



**SOUTH
KESTEVEN
DISTRICT
COUNCIL**



Planning Committee

25 September 2025

S24/0568

Proposal:	Erection of an anaerobic digestion (AD) facility and carbon capture, improvement of existing and part creation of new access track, landscaping and other associated infrastructure
Location:	Development East of Sewstern Industrial Estate, South of Sewstern Road, Gunby
Applicant	Ironstone Energy Limited
Agent	DLA Piper UK LLP
Application Type:	Full Planning Permission with EIA
Reason for Referral to Committee:	To review the updated evidence submitted as part of the appeal against the previous decision to refuse planning permission
Technical Documents:	<ul style="list-style-type: none">• Addendum to Landscape and Visual Impact Assessment• Off-Site Traffic, Air Quality and Noise Assessment

Report Author

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Corporate Priority:

Growth

Decision type:

Regulatory

Wards:

Isaac Newton

Reviewed by:

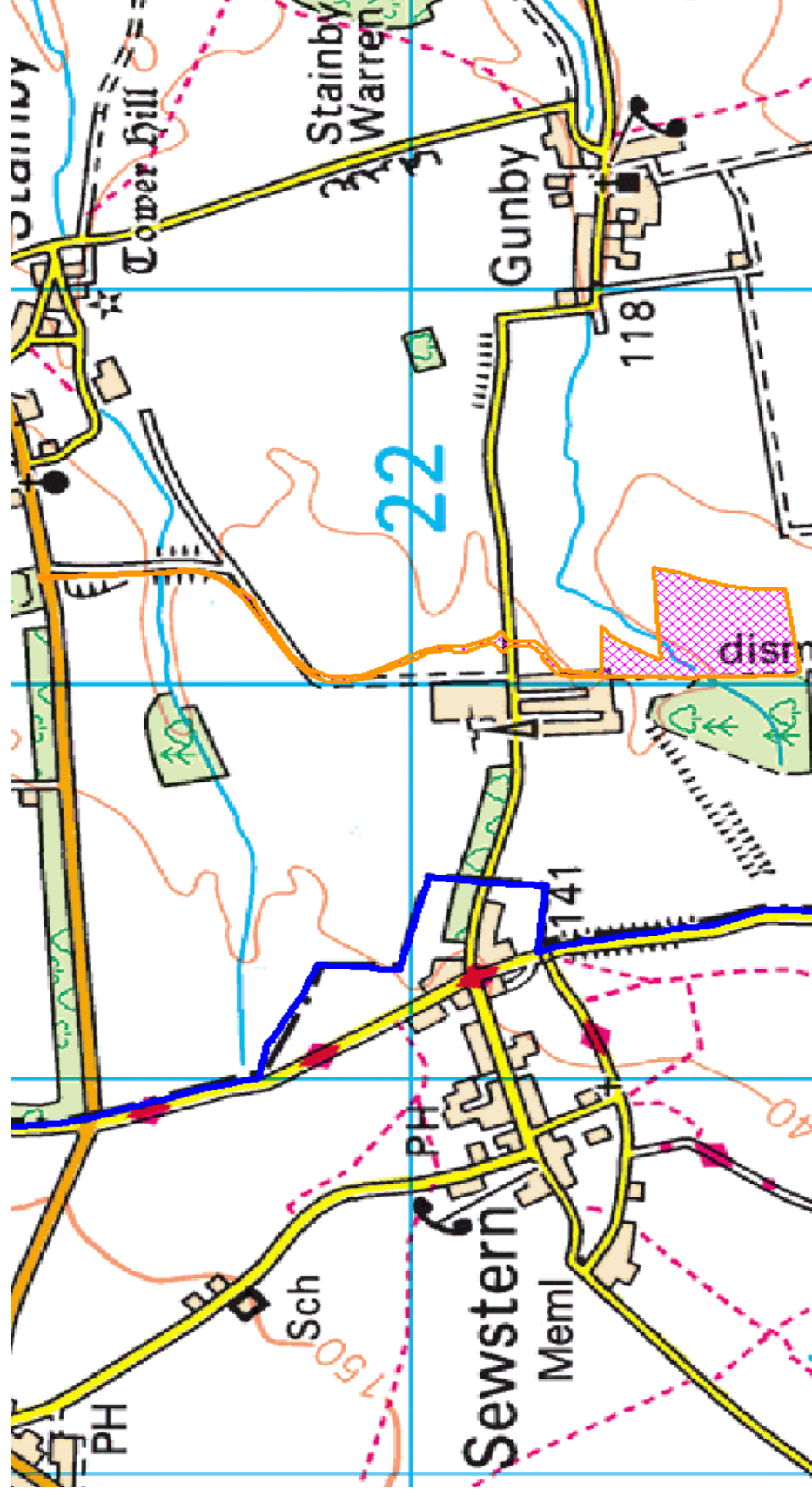
Phil Jordan, Development Management & Enforcement Manager

17 September 2025

Recommendation (s) to the decision maker (s)

To review the updated evidence submitted as part of the appeal and the position in defending the appeal

S24/0568 – Development east of Sewstern Industrial Estate, Gunby



Key



Application
Boundary



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Addendum to Committee Report S24/0568 – Sewstern Road, Gunby

1 Introduction

- 1.1 Members will recall that this application was previously discussed at the Planning Committee meeting on 23 January 2025. At that meeting, the Committee resolved to refuse the planning application, contrary to Officer's recommendation for the following reason(s):

"The proposal, including the required upgraded access route, would result in a large-scale, industrial development which is considered to be an inappropriate form of development in this countryside location. The large scale and industrial nature of the development proposal would result in an adverse impact on the landscape setting and character of the area, which would be reduced, but not fully mitigated by the proposed landscaping and planting scheme resulting in harm to the rural landscape of the Kesteven Uplands.

The proposal would additionally negatively impact on neighbouring villages and residents through disturbance from the generation of additional traffic movements on local roads. There is particular concern with increased number of HGV movements on minor rural roads, including through the neighbouring villages, that are used by vulnerable road users such as walkers, cyclists, horse riders and children. The mitigation of the site access road does not remove the concern regarding the increase in HGV movements through neighbouring villages, and the application does not suitably take into account or address the negative impacts from the development on the transport network or amenity of neighbouring communities.

It is acknowledged that the generation of renewable energy would be a significant benefit provided by the scheme, however, it is not considered to outweigh the harm from the development in terms of impact on landscape, character and appearance of the area, and the amenity of neighbouring residents. The development is therefore contrary to Local Plan Policy E7, EN1, EN4, DE1 and RE1, and Paragraph 135 of the NPPF.

2 Updates since January 2025

- 2.1 The Council are in receipt of a formal appeal against the decision to refusal planning permission for the proposed development. A formal start letter has been received from the Planning Inspectorate (PINS), who have confirmed that the appeal will be determined by way of a Public Inquiry. The timetable for the appeal is as follows:
- By 7th October 2025 – the Council must submit a copy of its full Statement of Case, including any documents, maps or plans that it intends to use in evidence at the inquiry.
 - By 18th November – the Council and Appellant must submit a copy of Proofs of Evidence, which is the written statement that the Council and its witnesses wish the Inspector to take into account during the Inquiry.
 - Tuesday 16th December – The Inquiry is to be held at SKDC and is due to sit for 4 days.
- 2.2 All parties involved in an appeal are required to behave reasonably to support the efficient and timely progress of the appeal. Where a party has behaved unreasonably, and this has directly caused another party to incur unnecessary or wasted in the appeal process, they may be subject to an award of costs. One example of circumstances where substantive costs may be awarded against a Local Planning Authority is in failing to review their case

promptly following the lodging of an appeal against refusal of planning permission, as part of sensible on-going case management.

- 2.3 As part of the submission of the Appeal, the Appellant has provided an addendum to the Landscape and Visual Impact Assessment, and an additional chapter of the Environmental Statement relating to off-site traffic, noise and amenity impacts. These are summarised and discussed in turn below.

Offsite Traffic / Air Quality / Noise (Create Consulting Engineers) (July 2025)

- 2.4 The Appellant has submitted an addendum to the Environmental Statement submitted as part of the planning application. The addendum specifically considers the potential impact of any changes in HGV movements that may be caused as a result of the development; and in particular, how any changes would impact on the amenity of the residents of the surrounding villages, in particular, Buckminster, Stainby, Colsterworth, Gunby and Sewstern. , and sets out the results of further updated traffic counts and CCTV assessments undertaken during June 2025 in each of the settlements.

- 2.5 A copy of the report is attached at Appendix 1 and can be summarised as follows:

Transport Assessment

- The main site access from Gunby Road has been amended to reduce the impact and scale of the access. The reduction in size of the radii has greatly reduced the overall size of the access providing a more defined route for the existing Gunby Road through traffic. In addition, the new HGV access track on the B676 Buckminster Road has been improved, providing improved visibility in both westbound and eastbound directions.
- The radii into the development has been restricted to prevent HGVs leaving the site from turning left or right along Gunby Road. All HGV movements will be directed to the north along the existing HGVs track which will be improved and extended to the south linking Gunby Road with the B676.
- The plant requires approximately 127,000 tonnes of feedstock to generate the planned 167.2GwH output. It is anticipated that 61,500 tonnes (48%) of that feedback will be supplied from the surrounding Buckminster Estate in addition to other nearby farms and stored on site until it is required. The remaining 65,500 tonnes of material will be supplied from a separate storage hub (Hub Clamp), which is proposed to be located to the east of the A1. Feedstock will be hauled from the Hub Clamp to the AD plant throughout the year with the amount reducing during the harvest period when more feedstock is provided directly from the surrounding fields. Buckminster Farm intends to supply 48,500 tonnes of feedstock, the remainder of the feedstock which is collected during the harvest will be provided by other farms in the nearby vicinity.
- Most of the grain currently farmed on the Estate is take to Garthorpe, to the west of the farm, where it is dried and processed before being sent on HGVs to its end market or other storage locations, namely grain stores on the estate.
- The straw which is harvested is generally moved 2 to 3 weeks after harvest and all of it is removed by road, the majority of which is transported off the farm using HGVs.
- All digestate currently used on the Estate comes in HGVs with generally 95% coming through Colsterworth from the A1.

Ironstone Traffic Generation/Distribution		
Harvest Scenario – October (Busiest Month)		
Process	Movements	Distribution
1. Harvest Movements	26 HGV 43 T/T	100% of HGV traffic from the west, southwest and north. Directed along Buckminster Road B676 towards the HGV access track. Other harvest traffic not using public highway mainly tractor trailer. 40% will be direct to plant off public highways/60% will be as HGV distribution
2. Hub Clamp/Store	10 HGVs	100% of traffic using HGV access track along Buckminster Road B676 to and from the A1
3. CO ₂	3.5 HGVs	100% of traffic using HGV access track along Buckminster Road B676 to and from the A1
4. Liquid Digestate	None	n/a
5. Solid Digestate	2.2 T/T	Tractor Trailer distribution same as Harvest HGVs
Changes in daily HGV Traffic Movements in 5 key villages		
Villages	Movements	Total Movements
Buckminster	26 25.8 (60% of 43)+2.2	26 HGV 28 T/T
Stainby	10 + 3.5 =	13.5 HGV
Colsterworth	10 + 3.5 =	13.5 HGV
Sewstern	-17.2 (40% of 43)	Minus 17.2 T/T
Gunby	-8.6 (approx. 50%)	Minus 8.6 T/T

Table 6.1: Traffic Generation/Distribution for Ironstone during the harvest period

Note: All movements taken from the FDL Schedule (Appendix C)

All HGVs are based on 26T vehicles and T/T are Tractor Trailer movements based on 16T.

All of the above are based on one-way daily movements

Ironstone Traffic Generation/Distribution		
Non-Harvest Period – March (Busiest Month)		
Process	Movements	Distribution
1. Harvest movements	n/a	None
2. Hub Clamp/Store	10 HGVs	100% of traffic using HGV access track along Buckminster Road to and from the A1.
3. CO ₂	3.5 HGVs	100% of traffic using HGV access track along Buckminster Road to and from the A1
4. Liquid Digestate	38.4 HGVs	Spread from site. Assume 40% not using public highway and 60% using HGV access track and Buckminster Road to distribute to the west
5. Solid Digestate	2.2 T/T	Assume distributed to the west along Buckminster Road
Changes in daily HGV Traffic Movements in 5 key villages		
Villages	Movements	Total Movements
Buckminster	23 (60% of 38.4) 2.2	23 HGV 2.2 T/T
Stainby	10 + 3.5 =	13.5 HGV
Colsterworth	10 + 3.5 =	13.5 HGV
Sewstern	None	n/a
Gunby	None	n/a

Table 6.2: Traffic Generation/Distribution for Ironstone during the non-harvest period

Note: All movements taken from FDL Schedule (Appendix C)

All HGVs are based on 26T vehicles and T/T are tractor trailer movements based on 16T

All of the above are based on one-way movements

- The above movements represent a worst-case daily change in HGV movements as a result of the development. With the ability for up to 40% of the farm to gain access to the AD plant without having to use the public highway, the introduction of the new

plant will result in a reduction of HGV movements in both Sewstern and Gunby. In particular, tractor trailer movements during the harvest period.

- At present these movements track westwards to the grain store at Garthorpe, using public highways. When the AD plant is operational, the crop from these areas will be delivered directly to the plant via the farm track network to the south, east and west of the plant, gaining access to the plant from the south.

	Surveyed Data		Estimated Changes in Daily HGV Movements		
	General Traffic	HGV	Harvest	Non-Harvest	Construction
Buckminster	1049>	253	+54.0	+25.2	+0
	1048<	231	+54.0	+25.2	+0
Stainby	892>	228	+13.5	+13.5	+30
	962<	222	+13.5	+13.5	+30
Colsterworth	1322>	278	+13.5	+13.5	+30
	1354<	280	+13.5	+13.5	+30
Sewstern	151>	39	-17.2	+0	+0
	155<	44	-17.2	+0	+0
Gunby	72>	15	-8.6	+0	+0
	76<	20	-8.6	+0	+0

Table 7.1: Changes in daily HGV movements

Note: General Traffic includes – LGVs, HGVs, Buses and Coaches

HGV includes – LGVs, HGVs, Buses and Coaches

Changes in Harvest and Non-Harvest Movements have been taken from Table 6.1 and 6.2.

- The analysis shows both Gunby and Sewstern experience no material change in HGV movements as a result of the construction stage and the non-harvest operational stage. However, these two villages would likely experience a reduction in HGV movements during harvest time, in particular tractor trailer movements. This has been estimated as a reduction of 17.2 daily tractor trailer movements in Sewstern and 8.6 daily tractor movements in Gunby.
- Buckminster shows the largest increase in movements during the Harvest period of up to an additional 54 HGV movements per day. As these movements relate to crop harvesting then it can be assumed that they would already be on the network during the harvest period, but travelling in a different direction towards the grain store at Garthorpe rather than the AD plant. These movements should not therefore be considered additional movements but rather a re-assignment of existing harvest movements on the network.
- For example, during the non-harvest period, Buckminster shows an HGV increase of 25.2 HGV movements in both directions. This is due to liquid digestate being delivered to the estate from the AD plant. However, these movements would already be on the network as the Estate currently imports liquid digestate from a 3rd party source.
- The only additional movements that would be experienced at Colsterworth and Stainby would be movements to and from the Hub Clamp / Store and the CO2 being removed from the site. These flows add 13.5 HGV movements in both directions, which represents a less than 5% increase in maximum daily HGV movements in these areas. These movements will only occur between Monday to Saturday, and will take place a maximum of 26 days a month during the non-harvest period, dropping to 14 to 18 days during the harvest.

- Whilst there is a small increase in HGV movements in this village, it is considered that the impact is negligible.
- The CCTV survey confirmed that there very few existing pedestrian and cycling movements along Gunby Road in the vicinity of the site. The highest number of cycling movements recorded in a single day was 19 which was in a westerly direction with 8 movements in an easterly direction. On the rest of the days surveyed, the number of cycling movements reduced to between 3 and 9 two way movements. The majority of these movements were straight through movements along Gunby Road, with only 2 days recording 2 cycling movements into Brooks Bros.
- The survey confirmed that there was very little pedestrian activity along Gunby Road. The largest movements were when 4 people used Gunby Road to access the industrial estate. The remainder of the days showed one or two movements being recorded.
- It is also proposed, subject to the availability of sufficient highway width that a new Trod (unsurfaced footway) will be provided along Gunby Road, which will seek to link the existing footway in Sewstern to the site access road and the industrial estate.

2.6 Officer's have engaged with Lincolnshire County Council (as Local Highways Authority) in relation to the updated evidence, and they have advised the following:

As per section 6.1 of the new Transport Assessment and 1.15.6 onwards of the old Transport Assessment, it is proposed that there will now be 127,000 tonnes of feedstock consumed, that is a drop of 3,000 from the previous proposed 130,000 tonnes.

It is proposed that 61,500 tonnes will now come from the surrounding farm and be stored on site. The remaining 65,500 tonnes of material will be supplied from a separate storage hubs.

It was previously proposed that 80,000 would come from the satellite sites, therefore, this is a reduction of 14,500 less being brought into the facility on the wider road network. The crops from the local area would be farmed and harvested if this site came a head or not, current harvests are taken to a grain store at Garthorpe, as such the storage and use of the crops on site would overall reduce the need to move 61,500 tonnes of crops going to a store and then onwards to a difference destination, however, would be counteracted by the incoming 65,500 tonnes from the hub sites, however, these would be directly into the site on A and B roads, rather than through the villages.

It was previously proposed that out of harvest there would be 28 HGV movements per day and in harvest there would be 70 HGV movements per day (although this was not narrowed down to highlight the impact on each village as per 1.15.18 and 1.15.19 of the old document). The new proposals would suggest that there will now only be 67 movements in harvest and 39 out of harvest, this in turn would equate to the highest number of HGVs per day dropping by 3.

There is no precise definition of "severe" with regards to NPPF Paragraph 116, which advises that "Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe." Planning Inspector's decisions regarding severity are specific to the locations of each proposal, but have common considerations:

- *The highway network is over-capacity, usually for period extending beyond the peak hours*

- *The level of provision of alternative transport modes*
- *Whether the level of queuing on the network causes safety issues*

In view of these criteria and taking into account the HGV movements because of the operation and construction stages of the AD Plan, including the reduction in overall movements for some villages, the consideration of movements that would be associated with the current farming of the land without the AD plant and existing movements on the highway network, the Highways Authority does not consider that the proposals would result in a severe impact with regard to NPPF.

Noise Assessment

- Two scenarios have been tested, the harvest period and the non-harvest period. Each period has been compared against the existing baseline to determine the change in sound levels over the short-term and long-term.
- Modelling during the harvest period shows a section of improved sound levels, this is due to a decrease in HGV movements along Gunby Road, Sewstern Road and Main Street. HGV movements on the access road has shown that an increase in sound will be present near the road, but all nearby receptors are shown to have a negligible to minor short term and negligible long-term impact.
- During the non-harvest periods, the impact to noise sensitive receptors is shown to be negligible over the short-term and long-term periods.
- Seasonal variations between harvest and non-harvest periods show a moderate short-term impact and low long-term adverse impact to some noise sensitive receptors. However, this area is already located close to several working farms and given the rural natural of the area is expected to overestimate the significance of impact to these receptors.

Air Quality

- Real time air quality monitoring was undertaken at three locations – Stainby, Gunby and Sewstern – over a three week period in summer 2025 to provide baseline data for the assessment.
- Concentrations for NO₂, PM₁₀ and PM_{2.5} remained well below relevant Air Quality Objectives throughout the monitoring period with the highest hourly and daily values recorded at Gunby. These findings indicate that baseline air quality within the vicinity of the proposed development is generally good, and pollutant levels are unlikely to pose a constraint on the scheme.
- The modelled results show predicted annual mean concentrations across the site boundary were below the relevant AQO in the proposed operational year, 2027. The development is therefore considered suitable for the proposed use without the implementation of mitigation techniques for air quality.
- The assessment has found that traffic generated during the plant's operation would result in a negligible impact on local air quality. As construction traffic is short term, its contribution is limited. When considered cumulatively, the combined effect of emissions from the plant, associated operational traffic, and construction activities is

still predicted to be negligible, with no significant change in pollutant concentrations at any sensitive receptor.

- 2.7 Officer's have also engaged with the Council's Environmental Protection Team in relation to the updated noise and air quality evidence, and they have advised the following:

The proposed approach involves constructing a dedicated HGV access track connecting the site directly to the B676 Buckminster Road. This design ensures all HGV movements avoid residential areas in Sewstern and Gunby.

Traffic Assessment Highlights

- *The report indicates that many HGV movements represent reassignments of existing traffic, rather than entirely new trips, thereby lessening the overall perceived impact on local communities.*
- *During the harvest period, HGV activity in Sewstern and Gunby is expected to decrease due to the use of farm tracks providing direct access to the AD plant.*

Construction Phase Management

The report proposes a Construction Traffic Management Plan (CTMP) will be implemented. This will ensure that all construction-related HGVs use the dedicated access route, avoiding local residential roads.

Traffic Impact Summary

- *Sewstern and Gunby: Anticipated reduction in HGV movements during harvest, enhancing road safety and residential amenity.*
- *Buckminster, Stainby, and Colsterworth: Minor increases in HGV traffic expected, though largely due to rerouting existing vehicles. These changes are not expected to result in significant negative impacts.*

Noise and Air Quality Impacts

- **Noise:** *Predicted impacts range from negligible to minor adverse, with no significant long-term effects on local residents.*
- **Air Quality:** *Expected to remain within acceptable levels, with pollutant concentrations well below Air Quality Objectives (AQOs) at all sensitive receptors.*

Cumulative Impact

The combined effects of construction, operational traffic, and plant activity are predicted to be negligible, resulting in minimal disruption to surrounding residential areas.

Conclusion

The proposed traffic and environmental mitigation measures particularly the dedicated HGV access track, use of farm tracks, and CTMP are appropriate and effective in reducing potential impacts. The assessment supports the conclusion that the development will have a negligible impact on traffic, noise, and air quality, and will not significantly affect the residential amenity of nearby villages

Addendum to Landscape and Visual Impact Assessment (Broome Lynne)

- 2.8 The Appellant has also submitted an addendum to the Landscape and Visual Impact Assessment submitted as part of the application. The addendum seeks to respond to observations made by members of the public during the determination of the planning application. Notably, the Addendum does not reach any alternative conclusions in respect of the likely harm resulting from the proposed development, which it reiterates as being moderate adverse in the short term, to minor in the long term.
- 2.9 A copy of the Addendum is enclosed at Appendix 2 and is summarised as follows.

- It is noted that the area around the site is not subject to any landscape conservation or protection designations, and it is considered that it is an intensively farmed and highly managed landscape with few extant semi-natural landscape features or distinctive characteristics.
- Even the woodland immediately to the west of the application site is a modern feature of the second half of the 20th century. The extensive past use of the surrounding land for ironstone extraction, and its subsequent partial restoration, has resulted in significant changes in the natural landform as evidenced by topographical mapping. A railway associated with the ironstone works stretched north-south running along the western side of the site, and which is now used in part as farm tracks, and the former railway sidings and quarry immediately north of the site are now used as a busy industrial and commercial centre.
- Thus, it is a relatively undistinguished landscape with topography and features which have been heavily influenced by historical industrial activity, recent commercial development immediately to the south of the site and modern intensive agriculture.
- The form and appearance of the domed digester vessel and associated tanks introduced by the proposed development may contrast with the large barn type structures normally seen on agricultural complexes in the countryside. However, following completion of the construction works, taking into account the distance from residential properties and settlements, the existing vegetation, local topography, surrounding agricultural and commercial activities, and the fact that the site does not fall within a designated landscape, it is considered that initially the proposed development would result in a partial change to the landscape characteristics of the Character Area.
- Visually, the LVIA concedes that from the closest viewpoints to the east (from the permissive footpath to the south of Gunby), and some views through the roadside hedgerow to the north-east and north-east there will be a moderate adverse impact due to construction activities, and the introduction of a new built feature, reducing to minor adverse with landscape mitigation after year 5. The reduction in the level of impact is because over time (5-15 years), the proposed new planting and growing on of existing vegetation will mature and increase in density and soften the proposed scheme.
- There is a slight adverse impact on the topography of the area. This is because the proposed development will make a slight difference in the landform. However, this is very minor, and one which would be expected with any form of development.

Appellant's Statement of Case

- 2.10 The Appellant's Statement of Case (Appendix 3) has suggested that the Local Planning Authority has misapplied Policy E7 of the Local Plan, insofar as it relates to small business schemes in the rural economy, and given this is not a small business scheme, the policy is not applicable.
- 2.11 However, Officer's note that Paragraph 2.91 of the supporting text identifies that the policy relates to "the need to support sustainable growth and businesses in rural areas, and also that diversification into non-agricultural use is important to ensure the continuing vitality of rural areas. Local authorities are encouraged to establish criteria to be applied to planning applications for farm diversification and to support diversification for business purposes".

- 2.12 In this case, the proposed development relates to a land-based operation, in which the proposed development supports the continued diversification of an agricultural operation by providing a secured use for the crop. As such, it is Officer's assessment that this policy is applicable.

3 Officer Advice to Members

- 3.1 Following the Planning Committee's resolution refuse the application, contrary to Officer recommendation, this report seeks to advise Members of the additional / revised evidence submitted as part of the planning appeal and seek confirmation as to whether the Committee wishes to reconsider its position in relation to any matters of landscaping, highways impact or residential amenity, in light of the updated evidence and advice received from statutory consultees.
- 3.2 Officer's have engaged with Counsel regarding the appeal, and a copy of their written advice will follow as part of the additional items paper.
- 3.3 Members are advised that Counsel advice is exempt from publication due to it containing details which are subject to legal privilege, and therefore, publication of this information could prejudice the Council's position in relation to the forthcoming appeal. Furthermore, for the same reasons, members of the public and press will be excluded from the meeting during the discussion of this advice and any resolution in relation to the Council's approach to the appeal.
- 3.4 As required by the Local Government Act 1972, in circumstances where the Council wish to consider a matter with press and public excluded from the meeting, it is necessary to weigh up the arguments for and against disclosure on public interest grounds. It is considered that there is public interest in further information relating to the appeal being in the public domain, which include enabling further public understanding of the issues involved, further public participation in the consideration of the revised evidence, and promoting transparency for the Council's decision-making process.
- 3.5 Weighed against this is the fact that the exempt appendix is to contain legal advice which is subject to legal professional privilege. The principle of ensuring access to full and frank legal advice is fundamental to the administration of justice. Although the Council aim to be transparent and accountable to the public, in this case the safeguarding of the openness in all communications between the Council and the lawyer overrides the public interest in disclosure.
- 3.6 It is considered that the public interest is best served in this matter by not releasing this information at this time and that a significant amount of information regarding the matter has been made available on these issues – by way of the main report. Relevant information regarding this matter will be put in the public domain at the appropriate time. The Council considers that the public interest is in favour of exempting this information.

4 Recommendation

- 4.1 To review the updated evidence submitted as part of the appeal and to review the position of the appeal.

Appendix 1 - Offsite Traffic / Air Quality / Noise (Create Consulting Engineers) (July 2025)

Appendix 2 – Addendum to Landscape and Visual Impact Assessment (Broome Lynne) (August 2025)

Appendix 3 – Appellant's Statement of Case

