



National Highways Planning Response (NHPR 25-01) Formal Recommendation to an Application for Planning Permission

From: Head of Planning & Development, Operations Directorate, SW Region,
National Highways
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To: Wiltshire Council (FAO Ruaridh O'Donoghue)
developmentmanagement@wiltshire.gov.uk

CC: transportplanning@dft.gov.uk
spatialplanning@nationalhighways.co.uk

Council's Reference: PL/2023/03359

Location: Land west of Ashton Road, Ashton Keynes, Wilts, SN6 6QT

Proposal: Construction and operation of anaerobic digestion facility, ancillary infrastructure and construction of new access from Ashton Road

National Highways Ref: NH/26/16546

Referring to the consultation on a planning application referenced above, in the vicinity of the A419 that forms part of the Strategic Road Network, notice is hereby given that National Highways' formal recommendation is that we:

- ~~a) offer no objection (see reasons at Annex A);~~
- b) recommend that conditions should be attached to any planning permission that may be granted (see Annex A – National Highways recommended Planning Conditions & reasons);**
- ~~c) recommend that planning permission not be granted for a specified period (see reasons at Annex A);~~
- ~~d) recommend that the application be refused (see reasons at Annex A)~~

Highways Act 1980 Section 175B is not relevant to this application.¹

¹ Where relevant, further information will be provided within Annex A.

This represents National Highways' formal recommendation and is copied to the Department for Transport as per the terms of our Licence.

Should the Local Planning Authority propose not to determine the application in accordance with this recommendation they are required to consult the Secretary of State for Transport, as set out in the [Town and Country Planning \(Development Affecting Trunk Roads\) Direction 2018](#), via transportplanning@dft.gov.uk and may not determine the application until the consultation process is complete.

The Local Planning Authority must also copy any consultation under the 2018 Direction to Planningsw@nationalhighways.co.uk.

This response and all comments outlined herein are made in respect of planning matters only in National Highways' position as a statutory planning consultee, and does not confer any proprietary rights nor amount to the giving or refusal of consent, assent, approval, or awareness of or by National Highways in or of any other aspects or matters (including, but not limited to, the use of property belonging to National Highways). If anyone wishes for National Highways to consider any aspects which do not relate to planning submissions, they should call our contact centre on 0300 123 5000.

Signature: *G Gallacher*

Date: 11 June 2026

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Position: Assistant Spatial Planner

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Annex A **National Highways' assessment of the proposed development**

National Highways has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

We have undertaken a review of the relevant documents supporting the planning application to ensure compliance with the current policies of the Secretary of State as set out in DfT Circular 01/2022 "The Strategic Road Network and the Delivery of Sustainable Development" and the National Planning Policy Framework (NPPF). This response represents our formal recommendations with regards to planning application reference PL/2023/03359.

Reasons

The application is seeking permission for an anaerobic digestion (AD) facility located to the west of Ashton Road at Ashton Keynes. The site is located approximately 5.3 km from the A419/Cirencester Road junction connected by the local road network comprising Ashton Road and Spine Road East.

National Highways was invited to provide comments on the proposals by the local planning authority on 4 June 2026, prior to consideration of the application by planning committee on 16 June 2026. National Highways interest in the development is the potential impact on the SRN, which in this case comprises the A419. Whilst we are committed to supporting sustainable growth including the production of green energy, our primary consideration must be to ensure the ongoing safe operation of the SRN. It is in this context that our comments are made.

National Highways has considered the Transport Statement dated April 2023 and the Transport Technical Note 01 dated September 2023, both prepared by SLR on behalf of the applicant. It is noted that:

- the development is predicted to generate a worst case of 160 two-way movements per day (HGVs/tractor and trailer) over a two-week period across June/July
- across the remainder of the year movements will average between 72-88 two-way movements per day
- it is accepted that not all movements will utilise the A419/Cirencester Road junction with many movements remaining on the local network surrounding the site, and not all trips will be new as some are expected to replace agricultural movements already on the network
- the predicted trips include the export of CO₂ and biomethane which will generate between 4 and 8 two-way tanker movements a day – most likely all routing via the A419/Cirencester Road junction.

The A419 is dual carriageway and subject to the national speed limit, and the A419/Cirencester Road junction is grade separated. A review of available collision

data does not suggest a collision history associated with the operation of the junction. We therefore consider that the impact of development traffic on this junction is unlikely to be either unacceptable or severe, in safety or capacity terms, in accordance with DfT Circular 01/2022 and the NPPF.

However, we have noted that one of the potential locations for sourcing feedstock, and potentially exporting digestate, is Castle Eaton which is located around 16 km to the south-east of the development site. Movements to and from Castle Eaton are likely to require use of the A419/Water Eaton Lane junction at Seven Bridges which is at-grade and does not meet current design standards. National Highways has previously made clear in its response to proposals to expand operations at the Castle Eaton AD plant that development which materially intensifies use of this junction would be unacceptable on highway safety grounds.

It is accepted that the movement of farm waste off site and the import of fertiliser could be considered to be reasonably typical agricultural activities that could already generate turning movements at the A419/Water Eaton Lane junction, and would therefore already been occurring on the network. The number of potential movements between farms at Castle Eaton and the Ashton Lane development site are also considered not to be comparable in number and frequency to the significant level of trips that were predicted to be generated by the Castle Eaton AD proposal. It also remains to be confirmed that the applicant will contract with farms in the Castle Eaton area.

On balance therefore, National Highways considers that the development could be acceptable subject to a condition to secure an Operational Traffic Management Plan which should consider trip generation and vehicle routing for HGV movements to and from the development site. This should give specific consideration to any arrangements that could potentially generate vehicle movements through at-grade junctions on the A419, in the interest of highway safety.

Recommendation

National Highways recommends that a planning condition should be attached to any permission Wiltshire Council is minded to grant in respect of application PL/2023/03359 to the effect that:

The development hereby permitted shall not be brought into use unless and until an Operational Traffic Management Plan (OTMP) has been submitted to and approved in writing by the local highway authority (in consultation with the strategic highway authority). The development shall thereafter be operated in accordance with the approved OTMP unless otherwise agreed in writing by the local planning authority (in consultation with the strategic highway authority). The OTMP shall include as a minimum:

- i. a defined HGV routing plan identifying the approved routes to and from the development site. HGV routes utilising the A419 shall be required to demonstrate that all reasonable measures will be implemented to minimise additional HGV movements from occurring at at-grade junctions on the A419;

- ii. measures for monitoring agreed HGV routing and ensuring that all vehicles associated with the development comply with their respective approved routing plans;
- iii. measures for the scheduling and management of vehicle movements.

REASON: in the interest of the safe and efficient operation of the strategic road network in accordance with DfT Circular 01/2022.

Standing advice to the local planning authority

The Climate Change Committee's [2022 Report to Parliament](#) notes that for the UK to achieve net zero carbon status by 2050, action is needed to support a modal shift away from car travel. The NPPF supports this position, with paragraphs 77 and 110 prescribing that significant development should offer a genuine choice of transport modes, while paragraphs 109 and 115 advise that appropriate opportunities to promote walking, cycling and public transport should be taken up as part of a vision-led approach.

Moreover, the carbon reduction hierarchy (avoid-switch-improve) as set out in clause 4.3 of PAS2080:2023 promotes approaches and measures to minimise resource consumption and thereby reduce carbon emissions.

These considerations should be weighed alongside any relevant Local Plan policies to ensure that planning decisions are in line with the necessary transition to net zero carbon.