



Wiltshire Planning Department
County Hall
Bythesea Road
Trowbrifge
BA14 8JN

7th November 2025

Dear Sir

Re: Planning Application PL/2023/03359

1. Introduction

I am writing to register my **strong objection** to the proposed Anaerobic Digestion facility at Land west of Ashton Road, Ashton Keynes (PL/2023/03359).

Having reviewed the information published on the planning portal and the applicant's consultation material, I believe the proposal conflicts with national and local environmental planning policy, including the protection objectives for the **Cotswold Water Park Site of Special Scientific Interest (SSSI)** and Wiltshire Core Strategy Core Policies 50 (Biodiversity & Geodiversity), 51 (Landscape), 52 (Green Infrastructure), 60 (Transport) and 67 (Flood Risk).

The documentation supplied does not demonstrate that the development can proceed without significant risk to the environment, local amenity, or road safety.

2. Inadequate assessment of impacts on the Cotswold Water Park SSSI

The application site lies within the functional ecological network of the Cotswold Water Park SSSI, supporting important assemblages of waterbirds and aquatic species.

No independent **Ecological Impact Assessment (EclA)** or **Habitats Regulations/SSSI Assessment** has been made publicly available.

Without such evidence, Wiltshire Council cannot conclude that there will be no adverse effect on the integrity of the SSSI, contrary to NPPF § 180 and Core Policy 50.

I request the Council to obtain statutory advice from **Natural England** and defer determination until a full independent EclA and SSSI Impact Assessment are submitted.

3. Risk to water quality and nutrient enrichment

The proposal involves the production and storage of large volumes of **digestate**.

No **Digestate Management Plan** or nutrient-budget analysis is available to demonstrate that nitrogen and phosphorus loading to nearby lakes and drainage channels will not increase.

Given the known eutrophication pressures within the Water Park, any discharge, runoff or over-application of digestate presents an unacceptable pollution risk contrary to **Core Policies 67 and 69**, and the Environment Agency's Pollution Prevention Guidance.

The application should be refused or withdrawn until a detailed digestate storage, handling and spreading plan — including impermeable secondary containment and emergency spill provisions — has been independently reviewed by the **Environment Agency**.

4. Flood-risk and contaminated-floodwater concerns

Public information describes the site as being within a flood-influenced landscape of lakes and ditches.

No robust, site-specific **Flood Risk Assessment (FRA)** has been provided addressing the risk of contaminated floodwater leaving the site during extreme events.

Without this, the Council cannot be satisfied that the proposal meets **Core Policy 67** or the NPPF flood-risk tests.

An FRA should model 1-in-100 (+ climate-change) and 1-in-1000 events and demonstrate that all tanks and bunded storage remain secure under such conditions.

5. Odour, air-quality and bioaerosol impacts

While the applicant claims the process is sealed, no **Odour Impact Assessment** or **Odour Management Plan (OMP)** has been published.

Experience elsewhere shows that AD facilities can generate persistent odour, ammonia and bioaerosol emissions, especially during loading, maintenance or faults.

The lack of dispersion modelling or enforceable odour-control measures makes the proposal contrary to **Core Policy 55 (Air Quality)** and incompatible with neighbouring residential and recreational uses.

6. Transport, traffic and road-safety issues

The proposed scale of operation will require substantial **HGV movements** to deliver feedstock and remove digestate. Local roads around Ashton Keynes and the Cotswold Water Park are narrow and heavily used by visitors, walkers and cyclists.

No detailed **Transport Assessment** or HGV routing plan has been provided, nor any cumulative traffic analysis.

This omission prevents the authority from assessing highway safety and amenity impacts as required under **Core Policy 60**.

7. Landscape and visual harm

Even with reduced tank heights, the facility remains an industrial complex within a largely rural and recreational landscape.

No verified **Landscape and Visual Impact Assessment (LVIA)** has been provided to demonstrate how the plant will appear from key viewpoints across the Water Park or public rights of way.

The proposal therefore conflicts with **Core Policy 51** and the aims of the Cotswold Water Park Landscape Strategy.

8. Cumulative and climate considerations

The application does not consider the **cumulative impacts** of other agricultural and energy developments nearby. Furthermore, the claimed climate benefits lack supporting **life-cycle carbon analysis** demonstrating a genuine net reduction in greenhouse-gas emissions once transport, methane leakage and CO₂ venting are included.

Without such evidence the proposal cannot claim to contribute positively to Wiltshire's climate-change objectives (**Core Policy 41**).

9. Damage to Tourism

Cotswold Water Park welcomes approximately 1 million visitors annually and supports a substantial number of local jobs. The visitor economy is a key driver for the region. It is inappropriate to site a large industrial plant of this type in the heart of the Water Park, and may have a considerable impact on visitor numbers.

10. Environmental benefits

The environmental benefits of biodigesters that use purpose- grown crops as feedstock is highly debatable. It appears from the Planning Application that the scheme is not purely “waste-to-energy” and that in fact less than 25% of the feedstock is actual waste. Around 75% will come from crops grown specifically for the plant. This raises issues of land use competition (food vs energy/crops), possible indirect effects on biodiversity and soil,, and justification under waste/renewables policy.

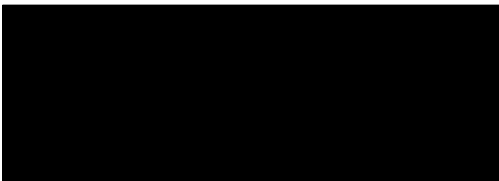
11. Conclusion and requested action

Given these material omissions and potential harms, I respectfully request that Wiltshire Council:

1. **Refuse** application PL/2023/03359 on the grounds that it fails to demonstrate compliance with Core Policies 50, 51, 52, 55, 60 and 67 of the Wiltshire Core Strategy and the NPPF; **or**
2. At minimum, **defer determination** until the applicant provides:
 - A full independent **EclA / SSSI Impact Assessment**;
 - A **Digestate Management Plan** and nutrient budget;
 - A detailed **Flood Risk Assessment** addressing contaminant mobilisation;
 - An **Odour Impact Assessment & OMP**;
 - A comprehensive **Transport Assessment** and **LVIA**.

I also request that the Council obtain formal consultation responses from **Natural England**, the **Environment Agency**, the **Lead Local Flood Authority**, the **County Ecologist**, and the **Environmental Health** team before proceeding.

Yours faithfully



Malcolm Johnston

