

Wiltshire County Council

Highways Development
Management
Economy Environment and
Infrastructure
Shire Hall
Westgate Street
Gloucester
GL1 2TG

15 June 2026
Your ref: PL/2023/03359
Ask for: Matthew Jopp

Dear Ruairidh O'Donoghue

**TOWN AND COUNTRY PLANNING ACT 1990
(DEVELOPMENT MANAGEMENT PROCEDURE) (ENGLAND) ORDER 2015
ARTICLE 18 CONSULTATION WITH HIGHWAY AUTHORITY**

PROPOSAL: Construction and operation of anaerobic digestion facility, ancillary infrastructure and construction of new access from Ashton Road
LOCATION: Land West of Ashton Road Ashton Keynes Wilts SN6 6QT
APPLICANT: Acorn Bioenergy Ltd

Gloucestershire County Council, the Highway Authority acting in its role as Statutory Consultee has undertaken a full assessment of this planning application. Based on the appraisal of the development proposals the Highways Development Management Manager on behalf of the County Council, under Article 18 of the Town and Country Planning (Development Management Procedure)(England) Order, 2015 recommends that this application is **refused**.

The justification for this decision is provided below.

Introduction

Gloucestershire County Council (GCC), as Local Highway Authority (LHA) for the adjoining highway network within Gloucestershire, has reviewed the note provided by Wiltshire Highways dated 5 June 2026 in response to GCC's consultation response of 27 May 2026.

This supplementary response is provided to clarify GCC's position and to confirm that its previous response is maintained.

Status of GCC Response

GCC notes the statement within the Wiltshire Highways response that the matters raised by GCC "would not have been given any weight" in their assessment.

GCC considers it important to clarify that the attribution of weight to consultation responses is a matter for the Local Planning Authority as decision-maker, rather than for a consultee.

GCC's response identifies material cross-boundary impacts on the Gloucestershire highway network, which are relevant planning considerations and must be taken into account in the determination of the application.

GCC further notes that Wiltshire Highways' response dated 21 June 2023 expressly stated that:

"the access roads to the north of the application site, including a section of Ashton Road, falls outside of the Wiltshire Council administrative boundary, and the neighbouring authorities will be expected to make comments regarding the impact on their highway network."

This confirms that cross-boundary impacts are recognised by Wiltshire Council as a relevant consideration, and GCC's response is provided within that context.

Scope of Assessment

GCC's response relates specifically to the likely impacts of the development on the Gloucestershire highway network, including rural routes and settlements beyond the Wiltshire administrative boundary.

The suggestion that these impacts are not material to the assessment of the development is not accepted.

The National Planning Policy Framework requires consideration of the effects of development on transport networks, including those extending beyond administrative boundaries, where such impacts arise.

Response to Wiltshire Highways Technical Position

GCC notes that the Wiltshire Highways response introduces no new transport evidence and relies on the same data, assumptions and conclusions previously reviewed.

The response does not address the key matters raised by GCC, including the absence of a detailed origin-destination assessment, the lack of seasonal and peak flow analysis, the uncertainty associated with traffic redistribution assumptions, the suitability of the rural highway network, and the practical enforceability of routing strategies.

The reliance on a single-week Automatic Traffic Count undertaken in September 2022 remains a limitation of the assessment and does not reflect peak seasonal conditions associated with the Cotswold Water Park.

The response also does not address the highway safety matters raised in Section 12 of GCC's original response, including the potential for increased conflict between HGV movements and pedestrians, cyclists and equestrians on constrained rural routes. These matters relate to the highway safety element of the NPPF Paragraph 116 test, which remains unassessed.

Use of Capacity Metrics

GCC notes the reliance within the Wiltshire Highways response on the proportion of HGV traffic as an indicator of network capacity.

The percentage composition of HGVs within a traffic stream does not, in itself, determine whether a development would give rise to acceptable or severe impacts under the NPPF.

The assessment of transport impacts requires consideration of routing, network characteristics, peak conditions, and interactions between different road users, particularly on constrained rural roads.

Continuing Uncertainty

GCC's concerns as set out in its response of 27 May 2026 remain unchanged.

There remains insufficient information to demonstrate:

- the routing and distribution of development-related traffic across the Gloucestershire network;
- the operation of the network under peak seasonal conditions;
- whether the scale and nature of traffic movements has been accurately represented; and
- whether impacts can be mitigated to an acceptable level.

These matters are fundamental to the proper assessment of transport impacts.

Position

Gloucestershire County Council confirms that its response of 27 May 2026 is maintained in full.

GCC cannot be satisfied, on the basis of the information currently available, that:

- safe and suitable access can be achieved or that impacts on the network can be mitigated to an acceptable degree (NPPF Paragraph 115); or
- there would not be an unacceptable impact on highway safety, nor that the residual cumulative impacts on the road network would not be severe (NPPF Paragraph 116).

Conclusion

GCC's position remains that further information is required in accordance with NPPF Paragraph 118 to enable the likely impacts of the development to be properly assessed and monitored.

GCC requests that it is re-consulted on any further transport information submitted by the applicant, with sufficient time to review and respond prior to the application being reported to Planning Committee.

GCC would welcome continued engagement with Wiltshire Council and the applicant to seek to resolve the outstanding transport matters.

Yours Sincerely

Matthew Jopp
Principal Highway Development Officer