ENVIRONMENTAL STATEMENT NON-TECHNICAL SUMMARY

Proposed Anaerobic Digester and Associated Grain Store, Whitwick Manor, Herefordshire

STL Energy Limited

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Document History:

Version	Issue date	Author	Checked	Description
1.0	10/08/2022	DY	DY	Draft.
1.1	11/08/2022	DY	DY	Submitted with planning application.
1.2	09/09/2022	DY	DY	Updated to include cost for provision of additional copies of Environmental Statement.
1.3	03/10/2024	DY	DY	Updated to include summary of changes to application and revised/additional documents submitted since original application submission.
1.4	04/10/2024	DY	DY	Submitted to Local Planning Authority.
1.5	04/10/2024	DY	DY	Amendment to Table 1.
1.6	07/03/2025	DY	DY	Updated to include references to updated air emissions modelling assessment, shadow Habitats Regulations Assessment and documentation on reed bed performance. Amendment to Table 1.
1.7	14/08/2025	DY	DY	Amendment to Table 1 and 2. Minor amendments to process descriptions.
1.8	13/05/2026	DY	DY/BVA	Updated for appeal submission.
1.9	27/05/2026	DY	DY/BVA	Amendment to Table 1.

1 Introduction

1.1 Overview

1.1.1 An Environmental Statement has been prepared in support of proposals for development of an Anaerobic Digestion plant and associated grain drying operation at Whitwick Manor, Herefordshire. This has been prepared in order to assess potential impacts on air, land, water and local economy associated with the proposed development. This Non-Technical summary summarises the findings and conclusions of the Environment Statement in non-technical language.

1.1.2 The planning application for these proposals was submitted to Herefordshire Council. The application has since been refused by Herefordshire Council and an appeal against the decision has been submitted by the applicant.

1.1.3 This Non-Technical Summary has been updated to reflect the extant submission documents.

1.1.4 Where potential adverse impacts have been identified, mitigation measures have been incorporated into the scheme in order to control impacts to an acceptable/negligible level.

1.1.5 It is important to note that an Environmental Permit has been issued by the Environment Agency for the proposed operation, providing confirmation that sufficient mitigation has been built into the scheme to ensure that impacts from residual emissions to air, land and water will be insignificant at relevant human and ecological receptors, including the River Wye Special Area of Conservation and River Lugg Site of Special Scientific Interest.

1.1.6 There will be multiple beneficial impacts achieved by the scheme, which will provide a more sustainable outlet for local waste arisings with extensive environmental improvements achieved locally. The benefits of the scheme have been examined in detail within separate submissions as part of this application.

1.1.7 Since the submission of the original application and following discussions with relevant consultees, revisions were made to the scheme and documents/drawings revised. The revisions were addressed within subsequent submissions to Herefordshire Council and this Non-Technical Summary has been updated accordingly. In order to ensure the principal changes since the original submission are clearly documented, the table overleaf provides a summary of revisions made to the scheme and details of environmental assessments updated/submitted, including document references for the extant versions of each document. This has been undertaken in order that members of the public are aware of extant plans and documents which make up the submission.

Table 1 – Revisions to Scheme and Updated/Additional Assessments Since Original Application Submission

Scheme Revision/Assessment Amendment/Additional Assessments	Document/Drawing Title and Reference(s)
Full enclosure of poultry manure storage within negative pressure building. Air to be directed to scrubber system supplemented by carbon filters for ammonia and odour abatement with residual, abated air to be used for cooling of the CHP systems.	Drawing No. 01113-00 sheet 02 revision F – Site Plan Drawing No. 01113-00 sheet 04 revision F – Site Plan Drawing No. 01113-00 sheet 07 revision F – Elevations Drawing No. 01113-04 sheet 01 revision D – Storage Clamps Plan Drawing No. 01113-04 sheet 02 revision D – Storage Clamps Elevations Drawing No. 01113-20 sheet 01 revision B – CHP Plans
Reduction in height of grain store and poultry manure storage building.	Drawing No. 01113-01 sheet 01 revision F – Grain Store Drawing No. 01113-04 sheet 02 revision D – Storage Clamps Elevations
Response to Regulation 25 Notice.	Document Ref: 2102-003-G, Version 1.2
Revised Landscape and Visual Impact Assessment.	Appendix II of Document Ref: 2102-003-G
First addendum to Landscape and Visual Impact Assessment, including revised landscaping scheme, soft landscaping schedule and Access Masterplan.	Addendum to Landscape and Visual Impact Assessment, Version 2, February 2024
Second addendum to Landscape and Visual Impact Assessment, including proposal for additional mitigation including landscape bund, assessment of additional viewpoints, amendment of photomontages accordingly to ensure consistency and addressing consultation comments.	Landscape Statement to Review the Landscape Proposals at Whitwick Manor, Hereford, and Enhance their Effectiveness (Document ref: 22419)
Response to consultation comments submitted by Jeffrey Hughes in relation to a viewpoint to the South of the Site.	Document ref: 22419 – Whitwick Manor – A Response to the Document from Jeffrey Hughes by Illman Young Landscape Design Limited, 2nd October 2025
Analysis of views in response to document produced by Mr Hughes.	Document ref: 22419 - Analysis of views in response to document produced by Mr Hughes for works at Whitwick Manor, Illman Young Landscape Design Limited, September 2025
Updated Emissions Modelling Assessment to take account of pollution deposition at River Wye SAC and updated critical levels and loads for nitrogen and acid deposition since original submission. Also includes assessment of potential in-combination impacts from air emissions, revised abatement strategy for poultry manure storage building and relocation of poultry manure feed hoppers to manure storage building. Inclusion of scrubber efficiency test data.	Document Ref: 2102-003-D, Version 1.13, May 2026
Revised Noise Impact Assessment to take account of the inclusion of scrubbers.	Document Ref: NP-013997, Nova Acoustics, May 2026
Applicant response/rebuttal to Council HRA and consultation comments raised by Campaign to Protect Rural England in relation to aerial emissions.	Document Ref: 2102-STL-CR1

Scheme Revision/Assessment Amendment/Additional Assessments	Document/Drawing Title and Reference(s)
Revision to Archaeology and Cultural Heritage Assessment, including results from Geophysical Survey and agreed scheme of trial trenching.	Appendix V of Document Ref: 2102-003-G
Updated Flood Risk Assessment and Drainage Strategy.	Appendix VI of Document Ref: 2102-003-G
Details of phosphate recovery process.	Appendix VII of Document Ref: 2102-003-G
Phosphate Mitigation Plan	Appendix IX of Document Ref: 2102-003-G
Proposed laboratory testing schedule for water discharges.	Appendix X of Document Ref: 2102-003-G
Letters of interest for grain supply.	Appendix XI of Document Ref: 2102-003-G
Detailed Drainage Strategy	Appendix XII of Document Ref: 2102-003-G
Ecological mitigation for Skylarks, hedgerows and on-site pond.	Appendix XIII of Document Ref: 2102-003-G
Updated Biodiversity Net Gain Assessment based on revisions to proposed landscaping scheme.	Document Ref: UES02996/12
Revision to Transport Statement to include revised access design, Stage 1 Safety Audit of revised access, amendments to vehicle types and provision of Traffic Management Plan.	Document Ref: LB/220042/TS/13 – Transport Statement, Rev 13, January 2024
Revised Arboricultural Impact Assessment, addressing proposed changes to site access.	Document Ref: 118/R/200, Version 2, January 2024
Tree Constraints Report	Document Ref: 118/R/100, Version 2, January 2024
Shadow Habitats Regulations Assessment	Document Ref: UES02996/04, Version 6, 10th August 2025
Examination of Planning Benefits	Document Ref: 01113-00, Issue 1, dated 4th October 2024
Review of Disbenefits and Rebuttal to the Council's HRA	Document Ref: 01113-00, Issue 1, dated 4th October 2024
Method for Site Selection for In-Combination Assessment of Aerial Emissions.	Document Ref: 01113-02, Issue 2, dated 23rd January 2025
Letter from CQA outlining performance of proposed reed beds and phosphorous removal.	Document ref: 30591, dated 17th February 2025
Letter from CQA on Aerial Emissions from Reed Beds.	Document ref: 30591, dated 12th December 2024
Letter from Exeon, including demonstration of design for negative pressure and abatement on poultry manure storage building.	Document ref: 2102-003-EXEON
Downstream Effects Document	Document ref 01113-00, dated 20th May 2026
Sustainability Document	Document ref: 01113-00, dated 21st May 2026

Scheme Revision/Assessment Amendment/Additional Assessments	Document/Drawing Title and Reference(s)
Updated/Additional Drawings reflecting the changes to the scheme.	Drawing No. 01113-00 sheet 02 revision F – Site Plan Drawing No. 01113-00 sheet 04 revision F – Site Plan Drawing No. 01113-00 sheet 06 revision E - Elevations Drawing No. 01113-00 sheet 07 revision F – Elevations Drawing No. 01113-00 sheet 08 revision E - Sections Drawing No. 01113-00 sheet 09 revision E – Sections Drawing No. 01113-00 sheet 14 revision E – Agricultural Land Use Drawing No. 01113-00 sheet 15 revision E – Proposed Land Use Drawing No. 01113-01 sheet 01 revision F – Grain Store Drawing No. 01113-04 sheet 01 revision D – Storage Clamps Plan Drawing No. 01113-04 sheet 02 revision D – Storage Clamps Elevations Drawing No. 01113-20 sheet 01 revision B – CHP Plans Drawing No. 2102-003-02 Revision A - Water Features Plan Drawing No. C2453_100_P6 – Drainage Masterplan Drawing No. C2453_101_P6 – Drainage Layout Sheet 1 Drawing No. C2453_102_P6 - Drainage Layout Sheet 2 Drawing No. C2453_103_P6 - Drainage Layout Sheet 3 Drawing No. C2453_104_P6 - Drainage Layout Sheet 4 Drawing No. 2102-003-03 revision D – Site Drainage Plan

1.2 Site Description

1.2.1 The centre of the site is located at approximate National Grid Reference 360660, 245744 and is located off the A417. Reference should be made to Appendix I for a Site Location Plan showing the extent of the proposed red line planning boundary.

1.2.2 The proposed site is currently in agricultural use and is bounded and defined as follows:

- To the North and North-East lies the A417 with agricultural land beyond;
- To the East lies agricultural land with the A417 beyond; and,
- To the South and West lies agricultural land.

1.3 Benefits of Proposals

1.3.1 The proposals will include the following numerous benefits:

- Management of waste higher up the waste hierarchy;
- Generation of renewable energy through export of gas to grid;
- Contribution to reduction in greenhouse gas emissions;
- Production of a digestate product which will be used as a substitute for fertiliser, creating beneficial environmental impacts;
- Reduction in use of fossil fuels, that would otherwise be used to manufacture fertiliser;
- More sustainable solution for management of local poultry manure arisings;
- Provision of centralised facility for drying of grain, using renewable energy sources;
- Capture of carbon dioxide emissions for the production of dry ice;
- Extensive clean up of process water, ensuring clean water is returned to land;
- Installation of photovoltaic panels to generate renewable energy; and,
- Generation of four full time jobs during operations.

2 Description of Proposals

2.1 Layout Plan

2.1.1 A layout plan showing the site once fully developed is included within Appendix I.

2.2 Construction Phase

2.2.1 The construction phase will be short term and temporary, lasting for up to 18 months and will include site preparation works and construction of all the structures and services required to support the operation, as shown on the layout plan.

2.2.2 Up to 5,368 Heavy Goods Vehicle movements will be generated during the course of the construction works, which when averaged, works out at 14.71 movements per day. In addition, 20 car movements and 4 van movements per day are anticipated, associated with construction staff and contractors.

2.2.3 The following provides a breakdown of employment generation associated with the construction phase:

- Ground works and site preparation - 10 people;
- Grain store construction works - 5 people; and,
- AD Plant construction works- 15 people

2.3 Operational Phase

2.3.1 The following sections provides a description of the proposed operations.

Anaerobic Digestion Process

2.3.2 Anaerobic Digestion is a biological process, which breaks down organic matter within agricultural feedstocks/products in the absence of oxygen, through the actions of a variety of micro-organisms. This produces usable products, including biogas, which can be upgraded and exported to the grid and digestate, which can be

used as a more sustainable substitute for traditional fertilisers. The process design has been specifically engineered to ensure all outputs from the process are either captured and re-used or rendered benign to the environment. Specifically, the following feedstocks will be used as inputs to the process:

- 100,000 tonnes/annum of poultry manure from local farming operations;
- 35,000 tonnes/annum of digestate;
- 25,000 tonnes/annum of liquid feedstocks from agricultural and drinks industry processes; and,
- 16,000 tonnes/annum of apple pomace.

Feedstocks and Reception

2.3.3 All feedstocks will be received over a weighbridge. The poultry manure will be stored within an enclosed building maintained under negative pressure to minimise air emissions and eliminate leachate from rain. Exhaust air from the building will be directed to a scrubber system with additional carbon filters for abatement of ammonia and odour, with residual, abated air to be used for cooling of the Combined Heat and Power Units. Solid feedstocks other than poultry manure will be stored within a designated storage clamp. The storage clamp will have the capacity to store approximately 2 months' worth of material when running at full capacity. Any liquid residues and/or recirculation water from the end of the process will be stored in one of the large tanks ready for feeding hourly into the pre-treatment process.

Feeders

2.3.4 There will be 4 walking floor feeders. These will be filled twice a day, morning and evening, introducing material to the process.

Pre-Treatment

2.3.5 There will be three hydrolysis/pasteurisation tanks, to allow for the feedstocks to be pre-processed by hydrolysis, pasteurisation and de-ammonification. A significant proportion of ammonia will be removed before the digestion process to prevent the Nitrogen from inhibiting the digestion process and to extract Nitrogen into a concentrated Ammonium Sulphate solution which can be sold as a fertiliser. An Ammonium Sulphate storage tank will be included.

Anaerobic Digestion

2.3.6 The pre-treated material will be pumped into 4 primary digesters and then into two secondary digesters, which will be used to digest the material, evolving biogas. The resultant biogas will be around 55% methane and 45% carbon dioxide and will be piped via desulphurisation units for use in the Combined Heat and Power units and biomethane plant. A digestate product will also be produced, which will be subject to subsequent processes for separation and nutrient recovery.

Nutrient Recovery

2.3.7 The digestate overflow from the tanks will be treated to extract nutrients in a multi-stage process where the majority of the remaining Nitrogen, Phosphates and Potassium are removed. These processes collect the nutrients in a concentrated form including Ammonium Sulphate and Calcium Phosphate, which can be easily transported and then applied as available fertilisers where and when required.

Digestate Separation

2.3.8 The low nutrient digestate will then be separated with screw presses and/or decanter centrifuges into a benign solid soil improver and a liquid stream. The liquid stream will still be around 1% solids at that point, so will require further processing through a reverse osmosis membrane/ion exchange plant to create a liquid stream

suitable for re-circulation or final cleaning using a natural filtration process in a reed bed before discharge.

Reed Bed and Buffer Lagoons

2.3.9 A reed bed system will be included which further cleans the water. A buffer storage lagoon has been provided for to allow for maintenance and process control. A second lagoon has also been provided for to capture rain from the site which can be used in the anaerobic digestion process or discharged to the local ditch network.

Biomethane Plant

2.3.10 Carbon dioxide and methane within the biogas will be separated and methane then subject to cleaning and upgrading prior to being exported to the gas grid.

Dry Ice Production

2.3.11 The carbon dioxide gas stream will be converted to dry ice which can be used as a sustainable alternative in the food and drinks manufacturing industry.

Combined Heat and Power Units

2.3.12 Some of the biogas is to be used directly in two combined heat and power units which will be provided to supply power to the plant as well as the farm and grain store. In addition to the green electricity generated, the units will generate heat which will be used to heat the digestion tanks, pre-treatment and nutrient recovery processes and also to dry grain within the grain store.

Backup Boilers

2.3.13 Two backup boilers which can run on biogas will be provided for periods of extreme weather or when a combined heat and power unit is taken off-line for servicing to allow the plant to maintain its operating temperature.

Flare

2.3.14 A dual stream flare is to be installed to allow either excess biogas or reject biomethane to be burned at a high temperature so as to prevent any methane emissions. In practice, it is anticipated that this will be used rarely, such as during maintenance of equipment or for a few minutes when the biomethane is adjusted prior to injection into the grid.

Grain Store

2.3.15 A grain store will be constructed, which will be used to store and dry grain from local farming operations in a sustainable manner, using heat from the combined heat and power units.

Vehicle Movements

2.3.16 The following table outlines the traffic movements associated with the development.

Table 1 – Vehicle Movements Generated by Development (Inclusive of Arrivals and Departures)

Activity	Heavy Goods Vehicles (29 Tonne)	Heavy Goods Vehicles (28 Tonne Tanker)	Heavy Goods Vehicles (20 Tonne)	Tractor/Trailer (16 Tonne)	Light Duty Vehicles (Vans/Cars)
	Movements Per Annum				
Grain Import	510			924	
Grain Export	1070				
Poultry Manure import	6897				
Apple Pomace Import	1102				
Liquid Feedstocks Import	2412				
Extra Liquids Required	1724				
Solid Fertiliser Export	3444				
Liquid Fertiliser Export	2424				
Dry Ice Export			946		
Propane Import			70		
Sulphuric Acid Import		679			
Magnesium Chloride Import	50				
Organic Chloride Import	92				
Ferrous Chloride Import	13				
Site Staff					2920
Visitors					1460
LGV Deliveries					1460
Washdown Water Export		24			

Employment

2.3.17 The proposals will generate four full time jobs.

2.4 Environmental Regulation

2.4.1 An Environmental Permit is required for the operation, which will be regulated on a continual basis by the Environment Agency, who will undertake regular compliance inspections to ensure the site operator is complying with stringent permit conditions so designed to protect air, land and water and human health/amenity. The Environmental Permit was issued by the Environment Agency on 1st August 2024

and further varied by the Environment Agency on 11th June 2025, confirming that the Environment Agency are satisfied that sufficient mitigation has been built into the scheme to adequately control potential impacts on air, land and water, including human and ecological receptors. It is important to note that given the significant importance of the scheme, the Environment Agency agreed to fast track the permit application, stating the following:

"Having reviewed your request to prioritise work on your application we are satisfied your development will help maintain national resilience, national infrastructure and/or is critical for environmental protection."

2.5 Carbon Credentials

2.5.1 Calculations have been undertaken by the technical specialist for the project to estimate the carbon footprint of the development. These have taken account of the carbon footprint of the construction works including materials required and the significant carbon savings that will be achieved by the development as a result of generation of renewable energy. In summary, it is estimated that carbon payback will be achieved within a period of 6.8 months of commencement of operations, achieved by the major carbon savings that the development will achieve. Following this period, significant year on year carbon savings will be achieved by the development, compared to the alternative situation, were the development not to proceed.

2.6 Consideration of Reasonable Alternatives

2.6.1 The main alternative options to the proposed development are as follows:

- 'Do nothing';
- Alternative options for use of feedstocks; and,
- Use of alternative sites.

'Do Nothing' Scenario

2.6.2 The proposal will introduce the following benefits, which would not be realised, were the development not to proceed (do nothing scenario):

- Management of waste higher up the waste hierarchy;
- Generation of renewable energy through export of gas to grid;
- Contribution to reduction in greenhouse gas emissions;
- Production of a digestate product which will be used as a substitute for fertiliser, creating beneficial environmental impacts;
- Reduction in use of fossil fuels, that would otherwise be used to manufacture fertiliser;
- More sustainable solution for management of local poultry manure arisings;
- Provision of centralised facility for drying of grain, using renewable energy sources;
- Capture of carbon dioxide emissions for the production of dry ice;
- Extensive clean up of process water, ensuring clean water is returned to land;
- Installation of photovoltaic panels to generate renewable energy; and,
- Generation of four full time jobs.

2.6.3 Given the above significant benefits, the do-nothing scenario is not considered a suitable alternative option.

2.7 Alternative Options for Feedstocks

2.7.1 The plant will import poultry manure and agriculturally based liquid wastes and apple pomace from local sources. The poultry manure is currently spread to land untreated. Alterative options for the manure are to continue land spreading, to utilise in a local recovery scheme such as the proposed anaerobic digestion plant, or to transport over several miles to a suitably authorised facility for incineration.

2.7.2 The proposals will provide a more sustainable outlet for the manure compared to the existing situation where it is spread on land, producing a valuable fertiliser and a system for collection of carbon dioxide for the production of dry ice with cleaned water returned to the local watercourse after extensive stripping and cleaning to remove phosphate and nitrates. At the same time, heat will be recovered for drying grain at a centralised facility and gas exported to the grid. This will introduce significant environmental benefits compared to the spreading of manure to land. Furthermore, the transportation of the manure over several miles for incineration is less sustainable and furthermore has greater potential for environmental impact. Therefore, the alternative uses for the feedstocks are not considered a viable alternative.

2.7.3 It is also important to observe that the proposed plant has been designed to utilise the proposed feedstocks. There is no intention to utilise maize, nor was this considered as a principal or supplementary feedstock and it has been advised that the plant could not be readily modified to utilise this feedstock.

Consideration of Alternative Sites

2.7.4 There are a number of practical and environmental advantages to locating the facility at the proposed site compared to other sites under the control of the applicant as follows:

- The site is adjacent to the A417 and close to junctions with A465 and with A4103, thus providing easy access to strategic road network;
- No rights of way on the site;
- Residential properties are more distant from the proposed site than from other potentially suitable sites under the applicant's control;
- Existing vegetation belt provides visual screening from East and North-East and few viewpoints and receptors from other directions;
- Relatively distant from main rivers;
- Low flood risk;

- The site is distant from statutory ecological designations; and,
- Proximity to gas main, to facilitate export of gas generated at the site. The ability to make a connection for export at a reasonable infrastructure cost is important to make the construction of an anaerobic digestion plant viable.

3 Environmental Impact Assessment

3.1 Overview

3.1.1 The following sections summarise the main conclusions of the Environmental Impact Assessment. The content of the Environmental Statement was scoped and agreed with Herefordshire Council.

3.2 Land Use

3.2.1 An assessment has been undertaken of the potential impacts on surrounding land use, both present and future uses.

3.2.2 A baseline assessment has been undertaken to assess landuses within a 1km radius of the development site and an assessment made of the potential for the proposed development to impact on the continuation of existing and future landuses.

3.2.3 Overall, construction phase land use impacts on surrounding land uses are not predicted to be significant. Construction works will be temporary and any potential impacts on surrounding land-use will be sufficiently mitigated to a negligible level, as demonstrated throughout the Environmental Statement.

3.2.4 The proposals will not result in significant adverse impacts in terms of land-take of existing arable land on site, with the minor loss of arable land significantly outweighed by the benefits of the scheme. It has been concluded that with appropriate mitigation in place, operational phase impacts on surrounding landuses will be insignificant.

3.3 Socio-Economic

3.3.1 A baseline assessment has been undertaken to determine the current socio-economic position across Herefordshire and the surrounding region. Statistics have shown that there are a lower percentage of people unemployed across

Herefordshire in comparison to the region and the nation as a whole. Therefore, receptors are considered to be of low sensitivity to job/employment generation. There is considered to be a potential for a medium number of businesses to be impacted upon (positively and negatively), therefore sensitivity of other businesses is considered to be medium.

3.3.2 The construction phase is anticipated to be short term and temporary, lasting for up to 18 months. A minor beneficial impact is predicted in terms of temporary job creation and moderate beneficial impacts on local and regional businesses as a result of the requirement for plant and machinery hire, raw materials and contractor services.

3.3.3 The main socio-economic impacts associated with the operational phase have been predicted to be the following:

- Creation of jobs both directly and indirectly;
- Positive impacts on local and regional businesses;
- Socio-economic impacts on recreational activities in the vicinity of the site; and,
- Growth of an existing successful local rural business.

3.3.4 It is estimated that 4 jobs will be directly created and up to 1 job created indirectly in the local and regional area, which is predicted to result in a minor beneficial impact.

3.3.5 A moderate beneficial impact is predicted on local and regional businesses as a result of requirement for plant/machinery hire, raw material provision and maintenance services.

3.3.6 No significant impacts are predicted on the enjoyment and use of recreational areas adjacent to the site, such as the ancient woodland areas.

3.3.7 A minor beneficial impact is predicted in terms of the growth and diversification of an existing local and successful rural business.

3.4 Traffic and Highways

3.4.1 An assessment has been undertaken to evaluate the impact of the development on the environment with respect to transport.

3.4.2 Assessments of the effects were undertaken during both the construction and operational stages of the proposed development on the following:

- Driver delay;
- Public transport users;
- Pedestrian delay;
- Pedestrian amenity;
- Fear and intimidation;
- Severance; and,
- Accidents and road safety.

3.4.3 Effects on transport during the construction phase of the development are below the level requiring assessment and are lower than the effects of the operational phase.

3.4.4 A Construction Environment Management Plan will be prepared following any grant of planning permission to detail the proposed construction traffic routes which will be briefed-out to contractors and suppliers to instruct traffic associated with the construction of the proposed development to use the most appropriate routes.

3.4.5 Facilities within the site will be provided for construction workers including car parking, loading and unloading of plant and associated construction materials. A wheel wash area will be provided at a position to be agreed with the Local Authority

to reduce the incidence of transfer of mud or loose materials onto the public highway.

3.4.6 Vehicular access to the development will continue to be provided in the same location as the existing access along the A417. Extensive consultation has taken place with the Local Highways Authority in relation to the form of the proposed site access, with it being agreed that the junction would be designed with a ghost island right turn. The site access provides adequate levels of visibility based on the observed 85th percentile traffic speeds.

3.4.7 The internal access road has been designed with a 7.3m width for a distance of around 50m from its junction with the A417. The access road then narrows down to single track for a large portion of its length, with passing places provided. Good levels of intervisibility splays are provided between the passing places in order to allow approaching vehicles to observe one another and wait to allow vehicles to safely pass.

3.4.8 It has been demonstrated through swept path analysis that the scheme can safely accommodate the turning movements of a 16.5m long articulated vehicle. In addition, adequate levels of parking will be provided to accommodate the demand generated by the staff.

3.4.9 The personal injury accident data for the most recently available five year period has been reviewed and does not represent a material concern in the context of the proposed development.

3.4.10 The proposed development is anticipated to result in a maximum increase of one additional vehicle movement once every 3-5 minutes during both the morning and afternoon peak hours depending on seasonal variations throughout the year.

3.4.11 Having regard to the low number of vehicle trips and their distribution on the local highway network, while no further detailed assessment of the local highway

network is required, consideration has been given to public concern over systemic impacts. It is concluded that the traffic impact of the scheme, including the use of the existing access and the local road system, is acceptable in planning terms.

3.4.12 It is concluded that there is no highway-related reason to withhold planning permission for the scheme.

3.4.13 No significant adverse residual Traffic and Highways effects are predicted during the operational phase.

3.5 Ecology

3.5.1 The proposed site has an area of approximately 19 hectares. The majority of the site comprises arable farmland, which is bordered by boundary hedgerows and scattered broadleaved trees. There is a small area of broadleaved woodland within the site boundary, and other small woodlands adjacent to the site boundaries. A single pond lies within the site boundary.

3.5.2 The Ecological Impact Assessment has identified various impacts up to an international level due to the presence, or potential presence, of protected or priority species within the site boundary or the surrounding area and an internationally designated site within 10km of the site.

3.5.3 Mitigation and compensation measures are provided within Environmental Statement in order to reduce the impacts to insignificant levels. Furthermore, recommendations for enhancements are provided, which could improve the habitats locally following the development, resulting in a moderate positive outcome. This is therefore compliant with Herefordshire Council's local planning policies. Although not a statutory requirement for this application, the development will by far exceed the 10% threshold for Biodiversity Net Gain, achieving a net gain of 77.55% in habitats units and 123.33% in hedgerow units.

3.5.4 Provided the measures within Ecological Impact Assessment report are followed, it is considered that the proposed development will be compliant with all relevant legislation and planning policy and that the aforementioned ecological receptors will not be significantly negatively impacted.

3.5.5 A shadow Habitats Regulations Assessment has been undertaken by suitably qualified consultant. The assessment has concluded that the mitigation measures built into the scheme will ensure that any impact from the proposed development will be avoided or fully mitigated. Provided these measures are implemented, there is sufficient evidence that the proposed development will have no adverse effect on the integrity of the River Wye Special Area of Conservation, its designation features or its conservation objectives, through either direct or indirect impact pathways. The assessment confirms that planning permission can legally be granted, having regard to the Habitats Regulations.

3.5.6 As a recognised Competent Authority for the purpose of Habitats Regulations Assessment, the Environment Agency is obliged to undertake a Habitats Regulations Assessment as part of a permit determination process when a European Site may be affected. The issue of the Environmental Permit confirms that the relevant regulator is satisfied that European ecological sites will not be adversely affected by emissions from the proposed plant. Indeed, the Environment Agency have stated the following within their decision document which accompanies the permit:

"We have checked the location of the application to assess if it is within the screening distances we consider relevant for impacts on nature conservation, landscape, heritage and protected species and habitat designations. The application is within our screening distances for these designations.

We have assessed the application and its potential to affect sites of nature conservation, landscape, heritage and protected species and habitat designations

identified in the nature conservation screening report as part of the permitting process.

We consider that the application will not affect any site of nature conservation, landscape and heritage, and/or protected species or habitats identified."

3.6 Lighting

3.6.1 A Lighting Impact Assessment has been undertaken, supported by background survey at the site.

3.6.2 The lighting assessment has found no significant effects in the context of the EIA Regulations during the construction or operational phase.

3.6.3 The following mitigation is recommended during the construction phase:

- Construction Lighting Management Plan to be incorporated into the Construction Environmental Management Plan.

3.6.4 The following mitigation is recommended during the operational phase:

- Finalised scheme of lighting to be agreed with the Local Planning Authority.

3.7 Air Quality

3.7.1 An assessment has been undertaken of baseline air quality within the vicinity of the proposed site. The site is not located within an Air Quality Management Area, and local monitoring data indicates that local pollution levels are significantly below health based limit values in the vicinity of the site.

3.7.2 The potential air quality impacts during the construction phase includes dust from construction works on site, including earthworks and construction activities, dust raised by vehicles travelling to and from site (trackout), volatile organic compounds from stored liquids used in the construction process and exhaust emissions from

Heavy Goods Vehicles transporting materials to site. Impacts from construction phase vehicle exhaust emissions have been assessed to be insignificant. Provided relevant Pollution Prevention Guidelines are implemented, impacts from volatile organic compounds are not predicted to be significant. A series of good practice dust mitigation measures have been outlined within the Environmental Statement which are predicted to control any minor dust impacts to a negligible level.

3.7.3 The potential air quality impacts during the operational phase includes:

- Odour from the operations;
- Emissions from Combined Heat and Power units backup boiler, flare, feed hoppers and digestate separation area; and,
- Vehicle exhaust emissions associated with Heavy Goods Vehicles and cars travelling to and from the site.

3.7.4 Given the number of additional vehicle movements, impacts from vehicle exhaust emissions are not predicted to be significant. A detailed Odour Management Plan will be implemented during operations which will ensure odour is controlled to an acceptable level. Detailed modelling of potential air emissions from the site has demonstrated that resulting pollutant concentrations will not generate significant impacts. Emissions from site operations, including odour, will be controlled and regulated under an Environmental Permit. As such, confidence is high that sufficient mitigation will be in place to control any potential air quality impacts to a negligible level.

3.7.5 Technical specialists within the Environment Agency previously reviewed the emissions modelling assessment as part of the permit determination exercise and were satisfied that sufficient information had been provided to demonstrate that impacts from residual air emissions will be insignificant, confirmed by issue of the Environmental Permit. The emissions modelling assessment has since been updated to address comments made by Natural England, to include modelling of ammonia and in-combination impacts. This has confirmed that the proposals will not have

significant adverse impacts on the River Wye Special Area of Conservation, both alone or in-combination with other relevant projects.

3.7.6 It should be further noted that in accordance with material planning guidance issued by Natural England on 16th October 2025, the proposed site is beyond the relevant screening distances from Sites of Special Scientific Interest and European Sites, such that the 'no likely significant effect' can be concluded for air emissions with no requirement for Air Quality Assessment in relation to such sites.

3.8 Noise and Vibration

3.8.1 A baseline assessment has been undertaken to assess existing levels of noise and receptors sensitive to noise surrounding the site.

3.8.2 During construction works, there is potential for noise impacts as a result of site preparation works, construction of the buildings and structures and from Heavy Goods Vehicles travelling to and from the site. However, provided the following good practice mitigation measures are followed, residual construction phase noise impacts are predicted to be negligible.

- Restriction of construction works to daytime hours only;
- Minimising drop heights during unloading of materials;
- Careful placement of materials;
- Avoiding unnecessary revving of engines and switching off engines when plant and machinery not in use;
- Siting any stationary plant and equipment used in construction works as far away from sensitive receptors as practicably possible;
- Use of plant and machinery in accordance with manufacturer specifications and ensure plant and machinery is appropriately maintained; and,
- Starting up plant and machinery sequentially rather than simultaneously.

3.8.3 During the operational phase, there is potential for noise impacts as a result of Heavy Goods Vehicles used for the delivery and export of materials and from operation of the process itself. However, such impacts have been quantified within a BS4142 noise assessment, which has demonstrated that resulting noise levels will not be significant, as a result of mitigation built into the scheme. Therefore, impacts are predicted to be negligible. However, a Noise Management Plan has been prepared for the operation to ensure that potential for noise is minimised as far as is possible.

3.8.4 Noise will be controlled and regulated under an Environmental Permit. As such, confidence is high that sufficient ongoing mitigation and controls will be in place to control any potential noise impacts to a negligible level.

3.9 Archaeology and Cultural Heritage

3.9.1 An Archaeology and Cultural Heritage Assessment has been undertaken to consider the effect of the proposed anaerobic digestion plant on archaeological and built heritage resources (referred to as "heritage assets" as defined in the National Planning Policy Framework) within and surrounding the site on land at Whitwick Manor, Herefordshire.

3.9.2 At present it is not possible to fully assess the archaeological potential of the site although it is considered that features relating to former agricultural regimes, such as field boundaries may be present, furthermore Historic England record the presence of an undated enclosure within the site boundary. The results of the agreed scheme of archaeological trial trenching, which follows a geophysical survey, will allow the Archaeological Advisor of Herefordshire Council to make a reasoned decision regarding the need for further archaeological work in advance of development.

3.9.3 The proposed site plans suggests a sympathetic level of planned landscaping and plant screening. When considered alongside the implementation of the proposed

Trial Trenching and any potential archaeological mitigation, the development would have a negligible effect (less than substantial harm) to the setting and significance of designated and non-designated heritage assets within the vicinity of the site boundary.

3.10 Landscape

3.10.1 The proposed development is situated within regular flat to gently sloping fields, currently in agricultural use. It is immediately to the South and South-West of the A417 and to the West of the complex of buildings and residential properties associated with Whitwick Manor.

3.10.2 The site is not recognised for its value through any landscape relevant designations. There are however landscape relevant designations within the study area including the Cowarne Court Unregistered Park and Garden, immediately to the North and East of the A417. The centre of Ocle Pychard to the North-West is recognised as a Conservation Area and there are also scattered Scheduled Monuments and Listed Buildings in the study area.

3.10.3 Overall, based on the content of the Landscape and Visual Impact Assessment, as well as consideration against relevant landscape guidance, it is considered that the site and its immediate landscape setting is not a valued landscape, with reference to the National Planning Policy Framework.

3.10.4 In addition, although the site has some tranquil elements due to its location within an agricultural landscape, it is considered that the site and its surroundings are not relatively undisturbed by noise and not prized in terms of recreation and amenity to a noteworthy extent. This is due to the direct and indirect influence of surrounding development, including indirectly by the noise of the adjacent major road.

3.10.5 The proposed development will introduce built elements within an agricultural landscape and will have the potential to directly and indirectly affect landscape

relevant designations, landscape character and visual amenity receptors and their views.

3.10.6 Through sensitive design and siting advice during the earliest stages of the assessment process and the proposed extensive landscape mitigation measures, focussed within and on the boundaries, this will ensure that any potential effects will be kept to a minimum.

3.10.7 The development design and layout, including the landscape mitigation measures, will respect the wider character and features of the landscape, will restrict its visual profile in the immediate and wider landscape and will help to reduce the proposed development's visibility and wider effects on landscape character. The influence of the proposed development on the wider landscape character and views will also be restricted not only by the existing vegetation immediately surrounding the proposed development, but also development and mature vegetation in the wider landscape.

3.10.8 Although the proposed development will be perceived, largely only in close proximity, the growth of the proposed landscape mitigation measures will restrict this influence over time.

3.10.9 There will be a loss of existing hedgerow along the A417 and tree vegetation on the fringes of the existing shelterbelt planting to accommodate the new access arrangements, as agreed with Herefordshire Council.

3.10.10 However the growth of the proposed diverse native landscape mitigation measures, over time, including the enhanced management of the existing and retained shelterbelt planting, will help to compensate for this loss. The proposed diverse native woodland edge (tree and shrub) planting will also help to enclose and screen the proposed development.

3.10.11 In summary, the proposed development will introduce built elements, within an agricultural landscape. The proposed development will be perceived, largely only in

close proximity. The growth and establishment of the extensive proposed landscape mitigation measures will help to reduce this influence including ensuring that the proposed development will not dominate or largely influence the landscape, be out of character with the surroundings or dominate any key views. The growth of the proposed landscape mitigation measures will also provide benefits to landscape character, landscape pattern and nature conservation and biodiversity as well as promote a sense of place.

3.11 Arboriculture

3.11.1 The impacts on trees and groups at the site may potentially have a moderate adverse effect, however the scale of the losses and impact is negligible in relation to the overall area and numbers of trees, groups, woodland and hedgerows to be retained and protected.

3.11.2 Losses of vegetation would be mitigated by replacement hedgerow planting and tree and hedgerow cover at the site would be increased as shown in the landscape proposals for the development. The long-term viability of the tree stock and hedgerows would be secured through implementation of the landscape and habitat management plan.

3.12 Geology, Hydrogeology and Hydrology

3.12.1 An assessment of the potential geological, hydrogeological and hydrological impacts has been undertaken. The assessment included a description of the baseline geological, hydrogeological and hydrological conditions at the site including a site walkover survey and a water features survey.

3.12.2 The impacts due to the proposed development in respect of coal mining and non-coal mining, land stability, geodiversity, soils and agricultural classification, human health due to ground conditions at the site, hydrogeology and hydrology have been assessed. The cumulative impacts of the proposed development taking into account the wider area surrounding the site have also been assessed.

3.12.3 It is concluded that the potential impacts due to coal mining and non-coal mining on the proposed development is negligible and that the potential impacts elsewhere as a result of the proposed development due to coal mining are negligible. It is concluded consequently that the proposed development will not increase any cumulative impact in respect of the risk posed due to coal mining as a result of the development of the wider area.

3.12.4 It is concluded that the potential impacts due to land stability on the site and elsewhere as a result of the proposed development are negligible and that the proposed development will not increase any cumulative impact elsewhere due to land stability as a result of the development of the wider area.

3.12.5 It is concluded that the potential for the proposed operations to have an adverse effect on any geological Site of Special Scientific Interest or to compromise the favourable condition or the favourable conservation status of a Local Geological Site further than 1km from the site is negligible. It is concluded that the potential for the proposed operations at the site to result in a cumulative impact on a geological Site of Special Scientific Interest or Local Geological Site taking into account the current land use surrounding the site is also negligible.

3.12.6 It is concluded that the proposals will have a negligible impact on the quantity and quality of agricultural soil resources available and will not affect adversely the overall agricultural land classification of the site and surrounding area. There will therefore be no increase in cumulative impacts across the wider area as a result of the development due to changing agricultural practices elsewhere.

3.12.7 It is concluded that there is no source pathway linkage at the site between any potentially contaminative material and human health receptors. It is concluded that the proposed operations at the site will have a negligible impact on human health following the proposed development works. It is concluded that the proposed development will not increase any cumulative impact on human health receptors at the site or the area surrounding Whitwick Manor.

3.12.8 It is concluded that the proposed development will have a negligible hydrogeological impact on groundwater levels or quality in the Raglan Mudstone Formation. It is concluded that the proposed development will not increase any cumulative impact on groundwater levels or quality in the Raglan Mudstone Formation as a result of the agricultural use of the wider area of the site.

3.12.9 It is concluded that there will be a negligible impact on surface water levels in the catchment of the Withington Marsh Brook and the wider catchment of the River Wye. It is concluded that there will be an overall positive or beneficial impact on water quality in the Withington Marsh Brook and catchment of the River Wye through the reduction of nutrient inputs following the completion of the development. It is concluded that the proposed development will not increase any cumulative impact on surface water levels or quality in the Withington Marsh Brook or wider River Wye catchments as a result of the agricultural use of the wider area of the site.

3.12.10 It is concluded that during the construction phase, the development will have a negligible impact on coal mining and non-coal mining, land stability, geodiversity, human health due to ground conditions at the site, groundwater levels, groundwater quality, surface water levels and surface water quality.

3.12.11 It is concluded that the proposed development has been assessed consistent with the requirements of the Environmental Impact Assessment Regulations pertaining to geological, hydrogeological and hydrological impacts hence assessment or mitigation measures further to those set out in the Environmental Statement are not necessary.

3.13 Accidents and Major Hazardous Incidents

3.13.1 Given the controls that are required to be in place under the Environmental Permit, residual environmental impacts from accidents and major hazardous incidents are not predicted to be significant.

3.14 Cumulative Effects

3.14.1 No significant cumulative impacts are predicted as a result of the development.

4 Additional Copies of Environmental Statement

4.1 Additional copies of the Environmental Statement and Non-Technical Summary can be provided at cost as follows:

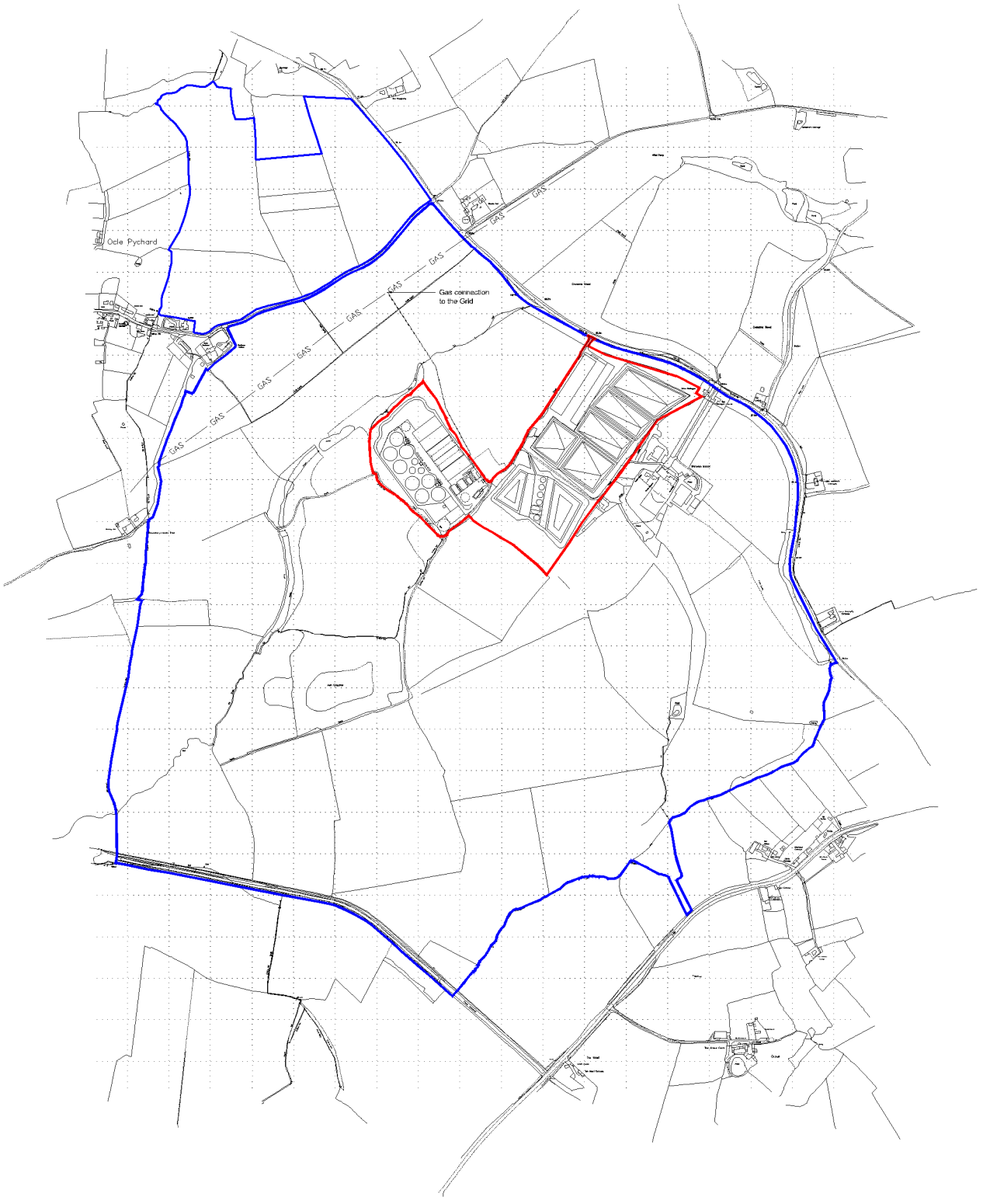
- [redacted] for electronic copy on compact disc; and,
- [redacted] for hard copy.

4.2 Copies of the Environmental Statement and Non-Technical Summary can be requested to the following address:

Bourne Valley Associates Ltd
Andover Lane Farm
Faberstown
Andover
SP11 9PE

Appendix I

Site Location and Layout Plan



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N
W
E
S

0m 100m 200m 300m 400m 500m

Rev No.	Revision Note	Date	Drawn	Checked
A	Pre App Drawings	12.11.19	AW	AW
B	Wetlands system added to the site	01.04.20	AW	AW
C	Grain Store updated	02.10.20	CJB	AW

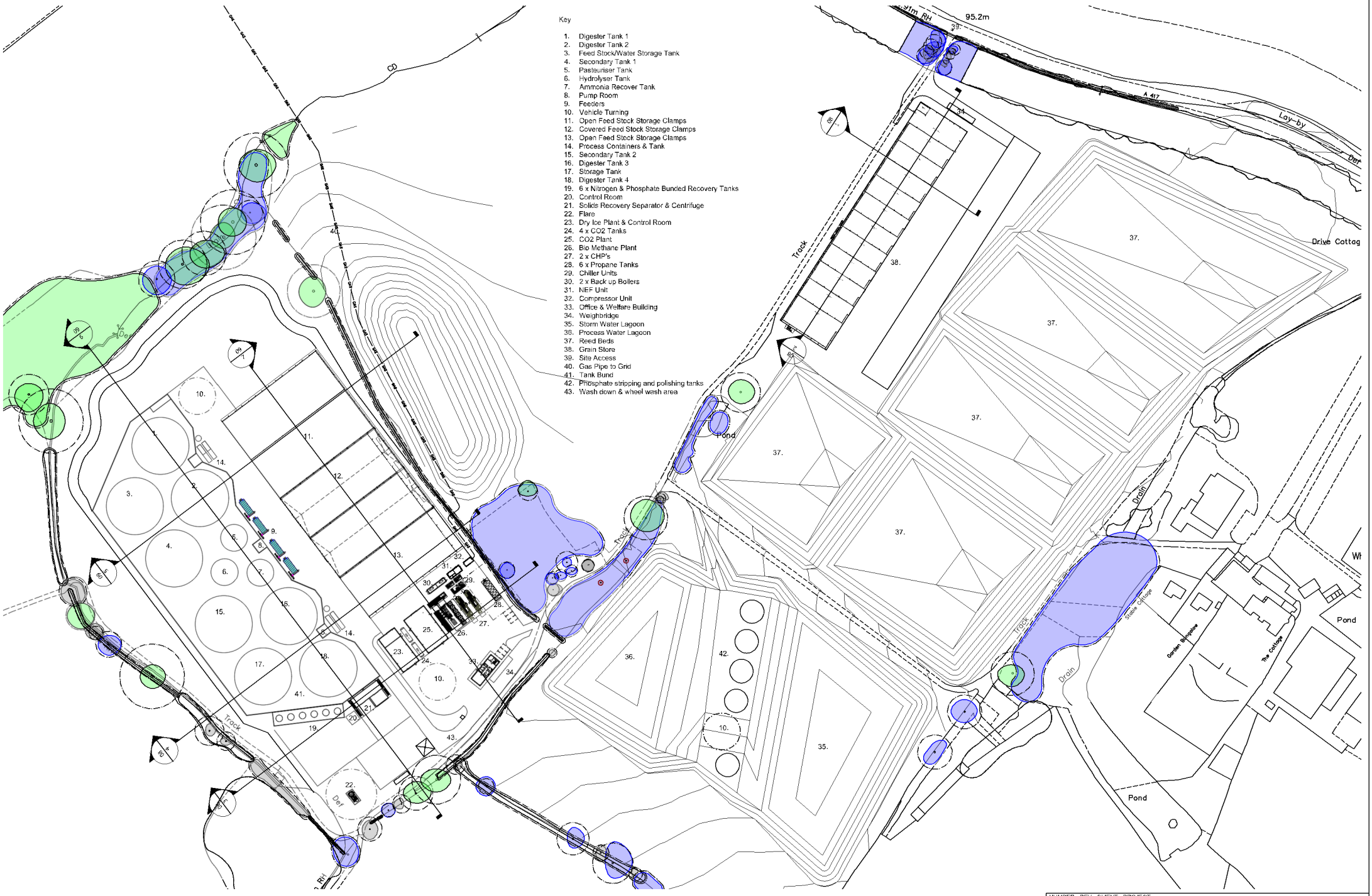
NUMBER - REV - CLIENT - PROJECT
01113-00 - C - N Layton - Whitwick Manor

TITLE
Location Plan

DATE	SHEET	SCALE
08.08.22	01	1:5000

DRN BY	CHK BY	PAPER SIZE
AW	AW	A1

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Rev No.	Revision Note.	Date	Drawn	Checked
A	Pre App Drawings	12.11.19	AW	AW
B	Wetlands system added to the site	01.04.20	AW	AW
C	Grain Store updated	02.10.20	CJB	AW
D	Red line site amended	07.09.22	AW	AW
E	Grain store and storage building revised	28.03.23	AW	AW
F	Manure storage building & bund updated	20.04.26	AW	AW

0m 10m 50m 100m 150m

NUMBER - REV - CLIENT - PROJECT
01113-00 - F - N Layton - Whitwick Manor

TITLE
Site Plan

DATE	SHEET	SCALE
08.08.22	02	1:1000
DRN BY: AW	CHK BY: AW	PAPER SIZE: A1

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