RAF base in that area.

Phase 2 Ground Investigation

Prior and separate to receipt of the Regulation 25 request (and on the basis of the conclusions and recommendations within the PLQRA), a Phase 2 Ground Investigation was completed by SLR in August 2022.

The report is provided at Appendix Q. The report was devised on the basis of the findings from the PLQRA.

Section 2.2 of the Ground Investigation Report states

"The previous Phase 1 Preliminary Land Quality Risk Assessment (PLQRA) qualitatively assessed potential land contamination risks associated with the site for a commercial/light industrial use.

The assessment did not identify any potential contaminant sources at the site. Fuel stored at the farmhouse was not considered a significant source of contamination due to it being contained within an integrally bunded tank and because there was no evidence of bulk storage of oils, fuels or chemicals in the outbuildings.

Made ground associated with the former railway embankment adjacent to the south of the site was not considered as a potential significant off-site source of contamination given its age since construction (1800s) and last use as a railway line (1960s) and that it is covered with well-established trees and bushes. Given the lack of potential sources of contamination there was no requirement at the PLQRA stage to assessment potential pathways and sensitive receptors."

As such, these areas were not specifically targeted by the investigation due to their low risk potential for the proposed commercial/light industrial development. The scope instead focused on providing coverage of investigation locations across the main development site area to provide coverage of baseline contaminant conditions prior to development.

Land Contamination

12. Response to West Suffolk Council (EHO)

The ground investigation at the time did not include for the area at the northern extent of the site (digestate lagoon within RAF Wratting Common), which as noted would be completed as a separate phase of work.

The ground investigation for the main development site included 7no. trial pits, 4no. window samples and 1no. deep cable percussive borehole (with a further 16no. dynamic probe locations and 10no. plate load tests for geotechnical/development design purposes).

During the ground investigation no made ground was found to be present or evidence of any visual and/ or olfactory indications of possible contamination. Field screening of soil samples from all the exploratory hole locations was undertaken using a Photo Ionisation Detector (PID) with no organic vapour concentrations recorded throughout (<0.1ppm).

A suite of soil analysis included for metals, PAHs, TPH, cyanide, asbestos and TOC, pH. No exceedances of the screening criteria protective of human health were recorded in the soils sampled from the main site in relation to a commercial land use.

No further investigation or remediation was considered necessary for the proposed development; however, a watching brief was required to be maintained for encountering potentially unexpected contamination during development.

Southern Site Area

The proposed southern site area at the location of Spring Grove Farm will be used as an access road into the site and will not contain structures, buildings or equipment associated with the Anaerobic Digestion facility.

Whilst there will be some enabling works required in this area, it will be at relatively shallow depths for the purposes of road construction. Whilst it is acknowledged there could be localised impacts with respect to water receptors in this area from previous farming use and made ground associated with the disused railway, given the low risk rating identified, it is considered that if contamination is encountered during the construction phase that it could be dealt with via implementation of a watching brief and subsequent delineation and removal for disposal offsite, or retained as part of road construction design supplemented by an appropriate environmental risk assessment to demonstrate its suitability for use.

Whilst there is a lack of sensitive human receptors around the vicinity of the site who could be impacted from the above works, risks to human health are likely to be mitigated through PPE/RPE and behavioural control measures outlined in a CEMP.

10.0 Statement of Community Involvement

Statement of Community Involvement 13. Response to Suffolk County Council (Planning)
a) Update the statement of community involvement to remove references to Silver Street.
All references to Silver Street have been removed from the Statement of Community Involvement, as resubmitted on 22 September 2023; a copy has been included in Appendix R for ease.

11.0 Site Selection

Site Selection
14. Response to Suffolk County Council Planning

a) A comparison of the environmental effects of the reasonable alternatives as part of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 Schedule 4 Part 2.

Regulation 17(3)(d) states that an Environmental Statement should include:

‘‘a description of the reasonable alternatives studied by the applicant or appellant, which are relevant to the proposed development and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the significant effects of the development on the environment”.

Paragraph 2 of Schedule 4 expands upon this by adding that the information to be provided (where appropriate) should include:

“A description of the reasonable alternatives (for example in terms of development design, technology, location, size and scale) studied by the developer, which are relevant to the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects.”

Guidance contained in the Planning Practice Guidance portal comments that:

“The 2017 Regulations do not require an applicant to consider alternatives. However, where alternatives have been considered, paragraph 2 of Schedule 4 requires the applicant to include in their Environmental Statement a description of the reasonable alternatives studied (for example in terms of development design, technology, location, size and scale) and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects.”

Alternative sites are set out in the appended Planning Design & Access Statement and considered within Chapter 3 of the submitted ES (Project Description) that set out the Applicant’s approach to Site Selection. In addition to the site being available and physically able to accommodate the scale of the proposed development, the site selection which was guided by several factors as listed below, such that the proposed development could be functional as a viable AD facility:

- landscape character and visual amenity;
- location of residential properties – proximity to noise sensitive receptors;
- presence of protected habitats and species;
- potential for traffic, transport and access effects;
- presence of archaeological and cultural heritage features;
- presence of watercourses and associated flood risk (including surface water);
- key recreational routes and other land users; and
- presence of existing utilities including power lines, pipelines and telecommunications links.

The applicant (Acorn Bioenergy Limited) considered two alternative locations for the proposed development at the initial project development stages, near the former RAF Wratting Common airfield and north of Silver Street. Within these locations, three sites were available, two near to the former RAF Wratting Common and one north of Silver Street. All three alternative sites have been

Site Selection
14. Response to Suffolk County Council Planning

considered alongside the site subject of this planning application in this response as part of this Regulation 25 request.

Site Selection

In determining the preferential site, the site selection process was iterative and sought to minimise environmental effects as far as practically possible, whilst also ensuring the preferred site would be commercially viable.

The sites considered are wholly located within the Thurlow Estate landholding and were initially reviewed at screening stage prior to the final selection. The screening process was informed by several factors, as noted above, as well as the key drivers that would enable the site to function as a viable AD facility. This is coupled with discussions with the landowners who provided details on land availability and arrangements.

In addition to the criteria mentioned above, Acorn also required that from an operational perspective that the site should :

- be within close proximity to the primary sources of feedstock including energy crops and manures produced on the surrounding agricultural land;
- be within sufficient proximity to the local road network for feedstock deliveries and biomethane, CO2 and digestate removal;
- have local power grid connection as a back up to the on-site electricity generation; and
- be capable of meeting planning and environmental criteria to avoid adverse amenity impacts, visually screened where feasible from sensitive views, and minimising impacts on flora and fauna.

Additionally, ‘best and most versatile’ agricultural land should be avoided.

Moreover, potential locations for the AD facility were considered against the guidance set out by the Environmental Agency as listed below:

- Absence of groundwater source protection zone 1 within the Site;
- Minimum distance of 10 metres of a watercourse;
- Absence of An Air Quality Management Area (AQMA);
- Minimum distance of 200 metres of a European Site, Ramsar site or a SSSI; and
- Minimum distance of 200 metres of a sensitive receptor (unless the stack height is greater than 7m (or “3m effective height). Sensitive receptors including human receptors (such as residential dwellings) and ecological receptors (such as habitats, protected sites).

Also considered during the site selection process was the application of key design principles, which had the overarching aim of producing a site layout which achieves the most satisfactory relationship with the landscape of the Site whilst respecting other environmental and technical considerations. Such environmental and technical considerations were informed by a multidisciplinary project team who identified several opportunities/constraints.

The environmental constraints considered by the project team comprise:

- landscape character and visual amenity;
- location of residential properties – proximity to noise sensitive receptors;

Site Selection
14. Response to Suffolk County Council Planning

- presence of protected habitats and species;
- potential for traffic, transport and access effects;
- presence of archaeological and cultural heritage features;
- presence of watercourses and associated flood risk (including surface water);
- key recreational routes and other land users; and
- presence of existing utilities including power lines, pipelines and telecommunications links.

Alternative Sites Considered

The following section provides further detail on the Sites considered and provides a comparison of the environmental effects of the sites which, along with the operational and regulatory requirements, informed the identification of a preferred site. It presents an explanation as to why they were not taken forwards.

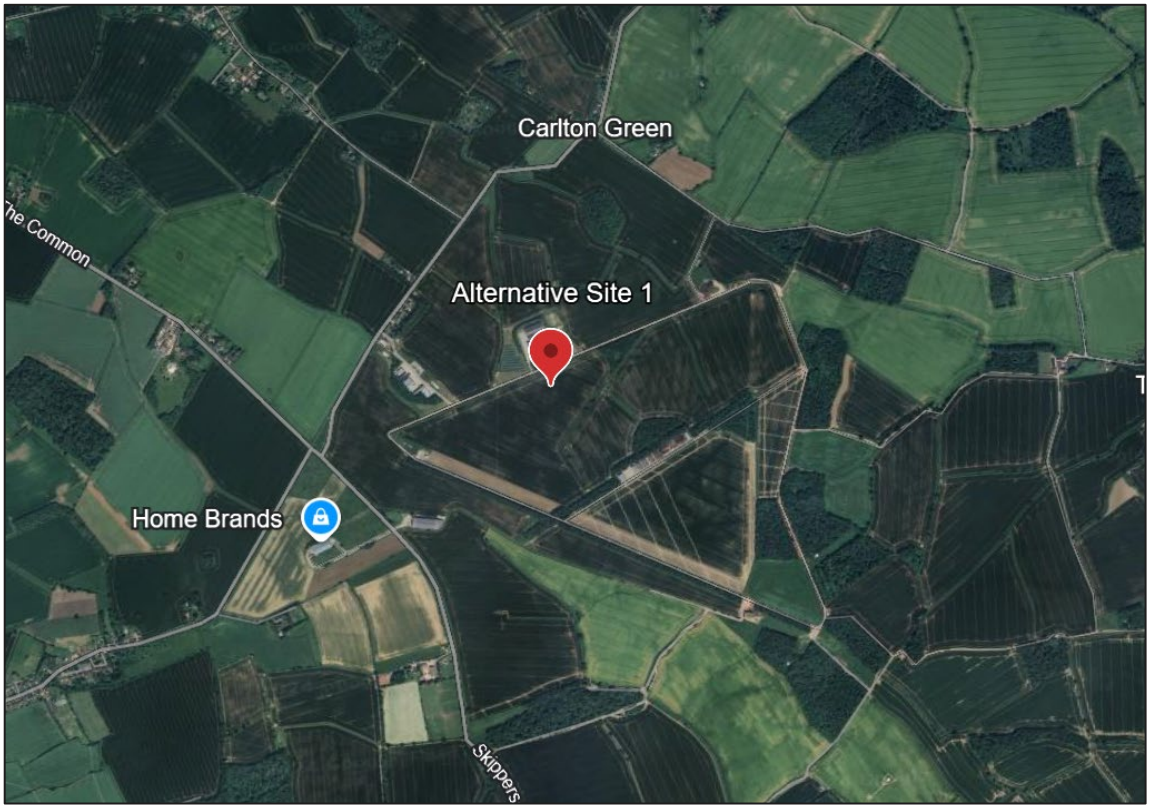
Location of Alternatives Sites and the Proposed Development Site

Alternative Site 1 is located approximately 3.3km north of the proposed development Site and comprises 5.69ha of agricultural land which can be accessed via Common Road (South). This

Site Selection
14. Response to Suffolk County Council Planning

alternative site also formally operated as a bomber command airfield during World War 2 which is known as the 'RAF Wratting Common'.

Alternative Site 1 location (accessed from Common Road (south) and visible from Skippers Lane to the southwest)



Site Selection
14. Response to Suffolk County Council Planning

This alternative site was discounted for operational reasons. Whilst in reasonable proximity to the trunk road network, the site is accessed from a narrow country lane, uncapable of handling the vehicle types and volumes associated with the AD facility without adverse impact, with no alternatives for diverting traffic. The nearest A-road is approximately 3.4km away to the south, whereas the selected site is accessed directly from the A1307Cambridge Road.

Further to the above, immediately north of the Site on the adjacent land lies an existing grain store facility, granted consent in November 2008. The operations associated with this existing facility may conflict with the proposed development, particularly during peak harvest periods.

There is also a designated PRoW located to the west of the site. Whilst the AD would unlikely affect users of the route, it does not fare as well as the preferred site which is already well screened from any public routes. Nonetheless, should the proposed development be located in this location, mitigation planting could be employed to reduce effects on the PRoW. However, this would affect the land being reverted back to agricultural use in the future, by sterilising part of the agricultural field or requiring trees to be removed at a later date.

Notwithstanding the above, the site location is acceptable from an environmental perspective including (not exhaustive) its location outside of any environmental designations, being within a low flood risk (Zone 1), being outside the agricultural land classification 1 and being at a considerable distance (approximately 0.9km) from any heritage receptors. However, there are receptors such as commercial and dwelling receptors within a close vicinity. Several of the environmental characteristics are also comparable for the proposed site at Spring Grove Farm. However, the adverse impact and operational disadvantages of this site owing to accessibility mean the proposed site is preferable.

Alternative Site 2

The second alternative Site considered is located approximately 0.31km to the West of alternative site 1. The alternative site also comprises agricultural land (4.95ha) and is located off an unnamed road off Common Road where it can be seen from Common Road and Skippers Lane.

Alternative Site 2 location (accessed from an unmade road that adjoins Common Road to the Northwest and visible from Skippers Lane to the Southwest)

Site Selection

14. Response to Suffolk County Council Planning

This alternative site has similar constraints to that discussed for alternative site 1; that whilst in reasonable proximity to the trunk road network, the site is accessed from a narrow country lane, uncapable of handling the vehicle types and volumes associated with the AD facility without adverse impact, with no alternatives for diverting traffic. In addition, the operations associated with the proposed AD facility could conflict with those of the existing grain store, particularly during peak harvest periods.

As with alternative site 1, significant planting would be required to screen the proposed development, although this could be achievable and fit with the existing field pattern without sterilising part of an agricultural field. It is recognised that whilst this could be considered a negative landscape impact it could comprise a beneficial impact in biodiversity gain in the longer term.

Also similar to alternative site 1, the site location is acceptable from an environmental perspective including (not exhaustive) its location outside of any environmental designations, being within a low flood risk (Zone 1), being outside the agricultural land classification 1 and being at a considerable distance (approximately 0.6km) from any heritage receptors. However, there are receptors such as commercial and dwelling receptors within a close vicinity. Several of the environmental characteristics are also comparable for the proposed site at Spring Grove Farm. However, the adverse impact and operational disadvantages of this site owing to accessibility mean the proposed site is preferable.

Site Selection
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Alternative Site 3

The final alternative site considered is located approximately 1km northwest of the proposed development and is also made up of agricultural fields (5.98ha).

Alternative Site 3 Location (accessed of Silver Street towards the southern portion of the Site and is isolated from the main highway (A1307) which is located further south):

Site Selection
14. Response to Suffolk County Council Planning

The primary reasons that led to this alternative site being discounted was due to accessibility; the alternative site is only accessible from Silver Street (a narrow road) and is isolated from the main highway, with a lack of alternative routes. This makes vehicle movements and HGV access impractical, which as discussed, are a fundamental to the overall operations associated with the proposed AD facility.

As with alternative site 1, there is also a designated PRoW located along the western/northern boundary of the site. Significant screening planting would be required on otherwise largely open agricultural fields, meaning that part of the field would likely be sterilised from reverting to a similar open field pattern in future.

As with the other two alternative sites, the site location is acceptable from an environmental perspective including (not exhaustive) its location outside of any environmental designations, being within a low flood risk (Zone 1), being outside the agricultural land classification 1. However, there are receptors such as commercial and dwelling receptors and heritage receptors within a close vicinity. Several of the environmental characteristics are also comparable for the proposed site at Spring Grove Farm. However, the adverse impact and operational disadvantages of this site owing to accessibility mean the proposed site is preferable.

Summary

This section of the Regulation 25 EIA Addendum summaries the operational and regulatory drivers and compares the environmental considerations that informed the site selection process. In total, three alternative sites were considered. From the sites available within the Thurlow Estate landholding, the final site at Spring Grove Farm was identified to be occupying a suitable and sustainable location for the development of an AD facility and associated infrastructure, with no greater environmental effects than any of the alternative sites considered. This is due to the site being close to the primary sources of feedstock and well located for access to the A1307 Cambridge Road and the wider road network for delivery and offtake.

All the alternative sites contain constraints that would prevent the viability of the proposed development owing to being served by narrow roads which make HGV access impractical and in the case of alternative sites 1 and 2, meaning vehicles would need to travel through small villages. As a result the preferred site has the benefit of being environmentally preferable owing to a lesser impact on traffic and noise grounds. However, all four sites considered were broadly comparable, therefore the influence of the technical, operational and regulatory requirements weighed the site selection towards the preferred site subject of this planning application.

The following table summarises the technical assessment findings relative to each site, compared to the selected site (Spring Grove Farm):

14. Site Selection Response to Suffolk County Council Planning (Environmental Considerations Table)				
Environmental Topic	**Selected AD Site (Spring Grove Farm)**	**Alternative AD Site 1 (RAF Wratting Common)**	**Alternative Site AD 2 (located off Common Road)**	**Alternative AD Site 3 (located off silver street)**
Landscape[1,2]	Situated in the South Suffolk and North Essex Clayland NCA and the Rolling Estate Farmlands LCT	Situated in the South Suffolk and North Essex Clayland NCA and the Undulating Estate Farmlands LCT	Situated in the South Suffolk and North Essex Clayland NCA and the Undulating Estate Farmlands LCT	Situated in the South Suffolk and North Essex Clayland NCA and the Undulating Estate Farmlands LCT
Agricultural Land Classification[3]	Grade 2	Grade 2	Grade 2	Grade 2
Air Quality[,4]	Nearest receptor (commercial) located 0.21km	Nearest receptor (commercial) located 0.3km	Nearest receptor (commercial) located 0.1km	Nearest receptor (residential) located 0.2km
	Nearest Ancient Woodland located approx. 0.3km east (Cadge's Wood)	Nearest Ancient Woodland located approx. 1km southeast (The New Plantation)	Nearest Ancient Woodland located approx. 0.8km west (Rands Woods)	Nearest Ancient Woodland located approx 0.85 north (Lawn Wood and Over Wood)
Noise	Nearest receptor (residential) located approx. 0.32km	Nearest receptor (residential) located approx. 0.5km	Nearest receptor (residential) located approx. 0.1km	Nearest receptor (residential) located approx. 0.25km
Transport	Similar receptors above (however less sensitive given	Similar receptors above (however more sensitive	Similar receptors above (however more sensitive than	Similar receptors above (however more sensitive than the sites access via country lane)

[1] Natural England (undated) National Character Area Profiles. Available at: https://nationalcharacterareas.co.uk/.

[2] Suffolk County Council (2009) Suffolk Landscape Character Assessment. Available at: https://suffolklandscape.org.uk/.

[3] Natural England (2019) Provisional Agricultural Land Classification (ALC). Available at: https://www.data.gov.uk/dataset/952421ec-da63-4569-817d-4d6399df40a1/provisional-agricultural-land-classification-alc.

[4] Natural England (undated) Ancient Woodlands. Available at: https://publications.naturalengland.org.uk/map?category=552039.

14. Site Selection Response to Suffolk County Council Planning (Environmental Considerations Table)				
	the sites access of the A1307)	than the sites access via country lane)	the sites access via country lane)	
Cultural heritage[5]	Nearest heritage asset is the Limberhurst Thatch (Grade II listed building), located 0.5km east.	Nearest heritage asset is the Woodman House (Grade II listed building), located 0.9km north.	Nearest heritage asset is the Brook Farmhouse (Grade II listed building), located 0.6km Northwest	Nearest heritage asset is the Sliver Street Farmhouse (Grade II listed building), located 0.25km East
Ecological Designations[6] (AONB, SSSI, Sites of Interest for Nature Conservation (SINCS) or Local Nature Reserves (LNRs) and designated)	Nearest ecological designation located 0.6km east of the site (Haverhill Railway Walks Local Nature Reserve LNR)	Nearest ecological designation located 1.7km south of the site (Over and Lawn Woods SSSI)	Nearest ecological designation located 1.8km south of the site (Over and Lawn Woods SSSI)	Nearest ecological designation located 0.25km north of the site (Over and Lawn Woods SSSI)
Flood Risk[7]	The Site is predominantly located in Flood Zone 1, including the extent of where the AD facility will be located (see the appended sequential test).	Flood Zone 1	Flood Zone 1	Flood Zone 1

[5] Historic England (2024) Search the List: Map Search Available at: https://historicengland.org.uk/listing/the-list/map-search.

[6] Magic (2024) Magic Maps. Available at: https://magic.defra.gov.uk/MagicMap.aspx.

[7] UK Government (2024) Flood map for planning. Available at: https://flood-map-for-planning.service.gov.uk/.

12.0 Waste Availability

Waste Availability 15. Response to Suffolk County Council (Planning)
a) An assessment of the current availability of appropriate waste products within the local market area, taking into account plans for facilities requiring the same waste feedstock in the surrounding area.
Acorn have prepared information addressing this point of the Regulation 25 request which is presented in Appendix S. The appendix provides a high-level indication of interested feedstock counterparties for the supply of the proposed biomethane facility at Spring Grove. It outlines that within a 10-mile initial feedstock catchment radius, assuming total farming land use is given over to a single crop, it can be reasonably expected that there is potential for c.2,000,000t of maize, whole crop silage or grass. The is taking into consideration other planned facilities in the surrounding area that would require feedstock.

13.0 Cumulative Impacts

Cumulative Impacts **16. Response to Suffolk County Council (Planning)**
a) An assessment of cumulative impacts in relation to the current application CC/23/110/FUL Land at Streetly Hall Farm under consideration by Cambridgeshire County Council. The following subjects will need to be considered: **i. Noise.** **ii. Air Quality.** **iii. Odour.** **iv. Transport.**
Note – the planning application referred to above has now been granted planning permission, in July 2024. It was not subject of EIA.
i) Noise
A Noise Addendum Report is provided in Appendix T, which discusses cumulative noise impacts with respect to the proposed development at Land at Streetly Hall Farm (see planning application ref CC/23/110/FUL). The addendum uses an additional supplementary methodology to calculate the propagation effects from noise sources associated with the cumulative development (cumulative sum of operational activities, and construction activities). Section 3.0 of the addendum concludes noise levels from operational and construction activities remains at or below legislative noise limits.
ii) Air Quality and iii) Odour
An Air Quality and Odour Addendum report is provided in Appendix U, that assesses cumulative air quality impacts, which has had consideration to human health receptors, odours, ecological receptors. Section 2.1.4 of the addendum concludes that a ‘not significant’ impact at human receptor locations would be observed, and impacts at ecological receptors are considered to cause ‘no likely damage’ to the Over and Lawn Woods SSSI and ‘no significant pollution’ at the Hare Wood Ancient Woodland.
iv) Transport
Paragraph 8.2 of the Transport addendum (Appendix G) states ‘there are no residual cumulative impacts in terms of highway safety or the operational capacity of the surrounding highway and transport networks’.

14.0 Risk of Accidents

Risk of Accidents **17. Response to Suffolk County Council (Planning)**
a) An assessment of the measures in place to avoid the risk of damage to human health and the environment if plant malfunction occurs (e.g. the pipeline between the main site and lagoon site).
This submission is accompanied by an Environmental Permit Statement produced by Acorn Bioenergy (see Appendix V). The statement sets out how the site will be compliant with primary environmental regulatory requirements and how the Proposed Development will prevent the risk of accidents (on pages 19-21). This includes compliance with the Construction Design Management (CDM) regulations that have the primary purpose of ensuring subsequent construction, commissioning and operation of the plant will be safe so far as is reasonably practicable. The statement further explains (page 23) that the principal control and mitigation measures for prevention of harm to human health or causing pollution in the local environment is to physically design the Site in a way that prevents the risk of harm wherever possible, or in such a way that potential impacts are reduced to as low as reasonably practicable (ALARP).

15.0 Summary of Likely Significant Effects

The purpose of a Regulation 25 Request is for further information to be provided by an Applicant, without which the ES cannot be properly considered as an ES. In this sense, further information required through a Regulation 25 Request should focus on assessment of likely significant effects of the Proposed Development (as opposed to more minor points of clarification) and a key part of the process is confirmation of whether (and how) the further information provided in response to a Regulation 25 Request has altered any of the predicted likely significant effects set out in the ES.

The table below provides an overview of all the previously submitted ES chapters. The table notes the key findings of the original ES, the updates required to reflect the addendum and any new results (if any) that will incur as a result.

Environmental Statement Chapter	Summary of ES content and further information provided as part of the Regulation 25 Request	Update to the Environmental Statement resulting from the Regulation 25 Request	Changes to magnitude/significance in the Environmental Statement
Chapter 1 – Introduction	Chapter 1 of the ES, the **Introduction**, provides details on the prospective applicant (Acorn Bioenergy Ltd); SLR Consulting, the proposed application; statutory background (including technical areas included in the scoping report); scope of the EIA and the notice of intention.	**No updates**- the proposed development has not been amended as part of this Regulation 25 EIA Addendum and the scope of the EIA remains the same.	**No change**- Chapter 1 does not assess frequency/magnitude (its purpose is to present the background, purpose and project scope). Therefore, there are no changes in frequency/magnitude.
Chapter 2 – Site & Surrounds	Chapter 2 of the ES, **Site and Surroundings**, describes the site and the surrounding area and is intended to provide the reader with an understanding of its setting in the local area and how it presently looks. A summary is provided below: • The proposed development is located on a on agricultural land to the north of Spring Grove Farm and comprises two adjoining arable fields;	**No updates**- the description of the Site context and its surroundings remains unchanged	**No change-** Chapter 2 does not assess frequency/magnitude (its purpose is to introduce the Site location and provide context regarding the surrounding area).

Environmental Statement Chapter	Summary of ES content and further information provided as part of the Regulation 25 Request	Update to the Environmental Statement resulting from the Regulation 25 Request	Changes to magnitude/significance in the Environmental Statement
	• The Site falls within the administrative boundaries of Suffolk County Council, situated on the rural outskirts of Haverhill market town, West Suffolk - approximately 2km northwest of the town centre; and • The surrounding context is predominantly rural agricultural land, with isolated commercial and residential properties.		Therefore, there are no changes in frequency/magnitude.
Chapter 3 – Project Description	Chapter 3, **Project Description**, provides details of the proposed project at Spring Grove Farm. This chapter consists of the following sections: Site selection, overview of the proposed development and the Site layout. The chapter also set out the key drivers (design principles) that were required for the proposed development to be viable. This includes being in close proximity to existing feedstock sources and avoiding planning/legislative designations. Below is a summary of what the development would comprise: • The construction and operation of an AD facility, associated infrastructure and a new access road on land at Spring Grove Farm; • The receipt of 92,000 tonnes per annum of feedstock from local farms which would be subject to a process of controlled decomposition (anaerobic digestion). This process would generate biogas for injection into the grid.	**Minor updates**- the scale and nature of the Proposed Development described in Chapter 3 remains the same as set out within the planning application other than a minor revision to the proposed revised access design (this is included in Appendix A of the Transport Addendum which is appended to this document at Appendix G, and reported further in Section 6 of this table) and minor amendments to plans	**No change-** Chapter 3 does not assess frequency/magnitude (its purpose is to provide a detailed description of the Project). Therefore, there are no changes in frequency/magnitude.

Environmental Statement Chapter	Summary of ES content and further information provided as part of the Regulation 25 Request	Update to the Environmental Statement resulting from the Regulation 25 Request	Changes to magnitude/significance in the Environmental Statement
	• The AD process would also produce liquid fertiliser (digestate), which would be transferred to two offsite lagoons for easy offtake via a 3km pipeline to the north. As per Chapter 3, the applicant considered sites in two alternative locations for the proposed development, near to the former RAF Wratting Common airfield and north of Silver Street. Chapter 3 also set out that being within close proximity to primary sources of feedstock and waste was critical to the Site selection. In response to the waste availability information required under Regulation 25, Appendix S demonstrates that within a 10-mile initial feedstock catchment radius, assuming total farming land use is given over to a single crop, it can be reasonably expected that there is potential for c.2,000,000t of maize, whole crop silage or grass. This is taking into consideration other relevant facilities in the surrounding area that would require similar feedstock.	addressing comments in this Reg 25 Addendum. Appendix S also provides an assessment of waste/feedstock availability and demonstrates there is sufficient resource to serve the Proposed Development which was one of the primary drivers. Nonetheless, this does not constitute a significance change and the basis for assessment of likely significant effects within the ES and this EIA Addendum also remains the same.	
Chapter 4 – Noise	Chapter 4, **Noise**, provides details on approach and methodology; baseline conditions; and assessment of effects. The noise assessment concluded that during the construction phase noise levels are significantly below the threshold value adopted for the assessment at the nearest noise sensitive receptor locations. This	**No change-** the cumulative effect assessment conducted as part of the Regulation 25 Addendum,	**No change-** No material changes within the cumulative assessment have been identified, and therefore, no amendments

Environmental Statement Chapter	Summary of ES content and further information provided as part of the Regulation 25 Request	Update to the Environmental Statement resulting from the Regulation 25 Request	Changes to magnitude/significance in the Environmental Statement
	includes residential and office/commercial properties (no known sensitive ecological or wildlife sites identified in the immediate area). During the operational phase, the magnitude of impact is likely to be negligible during the day but may be moderate in the worst case, during the night-time, at the nearest receptors and thus not significant. Chapter 4 also considered that the assessment of cumulative noise effects was not required, as no other local development proposals or changes in surrounding activity are known to be relevant at the time of writing. However, as part of this Regulation 25 EIA Addendum, an addendum to the Noise chapter has been provided to assess cumulative impacts (Appendix T) This addendum uses an additional supplementary methodology to calculate the propagation effects from noise sources associated with the cumulative development (cumulative sum of operational activities, and construction activities). It is concluded that the sum of the noise level from both developments remains at, or below the construction noise limits and therefore no significant effects have been identified and the assessment presented in Chapter 4 remains applicable.	concludes that the cumulative sum of noise levels from operational and construction activities remains at or below legislative noise limits. Therefore, there are not material difference to the outcomes reported in Chapter 4.	to magnitude of change or predicted significance of effects have been required.
Chapter 5 – Landscape and LVIA	Chapter 5, **Landscape,** provided details on the approach and methodology; baseline landscape conditions; baseline visual conditions; and the likely impact due to the proposed development.	**No update**- following a review of each of the points raised by Suffolk County Council's Landscape Team, a	**No change**- the review of Chapter 5 indicates that the conclusions made in the chapter are both maintained and supported

Environmental Statement Chapter	Summary of ES content and further information provided as part of the Regulation 25 Request	Update to the Environmental Statement resulting from the Regulation 25 Request	Changes to magnitude/significance in the Environmental Statement
	In response to the additional information required under Regulation 25, Acorn instructed a peer review of the Chapter by an independent landscape practitioner, who has provided a response to reach of the points raised by Suffolk County Council's Landscape team as summarised below: • **Requirement for landscape approach**: It is considered that landscape has been considered in the design process, and it is accepted that landscape cannot override all factors (like operational requirements). Although, landscape is mitigated by inherent landscape advantages of the Site. • **Landscape Mitigation**: This can be specified and secured by a suitable worded planning condition. • **Fencing**: The proposed fencing does have application in agricultural settings where enhanced security is required. In the case of the Site, this is consistent with the infrastructural character of the development and its urban fringe location • **Receptors east of the main Site:** The original conclusions of Chapter 5 regarding these receptors are supported and maintained. • **Woodland (by year 15)**: The cumulative impact of the woodland is considered to be beneficial, and the original conclusions of Chapter 5 are maintained. • **Open Views:** Whilst close-range views across the Site would be lost, this is due to mitigation planting rather than	response has been provided to each of the points raised, giving clarification and explanation. None of the points raised by SCC made specific requests for 'further environmental information' and therefore no updates have been made to Chapter 5.	by the independent practitioner, and therefore, although responses have been provided within this report to each of the points raised by SCC, no amendments to magnitude of change or predicted significance of effects have been required.

Environmental Statement Chapter	Summary of ES content and further information provided as part of the Regulation 25 Request	Update to the Environmental Statement resulting from the Regulation 25 Request	Changes to magnitude/significance in the Environmental Statement
	the development itself (and thus unavoidable). No further information is required, and the original conclusions of Chapter 5 are supported and maintained. • **Silver Street Visual Receptors (filtered views):** The filtered view effect only applies to one viewpoint, which constitutes a relatively discrete location. The submission of further information is not considered necessary, with the original conclusions of Chapter 5 not being affected. • **Reinforcement Planting:** Details of reinforcement planting can be specified and secured by a suitable worded planning condition. • **Western Boundary vegetation enhancement:** to remedy this issue, this can be specified and secured by a suitable worded planning condition. • **Reshaping and integration into the existing landscape:** Any changes to shaping is unlikely to result in any material changes to the effects reported in Chapter 5. • **Eastern woodland depth and view and vistas**: The current scheme is considered to provide a practicable balance between these considerations. • **Green Infrastructure (pipeline):** infrastructure along the pipeline route would have no physical impact and is not required to provide mitigation for the underground works. • **Operation hour maintenance and lighting requirement:** The occurrence of maintenance would only take place if		

Environmental Statement Chapter	Summary of ES content and further information provided as part of the Regulation 25 Request	Update to the Environmental Statement resulting from the Regulation 25 Request	Changes to magnitude/significance in the Environmental Statement
	urgent and it considered that lighting will not become a source of visual impact, nuisance, driver risk or ecological harm.		
Chapter 6 – Traffic	Chapter 6, **Traffic**, details information such as legislation and policy guidance; survey area and scope; methodology; baseline conditions; assessment of affects during construction; and assessment of effects during development. The chapter concluded that the proposals are acceptable in principle in terms of operational capacity and highway safety. Within the Regulation 25 request, the topic of highways was set out in three sections as summarised below: **Section 3 of Regulation 25 Request: Highways (Cambridgeshire County Council)** • **Inclusion of accident data from Cambridgeshire County Council**: Appendix G considers this data, and no significant patterns or trends have been observed that would be exacerbated by the Proposed Development (the Proposed Development would change the volume of traffic by less than 1%). • **Full trip generation assessment:** a full trip generation is not possible due to the lack of similar surveyed sites. Therefore, a first principles approach has been applied based on the processing and export volumes that are expected to be achieved.	**No update-** the Addendum has responded to the points raised in the Regulation 25 request and the relevant information has been supplied. An updated junction access design has been provided as part of this Addendum. However, no significant effects have been identified, nor any findings that would change the findings reported in Chapter 6 of the ES; therefore, no updates are required.	**No change-** following a review of the highway comments, no material changes been made to the scheme or the assessment undertaken in the ES. No amendments to magnitude of change or predicted significance of effects have therefore been required.

Environmental Statement Chapter	Summary of ES content and further information provided as part of the Regulation 25 Request	Update to the Environmental Statement resulting from the Regulation 25 Request	Changes to magnitude/significance in the Environmental Statement
	• **Outline of daily AM and PM peak generation figures for the busiest period:** This has been calculated in Figure 6-1 of Appendix G and the anticipated number of development-related peak hourly trips is equivalent to circa. 0.8-0.9% of traffic during the peak periods. This would have an imperceptible impact on the operation of the local highway network. • **Details of the distribution of trips to and from the site**: Expected AD suppliers (local farmers) currently generate a number of vehicle trips of which, a proportion of which these existing trips would involve the disposal of agricultural products and waste which would be redirected to the AD plant. Therefore, these movements would already exist on the local highway network, of which, depending upon the locations of the farms and end destinations, would already be using the A1307. **Section 4 of the Regulation 25 Request (Suffolk County Council)** • **Clarification on the proposed trips:** the Transport Addendum (Appendix G) states determining existing proportions of traffic already using the A1307 at this stage is difficult to predict accurately. However, in order to provide a particularly robust assessment, the junction capacity assessment of the proposed site access (detailed in Section 4) has not accounted for any 'netting off' of vehicle trips.		

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	• **Inclusion of non-HGV movements within the calculation of traffic movements:** the number of daily construction types (all vehicle trips) has been calculated and equates to 0.4% of the total daily traffic flow along the A1307 which is considered to be negligible • **Demonstration of how the proposed gas flare will not distract highway users:** the proposed flare location is circa. 220m from the highway; considering this distance combined with existing buildings and vegetation, it is unlikely the flare will have an impact. • **Further evidence that the proposed number of operation trips will not detrimentally affect the highway:** junction modelling undertaken in Appendix G and concludes that the proposed access arrangement design will have a negligible impact on the operation of the local highway network. • **Assessment of queue length for vehicles:** queue lengths for vehicles waiting to turn right into the site would be less than 1 vehicle during the peak periods and delays would be minimal • **Investigation into the appropriateness of a right turn into the site:** modelling undertaken in Appendix G concludes that it is unnecessary for a ghost right turn lane to be provided. On the basis that the junction modelling identifies there is no capacity constraint, it is considered that no provision of a right turn lane is acceptable.		

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	• **Modelling of peak traffic flows is required:** Junction capacity modelling has been undertaken for the site access and modelling identifies that there will be less than 1 vehicle queuing to turn right into the site access and therefore the proposed access arrangement design will have a negligible impact on the operation of the local highway network • **Clarification of the space require for parking/waiting/manoeuvring:** a maximum of 5 staff will be on-site at any one time and therefore there will be sufficient parking provision. The application site will also be managed such that the number of vehicles at any one time does not exceed the number of trailer bays • **Track Plans:** Swept path analysis has been undertaken demonstrating that a 16.5m articulated vehicle, the largest expected to require access to the Application Site, can readily access, egress and turn without excessive manoeuvring or safety concerns • **Formal pedestrian and cycle crossing:** a revised access design has been developed, which has given consideration to its interaction with the cycleway and is contained within Appendix A of the Transport Addendum which is appended to this document at Appendix G. • **Risk of queueing (safety audit):** it is concluded there is neither a risk of queueing or associated risks for users of the carriageway when considering the information within		

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	sections 3.0 (access appraisal), 4.0 (junction assessment) and 5.0 (internal layout). **Section 5 of the Regulation 25 Request (Suffolk County Council Planning)** • **Clarification on interaction with Application DC/23/0572/FUL**: There is no interaction with the proposed application at Silver Street. • **Removal of reference A43 within the Planning Statement:** The minor error in the PDAS has been amended, and now refers to the A1307. • **Justification for including a hard standing 'dog leg'**: access is to remain to enable direct harvest deliveries to site to reduce trips on the public highway. **Section 16 of the Regulation 25 Request (Cumulative Effects)** Motion have identified that there are no residual cumulative impacts in terms of highway safety or the operational capacity of the surrounding highway and transport networks (para 8.2 of Appendix G). The Addendum confirms the conclusions of the submitted ES. There will be no residual or cumulative impacts in terms of highway safety or the operational capacity of the surrounding highway and transport networks.		

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Chapter 7 – Air Quality	Chapter 7, **Air Quality**, provided information on approach and methodology; baseline conditions; and assessment. The chapter concluded that the construction period would result in a 'not significant' risk of impacts, and the operational period would result in a 'not significant' effect at human receptor locations. The scheme was also considered to cause 'no likely damage' to ecological receptors include the Over and Lawn Woods SSSI. Within the Regulation 25 request the topic of air quality was set out in three sections as summarised below: **Section 6 of Regulation 25 Request: Natural Environment** • **Clarity that the air quality assumptions are robust:** the response to Natural England (Appendix I) confirm that the assumptions in the air quality assessment are based of robust assumptions. • **Assessment for in combination effects and impacts on Over and Lawn Woods SSSI:** as part of this Regulation 25 Addendum, in-combination effects have been assessed by EarthCare Technical on behalf of the applicant (Appendix J). The Assessment included a search of planning applications, environmental permits, and the Development Plan to identify projects which should be considered as part of the in-combination assessment, with only was project of relevance identified (Streetly Hall AD plant). The assessment concluded that both alone and in-combination, the proposed development does not exceed 1% at the Over and Lawn Woods SSSI for ammonia, NDep	**No update**- following the Regulation 25 request, additional assessments have been undertaken relating to in-combination effects and cumulative impacts. However, no significant effects have been identified, nor any findings that would change the findings reported in Chapter 7 of the ES; therefore, no updates are required.	**No change-** No material changes within the in-combination or cumulative assessment have been identified, and therefore, no amendments to magnitude of change or predicted significance of effects have been required.

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	or AcidDep and therefore the conclusions made in Chapter 7 can be maintained. **Section 8 of Regulation 25 Request: Air Quality** **Requirement for pre-pandemic data**: • Section 4.2.4 of the submitted Air Quality ES chapter provides the mapped background concentrations of PM_{10} in the site locale, based upon the 2018 base year Defra update and projected to 2022 (calculated based on pre-pandemic information and is therefore considered to be representative). Irrespective, amending the PM_{10} value from the Defra maps to 2019, from 2022 results in an increase of 0.4 µg/m^3 ,which does not make a material difference to the conclusions of the assessment • **Considerations of track (up to 500m from the Site entrance):** The trackout distance used is based on latest IAQM construction dust guidance (Version 2.2, January 2024). Irrespective of this, assessing using the maximum 250m trackout distance (as per the latest IAQM dust guidance) would not change the conclusions of the assessment as there are also no additional human receptors situated within 50m of the route used by construction vehicles on the public highway up to 250 m from the site entrance(s). • **Update to the Institute of Air Quality Management guidance:** the changes within the new guidance do not change the aspects of magnitude or sensitivity associated		

Environmental Statement Chapter	Summary of ES content and further information provided as part of the Regulation 25 Request	Update to the Environmental Statement resulting from the Regulation 25 Request	Changes to magnitude/significance in the Environmental Statement
	with the proposed development/receptors and therefore the conclusions remain valid. **Section 10 of Regulation 25 Request: Cumulative Impacts** As part of the Regulation 25 request, an addendum that assesses cumulative air quality impacts has been provided (Appendix U), which has had consideration to human health receptors, odours, ecological receptors. The assessment concluded: • a 'not significant' impact at human receptor locations would be observed; and • impacts at ecological receptors are considered to cause 'no likely damage' to the Over and Lawn Woods SSSI and 'no significant pollution' at the Hare Wood Ancient Woodland.		
Chapter 8 – Ecology	Chapter 8, **Ecology**, provided details on the approach and methodology; baseline ecological conditions; baseline visual conditions; assessment of effects; mitigation and compensation and residual effects. The chapter concluded that within the mitigation and compensation measures proposed (such as the construction environmental management plan), no residual impacts are anticipated on the identified ecological receptors a As part of the Regulation 25 request, additional ecology related information was requested with respect to water vole/otter surveys and the biodiversity net gain assessment. A summary of the applicant's response is provided below:	**No update-** following the Regulation 25 request, additional surveys and assessments have been undertaken relating to riparian mammals and updates to the BNG, as outlined in this document. However, no significant effects have been identified, nor any findings that would	**No change**- following the update to the BNG assessment, the scheme will remain to meet the statutory BNG requirements, with no amendments to magnitude of change or predicted significance of effects have been required.

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	• **Requirement for water vole and otter surveys of nearby watercourses**: The watercourses surveyed for assessment of suitability for riparian mammals (as set out in Chapter 8) include two ditches and a section of Stour Brook running along the southern boundary of the site. An additional survey of these watercourses was undertaken on the 11/04/2024, with no evidence of water vole or otter was identified; the areas assessed are dry for most of the year and considered to have negligible potential to support riparian mammals. Therefore, it is considered this requirement (surveys) has been met. • **The need to include consideration of bordering hedgerows and watercourses in the BNG assessment**: The BNG assessment (Appendix 2 of ES Chapter 8) has been updated and appended to this document in Appendix O to address the concerns over the inclusion of linear watercourse habitats, using the Statutory Biodiversity Metric for completeness. Feasible enhancement /management measures were tested to raise the conditions to fairly good and moderate respectively which would translate to a 17.83% net gain in linear river units. The enhancements would be included within an Ecological Management Plan which can be secured by a suitably worded condition.	change the findings reported in Chapter 8 of the ES; therefore, no updates are required.	
Chapter 9 – Land Quality	Chapter 9, **Land Quality**, provided details on the approach and methodology; baseline conditions; mitigation measures; and	**No update**- It is proposed that the	**No change-** No changes have been made to

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	assessment of effects. The chapter concluded that the proposed development would have a negligible impact on human health, soil and controlled waters during the occupation phase. **Section 12 of Regulation 25 Request: Land Quality** The West Suffolk Council EHO requested that the disused used railway is included within the ground investigation report (Appendix Q). It is considered that this could rather be addressed through the implementation of a watching brief. Should contamination be encountered then it could be dealt with as road construction works are undertaken.	concerns relating to contamination from the disused railway could be addressed through a watching brief and appropriate provision of PPE during construction. Therefore, no changes have been made to Chapter 9 of the ES.	Chapter 9 as a result of this Regulation 25 request and therefore, no amendments to magnitude of change or predicted significance of effects have been required.
Chapter 10 – Hydrology and Hydrogeology	Chapter 10, **Hydrology and Hydrogeology**, provided details on approach and methodology; baseline conditions; incorporated mitigation; and assessment of effects. Flood Risk was also considered separately within an FRA which is appended to the chapter. Overall, the assessment found that following the implementation of the proposed mitigation measures (including a surface water drainage strategy), effects are considered Negligible or Minor for the construction and operational phases. Within the Reg 25 request the topic of surface water was set out in two sections as summarised below: **Section 1 of Regulation 25 Request: Surface Water Drainage (LLFA and West Suffolk Council)** A design team meeting on the 4th January was held between the SCC water drainage engineer, SLR Consulting, GGP and Acorn	**No update-** whilst the Drainage Strategy has been updated, the SuDS and associated drawings have been amended following advice, however, no significant effects have been identified, nor any findings that would change the findings reported in Chapter 10 of the ES. The sequential test also demonstrated that there	**No change-** No material changes within the amended SuDs scheme that would change the findings presented within Chapter 10 and therefore, no amendments to magnitude of change or predicted significance of effects have been required.

Environmental Statement Chapter	Summary of ES content and further information provided as part of the Regulation 25 Request	Update to the Environmental Statement resulting from the Regulation 25 Request	Changes to magnitude/significance in the Environmental Statement
	Bioenergy Ltd whereby the below Regulation 25 points were discussed and agreed (as set out in Appendix C appended to this document). • **Submission of surface water drainage strategy and update drainage layout:** Following that submitted in the planning application submission, it is now recommended that the SuDS source control and conveyance features are not adopted on the site due to the likelihood of contamination. Instead, channel drains and underground pipes are used to intercept and convey runoff across the site; this is considered available option for the management of water quantity. Rainwater harvesting is also proposed as per the Flood Risk Assessment (August 2023) which accompanied the application. Additionally, the AD plant will operate under an Environmental Permit to ensure compliance and protection of the local receptors. Overall, although SUDs features have not been adopted, the proposed surface water drainage system shall conform and be regulated to a robust, audited & recorded operational & maintenance plan. Accordingly, the conclusions made in Chapter 10 are maintained. • **Detailed SuDS drawings and a contour plan, exceedance routes and impermeable area drawings within the drainage strategy**: As discussed in the design team meeting, detailed SuDS drawings were included in Appendix A1 of Chapter 10, however, Drawing SW2: Surface Water Drainage Strategy has been amended to include exceedance routes (see Appendix C). It should also	aren't any reasonably available and appropriate sites for the proposed development with a lower probability of flooding; therefore no updates are required.	

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	be noted that Proposed Site levels are shown in drawing GGP-29351-P-110-F-Site Levels-Sheet 1 of 2 and 2 of 2 which accompanied the planning application submission. • **Remove the calculations with discharge rates and climate changes which are not being used**: Following the design team meeting, as agreed, the calculations presented in Appendices 5 and 6 of the submitted FRA and SWDS remain valid and have not been removed. • **The calculations needs to be modelled as a network rather than a source control:** MicroDrainage Source Control calculations have been supplied that describe the cascade model to address this point (MicroDrainage network model simulation calculations are technically challenging and not possible with a non-standard rainfall profile). • **Sequential Test:** A sequential test has been undertaken (see Appendix D). The Sequential Test followed a staged approach and has adequately demonstrated that there are no reasonably available and appropriate sites for the proposed development with a lower probability of flooding that would be appropriate for the type of development proposed. **Section 2 of Regulation 25 Request: Surface Water Drainage (Environmental Agency)** A meeting on the 27th November 2024 was held between the Environmental Agency, SCC SLR Consulting, GGP and Acorn		

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	Bioenergy Ltd whereby points a) and b) of Topic 2 (Surface Water Drainage) were discussed and agreed (as set out in Appendix E appended to this document). • **Impacts from nearby watercourse:** the submitted FRA (August 2023) assessed flood risk which includes anticipated impacts from nearby watercourses. The FRA concluded that all impacts of the development had been investigated and successfully mitigated and incorporated into the scheme proposals presented as part of the planning submission. • **Climate change allowances**: Clarification is presented in Appendix E, which explains that the development lifetime of the project is 25 years which is considered in Table 7-1 of the FRA, with an 8% climate change allowance adopted. The climate change figures in the FRA have been accepted as correct by the environmental agency. • **Points g) to i) within Section 2 of Regulation 25 Request:** see Appendix F (letter from GGP).		
Chapter 11 – Historic Environment	*Not subject of Reg 25 request – no updates required nor have any changes to the frequency and magnitude of the findings reported in Chapter 11 incurred.*		
Chapter 12 – Other	Chapter 12 of the ES, **Other Environmental Effects**, discusses land use and land take, economy and employment, risk of accidents, climate change and cumulative effects.	**No update**- further information is provided with respect to how the	**No change**- There are no amendments to magnitude of change or predicted

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Environmental Effects	**Section 17 of Regulation 25 Request: Risk of Accidents** The submission is accompanied by an Environmental Permit Statement by Acorn Bioenergy (see Appendix V). The statement sets out how the Site will prevent the risk of accidents and concludes that the principal control measure for prevention of harm to human health or causing pollution in the local environment is to physically design the Site in a way that prevents the risk of harm wherever possible, or in such a way that potential impact is reduced to acceptably small levels. **Section 1 and 2 of Regulation 25 Request: Surface Water Drainage** With respect to climate change vulnerability, Appendix C (technical memorandum in response to the LLFA) affirms that the discharge rates and climate change calculations used in the submitted FRA & SWDS are correct. This was agreed in a meeting held on the 4th January 2024, between a water drainage engineer from SCC, SLR Consulting, GGP and Acorn Bioenergy Ltd. Additionally, Appendix E providers clarification on the climate change allowances associated with the Proposed Development, which explains that the development lifetime of the project is 25 years which is considered in Table 7-1 of the FRA, with an 8% climate change allowance adopted. The climate change figures in the FRA have been accepted as correct by the environmental agency.	risk of accidents will be mitigated, clarifications on climate change figures used in the FRA and SWDS and cumulative effects. However, the conclusion that such risks would be low as per Chapter 12 remains valid.	significance of effects reported in the ES and as a result no consequential changes have been required within Chapter 12.

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	Section 16 Regulation 25 Request: Cumulative Effects • **Noise**: The Noise Addendum Report (Appendix T) assesses cumulative impacts with respect to the proposed development at Land at Streetly Hall Farm, using an additional supplementary methodology to calculate the propagation effects from noise sources associated with the cumulative development (cumulative sum of operational activities, and construction activities). It is concluded that the sum of the noise level from both developments remains at, or below the construction noise limits. • **Air Quality and Odour:** The Air Quality and Odour Report (Appendix U) assesses cumulative air quality impacts, which has had consideration to human health receptors, odours, ecological receptors. The assessment concluded a 'not significant' impact at human receptor locations would be observed and impacts at ecological receptors are considered to cause 'no likely damage' to the Over and Lawn Woods SSSI and 'no significant pollution' at the Hare Wood Ancient Woodland. • **Transport:** The Transport Addendum (Appendix G) states 'there are no residual cumulative impacts in terms of highway safety or the operational capacity of the surrounding highway and transport networks'. **Section 7 Regulation 25 Request: Climate Change** Appendices L and M provide an assessment of the carbon intensity information and supporting evidence of the Proposed		

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	Development. The Appendices supports the conclusions made with the carbon assessment supporting the application and considers the carbon figures provided by the applicant are suitable and backed by strong and well justified evidence. The carbon calculation for the Proposed Development and concludes that over a 25-year period the Proposed Development will deliver total 'Cradle-to-Grave' emissions savings of 764,835 tonnes of CO2e.		
Chapter 13 – Conclusion	Chapter 13 of the ES, the **Conclusion**, summarises the findings of the ES and concludes that the proposed development would provide a range of environmental benefits and could proceed in a way which minimises environmental effects, and the effects from operations could be maintained within acceptable limits. It also states that the conclusions of the technical assessments which support the proposed development find that, subject to the mitigation measures identified in the assessments, the proposed development could operate with no significant adverse impacts on environment. The updates made within this Regulation 25 request to not change the significance of any effects and therefore this conclusion made is maintained.	**No update**- as part of this Regulation 25 Addendum, no material changes have been made to the proposed development or the assessment of effects set out in the ES and therefore the conclusions set out in Chapter 13 remain the same.	**No change**- There are no amendments to magnitude of change or predicted significance of effects reported in the ES and as a result no consequential changes have been required within Chapter 13.
Non-Technical Summary	The **Non-Technical Summary** (NTS) provides a high-level non-technical language overview of the main findings contained within the ES.	**No update** – as part of this Regulation 25 Addendum, no material changes have been made to the proposed	**No change**- The NTS does not assess frequency/magnitude (its purpose is to provide a non technical description of the

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		development or the assessment of effects that would change that reported in the NTS. However, for ease, clarifications/additional work conducted in this Regulation 25 response have been highlighted in a revised NTS contained within Appendix B.	project). Therefore, there are no changes in frequency/magnitude.

Appendix A Copy of SCC Regulation 25 Request

Appendix B Revised Non-Technical Summary

Appendix C Response to LLFA Technical Memorandum

Appendix D Flood Risk Sequential Test

Appendix E Environment Agency (Hydrology) Response

Appendix F Environment Agency (Design) Response (prepared by GGP Consult)

Appendix G Transport Addendum (prepared by Motion)

Appendix H Updated Planning Design & Access Statement

Appendix I Natural England Response

Appendix J In-Combination Ammonia Impact Assessement (prepared by Earthcare Technical)

Appendix K Nutrient Management Plan (prepared by Earthcare Technical)

Appendix L Carbon Calculator (prepared by Acorn Bioenergy)

Appendix M Carbon Lifecycle Assessment (prepared by Brown & Co)

Appendix N Riparian Mammals Survey (April 2024)

Appendix O Revised Biodiversity Net Gain Metric

Appendix P Site Fencing Layout and Detail (prepared by GGP Consult)

Appendix Q Ground Investigation Report (Phase 2)

Appendix R Updated Statement of Community Involvement (prepared by Instinctif)

Appendix S Feedstock (Waste Availability) Response (prepared by Acorn Bioenergy Limited)

Appendix T Noise (Cumulative Impact) Addendum Response

Appendix U Air Quality (Cumulative Impact) Addendum Response

Appendix V Environmental Permit Statement (prepared by Acorn Bioenergy Limited)