

Conflicts With Waste Core Strategy

Introduction

The Officer's April Report to Committee set out that the application should be considered against the Wiltshire Waste Core Strategy 2009 policies. Section 6.3 of the Officer's Report concludes that the development is acceptable against a number of policies including WDC1 and WDC2 of the Waste Core Strategy. More careful reading of all of the policies in the Waste Core Strategy highlights a number of serious conflicts as set out below. There are other conflicts with the Waste Core Strategy with regard to landscape, environment and the Cotswold Water Park Biodiversity Action Plan which are covered elsewhere in the 2015 Wiltshire Core Strategy so are not considered here.

WDC1 – Key Criteria

"... All proposals for waste management will be assessed using the following key criteria where appropriate:

- *The impact of transporting waste to and from the site is minimised*
- *The extent to which adverse impacts on the water environment and flood risk are avoided"*

Transporting waste has not been minimised. How can the transporting of waste (chicken litter) from the Wye Valley to Wiltshire¹ to turn into biomethane for onward transport to Banbury be a minimisation of transport? It cannot. Furthermore, the location of the plant is also sub-optimal since the site is surrounded by lakes, quarries, housing and villages. An alternative site, within the 10 mile radius area of search, away from these developments could ensure that most of the locally produced feedstock would travel a shorter distance, minimising transport impacts including carbon emissions from transport.

Adverse impacts on the water environment and flood risk are not being avoided by the selection of the Ashton Down site due its proximity to the SSSI, its location within Groundwater Protection Zone 2 and it being within 10m of a water course that feeds directly into the SSSI lakes. Adverse impacts could be avoided by the selection of an alternative site that doesn't have these characteristics.

Quite clearly the proposed development is in conflict with Policy WDC1

WDC4 – Protection of Recreational Assets

"Proposals that would have a significant adverse impact upon tourism or recreational facilities will not be permitted unless mitigation measures are adopted."

¹ see section 6.6 of the Agricultural Economy Report by Savills of July 2025

The importance of leisure and tourism within the Cotswold Water Park has been comprehensively demonstrated in the Somerford Keynes Parish Council's Objection of 10 May 2026. This policy is fundamentally breached. There are no mitigation measures in the application for tourism or recreation. On the basis of this policy alone, the application should be refused.

WDC 11 – Sustainable Transport of Waste

“Waste management facilities will be permitted where it is demonstrated that the proposals facilitate sustainable transport ...

- *Minimising transport distances*
- *Minimising the production of carbon emissions*

.... The Transport Assessment will need to:

- *Consider the potential cross-boundary impacts and cumulative impacts of the development with other local developments”*

As set out under WDC 1 above, transport distances are not minimised either within the supply of local feedstock or the long-distance delivery of chicken litter from the Wye Valley. Carbon emissions from transport will therefore be higher than they need to be. Again, this highlights that the Ashton Down site is the wrong location for this facility and that alternative sites should have been considered.

There has been no assessment of cumulative or cross-boundary transport impacts. The transport impacts go far beyond Wiltshire's borders into Gloucestershire, Oxfordshire as well as further afield for the Wye Valley chicken litter deliveries. Before any consideration can be given to approving this application, a full Transport Assessment that meets the requirements of this policy needs to be undertaken. As has been stated many times, cumulative transport impacts have not been assessed and no account has been taken of the transport movements from the recently approved Ashton Keynes quarry, Kings Meadow or The Steadings. Conflict with Policy WDC 11 is clear.

Conclusion

The Ashton Down proposal fails the policies in WDC1, WDC 4 and WDC 11 of the Waste Core Strategy. Yet none of these failures were brought to the attention of the Strategic Planning Committee on the 21 April 2025. The Officer's Report concluded that policy WDC1 had been passed. Indeed, there was no reference at all to the importation of chicken litter from the Wye Valley in his report. The failures, particularly WDC4, are severe and should be given significant weight in the planning balance.