

Supplementary Representation: Transport and Highways

Application PL/2023/03359: Construction and operation of an anaerobic digestion facility, ancillary infrastructure and construction of new access from Ashton Road, Land West of Ashton Road, Ashton Keynes, SN6 6QT

Submitted by: Mike McKeown

Resident, Somerford Keynes

Ward Councillor, Kemble Ward (Cotswold District Council)

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Date: 3 June 2026

To: Development Management, Wiltshire Council. Submitted via the planning portal.

1. Introduction and standing

This representation supplements my objection already on the record for this application. I make it in a personal capacity, as a resident of Somerford Keynes for 27 years and as the ward councillor for Kemble Ward in the neighbouring Cotswold District, which includes the communities and businesses most directly affected by the traffic this development would generate. It is confined to transport and highways matters arising from the formal response of Gloucestershire County Council dated 27 May 2026, and to the bearing of the transport evidence on the climate benefit claimed by the applicant.

I should explain why I, of all people, am objecting to a renewable energy proposal. I hold the climate portfolio at Cotswold District Council. I am a co-author of the Liberal Democrats' national climate policy. I am a graduate of the UK100 Climate Leadership Academy. I founded Thames Head Community Energy, a community renewable energy enterprise. I am, in short, the natural supporter of a well-sited anaerobic digestion plant, and I support the technology in the right location. My objection to this application is a planning objection: the traffic this plant would generate is larger in scale, wider in reach and less controllable than the application models, and the rural road network at the heart of the Cotswold Water Park cannot safely absorb it.

2. What this place is, and how Wiltshire's own policy made it

I have lived in Somerford Keynes for 27 years, so I have watched this area through its whole transformation, and I want to begin by giving credit where it is due. When I arrived, gravel extraction was still active across the area. There was substantial industrial activity, regular HGV movements, processing plant, and mud on the roads. As extraction completed, the development plan did exactly what good planning is supposed to do: the minerals plan's after-use policy for the Water Park (Policy SP5) directed land emerging from extraction towards nature conservation, recreation and tourism, and Wiltshire Core Strategy Core Policy 54 set the vision of the Cotswold Water Park as an informal recreation and leisure resource and an exemplar of sustainability. That policy has succeeded, comprehensively. The result is the Cotswold Lakes we have today: more than 170 lakes across some 40 square miles of the Upper Thames floodplain, a beautiful place to live and to visit, and the foundation of a strong visitor economy. Wiltshire Council should be proud of it.

That success is now measurable. The Somerford Keynes Parish Council business survey of April 2026 records 40 leisure and tourism businesses within 2 kilometres of the application site, with combined annual turnover of more than £43 million, more than 800 staff and more than 700,000 visitors a year. The Cotswold Country Park and Beach alone attracts around 200,000 visitors a year, exceeding 5,000 a day at summer peak, with queues on the approach roads to get in. The Lower Mill Estate is a 550-acre holiday-home community whose houses are occupied for much of the year, and the area supports a hotel, shops, sailing and water-ski clubs and fishing lakes. The lakes now host organised triathlons, cycle races and running

events that put hundreds of swimmers, riders and runners onto these same roads on event days. All of this peak visitor traffic, the queuing for the beach, the second-home weekend flows and the event-day road closures and crossings, runs on precisely the roads this application proposes to load with HGV and tractor-trailer movements. The two uses are not compatible.

Against that background, the applicant's reliance on the road network's industrial past is misleading in two distinct ways. First, the gravel traffic ended more than twenty years ago, and it did not simply lapse: the development plan deliberately retired it and built the present visitor economy in its place. Second, that historic traffic ran on Spine Road East to reach the strategic network. It never ran on Spine Road West, and it never ran on the lanes through and between the villages, which are precisely the roads the fastest delivery routes now use (Figures 1 and 2). The proposal does not continue an established use of these roads. It reverses two decades of the adopted plan's own success.

3. The Gloucestershire County Council response should be given significant weight

On 27 May 2026, Gloucestershire County Council, as Local Highway Authority for the adjoining highway network on which the great majority of this application's traffic impacts will fall, filed a formal response under Article 18 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 (reference WI-2026-059803, signed by Matthew Jopp, Principal Highway Development Officer). The response recommends that the application is refused, and raises a Holding Objection to be maintained until sufficient additional information is provided. GCC's conclusion, at paragraph 14.3, is:

"In the absence of this information, GCC cannot be satisfied that the impacts can be mitigated to an acceptable level or that residual cumulative impacts would not be severe, having regard to NPPF Paragraphs 115 and 116."

The substantive findings are these:

1. The Transport Statement's survey data does not reflect peak seasonal conditions, and the assessment does not demonstrate how the network would operate under realistic operating scenarios (Section 4).
2. There is no detailed origin and destination assessment, so the routing of traffic through the Gloucestershire network "is not clearly understood" (paragraph 4.4), contrary to NPPF paragraph 118.
3. The geographic extent of impact is underestimated. The feedstock catchment may extend to approximately a ten mile radius, reaching settlements such as Meysey Hampton, Poulton, Oaksey and Kemble that the Transport Statement does not identify (paragraph 5.2).
4. The full traffic picture, substantial inbound feedstock deliveries plus outbound digestate movements, has not been comprehensively assessed in scale, routing or timing (paragraphs 6.2 to 6.3).
5. The applicant's assumption that most movements merely redistribute existing agricultural traffic requires further evidence. Centralised flows to a single facility differ materially from dispersed local movements, the importation of poultry litter from the Wye Valley would generate entirely new long-distance HGV trips, and manure and slurry presently retained on farms would become new highway movements (paragraphs 7.2 to 7.3).
6. Digestate spreading is constrained to a seasonal window, potentially around eight months of the year, which may concentrate movements into peak daily volumes exceeding those presented (paragraphs 8.2 to 8.3).

7. The rural network of constrained widths, limited passing opportunities and variable alignment, already carrying agricultural and seasonal tourism traffic, may not safely accommodate the increase, and GCC cannot be satisfied that safe and suitable access can be achieved, having regard to NPPF paragraph 115 (paragraphs 9.1 to 9.4).
8. The practical enforceability of routing is uncertain, because movements will be made by third-party operators whose routing decisions “are often influenced by driver behaviour and satellite navigation systems” (paragraphs 10.1 to 10.4).
9. It is not clear whether National Highways has been consulted in relation to potential impacts on the A419, and this should be clarified (paragraph 11.3).

This is the first substantive cross-boundary highways assessment of the application. Wiltshire Council’s own highways response in June 2023 recorded that sections of the access network, including part of Ashton Road, fall outside Wiltshire’s administrative boundary and that the neighbouring authorities would be expected to comment on the impact on their network. I respectfully invite the committee to give the GCC response significant weight as the formal Article 18 position of the statutory highway authority for the roads that will carry most of this development’s traffic.

4. The routes the network will actually carry (Figures 1 and 2)

GCC identified two gaps that go to the heart of the applicant’s case: the absence of an origin and destination assessment (paragraph 4.4), and the uncertainty of routing where third-party drivers follow satellite navigation rather than a routing plan (paragraph 10.2). The analysis below supplies what the applicant has not.

Figures 1 and 2 show the actual fastest routes from the feedstock farms identified in the applicant’s published catchment plan to the application site, generated using the Google Maps Directions API on its standard fastest-route setting, the same routing logic a driver’s satellite navigation applies. The results were cross-checked against the independent OSRM routing engine running on OpenStreetMap data, which returned the same or slower direct-route times, so the analysis is conservative.

The result is unambiguous: every one of the seventeen farm locations tested has a faster route to the site than the main-road corridor routing shown in the applicant’s Primary Feedstock Routes plan, by between 3 and 24 minutes per one-way trip. From Leigh the direct route is 7 minutes against 31 via the claimed corridor. From Ewen it is 3 minutes against 19. From Upper Minety, 11 against 29. From Purton Stoke, 13 against 31. No commercial operator, and no farm contractor paid by the load at silage harvest, gives up that much time per trip, trip after trip, for 25 years.

As Figures 1 and 2 show, the fastest routes run through the centres of villages: Kemble, with its primary school and railway station, Ewen, Somerford Keynes, South Cerney, Ashton Keynes itself, Minety and Crudwell, and along the Spine Road corridor past the Cotswold Country Park and Beach, Lake 32 and the Lower Mill Estate. This corroborates and extends GCC’s finding at paragraph 5.2 on the geographic reach of the impact.

The enforcement gap is structural, not incidental. Feedstock deliveries will not be made by the applicant’s own fleet. They will be made by independent farmers and their sub-contractors, who have no contractual relationship with the planning authority. A routing condition binds the applicant. It does not bind a third-party tractor driver whose satellite navigation defaults to the fastest route. At the applicant’s own peak figure of up to 160 movements a day during silage harvest, one movement every four to five minutes through the working day, there is no credible mechanism by which compliance could be monitored or enforced across a dispersed rural network for the 25-year life of the plant.

5. What actually moves: the inputs and outputs, in turn

To understand both the traffic and the climate claim, it helps to walk through what this plant actually takes in and sends out, because the two questions are the same question. The climate benefit of anaerobic digestion depends heavily on what is digested and how far it travels: the gains are made in the digester, and they are spent on the road, because every mile is heavy diesel haulage. There is a well-understood hierarchy. The benefit is high where the feedstock is a true local waste, such as manure and slurry from ordinary low-intensity farming, that would otherwise emit methane in storage. It is middling where the feedstock is waste from intensive production hauled long distances, such as poultry litter from industrial-scale units. It is low for purpose-grown energy crops, which require cultivation, fertiliser, diesel and land that would otherwise grow food. On the applicant's own figures, around 45 per cent of the feedstock (41,000 tonnes a year of rye, maize and grass silage) sits in the lowest tier, around one sixth (15,000 tonnes of Wye Valley poultry litter) in the middle tier, and only around one sixth (local slurry and manure) in the unambiguously high tier. Each flow is taken in turn below.

(a) Input: local manure and slurry

This is the climate-positive part of the proposal, and the smallest. It is also entirely new road traffic. Slurry and manure are bulky, low-value materials that are overwhelmingly spread on the holding where they arise: Defra's Farm Practices Survey records that 79 per cent of holdings in England spread manure or slurry on their own grass and arable land (Defra, Farm Practices Survey, February 2025, accredited official statistics). Cattle slurry is typically around 6 per cent dry matter (AHDB Nutrient Management Guide RB209, Section 2), so what is moved is roughly 94 per cent water, which is why it does not normally travel on the public road at all, or only very locally between a farm's own parcels. Peer-reviewed analysis of manure transport chains concludes that moving slurry by agricultural vehicle is uneconomic beyond approximately 3 kilometres (Schnorf et al., "Biomass transport for energy", Journal of Cleaner Production, 2021). Collecting it from farms across a ten mile radius is therefore a pattern of road movement that does not exist today, exactly as GCC finds at paragraph 7.3: "manure and slurry that are presently retained and utilised locally would be transported to and from the facility, creating new highway movements."

The vehicles doing this work are not light farm traffic. As Figure 3 shows to scale, a tractor with a loaded slurry tanker or silage trailer is approximately 16 metres long, within half a metre of a maximum-length articulated HGV at 16.5 metres, and occupies the full 2.55 metre width of an HGV; agricultural combinations may lawfully run wider still, up to 3 metres. And these loads carry their odour with them along the whole of the route travelled unless every vehicle is securely covered and sealed on every journey. Anyone who has driven behind a slurry tanker knows this from experience. With third-party vehicles operated by many different farms and contractors, sealing standards cannot be guaranteed, so the odour footprint of this plant is not the site boundary, it is the road network of Figures 1 and 2.

(b) Input: poultry litter from the Wye Valley

This is the highest-odour feedstock in the proposal, the one where a poorly sealed load or a careless unloading is most noticeable, and mistakes do happen over a 25-year life. It comes from intensive poultry production, so its climate benefit is middling at best, and it is eroded further by distance: the litter is hauled 50 to 60 miles from the Wye Valley, around 100 miles per round trip, in the order of 577 HGV trips a year. These are entirely new long-distance movements on the network (GCC paragraph 7.3). I have checked whether this transport is captured in the applicant's climate arithmetic: nominally yes, but the applicant's own Carbon Calculator models every feedstock and digestate movement, including this one, at a flat 10 miles (Transport worksheet, rows 5 to 19), understating the emissions of the poultry litter haulage by roughly a factor of five. The traffic will use the strategic road network, and GCC notes at paragraph 11.3 that it is not clear National Highways has even been consulted on the A419 impacts. From the A419 the route runs along Spine Road East and through the North End crossroads, directly past the hotel, shops and businesses that operate there, past holiday

homes occupied much of the year, and across the courses used by the running and cycling events.

(c) Input: purpose-grown energy crops

Energy crops are crops grown specifically to be digested: here, 41,000 tonnes a year of rye, maize and grass silage, around 45 per cent of everything entering the plant. They sit at the bottom of the climate hierarchy because they must be cultivated, fertilised and harvested with diesel machinery before they yield any gas, and because the land they occupy would otherwise grow food, a displacement the applicant's carbon model does not assess. They arrive in two concentrated windows, and both are the worst possible timing for this network. The summer harvest coincides exactly with peak holiday season, when the Cotswold Lakes roads are at their busiest and visitors are queuing for the beach. The autumn harvest comes when the fields are frequently saturated, so harvesting damages soil structure, drags mud onto the carriageway and increases surface-water run-off from compacted ground. Section 6 below sets out, from this application's own record, what that meant in practice for one household near Castle Eaton in November 2024.

Nor is this simply the same traffic these fields generate today. A combinable food crop is harvested as grain, around 7 to 8 tonnes per hectare (England average wheat yield 7.1 t/ha in 2024, Defra cereal production statistics), dried and stored on the farm, and then sold and moved over the course of the year, in efficient full HGV loads, to a dispersed range of merchants, mills and feed buyers in whichever direction the market lies. Forage maize for digestion yields around 40 tonnes per hectare fresh weight (AHDB, Growing and feeding maize silage). The same hectare therefore puts five to six times the tonnage onto the road, it is perishable so it moves within days of cutting in continuous tractor-trailer convoys, and every load converges on a single destination instead of dispersing to many. The displaced food and feed production must in turn be grown and transported from somewhere else, traffic the applicant's assessment does not count anywhere.

The harvest timetable also makes the routing problem most acute exactly when the traffic is heaviest. Silage must be cut, carted and clamped within days, so farmers and their contractors are under intense time pressure and are paid by the load. They will take the shortest route, through the villages, not the longer corridor on the applicant's plan, and as set out in Section 4 a planning condition cannot be applied to or enforced against these third parties.

(d) Output: biomethane

The application does not specify where the biomethane goes. The applicant's own Carbon Calculator, however, models the export movement at 50 miles (Transport worksheet, cell D21), consistent with the gas injection facilities in the Banbury area, and the fastest route to Banbury runs along the Fosse Way (A429) through the Cotswolds National Landscape. None of this routing is assessed anywhere in the application. Biomethane export is the genuinely climate-positive output of the plant, but a 100-mile diesel tanker round trip per load erodes that benefit, and the committee is entitled to know the destination, the route and the tanker frequency before weighing it.

(e) Output: carbon dioxide

The CO₂ output generates comparatively little traffic, so the issue here is not transport, it is accounting. The applicant claims 13,714 tonnes a year of saving from "carbon capture", nearly half the headline climate benefit. But the captured CO₂ is sold to the food and drink industry, where it is released back to the atmosphere within weeks or months, when the drink is opened or the packaging removed. Under the international carbon-accounting frameworks (the GHG Protocol and ISO 14064), that is carbon capture and utilisation, not storage, and it is not a net removal: the applicant's own spreadsheet labels the credit "utilisation" (Summary worksheet, cell B18). On standard accounting this line of the climate claim is worth zero, not 13,714 tonnes.

(f) Output: digestate

Around 67,500 tonnes a year of digestate (the applicant's own Transport worksheet) leaves the plant for spreading on the supplying farms: the manure and slurry flows of (a), in reverse, with the same vehicles on the same village routes. The timing is more concentrated than the application presents, because the site and the receiving catchment lie within a Nitrate Vulnerable Zone, so spreading is confined to seasonal windows, and GCC finds at paragraphs 8.2 to 8.3 that this may concentrate movements into peak daily volumes exceeding those assessed. The digestate also carries the same in-transit odour risk as the inbound waste, across the same network, for the same 25 years.

6. What this looks like in practice: the Castle Eaton record

The committee does not need to speculate about whether routing and traffic mitigation of this kind works in practice, because there is a directly comparable precedent a few miles away on the same A419 corridor: the Castle Eaton AD plant in Swindon Borough, operated by Biomethane (Castle Eaton) Limited. In respect of its expansion application S/20/1685, National Highways recommended refusal on 7 October 2024, and on 10 September 2025 reconfirmed that recommendation after the operator submitted revised proposals including a new Transport Statement, a Traffic Management Plan and a haul road specification, concluding that the revised proposals "do not present a viable and enforceable option for mitigating our safety concerns" in respect of the intensified use of the A419/C114 junction. A comparable AD operation, on this corridor, was unable to satisfy the strategic roads authority on the enforceability of its traffic mitigation despite repeated revised submissions. That is the same species of mitigation on which the whole of the present application's highways case rests, at far greater scale.

The lived reality on that same stretch of network is also already documented, on this application's own record. In November 2024 a resident of Water Eaton, beside the A419 at the county boundary by Castle Eaton, reported that a month of agricultural contractor traffic "racing up and down day and night" had left the road impassably muddy, and sought help through her councillors. Wiltshire Council's formal highways inspection response (enquiry reference 00194988) was that the mud "does not meet the intervention levels for repair set out in Wiltshire Council's Safety Inspection Manual" and would simply be monitored. Two weeks later the mud had blocked the drains and the resident's property flooded. That correspondence captures the whole enforcement problem in one episode: agricultural mud on the road in the wet months is foreseeable, the farmer did not act, the highway authority's own intervention thresholds meant it would not act, and the consequence escalated from a hazard to a flood. The autumn energy crop harvest described in Section 5(c) would reproduce those conditions across this network every wet year for 25 years.

Nor is the wider record reassuring about mitigation that depends on operators doing the right thing. The Health and Safety Executive's routine inspections of AD sites, not responses to incidents, found material breaches of safety law at 50 per cent of the 22 industrial AD sites inspected in 2021/22 and 40 per cent of the 49 agricultural AD sites inspected in 2022/23 (Bergin et al., "Explosion safety in anaerobic digestion sites", IChemE Hazards 33, 2023). Compliance with paper controls is the exception in this industry, not the rule, and the applicant has not explained why this site, with more third parties involved than most, would be different.

7. Why unenforceable mitigation is itself a reason for refusal

It may assist the committee to set out why this is not merely a practical complaint but a policy test. NPPF paragraph 57 provides that planning conditions should only be imposed where they satisfy six tests: they must be necessary, relevant to planning, relevant to the development, enforceable, precise, and reasonable in all other respects. The Planning Practice Guidance on the use of planning conditions makes the enforceability test concrete: a

condition is unenforceable where compliance cannot practicably be detected or remedied, and conditions cannot bind parties who have no interest in the land. A routing condition on this permission binds Acorn Bioenergy. It does not, and cannot, bind the independent farmers and haulage contractors who will make the deliveries, who hold no interest in the application site, and whose movements on the public highway the planning system has no power to direct.

The consequence follows mechanically. Where the acceptability of a development depends on mitigation, and that mitigation can only be secured by a condition that fails the paragraph 57 tests, the decision-maker cannot lawfully rely on the condition, and must assess the impacts as if the mitigation were not there. NPPF paragraph 116 then asks whether the residual cumulative impacts on the road network, following mitigation, would be severe. Strip out the unenforceable routing plan, as paragraph 57 requires, and the residual impact is the one shown in Figures 1 and 2: up to 160 HGV-scale movements a day distributed by satellite navigation through village centres. The statutory highway authority for that network has already said it cannot be satisfied those impacts would not be severe. The paragraph 116 test is failed on the applicant's own peak figures.

Refusals on precisely this ground are made and are defensible. Crouchland Biogas (West Sussex, appeal dismissed October 2017) failed on highway danger to other road users among other grounds. Deal Farm, Bressingham (Norfolk, appeal dismissed November 2024) failed on highway safety on narrow rural roads and the handling of its transport plan. Gunby (South Kesteven, January 2025) was refused, against officer recommendation, on rural landscape character and the impact of HGV movements on minor roads. AD refusals grounded in site-specific, policy-led highway evidence are not routinely overturned on appeal.

8. Transport and the claimed climate benefit (NPPF paragraph 168(a))

NPPF paragraph 168(a) directs the committee to give significant weight to the benefits of renewable and low carbon energy generation. On the wording of the paragraph, that weight attaches to the actual benefit of the proposal. Section 5 shows why the actual benefit here is well below the claim: 45 per cent of the feedstock sits in the lowest climate tier, the largest single credit in the claim is utilisation counted as storage, and the haulage that connects every input and output is modelled at a flat 10 miles when the real distances run to 50 miles and more.

I have reviewed the applicant's Carbon Calculation Report myself. Informed by my portfolio experience of carbon accounting for council operations, including the transition of a council fleet to renewable fuels, I concur with the detailed technical analysis of the Report that is already on the record before the committee, and I support the request made there: that the Carbon Calculation Report be independently verified by a chartered engineer instructed by the Council before any weight is attached to it. I note that the same applicant withdrew its comparable Hardwick application (Stratford-on-Avon, 2024) after technical scrutiny.

The two questions are not parallel, they are linked. The claimed climate benefit is the principal consideration the applicant advances against the transport harm. The committee cannot responsibly strike the planning balance under NPPF paragraph 116 while the statutory highway authority for the affected network says the residual cumulative impacts cannot be confirmed as anything less than severe, and the benefit offered in return remains unverified.

9. Conclusion and request

Wiltshire's own policies built the Cotswold Lakes out of a worked-out gravel field, and the visitor economy they created is now one of the development plan's clearest successes. This application would put the heavy traffic back, not on the one road that once carried it, but across the village lanes and recreation corridors that never did, at the times of year when they are

fullest, in vehicles the size of articulated lorries, under routing controls of a kind two statutory highway authorities have concluded cannot be enforced.

I respectfully request that the committee gives the Gloucestershire County Council Article 18 response significant weight, and refuses the application on the ground that it fails the tests in NPPF paragraphs 115 and 116 and conflicts with Wiltshire Core Strategy Core Policies 61 and 62, for the reasons GCC sets out and the routing evidence above corroborates.

In the alternative, determination should be deferred until the further information GCC specifies at paragraph 13.2, a comprehensive origin and destination assessment, evaluation of seasonal and peak conditions, clarification of the redistribution assumptions and assessment of the impacts on the Gloucestershire network, has been provided and GCC has withdrawn its Holding Objection, and until the Carbon Calculation Report has been independently verified.

I would be glad to speak to these points at the committee meeting.

Yours faithfully,

Mike McKeown

Resident, Somerford Keynes

Ward Councillor, Kemble Ward, Cotswold District Council

Cabinet Member for Climate Change and Digital Services, Cotswold District Council

Figures

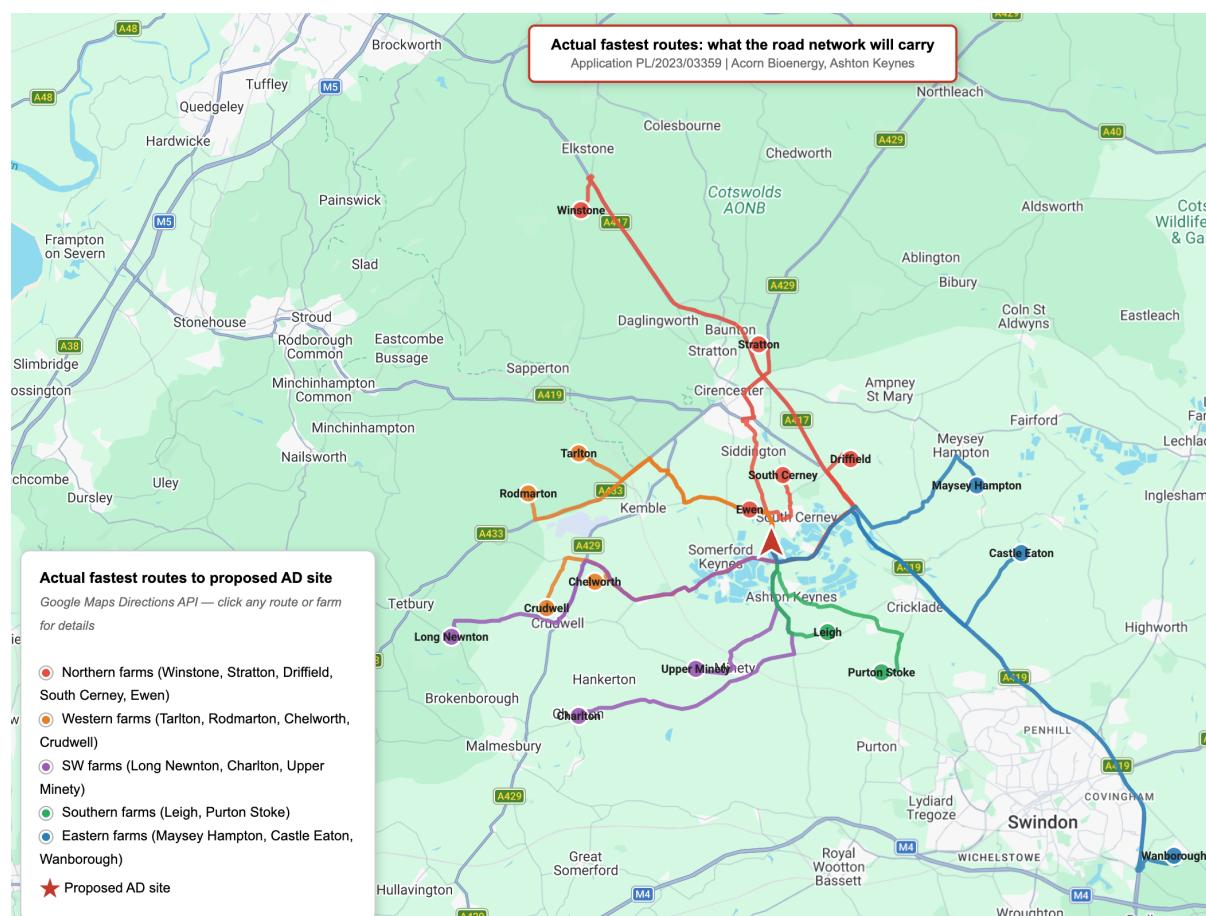


Figure 1. Actual fastest routes from the feedstock farms identified in the applicant's published catchment plan to the application site. Routes generated using the Google Maps Directions API, standard fastest-route setting, queried June 2026. Cross-checked against the OSRM routing engine on OpenStreetMap data, which returned the same or slower times, so this analysis is conservative. All seventeen farm locations tested have a faster route than the corridor routing shown in the applicant's Primary Feedstock Routes plan. Base map and routing © Google.

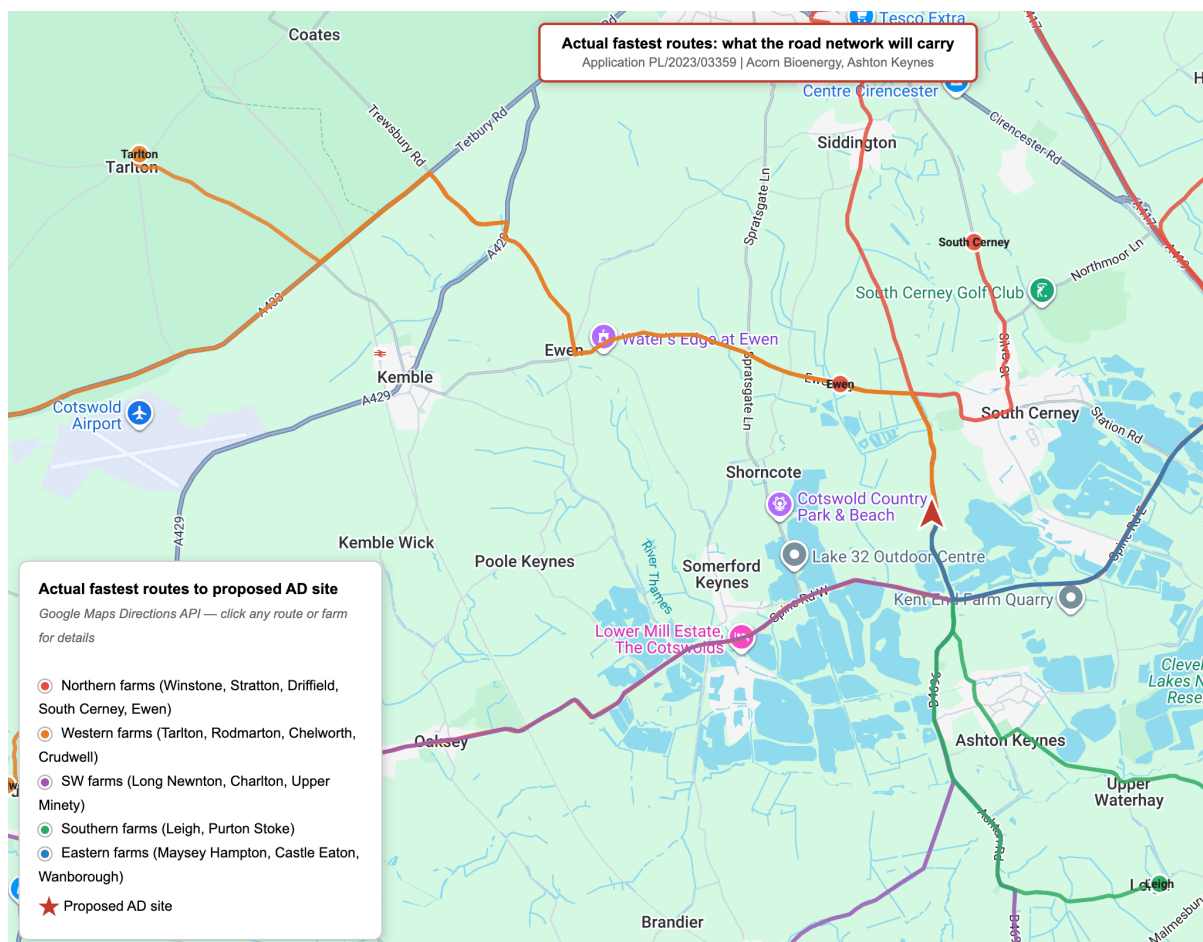


Figure 2. Detail of Figure 1, the Cotswold Water Park area. The fastest routes converge on the site through Kemble, Ewen, Somerford Keynes, South Cerney and Ashton Keynes, and along the Spine Road corridor past the Cotswold Country Park and Beach, Lake 32 and the Lower Mill Estate. Methodology as Figure 1.



Figure 3. Vehicle scale comparison. This is an illustrative graphic created digitally for this representation; it is not a photograph. The dimensions shown are drawn to scale: a maximum-length articulated HGV is 16.5 m long and 2.55 m wide (Road Vehicles (Construction and Use) Regulations 1986, as amended); a typical tractor and slurry tanker or silage trailer combination is approximately 16 m long and occupies the same 2.55 m width, and agricultural combinations may lawfully exceed this, up to 3 m in normal use. A typical family car (4.5 m long, 1.8 m wide) is shown for scale.