

APPLICATION FOR FULL PLANNING PERMISSION OFFICER COMMITTEE REPORT

Date of Meeting	14 th July 2026
Application Number	PL/2023/03359
Site Address	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
Applicant	Mr Charlie Lywood
Town/Parish Council	Ashton Keynes CP
Electoral Division	Minety
Type of application	Full Planning
Case Officer	Ruaridh O'Donoghue
Reason for the Application being reported to Planning Committee	Called in due to scale, visual impact, relationship with adjoining properties, design and environmental / highways impact.

RECOMMENDATION: That planning permission be GRANTED, subject to delegation to the Head of Development Management for the completion of a Section 106 agreement legal agreement (or Unilateral Undertaking) covering the matters set out in this report section/paragraphs 6.15, and subject also to the planning conditions.

EXECUTIVE SUMMARY

This application was originally considered by the Committee at its meeting on the 21st April 2026, where it was resolved to DEFER a decision on the application so that consultation with Gloucestershire County Council Highways and Thames Water could take place.

Section 38(6) of the Planning and Compulsory Purchase Act 2004 and S70(2) of the Town and Country Planning Act 1990 require that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise.

This report constitutes an updated and complete officer assessment of the application, incorporating all additional information and consultation responses received since the previous committee report. It should therefore be read as a standalone report in its entirety.

This application seeks full planning permission for an anaerobic digestion facility and associated infrastructure on agricultural land west of Ashton Road, Ashton Keynes. The site lies in open countryside within the wider Cotswold Water Park landscape but outside any statutory landscape designation.

The principal issues are the principle of development in the countryside; landscape and visual impact; traffic and highway safety; ecology and biodiversity; amenity (including noise, odour and air quality); flood risk and drainage; the loss of agricultural land; and the relationship with waste and environmental permitting regimes.

Officers conclude that the proposal would give rise to identifiable and localised landscape and visual harm, which is afforded moderate weight in the planning balance. The proposal would also result in the temporary loss of agricultural land, including a limited proportion of Best and Most Versatile land, which is afforded limited weight having regard to the site-specific characteristics and constraints of the land.

In highway terms, Wiltshire Council as Local Highway Authority raises no objection and is satisfied that the development would not result in an unacceptable impact on highway safety or a severe residual cumulative impact. While an objection has been received from Gloucestershire County Council in respect of cross-boundary impacts, this is based on concerns regarding the level of information submitted rather than evidence of severe impact, and officers are satisfied that the proposal complies with national and local transport policy. National Highways raises no objection subject to securing further controls through the Operational Traffic Management Plan.

However, having regard to the non-designated status of the landscape, the revised scale and design of the development, the extensive mitigation proposed, and the enforceable restoration of the site following decommissioning, officers consider that the identified harms would not undermine the overall integrity of the Cotswold Water Park landscape.

Significant weight is afforded to the renewable energy generation, carbon reduction, energy security and rural economic benefits of the proposal, which are considered to outweigh the identified harms. The development is therefore recommended for approval in accordance with the development plan and the NPPF.

PLANNING OBLIGATIONS AND CONDITIONS

Obligations

An Obligation will be necessary to secure the off-site Skylark mitigation.

Conditions

The application is acceptable, subject to the conditions and informatives included within this report, covering the following matters:

1. Time Limit
2. Approved Plans
3. Temporary Development, Decommissioning & Restoration
4. Construction Management
5. Highway & Transport Matters
6. Drainage, Groundwater & Flood Risk

7. Ecology, Biodiversity & Landscape
8. Amenity Protection
9. Land Quality & Contamination
10. Pollution Prevention & Environmental Control

1. **PROPOSED DEVELOPMENT SITE AND SURROUNDINGS**

Site location

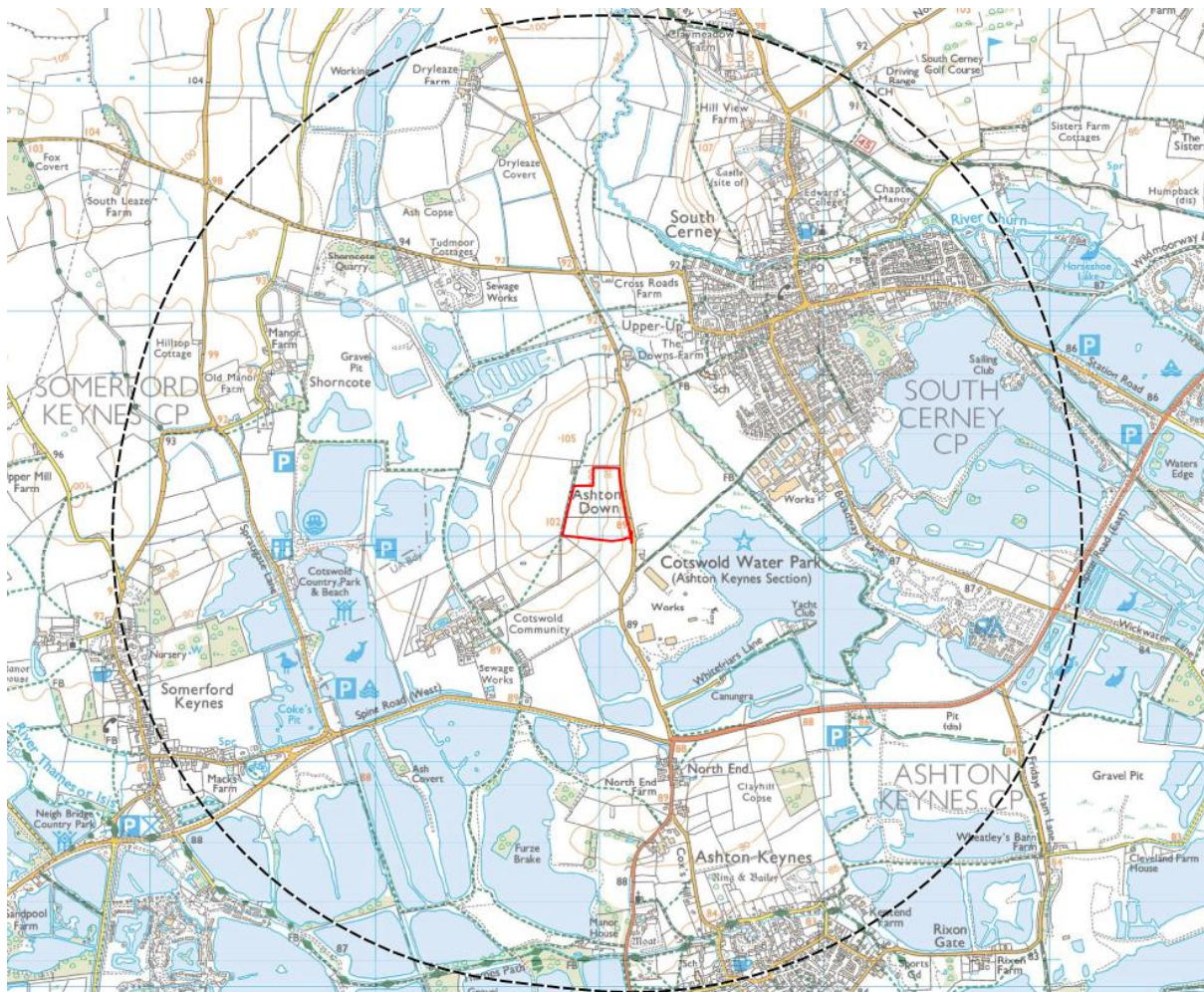


Figure 1 – Site Location Plan

Site Description

The application site comprises approximately 6.99 ha of agricultural land located immediately west of Ashton Road, around 2 km north of Ashton Keynes and close to the Wiltshire–Gloucestershire border. The land sits within the wider Cotswold Water Park landscape, a large area shaped by historic mineral extraction and now characterised by a mosaic of restored lakes, agricultural land, leisure uses and holiday accommodation. For context, WCS Core Policy 54 recognises that the Cotswold Water Park’s lakes “have been created from decades of sand and gravel extraction” and that this activity is “set to continue for many years”, meaning

the Water Park is a landscape that has evolved and will “continue to change” in response to “a complex interplay of physical and human influences.” It is also described as a “significant green infrastructure asset” comprising lakes, rights of way, recreation and nature study areas. In applying landscape policy, WCS Core Policy 51 is also explicit that landscape functions include “places to live, work, relax and recreate”, reflecting that this is a working and lived-in landscape as well as a recreational resource. These policy statements are material when judging sensitivity and the weight to attach to change within this part of the Water Park. Although the Water Park contains extensive visitor attractions, the application site itself is separated from the nearest lakes and recreational land and does not fall within the SSSI.

The site is currently undeveloped farmland and forms part of a rural landscape influenced by both agriculture and mineral restoration. The immediate surroundings include a mixture of land uses: restored and active quarry workings; residential clusters associated with the former Cotswold Community redevelopment approximately 335m to the southwest; a trading estate/business park roughly 526m to the east; and an Aggregate Industries facility around 120 m to the south. This combination means the local context is neither wholly rural nor wholly industrial, but a transitional semi-rural environment (see figure 2 below).



Figure 2 – Aerial Photo of Site Surroundings

Access is taken directly from Ashton Road, which connects to Spine Road East and onward to the A419 dual carriageway, with all HGV movements required to route via the A419 and B4696 Spine Road, secured through condition without the need to travel through villages or directly past residential frontages.

The site contains a central ditch and hedgerow running west–east, with further hedgerows along the northern, eastern and much of the western boundaries. The southwest corner is more open and currently used for agricultural access. Levels fall from east to west across the site, from approximately 102.25 m AOD along the eastern boundary to around 89.75 m AOD in the southeast corner. At a wider scale, the site lies on the eastern flank of Ashton Downs, an isolated local hill form that influences the visual context.

Constraints:

- Located in open countryside, outside any defined settlement boundary.
- Not within a designated landscape; the Cotswold National Landscape lies approximately 5 km to the northwest, and the North Wessex Downs National Landscape approximately 17 km to the south.
- The site is within Flood Zone 1, and avoids SSSIs, ancient woodland and heritage assets. The nearest ecological designation is the Cotswold Water Park (Cotswold Lakes) SSSI, the nearest parts of which lie about 300 m away.
- Agricultural Land Classification: The site has been subject to a detailed site-specific Agricultural Land Classification survey which identifies a mix of Grade 2, Subgrade 3a and Subgrade 3b land. The majority of the site comprises Subgrade 3b (i.e. not best and Most Versatile) land.
- No public rights of way cross the site, although several routes exist in the surrounding area.
- The site lies within a Mineral Safeguarding Area: sand and gravel.

Site Photographs



View from Ashton Road at the northeastern end of the site looking in a south westerly direction © Google



View from Ashton Road at the site entrance looking in a westerly direction © Google



View from Ashton Road at the southeastern end of the site looking in a north westerly direction © Google

Proposal

The proposal is for the construction and operation of an anaerobic digestion (AD) facility on approximately 7 ha of agricultural land off Ashton Road. The facility would process around 91,000 tonnes of agricultural feedstock per annum, comprising rotational break crops (rye, maize, grass), straw, farmyard manure, slurry and a small proportion of poultry litter, predominantly sourced from farms within a 10-mile radius (see figure 3 below).



Figure 3 – Proposed Site Plan

The AD process would produce approximately 10 million m³ of renewable biomethane annually, transported by biomethane-fuelled road tankers to the applicant's gas injection hub at Banbury, together with natural digestate fertiliser (c.120,000 tpa) for local agricultural use and high-grade CO₂ for commercial distribution.

The key built components (as amended by the 2024 Design Changes and 2025 Design Refinements) are as follows:

- Primary & Secondary Digesters (x2)
 - 45 m diameter
 - 9 m straight-wall height
 - Flat-topped
- Post-Digester Tank (x1)
 - 34 m diameter

- 16.5 m overall height
- Silage Clamps (x3)
 - Clamps 1 & 2: 101 m x 35 m
 - Clamp 3: 124 m x 35 m
 - All 3.5 m high
- Straw Processing Building (x1)
 - 43 m x 23 m
 - 9.2 m ridge height
- Chicken Manure Reception Building (x1)
 - 26 m x 19.5 m
 - 8.1 m eaves / 9.2 m ridge
 - 10.2 m exhaust stack
- Covered Digestate Lagoons (x2)
 - 8,000 m³ each
 - HDPE-lined with floating covers and abatement vents
- CO₂ Capture Unit
 - 10 m x 16 m x 4.75 m
 - Two associated storage tanks (13 m x 3 m)
- Biogas Upgrade Unit
 - 26 m x 9 m footprint
 - 7.5 m vent
- CHP Units (x2)
 - 13 m x 3 m x 3 m
 - 9 m stacks
- Compressors (x2)
 - 6.5 m x 3 m x 3 m
 - 9 m stacks
- Rainwater lagoon (2,000 m³)
- 70 m internal access road, weighbridge and office
- 5 HGV bays and 8 staff/visitor spaces

Since the application was first submitted in 2023, the design has been subject to two major rounds of revision: the 2024 Design Changes and the 2025 Design Refinements. Together, these amendments have significantly reduced the visual massing of the proposal and strengthened both environmental and operational mitigation. The key changes are:

- Lowered site levels to reduce the apparent height and bulk of buildings and tanks.
- Reduction of digesters from five to three, comprising two flat-topped 9 m tanks and one 34 m domed post-digester (16.5 m), substantially reducing vertical massing.
- Reduction in manure reception building height from 13 m to 9.2 m, following discussions with the Council's Landscape Officer.
- Substantial enlargement and thickening of structural landscape planting, with approximately 40% of the site now dedicated to habitat creation and screening.
- New native willow screen added along the site entrance to reduce visibility of the gatehouse and welfare cabins (2025 refinement).
- Creation of an off-site wildflower meadow within the applicant's blue line to maximise biodiversity net gain.

- Updated lighting strategy to meet ILP E2 (rural) standards, including strict light-spill control and no lighting to the access road mouth.
- Enhanced odour controls, including full enclosure of feedstock handling and abated displacement air, with all manure unloading now contained inside the building.

The applicant asserts that these changes reflect a landscape-led design evolution, directly responding to consultee feedback and resulting in a materially less prominent and better-mitigated development (see figure 4 below).

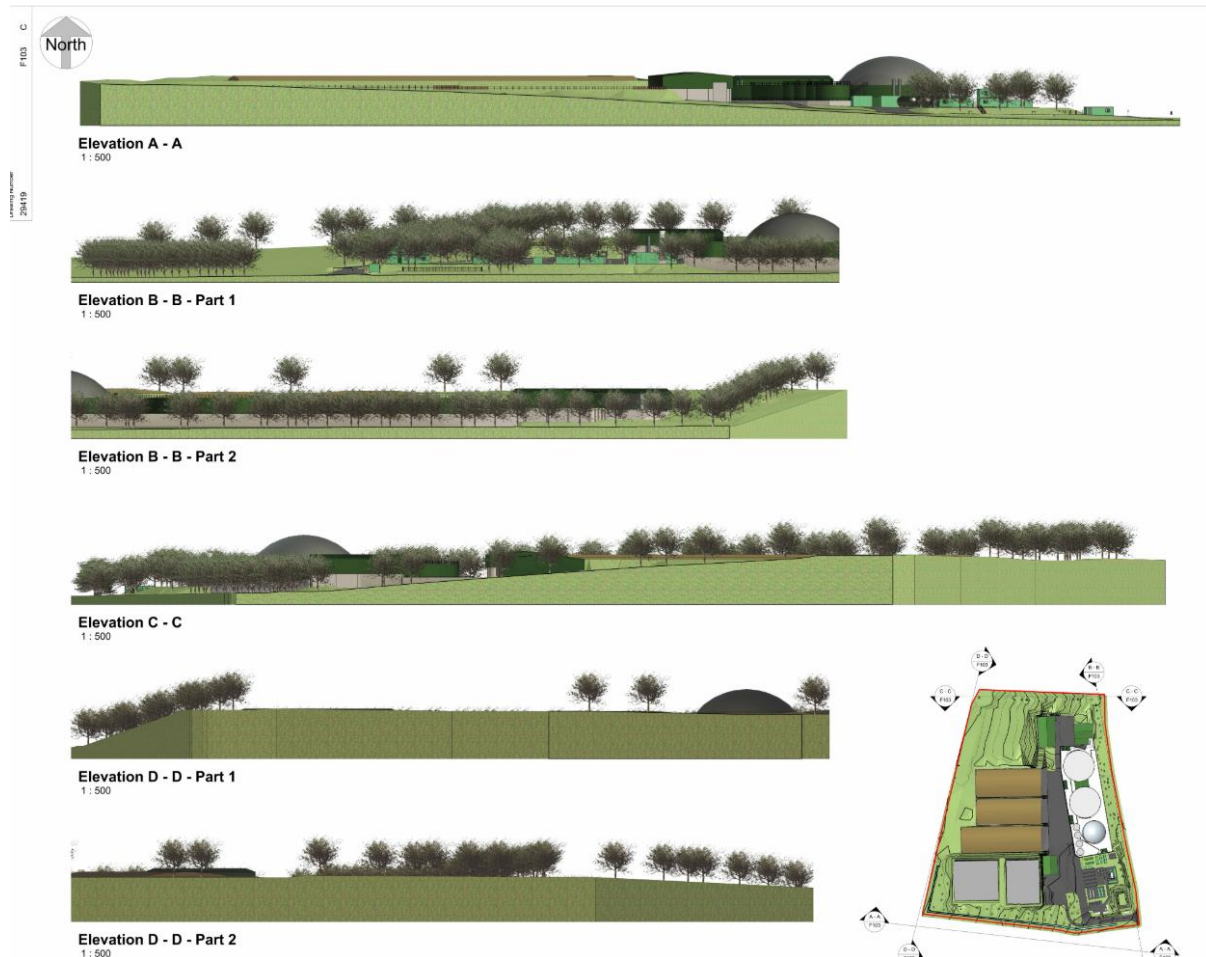


Figure 4 – Site Levels - Cross Sections

Operational details:

- The AD process uses the controlled, oxygen-free decomposition of organic material over a 50-day retention period, generating biogas which is cleaned and upgraded to biomethane.
- Digestate is separated into liquid and solid fractions:
- Liquid digestate is stored in covered, abated lagoons ($2 \times 8,000 \text{ m}^3$) for reuse as fertiliser.
- Solid digestate is stored under cover before export.
- Food-grade CO_2 is captured to 99.9% purity and exported for use in commercial sectors.

- The plant operates 24/7, with typical staffing between 07:00 and 18:00, supplemented by automated SCADA monitoring outside staffed hours.
- Vehicle movements remain consistent with the original assessment: approximately 38–44 HGV/tractor trips per day, rising temporarily during harvest. Biomethane export occurs by tanker every 12 hours.

Locational Rationale

The site selection reflects both operational necessity and planning policy considerations:

- Proximity to feedstock sources and digestate markets within a well-established agricultural catchment ensures short transport distances, reduces emissions, and supports local farm businesses.
- Direct access to the Spine Road East and A419 dual carriageway, without passing through villages or residential streets, provides a safe, strategic route for HGVs and will be the sole approved routing corridor for all HGV traffic associated with the development.
- No viable option for direct pipeline connection exists locally; the applicant therefore relies on biomethane-fuelled tankers to its Banbury injection hub.
- The 7-ha site is of sufficient size to accommodate AD process infrastructure while still delivering substantial landscape mitigation and biodiversity net gain.
- The site avoids designated landscapes, lies outside the Cotswold National Landscape, and is well separated from the Cotswold Lakes SSSI.
- It sits within a semi-rural area already influenced by modern agriculture, mineral extraction, utilities and industrial land uses, consistent with national guidance that renewable energy development may be appropriately located beyond settlements where landscape impacts are acceptable.

Taken together, the site achieves a functional and policy-aligned location for a facility of this nature, supporting both rural economic diversification and the wider transition to renewable, low-carbon energy.

2. RELEVANT PLANNING HISTORY

There is no relevant planning history pertaining to the site.

3. RELEVANT PLANNING LEGISLATION, POLICIES AND GUIDANCE

National Planning Policy:

- National Planning Policy Framework (NPPF) [National Planning Policy Framework - GOV.UK](#)
- Planning Practice Guidance (PPG) [Planning practice guidance - GOV.UK](#)
- National Design Guide [National design guide - GOV.UK](#)

Development Plan:

The development plan for Wiltshire comprises the *Wiltshire Core Strategy (WCS)* (adopted January 2015), any made neighbourhood plans, together with the Wiltshire Housing Site Allocations Plan and the Chippenham Site Allocations Plan. These remain the principal statutory planning document guiding development across the county.

In line with Section 38(6) of the Planning and Compulsory Purchase Act 2004, planning decisions must be made in accordance with the development plan unless material considerations indicate otherwise. Though the development plan is considered as a whole, those parts deemed to be particularly relevant to this application are listed below:

The adopted **Wiltshire Core Strategy (WCS)**, with particular regard to:

- Core Policy 1 Settlement Strategy;
- Core Policy 2 Delivery Strategy;
- Core Policy 3 Infrastructure Requirements;
- Core Policy 13 Spatial Strategy for the Malmesbury Community Area
- Core Policy 41 Sustainable Construction and Low-Carbon Energy;
- Core Policy 42 Standalone Renewable Energy Installations
- Core Policy 50 Biodiversity and Geodiversity;
- Core Policy 51 Landscape
- Core Policy 52 Green Infrastructure
- Core Policy 54 Cotswold Water Park
- Core Policy 55 Air Quality;
- Core Policy 56 Contaminated Land;
- Core Policy 57 Ensuring High Quality Design and Place Shaping;
- Core Policy 58 Ensuring the Conservation of the Historic Environment;
- Core Policy 60 Sustainable Transport;
- Core Policy 61 Transport & Development;
- Core Policy 62 Development Impacts on the Transport Network;
- Core Policy 63 Transport Strategies
- Core Policy 64 Demand Management
- Core Policy 65 Movement of Goods
- Core Policy 66 Strategic Transport Network
- Core Policy 67 Flood Risk;
- Core Policy 68 Water Resources

Appendix D of WCS – Relevant Saved Policies of North Wiltshire Local Plan 2011

- NE18 – Noise and Pollution
- NE14 – Trees, site features and the control of development

Neighbourhood Plan - Ashton Keynes Neighbourhood Plan (Made May 2017)

The Plan's vision seeks to ensure that development within the Parish occurs in harmony with its rural character, landscape setting and environmental sensitivities, particularly given its

location within the Cotswold Water Park and the Upper Thames catchment. Key policies include:

- *INP1 – Flood Risk Mitigation*
- *INP2 – Road & Pedestrian Safety*
- *INP4 – Communications Infrastructure (limited relevance but supports improved digital connectivity)*
- *ENP1 – Protection of Biodiversity & Wildlife Sites*
- *ENP2 – Environmental Infrastructure & Accessibility*
- *ENP3 – Landscape Character & Tranquillity*
- *HCP1 – Local Character*
- *ECP1 – Employment Land*
- *ECP2 – Former Minerals Extraction & Manufacturing Sites (contextually relevant for development in the Cotswold Water Park landscape)*
- *ECP3 – Recreation & Tourism (indirect relevance as it concerns the Water Park setting)*

Link to Neighbour Plans:

[Neighbourhood planning - Wiltshire Council](#)
[Latest progress - Wiltshire Council](#)

Wiltshire Waste Policies

Anaerobic digestion (AD) plants can manage a broad range of materials, such as agricultural manure and slurry, sewage sludge and food waste as well as purpose-grown crops (biomass). The proposed Ashton Keynes AD Plant would accept a feedstock off rotation break crops (including silage, rye, maize and grass), straw, and farmyard manures from local farms. No food waste, green waste, catering waste or material from non-agricultural holdings would be imported.

The proposed feedstock for this plant has traditionally been viewed as non-waste materials, with planning applications for such AD developments being considered under WCS Core Policy 42: Standalone renewable energy installations. However, since submission of this application the High Court has ruled that manure can be waste within the Planning Acts. It is therefore considered appropriate to also assess this application against the council's planning policies for managing waste management development. The relevant policies are:

Wiltshire and Swindon Waste Core Strategy 2009

- WCS3: Preferred Locations of Waste Management Facilities by Type and the Provision of Flexibility
- WCS5: The Wiltshire and Swindon Waste Hierarchy and Sustainable Waste Management

Wiltshire and Swindon Minerals and Waste Development Control Policies DPD (2009)

- Policy WDC1: Key Criteria for Ensuring Sustainable Waste Management Development
- Policy WDC2: Managing the Impact of Waste Management
- Policy WDC3: Water Environment
- Policy WDC4: Protection of Recreational Assets
- Policy WDC5: Canals and Railways
- Policy WDC6: Airfield Safeguarded Areas
- Policy WDC7: Conserving Landscape Character
- Policy WDC8: Biodiversity and Geological Interest
- Policy WDC9: Cultural Heritage
- Policy WDC10: Restoration of Waste Management Sites
- Policy WDC11: Sustainable Transportation of Waste
- Policy WDC12: Renewable Energy
- Policy WDC13: Landfill Development

Link to various documents:

[Planning and building control - Wiltshire Council](#)

[Wiltshire Core Strategy - Wiltshire Council](#)

[Saved policies from District Local Plans - Wiltshire Council](#)

[Waste Development Control Policies DPD 2009](#)

Draft Wiltshire Local Plan Policies

At Full Council on 19 May 2026, the elected members of Wiltshire Council agreed to withdraw the emerging Wiltshire Local Plan. It will now be subject to a legal process to finalise its withdrawal - which is likely to happen in July or August (2026). The said Plan has no material weight for the purposes of the application.

Supplementary Planning Documents/Guidance:

- Wiltshire Design Guide (adopted April 2024)
- Air Quality SPD (due to be Adopted in October 2025)

Other Relevant Policies and Documents:

- Wiltshire Local Transport Plan 2011-2026, adopted 2015 - including the Car Parking Strategy and Cycling Strategy, adopted 2015
- A Green & Blue Infrastructure Strategy for Wiltshire: Wiltshire's Natural Environment Plan 2022-2030

Link to documents:

[Wiltshire Design Guide - Wiltshire Council](#)

[Wiltshire Local Transport Plan - Wiltshire Council](#)

[Local Cycling and Walking Infrastructure Plans \(LCWIPs\) - Wiltshire Council](#)

[Air quality - Wiltshire Council](#)

[Biodiversity, landscape and design - Wiltshire Council](#)

4. SUMMARY OF CONSULTATION RESPONSES

WC Highways: No objection subject to conditions

WC Conservation: No objection

WC Archaeology: No objection subject to conditions.

WC Public Protection: No objection subject to conditions

WC Landscape: Objection regarding the landscape impact of the proposal.

WC Ecology: No objection

WC Drainage: No objection subject to conditions

WC Arboricultural: No objection subject to conditions

Environment Agency: No objection subject to conditions

Natural England: No objection subject to appropriate mitigation being secured

Thames Water: No objection – advisory comments

Gloucester County Council Highways: Holding objection until sufficient additional information is provided to demonstrate that the impacts on the Gloucestershire highway network have been fully assessed and can be appropriately mitigated. This position reflects a request for additional supporting information, particularly in relation to routing and seasonal sensitivity, rather than a concluded professional view that the development would result in an unacceptable or severe impact on the highway network.

Civil Aviation Authority: No comments received at the time of writing the report.

Ministry of Defence: No comments received at the time of writing the report.

National Highways: No objection subject to conditions

Cotswold District Council – Key Concerns:

- Concern regarding the scale of the proposed facility and the anticipated vehicle movements, with potential adverse impacts on the local road network.
- Request for highways consultation to ensure no harm to the highway network within the neighbouring authority area.
- Acknowledgement that a Landscape and Visual Impact Assessment (LVIA) has been submitted and provides a fair account of likely effects during construction and operation.

- Recognition that significant effects are anticipated, though considered localised and potentially mitigated over time through the proposed landscape strategy. [\[](#)
- The Preliminary Ecological Appraisal indicates further survey work is required, including bat surveys.
- Concern regarding potential impacts on the Cotswold Water Park SSSI, located close to the site.
- Lack of clarity as to whether a full Ecological Impact Assessment (EclA) has been submitted.
- Request that, should permission be granted, conditions secure an Odour Management Plan and a Dust Management Plan prior to first use.
- Importance of odour control highlighted due to nearby settlements and prevailing wind direction.
- Expectation that operational noise levels should not exceed those predicted in the submitted acoustic information.
- Request for measures to ensure surface water is intercepted to prevent pollution of local watercourses, having regard to the proximity of the SSSI.

Ashton Keynes Parish Council – Key Concerns:

- Strong and continued objection despite amendments; core issues remain unaddressed.
- Industrial-scale development inappropriate in rural Cotswold Water Park setting.
- Harm to tourism economy; AD plant incompatible with a visitor-based landscape and risks loss of local jobs.
- Very narrow and dangerous access routes (Ashton Road and B4696 crossroads – noted accident cluster).
- Significant increase in HGV/tractor movements, especially in summer crop-season; cumulative impacts with Steadings (2,350 homes) and Wheatley's Farm Quarry.
- No local benefit: village not on gas grid; residents bear harm but do not receive energy.
- Very close to Ashton Keynes, South Cerney, and 75-home Cotswold Community redevelopment.
- Proximity to and potential impact on SSSI; biodiversity risks, water contamination concerns.
- Air quality and odour concerns, including methane and unpleasant emissions.
- Questions over sourcing of 91,000 tonnes of feedstock and credibility of carbon/traffic assumptions.
- Environmental permit unlikely due to proximity to SSSI and Source Protection Zones.
- Lack of assessment of alternatives and cumulative impacts; failures in EIA content (no EclA, no alternatives, no decommissioning plan).
- Visual harm and landscape impact, including night-time lighting.
- Concerns over groundwater contamination and inadequate SuDS removal in revised drainage design.

South Cerney Parish Council – Key Concerns:

- Maintains strong objection; JBA hydrological technical note supports refusal.
- Applicant fails to recognise unsuitable location; significant landscape harm.

- Serious concerns about proximity to Ann Edwards Primary School and playgroup; risks to children not assessed.
- No proper assessment of emissions (SO_x, NO_x, PM, ammonia, CO₂/CH₄), odour or cumulative air quality effects (including existing Shorncote WwTW odours).
- Risks to nearby SSSI lakes and groundwater; inadequate drainage assessment and dangerous assumptions about ditch discharge.
- No HRA despite proximity to SSSI; failure to assess impacts on North Meadow SAC.
- Road network wholly unsuitable: narrow rural roads, dangerous junctions, high existing HGV loads; omissions in cumulative highways analysis (Gloucestershire roads, quarry, Steadings).
- Failure to consider end-use emissions (post-Supreme Court Finch ruling).
- No comparative assessment of alternative sites; no assessment of cumulative environmental impacts.
- Harm to Cotswold Water Park tourism businesses; no assessment of cyclist safety or recreation impacts.
- Landscape corridor importance understated; adverse visual and tranquillity impacts.
- Lack of Environment Agency permit; no clarity on decommissioning, lifecycle emissions or net-zero compliance.
- Doubts over ability to source feedstock locally; major vehicle emissions undermine carbon-saving claims.
- Risks of methane/biogas leaks; impacts of maize-based feedstock on soil health and food security.

Somerford Keynes Parish Council – Key Concerns:

- Strong objection; amendments do not reduce overall harm.
- Industrial plant inappropriate in rural landscape; 24-hour lighting, noise, flare and visual intrusion.
- Location adjacent to Cotswold Water Park SSSI, Conservation Area, and key recreational lakes (Lake 32, Country Park & Beach).
- Significant HGV/tractor increases (quoted 88 daily movements) posing major safety hazard on narrow rural roads; seasonal traffic peaks will worsen congestion.
- Air pollution concerns from diesel traffic, plant operations, and odours.
- Risk of liquid or gas leakage causing ecological harm; dangers from transporting compressed gases.
- Disturbance to tranquillity, ecology and tourism in a heavily visited leisure area.
- Inadequate consideration of alternative brownfield or industrial sites.

Kemble and Ewen Parish Council – Key Concerns:

- The Council objects to the application on the basis that the transport impacts on Kemble, Ewen and the surrounding rural road network would be unacceptable, unmitigated and contrary to both national and local planning policy.
- The proposed development would generate significant agricultural vehicle movements, including tractor-trailers and digestate tankers, along unsuitable rural roads. In particular, routes through Ewen—a small hamlet with no footways—and along the A429 would give rise to highway safety risks for pedestrians, cyclists, horse riders and local traffic.

- The submitted routing strategy is considered unenforceable. Gloucestershire County Council has advised that there is no realistic mechanism to ensure compliance, and that in practice vehicles are likely to use the most direct routes through rural villages. As a result, the impacts on the actual road network affected have not been properly assessed.
- Seasonal agricultural traffic is likely to result in mud and debris being deposited on the highway, particularly during autumn harvesting periods, increasing skid risk and reducing visibility.
- There are concerns regarding odour from the transport of slurry, manure and digestate. Given that vehicles would be operated by third-party contractors, consistent sealing cannot be guaranteed, with potential harm to residential amenity.
- Due to the unenforceable routing and lack of robust assessment, the cumulative traffic impact on the rural network is considered likely to be severe, contrary to paragraph 116 of the NPPF and Wiltshire Core Strategy Core Policies 60 and 61.
- Increased HGV and agricultural traffic would also adversely affect the safety and amenity of users of the Thames Path, which runs adjacent to the road between Kemble and Ewen, including schoolchildren and recreational users.

5. SUMMARY OF REPRESENTATIONS

In accordance with the requirements of the Town and Country Planning (Development Management Procedure) (England) Order 2015 (as amended), the application was publicised by way of:

- Neighbour notification letters sent to adjoining and nearby properties;
- A site notice displayed near the site;
- An advertisement placed in the local press.

These methods were used to inform interested parties and provide a period of 21 days for comments to be submitted. All material planning issues raised in representations have been taken into account and are addressed in the relevant topic-based sections of this report, with officer conclusions set out below.

The scale and range of representations received demonstrate that the application has been subject to extensive public scrutiny, and officers are satisfied that the statutory and procedural requirements for publicity and consultation have been met.

Letters of Objection

At the time of writing, a total of 1,841 representations have been received in relation to the application. This figure reflects the cumulative number of representations submitted across more than one round of consultation and therefore includes repeat submissions from individuals and organisations who commented on the original and amended proposals. Accordingly, while the overall volume of representations demonstrates a very high level of public interest and concern, the figure of 1,841 does not equate to 1,841 unique respondents, and the number of individual objectors is lower.

The majority of representations (approximately 1,300) were received following the Strategic Planning Committee deferral on 21 April. These largely take the form of petition-style submissions, repeated or near-identical representations, and individual comments. While many of the post-deferral submissions reiterate matters previously raised, they collectively reinforce the strength and consistency of objection to the proposal. All representations have been reviewed and the material planning issues they raise are summarised below.

Principle of Development / Suitability of Location

- Objection to the principle of a large-scale anaerobic digestion facility on a greenfield site in open countryside.
- Concerns that the proposal introduces industrial-scale development into a rural area characterised by agriculture, leisure and tourism.
- Repeated view that the proposal would represent inappropriate industrialisation/urbanisation of the countryside and would be incompatible with the character and function of the wider Cotswold Water Park area.
- Calls for the facility to be sited on brownfield land or within/adjacent to established industrial locations, or closer to strategic roads and/or grid injection infrastructure.

Proximity to Sensitive Receptors (Residential Areas / School / Playgroup)

- Strong concerns regarding proximity (commonly cited as around 500m) to Ann Edwards Primary School, South Cerney Playgroup and nearby residential areas, including Saxon Meadows and consented/approved housing at the former Cotswold Community site.
- Safeguarding concerns for children and concerns regarding the appropriateness of siting an industrial process close to schools and family housing.
- Objections that the submitted plans/mapping and/or supporting documentation do not fully reflect current built development and therefore understate proximity and effects on sensitive receptors.

Residential Amenity (General)

- Concerns that residents would experience unacceptable effects from odour, noise, light pollution, traffic movements and visual intrusion.
- Concerns that the development would reduce residential amenity and enjoyment of outdoor spaces, particularly in summer months.
- Some representations refer to stress/anxiety and perceived impacts on house values (noted as non-material—see below).

Air Quality, Odour and Human Health

- Concerns that anaerobic digestion and associated storage/handling of feedstocks and digestate would generate offensive odours and emissions, including methane, ammonia and hydrogen sulphide.
- Concerns that prevailing wind direction is likely to carry odour and pollutants towards nearby housing and schools.
- Objections that odour management proposals are insufficiently robust and that “sealed” process descriptions do not eliminate risk of releases during delivery, storage, maintenance or abnormal events.
- Concerns about cumulative air quality/odour impacts with existing nearby sources and with future planned growth (construction and occupation of housing).

- Some representations raise concerns regarding bioaerosols/micro-organisms and potential respiratory impacts for sensitive receptors.

Noise and Vibration

- Objections to 24/7 operations, including noise from plant, CHP engines, compressors, alarms, operational activity and vehicle movements.
- Criticism of the noise assessment approach and concern that night-time noise could exceed acceptable thresholds at sensitive receptors.
- Concerns that stop/start HGV movements and acceleration/braking at nearby junctions would add to noise impacts beyond what has been assessed.

Lighting / Tranquillity / Dark Skies

- Concerns about light spill and visual effects from security and operational lighting in a rural setting.
- Objections that lighting would erode local tranquillity and adversely affect residents, wildlife and the character of a countryside/tourism area. [Strategic...Plan 2026 | Word]

Highway Safety and Traffic Impact (Construction and Operational)

- Strong concerns about additional HGV, tanker and tractor movements, including peak movements and seasonal peaks linked to agricultural operations.
- Objections that Ashton Road and Spine Road (B4696) and surrounding rural routes are unsuitable for increased heavy traffic due to road width, alignment, visibility constraints and existing safety issues.
- Repeated reference to existing accident history and perception of junctions being accident “blackspots”, and the risk posed to pedestrians, cyclists and recreational users.
- Concerns about cumulative highway impacts in conjunction with quarry/industrial traffic, existing leisure traffic and current/consented housing growth.
- Cross-boundary concerns that impacts fall significantly within Gloucestershire routes as well as Wiltshire, and objections that cross-boundary highway matters must be fully assessed and consulted upon.

Water Environment: Flood Risk, Drainage and Pollution Pathways

- Concerns regarding surface water management and flood resilience, including that site layout and access are vulnerable during heavy rainfall events.
- Objections that run-off pathways and drainage ditches could convey pollutants (e.g., digestate, effluent or contaminated surface water) into nearby watercourses and interconnected lakes.
- Concerns that pollution incidents could have wider consequences for the Cotswold Water Park lakes and downstream receptors (including links to the upper reaches of the River Thames).
- Criticism that reliance on temporary/low-tech measures (e.g., sandbags) is not reflective of best available techniques for pollution prevention.
- Challenge to the assumption that the underlying geology provides an effective impermeable barrier, and asserting that potential pollutant pathways to the interconnected lakes may exist;

Ecology, Biodiversity and Designated Sites (SSSI and Wider Network)

- Objections emphasising proximity of the site to the Cotswold Water Park SSSI (often cited as within c. 300–500m) and concerns about indirect effects through air emissions, lighting, noise, hydrological connectivity and incident risk.
- Concerns about impacts on sensitive lake ecology (including rare aquatic flora such as stonewort's) and on protected species.
- Objections that ecological survey work is insufficiently detailed and that potential pathways of effect beyond the red line boundary have not been robustly assessed.
- Criticism that claimed biodiversity enhancements are insufficient to offset perceived wider harm to the designated landscape/wetland environment.
- Concerns that the proposal conflicts with the objectives of the Wiltshire and Swindon Local Nature Recovery Strategy, particularly in relation to water quality, air pollution, noise and light impacts on sensitive habitats.

Landscape and Visual Impact

- Objections to the height and industrial form of plant structures (digesters, tanks and associated infrastructure) and the perception that these would be visually intrusive within an open rural landscape.
- Concerns that landscape mitigation planting would take time to establish and would not prevent harm in the short to medium term.
- Repeated comments that the development would change local landscape character and degrade views from nearby communities and leisure receptors.
- Reference in representations to ongoing landscape concerns being unresolved despite amendments.
- Emphasis that the western Cotswold Water Park is highly water-dominated with a more recreational character with the perceived incompatibility of large-scale industrial development with this setting.

Tourism, Recreation and Local Economy

- Objections that the proposal would undermine the visitor economy of the Cotswold Water Park through traffic, odour, noise, lighting and visual intrusion.
- Concerns about effects on holiday parks, water sports, outdoor leisure businesses, cycling/walking routes and overall attractiveness of the area to visitors.
- Claims that any limited direct employment benefits would not outweigh potential harm to tourism-related employment and investment.
- Concerns regarding the interaction between development-related traffic and peak visitor activity, including organised sporting events and potential implications for emergency access within the Cotswold Water Park.

Sustainability, Carbon and “Green Credentials”

- Objections questioning the claimed carbon benefits once construction impacts, HGV movements, operational energy use, and flaring/CHP emissions are accounted for.
- Concerns about reliance on energy crops and the diversion of agricultural land away from food production.
- Objections that long-distance transport of feedstock and/or export of biomethane undermines claims of local sustainability and benefit.
- Some representations state that nearby settlements would receive limited direct benefit (e.g. where communities are not connected to mains gas).

- Concerns that the planning assessment fails to properly account for lifecycle greenhouse gas emissions, including transport-related emissions, and that carbon capture benefits are overstated or uncertain.

Operational Nuisance (Vermin / Insects / Biosecurity)

- Concerns raised regarding attraction of pests/vermin and insects associated with storage/handling of organic materials.
- Biosecurity concerns raised regarding movement and handling of animal and poultry wastes (including disease transmission risks).

Deliverability, Environmental Permitting and Regulatory Controls

- Repeated concern that the proposal may not be capable of operating lawfully if environmental permitting requirements cannot be met, particularly in view of proximity to sensitive receptors and designated sites.
- Objections that planning permission should not be granted where deliverability remains uncertain and where key regulatory matters remain unresolved.

Alternatives and Site Selection

- Continued objections that the applicant has not demonstrated that alternative, less constrained sites have been meaningfully explored.
- Calls for comparative assessment of sites further from sensitive receptors and closer to strategic infrastructure/routes.

Cumulative and Cross-Boundary Impact Assessment

- Objections that cumulative impacts (traffic, air quality, noise, amenity and landscape) alongside other development and operations have not been adequately assessed.
- Cross-boundary concerns that impacts fall significantly within Gloucestershire and require full consideration in transport assessment and consultation.

Control, Enforcement, Decommissioning and Long-Term Management

- Concerns about enforceability of operational assumptions (traffic routing, feedstock sourcing, odour control) over the lifetime of the development.
- Requests that any permission (if granted) should secure decommissioning and full restoration of the site, including suggestions for a restoration bond/financial security.

Consultation / Transparency / Weight of Representations

- Some objections question the provenance and similarity of certain support representations and contend that these should be afforded limited weight if they do not address site-specific impacts.
- Concerns are raised by some objectors about the quality/accuracy of information presented in consultation material and about local awareness/engagement.

Non-Material Considerations Raised

A number of representations raise matters that are not material planning considerations. These include perceived impacts on property values, loss of private views, personal financial circumstances, emotional distress, mistrust of the applicant or developer motives, and general opposition to renewable energy technologies. These matters have been noted but are not material to the determination of the planning application.

Overview of Key Issues Raised – Objections

The representations objecting to the proposal raise consistent concerns regarding the appropriateness of locating a large-scale anaerobic digestion facility within a rural and tourism-focused area. The principal issues relate to traffic generation and highway safety, proximity to residential areas and a primary school, potential impacts on amenity from noise, odour and visual intrusion, and risks to ecological and water environments given the site's sensitive location. Questions are also raised regarding the sustainability credentials of the proposal and potential harm to the local tourism economy.

A number of representations include detailed technical submissions and commentary on matters such as highways, drainage, groundwater, ecology and landscape impacts, including from individuals with relevant professional expertise. These have been carefully reviewed and taken into account in the preparation of this report.

In considering these representations, it is necessary to have regard to the role of statutory consultees, including the Local Highway Authority, National Highways, Environment Agency, Natural England, Lead Local Flood Authority, Thames Water and the Council's specialist officers. These bodies are the designated expert authorities for their respective disciplines and assess development proposals in accordance with established technical standards, policy requirements and regulatory frameworks.

Where no objection has been raised by such consultees, or where concerns have been addressed through conditions, officers are entitled to place significant weight on that advice in reaching a planning judgement. Consultees are provided with the application and supporting technical information and assess proposals within their respective areas of expertise; it is for those bodies to determine whether sufficient information has been submitted and to raise any concerns where necessary. While third-party technical submissions are a material consideration and have informed the assessment, they do not, in this case, demonstrate impacts that would justify a departure from the conclusions reached by the relevant statutory consultees.

Conversely, where objections have been raised by consultees, such as in relation to landscape and certain cross-boundary highways matters, these have been fully reflected in the assessment and given proportionate weight having regard to the nature and extent of the harm identified.

Letters of Support

A total of 62 comments were received including 40 signatories of a petition to support local farming. The following comments are noted:

Support for Local Farmers and Rural Economy

- The facility will use organic materials from local farms as feedstock, providing a new income stream for farmers.
- Digestate produced will replace expensive imported synthetic fertilisers, improving soil health and reducing costs.
- Opportunity for farmers to grow energy crops for the plant, aiding diversification.

Contribution to Renewable Energy and Net Zero

- The plant will produce biomethane, supporting the UK's transition to net zero and reducing reliance on fossil fuels.
- Enhances energy security by reducing dependence on foreign gas supplies.
- Captures and reuses CO₂, contributing to carbon reduction and supporting circular economy principles.

Environmental and Biodiversity Benefits

- Design includes measures to increase biodiversity and habitat provision.
- Digestate is nutrient-rich and regulated under PAS110 standards, improving soil quality and reducing chemical fertiliser use.
- AD process kills harmful bacteria and weeds, supporting sustainable farming practices.

Policy Alignment and National Need

- Supports Government targets for renewable energy, waste recycling, and biomethane production (Biomass Strategy 2023).
- Aligns with NPPF objectives for sustainable development and climate change mitigation.
- Recognised by trade bodies (REA and ADBA) as critical for energy security and decarbonisation.

Economic and Community Benefits

- Provides green employment opportunities in rural areas.
- Offers a local route for food waste treatment, reducing landfill and supporting circular economy goals.
- Seen as a positive step for farm diversification and resilience.

Design and Amenity

- Supporters state the buildings are comparable to agricultural barns and not visually intrusive.
- Belief that odour and noise can be effectively managed through best practice and regulatory controls.

Petition

- A petition containing 37 signatures has been submitted in support of the application, reinforcing the view that the proposal will benefit local farmers and contribute to renewable energy goals.

Overview of Key Issues Raised – Support

Supportive representations focus primarily on the role of anaerobic digestion in renewable energy generation, waste management and methane reduction. Supporters highlight benefits associated with the circular economy, nutrient recycling through digestate, and contribution to wider energy security and climate change objectives.

6. PLANNING CONSIDERATIONS

In accordance with Section 70 (2) of the Town and Country Planning Act 1990, Section 38(6) of the Planning and Compulsory Purchase Act 2004 states:

"If regard is to be had to the development plan for the purposes of any determination to be made under the planning Acts, the determination must be made in accordance with the plan unless material considerations indicate otherwise."

In accordance with this statutory requirement, this application has been assessed against the relevant policies of the Development Plan, including the Wiltshire Core Strategy (2015) and, where applicable, any relevant made, or emerging, Neighbourhood Plans. Consideration has also been given to the policies of the National Planning Policy Framework (NPPF) as a material consideration in the assessment.

Key issues

The main issues to be considered are:

- Environmental Impact Assessment (EIA) – whether the proposal constitutes EIA development and adequacy of the Environmental Statement
- Principle of development
- Landscape and visual impact
- Impact on designated sites and ecology
- Residential amenity
- Highways and transportation
- Drainage and flood risk
- Air quality and emissions
- Agricultural land quality
- Planning obligations and mitigation
- Overall planning balance

6.1 Environmental Impact Assessment (EIA) Screening and Adequacy

In accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended), the local planning authority has considered whether the proposed development constitutes EIA development.

A formal screening opinion was issued by the local planning authority prior to submission (reference: PL/2022/09477), confirming that the proposal does constitute EIA development under schedule 2 of the EIA Regulations. Although Schedule 2 development normally requires EIA only in limited circumstances, this proposal was considered to be EIA development due to its scale and nature and its close proximity (approximately 180m) to the Cotswold Water Park SSSI, where emissions (including ammonia, NO_x and SO₂) are likely to give rise to significant effects on a sensitive ecological receptor. In addition, the potential for significant effects on the historic environment (including a Scheduled Monument), air quality, and risks associated with biogas production and storage mean that the development is likely to result in significant environmental effects for the purposes of the EIA Regulations, necessitating an

Environmental Statement. In light of this, an Environmental Statement (ES) has been submitted with the application.

The local planning authority has reviewed the Environmental Statement and supporting documentation and, exercising independent planning judgement, is satisfied that it meets the requirements of Regulation 18 of the EIA Regulations and provides sufficient information to enable a reasoned conclusion to be reached on the likely significant environmental effects of the development.

The Environmental Statement assesses the likely significant environmental effects of the proposed anaerobic digestion facility, including impacts on air quality, ecology (including biodiversity and designated sites), flood risk and drainage, landscape and visual amenity, land quality, transport, and the historic environment. It also considers cumulative effects and identifies mitigation measures to avoid, reduce or mitigate any significant adverse impacts over the lifetime of the development.

The EIA Regulations require consideration of reasonable alternatives where they are relevant to the assessment of likely significant effects. They do not impose a general obligation to undertake a comparative site-selection exercise. In this case, the Environmental Statement explains the locational rationale for the proposal and assesses environmental effects arising from the chosen site. Officers are satisfied that the information provided is proportionate to the scale and nature of the development and meets the requirements of the EIA Regulations in this regard.

The Environmental Statement includes an assessment of cumulative effects, taking into account committed and reasonably foreseeable developments in the surrounding area. Officers are satisfied that, subject to the proposed mitigation, no significant adverse cumulative environmental effects would arise that would outweigh the benefits of the development.

The requirement for a Habitats Regulations Assessment is distinct from EIA. The proposal does not have a likely significant effect on European sites, either alone or in combination, and therefore does not trigger the need for an HRA. This conclusion is supported by Natural England's consultation response.

Consideration of the Finch judgment

Objections have referred to the Supreme Court's decision in *R (Finch) v Surrey County Council* [2024] UKSC 20, arguing that the Environmental Statement should assess "downstream" or end use emissions associated with the proposed development. Officers have had careful regard to this judgment.

The Finch case concerned the scope of environmental assessment for EIA development involving the extraction of fossil fuels, where greenhouse gas emissions arising from the inevitable combustion of those fuels were held capable of constituting an indirect effect of the development for the purposes of EIA.

The present proposal differs materially from the circumstances in Finch. It does not involve fossil fuel extraction, but rather a renewable energy facility producing biomethane from

agricultural feedstocks, intended to displace fossil gas within the energy system. The Environmental Statement includes an assessment of lifecycle greenhouse gas emissions and demonstrates that the proposal would deliver a net carbon benefit.

As required by the EIA Regulations, the Environmental Statement assesses the likely significant environmental effects of the development itself, including emissions, traffic movements and operational impacts, all of which are considered as direct effects through the EIA and the planning assessment. Matters relating to detailed process control, emissions limits and environmental protection during operation are subject to regulation under the Environmental Permitting regime, which operates alongside, but separately from, the planning system.

Officers are satisfied that, in this context, the scope of the Environmental Statement is appropriate and does not conflict with the principles established in the Finch judgment. Additional clarification provided by the applicant confirms that lifecycle carbon emissions, including those associated with the end use of biomethane, have been taken into account within the submitted carbon calculations. Officers are therefore satisfied that the Environmental Statement provides a sufficient and proportionate assessment of greenhouse gas effects for the purposes of the EIA Regulations.

Conclusion

Officers are satisfied that the Environmental Statement has identified, described and assessed the likely significant environmental effects of the development in accordance with the EIA Regulations. Taken together with consultation responses and the mitigation proposed and secured, it provides sufficient information to enable the local planning authority to reach a reasoned conclusion on the environmental effects of the proposal.

6.2 Principle of development

Policy Context

Core Policy 42 of the Wiltshire Core Strategy supports standalone renewable energy development where site-specific impacts, such as landscape, biodiversity, heritage, transport, amenity and agricultural land, are appropriately addressed. The policy does not impose a locational restriction to settlement boundaries but requires a balanced assessment of impacts having regard to the characteristics of the site and its surroundings. These matters are considered in detail within the topic-based sections of this report. While large in scale, the development is assessed under CP42 rather than general countryside restraint policies.

Where anaerobic digestion (AD) proposals utilise feedstocks that fall within the planning definition of “waste”, Policies WDC1 and WDC2 of the Waste Development Control Policies DPD also apply. These require waste-related development to contribute positively to sustainable development and ensure that environmental, social and economic impacts are avoided or suitably mitigated.

At national level, the National Planning Policy Framework (NPPF) attaches significant weight to renewable and low-carbon energy infrastructure, recognising its essential role in meeting

the UK's net-zero commitments and enhancing long-term energy security. The Framework makes clear that such schemes should be approved where impacts are, or can be made, acceptable.

Taken together, the development plan and national policy establish a strong in-principle presumption in favour of renewable energy development, subject to the satisfactory resolution of site-specific impacts.

Assessment

The proposal is for an anaerobic digestion facility producing biomethane for injection into the national gas grid, together with digestate and captured CO₂. As a form of renewable energy infrastructure, the development aligns in principle with the objectives of Core Policy 42 and with national policy support for low-carbon energy generation, subject to detailed assessment of its impacts.

A key requirement for anaerobic digestion facilities is their proximity to a reliable and locally available source of agricultural feedstock, in order to minimise transport distances, reduce associated emissions and ensure operational viability.

In this regard, the applicant has provided further evidence within the submitted technical note demonstrating the extent and distribution of agricultural land within a defined 15km radius of the site (see Figure 5 below). This confirms that the site is centrally located within a substantial and well-established agricultural catchment, with a significant area of available farmland capable of supplying the required feedstock.

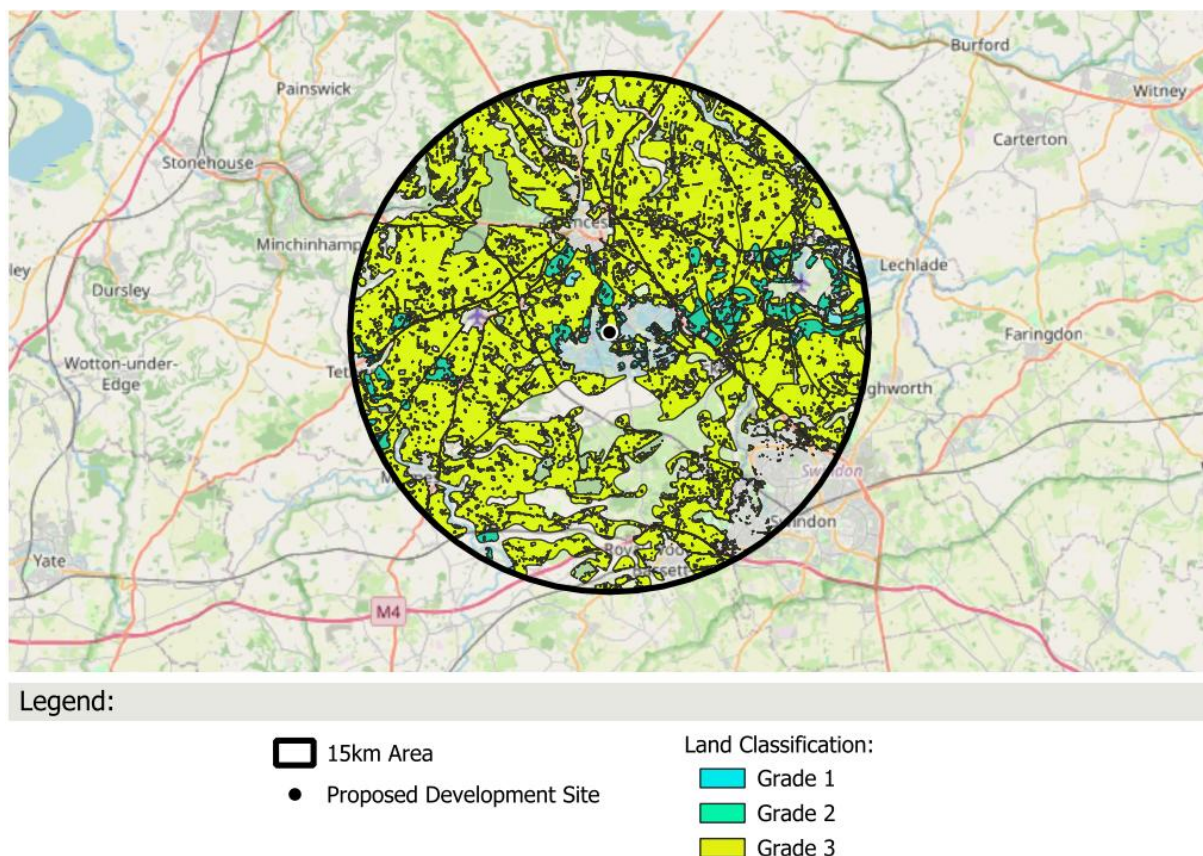


Figure 5 – Feedstock Availability within 15km of the Site

The diagram above illustrates that the required feedstock represents only a small proportion of the overall agricultural resource available within the catchment, indicating a robust and readily accessible supply base. This evidence reinforces the locational rationale for the development and demonstrates that the proposals would be appropriately sited in relation to the surrounding agricultural economy.

It also responds to concerns raised by objectors regarding the alleged absence of nearby farms or reliance on distant feedstock sources, confirming that the development would draw predominantly from the surrounding rural area rather than requiring long-distance transport.

This supports the conclusion that the site represents a suitable and sustainable location for an anaerobic digestion facility, consistent with Core Policy 42 and the objectives of the NPPF in supporting renewable and low-carbon energy development in appropriate locations.

The site lies within the wider Cotswold Water Park landscape, characterised by a mix of agricultural land, restored and active mineral workings, lakes, ecological assets and dispersed rural commercial uses. It is not located within a National Landscape, Green Belt or other nationally designated landscape. Although the Cotswold National Landscape lies approximately 5 km to the north-west, the site is visually and physically separated from it. The acceptability of the proposal in this location therefore turns on its site-specific impacts rather than any policy-based exclusion in principle.

In this context, it is acknowledged that the proposed development represents a large-scale anaerobic digestion facility situated within a rural environment, with a number of nearby receptors including residential properties and environmental assets. However, this arrangement is not unusual for such forms of development.

National guidance and industry practice indicate that anaerobic digestion facilities are commonly located in rural areas, reflecting their functional relationship with agricultural feedstock sources and the need to minimise transport distances.

Evidence also indicates that the majority of biomethane-producing facilities in Great Britain are located within rural areas, demonstrating that such development is not inherently incompatible with countryside locations or proximity to settlements and other receptors.

Consequently, the presence of nearby receptors, in itself, does not preclude development of this nature. Rather, the relevant consideration is whether the potential impacts arising from the proposal, including traffic, noise, odour, landscape and ecological effects, can be acceptably mitigated.

In this regard, the proposal is subject to both the planning and environmental permitting regimes, which together provide a comprehensive framework for the detailed assessment, control and ongoing regulation of operational effects. These regimes include the imposition of enforceable mitigation measures and monitoring requirements, ensuring that any impacts on amenity and the environment are appropriately managed.

The determination of the application must therefore turn on the acceptability of the specific impacts identified in this case, rather than the principle of proximity to receptors alone.

There are no designated heritage assets within or adjacent to the site. Intervening distance, landform and vegetation limit intervisibility with more distant assets, and the Environmental Statement assesses potential effects on heritage assets, with detailed consideration of significance and setting addressed later in this report.

From an ecological perspective, the site comprises arable land of relatively low intrinsic ecological value. While the Cotswold Water Park SSSI lies approximately 300 m away, the submitted assessments examine potential hydrological pathways and identify mitigation measures intended to avoid significant effects, as assessed in detail in the Ecology section of this report.

The site benefits from direct access to Ashton Road, connecting to the B4696 Spine Road and the A419 dual carriageway, and, through the OTMP secured by condition, HGV routing will be restricted to the A419 and B4696 Spine Road, preventing routing through villages. Transport impacts and highway safety are considered separately, and do not indicate that the location is unacceptable in principle.

The nearest residential properties are approximately 335 m from the operational areas. Potential impacts relating to odour, noise and lighting have been assessed through the Environmental Statement and are addressed under the Amenity section of this report.

In terms of agricultural land, the site comprises a mix of Subgrade 3b and smaller areas of higher quality land (Grades 2 and 3a). While best and most versatile land is afforded protection, Grade 3 land is widespread within the locality. The acceptability of the proposal in principle is not undermined by the loss of agricultural land, which is considered in detail elsewhere in the report.

Minerals Safeguarding and Waste Policy Considerations

In addition to renewable energy policy considerations, the site's location within a Minerals Safeguarding Area requires specific assessment.

The application site lies within a Minerals Safeguarding Area for sand and gravel. Mineral safeguarding policy seeks to prevent the unnecessary permanent sterilisation of viable mineral resources by non-mineral development, unless it can be demonstrated that prior extraction is not practicable or that the development would not prejudice future working.

In this case, the submitted information indicates that comprehensive prior extraction of sand and gravel is not realistically practicable, having regard to groundwater sensitivity, proximity to designated ecological assets, and the site's role within the functioning Cotswold Water Park landscape. These constraints are addressed in detail elsewhere in this report.

Since the preparation of the draft report, a Mineral Resource Assessment has been submitted in support of the application. The assessment, prepared by Savills in accordance with national

mineral safeguarding practice guidance, draws on site-specific borehole and trial pit data from the submitted Ground Investigation Report. It concludes that the site is not underlain by a discrete or workable sand and gravel deposit of the type typically extracted within the Cotswold Water Park. Instead, the superficial deposits are thin and dominated by clay-rich material, with sand occurring only as a minor constituent and no gravel identified across the site. The underlying geology comprises predominantly Kellaways Clay. On this basis, the assessment confirms that the quality and quantity of material present would not support economically viable mineral extraction and that the underlying resource is unlikely to be worked.

However, and importantly in this context, the proposed anaerobic digestion facility is inherently temporary in nature, with an operational lifespan of approximately 25 years. The development would not result in the permanent loss of access to the underlying mineral resource. Following decommissioning, the site could be restored, and minerals could be extracted at that stage, or mineral recovery could form part of any future redevelopment proposals, subject to the necessary consents.

In addition, the development will require site levelling and earthworks to facilitate construction. As part of this process, a proportion of sand and gravel would be excavated and utilised or removed, representing a limited and incidental contribution towards mineral recovery, albeit not equivalent to comprehensive prior extraction.

Having regard to the temporary and reversible nature of the development, the absence of permanent built sterilisation, and the scope for mineral recovery both during construction and in the longer term following decommissioning, the proposal is not considered to result in the unjustified sterilisation of safeguarded mineral resources and is therefore acceptable in principle and does not conflict with minerals safeguarding policy.

This approach is consistent with the objectives of minerals safeguarding policy, which seeks to avoid unnecessary sterilisation of viable resources rather than to require extraction where it is impracticable or environmentally constrained.

In addition, the submitted Ground Investigation Report provides useful context regarding the nature of the underlying deposits. While the site lies within a Minerals Safeguarding Area for sand and gravel, the intrusive investigations encountered predominantly clay-rich material across the site, comprising sandy silty clay within the superficial deposits and extensive Kellaways Clay at depth. Although sand is present as a constituent within the Alluvium, it is generally bound within a clay matrix rather than occurring as a discrete, free-draining sand and gravel resource.

On the basis of the submitted Mineral Resource Assessment and ground investigation evidence, officers are satisfied that the site does not contain a viable or economically workable sand and gravel resource. The proposal therefore falls within the exceptions set out in Policy MDC4 of the Wiltshire and Swindon Minerals Development Control Policies and would not result in the unjustified sterilisation of safeguarded mineral resources.

With regard to waste policy, while the proposal is primarily advanced and assessed as renewable energy infrastructure in accordance with Core Policy 42 of the Wiltshire Core Strategy, recent case law confirms that certain agricultural manures may fall within the

planning definition of “waste” in some circumstances. In light of this, the proposal has also been assessed against Policies WDC1 and WDC2 of the Waste Development Control Policies DPD.

Having regard to both policy frameworks, officers are satisfied that the proposal performs acceptably whether considered as a standalone renewable energy development or as a form of waste-related development. In particular, the scheme incorporates enclosed processing, pollution prevention measures, controlled drainage, appropriate access arrangements and suitable separation distances to sensitive receptors, ensuring that potential waste-related impacts can be avoided or adequately mitigated.

Waste-related impacts are capable of being appropriately managed through the design of the development, planning conditions, and the separate environmental permitting regime. On this basis, the proposal is considered acceptable in principle under both Core Policy 42 of the Wiltshire Core Strategy and Policies WDC1 and WDC2 of the Waste Development Control Policies DPD.

National Energy Policy, Climate Change and Locational Considerations

In addition to the development plan, significant weight is afforded to national energy and climate change policy, which are material considerations in the determination of this application.

The Overarching National Policy Statement for Energy (EN-1) sets out the Government’s strategic need for new energy infrastructure in order to deliver a secure, resilient and decarbonised energy system, and recognises that low-carbon energy projects should be supported where impacts can be acceptably managed. Although EN-1 is principally directed at nationally significant infrastructure, it is well-established that its statements of need and policy direction are material to decision-making under the Town and Country Planning Act.

The proposal also directly supports the statutory objectives of the Climate Change Act 2008 (as amended), which commits the UK to achieving net-zero greenhouse gas emissions by 2050, and places an obligation on public bodies to have regard to climate change mitigation when exercising relevant functions. National planning guidance further reinforces this position: the Planning Practice Guidance on Renewable and Low Carbon Energy confirms that planning has an important role in facilitating renewable energy infrastructure in locations where environmental impacts are acceptable, and that the need for such development does not automatically override local considerations but must be assessed on a site-specific basis.

In addition, the Government’s Green Gas Support Scheme (GGSS) demonstrates ongoing national policy support for the deployment of biomethane produced via anaerobic digestion and injected into the gas grid, reflecting the recognised role of this technology in decarbonising heat, improving energy security and supporting the circular economy.

With regard to siting, Environment Agency guidance on anaerobic digestion facilities makes clear that such infrastructure is commonly and appropriately located in rural areas close to feedstock sources, subject to suitable separation from sensitive receptors and the implementation of pollution prevention and environmental controls. Taken together, these

national policies and guidance establish clear support in principle for anaerobic digestion facilities, including in countryside locations, subject to the satisfactory resolution of site-specific impacts, which are addressed in the detailed sections of this report.

Energy Security and National Resilience

Recent global events have reinforced the importance of domestic energy security and resilience as a core objective of national policy. Ongoing geopolitical instability, including the conflict in Ukraine and heightened tensions affecting international energy markets, has exposed the UK's historic reliance on imported fossil fuels and the vulnerability of global supply chains. In response, Government policy has consistently emphasised the need to accelerate the deployment of home-grown, low-carbon energy sources in order to reduce exposure to external shocks, improve resilience, and maintain secure and affordable energy supplies.

This position is reflected in the Overarching National Policy Statement for Energy (EN-1), which places substantial weight on infrastructure that contributes to security of supply alongside decarbonisation, and in wider national initiatives such as Clean Power 2030 and continued support for renewable gas through the Green Gas Support Scheme.

Anaerobic digestion and biomethane production are specifically recognised within this policy framework as technologies capable of delivering dispatchable, domestically produced energy that directly substitutes for fossil natural gas. In this context, the contribution of proposals such as the development under consideration to national energy resilience is a material consideration in assessing the principle of development, subject to the satisfactory management of site-specific impacts addressed elsewhere in this report.

Conclusion

The proposal has been assessed in principle against the development plan as a whole, including Core Policy 42 of the Wiltshire Core Strategy and, insofar as relevant, the Wiltshire and Swindon Waste Core Strategy, in particular Policy WCS3 and Policies WDC1 and WDC2 of the Wiltshire Waste Development Control Policies DPD. Officers are satisfied that the development is acceptable in principle under both policy frameworks. Paragraph 11(d) of the NPPF is therefore not engaged.

In strategic policy terms, the proposal represents a form of renewable and low-carbon energy development that is supported in principle by national policy and by Core Policy 42, with significant weight attached to its contribution to decarbonisation, energy security and the transition to a low-carbon economy.

The site lies outside nationally designated landscapes, avoids heritage constraints, and benefits from suitable access to the strategic road network. The proposal would not unreasonably prejudice mineral safeguarding objectives and is consistent in principle with the sustainable waste management aims of the Waste Development Control Policies DPD.

Accordingly, and subject to the detailed assessment of site-specific impacts set out in the topic-based sections of this report, the principle of the development is considered acceptable.

6.3 Design and impact on the character and appearance of the area

Policy Context

Chapter 12 of the NPPF requires development to achieve high-quality design that is visually attractive, well-functioning and sympathetic to local character. Paragraph 135 emphasises that planning decisions should ensure proposals contribute positively to local distinctiveness and reinforce a strong sense of place. The National Design Guide further promotes context-sensitive design, use of appropriate materials, and landscape-led approaches.

Core Policy 57 of the Wiltshire Core Strategy requires all development to be of a high design standard, responding positively to the existing character of Wiltshire, integrating effectively with the site and its surroundings, and minimising visual intrusion. For non-residential schemes, this includes appropriate massing, material choice, landscaping and functional layout.

The Ashton Keynes Neighbourhood Plan (Policy HCP1) seeks development that reflects and respects the local character of the parish, including building proportions, materials and landscape setting. It places particular emphasis on safeguarding rural character and ensuring new development integrates sensitively with the wider landscape.

Policies WDC1 and WDC2 of the Waste Development Control Policies DPD additionally require waste-related development to be appropriately sited and designed to minimise visual and landscape impacts.

These policies collectively establish a requirement for high-quality, contextually sensitive design that minimises harm to local character and integrates effectively with the landscape.

Assessment

The design of the scheme has undergone several stages of refinement, informed by consultee feedback and an iterative landscape-led approach. As a result, the proposal now demonstrates a clear intention to reduce scale and massing, improve integration with the rural setting, and adopt materials and layouts that minimise visual prominence.

The layout concentrates the tallest structures, namely the digester tanks, towards the northern part of the site, away from the closest public viewpoints. Ancillary buildings are grouped logically to create a compact operational core, reducing the perceived spread of development. This approach reflects Core Policy 57's requirement for functional and efficient site organisation while managing visual impact.

The design evolution has included significant reductions in height and scale:

- Digesters reduced from five to three, with two flat-topped tanks at 9m and one domed tank reduced to 16.5m.
- Lowered finished ground levels to reduce apparent massing.
- Reduction of the Chicken Manure Processing Building by 3.5m to decrease structure dominance.

These amendments demonstrate clear engagement with policy objectives and constructive responses to design concerns.

The chosen muted, natural tones (e.g., juniper green) and subdued cladding reduce visual contrast with the surrounding agricultural landscape. Roof materials and external finishes have been selected to soften views and avoid industrial overtone. This complies with Core Policy 57 and the Neighbourhood Plan's emphasis on appropriate materials that harmonise with their setting.

The scheme incorporates extensive landscape mitigation, including:

- earth bunding formed from site-won soils
- native tree and hedgerow planting
- species-rich meadows and biodiversity areas
- willow screening at the site entrance
- reinforcement of existing hedgerows

Approximately 40% of the site is now allocated for planting and habitat creation, an increase from 35% in earlier iterations. The landscape-led strategy is consistent with the Wiltshire Design Guide, Core Policy 57 and the Neighbourhood Plan's requirement for sensitive integration within the rural environment.

Over time, this structural planting will soften the appearance of the built elements, reduce visibility from Ashton Road and nearby PRow, and help integrate the facility within the wider Cotswold Water Park character.

External lighting is designed to minimise light spill through downward-directed fittings, warm colour luminaires and the use of presence detection where feasible. The lighting strategy has been informed by rural lighting guidance (including ILP Environmental Zone E2 standards) and is intended to protect rural character, residential amenity and ecological receptors.

The facility's layout reflects operational efficiency, safe circulation and environmental safeguards, while still adopting measures to reduce visual intrusion. The balance between functional necessity and design sensitivity is in line with both the NPPF and CP57, which require developments to be well-designed without compromising their operational purpose.

While the proposal introduces notable and clearly visible structures into a rural setting, officers acknowledge that some adverse effects on local character and landscape remain. However, having regard to the infrastructure nature of the development, the reduced scale and massing, the muted material palette and the extensive landscape mitigation proposed, the design response is considered to represent the best practicable outcome and to limit visual harm to an acceptable level.

Officers note that the Council's Landscape Officer maintains concerns regarding residual landscape harm; however, for the reasons set out above and in the Landscape section of this report, officers consider that the design evolution and mitigation proposed are sufficient to address policy requirements in design terms, notwithstanding that some residual landscape effects are identified and considered further in the Landscape section of this report.

Conclusion

The proposal introduces sizeable infrastructure into a rural landscape; however, the iterative design process, reduced massing, sensitive colour palette and comprehensive landscape strategy collectively demonstrate a clear commitment to achieving high-quality, contextually appropriate design. The facility has been shaped to respect local character as far as practicable, integrating screening, planting and careful site layout to minimise visual intrusion.

On balance and acknowledging that some residual visual and character impacts remain, the scheme is considered to achieve an acceptable standard of design for development of this nature in accordance with Core Policy 57, the Wiltshire Design Guide, the NPPF's design principles, the Ashton Keynes Neighbourhood Plan, and Policies WDC1 and WDC2. Subject to conditions securing final materials, landscaping and lighting details, the development is acceptable in design terms.

6.4 Impact on Heritage Assets

Policy Context

The statutory duties under the Planning (Listed Buildings and Conservation Areas) Act 1990 are central to decision-making.

- Section 66 requires the Council to give *special regard* to the desirability of preserving listed buildings, their settings, and any features of special architectural or historic interest.
- Section 72(1) requires *special attention* to be paid to preserving or enhancing the character or appearance of Conservation Areas.

Chapter 16 of the NPPF (December 2024) sets out national policy for conserving and enhancing the historic environment. Key provisions require:

- *Great weight* to be given to conserving designated heritage assets (para. 212);
- *Clear and convincing justification* for any harm (para. 213);
- balancing any harm against public benefits (paras. 215–216);
- ensuring development sustains significance and contributes positively to local character (paras. 208 & 210).

Wiltshire Core Strategy Policies CP57 and CP58 require high-quality design that responds positively to the historic environment, conserving or where appropriate enhancing heritage assets and their settings.

Policy WDC9 of the Waste Development Control Policies DPD requires waste-related development to protect archaeological remains, heritage assets and their settings and to secure appropriate investigation and mitigation.

The Ashton Keynes Neighbourhood Plan (Policy HCP1) expects development to respond positively to local character, including scale, materials and the setting of heritage assets.

Assessment

Designated Heritage Assets

The application site lies within an archaeologically rich landscape but is well separated from designated heritage assets. The submitted Heritage Statement, together with site analysis and consultee input, provides an adequate understanding of the significance of nearby listed buildings and their settings, thereby meeting NPPF requirements for proportionate assessment.

The Council's Senior Conservation Officer raises no objection, confirming that the proposals meet the requirements of conservation legislation and national and local heritage policy. They note that some limited intervisibility exists between the upper storeys of the Grade II listed Ashtonfields Community Hall cluster and the tops of the silage clamps (Approx. 560m separation distance); however, they conclude this would amount only to a minor adverse change that would not harm the elements of setting that contribute to significance, and therefore results in no harm (either substantial or less than substantial) to the heritage asset.

Ashton Keynes Conservation Area lies approximately 1 km to the south. Given intervening vegetation, distance and landform, there is no intervisibility or functional relationship such that the character or appearance of the Conservation Area would be affected. No harm arises.

Scheduled Monuments lie between 350 m and 1.7 km from the site. Their settings are not materially affected, as confirmed by the Conservation Officer and supported by the applicant's assessment. Existing vegetation, distance and the low-lying nature of the site ensure that their significance is preserved.

As no harm to the significance of designated heritage assets has been identified, the balancing exercise set out in paragraphs 215–216 of the NPPF is not engaged.

Archaeology

The County Archaeologist has reviewed the outcomes of the trial trench evaluation and has withdrawn the previous objection, confirming that the archaeological potential has now been satisfactorily characterised. He advises that a targeted strip, map and record excavation is required over the area of archaeological interest identified in Trench 19 (minimum 30 × 30 m plus contingency). This can be secured by condition requiring the submission, approval and full implementation of a written programme of archaeological investigation prior to commencement. This is consistent with ClfA standards and ensures appropriate investigation, recording and archiving.

Design Response in Relation to Heritage

Several design refinements have been incorporated to reduce any perceptible effects on heritage settings:

- lowering the Chicken Manure Processing Building by 3.5 m
- expanding structural planting and bunding

- introducing a native willow screen at the site entrance
- refined colour palette and materials
- increased green infrastructure and native meadow planting

These changes reduce visibility of the built elements and further protect the wider heritage landscape. The Conservation Officer confirms that these revisions do not alter her previous assessment and remain acceptable.

The scheme therefore sustains the significance of designated heritage assets, aligning with CP57 and CP58, and meets the expectations of the NPPF in ensuring development is sympathetic to the historic environment.

Conclusion

The proposal has been robustly assessed against statutory duties, national policy (NPPF Chapter 16), and local heritage policies CP57, CP58 and WDC9. Designated heritage assets, including listed buildings, Scheduled Monuments and the Ashton Keynes Conservation Area, are sufficiently distant and visually contained to avoid harm to their significance or settings.

The Council's Senior Conservation Officer raises no objection, confirming that the proposals conserve significance and comply with conservation legislation and policy. The County Archaeologist has withdrawn previous objections, subject to a standard condition requiring a targeted archaeological strip, map and record exercise.

Subject to the imposition of an archaeological condition, the development is considered acceptable in heritage terms and compliant with the statutory duties and policy requirements, the NPPF, Wiltshire Core Strategy Policies CP58 and CP57, Policy WDC9 and the Ashton Keynes Neighbourhood Plan.

6.5 Landscape and Visual Impact

Policy Context

National Policy

The NPPF requires landscapes and scenic beauty to be protected and enhanced, with particular weight given where proposals would affect nationally designated landscapes and other assets of particular importance. In this case the site is not within a nationally designated landscape, and the application is therefore assessed on its site-specific landscape and visual effects within the overall planning balance.

Local Policy

- Core Policy 51 (WCS) requires development to protect, conserve, and, where possible, enhance the character and quality of Wiltshire's landscapes. Particular weight is given to proposals that may affect National Landscapes, locally valued landscapes, and sensitive settlement edges.

- Core Policy 57 (WCS) and the Wiltshire Design Guide SPD (2024) provide guidance on integrating development into the landscape through appropriate design, layout, and mitigation.
- The Green & Blue Infrastructure Strategy (2022–2030) supports the protection and enhancement of landscape character and connectivity.
- Policy WDC7 of the Waste Development Control Policies DPD requires waste management development to protect and, where possible, enhance landscape character and the wider countryside, informed by the Wiltshire Landscape Character Assessment. Particular care is required where development affects sensitive landscapes or the setting of settlements.
- Ashton Keynes NP Policy – Landscape Character & Tranquillity: Development should protect, conserve and enhance landscape character, maintaining the tranquillity and sense of place of the Parish. Proposals must be sensitive to the local settlement pattern and the environmental qualities of the Cotswold Water Park.
- In addition, WCS Core Policy 42 supports standalone renewable energy schemes (including anaerobic digestion) “subject to satisfactory resolution of all site specific constraints”, including impacts on “the landscape”, and expressly cross-refers decision makers to Core Policy 51 (Landscape). National guidance similarly confirms that planning “has an important role in the delivery of new renewable and low carbon energy infrastructure in locations where the local environmental impact is acceptable.” This provides the policy basis for accepting some localised landscape harm where it is proportionate and outweighed in the planning balance, provided mitigation and controls are secured.

Assessment

Officers acknowledge at the outset that the proposal would give rise to adverse localised landscape and visual effects, particularly in relation to engineered landform change and impacts on close-range receptors. These effects engage Core Policy 51 of the Wiltshire Core Strategy and relevant Neighbourhood Plan policies. The assessment below therefore does not seek to establish whether landscape harm would occur, but rather considers the scale, extent, duration and weight to be attributed to that harm in the planning balance, having regard to the non-designated status of the landscape, the revised design and mitigation measures, the mixed and working character of the Cotswold Water Park, and the proposed restoration of the landform following decommissioning.

The application is supported by a Landscape and Visual Impact Assessment (LVIA) prepared in accordance with Guidelines for Landscape and Visual Impact Assessment, Third Edition (GLVIA3), with reference to the Landscape Institute’s Visualisation Guidance (2019) and subsequent clarifications (2024), Natural England guidance on landscape character and sensitivity, and relevant local landscape character assessments. A study area of 2 kilometres has been adopted. The methodology combines professional judgement with an assessment of receptor sensitivity and magnitude of change to determine significance. An updated Appendix 7.1 accompanies the Environmental Statement Addendum and sets out the assessment matrices and criteria applied.

The applicant describes the baseline as a circa 7-hectare area of arable land located on the eastern slope of Ashton Down within the Cotswold Water Park, with multiple Sites of Special

Scientific Interest (SSSI) units located approximately 0.6–0.7 kilometres from the site. The site is not subject to any national or local landscape designation, and the Cotswolds National Landscape lies at a considerable distance. The surrounding landscape is characterised in the LVIA as dynamic and evolving, influenced by wetland restoration, recreation, nature recovery initiatives, hedgerows, public rights of way, and the presence of nearby minerals and industrial uses.

Since submission of the application in 2023, the applicant has undertaken a series of design changes and refinements. These include a reduction in the number of digesters from five to three; the use of two flat-topped digesters at approximately 9 metres in height and one domed digester at approximately 16.5 metres; reduced bulk and massing through lowered finished site levels; a reduction in the height of the Chicken Manure Processing Building; and a substantial expansion of boundary woodland and hedgerow planting. Approximately 40% of the site is now proposed as landscape planting or habitat creation, including woodland belts, meadow areas and willow screening near the site access (see figure 6 below). External lighting is proposed to accord with Institution of Lighting Professionals Environmental Zone E2 thresholds.



Figure 6 – Landscape Planting Strategy

The LVIA acknowledges that the introduction of large-scale plant and infrastructure would result in noticeable near-field change but concludes that landscape and visual effects would be largely localised. It identifies adverse effects for close-range receptors, including users of Ashton Road and adjacent public rights of way, during the early years of operation, reducing as planting matures. By Year 15, residual effects are assessed by the applicant as minor to moderate adverse. Effects at the wider landscape scale, including on the Cotswolds National Landscape, are assessed as negligible due to distance and intervening screening.



View Northwest from Ashton Road – Existing



View Northwest from Ashton Road – Photomontage Year 1 Mitigation (without updated willow planting)



View Northwest from Ashton Road – Photomontage Year 15 Mitigation (without updated willow planting)



View Southwest from Ashton Road – Existing



View Southwest from Ashton Road – Photomontage Year 1 Mitigation



View Southwest from Ashton Road – Photomontage Year 15 Mitigation



View Northeast from Public Footpath AKEY4 – Existing



View Northeast from Public Footpath AKEY4 – Photomontage Year 1 Mitigation



View Northeast from Public Footpath AKEY4 – Photomontage Year 15 Mitigation



View Southeast from Public Footpath AKEY4 – Existing



View Southeast from Public Footpath AKEY4 – Photomontage Year 1 Mitigation



View Southeast from Public Footpath AKEY4 – Photomontage Year 15 Mitigation

Review by the Council's Senior Landscape Officer

The Council's Senior Landscape Officer has provided a detailed independent review of the submitted LVIA. He broadly concurs with the applicant's conclusion that the greatest effects would be localised. However, he advises that the LVIA's judgements in relation to landscape value, receptor susceptibility and sensitivity, magnitude of change and significance are not sufficiently robust to inform planning judgement, resulting in an understatement of key adverse effects.

The principal areas of disagreement are summarised below.

First, in relation to landscape value, the Landscape Officer considers that the LVIA does not adequately recognise the local value of the Ashton Down hill feature, including the importance of elevated panoramic views across the Water Park from Public Right of Way AKEY4. He also considers that landscape value should not be assessed in isolation through an arbitrary 250-metre radius, noting that the site lies within the Cotswold Water Park boundary, which is subject to Core Policy 54 and associated character and vision documents that increase local value and sensitivity.

Secondly, regarding susceptibility and sensitivity, the Landscape Officer does not agree with the LVIA's comparison of the proposed anaerobic digestion facility to large agricultural buildings. In his view, a 7-hectare greenfield development comprising multiple large tanks, lagoons, clamp walls and containment structures on a sloping hillside represents an industrial form of development that is not characteristic of the landscape. Given the proximity of Ashton Road and PRoW AKEY4, he concludes that susceptibility should be assessed as high rather than medium.

Thirdly, the review places particular emphasis on the scale and invasiveness of the earthworks required to create large level development platforms on land that falls by approximately 10 metres across the site. It is noted that in places finished slab levels would be elevated above adjacent road levels. The Landscape Officer considers that topography sensitivity should be assessed as high and that, applying the LVIA's own methodology, the effects on landform during construction and operation would be major adverse and significant rather than "not significant".

Fourthly, in respect of mitigation, the Landscape Officer considers that the proposed bunds and woodland belts would be uncharacteristic of the existing open rolling landform and hedgerow pattern of Ashton Down. He advises that woodland planting on bunds would result in a permanent loss of currently open longer-distance views from sections of PRoW AKEY4, reducing perceptual qualities and appreciation of the landscape.

Fifthly, the Landscape Officer does not accept the LVIA's conclusion that visual effects from PRoW AKEY4 would become moderate neutral by Year 15. In his view, effects would remain major adverse and significant because elevated baseline views would be obstructed by retained planting and bunds, making the loss of openness permanent. He also identifies that the LVIA does not assess visual effects at the decommissioning stage and provides no clear explanation for the inconsistency between the landscape and visual assessment timeframes. Finally, the Landscape Officer raises concern regarding the certainty and feasibility of landform restoration following the proposed 25-year operational period. He advises that the application does not clearly demonstrate how soils would be stripped, stored and reused to reinstate

baseline landform levels. He recommends that, if permission is granted, the Local Planning Authority should secure restoration certainty through robust planning conditions and/or a Section 106 obligation requiring reinstatement to pre-development topographical levels.

Overall, the Landscape Officer concludes that, notwithstanding iterative design changes and mitigation, the proposal would result in unacceptable significant adverse localised landscape and visual effects, contrary to Core Policy 51, and that this harm should be afforded substantial weight in the planning balance.

Applicant's Landscape Rebuttal

The applicant has submitted a detailed landscape rebuttal (June 2026) in response to the Council's Senior Landscape Officer's comments, which has been taken into account in the assessment.

In summary, the applicant disputes the extent of harm identified and maintains that the proposal has been appropriately assessed through the submitted LVIA. In particular:

- The applicant contends that the site and its surroundings do not constitute a 'valued landscape' for the purposes of the NPPF, noting the absence of statutory or non-statutory landscape designation and referring to relevant guidance on landscape value.
- The applicant provides further quantification of landform change, stating that approximately 7.38% of the wider hill feature would be directly affected by earthworks, and emphasises the temporary nature of the development.
- It is highlighted that the development is reversible, with restoration proposals supported by the retention of the majority of soils and cut-and-fill material on site, as set out in the submitted Decommissioning Framework.
- In respect of visual effects, the applicant refers to LVIA modelling and photomontages, which they consider demonstrate that visual effects, including from PRoW AKEY4, would reduce over time as mitigation planting establishes.
- The applicant further confirms that the LVIA methodology, including study area and viewpoint selection, is compliant with GLVIA3.

The applicant concludes that, having regard to these factors, the proposal would not give rise to unacceptable landscape or visual effects and would accord with relevant development plan policies and the NPPF.

Officer Assessment

Following publication of the initial committee report, the applicant submitted a Decommissioning Framework providing additional detail on restoration feasibility. This confirms that approximately 96% of stripped topsoil and around 81% of cut-and-fill material would be retained on site for reuse, enabling reinstatement of baseline landform levels following decommissioning. The framework also sets out a mechanism for the preparation and approval of a detailed Decommissioning Plan by the Local Planning Authority and the Environment Agency at the environmental permit surrender stage. Officers consider that this additional information provides greater certainty regarding restoration feasibility, although it

does not alter the conclusion that the development would give rise to significant, albeit localised, landscape and visual harm during its operational lifetime.

Officers do not dispute the existence, nature or local significance of the landscape and visual harm identified by the Council's Senior Landscape Officer. The difference between officers and the Landscape Officer relates to the planning judgement as to the weight to be attributed to that harm when assessed against the wider development plan and material considerations. In assessing that weight, officers have had regard to the wider landscape context. While locally valued and sensitive, this part of the Cotswold Water Park is characterised by a mixed and working landscape influenced by a range of utilitarian, recreational and industrial features alongside agriculture. A building materials supplier operated by Aggregate Industries lies approximately 120 metres to the south-east, while a small residential enclave lies around 350 metres to the south-west. Sailing lakes, associated buildings, holiday parks, caravan accommodation and related infrastructure are present within the surrounding landscape. In the wider area, Lakeside Business Park, industrial buildings on the edge of South Cerney, Hills Quarry and other former or active mineral sites, together with a sewage treatment works, are perceptible. These elements contribute to a landscape that has long been shaped by human intervention and change.

This context does not negate the landscape and visual harm identified, but it does inform the sensitivity of the receiving environment and the weight to be attributed to that harm in the overall planning balance.

It is also relevant that this part of the Cotswold Water Park functions as a managed agricultural landscape. Core Policy 51 recognises that landscapes are functional as well as aesthetic, encompassing places to live, work and produce. The National Planning Policy Framework supports the sustainable growth and diversification of agricultural and rural businesses, alongside the conservation of the intrinsic character and beauty of the countryside. The proposal would support the viability of surrounding farm holdings and would not result in the permanent loss of agricultural use, subject to restoration. While this does not negate the identified harm, it provides important context in balancing landscape protection with the continued functioning of the rural economy.

Officers place significant weight on the Landscape Officer's evidence that the proposal would cause adverse localised effects, particularly in relation to landform change and close-range receptors, and accept that these impacts engage Core Policy 51, including its emphasis on protecting topographical features, important views and tranquillity. However, officers also note that Core Policy 51 and Core Policy 54 recognise the Cotswold Water Park as a landscape created and influenced by long-running mineral extraction and ongoing change. In that policy context, the receiving environment is a managed and evolving landscape where change can be acceptable where effects are contained and proportionate.

Officers' conclusion that the proposal is acceptable in landscape terms is predicated on the revised scale and massing of the development, the extensive structural planting proposed, and the imposition of robust and enforceable planning conditions securing decommissioning and restoration of the landform to pre-development levels. On that basis, while the proposal would result in moderate localised harm to landscape character and close-range views, that

harm is not considered to undermine the overall integrity of the Cotswold Water Park landscape and is afforded moderate weight in the planning balance.

Representations have also emphasised the highly distinctive character of the western part of the Cotswold Water Park, noting the significant proportion of open water, interlinked lakes, wetland habitats and recreational uses, and suggesting that this results in a landscape of heightened sensitivity to industrial development.

Officers acknowledge the particular characteristics of this part of the Water Park, including its strong association with water, recreation and ecological value. These attributes have been taken into account in the landscape and visual assessment, including in the weighting applied to harm.

The conclusion of moderate adverse landscape and visual impact reflects not only the scale and visibility of the development but also the sensitivity of the receiving environment. However, for the reasons set out above, including the non-designated status of the landscape, the proposed mitigation and the reversible nature of the development, this harm is not considered to be unacceptable.

Officers also agree with the Landscape Officer that the proposal cannot reasonably be equated to agricultural development in landscape terms, given its industrial character and engineered landform changes. The acceptability of the scheme does not rely on any comparison with agricultural buildings.

In considering landscape capacity, officers also note that the wider Cotswold Water Park / Upper Thames Valley is identified in adopted minerals planning policy as the principal area for sand and gravel extraction, with several allocated sites intended to deliver substantial land use change over the plan period. While mineral extraction is not directly analogous to anaerobic digestion, it typically involves extensive excavation, landform alteration and long-term operational activity. Against that backdrop, a temporary development subject to restoration represents a comparatively less intrusive form of development in principle.

This context does not remove the identified harm but informs its scale and weight in the overall planning balance.

Landscape context and future land use assumptions

Representations have suggested that the assessment of landscape and visual effects relies upon an assumption that the nearby North End Works site will continue in industrial use for the foreseeable future, and that this has been used in part or in whole to justify the proposal. This is not the case.

Reference to the existing aggregate operations at North End Works is made solely to describe the current baseline landscape context, which includes a range of human influences and large-scale development. This contextual information does not override or negate the landscape and visual effects of the proposed development, which have been assessed on their own merits.

At present, there is no planning permission or adopted allocation for redevelopment of the North End Works site, and any potential future change of use, including for residential development, is speculative. In accordance with established planning principles, such hypothetical future scenarios attract very limited weight in decision-making.

In any event, the redevelopment of the site, whether for housing or other forms of development, would itself represent a form of human intervention within the landscape. The assessment of landscape and visual effects must therefore be undertaken against the existing baseline rather than uncertain future outcomes. Recent housing development within the wider area has demonstrated that new development can occur notwithstanding local sensitivity and objection and does not alter the fact that landscape character in this location is already influenced by development.

Officers are satisfied that the proposal has been assessed against a correct and robust baseline, and that the presence of other development in the area has been used to inform context rather than to justify harm.

Conclusion

Officers place significant weight on the professional advice of the Council's Senior Landscape Officer and accept that the proposal would result in discernible and adverse localised landscape and visual effects notwithstanding the points raised in the applicant's rebuttal. These impacts are afforded moderate weight, reflecting their localised extent, the absence of landscape designation, and the temporary and reversible nature of the development, subject to enforceable decommissioning and restoration controls.

The proposal would introduce tall and bulky industrial structures and engineered landform changes into a sensitive and locally valued part of the Cotswold Water Park, resulting in moderate adverse effects for close-range receptors, particularly in the early years of operation, with residual effects likely to remain perceptible over the longer term.

However, having regard to the revised design, reduced scale and massing, extensive structural planting, the mixed and working character of the receiving landscape, and the policy support for renewable energy development, officers conclude that the identified landscape harm would not undermine the overall integrity of the Cotswold Water Park landscape. While the proposal does not fully comply with Core Policy 51 and relevant Neighbourhood Plan policies in landscape terms, the degree of harm identified is not considered sufficient, when assessed against the development plan as a whole, to justify refusal.

Core Policy 42 expressly anticipates that standalone renewable energy development may give rise to localised landscape impacts, and requires decision-makers to balance those impacts against the wider benefits of renewable energy generation. In this case, while the proposal conflicts with Core Policy 51 in landscape terms, that conflict does not, of itself, warrant refusal when assessed against the development plan as a whole.

The identified landscape and visual harm is therefore afforded moderate weight as a material consideration in the overall planning balance, subject to the imposition of appropriate planning conditions and legal controls securing mitigation, decommissioning and restoration.

Importantly, decommissioning and restoration are not optional or aspirational elements of the scheme; they will be secured by a clearly enforceable planning condition requiring the submission, approval and implementation of a detailed Decommissioning and Restoration Plan, with full restoration of landform and soils if the development ceases or at the end of the approved operational period.

6.6 Loss of Agricultural Land (Best and Most Versatile Land)

Policy Context

The NPPF requires decision-makers to recognise the economic and wider benefits of the best and most versatile (BMV) agricultural land (Grades 1, 2 and 3a). Paragraph 187(b) emphasises the need to protect such land where possible, and the Planning Practice Guidance (PPG Paragraph 001, Ref ID: 8-001-20190721) clarifies how agricultural land quality should be considered in the planning process.

Grade 3 land can fall within BMV (3a) or non-BMV (3b). In Wiltshire, much of the rural area is characterised by undifferentiated Grade 3 land, and Natural England's published classification does not always distinguish between Grades 3a and 3b at site-specific level.

Local policy does not preclude development on agricultural land but requires that impacts are minimised and justified. Policy WDC2 of the Waste Development Control Policies DPD similarly advises that BMV land should be protected unless overridden by wider sustainability considerations.

Assessment

Agricultural Land Classification and Scale of Loss

The application site comprises approximately 6.99 ha of agricultural land. The Provisional Agricultural Land Classification mapping identifies the land as Grade 3, which may comprise either Best and Most Versatile (BMV) agricultural land (Subgrade 3a) or non-BMV land (Subgrade 3b).

Since the preparation of the earlier assessment, a detailed site-specific Agricultural Land Classification (ALC) survey has been undertaken in accordance with the MAFF (1988) guidelines, based on soil sampling, trial pits and field survey. This provides a more reliable and site-specific assessment of land quality than either the Provisional or Predictive datasets. The submitted ALC survey identifies that the site comprises:

- approximately 0.9 ha of Grade 2 land;
- approximately 0.9 ha of Subgrade 3a land; and
- approximately 2.8 ha of Subgrade 3b land.

On this basis, approximately 1.8 ha of the site (circa 39%) falls within the definition of BMV agricultural land, with the majority of the site comprising land of moderate quality (Subgrade 3b).

More recent Predictive Agricultural Land Classification mapping indicates that the land may fall within Grade 1; however, this dataset is strategic and model-based, derived from national soil and climate datasets rather than site-specific survey work. Natural England advises that the Predictive ALC mapping is indicative only and should not be relied upon as definitive at site level, particularly where detailed survey evidence is available. In this case, the site-specific ALC survey is afforded greater weight.

The ALC survey identifies soil wetness as the principal limiting factor across the site, resulting from slowly permeable subsoils and seasonal waterlogging. This constraint restricts agricultural operations and working windows.

In addition, the higher quality land (Grades 2 and 3a) is fragmented and interspersed within areas of poorer quality land, such that it cannot be accessed and managed separately in practical farming terms. Evidence submitted alongside the ALC assessment indicates that, due to these constraints, the site functions as a single agricultural unit limited by the characteristics of the lower quality land, rather than as discrete areas of higher quality BMV land.

This conclusion is supported by available yield data, which demonstrates that crop performance across the site is consistently below national averages, reflecting underlying soil and drainage constraints.

Accordingly, whilst a proportion of BMV land is present, the extent is relatively limited and its functional agricultural value is constrained.

Justification for the Loss of Agricultural Land

The site lies within an established agricultural landscape where land of similar or comparable quality is widespread. The submitted site selection evidence indicates that avoiding Grade 3 land entirely would significantly constrain locational options and would be unlikely to materially reduce agricultural land impacts in this part of Wiltshire.

There is no evidence to indicate that the site represents an unusually high-quality or strategically important parcel of agricultural land within the wider holding, nor that its loss would undermine the viability of the agricultural unit.

Balancing Loss Against Agricultural and Public Benefits

The proposal would result in the temporary removal of agricultural land from active production for the operational lifetime of the development. However, this loss is not permanent. The site would remain capable of restoration to agricultural use following decommissioning, secured through planning conditions.

This temporary and reversible nature of the development is a material consideration in assessing the degree of harm.

Agricultural benefits include:

- support for local farm businesses through a stable market for crops and agricultural by-products;
- production of digestate as a substitute for artificial fertiliser, providing benefits in soil structure, nutrient management and reduced carbon intensity;
- contribution to farm diversification and resilience within the agricultural sector.

Environmental and public benefits include:

- generation of renewable, low-carbon biomethane contributing to climate change objectives;
- biodiversity enhancements through habitat creation and long-term land management;
- support for national energy security through increased domestic renewable energy production.

Overall Judgement on Agricultural Land Loss

The proposal would result in the temporary use of approximately 6.99 ha of agricultural land. The majority of the site comprises land classified as Subgrade 3b (moderate quality), with a smaller proportion falling within the Best and Most Versatile (BMV) category.

Whilst the presence of BMV land is noted, the extent of such land is limited and its functional agricultural value is constrained by site-specific factors, including wetness, fragmentation and reduced productivity. As such, the land does not make a significant contribution to high quality agricultural production in practice.

Taking these factors into account, together with the temporary and reversible nature of the development, the proposal would not result in a meaningful or permanent loss of versatile agricultural land.

Conclusion

On balance, the use of agricultural land in this instance is considered acceptable and justified, having regard to:

- the predominance of moderate quality (Subgrade 3b) land across the site;
- the limited extent and constrained functionality of the BMV land identified;
- the temporary and reversible nature of the development; and
- the wider agricultural, environmental and renewable energy benefits arising from the proposal.

In this context, the proposal would not give rise to any material harm to agricultural land resources. Accordingly, it is considered to accord with the aims of the NPPF in safeguarding BMV land, alongside Core Strategy objectives and Policy WDC2 of the Waste Development Control Policies DPD.

6.7 Impact on Amenity of Nearby Properties

Policy Context

Paragraph 135 of the NPPF requires that development achieves a high standard of amenity for existing and future occupants. This includes safeguarding against unacceptable levels of noise, disturbance, air pollution, odour and light.

Core Policy 57 of the Wiltshire Core Strategy requires development to be compatible with adjoining uses and to protect the amenities of existing residents. It highlights the need to avoid unacceptable impacts relating to privacy, overshadowing, noise, vibration, pollution, light intrusion and general disturbance.

Policies WDC1 and WDC2 of the Waste Development Control Policies DPD require waste-related development to avoid, mitigate or compensate for amenity impacts, including noise, odour, air quality, lighting and visual disturbance.

These policy requirements form the basis for the amenity assessment below.

Assessment

Overall Compatibility of Use and Local Context

The site is located within a rural agricultural landscape characterised by dispersed farmsteads; tourism uses and recreational assets of the Cotswold Water Park. The nearest residential properties lie approximately 335m from the operational area. At this separation distance, and with bunding, planting and enclosed processes, the proposal is considered compatible with nearby sensitive receptors in amenity terms. The following topic-specific impacts have been considered in detail.

Overlooking and Loss of Privacy

The development consists of functional industrial structures with no habitable rooms, elevated platforms or viewpoints. There are no windows or openings facing residential properties, and the nearest dwelling lies well beyond typical overlooking distances. Existing hedgerows proposed bunding and structural planting further reinforce separation.

Finding: The proposal would not result in loss of privacy or overlooking. It complies with CP57.

Loss of Light and Overshadowing

All built structures are positioned centrally within a 6.99 ha site and are separated from residential properties by over 300 m. Overshadowing impacts typically arise at distances far shorter than those involved here. The agricultural landscape between the site and nearby properties limits potential shadowing effects.

Finding: No loss of daylight or sunlight would occur; CP57 is satisfied.

Overbearing Impact and Outlook

The AD facility includes tanks and process buildings that are tall in relative terms; however:

- the tallest structures are positioned towards the centre of the site
- the cluster of residential properties at the Cotswold Community lies over 300 m away
- landscape bunding and new woodland belts will soften views over time

Even during early operational years, separation distances prevent any sense of enclosure or visual dominance. The development will remain a perceptible but distant feature in the wider rural panorama.

Finding: The proposal would not be overbearing and would not unacceptably alter the outlook for neighbouring occupiers.

Noise and Disturbance

The Noise Impact Assessment predicts:

- low daytime noise impact at nearest receptors
- nighttime rating levels 5–7 dB above background, requiring mitigation

Public Protection recognises the low background noise levels in this rural location and recommends conditions to secure:

- enhanced plant attenuation
- operational noise limits
- post-installation verification and monitoring
- restrictions on construction hours
- submission of a Construction Environmental Management Plan (CEMP)

The AD process itself is largely enclosed, and routine operations can be effectively controlled through modern plant specification.

Finding: With robust conditions, residual noise impacts can be reduced to acceptable levels consistent with CP57 and WDC policies.

Lighting

The lighting scheme has been assessed against ILP GN01/21 for Environmental Zone E2. The design incorporates:

- downward-directed luminaires
- low-spill fittings
- warm-white colour temperatures
- limited operational area coverage

At 300+m separation, and with bunding/planting, measurable light spill at dwellings will be negligible.

Finding: The lighting scheme is acceptable and can be controlled by condition.

Air Quality

Dispersion modelling demonstrates that predicted pollutant concentrations at residential and school receptors remain well below guideline thresholds. Traffic emissions and dust risks during construction are low and can be mitigated through the CEMP.

Finding: Air quality impacts are acceptable subject to standard controls.

Odour

Odour impacts have been assessed using a qualitative approach, having regard to the nature of the proposed development, the characteristics of the receiving environment and the proximity of sensitive receptors. Public Protection has highlighted the need for appropriate assurance in this case, given the rural tranquillity of the surrounding area, prevailing south-westerly wind direction and separation distances to nearby receptors in excess of 300 metres.

The proposed facility incorporates a number of inherent design and operational measures intended to minimise odour generation, including enclosed material handling, covered storage and controlled process areas. These measures provide a degree of mitigation at source and are typical of modern anaerobic digestion facilities.

National advice within the Planning Practice Guidance is clear that, where development is subject to the Environmental Permitting regime, planning authorities should avoid duplicating controls that are more appropriately secured and enforced through permitting. In particular, the PPG advises that matters such as odour management, operational controls and ongoing monitoring are normally controlled through the Environmental Permit issued by the Environment Agency, rather than through planning conditions. The Environment Agency has established guidance requiring the submission, approval and ongoing implementation of an Odour Management Plan as part of the permitting process, where there is potential for odour impacts.

From a planning perspective, the key consideration is whether the development is acceptable in principle and whether odour impacts are likely to give rise to unacceptable harm, rather than the detailed operational management of odour over the lifetime of the facility. Taking account of the embedded design measures, the scale and nature of the proposal, and the separation distances involved, it is considered that odour impacts are capable of being adequately managed.

Accordingly, while detailed odour control will be secured through the Environmental Permit, it is reasonable to conclude that, subject to compliance with permitting requirements, odour impacts arising from the development are not expected to be unacceptable in planning terms.

Ongoing management and regulatory control will be delivered through the Environment Agency's permitting and enforcement regime.

Construction Amenity

Construction activities have the potential to cause short-term disturbance through noise, dust and traffic. These can be effectively managed through a CEMP, limiting hours of work, routing, dust suppression and community liaison measures.

Finding: Construction impacts are acceptable with a CEMP.

Third Party Representations

Concerns regarding odour, noise, traffic, health impacts and the erosion of rural tranquillity have been carefully considered. The technical evidence confirms that these matters can be mitigated. Public Protection's requested conditions address the identified uncertainties (notably noise), and odour matters are addressed through the embedded design measures and the separate Environmental Permitting regime.

Finding: Public concerns are acknowledged, but do not indicate unacceptable amenity impacts once mitigation is secured.

Officers have also considered the cumulative effect of noise, odour, lighting and traffic on nearby receptors and are satisfied that, taken together and subject to mitigation, these impacts would not result in unacceptable harm to residential amenity.

Conclusion

Subject to comprehensive mitigation secured by condition, including noise limits and verification, Construction Environmental Management Plan (CEMP), lighting controls and other amenity protections, the proposed development would not result in unacceptable effects on the amenity of nearby residential properties or other sensitive receptors. Odour impacts have been assessed and are not expected to give rise to unacceptable effects in planning terms; detailed odour management will be regulated through the Environmental Permitting regime.

The separation distances, enclosed processes, landscape buffering and the ability to control residual impacts through enforceable conditions ensure that the development can achieve a high standard of amenity for nearby occupiers throughout its operational life.

The proposal therefore accords with NPPF paragraph 135, Core Policy 57 of the Wiltshire Core Strategy, and Policies WDC1 and WDC2 of the Waste Development Control Policies DPD.

6.8 Wider Environmental Considerations (Noise, Air Quality, Contaminated Land, etc.)

Policy Context

The National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG) emphasise that planning decisions must prevent new and existing development from contributing to, or being exposed to, unacceptable levels of pollution. This includes ensuring that proposals do not create risks to health, well-being, or the environment.

Within the Wiltshire Core Strategy, Core Policies 55 and 56 require that development avoids unacceptable environmental impacts and safeguards the health and amenity of surrounding communities and future site users. The Council's Air Quality Supplementary Planning Document (SPD) provides detailed guidance on assessing and mitigating air quality impacts, particularly in or near Air Quality Management Areas (AQMAs).

In addition, Core Policy 57 addresses amenity considerations, requiring that development avoids or mitigates potential pollutants such as noise, air pollution, odour, vibration, light spill, and land contamination. This is particularly relevant for large-scale commercial, industrial, or infrastructure projects, where operational impacts may be significant.

Furthermore, Policies WDC2 and WDC4 of the Waste Development Control Policies DPD require waste management development to avoid unacceptable impacts arising from contamination, air emissions or pollution.

Links:

[Wiltshire Core Strategy - Wiltshire Council](#)

[National Planning Policy Framework - GOV.UK](#)

[Air quality - GOV.UK](#)

[Land affected by contamination - GOV.UK](#)

[Land stability - GOV.UK](#)

[Light pollution - GOV.UK](#)

[Noise - GOV.UK](#)

Assessment

In addition to the amenity impacts on nearby receptors considered above, the proposal has been assessed more widely in terms of its potential effects on the environment, including pollution risk, land quality, water resources, designated sites and operational safety. These matters are addressed through the Environmental Statement (ES), the subsequent ES Addendum, and consultee responses.

A particular concern raised consistently in representations relates to the proximity of the proposal to the Cotswold Water Park lakes and the allegation that the facility would result in pollution of those waterbodies. This issue is considered in detail below, having regard to the identified source–pathway–receptor relationships assessed in the ES.

Noise (Environmental Context)

While noise impacts on residential amenity are addressed above, it is also relevant to consider noise in a broader environmental context. The submitted Noise Impact Assessment and subsequent update conclude that operational noise from the facility would be low in absolute terms and would not give rise to significant adverse effects on the wider environmental soundscape beyond the site boundary. The assessment demonstrates compliance with BS4142 and the Noise Policy Statement for England, with predicted effects remaining below levels associated with adverse or significant adverse effects.

Public Protection raises no objection on noise grounds subject to conditions securing operational noise limits, verification testing and ongoing monitoring. With these controls in place, the proposal would not give rise to unacceptable environmental noise effects, nor would it undermine the wider environmental quality of the area.

Air Quality, Odour and Emissions

Air quality has been comprehensively assessed through the submitted Air Quality Impact Assessment and the 2025 Addendum, which consider emissions during both construction and operation. These assessments address a wide range of potential pollutants including oxides of nitrogen, ammonia, particulates, bioaerosols and odour, as well as potential effects on designated ecological sites within the wider Cotswold Water Park.

The modelling demonstrates that predicted concentrations of pollutants would remain well below relevant human health standards and ecological critical thresholds. Importantly, nitrogen deposition and ammonia concentrations at designated sites, including the Cotswold Water Park SSSI and associated lakes, are predicted to be insignificant and well within accepted limits. There is therefore no evidence of any mechanism by which airborne emissions from the facility would lead to eutrophication or degradation of water quality within the lakes.

Construction phase dust impacts are assessed as not significant and readily controllable through standard good practice measures secured via a Construction Environmental Management Plan (CEMP).

Odour has been assessed using an accepted source–pathway–receptor methodology, in accordance with IAQM and Environment Agency guidance. The assessments conclude that odour impacts would not be significant in environmental terms, including in relation to recreational users of the lakes, having regard to the operational controls that would be required and regulated through the Environmental Permitting regime. Public Protection raises no objection subject to such controls, which is considered proportionate and consistent with national guidance – as previously stated, these controls would be through the EA permitting regime.

To clarify therefore, from a planning perspective, odour impacts have been assessed having regard to the nature of the development, the characteristics of the receiving environment, the separation distances to sensitive receptors, and the embedded design measures proposed. On this basis, officers are satisfied that odour impacts are unlikely to give rise to unacceptable effects in land-use planning terms.

Detailed operational controls, including the preparation, approval and ongoing implementation of an Odour Management Plan, fall within the scope of the Environmental Permitting regime administered by the Environment Agency. National guidance advises that such matters should not be duplicated through planning conditions where they are more appropriately and robustly controlled through permitting.

Accordingly, it is reasonable and lawful to rely on the Environmental Permitting regime to regulate odour, and no specific planning condition is imposed in respect of odour control

Overall, subject to relevant planning conditions (where applicable) and the separate Environmental Permitting regime, the proposal would not result in unacceptable air quality, odour or atmospheric deposition effects on the wider environment or the waterbodies of the Cotswold Water Park.

Operational Traffic and Vehicle Emissions

During the operational phase, vehicle movements associated with the facility would primarily comprise:

- biomethane tankers transporting gas to the Banbury injection hub; and
- agricultural vehicles delivering feedstock and removing digestate.

As set out in the Environmental Statement, the applicant's operational model provides for biomethane-fuelled HGVs for the transport of biomethane to the hub, which would substantially reduce exhaust emissions compared to conventional diesel vehicles. This approach is consistent with the wider objective of decarbonising transport associated with the development.

In relation to agricultural traffic, it is acknowledged that tractors and HGVs delivering feedstock and removing digestate are likely to be diesel-powered. However, the Transport Assessment and Air Quality Impact Assessment make clear that a significant proportion of this agricultural traffic already occurs on the local highway network as part of existing farming operations. The proposal therefore consolidates, rather than introduces, a large proportion of movements, with only a modest net increase in vehicle trips.

The Air Quality Impact Assessment assesses operational traffic emissions on a worst-case basis and concludes that emissions of oxides of nitrogen and particulates arising from vehicle movements would remain well below relevant air quality objectives, with no significant effects at human or ecological receptors. Given the rural location, low baseline traffic flows and the limited scale of additional movements, operational traffic would not give rise to unacceptable air quality effects.

Overall, taking account of the use of biomethane-fuelled tankers, the existing baseline of agricultural traffic, and the conclusions of the Air Quality Impact Assessment, operational vehicle movements would not result in significant pollution or conflict with air quality objectives.

Land Quality and Contamination

Land quality and contamination risks are addressed through the Preliminary Land Quality Risk Assessment and ES Chapter 8. The site itself comprises undeveloped agricultural land, with no evidence of significant on-site contamination identified through desk study, site walkover or preliminary investigation.

Potential off-site contamination sources, including a closed landfill to the east of Ashton Road, have been identified and assessed. The qualitative risk assessment concludes that, with appropriate design and mitigation, risks to human health, controlled waters and the environment would be low. Further investigation, verification and, if necessary, remediation can be secured through planning conditions to ensure the site is suitable for its intended use and would not meet the definition of contaminated land under Part 2A of the Environmental Protection Act 1990.

On this basis, the proposal is considered acceptable in land quality terms and consistent with the objectives of the NPPF and Policies WDC2 and WDC4.

Water Environment, Hydrology and Hydrogeology

The hydrological and hydrogeological effects of the development are addressed in ES Chapter 6 and the updated Flood Risk Assessment. The site lies within Flood Zone 1 and is not at risk of fluvial flooding.

The ES identifies the extensive network of lakes within the Cotswold Water Park, with the closest lakes located approximately 350–400 metres from the site. These lakes are man-made waterbodies primarily associated with historical mineral extraction and are fed by local groundwater, surface water flows and, in some cases, interactions with the wider Thames catchment.

The assessment carefully examines whether a credible source–pathway–receptor linkage exists between the proposed development and these lakes. The ES demonstrates that:

- The site is underlain by low-permeability Kellaways Clay, which acts as an effective aquitard, significantly limiting downward or lateral migration of contaminants;
- Where superficial sands and gravels are present, these are discontinuous and limited in extent across the site;
- All potentially contaminated areas of the development (including silage clamps, digestate storage, process areas and refuelling areas) are located on sealed hardstanding with sealed drainage systems;
- Clean and dirty water systems are fully segregated, with contaminated runoff retained within the process and reused, rather than discharged;
- Any surface water discharge from the site is limited to clean water only, discharged at greenfield rates via designed attenuation features and subject to treatment, with no direct discharge to lakes;
- No routine discharge of process water, digestate or effluent to groundwater, surface watercourses or lakes is proposed.

As a result, the ES concludes that there is no credible mechanism by which pollutants from the site could migrate to the surrounding lakes, either during construction or operation. The

Environment Agency raises no objection, noting that matters relating to groundwater protection, surface water management and pollution prevention will also be regulated through the Environmental Permitting regime.

In addition to the above, a technical representation has been received from a qualified hydrogeologist challenging the applicant's interpretation of the site's geology and hydrogeological behaviour. In particular, it is asserted that the Kellaways Clay may not act as a fully impermeable barrier, and that measured permeability values indicate the potential for the ground to behave as a "leaky" formation, allowing preferential pathways for groundwater movement toward the surrounding gravel aquifer and interconnected lake system.

These concerns are noted. However, the application has been supported by a detailed site-specific ground investigation and hydrogeological assessment, which have been subject to independent review through the consultation process. The Environment Agency, as the statutory consultee in respect of groundwater protection, raises no objection to the proposal.

The assessment adopts a precautionary approach, incorporating engineered containment and pollution prevention measures and assuming no reliance on natural ground conditions for containment. Having regard to this approach, and the regulatory controls that would be applied through the Environmental Permitting regime, officers are satisfied that the risks to groundwater and the wider water environment have been adequately assessed and can be appropriately controlled.

In addition, the development incorporates a range of engineered containment and pollution prevention measures, including bunded silage clamps, lined digestate lagoons, sealed drainage infrastructure and the segregation of clean and contaminated water. These measures are designed to ensure that no uncontrolled discharges arise and to prevent any pathway for pollutants to reach surrounding receptors, including the nearby SSSI.

Concerns have also been raised regarding the potential presence of unrecorded sub-surface drainage features and their role as preferential pollutant pathways. However, the proposed development does not rely on natural ground conditions to provide environmental protection. Instead, the design incorporates fully engineered containment measures, including impermeable surfacing, sealed drainage systems, and lined storage infrastructure.

As a result, the potential presence of localised or historic drainage features does not materially alter the assessment of risk, as there is no mechanism by which pollutants would be discharged to the ground or enter such pathways under normal operation. This approach has been reviewed through the consultation process, and the Environment Agency has raised no objection on this basis.

Furthermore, the CEMP, secured by condition, will include detailed measures for the prevention of pollution to land, groundwater and surface waters during the construction phase, including fuel storage, refuelling, wheel washing, runoff management and incident response procedures.

This ensures that pollution risks arising during the construction phase, prior to the installation of permanent drainage and containment infrastructure, are appropriately identified, controlled

and mitigated. The Environment Agency and Lead Local Flood Authority have raised no objection subject to such controls, confirming that construction-phase risks can be satisfactorily managed.

Operational Safety and Accident Risk

Potential risks associated with accidents, including fire, gas release and extreme weather events, are considered within ES Chapter 11 and supporting documentation. The assessment concludes that the likelihood of major accidents or disasters is low, given the nature of the development, its location and the regulatory controls governing anaerobic digestion facilities. The site will operate within a highly regulated framework, including the Environmental Permitting regime and health and safety legislation. Measures such as enclosed processes (including bunding, secondary containment, sealed drainage), automated monitoring systems, controlled access, and detailed operational procedures are proposed to minimise risk. These matters are considered capable of being appropriately managed through the Environmental Permitting regime and relevant health and safety legislation, and do not indicate unacceptable environmental risk.

Relationship Between Planning Permission and Environmental Permitting

It is important to clearly distinguish between the planning and environmental permitting regimes, particularly given the concerns raised regarding the site's proximity to the Cotswold Water Park SSSI and references to Environment Agency guidance.

Planning permission and Environmental Permitting are separate statutory regimes, with different purposes, legal tests and decision-makers. The planning system is concerned with the acceptability of development in land-use terms, having regard to planning policy and material considerations. The Environmental Permitting regime, administered by the Environment Agency, regulates how a facility operates, including emissions, pollution prevention, accident risk, and compliance with Best Available Techniques.

Guidance referred to by third parties regarding a 500-metre distance from SSSIs forms part of the Environment Agency's permitting screening and risk-assessment framework. This is not planning policy, does not represent a statutory exclusion zone, and does not preclude development within that distance. Rather, it identifies circumstances where the Environment Agency will require more detailed site-specific risk assessment and mitigation as part of the permitting process i.e. a standard rules permit will not be applicable and the applicant will need a bespoke permit application. In practice this means tighter scrutiny of odour, emissions, leachate, runoff and potentially more onerous controls.

The Local Planning Authority must determine the application before it on the basis of planning considerations. It is well established that planning permission should not be withheld solely because an Environmental Permit has not yet been issued, provided there is no clear or substantive evidence that the development could not be lawfully operated. That threshold is not met in this case.

The Environment Agency has reviewed the application and raises no objection to the grant of planning permission, noting that detailed matters relating to emissions, groundwater

protection, odour, accident prevention and SSSI protection will be controlled through the Environmental Permitting regime. Should the Environment Agency ultimately refuse a permit, the development could not lawfully operate, regardless of planning permission. However, that remains a matter for the separate permitting process and does not determine the planning merits of the proposal.

On this basis, the proximity of the site to the SSSI, and references to permitting guidance, do not prevent the Local Planning Authority from granting planning permission in principle, subject to appropriate conditions and the separate requirement to obtain an Environmental Permit.

The Environmental Permitting regime provides an additional, legally enforceable layer of control specifically focused on pollution prevention and protection of controlled waters, including designated sites such as the Cotswold Water Park SSSI. The absence of an objection from the Environment Agency indicates that, in principle, there is no fundamental barrier to the facility operating without causing pollution to nearby lakes, subject to permit controls.

Cumulative Effects

Officers have considered the potential cumulative effects of emissions, runoff, land quality and operational risk in combination with other existing and proposed developments in the area. No cumulative pollutant pathways to the lakes or wider water environment have been identified. Given the absence of routine discharges, the containment of contaminated waters on-site and the separation of regulatory regimes, the proposal would not, either alone or cumulatively, give rise to unacceptable impacts on the lakes or the integrity of the Cotswold Water Park.

Conclusion

The wider environmental effects of the proposed anaerobic digestion facility have been comprehensively assessed through the submitted Environmental Statement, Addendum and consultee responses. Subject to appropriate mitigation secured by planning condition and the operation of separate regulatory regimes, the proposal would not result in unacceptable impacts in respect of noise, air quality, odour, land contamination, water resources or operational safety.

Whilst public concern regarding pollution of the Cotswold Water Park lakes is acknowledged and has been carefully considered, the Environmental Statement demonstrates that there is no credible pollution pathway linking the proposed anaerobic digestion facility to the surrounding lakes.

Accordingly, the development is considered to accord with the environmental protection objectives of the NPPF, Core Policies 55, 56 and 57 of the Wiltshire Core Strategy, and Policies WDC2 and WDC4 of the Waste Development Control Policies DPD.

6.9 Highway Safety and Parking

Policy Context

Chapter 9 of the NPPF requires development to ensure safe and suitable access for all users (paras. 110 & 115), to prioritise sustainable travel (para. 117) and confirms that proposals should only be refused on highway grounds where impacts on safety would be unacceptable, or where residual cumulative impacts would be severe (para. 116).

Core Policies 60–64 of the Wiltshire Core Strategy require development to provide safe access, avoid severe impacts on the transport network, promote sustainable transport, supply appropriate parking, and safeguard public rights of way.

Policies WDC1 and WDC11 of the Waste Development Control Policies DPD require waste related development to demonstrate safe access, appropriate routing, and that highway impacts can be mitigated to avoid unacceptable effects on safety or amenity.

The Ashton Keynes Neighbourhood Plan adds a local layer of policy:

- Policy INP2 – development must not worsen road or pedestrian safety risks.
- Policy ENP2 – encourages protection and enhancement of footpaths, bridleways and cycleways.

These policies provide the framework for assessing the proposal's highway impacts.

Assessment

Access Design and Highway Safety

The proposal includes upgrading the existing agricultural access onto Ashton Road to a fully engineered priority junction with appropriate junction radii, visibility splays (2.4m × 160m) and swept path-tested geometry. These meet national and local design standards and ensure articulated HGVs, tractor-trailers and service vehicles can enter and exit safely.

Crucially, the gates are set back approx. 35 m from the carriageway edge, enabling the largest HGV to wait clear of the highway should the site be closed temporarily. This responds directly to Highways' earlier request for increased setback to prevent highway obstruction.

Ashton Road already accommodates existing HGV traffic from agricultural and industrial uses, and accident data indicates no pattern of HGV-related collisions or underlying highway deficiencies. Collision data for the most recent five-year period was reviewed by the Highway Authority. While a small cluster of personal-injury collisions was identified at the junction of Spine Road and Ashton Road, these incidents did not involve HGVs and were attributed primarily to driver error, typically vehicles overshooting the give-way line. The junction has since been subject to improvement works, and there is no evidence of a systemic safety issue associated with HGV movements. On this basis, and with the improved junction arrangement, the highway environment is suitable for the scale and type of vehicles proposed.

Wiltshire Highways have confirmed no objection, subject to standard access construction and visibility conditions, a Construction Management Plan (CMP), and pre- and post-construction condition surveys.

In addition to vehicular traffic, concerns have been raised regarding the crossing of the Thames Path National Trail in the vicinity of the Spine Road, particularly in relation to visibility and potential conflict between HGV movements and non-motorised users. This matter has been considered.

The Thames Path crosses the local highway network at an existing at-grade location, and as such represents a shared interface between vehicular traffic and recreational users typical of a rural road environment. The proposal does not introduce a new crossing point but would result in an increase in HGV movements along this route.

The Highway Authority has assessed the impact of the proposed development on highway safety, including for vulnerable users, and raises no objection subject to conditions. The presence of recreational users, including cyclists and pedestrians, is recognised as an existing characteristic of the local highway network, particularly during peak tourism periods. The proposal does not introduce a materially different type of vehicle to that already experienced on the network, and the Highway Authority is satisfied that the development would not give rise to an unacceptable impact on safety. Having regard to the scale and distribution of vehicle movements, the nature of the receiving road network, and the absence of any identified pattern of collisions attributable to HGV traffic, officers are satisfied that the development would not give rise to an unacceptable risk to pedestrian or cyclist safety at this location.

Notwithstanding this, the use of the route by both vehicular and recreational users is acknowledged, and the proposal is therefore considered against the requirement of the National Planning Policy Framework to provide safe and suitable access for all users. On balance, it is considered that the residual impacts would not be severe and would not justify refusal on highway safety grounds.

Officer judgement: The access arrangement satisfies NPPF paras. 110 & 115 and CP60–61. Highway safety impacts are acceptable.

Traffic Generation and Residual Cumulative Impact

During normal operation, the facility would generate approximately 37–44 HGV/tractor trips per day, with seasonal peaks of up to around 80 trips per day during harvest periods. Importantly, around half of these movements are already present on the local highway network, reflecting existing agricultural traffic associated with the same local farms. In addition, the export of biomethane for grid injection would give rise to a very limited number of HGV movements, equating to two HGV trips within each 12-hour period. These vehicles would utilise the Spine Road and A419 via agreed HGV routes, which are designed to accommodate large vehicles, and would not materially alter the overall traffic profile of the development.

On this basis, the Transport Assessment identifies that only around 52% of the forecast operational HGV movements would represent new trips on the highway network. In numeric terms, this equates to approximately 18 additional HGV movements per day above those already occurring, with the remainder reflecting existing agricultural vehicle movements that would be redirected to the facility. This distinction has been taken into account by the Highway Authority when assessing the scale and significance of the development's traffic impact.

The Transport Assessment demonstrates that the majority of the feedstock is expected to be sourced from within a 10-mile radius of the site, as illustrated at Figure 7. This local sourcing significantly limits trip lengths, reduces reliance on the strategic road network and reinforces the conclusion that the development largely redistributes existing agricultural traffic rather than introducing wholly new movements.

Vehicle movements would be dispersed throughout the day, consistent with agricultural practices, and would not coincide with typical commuter peak hours. Harvest-related increases would occur over two distinct seasonal periods, typically early summer (June–July) and early autumn (September–October), rather than a single concentrated peak period. These periods generally fall outside the busiest summer holiday months within the Cotswold Water Park. Notwithstanding this, it is recognised that tourism bodies, including Visit Wiltshire, actively promote the area as a year-round destination and that these months can still experience elevated background traffic levels.

Further representations raise concerns regarding the interaction between development-related traffic and peak visitor activity within the Cotswold Water Park, including organised recreational events such as cycling and triathlon events, as well as potential implications for emergency access to leisure facilities and lakeside destinations.

These matters have been considered as part of the overall assessment of seasonal and peak traffic conditions. The Transport Assessment has been reviewed by the Local Highway Authority, including in the context of elevated background traffic associated with tourism and recreational activity.

The scale of additional traffic generated by the development remains modest when considered within the capacity of the local and strategic highway network, and no evidence has been provided to demonstrate that emergency access or event management would be materially compromised. It is recognised that not all agricultural activity generates off-site vehicle movements. However, a proportion of agricultural transport already takes place on the local highway network, and the development would in part redistribute and consolidate such movements, alongside a degree of net increase which has been assessed within the submitted Transport Assessment. Officers are therefore satisfied that these concerns do not indicate impacts that would approach the threshold of “severe” as set out in the NPPF.

Wiltshire Council, as local highway authority, has considered the proposed traffic generation in the context of seasonal tourism activity, holiday traffic and other normal background flows. Even when assessed on a robust worst-case basis, including harvest peaks, the additional traffic would not give rise to a severe impact on the operation or safety of the highway network at any time of year.

The potential for temporal overlap between peak harvest activity, increased recreational traffic associated with the Cotswold Water Park, and existing HGV movements (including those associated with permitted mineral extraction activities) has also been considered. Whilst it is recognised that these uses may coincide during summer months, no substantive evidence has been provided to demonstrate that such overlap would result in the local or strategic highway network operating unacceptably.

Although Wiltshire and Gloucestershire share highway authority responsibility for sections of the Spine Road, there is no direct residential frontage along the affected length between Ashton Road and the A419. Access to holiday accommodation within the Water Park is provided via dedicated park entrances with sufficient internal waiting capacity, such that development-related traffic would not give rise to undue highway safety or amenity impacts.

Construction traffic associated with the 70-week construction phase would be controlled through a Construction Management Plan (CMP). This would secure appropriate routing via the B4696 and A419, on-site parking, wheel-washing facilities and traffic management measures by planning condition, ensuring that construction impacts remain temporary and manageable.

In addition, the impacts of operational traffic are further mitigated through the imposition of conditions controlling both the timing and management of vehicle movements. Conditions are attached to restrict feedstock deliveries and the export of digestate to defined daytime hours, with limited flexibility during peak harvest periods only, and to require the submission and implementation of an Operational Traffic Management Plan (OTMP). These measures will secure defined routing, on-site traffic management and the scheduling of vehicle movements, including for third-party farm operators. The OTMP will incorporate route mapping, driver instructions and compliance monitoring measures to ensure that routing assumptions are enforceable in practice and adhered to by all vehicles associated with the development. Subject to these conditions, the residual cumulative impacts of the development on the local highway network would not be severe.

In addition, the Operational Traffic Management Plan will be required to include a defined routing strategy for all development-related vehicles. This will ensure that all HGV traffic is routed via the A419 and B4696 Spine Road as the primary corridor, while also incorporating specific measures to minimise additional HGV movements at sensitive at-grade junctions on the A419, in accordance with National Highways' requirements. The OTMP will also include routing compliance measures, driver instructions and vehicle management protocols to ensure adherence to the approved routes. This will also include measures to minimise the use of sensitive at-grade junctions on the A419, including the Water Eaton Lane / Seven Bridges junction, in accordance with National Highways' recommendations.

The OTMP will also secure measures to ensure adherence to the approved routing, including driver instructions, contractual controls and on-site management procedures. This will provide a proportionate and enforceable mechanism to manage vehicle movements and directly addresses concerns regarding potential routing through unsuitable parts of the network.

Concerns around the enforceability of conditions controlling vehicle numbers and the Operational Traffic Management Plan (OTMP) is a valid concern to consider. However, officers are satisfied that these controls are both reasonable and enforceable in practice. The operation of the facility inherently requires all vehicles to pass over a weighbridge on entry and exit, as part of the applicant's commercial processes for recording inbound feedstock and outbound digestate volumes. This generates a continuous and auditable record of all vehicle movements to and from the site.

These records are also required to be maintained under the Environmental Permitting regime, providing an additional layer of regulatory oversight. As such, the operator will already be obliged to retain accurate data relating to vehicle movements, which can be made available to the Local Planning Authority upon request.

The combination of on-site weighbridge monitoring and regulatory record-keeping ensures that compliance with any condition relating to vehicle numbers, routing, or the OTMP can be readily verified. Officers therefore conclude that the proposed conditions are robust, proportionate, and capable of effective enforcement.

In cumulative terms, the local highway network, including the B4696 Spine Road and the A419, has sufficient capacity to accommodate the proposed development traffic well within accepted thresholds. The Spine Road was originally designed and subsequently upgraded to accommodate regular HGV traffic associated with mineral extraction and related industrial uses within the Cotswold Water Park. Its geometry, construction and operating characteristics are therefore appropriate for the type and scale of vehicle movements proposed. The highway authority agrees with this conclusion and has maintained its position of no objection, including following the 2024/2025 scheme refinements which further reduced overall vehicle movements.

National Highways has been consulted in respect of potential impacts on the A419 Strategic Road Network and raises no objection subject to conditions. Their response confirms that the A419 corridor is capable of accommodating the proposed level of traffic, including at the grade-separated Cirencester Road junction.

However, National Highways highlight that certain at-grade junctions on the A419, in particular the Water Eaton Lane (Seven Bridges) junction, are more sensitive to additional turning movements. They therefore request that an Operational Traffic Management Plan (OTMP) is secured by condition to:

- define agreed HGV routes to and from the site;
- minimise use of sensitive at-grade junctions;
- include measures to manage and monitor routing compliance; and,
- set out scheduling and management of vehicle movements.

These requirements are considered proportionate and are capable of being secured through the OTMP condition.

In addition to the above, concerns have been raised by third parties regarding the timing of crop harvesting and whether the applicant has accurately represented the seasonal distribution of vehicle movements, with particular reference to the suggestion that activity would be concentrated during the peak summer holiday period.

The Transport Assessment identifies that vehicle movements associated with the development would arise from a range of agricultural activities, including the harvesting of different feedstocks (such as grass, maize and other rotational crops), which occur at different times of the year rather than within a single uniform period. As such, the assessment reflects

a broader pattern of seasonal activity typical of mixed agricultural operations, rather than reliance on a single harvest window.

In any event, the Transport Assessment assesses traffic generation on a robust basis, including peak periods of activity associated with harvesting operations. Whilst the Transport Assessment is based on a defined survey period, it has been supplemented by the consideration of worst-case operational scenarios, including peak harvest activity. The assessment is therefore not reliant solely on average traffic conditions but incorporates the highest realistic levels of vehicle movement associated with the development. It is this assessed level of traffic, including seasonal peaks, which forms the basis of the Highway Authority's conclusion that the residual cumulative impacts would not be severe.

Planning decisions must be based on the evidence submitted with the application and the professional advice of consultees. Taking all of the above into account, including seasonal variation, peak harvest activity and cumulative traffic sources, the evidence before the Council does not demonstrate that the development would result in an unacceptable impact on highway safety or a severe residual cumulative impact on the road network, having regard to the NPPF. Whilst concerns have been raised by third parties and the adjoining highway authority regarding the robustness of the assessment, no substantive evidence has been provided to demonstrate that the submitted Transport Assessment materially understates peak traffic impacts or that the development would result in severe impacts on the network.

This pattern of activity, including the duration and scale of peak movements, reflects the information set out within the applicant's technical submissions and does not indicate a concentration of movements solely within the peak summer holiday period

Officer judgement: Having regard to national policy, including paragraph 116 of the National Planning Policy Framework, the residual cumulative impacts of the development on the highway network would be well below the level at which refusal could be justified. There is no sound highway or traffic-related reason to withhold planning permission. Officers conclude that both construction and operational traffic impacts can be appropriately managed through routing, timing and operational controls. These controls are secured through the recommended planning conditions, including the submission of an Operational Traffic Management Plan and restrictions on hours of HGV movements.

Following the committee meeting, the applicant has provided further clarification in response to matters raised during debate, particularly in relation to the volume and seasonality of HGV movements. This information does not materially alter the conclusions of the Environmental Statement or the professional advice of the Highway Authority, which remains unchanged.

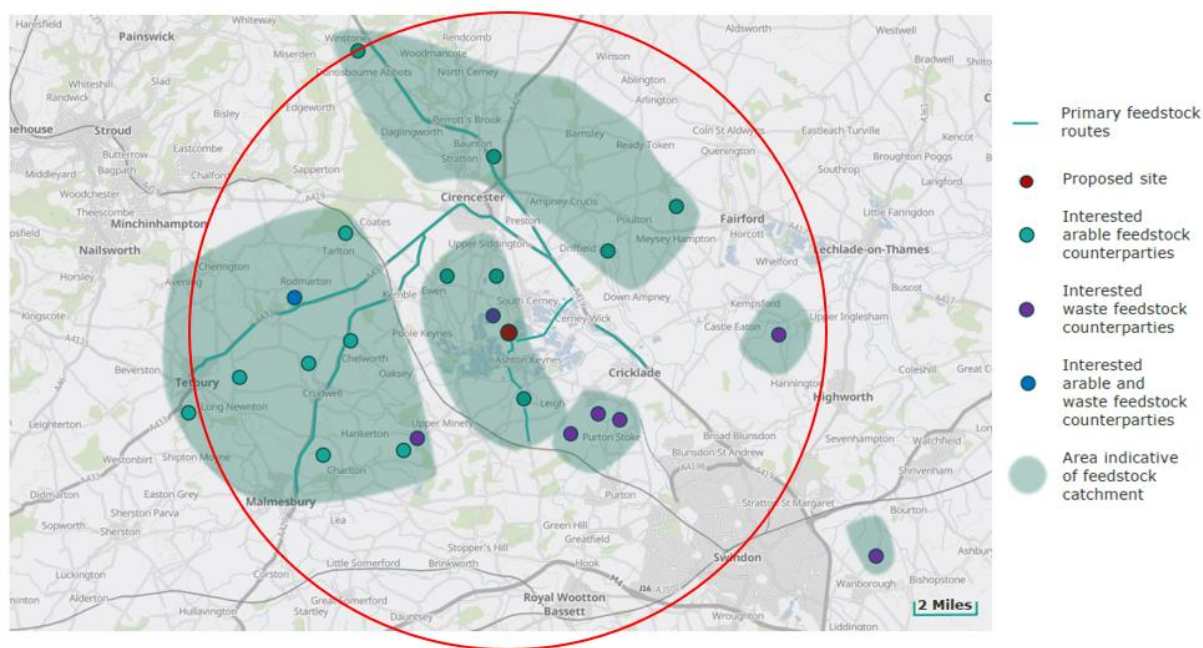


Figure 7 – Plan showing primary feedstock routes with the majority feedstock catchment area (a 10-mile radius)

Gloucestershire County Council Highways

Gloucestershire County Council, as the adjoining Highway Authority, raises a holding objection to the application.

The objection principally relates to the adequacy and robustness of the submitted transport evidence, particularly in respect of cross-boundary impacts on the Gloucestershire highway network. Key concerns include:

- the reliance on a limited traffic survey dataset and absence of detailed origin–destination analysis;
- uncertainty regarding the scale, distribution and routing of development traffic, particularly during peak seasonal conditions associated with tourism and agricultural activity;
- the assumption that a proportion of movements represents redistribution of existing agricultural traffic;
- the adequacy of the assessment in capturing the full extent of inbound and outbound movements; and
- the suitability of the rural highway network to accommodate additional HGV traffic.

Gloucestershire County Council considers that further information is required to demonstrate that the impacts of the development have been fully assessed and that residual cumulative impacts would not be severe. The objection is therefore maintained on the basis of insufficient information.

Officer Response to Gloucestershire County Council Highway Objection

Officers have carefully considered the consultation response from Gloucestershire County Council (GCC) as the adjoining Highway Authority, which raises a holding objection on the basis of the adequacy of the submitted transport evidence and uncertainty regarding cross-boundary impacts.

The principal concern raised by GCC relates to the level of detail within the Transport Assessment, including the absence of a detailed origin–destination analysis and the reliance on a limited survey period. Whilst these points are noted, it is important to distinguish between an absence of absolute certainty and the planning test set out within the NPPF.

Paragraph 116 of the NPPF is clear that development should only be refused on highway grounds where:

- the residual cumulative impacts are severe, or
- there would be an unacceptable impact on highway safety

In this case, the proposal has been subject to detailed assessment by Wiltshire Council as the Local Highway Authority, which raises no objection to the development subject to conditions. This includes consideration of:

- traffic generation, including seasonal variations;
- the proportion of movements representing redistribution of existing agricultural traffic;
- the capacity and suitability of the local and strategic highway network; and
- the cumulative operation of the network, including during peak periods.

The Highway Authority is therefore satisfied that:

- the submitted evidence is proportionate and robust for the purposes of decision-making; and
- the residual cumulative impacts of the development would not be severe, having regard to the tests set out in the NPPF.

In reaching this conclusion, the Local Highway Authority has had regard to site-specific traffic evidence, including Automatic Traffic Count data for Ashton Road, which confirms that existing HGV movements already form a modest proportion of total traffic flows. When considered alongside the limited scale of additional HGV movements associated with the proposal, officers are satisfied that the development would not result in a material change in traffic conditions or approach the thresholds at which highway capacity or safety concerns would arise.

With regard to GCC's concerns:

- Survey period and seasonal variation: the Transport Assessment includes assessment of peak harvest conditions and has been reviewed by the Local Highway Authority in the context of tourism and seasonal traffic flows. No evidence has been provided to demonstrate that the network would operate unacceptably under these conditions.
- Trip redistribution: whilst GCC raises concerns regarding the extent of redistribution, the assessment and conclusions of the Local Highway Authority confirm that a

substantial proportion of traffic reflects existing agricultural movements. Even where additional trips arise, the overall increase in traffic is limited in scale.

- Geographic extent and routing: the development benefits from direct access to the B4696 Spine Road and A419, which are designed to accommodate HGV traffic. An Operational Traffic Management Plan, secured by condition, will provide appropriate controls over routing and vehicle management, notably requiring all HGV movements to route via the A419 and B4696 Spine Road.
- Electronic monitoring of movements to increase control could be discussed with the applicant.
- Rural road network constraints: no evidence has been provided to demonstrate that the modest increase in traffic would result in unsafe conditions or unacceptable impacts on the operation of the network.

Overall, GCC's objection is based on a precautionary approach and a desire for further information, rather than clear evidence that the development would result in unacceptable or severe impacts.

In the absence of substantive evidence demonstrating harm that would meet the NPPF test for refusal, and having regard to the professional advice of the Local Highway Authority, officers are satisfied that the development would not result in an unacceptable impact on highway safety or a severe residual cumulative impact on the transport network.

While Gloucestershire County Council has maintained a holding objection, Wiltshire Council, as the Local Highway Authority for the site access and the principal routes within its administrative area, is satisfied that the Transport Assessment is proportionate and robust for the purposes of decision-making, and that the development would not result in an unacceptable impact on highway safety or a severe residual cumulative impact on the transport network. No substantive evidence has been submitted to demonstrate otherwise.

Accordingly, the objection from Gloucestershire County Council is noted but is not considered to outweigh the clear conclusion that the proposal would not result in an unacceptable impact or a severe residual cumulative impact.

Parking, Internal Circulation and On-Site Management

The proposal includes:

- Six staff/visitor car parking spaces, sufficient for the very low employee numbers (fifteen FTE).
- Five HGV/trailer bays for biomethane and CO₂ transport operations.
- A 70 m internal access road providing extensive queuing capacity, preventing any stacking on Ashton Road.

Wiltshire Highways confirm that both the number and arrangement of parking spaces are acceptable and compliant with standards. Cycle parking is not explicitly shown; however, given the rural context, absence of footways or cycle infrastructure, very low staffing levels and the nature of the use, this is not considered a material omission in policy terms.

Officer judgement: The development provides appropriate parking and internal circulation in accordance with CP64 and the Wiltshire LTP.

Sustainable Transport Considerations

The rural context limits realistic opportunities for walking and cycling. However:

- Staff numbers are very low.
- Feedstock is sourced locally, reducing unnecessary transport miles.
- HGV routing avoids unsuitable minor roads.
- Traffic management measures will be secured during construction.

Given the operational nature of the use and geographical context, the proposal represents a proportionate and reasonable response to sustainable transport policy.

Officer judgement: The proposal aligns with NPPF para. 117 and WCS CP60–61 in balancing sustainable transport aspirations with functional rural requirements.

Third-Party Representations

Concerns have been raised relating to:

- HGV volumes
- Highway safety
- Traffic impacts on rural lanes
- Cumulative effects with other developments

These concerns have been carefully considered. The professional evidence, together with the response from Highways, confirms:

- The access is safe and suitable
- Traffic impacts do not approach “severe”
- Construction impacts can be fully controlled by a CMP
- Routing can avoid unsuitable minor lanes

In addition, third party references to other anaerobic digestion facilities (e.g. Castle Eaton) have been noted and carefully considered. However, each proposal must be assessed on its own planning merits, having regard to its specific location, transport characteristics and operational arrangements. The site-specific transport assessment, including routing and network capacity analysis, provides the appropriate basis for determining the impacts of this development.

As such, while public concerns are understandable, they do not indicate impacts that would justify refusal under national or local policy.

Cumulative Development

No other committed or consented developments have been identified that would materially alter this conclusion on cumulative highway impact.

Conclusion

The proposed development provides a safe and suitable access, appropriate internal layout and parking, and would not result in an unacceptable impact on highway safety or a severe residual cumulative impact on the transport network. Traffic levels associated with both construction and operation can be appropriately managed through routing, timing and construction management controls, and necessary safeguards, including access construction details, visibility splays, Construction Management Plan and condition surveys, can be secured by condition. This includes control over vehicle routing secured through the Operational Traffic Management Plan, which will require a clearly defined routing strategy. This will fix all HGV movements to the strategic road network via the A419 and B4696 Spine Road, with a separate routing strategy for agricultural vehicles designed to minimise traffic through surrounding villages and other sensitive rural receptors.

Wiltshire Council, as Local Highway Authority, raises no objection to the proposal. Whilst a holding objection has been received from Gloucestershire County Council in respect of cross-boundary impacts, this is based on concerns regarding the level of supporting information rather than evidence of severe impact. Officers are satisfied, having regard to the submitted Transport Assessment and the advice of the Local Highway Authority, that the development would not result in an unacceptable impact on highway safety or a severe residual cumulative impact on the network.

In addition, the response from National Highways provides further assurance that the development would not adversely affect the Strategic Road Network, subject to appropriate controls over vehicle routing. The requirement to minimise use of sensitive at-grade junctions on the A419, secured through the OTMP, reinforces the robustness of the overall transport strategy and ensures that impacts on the wider network are appropriately managed.

The proposal therefore complies with NPPF paragraphs 110–117, Core Policies 60–64 of the Wiltshire Core Strategy, Policies WDC1 and WDC11 of the Waste Development Control Policies DPD, and the relevant transport policies of the Ashton Keynes Neighbourhood Plan.

6.10 Impact on Aircraft Safeguarding and Aviation Operations

Policy Context

National planning policy requires development to be designed and located so as to avoid giving rise to unacceptable risks to safety, including those arising from interference with nationally important infrastructure. While the development plan does not contain specific policies relating to aviation safeguarding, this matter is a material consideration and is addressed through national technical guidance and statutory consultation arrangements.

Certain civil and military aerodromes are safeguarded to ensure that their safe operation is not compromised by new development. For civil aerodromes, this process is guided by the

Civil Aviation Authority's publication CAP 738: Safeguarding of Aerodromes, which seeks to prevent development that could infringe obstacle limitation surfaces, interfere with navigational or radar systems, create hazardous lighting or glint and glare, or increase bird strike risk. A similar safeguarding regime applies to military aerodromes, including RAF Fairford and RAF Brize Norton, under Ministry of Defence aviation safeguarding procedures.

Assessment

The application site lies within the wider consultation areas associated with Cotswold Airport and the military aerodromes at RAF Fairford and RAF Brize Norton. Given the scale of the proposed structures and the nature of the development, the Civil Aviation Authority and the Ministry of Defence have been consulted in respect of aircraft safeguarding matters.

A technical aviation safeguarding assessment has been submitted in support of the application, prepared by York Aviation (a specialist air transport consultancy that focusses on airport planning, demand forecasting, strategy, operation and management having been commissioned in the past by the Department for Transport (DfT) and the CAA), which considers the potential effects of the proposal on nearby civil and military aerodromes, including Cotswold Airport (Kemble), RAF Fairford, and the smaller airstrips at Oaksey Park and South Cerney.

The assessment has been undertaken with reference to the Civil Aviation Authority's safeguarding framework, including CAP 168 (Licensing of Aerodromes), CAP 738 (Safeguarding of Aerodromes) and CAP 772 (Wildlife Hazard Management). These documents provide the established basis for assessing potential impacts on aviation safety, including obstacles, lighting, operational procedures, and wildlife hazards.

Proximity to Aerodromes and Operational Context

The application site is located approximately 7.8km east of Cotswold Airport and approximately 10.8km west-south-west of RAF Fairford. Whilst situated between these aerodromes, the site is not in close proximity to any runway threshold or within areas typically associated with low-level aircraft manoeuvring such as circuit patterns or approach corridors. The smaller airstrips at Oaksey Park and South Cerney are also sufficiently distant and operate on a limited or informal basis.

Having regard to this spatial relationship, the site does not fall within the routine low-level operational environment associated with any nearby aerodrome.

Physical Obstruction and Obstacle Limitation Surfaces (OLS) Compliance

The tallest element of the development would be the post-digester tank at approximately 16.5m in height, with most other structures ranging between 9m and 10m.

At the distances involved, the relevant OLS, including the outer horizontal surface, are estimated to be in the order of 150m above aerodrome level. On this basis, the proposed structures would sit substantially below the safeguarded airspace envelope.

Officers are therefore satisfied that the development would not penetrate the OLS associated with either Cotswold Airport or RAF Fairford and would not give rise to physical obstruction or hazard to aircraft operations.

Flight Paths and Airspace Use

The assessment identifies no established approach, departure or circuit flightpaths passing directly over or in close proximity to the site. A published missed approach procedure for Runway 08 at Cotswold Airport passes to the east of the site; however, this is a contingency manoeuvre rather than a routine operational path, and aircraft would be at a significantly elevated altitude (typically several hundred metres above ground level) at this point.

The absence of regular low-level aircraft activity over the site further supports the conclusion that the proposal would not conflict with established flight operations.

Lighting, Thermal Plume and Operational Effects

The proposed development includes operational lighting and an emergency flare. The lighting scheme is not of a scale or configuration that would be capable of being confused with aerodrome lighting systems, nor is it of a proximity or intensity that would give rise to pilot distraction or dazzle.

Whilst gas venting has the potential to give rise to localised turbulence, the CAA does not prohibit such activities; instead, risks are managed through established notification procedures (including the issue of NOTAMs where necessary) and through the maintenance of appropriate separation from aircraft flight paths, i.e. the system manages risk through notification and airspace awareness rather than prohibition.

In this case, the submitted Aviation Note confirms that any venting would be limited in extent and frequency, with any associated plume being localised and dissipating rapidly with height. Given the separation distances from nearby aerodromes and the altitude of aircraft operating in the vicinity, the development would not give rise to a material aviation safety risk. Officers have no substantive evidence to disagree with these conclusions.

Following the submitted Aviation Note, further information was provided (an Air Quality Technical Note by Earthcare Technical) in response to preliminary comments from the Ministry of Defence regarding the potential effect of emissions from the Combined Heat and Power (CHP) units on aviation operations. This assessment considered plume visibility arising from condensed water, plume visibility arising from particulate matter, and potential turbulence associated with the CHP exhaust plume. The assessment concludes that no visible condensed water plume would be generated, that the CHP units would not emit particulate matter capable of causing visual impairment, and that any turbulence associated with the exhaust plume would dissipate rapidly and would not affect aircraft operations. Particular consideration was given to the published Runway 08 missed approach procedure at Cotswold Airport (Kemble), under which aircraft could pass approximately 310 metres east of the site at an altitude of approximately 425–510 metres above ground level. The assessment concludes that there would be no material impact on aircraft using this procedure from either plume visibility or turbulence. Officers have no substantive technical evidence before them to

disagree with these conclusions. On this basis, the additional information reinforces the conclusion that the proposal would not give rise to an unacceptable aviation safeguarding or operational safety risk.

Furthermore, the release (venting) of gas from the facility would be limited to emergency or maintenance scenarios and would not form part of routine operation. Such activities are subject to separate environmental permitting and regulatory control, which requires operators to minimise venting and obtain the necessary consents for its occurrence.

Wildlife Hazard

The facility comprises enclosed processing operations, covered storage and controlled drainage. It is not therefore considered to create features typically associated with increased bird activity or wildlife attraction. In this context, and having regard to CAP 772 guidance, the development is not considered to give rise to an increased bird strike risk. In addition, it is noted that Kemble's Aerodrome Manual does not identify Cotswold Water Park lakes as a bird strike risk. One would therefore question why such a facility as this would attract greater attention than the abundance of lakes where birdlife is plentiful.

Construction Considerations

The use of cranes or tall construction plant could temporarily extend above the development height. However, the requirement to notify such equipment under CAP 738 and CAP 1096 applies in any event given the proximity to aerodromes within 10 nautical miles. This is a standard safeguarding procedure and does not indicate any inherent safety concern.

Consultation Responses

At the time of writing, no responses have been received from the Civil Aviation Authority or the Ministry of Defence / Defence Infrastructure Organisation. However, the submitted assessment is consistent with established safeguarding principles, and no evidence has been identified to indicate that the proposal would give rise to aviation safety concerns.

Conclusion

Having regard to:

- the distance from nearby aerodromes,
- the limited height of the proposed structures,
- the absence of interaction with safeguarded airspace or routine flightpaths, and
- the nature of the proposed lighting, flare and operational characteristics,

officers are satisfied that the development would not give rise to adverse impacts on aviation safety or aerodrome safeguarding.

The proposal therefore accords with national policy and guidance relating to aviation safety and raises no objection in this respect.

6.11 **Ecology and Biodiversity**

Policy Context

The NPPF identifies areas of particular importance to be protected, as set out in Footnote 7 to paragraph 11, including irreplaceable habitats and Sites of Special Scientific Interest.

Chapter 15 of the NPPF (*Conserving and Enhancing the Natural Environment*) requires developments to minimise impacts on biodiversity and deliver net gains, including through coherent and resilient ecological networks and features that support priority species (Paragraph 187). Paragraphs 193–194 set out principles for determining applications, and Paragraph 195 confirms that the presumption in favour of sustainable development does not apply where a plan or project is likely to have a significant effect on a habitats site unless an appropriate assessment concludes no adverse effect on integrity.

Legislation now requires all major developments submitted since February 2024 to deliver a minimum 10% Biodiversity Net Gain (BNG), in line with the Environment Act 2021.

Core Policy 50 (Wiltshire Core Strategy) seeks to conserve and enhance biodiversity, requiring development to avoid harm to ecological assets and deliver measurable net gain.

The Council's *Green & Blue Infrastructure Strategy (2022–2030)* provides a framework for habitat connectivity, ecosystem services, and nature recovery.

Policy WDC8 of the Waste Development Control Policies DPD requires proposals to avoid harm to biodiversity and geological interests, with impacts to be mitigated or compensated only where avoidance is not possible. Development affecting protected species, habitats or designated sites must be supported by appropriate ecological assessment.

Ashton Keynes NP Policy – ENP1 – Biodiversity Protection: Development should minimise impacts on biodiversity and deliver net gains wherever possible. The Parish contains SSSIs, County Wildlife Sites and important ecological networks forming part of the wider Cotswold Water Park landscape.

Links:

[Wiltshire Core Strategy - Wiltshire Council](#)

[National Planning Policy Framework - GOV.UK](#)

[Natural environment - GOV.UK](#)

[Light pollution - GOV.UK](#)

[Biodiversity net gain - GOV.UK](#)

[Appropriate assessment - GOV.UK](#)

[Open space, sports and recreation facilities, public rights of way and local green space - GOV.UK](#)

Assessment

The Environmental Statement (ES) confirms that the site comprises intensively managed arable land of generally low ecological value, bounded by hedgerows and scattered mature

trees, with two shallow ditches present on site. The ES recognises the proximity of the Cotswold Water Park SSSI, which lies approximately 300–350m from the application site on three sides and is designated for its marl lakes, stonewort assemblages, wetland habitats and nationally important breeding and wintering bird populations. The ES concludes that the proposed development will not give rise to significant adverse effects on the SSSI, due to the nature of the development, the lack of hydrological connectivity, the absence of marl-forming lakes or suitable aquatic habitats on site, and the implementation of pollution prevention and surface-water management measures. The ES further reports that the site supports typical farmland birds, foraging bats and common terrestrial fauna, including a number of Red and Amber List bird species recorded at a level considered to be of local importance, reflecting the arable nature of the site rather than any intrinsic habitat quality.

The ES confirms that impacts to retained hedgerows, trees and boundary habitats can be avoided through design and mitigation, that light-spill can be controlled to protect commuting/foraging bats, and that habitat enhancements, including hedgerow strengthening, species-rich grassland and biodiversity net gain (BNG) planting, would provide measurable ecological improvements. The ES concludes that no significant residual ecological effects are predicted, either alone or cumulatively, following mitigation.

The ecological surveys undertaken (2023 Preliminary Ecological Appraisal, bat surveys, wintering and breeding bird surveys, and the 2025 updated ecological assessment) confirm that the site supports arable habitat of low ecological value, with boundary hedgerows and occasional mature trees providing the main ecological interest. The surveys recorded moderate foraging and commuting activity by widespread bat species and confirmed the presence of pipistrelle day roosts within one off-site boundary tree previously surveyed. The site provides opportunities for nesting farmland birds (including skylark), small numbers of wintering birds, and low-level use by widespread species such as hedgehog, badger and common reptiles. No evidence of great crested newts, dormice, invasive plants, or other high-value ecological receptors was identified.

The updated 2025 assessment confirms that ecological conditions and species use of the site have not changed materially since the original baseline, and earlier survey results remain valid. Biodiversity Net Gain calculations indicate the potential to deliver a 10%+ net gain through hedgerow enhancement, native tree planting, species-rich grassland, and the off-site mitigation area previously identified for farmland birds. Overall, the surveys identify no ecological constraints that cannot be satisfactorily mitigated.

The comments of Natural England are consistent with the findings of the Environmental Statement and subsequent ecological updates, which conclude that the site itself is of low intrinsic ecological value and that there is no direct hydrological connectivity between the application site and the marl lakes and wetland habitats for which the SSSI is designated. The proposed mitigation measures, including pollution prevention, SuDS, and emergency incident controls, are considered sufficient to ensure that the development would not result in significant adverse effects on designated sites or protected species.

Wiltshire Council's Ecologist has reviewed the submitted ecological information alongside Natural England's advice and raises no objection, subject to conditions securing the recommended mitigation, monitoring and long-term management measures.

Third parties have expressed concerns regarding the site's proximity to the Cotswold Water Park SSSI, noting that the development lies within 300–350m of the designated lakes, less than the 500m buffer advised by the Environment Agency in some circumstances. Concerns were raised that the site lies within a Groundwater Source Protection Zone 2 and a Nitrate Vulnerable Zone, and that any pollution incident could harm the rare marl-forming lake system, stonewort species, and the wider SSSI ecology. Representations also raised concerns about potential impacts on protected species, disturbance to wildlife, and the loss of farmland bird habitat. All such comments have been fully considered.

Key considerations in the assessment of this application include:

Impact on Designated Sites and Protected Species:

The site comprises intensively managed arable land with hedgerows, mature boundary trees and two dry ditches. These habitats hold limited ecological value, although hedgerows and boundary trees provide locally important features for bats, nesting birds and general wildlife. The development avoids direct loss of high-value habitats and incorporates mitigation to protect retained hedgerows and trees, including a 5m buffer, root-protection measures and a sensitive lighting scheme. The ES demonstrates that the Cotswold Water Park SSSI will not be adversely affected: there is no surface-water connection to the marl lakes; the site is hydraulically contained; and pollution-prevention and SuDS measures will control runoff risk. Noise and visual disturbance effects are considered minor, and the agricultural nature of the site means it does not contribute significantly to the SSSI's notified interest features, with farmland birds recorded in low numbers.

While the proximity of the development to the Cotswold Water Park SSSI is a matter of significant sensitivity, officers are satisfied, having regard to the Environmental Statement and consultation responses, that subject to the proposed mitigation and controls, the development would not result in an unacceptable adverse effect on the integrity or qualifying features of the designated site.

On this basis, the competent authority can be satisfied that the proposal would not be likely to have a significant effect on the Cotswold Water Park SSSI, either alone or in combination, and therefore no Appropriate Assessment is required under the Habitats Regulations.

The development incorporates appropriate mitigation for bats, breeding and wintering birds and general fauna, including timing restrictions, precautionary working methods and habitat creation. The surveys identify that the site supports breeding and wintering farmland birds, including skylark and other Red and Amber List species, at a level considered to be of local importance, albeit at relatively low densities typical of intensively managed arable land. In order to address this impact, the applicant has committed to off-site farmland bird mitigation through a Unilateral Undertaking, securing habitat management measures designed to benefit red and amber listed species. While this mitigation is discussed in detail within the Section 106 / planning obligations section of this report, it is noted here that the approach is consistent with the mitigation hierarchy and contributes positively to local and strategic biodiversity objectives.

Furthermore, Policy WDC8 requires the avoidance, mitigation or compensation of impacts on biodiversity and geological interests. As stated above, the submitted ecological assessments indicate that, subject to mitigation and management measures, the development would not result in significant harm to protected species or priority habitats. With appropriate conditions securing mitigation and biodiversity enhancements, the proposal is considered compliant with Policy WDC8.

Delivery of Biodiversity Net Gain:

This application was submitted in 2023 and therefore the mandatory statutory Biodiversity Net Gain requirement does not apply; however, the applicant has proposed net gains which are treated as a material benefit in the planning balance.

The Biodiversity Net Gain assessment demonstrates the ability to exceed the required (for applications submitted after February 2024) statutory 10% requirement, in accordance with the Environment Act 2021, through hedgerow enhancement, woodland edge planting, species-rich grassland and habitat creation.

LNRS (Local Nature Recovery Strategy)

Representations also raise concerns regarding the compatibility of the proposal with the Wiltshire and Swindon Local Nature Recovery Strategy (LNRS), particularly in relation to potential impacts on water quality, air quality, noise and light disturbance affecting sensitive habitats.

The LNRS is a material consideration which seeks to guide strategic nature recovery and environmental enhancement. In this case, the proposal has been assessed against the relevant development plan policies and national guidance, supported by detailed ecological, air quality and water environment assessments.

Subject to the mitigation measures proposed, including habitat creation, landscape planting and pollution control systems, officers are satisfied that the development does not conflict with the overarching objectives of the LNRS and would not give rise to unacceptable impacts on ecological receptors.

Habitat Connectivity and Green Infrastructure:

The scheme also contributes to the Council's Green & Blue Infrastructure Strategy by strengthening ecological connectivity and improving boundary habitats.

Summary

Taking account of Natural England's advice, the conclusions of the Environmental Statement, and the absence of objection from the Council's Ecologist it is considered that the proposal would not result in unacceptable harm to biodiversity or designated ecological sites and is therefore acceptable in ecological terms. Subject to conditions securing the CEMP, drainage and pollution controls, bat-sensitive lighting, Biodiversity Net Gain delivery, and long-term habitat management, together with the off-site farmland bird mitigation secured via the

Unilateral Undertaking, the proposal complies with NPPF Chapter 15, Core Policy 50, Policy WDC8, and the statutory Biodiversity Net Gain regime.

6.12 Flood Risk and Drainage

Policy Context

Chapter 14 of the NPPF requires planning decisions to ensure that development is directed to areas of lowest flood risk (Sequential Test) and that flood risk is not increased elsewhere. Paragraphs 170–182 require site-specific Flood Risk Assessments (FRAs) where appropriate and expect development to incorporate:

- Sustainable drainage systems (SuDS)
- Flood resistance and resilience measures
- Safe exceedance routing
- Pollution prevention and surface water controls
- No increase in off-site flood risk

Core Policy 67 of the Wiltshire Core Strategy requires development to manage flood risk sustainably, avoid increasing risk elsewhere, and incorporate SuDS unless inappropriate.

Policy WDC3 of the Waste Development Control Policies DPD requires waste-related development to protect groundwater, surface waters and drainage systems, and to demonstrate that flood risk is properly mitigated.

Ashton Keynes Neighbourhood Plan Policy INP1 requires development to avoid increasing local flood risk and to incorporate SuDS, reflecting local concerns linked to the Upper Thames Basin and high groundwater characteristics.

Assessment

Flood Zone Compatibility and Sequential Test

The site lies within Flood Zone 1, the lowest category of fluvial flood risk. Under NPPF criteria, such locations are appropriate for all types of development and satisfy the Sequential Test, with no requirement to consider alternative sites at lower flood risk. The Exception Test does not apply.

This establishes the site as acceptable in principle with regard to national flood-risk policy.

Surface Water Management and Drainage Strategy

Although fluvial risk is low, surface water management is a key consideration due to:

- Localised overland flow routes
- A low point near the site entrance
- Sensitivity of the wider Cotswold Water Park hydrological system

The drainage strategy adopts a SuDS-led approach, incorporating:

- A large attenuation tank (~1,529 m³)
- A wetland lagoon providing settlement and water-quality treatment
- Controlled discharge rates achieving 20% betterment against greenfield runoff
- Lined, impermeable surfacing beneath digestate handling areas
- Defined exceedance routing to prevent uncontrolled overland flow
- Pollution containment measures (bunding, sealed hardstanding, impermeable lagoon linings)

Updated technical submissions (2023–2025) addressed initial LLFA concerns regarding greenfield runoff calculations, water-quality modelling, exceedance plans, ditch maintenance and construction-phase pollution control.

Following these revisions, the LLFA confirmed no objection, subject to conditions securing final drainage details and SuDS maintenance provisions. The Environment Agency also issued no objection, noting that groundwater, odour and emissions safeguards will be regulated through the separate Environmental Permit.

The drainage strategy has also been designed with appropriate allowances for climate change and incorporates safe exceedance routing to ensure resilience during extreme rainfall events.

Officer judgement: The proposed SuDS and pollution-control measures are robust, policy-compliant and appropriate to the site's context.

Pollution Prevention and Water Environment Protection

Given the nature of AD operations, third-party representations have raised concerns regarding potential digestate spills reaching nearby ditches, lakes and ultimately the River Thames.

The scheme includes multiple layers of containment:

- Bunded, impermeable hardstanding
- Lined lagoons and sealed drainage
- Separate “clean” and “dirty” water systems
- Controlled runoff pathways directing water to treatment
- No direct hydrological connectivity is identified between operational areas and the Water Park lakes

The EA's no objection response confirms that the drainage and containment design is capable of preventing contamination in flood and exceedance scenarios, with operational controls further regulated through the Environmental Permit.

The site lies within a Source Protection Zone for groundwater abstraction. However, the presence of a Source Protection Zone does not in itself preclude development, but requires careful consideration of pollution risk through appropriate regulatory controls. These matters are addressed through the Environment Agency's permitting regime and consultation responses.

Officer judgement: Pollution pathway risks have been satisfactorily mitigated through design and can be further managed through enforceable planning and permitting controls.

Third-Party Representations

Concerns raised relate to:

- Localised flooding at the Ashton Road entrance
- Perceived vulnerability of low lying parts of the site
- Risk of digestate leakage into the Water Park and surrounding hydrological system
- Potential impacts on groundwater quality, including the absence of a standalone Groundwater Risk Assessment
- Adequacy of emergency procedures in extreme rainfall events

These concerns have been carefully considered. The technical evidence and consultation responses demonstrate that:

- The access area can be drained effectively via a SuDS-based system, with no increase in localised flood risk
- Surface water runoff and exceedance flows are controlled and directed away from sensitive areas, including the highway
- Containment measures, including impermeable surfacing, bunding and lined lagoons, prevent uncontrolled discharge of digestate or contaminated runoff
- The drainage and site design avoid direct hydrological connectivity between operational areas and nearby lakes and watercourses
- Groundwater and pollution risks are appropriately managed through engineered containment, drainage design and operational controls
- Emergency response measures and spill control procedures will be secured and regulated through the Environmental Permit regime
- Overall flood risk on and off site is reduced compared with the existing agricultural baseline

Officer judgement: The concerns raised in respect of flood risk, ims and groundwater protection are acknowledged. However, these matters fall within the remit of the Environment Agency and other statutory consultees, who have been consulted and raise no objection in respect of flood risk or groundwater quality. In these circumstances, the Council is entitled to rely on the advice of its statutory consultees in relation to these technical matters.

The proposal would also be subject to a separate environmental permitting regime, which controls matters relating to pollution prevention, storage, handling and the land application of digestate. This regulatory framework operates alongside the planning system and provides an additional layer of protection in respect of groundwater and surface water quality.

Taking these factors into account, and having regard to the technical evidence submitted, the proposal is not considered to give rise to an unacceptable risk of flooding or pollution.

Thames Water

Thames Water raises no objection to the proposed development. It advises that, whilst no public sewers are recorded within the site, there remains the potential for unmapped infrastructure following the private sewer transfer in 2011. Accordingly, a build-over agreement may be required should any public sewer be identified at the detailed design stage. This is an advisory matter and does not affect the acceptability of the development in planning terms.

In a subsequent response, Thames Water further advises that the site lies within a Source Protection Zone for groundwater abstraction and that activities may be subject to a risk-based regulatory approach. This updated response does not identify any specific technical objection to the proposed development.

Thames Water raises no objection in respect of groundwater or water infrastructure. Its comments are advisory in nature, referring to existing regulatory controls and guidance rather than identifying any deficiency in the submitted application.

Having regard to the submitted evidence, consultee responses, and the controls secured through planning conditions and the environmental permitting regime, officers are satisfied that the proposal would not give rise to any unacceptable risk of groundwater pollution, either during construction or operation.

Foul Drainage

With regard to foul drainage, the use of a sealed cesspit for welfare facilities is a standard and acceptable arrangement in locations where connection to mains sewerage is not available. The acceptability of such infrastructure, including its design, management and operation within Source Protection Zones, is a matter regulated through the Environmental Permitting and Building Regulations regimes.

Thames Water and the Environment Agency have both been consulted and raise no objection in respect of groundwater protection or water infrastructure. In the absence of any technical objection from the statutory consultees responsible for groundwater protection, officers are satisfied that this aspect of the development does not give rise to an unacceptable risk in planning terms.

Process Water Demand and “Self-Sufficiency”

A detailed third-party comments have been submitted asserting that the proposed development cannot achieve full process water self-sufficiency through rainwater harvesting and would therefore give rise to additional demand on mains water supply or groundwater resources.

The applicant's drainage and supporting technical information have been considered in consultation with the Lead Local Flood Authority, the Environment Agency and Thames Water. These bodies are the statutory consultees responsible for flood risk, water resources, groundwater protection and water supply infrastructure. No objection has been raised by any of these consultees in relation to water demand, water supply capacity, or the impact of the development on water resources.

The planning system does not require development to demonstrate full water self-sufficiency. The relevant test is whether the proposal would give rise to an unacceptable impact on water resources, groundwater or infrastructure capacity. On the basis of the consultation responses received and the technical information submitted, officers are satisfied that the proposal would not result in such impacts.

Matters relating to abstraction licensing, water supply connections, and detailed operational water management are subject to separate regulatory regimes, including the Environmental Permitting regime and the Water Resources Act 1991. These regimes operate alongside the planning system and are specifically designed to control the matters raised by third parties.

Accordingly, while these representations raise detailed technical points regarding the applicant's water balance assumptions, these do not demonstrate a planning harm or conflict with development plan policy that would justify refusal of permission.

Conclusion

The proposal is located within Flood Zone 1 and therefore satisfies the Sequential Test. The Exception Test is not required. The submitted Flood Risk Assessment, sustainable drainage strategy and subsequent revisions demonstrate that:

- Surface water will be managed sustainably
- Runoff rates will achieve at least a 20% betterment over the existing situation
- Pollution pathways are appropriately contained
- Flood risk on-site and off-site will not increase as a result of the development

The Lead Local Flood Authority and Environment Agency both raise no objection, subject to standard drainage and construction phase conditions.

The Council has undertaken consultation with all relevant technical bodies, including the Environment Agency and Thames Water. No substantive objection has been raised by these consultees in respect of groundwater quality, flood risk or wider water environment impacts. In the absence of any technical evidence to the contrary, there is no basis on which to conclude that the development would give rise to unacceptable impacts in these respects.

Accordingly, the proposal is considered to comply with the requirements of Chapter 14 of the NPPF, Core Policy 67 of the Wiltshire Core Strategy, Policy WDC3 of the Waste Development Control Policies DPD, and Policy INP1 of the Ashton Keynes Neighbourhood Plan.

6.13 Impact on Tourism and the Visitor Economy

Concerns have been raised by owners of holiday accommodation, tourism businesses, leisure operators and local residents regarding the potential impact of the proposed anaerobic digestion (AD) facility on the tourism and visitor economy of the Cotswolds Water Park. In particular, concerns relate to the perceived effects of the development on visual amenity and landscape character, local ecology, HGV movements on surrounding roads (including impacts

on recreational users and cyclists), and the potential for noise and odour to detract from visitors' enjoyment of the area.

The Cotswolds Water Park is a long-established visitor destination, valued for its lakes, landscape, biodiversity and recreational opportunities, and tourism forms an important component of the local and wider rural economy. These matters are therefore material planning considerations and have been afforded appropriate weight in the assessment of the application.

Policy Context

At the national level, the NPPF recognises the importance of supporting a prosperous rural economy, including sustainable tourism and leisure development that benefits local communities (Chapter 6). The Framework also supports the sustainable growth and expansion of all types of business in rural areas, including the development and diversification of agricultural and other land-based rural businesses. National policy therefore requires a balanced approach, rather than the protection of any single rural economic sector in isolation.

At the local level, relevant tourism policies of the Wiltshire Core Strategy include:

- Core Policy 39 (Tourist Development), which supports tourism development and rural employment where impacts are acceptable; and
- Core Policy 40 (Hotels, Bed and Breakfasts, Guest Houses and Conference Facilities), which supports visitor accommodation in appropriate locations, subject to acceptable impacts.

The application site also lies within the wider Cotswolds Water Park, an area whose character has evolved through decades of sand and gravel extraction, together with associated mineral, waste and industrial activities, alongside tourism and recreation. While the scale and number of such operational uses have reduced over time, they form part of the established character of parts of the Water Park and provide important context against which the impacts of the proposal must be assessed.

Assessment of Tourism Impacts

It is acknowledged that the proposed development would introduce a new industrial feature within the Cotswolds Water Park, and that this would result in some degree of visual change, additional HGV movements, and the potential for noise and odour effects, particularly given the site's proximity to recreational routes, lakes and visitor accommodation.

However, these matters have been assessed in detail through the submitted Environmental Statement and supporting technical evidence, including landscape and visual impact assessment, ecological assessment, noise assessment, odour assessment and transport assessment. Subject to the implementation of the proposed mitigation measures and recommended conditions, these assessments conclude that:

- Wider views and the overall landscape character of the Water Park would be preserved, with visual effects largely localised and further moderated over time through planting and screening;
- Ecological impacts would be managed and compensated through habitat protection and enhancement measures;
- Noise and odour effects would be controlled to acceptable levels through design, operational controls and monitoring regimes; and
- Traffic impacts, including during peak visitor periods, would not result in unacceptable or severe impacts on the highway network.

In this context, while the concerns raised by tourism operators and visitors are understandable, it is material that the Cotswolds Water Park has continued to experience strong growth in visitor numbers, accommodation provision and visitor attractions in recent years, notwithstanding the presence of existing and historic mineral and waste-related operations within the area. There doesn't appear to be any substantive evidence to demonstrate that such activities have undermined the overall attractiveness of the Water Park or the economic viability of its tourism sector.

The proposal would not introduce the first industrial or waste-related activity within the area, nor would it fundamentally alter the mixed-use character which has historically accommodated tourism, recreation, mineral extraction and waste management in parallel. The planning system does not require all perceived impacts on tourism to be avoided, but rather that impacts are kept to an acceptable level and do not give rise to demonstrable and significant harm.

Cotswolds Water Park Policy Context

While the application site lies within the wider Cotswolds Water Park, Core Policy 54 of the Wiltshire Core Strategy is directed specifically towards proposals for outdoor or water-based sports, leisure and recreation development, rather than serving as a blanket development management policy for all forms of development within the Park. Nonetheless, the policy provides important contextual guidance, recognising both the environmental sensitivities of the area and the long-established presence of mineral extraction and other operational land uses which have shaped its evolving character.

Core Policies 39 and 40 support the growth of tourism and visitor accommodation in appropriate locations, but do not seek to insulate such uses from all other forms of development or change. The policy framework instead requires that impacts are assessed proportionately, and that only harm of a demonstrable and unacceptable nature should weigh decisively against a proposal.

In this case, it is accepted that the proposed AD facility would give rise to some localised impacts that may be perceived by certain visitors and tourism operators, including changes to landscape character, additional HGV movements and effects on amenity. These impacts attract weight in the planning balance. However, when assessed against the proposed mitigation, the established mixed-use character of the Cotswolds Water Park, the historic presence of industrial activities, and the continued resilience of the local tourism economy, the degree of harm identified does not reach a level which would, in itself, justify refusal of the application.

Conclusion

Taking all of the above into account, it is concluded that the proposed development would give rise to some localised harm to the amenity, character and perception of the area for certain visitors, particularly in the immediate vicinity of the site. This includes the introduction of industrial built form within a tourism landscape, additional HGV movements, and the potential for adverse effects on tranquillity experienced by recreational users.

This harm is, however:

- adequately mitigated through the proposed design, layout and operational controls;
- limited in its spatial extent and primarily affecting receptors in close proximity to the site;
- moderated over time through landscape planting and screening;
- temporary in nature with a 25-year life permission, and
- not of a scale or nature which would materially undermine the overall tourism function, attractiveness or economic performance of the wider Cotswold Water Park.

Notwithstanding this, the identified effects on tourism and recreation are recognised as a minor adverse planning impact and are afforded limited weight in the overall planning balance.

Accordingly, while tourism impacts weigh against the proposal, they do not, either individually or cumulatively, amount to a level of harm that would justify refusal of the application when assessed against the development plan and national planning policy.

6.14 Other Issues

A number of additional matters have been raised through third-party representations which are not addressed in detail elsewhere in this report.

Concerns have been expressed regarding perceived risks to human health, particularly in relation to nearby schools and children. These concerns are acknowledged; however, health impacts are a material planning consideration where they are evidenced through technical assessment and the advice of statutory consultees. In this case, matters relating to air quality, odour, noise and emissions have been assessed through the Environmental Statement and Addendum and reviewed by the Environment Agency and the Council's Public Protection team, neither of whom raise an objection subject to appropriate controls being secured by condition and environmental permitting.

Representations have also raised concerns about emergency planning, accident scenarios and evacuation procedures in the event of a major incident. The likelihood and management of such events fall primarily within the scope of the Environmental Permitting Regulations and health and safety legislation. Nevertheless, accident risk has been considered in planning terms through the Environmental Statement, which concludes that the risk of major incidents is low.

Some objectors have questioned the credibility, geographic origin or coordination of letters of support submitted in favour of the application. The planning system does not attribute weight based on the number, origin or perceived coordination of representations received. Each representation has been considered on its planning merits, with weight afforded to the substance of material planning considerations rather than the volume of support or objection.

Further representations have challenged the applicant's greenhouse gas calculations, including the treatment of feedstock transport, operational emissions, and the methodology applied to captured carbon dioxide. It is also asserted that the benefits of carbon capture, utilisation and storage (CCUS) should not be relied upon unless permanent carbon sequestration can be demonstrated. In support of this position, reference has been made to an Arup review of a comparable anaerobic digestion proposal.

Officers have had regard to these representations. The Council's assessment of carbon benefit relies on the applicant's submitted lifecycle carbon assessment and associated calculation workbook, which present a net comparative assessment of the proposal against conventional fossil fuel alternatives. The carbon benefit figure relied upon is derived from a whole-life accounting methodology which incorporates emissions associated with feedstock transport, on-site operations and other lifecycle stages. Accordingly, it would not be appropriate to isolate particular components of that assessment and treat them as additional standalone harms without re-running the assessment on a consistent methodological basis.

Officers also recognise that the detailed quantification of lifecycle greenhouse gas emissions, including the treatment of captured carbon dioxide and the extent to which any CCUS process results in permanent sequestration, is inherently complex and subject to differing technical methodologies and assumptions. The Arup review referred to by objectors highlights uncertainty regarding the application of CCUS credits where carbon dioxide is utilised rather than permanently stored. However, it does not demonstrate that the development would fail to deliver a net carbon benefit or that it would conflict with the broad policy objectives of supporting renewable and low-carbon energy generation.

The role of the Local Planning Authority is not to undertake a detailed technical verification of competing carbon-accounting methodologies, but to assess whether the proposal would make a meaningful contribution towards the transition to a low-carbon economy having regard to the evidence before it and the relevant planning policy framework. In this regard, significant weight is afforded by the NPPF and Core Policy 41 to renewable and low-carbon energy development.

For the reasons set out elsewhere in this report, officers are satisfied that the uncertainties identified in representations regarding CCUS methodology and lifecycle greenhouse gas accounting do not undermine the overall conclusions of the submitted assessment.

Having regard to the evidence before the Council, officers remain satisfied that the proposal would make a material contribution to renewable energy generation, carbon reduction and energy security. The concerns raised do not alter the weight afforded to these benefits or the overall planning balance.

Representations have raised concerns that the proposal does not meet the criteria of Core Policy 35 of the Wiltshire Core Strategy. Core Policy 35 is primarily concerned with the protection of existing B-class employment land and buildings from loss to non-employment uses.

The proposed anaerobic digestion facility does not fall within a traditional B-class employment use, and is more appropriately considered as energy and waste infrastructure development, assessed against Core Policy 42, the Waste Development Control Policies DPD and other relevant development plan policies.

Nevertheless, officers have had regard to the objectives of Core Policy 35 in considering the implications of the proposal for the local economy. While the criteria of Core Policy 35 are not directly applicable in this case, the proposal would deliver economic benefits, including job creation, support for the agricultural sector and the rural economy, and contribution to energy security. These benefits are material considerations and have been weighed accordingly in the overall planning balance.

On this basis, any limited conflict with Core Policy 35 is afforded reduced weight in the overall planning balance, having regard to the nature of the proposal and the benefits it would deliver identified elsewhere in this report.”

A range of matters raised through consultation, including impacts on property values, general anxiety about the proposal, perceived fairness of energy distribution, and the commercial interests of individual tourism operators, are not material planning considerations and cannot be taken into account in determining the application.

Accordingly, all representations received have been carefully considered. The material planning issues raised are addressed within the relevant sections of this report, where they have been taken into account in the assessment and planning balance. The matters identified above do not give rise to additional material considerations that would alter the conclusions reached.

6.15 Pre-commencement Condition Agreement

This recommendation includes pre-commencement planning condition(s) relating to construction and ecological management, landscape and ecological management, construction method, a low emission travel plan, archaeological investigations, surface water drainage and access details. In accordance with Section 100ZA of the Town and Country Planning Act 1990 and the Town and Country Planning (Pre-commencement Conditions) Regulations 2018, the Local Planning Authority formally notified the applicant/agent of the proposed condition(s) and sought their agreement. Written confirmation of agreement was received from the applicant’s agent on 09/04/26.

6.16 S106 Heads of Terms

Wiltshire Council’s Planning Obligations Supplementary Planning Document (SPD), when read alongside Core Policy 3 (Infrastructure Requirements) of the Wiltshire Core Strategy and

the adopted CIL Charging Schedule, sets out the circumstances in which planning obligations will be required to make development acceptable in planning terms.

Regulation 122 of the Community Infrastructure Levy (CIL) Regulations 2010 (as amended) and paragraph 58 of the NPPF confirm that any planning obligation must meet all three statutory tests:

1. Necessary to make the development acceptable in planning terms;
2. Directly related to the development; and
3. Fairly and reasonably related in scale and kind.

For rural sites, the SPD identifies ecological mitigation as a form of site-specific infrastructure that can be appropriately secured through a planning obligation where on-site mitigation alone cannot address identified impacts.

The Waste Development Control Policies DPD also emphasise (notably in WDC1 and WDC2) the need for development to avoid or mitigate environmental impacts, including those on biodiversity interests, where required.

The Council's Ecology Team have advised that skylark mitigation is required in order to avoid significant adverse effects on this priority farmland bird species. The mitigation land identified by the applicant lies outside the red line but within the applicant's wider blue line landholding. Because the mitigation is off-site in planning terms, it cannot lawfully be secured solely by condition.

A planning condition cannot lawfully require works on land outside the red-line application site where that land does not form part of the planning unit. Although the land falls within the blue line, it still lies outside the red line planning unit, and a condition would therefore fail the tests of precision, enforceability and necessity. This position is consistent with established case law and the Council's SPD.

Accordingly, a Unilateral Undertaking is required to secure:

- delivery of skylark plots / habitat enhancement in the identified field(s);
- timing and phasing of implementation;
- long-term management and monitoring; and
- access rights for the Council to enforce the obligation if required.

The Ecology Team have confirmed that without secured skylark mitigation, the proposal would result in an unacceptable adverse ecological impact. As a result, without the obligation:

- the development would fail to comply with Core Policy 50,
- would not meet the NPPF biodiversity requirements, and
- would lead to an ecology-based reason for refusal.

The S106 obligation therefore meets all three CIL Regulation 122 tests:

- Necessary – essential to make the development acceptable;
- Directly related – the impact arises solely from the development on skylark territories;

- Fairly and reasonably related in scale and kind – the extent and location of mitigation is proportionate to the scale of the impact.

No other contributions have been identified as necessary by consultees, and there are no additional infrastructure requirements that fall outside the scope of conditions.

Community Infrastructure Levy

The Community Infrastructure Levy (CIL) is a charge that local authorities in England and Wales can put on new development in their area to raise funds to help deliver the infrastructure necessary to support development. This development does not represent chargeable development under the Community Infrastructure Levy Regulations 2010 (as amended) and Wiltshire Council's CIL Charging Schedule.

Having had regard to the consultation responses and the submitted evidence, and exercising independent planning judgement, officers are satisfied that the impacts of the development have been appropriately assessed and, where necessary, can be satisfactorily mitigated and controlled through the recommended planning conditions and planning obligations.

6.17 Assessment conclusion

Having had regard to the consultation responses and the submitted evidence, and exercising independent planning judgement, officers are satisfied that the impacts of the development have been appropriately assessed and, where necessary, can be satisfactorily mitigated and controlled through the recommended planning conditions and planning obligations.

7 PLANNING BALANCE

The assessment above concludes that, subject to planning conditions and the completion of a planning obligation, the proposal is acceptable in respect of highways, residential amenity, ecology, flood risk, heritage, pollution control and agricultural land policy, with no unacceptable residual harm identified in these respects. The Council's Senior Landscape Officer maintains an objection on landscape grounds, and Gloucestershire County Council Highways has maintained a holding objection on cross-boundary transport evidence; these matters are addressed in the relevant sections and weighed in the planning balance.

This application has been assessed in accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004, which requires that planning decisions be made in accordance with the development plan unless material considerations indicate otherwise.

The policies of the Wiltshire Core Strategy (2015) are considered to be up to date for the purposes of paragraph 11 of the NPPF. The proposal has therefore been assessed against the development plan as a whole, with the National Planning Policy Framework, Planning Practice Guidance, and other material considerations, including the Environmental Statement, taken into account in reaching the overall planning balance.

This section therefore brings together the assessment above in order to determine whether, when read as a whole, the proposal accords with the development plan, or whether other material considerations justify approval.

Benefits of the Proposal

Economic Growth and Employment

The proposal would generate approximately 100 FTE jobs during the construction phase, around 15 FTE operational jobs, and an estimated 35 indirect and supply-chain roles. This would support the green energy sector and contribute to local and regional economic activity. This aligns with NPPF paragraphs 85–87, which support sustainable economic growth and productivity.

- **Benefit:** Creation of new employment opportunities and economic investment in the local area.
- **Weight:** Significant weight

Renewable Energy Generation, Decarbonisation and Associated Improvements to Energy Security

The development would generate approximately 10 million m³ of renewable, low-carbon biomethane annually, sufficient to meet the gas demand of around 9,300 homes. It would deliver substantial carbon savings of approximately 29,801 tCO₂e per year, making a meaningful contribution to decarbonisation, climate resilience and national energy security. Paragraph 168 of the NPPF states that decision makers should give significant weight to the benefits of renewable and low-carbon energy development. This carbon benefit figure derives from the submitted lifecycle carbon assessment, which presents a full ‘cradle-to-grave’ comparison of the development against standard UK grid gas and includes emissions associated with the operational phase (including on-site energy demand) and associated transport, together with the methodology’s treatment of captured CO₂ through utilisation/replacement rather than geological storage. It is therefore a net lifecycle figure, rather than a point-of-combustion estimate.

- **Benefit:** Decarbonisation, renewable energy generation and energy security
- **Weight:** Significant weight.

Support for the Local Farming Economy and Circular Agricultural Practices

Paragraph 88 of the NPPF requires planning decisions to enable the sustainable growth and diversification of agricultural businesses, including through new rural economic development. This places a positive policy expectation on supporting schemes that genuinely strengthen the functioning and resilience of the rural economy. In this case, the development would provide integrated support for the local farming community by recycling 91,000 tonnes per annum (tpa) of agricultural by-products, supplying around 120,000 tpa of natural digestate to improve soil health and crop yields, and offering long-term, stable income streams to farms through feedstock supply agreements. Together, these measures reduce reliance on imported artificial fertilisers, lower farm input costs, and help sustain farm businesses at a time of structural change and declining livestock numbers.

- **Benefit:** Support for the local farming economy and circular agricultural practices
- **Weight:** More than moderate weight.

Biodiversity Net Gain

The proposal would deliver a habitat biodiversity net gain of 20.33% and a hedgerow net gain of 72.18%, both substantially exceeding the statutory requirement of 10%.

- **Benefit:** Significant delivery of BNG.
- **Weight:** Moderate weight.

Identified Harms

Landscape and Visual Impact

The proposal would result in localised landscape and visual harm arising from (i) introduction of large-scale built form and industrial character into open countryside, (ii) engineered landform change associated with creating level slabs on a sloping hillside, and (iii) effects on close-range receptors including Ashton Road and users of PRoW AKEY4. The Council's Senior Landscape Officer concludes that these harms are significant adverse and unacceptable in localised terms and identifies particular disagreement with the LVIA's treatment of local value and the assessment of Year 15 effects from AKEY4, as well as the certainty/feasibility of restoration back to baseline landform. These points are afforded careful weight in the planning balance.

However, officers' judgement is that the harm must be considered in its proper policy and landscape context. The site is not within a nationally designated landscape; effects are not widespread; and adopted WCS policy recognises both the evolving character of the Cotswold Water Park landscape (shaped by long-running mineral extraction and continuing to change) and that landscape performs multiple functions including places to "live, work, relax and recreate." Further, WCS Core Policy 42 supports renewable energy schemes subject to satisfactory resolution of site constraints (including landscape), and national guidance recognises the planning system's role in enabling renewable energy infrastructure where local environmental impacts are acceptable.

In this case the proposal has been materially amended to reduce height/massing, incorporates extensive structural planting, and is time-limited with decommissioning and restoration secured by condition to address the Landscape Officer's point on restoration certainty.

In particular, officers consider that the identified landscape impacts are localised, capable of mitigation, and time limited, and therefore do not give rise to an in-principle policy conflict that would preclude the development. On that basis, while the landscape harm is acknowledged and carries moderate weight, it is not considered to amount to a level of harm which would justify refusal when assessed against the development plan and national policy taken as a whole.

- **Harm:** Localised erosion of rural character and visual intrusion
- **Weight:** Moderate weight

Impact on Tourism and the Visitor Economy

The proposal would give rise to some localised adverse effects on tourism and recreational amenity within the immediate vicinity of the site, arising from the introduction of industrial built form within a visitor landscape, additional HGV movements, and potential effects on tranquillity experienced by users of the Cotswold Water Park.

However, these impacts would be limited in extent, primarily affecting receptors close to the site, and would be adequately mitigated through the proposed design, landscape strategy and operational controls. The wider Cotswold Water Park has historically accommodated a range of mineral, industrial and recreational uses and has continued to grow as a visitor destination during this time. Having regard to the assessment of landscape, visual and traffic effects, and the scale and context of the wider Cotswold Water Park, officers do not consider that the proposal would materially undermine the overall attractiveness or economic performance of the area.

- **Harm:** Localised impacts on tourism and recreational amenity
- **Weight:** Limited weight

Neutral Impacts

The following matters are considered policy-compliant and acceptable, and are therefore afforded neutral weight in the planning balance:

- Highway safety and traffic impacts
- Residential amenity
- Ecological impacts
- Drainage and flood risk
- Impact on above and below-ground heritage assets
- Pollution control
- Temporary loss of agricultural land

Taking all matters into account, officers are satisfied that the proposal accords with the development plan when read as a whole, with no material considerations that would indicate a decision should be made otherwise.

Links:

[Wiltshire Core Strategy - Wiltshire Council](#)

[National Planning Policy Framework - GOV.UK](#)

8 CONCLUSION

The identified landscape and visual harm, as set out in the Landscape and Visual Impact section, is afforded moderate weight in the planning balance and has been carefully weighed against the proposal's renewable energy, carbon reduction and rural economic benefits.

Significant weight has been placed on the temporary and reversible nature of the development. This is not an assumption but is secured through enforceable planning conditions requiring decommissioning and full restoration of the site, ensuring that the identified harms do not result in permanent change.

When weighed in the round, the identified landscape harm, while a material planning consideration and afforded moderate weight, is not considered to outweigh the substantial benefits of the proposal in respect of renewable energy generation, climate change mitigation, energy security, agricultural sustainability and biodiversity net gain. Other identified harm (impact on the local tourist economy), have been carefully considered and are similarly assessed as acceptable and outweighed in the planning balance. Subject to the imposition of appropriate planning conditions and completion of the required planning obligation, no material considerations have been identified that would justify refusal of the application.

RECOMMENDATION: That planning permission be GRANTED, subject to delegation to the Head of Development Management for the completion of a Section 106 agreement legal agreement covering the matters set out in this report section 6.15, and subject also to the planning conditions listed below:

TIME LIMIT

The development hereby permitted shall be begun within three years from the date of this permission.

REASON: To comply with the provision of Section 91 of the Town and Country Planning Act 1990 as amended by Section 51 of the Planning and Compulsory Purchase Act 2004

APPROVED PLANS

The development hereby permitted shall be carried out in accordance with the following approved plans and documents:

- AKE-0002: Site Location
- 29419/F101 Rev A: Site Layout for Planning
- 29419/P2/101 Rev P03: Site Layout Plan Sheet 1 of 2
- 29419/P2/101 Rev P03: Site Layout Plan Sheet 2 of 2
- 29419/F106 Rev A: 33m Dia. Dome Fermentor Tank – Plans, Section and Elevations as Proposed
- 29419/F107 Rev A: 45m Dia. Fermentor Tank, 9m High – Plans, Section and Elevations as Proposed
- 29419/P2/104 Rev P01: Attenuation Tank Sections
- 29419/F110 Rev A: Separator Building – Plans as Proposed
- 29419/F111 Rev A: Separator Building – Sections and Elevations as Proposed
- 29419/F104 Rev D: Manure Processing Building – Plans as Proposed
- 29419/F105 Rev C: Manure Processing Building Sections and Elevations as Proposed
- 29419/F108 Rev A: Straw Bunker Building – Plans as Proposed

- 29419/F109 Rev A: Straw Bunker Building – Elevations as Proposed
- 29419/P/2022 Rev A: Silage Clamp Sections and Details
- 29419/P2/106 Rev P01: Drainage Details Sheet 1 Clean Water Details
- 29419/P2/107 Rev P01: Drainage Details Sheet 2
- 29419/P2/108 Rev P01: Drainage Details Sheet 3
- 29419/P2/105 Rev P01: Site Drainage Catchment Plan 1 of 2
- 29419/P2/105 Rev P02: Site Drainage Catchment Plan 2 of 2
- 29419/P2/102 Rev P02: Proposed Levels
- 29419/P/2016 Rev A: Fencing and Gate Details
- 29419/P2/101 Rev P01: Hard/Soft Landscape Plan Sheet 1 of 2
- 29419/P2/101 Rev P02: Hard/Soft Landscape Plan Sheet 2 of 2
- 29419/F112 Rev A: Liquid Storage Tanks – Plans, Section and Elevations as Proposed
- 29419/F102 Rev C: Site Sections as Proposed
- 29419/F103 Rev C: Site Elevations as Proposed
- 29419/P2/150 Rev P02: Site Enclosure Plan Sheet 1 of 2
- 29419/P2/150 Rev P02: Site Enclosure Plan Sheet 2 of 2
- 29419/P/116 Rev B: Welfare Office External Layout
- 29419/P/115 Rev B: Welfare Office Internal Layout
- 29419/P2/109 Rev P01: Proposed Section Through Wetland and Weir
- 29419/F115 Rev B: Elevation Views – Previous and New Planning Scheme
- P24-1022_EN_010_B_A1L: Landscape Strategy Plan

REASON: For the avoidance of doubt and in the interests of proper planning.

DECOMMISSIONING PLAN

Within 25 years of the date on which the anaerobic digestion facility first becomes operational (being the date on which feedstock is first processed on site), or if the development ceases operation for a continuous period of 12 months, whichever is the sooner, the development shall be decommissioned and the land returned to its former use (agricultural). All structures, plant and equipment shall be dismantled and any hard surfaced areas broken up. All materials from these operations shall be removed from the site. Prior to any works associated with this condition commencing, a scheme setting out the full extent of the proposed decommissioning and restoration works shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall be prepared in accordance with the principles and parameters set out in the *Decommissioning Framework – Ashton Keynes* (Sol Environment, Project No. SOL_26_P066_ACO, dated 7 May 2026, authored by Sophie Rainey), unless otherwise agreed in writing by the Local Planning Authority.

The scheme shall include details of the retention of any planting, vegetation and water features; the proposed final ground levels; any seeding to be undertaken; and a timetable for the completion of all works. The scheme shall demonstrate the reinstatement of landform and soils to pre-development levels (or as close as practicable), informed by the approved existing and proposed levels plans. The decommissioning works shall thereafter be undertaken in accordance with the approved details.

REASON: To secure the temporary and reversible nature of the development, ensure restoration of landform and agricultural land, and protect landscape character, visual amenity and the wider Cotswold Water Park setting.

SUBMISSION OF A CEMP

No development shall commence until a Construction Environmental Management Plan (CEMP) has been submitted to and approved in writing by the Local Planning Authority.

The CEMP shall relate solely to the management of environmental impacts during the construction phase and shall include the following:

- a) A description of the development, construction programme and site layout during construction;
- b) Details of site management responsibilities and contact details, including a named site manager and a community liaison contact;
- c) Measures to control construction noise, vibration, dust, mud and other emissions affecting residential amenity;
- d) Measures for the prevention of pollution to land, groundwater and surface waters, including fuel storage, plant refuelling, spill response and waste management;
- e) Measures for managing surface water during construction to prevent flooding and pollution (excluding permanent drainage design);
- f) Ecological protection, avoidance and mitigation measures to be implemented during construction, including protection of designated sites, buffer zones, retained habitats and trees, timing of works, and the role of any Ecological Clerk of Works;
- g) Biosecurity measures to prevent the introduction or spread of invasive species;
- h) Construction working hours, which shall be limited to 0800–1800 Monday to Friday, 0800–1300 Saturdays, with no working on Sundays or Bank Holidays;
- i) A commitment that no burning of materials shall take place on site.

The development shall thereafter be carried out fully in accordance with the approved CEMP for the duration of the construction phase.

REASON: To minimise detrimental effects to the neighbouring amenities, the amenities of the area in general, detriment to the natural environment through the risks of pollution during the construction phase.

LOW EMISSION TRAVEL PLAN

No development shall commence on site until a Low Emission Travel Plan has been submitted to and approved in writing by the Local Planning Authority.

REASON: Core policy 57, Ensuring high design and place shaping such that appropriate levels of amenity are achievable.

ARCHAEOLOGICAL INVESTIGATION

No development shall commence within the area indicated by application PL/2023/03359 until:

- a) A written programme of archaeological investigation, which should include on-site work and off-site work such as the analysis, publishing and archiving of the results, has been submitted to and approved by the Local Planning Authority; and
- b) The approved programme of archaeological work has been carried out in accordance with the approved details.

REASON: To enable the recording of any matters of archaeological interest.

SURFACE WATER DRAINAGE

No development shall commence until a detailed surface water drainage scheme has been submitted to and approved in writing by the Local Planning Authority. The scheme shall accord with the principles set out in the submitted Flood Risk Assessment and shall address all matters identified in the Lead Local Flood Authority's consultation response to the Local Planning Authority dated 6th November 2025 and all relevant matters identified in Natural England's consultation response to the Local Planning Authority dated 11th March 2026. The scheme shall include, but not be limited to:

- Drawings of the overland exceedance flows of the 1 in 100year plus climate change rainfall event that minimise the risk to people and property.
- Submit calculations which demonstrate that the proposed drainage design provides a sufficient level of water treatment to prevent pollution of the receiving watercourse.
- Provide information on whether the existing drainage ditches onsite will be maintained, utilised, or how they will be impacted post-development as shown in Figure 2-4 in the Flood Risk Assessment.
- Provide a construction management plan which mitigates pollution to groundwater and adjacent watercourses, while mitigating flood risk to people and property.
- Submit clear arrangements for the ownership and ongoing maintenance of the proposed drainage system (including SuDS features)
- Design and delivery of site drainage infrastructure that ensures there are no adverse water quality impacts on the Cotswold Water Park SSSI.

The development shall be carried out in accordance with the approved details prior to occupation and maintained thereafter.

REASON: To ensure the development provides an appropriate surface water drainage strategy that manages flood risk and water quality.

ACCESS DETAILS

Prior to commencement of development full construction details of the proposed access arrangement, in broad compliance with Drawing 29419/P/101 Rev G, shall be submitted to and approved by the Local Planning Authority. The access shall be constructed prior to the construction of any part of the AD facility.

REASON: To ensure a safe and sufficient access is provided in the interests of highway safety.

PROVISION OF VISIBILITY SPLAYS

No development, other than the formation of the access, shall commence on site until visibility splays have been provided between the edge of the carriageway and a line extending from a point 2.4 metres back from the edge of the carriageway, measured along the centre line of the access, to the points on the edge of the carriageway 160metres to the north and south from the centre of the access in accordance with the approved plans. Such splays shall thereafter be permanently maintained free from obstruction to vision above a height of 900mm above the level of the adjacent carriageway.

REASON: In the interests of highway safety.

CONTROL OF HOURS FOR FEEDSTOCK DELIVERY AND EXPORT OF DIGESTATE

Feedstock deliveries to the site and the export of digestate shall only take place between 07:00 and 18:00 hours Monday to Friday and between 07:00 and 13:00 hours on Saturdays, with no such movements on Sundays or Bank Holidays.

Notwithstanding the above, for a period not exceeding 8 weeks in any calendar year, feedstock deliveries which are directly associated with the harvesting of crops may take place between 07:00 and 22:00 hours Monday to Sunday.

A written record of the dates during which the extended hours are used shall be kept by the operator and made available to the Local Planning Authority upon request.

REASON: To control the timing of HGV movements associated with the development in order to protect residential amenity and highway safety.

CONTROL OF ROUTING FOR HGV TRAFFIC

All HGV movements relating to the delivery of feedstocks, and export of biomethane, CO₂ and digestate associated with the operation of the Plant shall be routed via the A419 and Spine Road to access Ashton Road only.

REASON: In the interests of highway safety and the efficient operation of the local and strategic highway network, and to ensure that development-related traffic is directed onto appropriate routes to minimise the impacts on amenity of the area, in accordance with the National Planning Policy Framework.

CONTROL ON THE NUMBER OF DAILY MOVEMENTS

No more than 160 Heavy Goods Vehicle (HGV) movements per calendar day (comprising a maximum of 80 arrivals and 80 departures) shall take place to and from the site during a period or periods not exceeding a total of 8 weeks (56 days) in any calendar year. Such higher level of movements shall only occur within the months of June, July, September and October.

At all other times, vehicle movements to and from the site shall not exceed 88 HGV movements per calendar day (comprising a maximum of 44 arrivals and 44 departures).

For the purposes of this condition, an “HGV movement” means a single vehicle entering or leaving the site.

A written log of all HGV movements shall be maintained at the site at all times. The log shall include daily totals of arrivals and departures and shall be retained for a minimum period of 12 months. The log shall be made available to the Local Planning Authority within 5 working days of a written request.

This condition shall be complied with at all times during the operation of the development.

REASON: In the interests of safeguarding the capacity, safety and amenity of the local highway network, particularly during peak agricultural periods, in accordance with the National Planning Policy Framework.

CONTROL OF ROUTING

All deliveries of feedstock and export of digestate hauled by either tractor and trailer or by HGV to/from the Plant shall be in accordance with the approved highway route plan reference ABE/HGV-RP/01. All daily HGV movements for biomethane and CO2 export shall only use the prescribed HGV route.

REASON: To ensure that all development-related traffic is appropriately managed and routed so as to minimise impacts on the local highway network and nearby communities, in the interests of highway safety and amenity, in accordance with the National Planning Policy Framework.

SUBMISSION OF AN OPERATIONAL TRAFFIC MANAGEMENT PLAN

Prior to the first operation of the development hereby permitted, an Operational Traffic Management Plan (OTMP) shall be submitted to and approved in writing by the Local Planning Authority, in consultation with the Local Highway Authority and National Highways. The development shall not be brought into use until the approved OTMP has been implemented. Thereafter, the development shall be operated in accordance with the approved OTMP.

The OTMP shall include:

- i. Details of site access arrangements and on-site traffic management measures;
- ii. A plan identifying the approved routes to and from the site for HGVs, which shall utilise the A419 and B4696 Spine Road as the primary route corridor, together with measures to encourage compliance with these routes and to minimise the use of alternative routes, including the A419 Water Eaton Lane / Seven Bridges junction;
- iii. A plan identifying intended routes for tractor-trailers and other agricultural vehicles associated with the development, designed to reduce traffic through surrounding settlements and residential areas;
- iv. Measures for monitoring vehicle movements and compliance with the approved routing plans, including procedures for reviewing and addressing instances of non-compliance;

- v. Measures for the scheduling and management of vehicle movements to avoid peak traffic periods where practicable;
- vi. A definition of “local tractor and trailer movements” for the purpose of the OTMP.

A record of all feedstock deliveries and export of biomethane, CO₂ and digestate shall be maintained and retained for a period of not less than 12 months. The record shall include the origin and destination of each vehicle movement and shall be made available to the Local Planning Authority within 5 working days of a written request.

REASON: In the interests of the safe and efficient operation of both the local and strategic highway network, with particular regard to the A419 Strategic Road Network, in accordance with the National Planning Policy Framework and DfT Circular 01/2022.

CONSTRUCTION METHOD STATEMENT

No development shall commence on site (including any demolition or site clearance works) until a Construction Method Plan (CMP) has been submitted to and approved in writing by the Local Planning Authority.

The CMP shall relate solely to construction traffic and site access arrangements and shall include:

- a) A Construction Traffic Management Plan, including temporary signage;
- b) An HGV routing plan to and from the site;
- c) Details of the number, size and frequency (daily and weekly) of construction and delivery vehicles;
- d) Details of staff vehicle movements and on-site parking arrangements during construction;
- e) Measures to mitigate the impact of construction traffic on the local highway network;
- f) Arrangements for keeping vehicle movement logs and making them available to the Local Planning Authority upon request;
- g) A pre-construction highway condition survey and post-construction survey of the affected highway sections, in accordance with the requirements of the Highway Authority.

The approved CMP shall be adhered to for the duration of the construction period unless otherwise agreed in writing by the Local Planning Authority.

REASON: To minimise detrimental effects to highway safety, during the construction phase.

PARKING AND TURNING

No part of the development hereby permitted shall be first brought into use until the access, turning area and parking spaces have been completed in accordance with the details shown on the approved plans. The areas shall be maintained for those purposes at all times thereafter.

REASON: In the interests of highway safety.

LANDSCAPE AND ECOLOGY MANAGEMENT PLAN (LEMP)

Prior to the commencement of development, a Landscape and Ecology Management Plan (LEMP) shall be submitted to and approved in writing by the Local Planning Authority.

The LEMP shall set out the ecological mitigation, compensation and enhancement measures for the development and shall include:

1. Long-term landscape and ecological objectives for the site;
2. Details of habitats to be retained, created and managed, together with management prescriptions and maintenance schedules for a minimum period of 30 years from the commencement of development;
3. A monitoring programme, including measurable performance indicators and target habitat conditions;
4. A mechanism for review and adaptive management where monitoring demonstrates that objectives are not being met; and
5. Details of the party or body responsible for implementation and ongoing management of the LEMP.

The approved LEMP shall be implemented in full in accordance with the approved details.

REASON: To ensure the long-term management of landscape and ecological features retained and created by the development, for the benefit of visual amenity and biodiversity for the lifetime of the scheme.

LANDSCAPE IMPLEMENTATION

All soft landscaping comprised in the approved details of landscaping shall be carried out in the first planting and seeding season following the first operational use of the development or the completion of the development whichever is the sooner; All shrubs, trees and hedge planting shall be maintained free from weeds and shall be protected from damage by vermin and stock. Any trees or plants which, within a period of five years, die, are removed, or become seriously damaged or diseased shall be replaced in the next planting season with others of a similar size and species, unless otherwise agreed in writing by the local planning authority. All hard landscaping shall also be carried out in accordance with the approved details prior to the first use of any part of the development or in accordance with a programme to be agreed in writing with the Local Planning Authority.

REASON: To ensure a satisfactory landscaped setting for the development and the protection of existing important landscape features.

MEASURES TO PROTECT SSSI IN THE EVENT OF A FIRE, EXPLOSION, OR OTHER ENVIRONMENTAL INCIDENT ON SITE

The development shall be carried out in accordance with the measures as set out in the Acorn Bioenergy letter, *Response to Natural England's Information Request – 23 May 2025*, to

ensure that no water quality impacts arise in the event of a fire, explosion, or other environmental incident on site.

REASON: To protect SSSI in the event of a fire, explosion, or other environmental incident on site.

TREE PROTECTION

No demolition, site clearance or development shall commence on site, and; no equipment, machinery or materials shall be brought on to site for the purpose of development, until the Tree Protection Measures have been put in place as set out in the Arboricultural Development Statement by SLR Consulting Ltd and dated February 2023.

The protective fencing shall be erected in accordance with the approved details. The protective fencing shall remain in place for the entire development phase and until all equipment, machinery and surplus materials have been removed from the site. Such fencing shall not be removed or breached during construction operations.

No retained tree/s shall be cut down, uprooted or destroyed, nor shall any retained tree/s be topped or lopped other than in accordance with the approved plans and particulars. Any topping or lopping approval shall be carried out in accordance British Standard 3998: 2010 "Tree Work – Recommendations" (or any subsequent revision or replacement thereof) or arboricultural techniques where it can be demonstrated to be in the interest of good arboricultural practice.

If any retained tree is removed, uprooted, destroyed or dies, another tree shall be planted at the same place, at a size and species and planted at such time, that must be agreed in writing with the Local Planning Authority.

No fires shall be lit within 15 metres of the furthest extent of the canopy of any retained trees or hedgerows or adjoining land and no concrete, oil, cement, bitumen or other chemicals shall be mixed or stored within 10 metres of the trunk of any tree or group of trees to be retained on the site or adjoining land.

[In this condition "retained tree" means an existing tree which is to be retained in accordance with the approved plans and particulars; and paragraphs above shall have effect until the expiration of ten years from the first occupation or the completion of the development, whichever is the later].

REASON: The application contained insufficient information to enable this matter to be considered prior to granting planning permission and the matter is required to be agreed with the Local Planning Authority before development commences in order that the development is undertaken in an acceptable manner, to enable the Local Planning Authority to ensure the retention of trees on the site in the interests of visual amenity.

FEEDSTOCK RESTRICTION (AGRICULTURAL AD ONLY)

The anaerobic digestion facility hereby approved shall operate using agricultural feedstocks

including agricultural wastes (including livestock and poultry manures and slurries) and residues (including straw) and crops suitable for the purpose of anaerobic digestion.

No feedstock classified as non-agricultural waste, including but not limited to food waste or catering waste, shall be imported to or processed at the site at any time.

REASON: To ensure the development is operated as an agricultural anaerobic digestion facility as assessed, to justify its countryside location, and to protect the amenities of nearby residential properties, in accordance with the development plan and national planning policy.

NOISE MANAGEMENT

The development hereby permitted shall be carried out in full accordance with the submitted Noise Assessment (dated March 2023, SLR), including the incorporation of all embedded mitigation measures, such as proprietary acoustic attenuation and CHP stack silencers, prior to the commencement of the relevant operations. The approved mitigation measures shall thereafter be retained and maintained for the lifetime of the development.

The rating level of noise from the development, as assessed in accordance with BS 4142:2014+A1:2019, shall not exceed that predicted in the submitted Noise Assessment at the nearest noise-sensitive receptors.

REASON: To ensure the mitigation measures are implemented and to ensure that noise from the development does not give rise to unacceptable impacts on residential amenity, in accordance with the approved assessment.

EXTERNAL LIGHTING

Prior to the installation of any external lighting, a detailed external lighting scheme shall be submitted to and approved in writing by the Local Planning Authority. Works shall subsequently proceed in accordance with any such approved details, with the approved lighting strategy maintained for the lifetime of the development.

The plans will be in accordance with the appropriate Environmental Zone standards set out by the Institution of Lighting Professionals (ILP) Guidance Notes on the Avoidance of Obtrusive Light (GN 01/2021) and Guidance note GN08/23 "Bats and artificial lighting at night", issued by the Bat Conservation Trust and Institution of Lighting Professionals.

REASON: To prevent disturbance to protected species and to avoid unnecessary light spill above and outside of the development site.

POLLUTION PREVENTION AND CONTAINMENT

The development hereby approved shall be carried out and operated in full accordance with the pollution prevention, containment and water management measures set out in Chapter 3 (Project Description) and Chapter 6 (Hydrology and Hydrogeology) of the submitted Environmental Statement, including the use of bunded containment, impermeable surfacing,

sealed drainage systems, lined and covered digestate storage lagoons, and separation of clean and contaminated water systems.

No part of the development shall be brought into operation until all approved containment and drainage infrastructure has been installed and made fully operational.

REASON: To prevent pollution of the water environment, in the interests of environmental protection.

UNEXPECTED CONTAMINATION

In the event of unexpected contamination being identified, all development on the site shall cease until such time as an investigation has been carried out and a written report submitted to and approved by the Local Planning Authority, any remedial works recommended in that report have been undertaken and written confirmation has been provided to the Local Planning Authority that such works have been carried out. Construction shall not recommence until the written agreement of the Local Planning Authority has been given following its receipt of verification that the approved remediation measures have been carried out.

REASON: To ensure that any unexpected contamination is appropriately managed in the interests of human health and the environment.

INFORMATIVES TO APPLICANT

Highways

The applicant should note that the upgrading of the access will require the approval of the Highway Authority. The applicant should make early contact with the Vehicle Access Team to establish if the construction can be completed under a S184 licence. Contact vehicleaccess@wiltshire.gov.uk and/or 01225 713352 or visit their website at <http://wiltshire.gov.uk/highways-streets>

Planned mitigation measures may typically include the carrying out of an initial dilapidation survey of the existing road network, followed by planned and frequent inspections and commitment to address site created degradations.

The application involves an extension to the existing/creation of a new vehicle access/dropped kerb. The consent hereby granted shall not be construed as authority to carry out works on the highway. The applicant is advised that a licence will be required from Wiltshire's Highway Authority before any works are carried out on any footway, footpath, carriageway, verge or other land forming part of the highway. Please contact our Vehicle Crossing Team on vehicleaccess@wiltshire.gov.uk and/or 01225 713352 or visit their website at <http://wiltshire.gov.uk/highways-streets> to make an application.

Environment Agency

The following issues will be considered by the Environment Agency as part of the Environmental Permitting process:

- whether the proposed development is located within Source Protection Zone 2 and assess any potential risk to groundwater.
- whether the proposed development is located within 250m of receptors that are sensitive to nuisance odours and assess whether odours can be adequately managed through the use of a closed system and/or appropriate ventilation.
- whether the proposed facility is located close to receptors (workplaces or homes) of a conservation site and consider whether emissions of sulphur dioxide can be controlled to acceptable levels through appropriate mitigation measures.
- whether the proposed facility will store and treat liquid wastes within 10m of a watercourse and consider whether surface run-off can be satisfactorily managed to avoid contamination of the watercourse.

In order to assess the risks identified above, as part of the permitting process the Environment Agency will require:

- Hydrogeological risk assessment
- Dispersion modelling of emissions and impacts

To reduce the risks to people and the environment and obtain a permit:

- the design and/or layout of the buildings may need to change in order to accommodate closed systems to store and treat waste material for the control of odour.
- the design and/or layout of the buildings may need to change in order to accommodate an appropriate location and height for the major emission point(s).
- the design and/or layout of the buildings may need to change in order to accommodate appropriate infrastructure to control surface run-off.
- the design may need to include abatement technology to reduce the impact of the development beyond Best Available Techniques (BAT).

Safeguards should be implemented during the construction phase to minimise the risks of pollution from the development. Such safeguards should cover:

- the use of plant and machinery
- wheel washing and vehicle wash-down
- oils/chemicals and materials
- the use and routing of heavy plant and vehicles
- the location and form of work and storage areas and compounds
- the control and removal of spoil and wastes.

Legal Agreement

This permission shall be read in conjunction with the signed legal agreement dated the ***
***** 2026.

APPLICATION FOR FULL PLANNING PERMISSION OFFICER COMMITTEE REPORT

Date of Meeting	21 st April 2026
Application Number	PL/2023/03359
Site Address	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
Applicant	Mr Charlie Lywood
Town/Parish Council	Ashton Keynes CP
Electoral Division	Minety
Type of application	Full Planning
Case Officer	Ruaridh O'Donoghue
Reason for the Application being reported to Planning Committee	Called in due to scale, visual impact, relationship with adjoining properties, design and environmental / highways impact.

RECOMMENDATION: That planning permission be GRANTED, subject to delegation to the Head of Development Management for the completion of a Section 106 agreement legal agreement (or Unilateral Undertaking) covering the matters set out in this report section/paragraphs 6.15, and subject also to the planning conditions.

EXECUTIVE SUMMARY

Section 38(6) of the Planning and Compulsory Purchase Act 2004 and S70(2) of the Town and Country Planning Act 1990 require that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise.

This application seeks full planning permission for an anaerobic digestion facility and associated infrastructure on agricultural land west of Ashton Road, Ashton Keynes. The site lies in open countryside within the wider Cotswold Water Park landscape but outside any statutory landscape designation.

The principal issues are the principle of development in the countryside; landscape and visual impact; traffic and highway safety; ecology and biodiversity; amenity (including noise, odour and air quality); flood risk and drainage; and the relationship with waste and environmental permitting regimes.

Officers conclude that, subject to conditions and a legal obligation securing off-site ecological mitigation, the identified harms are limited and can be acceptably mitigated. Significant weight is afforded to the renewable energy, carbon reduction and rural economic benefits of the

proposal, which are considered to outweigh the residual harms. The proposal is therefore recommended for approval in accordance with the development plan and the NPPF.

PLANNING OBLIGATIONS AND CONDITIONS

Obligations

An Obligation will be necessary to secure the off-site Skylark mitigation.

Conditions

The application is acceptable, subject to the conditions and informatives included within this report, covering the following matters:

1. Time Limit
2. Approved Plans
3. Temporary Development, Decommissioning & Restoration
4. Construction Management
5. Highway & Transport Matters
6. Drainage, Groundwater & Flood Risk
7. Ecology, Biodiversity & Landscape
8. Amenity Protection
9. Land Quality & Contamination
10. Pollution Prevention & Environmental Control

1. **PROPOSED DEVELOPMENT SITE AND SURROUNDINGS**

Site location

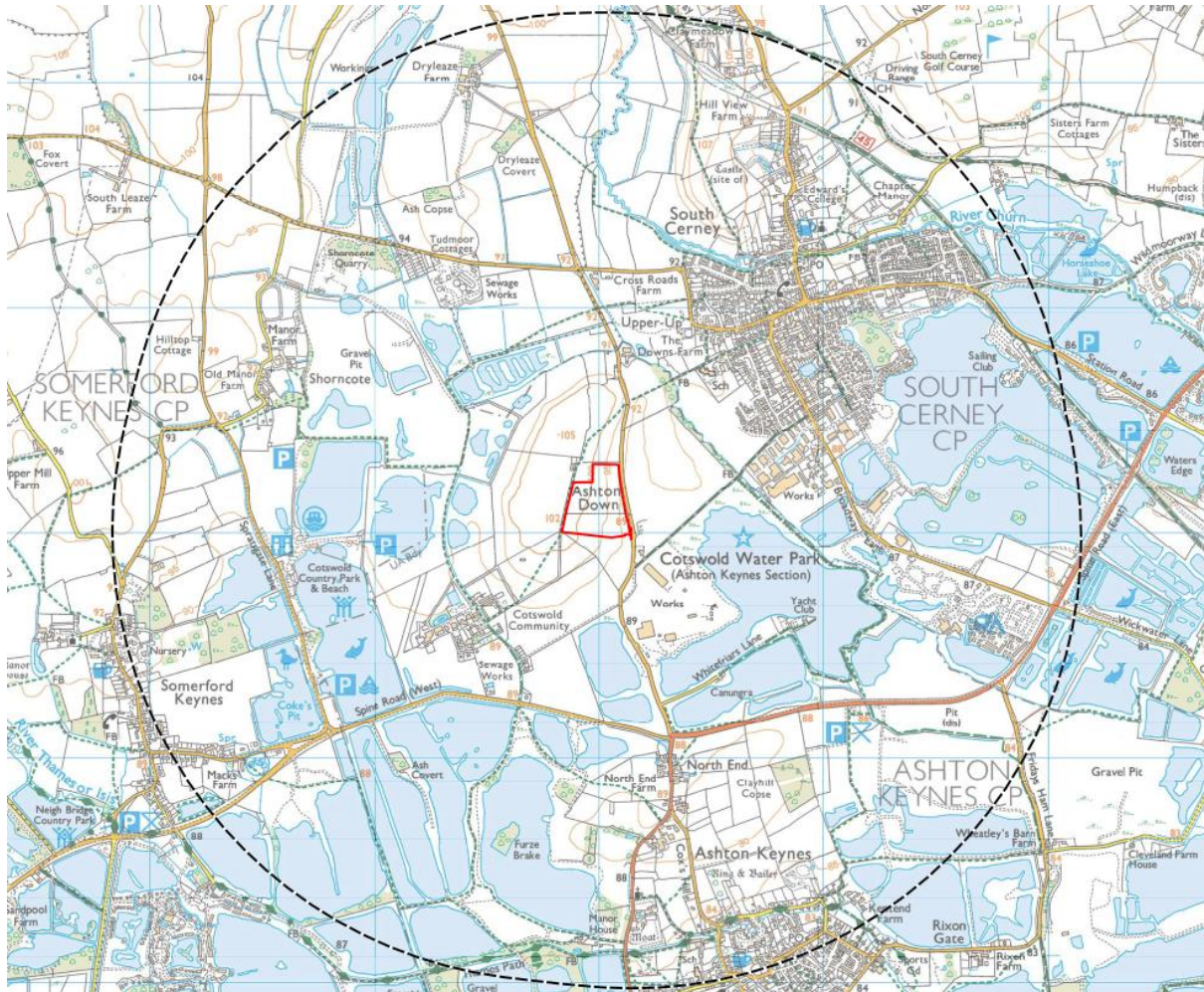


Figure 1 – Site Location Plan

Site Description

The application site comprises approximately 6.99 ha of agricultural land located immediately west of Ashton Road, around 2 km north of Ashton Keynes and close to the Wiltshire–Gloucestershire border. The land sits within the wider Cotswold Water Park landscape, a large area shaped by historic mineral extraction and now characterised by a mosaic of restored lakes, agricultural land, leisure uses and holiday accommodation. Although the Water Park contains extensive visitor attractions, the application site itself is separated from the nearest lakes and recreational land and does not fall within the SSSI.

The site is currently undeveloped farmland and forms part of a rural landscape influenced by both agriculture and mineral restoration. The immediate surroundings include a mixture of land uses: restored and active quarry workings; residential clusters associated with the former Cotswold Community redevelopment approximately 335m to the southwest; a trading estate/business park roughly 526m to the east; and an Aggregate Industries facility around

120 m to the south. This combination means the local context is neither wholly rural nor wholly industrial, but a transitional semi-rural environment (see figure 2 below).



Figure 2 – Aerial Photo of Site Surroundings

Access is taken directly from Ashton Road, which connects to Spine Road East and onward to the A419 dual carriageway, providing high-quality strategic access for HGVs without the need to travel through villages or directly past residential frontages.

The site contains a central ditch and hedgerow running west–east, with further hedgerows along the northern, eastern and much of the western boundaries. The southwest corner is more open and currently used for agricultural access. Levels fall from east to west across the site, from approximately 102.25 m AOD along the eastern boundary to around 89.75 m AOD in the southeast corner. At a wider scale, the site lies on the eastern flank of Ashton Downs, an isolated local hill form that influences the visual context.

Constraints:

- Located in open countryside, outside any defined settlement boundary.
- Not within a designated landscape; the Cotswold National Landscape lies approximately 5 km to the northwest, and the North Wessex Downs National Landscape approximately 17 km to the south.
- The site is within Flood Zone 1, and avoids SSSIs, ancient woodland and heritage assets. The nearest ecological designation is the Cotswold Water Park (Cotswold Lakes) SSSI, the nearest parts of which lie about 300 m away.
- Agricultural Land Classification: Grade 3 (moderate quality).
- No public rights of way cross the site, although several routes exist in the surrounding area.
- The site lies within a Mineral Safeguarding Area: sand and gravel.

Site Photographs



View from Ashton Road at the northeastern end of the site looking in a south westerly direction © Google



View from Ashton Road at the site entrance looking in a westerly direction © Google



View from Ashton Road at the southeastern end of the site looking in a north westerly direction © Google

Proposal

The proposal is for the construction and operation of an anaerobic digestion (AD) facility on approximately 7 ha of agricultural land off Ashton Road. The facility would process around 91,000 tonnes of agricultural feedstock per annum, comprising rotational break crops (rye, maize, grass), straw, farmyard manure, slurry and a small proportion of poultry litter, predominantly sourced from farms within a 10-mile radius (see figure 3 below).

- 16.5 m overall height
- Silage Clamps (x3)
 - Clamps 1 & 2: 101 m x 35 m
 - Clamp 3: 124 m x 35 m
 - All 3.5 m high
- Straw Processing Building (x1)
 - 43 m x 23 m
 - 9.2 m ridge height
- Chicken Manure Reception Building (x1)
 - 26 m x 19.5 m
 - 8.1 m eaves / 9.2 m ridge
 - 10.2 m exhaust stack
- Covered Digestate Lagoons (x2)
 - 8,000 m³ each
 - HDPE-lined with floating covers and abatement vents
- CO₂ Capture Unit
 - 10 m x 16 m x 4.75 m
 - Two associated storage tanks (13 m x 3 m)
- Biogas Upgrade Unit
 - 26 m x 9 m footprint
 - 7.5 m vent
- CHP Units (x2)
 - 13 m x 3 m x 3 m
 - 9 m stacks
- Compressors (x2)
 - 6.5 m x 3 m x 3 m
 - 9 m stacks
- Rainwater lagoon (2,000 m³)
- 70 m internal access road, weighbridge and office
- 5 HGV bays and 8 staff/visitor spaces

Since the application was first submitted in 2023, the design has been subject to two major rounds of revision: the 2024 Design Changes and the 2025 Design Refinements. Together, these amendments have significantly reduced the visual massing of the proposal and strengthened both environmental and operational mitigation. The key changes are:

- Lowered site levels to reduce the apparent height and bulk of buildings and tanks.
- Reduction of digesters from five to three, comprising two flat-topped 9 m tanks and one 34 m domed post-digester (16.5 m), substantially reducing vertical massing.
- Reduction in manure reception building height from 13 m to 9.2 m, following discussions with the Council's Landscape Officer.
- Substantial enlargement and thickening of structural landscape planting, with approximately 40% of the site now dedicated to habitat creation and screening.
- New native willow screen added along the site entrance to reduce visibility of the gatehouse and welfare cabins (2025 refinement).
- Creation of an off-site wildflower meadow within the applicant's blue line to maximise biodiversity net gain.

- Updated lighting strategy to meet ILP E2 (rural) standards, including strict light-spill control and no lighting to the access road mouth.
- Enhanced odour controls, including full enclosure of feedstock handling and abated displacement air, with all manure unloading now contained inside the building.

The applicant asserts that these changes reflect a landscape-led design evolution, directly responding to consultee feedback and resulting in a materially less prominent and better-mitigated development (see figure 4 below).

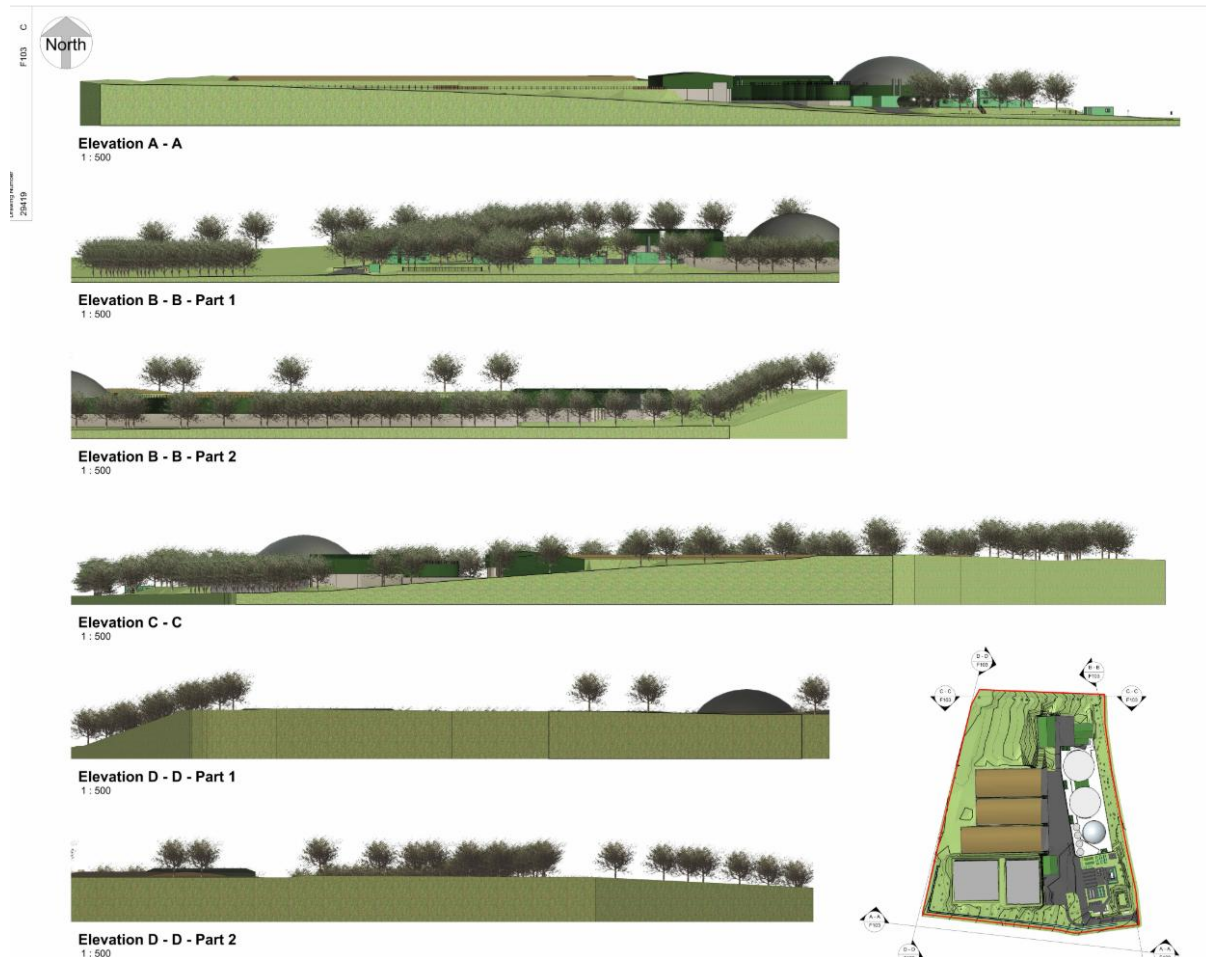


Figure 4 – Site Levels - Cross Sections

Operational details:

- The AD process uses the controlled, oxygen-free decomposition of organic material over a 50-day retention period, generating biogas which is cleaned and upgraded to biomethane.
- Digestate is separated into liquid and solid fractions:
- Liquid digestate is stored in covered, abated lagoons ($2 \times 8,000 \text{ m}^3$) for reuse as fertiliser.
- Solid digestate is stored under cover before export.
- Food-grade CO_2 is captured to 99.9% purity and exported for use in commercial sectors.

- The plant operates 24/7, with typical staffing between 07:00 and 18:00, supplemented by automated SCADA monitoring outside staffed hours.
- Vehicle movements remain consistent with the original assessment: approximately 38–44 HGV/tractor trips per day, rising temporarily during harvest. Biomethane export occurs by tanker every 12 hours.

Locational Rationale

The site selection reflects both operational necessity and planning policy considerations:

- Proximity to feedstock sources and digestate markets within a well-established agricultural catchment ensures short transport distances, reduces emissions, and supports local farm businesses.
- Direct access to the Spine Road East and A419 dual carriageway, without passing through villages or residential streets, provides a safe, strategic route for HGVs.
- No viable option for direct pipeline connection exists locally; the applicant therefore relies on biomethane-fuelled tankers to its Banbury injection hub.
- The 7 ha site is of sufficient size to accommodate AD process infrastructure while still delivering substantial landscape mitigation and biodiversity net gain.
- The site avoids designated landscapes, lies outside the Cotswold National Landscape, and is well separated from the Cotswold Lakes SSSI.
- It sits within a semi-rural area already influenced by modern agriculture, mineral extraction, utilities and industrial land uses, consistent with national guidance that renewable energy development may be appropriately located beyond settlements where landscape impacts are acceptable.

Taken together, the site achieves a functional and policy-aligned location for a facility of this nature, supporting both rural economic diversification and the wider transition to renewable, low-carbon energy.

2. RELEVANT PLANNING HISTORY

There is no relevant planning history pertaining to the site.

3. RELEVANT PLANNING LEGISLATION, POLICIES AND GUIDANCE

National Planning Policy:

- National Planning Policy Framework (NPPF) [National Planning Policy Framework - GOV.UK](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/617353/NPPF-2019.pdf)
- Planning Practice Guidance (PPG) [Planning practice guidance - GOV.UK](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/617353/PPG-2019.pdf)
- National Design Guide [National design guide - GOV.UK](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/617353/NDG-2019.pdf)

Development Plan:

The development plan for Wiltshire comprises the *Wiltshire Core Strategy (WCS)* (adopted January 2015), any made neighbourhood plans, together with the Wiltshire Housing Site

Allocations Plan and the Chippenham Site Allocations Plan. These remain the principal statutory planning document guiding development across the county.

In line with Section 38(6) of the Planning and Compulsory Purchase Act 2004, planning decisions must be made in accordance with the development plan unless material considerations indicate otherwise. Though the development plan is considered as a whole, those parts deemed to be particularly relevant to this application are listed below:

The adopted **Wiltshire Core Strategy (WCS)**, with particular regard to :

- Core Policy 1 Settlement Strategy;
- Core Policy 2 Delivery Strategy;
- Core Policy 3 Infrastructure Requirements;
- Core Policy 13 Spatial Strategy for the Malmesbury Community Area
- Core Policy 41 Sustainable Construction and Low-Carbon Energy;
- Core Policy 42 Standalone Renewable Energy Installations
- Core Policy 50 Biodiversity and Geodiversity;
- Core Policy 51 Landscape
- Core Policy 52 Green Infrastructure
- Core Policy 54 Cotswold Water Park
- Core Policy 55 Air Quality;
- Core Policy 56 Contaminated Land;
- Core Policy 57 Ensuring High Quality Design and Place Shaping;
- Core Policy 58 Ensuring the Conservation of the Historic Environment;
- Core Policy 60 Sustainable Transport;
- Core Policy 61 Transport & Development;
- Core Policy 62 Development Impacts on the Transport Network;
- Core Policy 63 Transport Strategies
- Core Policy 64 Demand Management
- Core Policy 65 Movement of Goods
- Core Policy 66 Strategic Transport Network
- Core Policy 67 Flood Risk;
- Core Policy 68 Water Resources

Appendix D of WCS – Relevant Saved Policies of North Wiltshire Local Plan 2011

- NE18 – Noise and Pollution
- NE14 – Trees, site features and the control of development

Neighbourhood Plan - Ashton Keynes Neighbourhood Plan (Made May 2017)

The Plan's vision seeks to ensure that development within the Parish occurs in harmony with its rural character, landscape setting and environmental sensitivities, particularly given its location within the Cotswold Water Park and the Upper Thames catchment. Key policies include:

- *INP1 – Flood Risk Mitigation*
- *INP2 – Road & Pedestrian Safety*
- *INP4 – Communications Infrastructure (limited relevance but supports improved digital connectivity)*
- *ENP1 – Protection of Biodiversity & Wildlife Sites*
- *ENP2 – Environmental Infrastructure & Accessibility*
- *ENP3 – Landscape Character & Tranquillity*
- *HCP1 – Local Character*
- *ECP1 – Employment Land*
- *ECP2 – Former Minerals Extraction & Manufacturing Sites (contextually relevant for development in the Cotswold Water Park landscape)*
- *ECP3 – Recreation & Tourism (indirect relevance as it concerns the Water Park setting)*

Link to Neighbour Plans:

[Neighbourhood planning - Wiltshire Council](#)
[Latest progress - Wiltshire Council](#)

Wiltshire Waste Core Strategy 2009

Anaerobic digestion (AD) plants can manage a broad range of materials, such as agricultural manure and slurry, sewage sludge and food waste as well as purpose-grown crops (biomass). The proposed Ashton Keynes AD Plant would accept a feedstock off rotation break crops (including silage, rye, maize and grass), straw, and farmyard manures from local farms. No food waste, green waste, catering waste or material from non-agricultural holdings would be imported.

The proposed feedstock for this plant has traditionally been viewed as non-waste materials, with planning applications for such AD developments being considered under WCS Core Policy 42: Standalone renewable energy installations. However, since submission of this application the High Court has ruled that manure can be waste within the Planning Acts. It is therefore considered appropriate to also assess this application against the council's planning policies for managing waste management development. The relevant policies are:

- Policy WDC1: Key Criteria for Ensuring Sustainable Waste Management Development
- Policy WDC2: Managing the Impact of Waste Management
- Policy WDC3: Water Environment
- Policy WDC4: Protection of Recreational Assets
- Policy WDC5: Canals and Railways
- Policy WDC6: Airfield Safeguarded Areas
- Policy WDC7: Conserving Landscape Character
- Policy WDC8: Biodiversity and Geological Interest
- Policy WDC9: Cultural Heritage
- Policy WDC10: Restoration of Waste Management Sites
- Policy WDC11: Sustainable Transportation of Waste
- Policy WDC12: Renewable Energy

- Policy WDC13: Landfill Development

Link to various documents:

[Planning and building control - Wiltshire Council](#)

[Wiltshire Core Strategy - Wiltshire Council](#)

[Saved policies from District Local Plans - Wiltshire Council](#)

[Waste Development Control Policies DPD 2009](#)

Draft Wiltshire Local Plan Policies

- Policy 1: Settlement Strategy
- Policy 2: Delivery Strategy
- Policy 3: Reserve sites and broad locations for growth
- Policy 4: Addressing climate change
- Policy 5: Securing infrastructure provision from new development
- Policies 6-20: Chippenham Area Strategy
- Policies 21- 43: Salisbury Area Strategy
- Policies 44- 51: Swindon Area Strategy
- Policies 52 – 63: Trowbridge Area Strategy
- Policies 64 – 75: Economic, tourism, retail and transport
- Policies 76 – 84: Social, housing, community, public open space and wellbeing
- Policies 85 – 101: Sustainability, ecology, water and landscape, heritage, air quality

Link to current Pre submission draft LP text and policies:

[Overview - Wiltshire Council](#)

[Submission and document library - Wiltshire Council](#)

However, the examination of the emerging Wiltshire Local Plan has been paused and the weight to be afforded to any part of the emerging plan can be no more than very limited. A decision on how to proceed will be made by the Council in May 2026.

Supplementary Planning Documents/Guidance:

- Wiltshire Design Guide (adopted April 2024)
- Air Quality SPD (due to be Adopted in October 2025)

Other Relevant Policies and Documents:

- Wiltshire Local Transport Plan 2011-2026, adopted 2015 - including the Car Parking Strategy and Cycling Strategy, adopted 2015
- A Green & Blue Infrastructure Strategy for Wiltshire: Wiltshire's Natural Environment Plan 2022-2030

Link to documents:

[Wiltshire Design Guide - Wiltshire Council](#)

4. SUMMARY OF CONSULTATION RESPONSES

WC Highways: No objection subject to conditions

WC Conservation: No objection

WC Archaeology: No objection subject to conditions.

WC Public Protection: No objection subject to conditions

WC Landscape: Objection regarding the landscape impact of the proposal.

WC Ecology: No objection

WC Drainage: No objection subject to conditions

WC Arboricultural: No objection subject to conditions

Environment Agency: No objection subject to conditions

Natural England: No objection subject to appropriate mitigation being secured

Ashton Keynes Parish Council – Key Concerns:

- Strong and continued objection despite amendments; core issues remain unaddressed.
- Industrial-scale development inappropriate in rural Cotswold Water Park setting.
- Harm to tourism economy; AD plant incompatible with a visitor-based landscape and risks loss of local jobs.
- Very narrow and dangerous access routes (Ashton Road and B4696 crossroads – noted accident cluster).
- Significant increase in HGV/tractor movements, especially in summer crop-season; cumulative impacts with Steadings (2,350 homes) and Wheatleys Farm Quarry.
- No local benefit: village not on gas grid; residents bear harm but do not receive energy.
- Very close to Ashton Keynes, South Cerney, and 75-home Cotswold Community redevelopment.
- Proximity to and potential impact on SSSI; biodiversity risks, water contamination concerns.
- Air quality and odour concerns, including methane and unpleasant emissions.
- Questions over sourcing of 91,000 tonnes of feedstock and credibility of carbon/traffic assumptions.

- Environmental permit unlikely due to proximity to SSSI and Source Protection Zones.
- Lack of assessment of alternatives and cumulative impacts; failures in EIA content (no EclA, no alternatives, no decommissioning plan).
- Visual harm and landscape impact, including night-time lighting.
- Concerns over groundwater contamination and inadequate SuDS removal in revised drainage design.

South Cerney Parish Council – Key Concerns:

- Maintains strong objection; JBA hydrological technical note supports refusal.
- Applicant fails to recognise unsuitable location; significant landscape harm.
- Serious concerns about proximity to Ann Edwards Primary School and playgroup; risks to children not assessed.
- No proper assessment of emissions (SO_x, NO_x, PM, ammonia, CO₂/CH₄), odour or cumulative air quality effects (including existing Shorncote WwTW odours).
- Risks to nearby SSSI lakes and groundwater; inadequate drainage assessment and dangerous assumptions about ditch discharge.
- No HRA despite proximity to SSSI; failure to assess impacts on North Meadow SAC.
- Road network wholly unsuitable: narrow rural roads, dangerous junctions, high existing HGV loads; omissions in cumulative highways analysis (Gloucestershire roads, quarry, Steadings).
- Failure to consider end-use emissions (post-Supreme Court Finch ruling).
- No comparative assessment of alternative sites; no assessment of cumulative environmental impacts.
- Harm to Cotswold Water Park tourism businesses; no assessment of cyclist safety or recreation impacts.
- Landscape corridor importance understated; adverse visual and tranquillity impacts.
- Lack of Environment Agency permit; no clarity on decommissioning, lifecycle emissions or net-zero compliance.
- Doubts over ability to source feedstock locally; major vehicle emissions undermine carbon-saving claims.
- Risks of methane/biogas leaks; impacts of maize-based feedstock on soil health and food security.

Somerford Keynes Parish Council – Key Concerns:

- Strong objection; amendments do not reduce overall harm.
- Industrial plant inappropriate in rural landscape; 24-hour lighting, noise, flare and visual intrusion.
- Location adjacent to Cotswold Water Park SSSI, Conservation Area, and key recreational lakes (Lake 32, Country Park & Beach).
- Significant HGV/tractor increases (quoted 88 daily movements) posing major safety hazard on narrow rural roads; seasonal traffic peaks will worsen congestion.
- Air pollution concerns from diesel traffic, plant operations, and odours.
- Risk of liquid or gas leakage causing ecological harm; dangers from transporting compressed gases.
- Disturbance to tranquillity, ecology and tourism in a heavily visited leisure area.
- Inadequate consideration of alternative brownfield or industrial sites.

5. **SUMMARY OF REPRESENTATIONS**

In accordance with the requirements of the Town and Country Planning (Development Management Procedure) (England) Order 2015 (as amended), the application was publicised by way of:

- Neighbour notification letters sent to adjoining and nearby properties;
- A site notice displayed near the site;
- An advertisement placed in the local press.

These methods were used to inform interested parties and provide a period of 21 days for comments to be submitted.

Below is a summary of the representations received during the consultation period. Only material planning considerations have been taken into account in the assessment of this application. Non-material issues, such as property values or private legal disputes, cannot be considered in the determination process.

Letters of Objection

A total of 529 comments were received. This figure reflects the cumulative number of representations submitted across more than one round of consultation. As a result, it includes repeat comments from individuals who had previously objected or commented on the proposals. Accordingly, while the overall volume of representations demonstrates a high level of public interest and concern, the figure of 529 does not equate to 529 unique respondents, and the number of individual objectors is lower.

Location and Proximity to Sensitive Receptors

- Site is within approximately 500m of Ann Edwards Primary School, South Cerney Playgroup, and residential areas (Saxon Meadows, King's Water).
- Concerns about safeguarding and health impacts on children due to odour, emissions, and traffic.
- Inappropriate siting within a rural, residential, and tourism-focused area.

Air Quality, Odour and Health

- Anaerobic digestion facilities emit gases (methane, ammonia, hydrogen sulphide) and unpleasant odours.
- Prevailing south-westerly winds likely to carry odours and pollutants toward homes and schools.
- Lack of robust odour management and air quality assessment; potential health risks for vulnerable groups.

Noise and Light Pollution

- Continuous 24/7 operation with CHP engines, compressors, and HGV movements.
- Noise assessment considered flawed; predicted BS4142 exceedances at night.
- Light pollution from security and operational lighting impacting rural tranquillity.

Traffic and Highway Safety

- Estimated up to 160 HGV movements per day plus tractors and tankers.
- Ashton Road and Spine Road (B4696) are narrow, rural routes with accident history and poor visibility.
- Increased risk to pedestrians, cyclists, and holiday traffic; cumulative impact with quarry and housing developments.

Flood Risk and Water Pollution

- Site lies within flood-influenced area; entrance at lowest point relies on sandbags for containment.
- Risk of digestate spills contaminating drainage ditches and interconnected lakes flowing into the River Thames.
- Inadequate Flood Risk Assessment and emergency planning.

Ecological and SSSI Impact

- Site is surrounded on three sides by Cotswold Water Park SSSI (within 300–350m), breaching EA guidance (minimum 500m buffer).
- Located in Groundwater Source Protection Zone 2 and Nitrate Vulnerable Zone.
- Potential harm to rare marl-forming lakes, stonewort species, and protected wildlife habitats.

Landscape and Visual Impact

- Industrial-scale structures (digesters up to 17m high) incompatible with rural character and Cotswold Water Park setting.
- Visual intrusion and urbanisation of countryside contrary to Core Policy 51 and NPPF principles.

Tourism and Economic Impact

- Negative effect on Cotswold Water Park visitor economy; harm to holiday parks, leisure businesses, and local jobs.
- Risk of odour and traffic deterring visitors, undermining tourism-based income.

Policy Non-Compliance

- Conflicts with Wiltshire Core Strategy policies:
 - CP42 (Renewable Energy), CP50 (Biodiversity), CP51 (Landscape), CP55 (Air Quality), CP60–62 (Transport), CP67 (Flood Risk).
- Contravenes NPPF paragraphs 8, 111, 174, 180–185 on sustainable development, biodiversity, and amenity.

Questionable Sustainability and Need

- Overstated carbon savings; reliance on energy crops and long-distance feedstock transport.
- Gas export to Banbury (~100 miles) undermines local benefit claims.
- Minimal local employment (4–5 jobs) versus significant environmental and social harm.

Weight and Credibility of Public Representations

- Allegations that recent “letters of support” are orchestrated, duplicated or cloned, lacking planning substance and originating from outside the local area.

- Concerns that such representations should be given very limited weight, as they do not engage with site-specific impacts or development plan policy considerations.
- Claims that the submission of such material is misleading and undermines the transparency of the planning process.

Failure to Progress Environmental Permitting in Parallel

- Repeated concern that the applicant has not applied for a bespoke Environment Agency permit, despite EA advice that the site is unlikely to be licensable under Standard Rules due to SSSI proximity, groundwater protection zones and nearby watercourses.
- Objections that planning permission should not be granted where deliverability is uncertain, and where the development may not be capable of lawful operation.
- Argument that, without an environmental permit, the scheme would deliver no carbon benefit at all.

Lack of Alternative Site Assessment

- Continued objection that no meaningful alternative site assessment has been undertaken, despite evidence that less constrained locations exist closer to grid injection points and away from sensitive receptors.
- Claims that the extent of agricultural and community support for AD highlights a failure of site selection, rather than justification for this location.

Cross-Boundary and Cumulative Impact Failures

- Objections that Gloucestershire Highways has not been consulted, despite clear cross-boundary traffic impacts affecting Spine Road East and routes within Gloucestershire.
- Failure to assess cumulative impacts alongside The Steadings (Cirencester), Wheatleys Quarry and local housing growth, particularly in transport, air quality and amenity terms.

Criticism of Technical Evidence and Assessments

- Submissions argue that the Noise Assessment, Carbon Assessment and Hydrology evidence have been robustly challenged by third-party experts and remain unaddressed.
- Ongoing objection from the Wiltshire Council Landscape Officer, unchanged despite multiple resubmissions, highlighting unresolved landscape harm and policy conflict.

Emergency Planning and Site Safety

- Concerns regarding the absence of credible emergency planning, particularly in relation to evacuation of Ann Edwards Primary School and Playgroup given their cul-de-sac access.
- Objections that safeguarding and emergency response considerations for children have not been adequately assessed.

Poor Site Design and Pollution Control

- Strong criticism of the site layout, with the main access located at the lowest point of the site, increasing flood and pollution risk.

- Reliance on sandbags as a pollution control measure is criticised as outdated and not representing Best Available Technology.

Carbon Accounting and Net Zero Compliance

- Objections that the applicant has failed to quantify operational CO₂ emissions, including from electricity demand, gas use and flaring.
- Concerns that the proposal could increase Wiltshire's overall carbon footprint, conflicting with net-zero objectives.
- Lack of clarity on grid connections and whether infrastructure would cross the SSSI.

Questioning the Need for the Development

- Objections that agricultural feedstocks proposed for the plant can already be land-spread without digestion, calling into question the need for this facility in this location.
- Concerns regarding reliance on energy crops, PAS110 digestate quality (including emerging concerns around microplastics), and limited local benefit.

Control, Enforcement and Long-Term Management

- Questions raised over how the Council would enforce compliance with operational assumptions (traffic routing, feedstock sourcing, odour control).
- Doubt that commitments made by the applicant can be effectively monitored or enforced over the lifetime of the development.

Procedural and Community Impact Concerns

- Objections regarding the length of the application process (nearly three years) and the prolonged anxiety caused to local residents, schools and businesses.
- Calls for timely determination to avoid further uncertainty.

The most common and strongly expressed concerns relate to:

- Proximity to Ann Edwards Primary School and South Cerney Playgroup, with safeguarding and health risks for children.
- Odour and air quality impacts, particularly under prevailing wind conditions.
- Traffic and highway safety, with fears of severe cumulative impacts on already dangerous rural roads.
- Environmental harm to the Cotswold Water Park SSSI and local biodiversity, alongside flooding and water contamination risks.
- Negative impact on tourism and rural character, undermining the local economy.

Letters of Support

A total of 62 comments were received including 40 signatories of a petition to support local farming. The following comments are noted:

Support for Local Farmers and Rural Economy

- The facility will use organic materials from local farms as feedstock, providing a new income stream for farmers.
- Digestate produced will replace expensive imported synthetic fertilisers, improving soil health and reducing costs.
- Opportunity for farmers to grow energy crops for the plant, aiding diversification.

Contribution to Renewable Energy and Net Zero

- The plant will produce biomethane, supporting the UK's transition to net zero and reducing reliance on fossil fuels.
- Enhances energy security by reducing dependence on foreign gas supplies.
- Captures and reuses CO₂, contributing to carbon reduction and supporting circular economy principles.

Environmental and Biodiversity Benefits

- Design includes measures to increase biodiversity and habitat provision.
- Digestate is nutrient-rich and regulated under PAS110 standards, improving soil quality and reducing chemical fertiliser use.
- AD process kills harmful bacteria and weeds, supporting sustainable farming practices.

Policy Alignment and National Need

- Supports Government targets for renewable energy, waste recycling, and biomethane production (Biomass Strategy 2023).
- Aligns with NPPF objectives for sustainable development and climate change mitigation.
- Recognised by trade bodies (REA and ADBA) as critical for energy security and decarbonisation.

Economic and Community Benefits

- Provides green employment opportunities in rural areas.
- Offers a local route for food waste treatment, reducing landfill and supporting circular economy goals.
- Seen as a positive step for farm diversification and resilience.

Design and Amenity

- Supporters state the buildings are comparable to agricultural barns and not visually intrusive.
- Belief that odour and noise can be effectively managed through best practice and regulatory controls.

Petition

- A petition containing 37 signatures has been submitted in support of the application, reinforcing the view that the proposal will benefit local farmers and contribute to renewable energy goals.

The most common reasons for support are:

- Economic benefits for local farmers through feedstock supply and digestate use.
- Contribution to renewable energy and energy security, helping meet net zero targets.
- Environmental benefits, including waste recycling, soil improvement, and biodiversity gains.
- Alignment with national policy and climate objectives, supported by industry associations.

6. PLANNING CONSIDERATIONS

In accordance with Section 70 (2) of the Town and Country Planning Act 1990, Section 38(6) of the Planning and Compulsory Purchase Act 2004 states:

"If regard is to be had to the development plan for the purposes of any determination to be made under the planning Acts, the determination must be made in accordance with the plan unless material considerations indicate otherwise."

In accordance with this statutory requirement, this application has been assessed against the relevant policies of the Development Plan, including the Wiltshire Core Strategy (2015) and, where applicable, any relevant made, or emerging, Neighbourhood Plans. Consideration has also been given to the policies of the National Planning Policy Framework (NPPF) as a material consideration in the assessment.

Key issues

The main issues that need to be addressed in this case include:

- Whether the proposal constitutes EIA development
- Principle of the development
- Design and visual impact
- Amenity impacts
- Impact on historic environment/landscape, heritage assets
- Landscape impact
- Impact on parking and highway safety, including if there is sufficient parking for the proposed development
- Drainage and Flood risk
- Impacts on protected species or priority habitats
- Land contamination / air quality issues
- Loss of best and most versatile agricultural land
- Any other planning issues
- S106 planning obligations heads of terms

6.1 Environmental Impact Assessment (EIA) Screening and Adequacy

In accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended), the local planning authority has considered whether the proposed development constitutes EIA development.

A formal screening opinion was issued by the local planning authority prior to submission (reference: PL/2022/09477), confirming that the proposal does constitute EIA development under schedule 2 of the EIA Regulations. Although Schedule 2 development normally requires EIA only in limited circumstances, this proposal was considered to be EIA development due to its scale and nature and its close proximity (approximately 180m) to the Cotswold Water Park SSSI, where emissions (including ammonia, NO_x and SO₂) are likely to give rise to

significant effects on a sensitive ecological receptor. In addition, the potential for significant effects on the historic environment (including a Scheduled Monument), air quality, and risks associated with biogas production and storage mean that the development is likely to result in significant environmental effects for the purposes of the EIA Regulations, necessitating an Environmental Statement. In light of this, an Environmental Statement (ES) has been submitted with the application.

The local planning authority has reviewed the ES and supporting documentation and is satisfied that it meets the requirements of Regulation 18 of the EIA Regulations. The Environmental Statement assesses the likely significant environmental effects of the proposed anaerobic digestion facility, including impacts on air quality, ecology (including biodiversity and designated sites), flood risk and drainage, landscape and visual amenity, land quality, transport, and the historic environment. It also considers cumulative effects and identifies mitigation measures to avoid, reduce or mitigate any significant adverse impacts over the lifetime of the development.

The EIA Regulations require consideration of reasonable alternatives where they are relevant to the assessment of likely significant effects. They do not impose a general obligation to undertake a comparative site-selection exercise. In this case, the Environmental Statement explains the locational rationale for the proposal and assesses environmental effects arising from the chosen site. Officers are satisfied that this approach is proportionate and legally compliant.

The Environmental Statement includes an assessment of cumulative effects, taking into account committed and reasonably foreseeable developments in the surrounding area. Officers are satisfied that, subject to the proposed mitigation, no significant adverse cumulative environmental effects would arise that would outweigh the benefits of the development.

The requirement for a Habitats Regulations Assessment is distinct from EIA. The proposal does not have a likely significant effect on European sites, either alone or in combination, and therefore does not trigger the need for an HRA. This conclusion is supported by Natural England's consultation response.

Objections have referred to the Supreme Court's decision in *Finch v Surrey County Council* [2024], arguing that the Environmental Statement should assess downstream or end-use emissions associated with the development. Officers have had regard to this judgment. The *Finch* case concerned the combustion of fossil fuels where end-use emissions were an inevitable and direct consequence of the development itself. The present proposal relates to a renewable energy facility producing biomethane and does not give rise to comparable downstream combustion impacts arising directly from the development. Officers have had regard to the Supreme Court's decision in *Finch v Surrey County Council*. That judgment concerned a development whose sole purpose was the extraction of fossil fuels, where downstream combustion emissions were an inevitable and direct consequence of the development itself.

The present proposal differs materially in that it is a renewable energy scheme intended to displace fossil gas and deliver net greenhouse gas reductions. While biomethane will ultimately be combusted, the Environmental Statement assesses lifecycle emissions and

demonstrates a net carbon benefit. Officers are therefore satisfied that the scope of the Environmental Statement is appropriate and legally compliant in this context.

Conclusion

Officers are satisfied that the Environmental Statement has identified, described and assessed the likely significant environmental effects of the development, and that, taken together with consultation responses and secured mitigation, it provides sufficient information to enable the Local Planning Authority to reach a reasoned conclusion on those effects in accordance with the EIA Regulations.

6.2 Principle of development

Policy Context

Core Policy 42 of the Wiltshire Core Strategy supports standalone renewable energy development where site-specific impacts, such as landscape, biodiversity, heritage, transport, amenity and agricultural land, are appropriately addressed. The policy does not impose a locational restriction to settlement boundaries, but requires a balanced assessment of impacts having regard to the characteristics of the site and its surroundings. These matters are considered in detail within the topic-based sections of this report.

Where anaerobic digestion (AD) proposals utilise feedstocks that fall within the planning definition of “waste”, Policies WDC1 and WDC2 of the Waste Development Control Policies DPD also apply. These require waste-related development to contribute positively to sustainable development and ensure that environmental, social and economic impacts are avoided or suitably mitigated.

At national level, the National Planning Policy Framework (NPPF) attaches significant weight to renewable and low-carbon energy infrastructure, recognising its essential role in meeting the UK’s net-zero commitments and enhancing long-term energy security. The Framework makes clear that such schemes should be approved where impacts are, or can be made, acceptable.

Taken together, the development plan and national policy establish a strong in-principle presumption in favour of renewable energy development, subject to the satisfactory resolution of site-specific impacts.

Assessment

The proposal is for an anaerobic digestion facility producing biomethane for injection into the national gas grid, together with digestate and captured CO₂. As a form of renewable energy infrastructure, the development aligns in principle with the objectives of Core Policy 42 and with national policy support for low-carbon energy generation, subject to detailed assessment of its impacts.

The site lies within the wider Cotswold Water Park landscape, characterised by a mix of agricultural land, restored and active mineral workings, lakes, ecological assets and dispersed rural commercial uses. It is not located within a National Landscape, Green Belt or other

nationally designated landscape. Although the Cotswold National Landscape lies approximately 5 km to the north-west, the site is visually and physically separated from it. The acceptability of the proposal in this location therefore turns on its site-specific impacts rather than any policy-based exclusion in principle.

There are no designated heritage assets within or adjacent to the site. Intervening distance, landform and vegetation limit intervisibility with more distant assets, and the Environmental Statement assesses potential effects on heritage assets, with detailed consideration of significance and setting addressed later in this report.

From an ecological perspective, the site comprises arable land of relatively low intrinsic ecological value. While the Cotswold Water Park SSSI lies approximately 300 m away, the submitted assessments examine potential hydrological pathways and identify mitigation measures intended to avoid significant effects, as assessed in detail in the Ecology section of this report.

The site benefits from direct access to Ashton Road, connecting to the B4696 Spine Road and the A419 dual carriageway, thereby avoiding village centres and residential streets. Transport impacts and highway safety are considered separately, and do not indicate that the location is unacceptable in principle.

The nearest residential properties are approximately 335 m from the operational areas. Potential impacts relating to odour, noise and lighting have been assessed through the Environmental Statement and are addressed under the Amenity section of this report.

In terms of agricultural land, the site comprises Grade 3 land. While best and most versatile land is afforded protection, Grade 3 land is widespread within the locality. The acceptability of the proposal in principle is not undermined by the loss of agricultural land, which is considered in detail elsewhere in the report.

Minerals Safeguarding and Waste Policy Considerations

In addition to renewable energy policy considerations, the site's location within a Minerals Safeguarding Area requires specific assessment.

The application site lies within a Minerals Safeguarding Area for sand and gravel. Mineral safeguarding policy seeks to prevent the unnecessary permanent sterilisation of viable mineral resources by non-mineral development, unless it can be demonstrated that prior extraction is not practicable or that the development would not prejudice future working.

In this case, the submitted information indicates that comprehensive prior extraction of sand and gravel is not realistically practicable, having regard to groundwater sensitivity, proximity to designated ecological assets, and the site's role within the functioning Cotswold Water Park landscape. These constraints are addressed in detail elsewhere in this report.

Since the preparation of the draft report, a Mineral Resource Assessment has been submitted in support of the application. The assessment, prepared by Savills in accordance with national mineral safeguarding practice guidance, draws on site-specific borehole and trial pit data from

the submitted Ground Investigation Report. It concludes that the site is not underlain by a discrete or workable sand and gravel deposit of the type typically extracted within the Cotswold Water Park. Instead, the superficial deposits are thin and dominated by clay-rich material, with sand occurring only as a minor constituent and no gravel identified across the site. The underlying geology comprises predominantly Kellaways Clay. On this basis, the assessment confirms that the quality and quantity of material present would not support economically viable mineral extraction and that the underlying resource is unlikely to be worked.

However, and importantly in this context, the proposed anaerobic digestion facility is inherently temporary in nature, with an operational lifespan of approximately 25 years. The development would not result in the permanent loss of access to the underlying mineral resource. Following decommissioning, the site could be restored and minerals could be extracted at that stage, or mineral recovery could form part of any future redevelopment proposals, subject to the necessary consents.

In addition, the development will require site levelling and earthworks to facilitate construction. As part of this process, a proportion of sand and gravel would be excavated and utilised or removed, representing a limited and incidental contribution towards mineral recovery, albeit not equivalent to comprehensive prior extraction.

Having regard to the temporary and reversible nature of the development, the absence of permanent built sterilisation, and the scope for mineral recovery both during construction and in the longer term following decommissioning, the proposal is not considered to result in the unjustified sterilisation of safeguarded mineral resources and is therefore acceptable in principle and does not conflict with minerals safeguarding policy.

This approach is consistent with the objectives of minerals safeguarding policy, which seeks to avoid unnecessary sterilisation of viable resources rather than to require extraction where it is impracticable or environmentally constrained.

In addition, the submitted Ground Investigation Report provides useful context regarding the nature of the underlying deposits. While the site lies within a Minerals Safeguarding Area for sand and gravel, the intrusive investigations encountered predominantly clay-rich material across the site, comprising sandy silty clay within the superficial deposits and extensive Kellaways Clay at depth. Although sand is present as a constituent within the Alluvium, it is generally bound within a clay matrix rather than occurring as a discrete, free-draining sand and gravel resource.

On the basis of the submitted Mineral Resource Assessment and ground investigation evidence, officers are satisfied that the site does not contain a viable or economically workable sand and gravel resource. The proposal therefore falls within the exceptions set out in Policy MDC4 of the Wiltshire and Swindon Minerals Development Control Policies, and would not result in the unjustified sterilisation of safeguarded mineral resources.

With regard to waste policy, while the proposal is primarily advanced and assessed as renewable energy infrastructure in accordance with Core Policy 42 of the Wiltshire Core Strategy, recent case law confirms that certain agricultural manures may fall within the planning definition of “waste” in some circumstances. In light of this, the proposal has also

been assessed against Policies WDC1 and WDC2 of the Waste Development Control Policies DPD.

Having regard to both policy frameworks, officers are satisfied that the proposal performs acceptably whether considered as a standalone renewable energy development or as a form of waste-related development. In particular, the scheme incorporates enclosed processing, pollution prevention measures, controlled drainage, appropriate access arrangements and suitable separation distances to sensitive receptors, ensuring that potential waste-related impacts can be avoided or adequately mitigated.

Waste-related impacts are capable of being appropriately managed through the design of the development, planning conditions, and the separate environmental permitting regime. On this basis, the proposal is considered acceptable in principle under both Core Policy 42 of the Wiltshire Core Strategy and Policies WDC1 and WDC2 of the Waste Development Control Policies DPD.

National Energy Policy, Climate Change and Locational Considerations

In addition to the development plan, significant weight is afforded to national energy and climate change policy, which are material considerations in the determination of this application.

The Overarching National Policy Statement for Energy (EN-1) sets out the Government's strategic need for new energy infrastructure in order to deliver a secure, resilient and decarbonised energy system, and recognises that low-carbon energy projects should be supported where impacts can be acceptably managed. Although EN-1 is principally directed at nationally significant infrastructure, it is well-established that its statements of need and policy direction are material to decision-making under the Town and Country Planning Act.

The proposal also directly supports the statutory objectives of the Climate Change Act 2008 (as amended), which commits the UK to achieving net-zero greenhouse gas emissions by 2050, and places an obligation on public bodies to have regard to climate change mitigation when exercising relevant functions. National planning guidance further reinforces this position: the Planning Practice Guidance on Renewable and Low Carbon Energy confirms that planning has an important role in facilitating renewable energy infrastructure in locations where environmental impacts are acceptable, and that the need for such development does not automatically override local considerations but must be assessed on a site-specific basis.

In addition, the Government's Green Gas Support Scheme (GGSS) demonstrates ongoing national policy support for the deployment of biomethane produced via anaerobic digestion and injected into the gas grid, reflecting the recognised role of this technology in decarbonising heat, improving energy security and supporting the circular economy.

With regard to siting, Environment Agency guidance on anaerobic digestion facilities makes clear that such infrastructure is commonly and appropriately located in rural areas close to feedstock sources, subject to suitable separation from sensitive receptors and the implementation of pollution prevention and environmental controls. Taken together, these national policies and guidance establish clear support in principle for anaerobic digestion

facilities, including in countryside locations, subject to the satisfactory resolution of site-specific impacts, which are addressed in the detailed sections of this report.

Energy Security and National Resilience

Recent global events have reinforced the importance of domestic energy security and resilience as a core objective of national policy. Ongoing geopolitical instability, including the conflict in Ukraine and heightened tensions affecting international energy markets, has exposed the UK's historic reliance on imported fossil fuels and the vulnerability of global supply chains. In response, Government policy has consistently emphasised the need to accelerate the deployment of home-grown, low-carbon energy sources in order to reduce exposure to external shocks, improve resilience, and maintain secure and affordable energy supplies.

This position is reflected in the Overarching National Policy Statement for Energy (EN-1), which places substantial weight on infrastructure that contributes to security of supply alongside decarbonisation, and in wider national initiatives such as Clean Power 2030 and continued support for renewable gas through the Green Gas Support Scheme.

Anaerobic digestion and biomethane production are specifically recognised within this policy framework as technologies capable of delivering dispatchable, domestically produced energy that directly substitutes for fossil natural gas. In this context, the contribution of proposals such as the development under consideration to national energy resilience is a material consideration in assessing the principle of development, subject to the satisfactory management of site-specific impacts addressed elsewhere in this report.

Conclusion

The proposal has been assessed in principle against the development plan as a whole, including Core Policy 42 of the Wiltshire Core Strategy and, insofar as relevant, Policies WDC1 and WDC2 of the Waste Development Control Policies DPD. Officers are satisfied that the development is acceptable in principle under both policy frameworks. Paragraph 11(d) of the NPPF is therefore not engaged.

In strategic policy terms, the proposal represents a form of renewable and low-carbon energy development that is supported in principle by national policy and by Core Policy 42, with significant weight attached to its contribution to decarbonisation, energy security and the transition to a low-carbon economy.

The site lies outside nationally designated landscapes, avoids heritage constraints, and benefits from suitable access to the strategic road network. The proposal would not unreasonably prejudice mineral safeguarding objectives and is consistent in principle with the sustainable waste management aims of the Waste Development Control Policies DPD.

Accordingly, and subject to the detailed assessment of site-specific impacts set out in the topic-based sections of this report, the principle of the development is considered acceptable.

6.3 Design and impact on the character and appearance of the area

Policy Context

Chapter 12 of the NPPF requires development to achieve high-quality design that is visually attractive, well-functioning and sympathetic to local character. Paragraph 135 emphasises that planning decisions should ensure proposals contribute positively to local distinctiveness and reinforce a strong sense of place. The National Design Guide further promotes context-sensitive design, use of appropriate materials, and landscape-led approaches.

Core Policy 57 of the Wiltshire Core Strategy requires all development to be of a high design standard, responding positively to the existing character of Wiltshire, integrating effectively with the site and its surroundings, and minimising visual intrusion. For non-residential schemes, this includes appropriate massing, material choice, landscaping and functional layout.

The Ashton Keynes Neighbourhood Plan (Policy HCP1) seeks development that reflects and respects the local character of the parish, including building proportions, materials and landscape setting. It places particular emphasis on safeguarding rural character and ensuring new development integrates sensitively with the wider landscape.

Policies WDC1 and WDC2 of the Waste Development Control Policies DPD additionally require waste-related development to be appropriately sited and designed to minimise visual and landscape impacts.

These policies collectively establish a requirement for high-quality, contextually sensitive design that minimises harm to local character and integrates effectively with the landscape.

Assessment

The design of the scheme has undergone several stages of refinement, informed by consultee feedback and an iterative landscape-led approach. As a result, the proposal now demonstrates a clear intention to reduce scale and massing, improve integration with the rural setting, and adopt materials and layouts that minimise visual prominence.

The layout concentrates the tallest structures, namely the digester tanks, towards the northern part of the site, away from the closest public viewpoints. Ancillary buildings are grouped logically to create a compact operational core, reducing the perceived spread of development. This approach reflects Core Policy 57's requirement for functional and efficient site organisation while managing visual impact.

The design evolution has included significant reductions in height and scale:

- Digesters reduced from five to three, with two flat-topped tanks at 9m and one domed tank reduced to 16.5m.
- Lowered finished ground levels to reduce apparent massing.
- Reduction of the Chicken Manure Processing Building by 3.5m to decrease structure dominance.

These amendments demonstrate clear engagement with policy objectives and constructive responses to design concerns.

The chosen muted, natural tones (e.g., juniper green) and subdued cladding reduce visual contrast with the surrounding agricultural landscape. Roof materials and external finishes have been selected to soften views and avoid industrial overtone. This complies with Core Policy 57 and the Neighbourhood Plan's emphasis on appropriate materials that harmonise with their setting.

The scheme incorporates extensive landscape mitigation, including:

- earth bunding formed from site-won soils
- native tree and hedgerow planting
- species-rich meadows and biodiversity areas
- willow screening at the site entrance
- reinforcement of existing hedgerows

Approximately 40% of the site is now allocated for planting and habitat creation, an increase from 35% in earlier iterations. The landscape-led strategy is consistent with the Wiltshire Design Guide, Core Policy 57 and the Neighbourhood Plan's requirement for sensitive integration within the rural environment.

Over time, this structural planting will soften the appearance of the built elements, reduce visibility from Ashton Road and nearby PRow, and help integrate the facility within the wider Cotswold Water Park character.

External lighting is designed to minimise light spill through downward-directed fittings, warm colour luminaires and the use of presence detection where feasible. The lighting strategy has been informed by rural lighting guidance (including ILP Environmental Zone E2 standards) and is intended to protect rural character, residential amenity and ecological receptors.

The facility's layout reflects operational efficiency, safe circulation and environmental safeguards, while still adopting measures to reduce visual intrusion. The balance between functional necessity and design sensitivity is in line with both the NPPF and CP57, which require developments to be well-designed without compromising their operational purpose.

While the proposal introduces notable and clearly visible structures into a rural setting, officers acknowledge that some adverse effects on local character and landscape remain. However, having regard to the infrastructure nature of the development, the reduced scale and massing, the muted material palette and the extensive landscape mitigation proposed, the design response is considered to represent the best practicable outcome and to limit visual harm to an acceptable level.

Officers note that the Council's Landscape Officer maintains concerns regarding residual landscape harm; however, for the reasons set out above and in the Landscape section of this report, officers consider that the design evolution and mitigation proposed are sufficient to address policy requirements in design terms, notwithstanding that some residual landscape effects are identified and considered further in the Landscape section of this report.

Conclusion

The proposal introduces sizeable infrastructure into a rural landscape; however, the iterative design process, reduced massing, sensitive colour palette and comprehensive landscape strategy collectively demonstrate a clear commitment to achieving high-quality, contextually appropriate design. The facility has been shaped to respect local character as far as practicable, integrating screening, planting and careful site layout to minimise visual intrusion.

On balance, and acknowledging that some residual visual and character impacts remain, the scheme is considered to achieve an acceptable standard of design for development of this nature in accordance with Core Policy 57, the Wiltshire Design Guide, the NPPF's design principles, the Ashton Keynes Neighbourhood Plan, and Policies WDC1 and WDC2. Subject to conditions securing final materials, landscaping and lighting details, the development is acceptable in design terms.

6.4 Impact on Heritage Assets

Policy Context

The statutory duties under the Planning (Listed Buildings and Conservation Areas) Act 1990 are central to decision-making.

- Section 66 requires the Council to give *special regard* to the desirability of preserving listed buildings, their settings, and any features of special architectural or historic interest.
- Section 72(1) requires *special attention* to be paid to preserving or enhancing the character or appearance of Conservation Areas.

Chapter 16 of the NPPF (December 2024) sets out national policy for conserving and enhancing the historic environment. Key provisions require:

- *Great weight* to be given to conserving designated heritage assets (para. 212);
- *Clear and convincing justification* for any harm (para. 213);
- balancing any harm against public benefits (paras. 215–216);
- ensuring development sustains significance and contributes positively to local character (paras. 208 & 210).

Wiltshire Core Strategy Policies CP57 and CP58 require high-quality design that responds positively to the historic environment, conserving or where appropriate enhancing heritage assets and their settings.

Policy WDC9 of the Waste Development Control Policies DPD requires waste-related development to protect archaeological remains, heritage assets and their settings and to secure appropriate investigation and mitigation.

The Ashton Keynes Neighbourhood Plan (Policy HCP1) expects development to respond positively to local character, including scale, materials and the setting of heritage assets.

Assessment

Designated Heritage Assets

The application site lies within an archaeologically rich landscape but is well separated from designated heritage assets. The submitted Heritage Statement, together with site analysis and consultee input, provides an adequate understanding of the significance of nearby listed buildings and their settings, thereby meeting NPPF requirements for proportionate assessment.

The Council's Senior Conservation Officer raises no objection, confirming that the proposals meet the requirements of conservation legislation and national and local heritage policy. They note that some limited intervisibility exists between the upper storeys of the Grade II listed Ashtonfields Community Hall cluster and the tops of the silage clamps (Approx. 560m separation distance); however, they conclude this would amount only to a minor adverse change that would not harm the elements of setting that contribute to significance, and therefore results in no harm (either substantial or less than substantial) to the heritage asset.

Ashton Keynes Conservation Area lies approximately 1 km to the south. Given intervening vegetation, distance and landform, there is no intervisibility or functional relationship such that the character or appearance of the Conservation Area would be affected. No harm arises.

Scheduled Monuments lie between 350 m and 1.7 km from the site. Their settings are not materially affected, as confirmed by the Conservation Officer and supported by the applicant's assessment. Existing vegetation, distance and the low-lying nature of the site ensure that their significance is preserved.

As no harm to the significance of designated heritage assets has been identified, the balancing exercise set out in paragraphs 215–216 of the NPPF is not engaged.

Archaeology

The County Archaeologist has reviewed the outcomes of the trial trench evaluation and has withdrawn the previous objection, confirming that the archaeological potential has now been satisfactorily characterised. He advises that a targeted strip, map and record excavation is required over the area of archaeological interest identified in Trench 19 (minimum 30 × 30 m plus contingency). This can be secured by condition requiring the submission, approval and full implementation of a written programme of archaeological investigation prior to commencement. This is consistent with ClfA standards and ensures appropriate investigation, recording and archiving.

Design Response in Relation to Heritage

Several design refinements have been incorporated to reduce any perceptible effects on heritage settings:

- lowering the Chicken Manure Processing Building by 3.5 m
- expanding structural planting and bunding
- introducing a native willow screen at the site entrance

- refined colour palette and materials
- increased green infrastructure and native meadow planting

These changes reduce visibility of the built elements and further protect the wider heritage landscape. The Conservation Officer confirms that these revisions do not alter her previous assessment and remain acceptable.

The scheme therefore sustains the significance of designated heritage assets, aligning with CP57 and CP58, and meets the expectations of the NPPF in ensuring development is sympathetic to the historic environment.

Conclusion

The proposal has been robustly assessed against statutory duties, national policy (NPPF Chapter 16), and local heritage policies CP57, CP58 and WDC9. Designated heritage assets, including listed buildings, Scheduled Monuments and the Ashton Keynes Conservation Area, are sufficiently distant and visually contained to avoid harm to their significance or settings.

The Council's Senior Conservation Officer raises no objection, confirming that the proposals conserve significance and comply with conservation legislation and policy. The County Archaeologist has withdrawn previous objections, subject to a standard condition requiring a targeted archaeological strip, map and record exercise.

Subject to the imposition of an archaeological condition, the development is considered acceptable in heritage terms and compliant with the statutory duties and policy requirements, the NPPF, Wiltshire Core Strategy Policies CP58 and CP57, Policy WDC9 and the Ashton Keynes Neighbourhood Plan.

6.5 Landscape and Visual Impact

Policy Context

National Policy

The NPPF requires landscapes and scenic beauty to be protected and enhanced, with particular weight given where proposals would affect nationally designated landscapes and other assets of particular importance. In this case the site is not within a nationally designated landscape, and the application is therefore assessed on its site-specific landscape and visual effects within the overall planning balance.

Local Policy

- Core Policy 51 (WCS) requires development to protect, conserve, and, where possible, enhance the character and quality of Wiltshire's landscapes. Particular weight is given to proposals that may affect National Landscapes, locally valued landscapes, and sensitive settlement edges.

- Core Policy 57 (WCS) and the Wiltshire Design Guide SPD (2024) provide guidance on integrating development into the landscape through appropriate design, layout, and mitigation.
- The Green & Blue Infrastructure Strategy (2022–2030) supports the protection and enhancement of landscape character and connectivity.
- Policy WDC7 of the Waste Development Control Policies DPD requires waste management development to protect and, where possible, enhance landscape character and the wider countryside, informed by the Wiltshire Landscape Character Assessment. Particular care is required where development affects sensitive landscapes or the setting of settlements.
- Ashton Keynes NP Policy – Landscape Character & Tranquillity: Development should protect, conserve and enhance landscape character, maintaining the tranquillity and sense of place of the Parish. Proposals must be sensitive to the local settlement pattern and the environmental qualities of the Cotswold Water Park.

Assessment

The application is supported by a Landscape and Visual Impact Assessment (LVIA), prepared in accordance with GLVIA3, with reference to Landscape Institute visualisation guidance (2019) and subsequent clarifications (2024), Natural England guidance on landscape character and sensitivity, and relevant local landscape character assessments. A study area of 2 km has been adopted, and the methodology combines sensitivity and magnitude to determine significance, supported by professional judgement. An updated Appendix 7.1 accompanies the ES Addendum and sets out the assessment matrices and criteria used.

The applicant describes the baseline as a c.7 ha area of arable land located on the eastern slope of Ashton Down within the Cotswold Water Park, with multiple SSSI units within approximately 0.6–0.7 km. The site is not subject to a national or local landscape designation, and the Cotswolds National Landscape lies at some distance. The surrounding landscape is characterised in the LVIA as dynamic and evolving, influenced by wetland restoration, recreation, nature recovery, hedgerows, public rights of way and the presence of nearby minerals and industrial uses.

Since submission in 2023, the applicant identifies a series of design changes and refinements, including a reduction in the number of digesters from five to three; two flat-topped digesters at 9 m and one domed digester at 16.5 m; reduced bulk and massing through lowered finished levels; a reduction in the height of the Chicken Manure Processing Building; and a substantial expansion of boundary woodland and hedgerow planting. Approximately 40% of the site is now proposed as landscape planting or habitat creation, including woodland belts, meadow areas and willow screening near the access (see figure 5 below). Lighting is proposed to accord with ILP E2 thresholds.



Figure 5 – Landscape Planting Strategy

The LVIA acknowledges noticeable near-field change resulting from the introduction of large plant and infrastructure but concludes that effects would be largely localised. It assesses adverse effects for close-range receptors, including Ashton Road and adjacent public rights of way, during early years of operation, reducing to minor or moderate adverse by Year 15 (see photomontages below) as planting matures. Effects at the wider landscape scale and on the Cotswolds National Landscape are assessed as negligible due to distance and intervening screening.



View Northwest from Ashton Road – Existing



View Northwest from Ashton Road – Photomontage Year 1 Mitigation



View Northwest from Ashton Road – Photomontage Year 15 Mitigation



View Southwest from Ashton Road – Existing



View Southwest from Ashton Road – Photomontage Year 1 Mitigation



View Southwest from Ashton Road – Photomontage Year 15 Mitigation



View Northeast from Public Footpath AKEY4 – Existing



View Northeast from Public Footpath AKEY4 – Photomontage Year 1 Mitigation



View Northeast from Public Footpath AKEY4 – Photomontage Year 15 Mitigation



View Southeast from Public Footpath AKEY4 – Existing



View Southeast from Public Footpath AKEY4 – Photomontage Year 1 Mitigation



View Southeast from Public Footpath AKEY4 – Photomontage Year 15 Mitigation

The Council's Senior Landscape Officer maintains a landscape objection to the proposal. While he broadly agrees that the most pronounced effects would be localised, he does not agree with the applicant's characterisation of the scheme as "landscape led", nor with the

sensitivity attributed to receptors, the magnitude of effects identified, or the conclusions reached on residual impact.

In the Landscape Officer's professional judgement, the extensive mitigation proposed, including earth mounding, woodland belts and structural planting, is a response to the inherent unsuitability of the site for a development of this industrial nature and scale, rather than evidence of a landscape-led design approach. The mitigation is considered necessary to attempt to reduce the visual effects of the height, bulk and massing of the development, rather than representing landscape enhancement or betterment.

Particular concern is raised regarding the extent of landform alteration required. The proposal involves substantial excavation across approximately 7 ha of a locally recognised hillside feature in order to create level development platforms. This engineered re-profiling would fundamentally alter the existing landform and introduce an industrialised character into an otherwise open rural landscape. In the Landscape Officer's view, this landform change represents a significant adverse effect in its own right and is not adequately reflected in the LVIA's assessment of magnitude or significance.

While the LVIA concludes that residual effects would reduce to acceptable levels by Year 15 of operation, the Landscape Officer considers that the assessment overstates the effectiveness of mitigation, particularly in winter or leaf-off conditions and from close-range public receptors, including Ashton Road and adjacent public rights of way. In his opinion, key elements of the development, notably the digester tanks, associated plant and engineered platforms, would remain perceptible for much of the operational lifetime and would continue to read as industrialising features within a sensitive and locally valued landscape.

Concerns are also raised regarding the reversibility and sustainability of the proposal from a landscape perspective. Although the development is proposed for a 25-year operational period with subsequent decommissioning and restoration to agriculture, the scale of excavation required raises uncertainty as to whether the original hillside profile could realistically be reinstated. Given the site's location within a Minerals Safeguarding Area for sand and gravel, questions are raised as to whether excavated material would be retained for restoration and how equivalent landform would be recreated at the end of the development's life. Officers recognise this concern. The temporary nature of the permission and the restoration of landform/soils would be controlled through the decommissioning and restoration strategy secured by condition (and any associated plans), including requirements for the retention/management of excavated material and the reinstatement of final levels and landform.

Overall, the Landscape Officer concludes that the site is not a suitable location for a development of this industrial nature and scale, and that the proposal would result in unacceptable levels of localised landscape and visual harm, contrary to Core Policy 51 of the Wiltshire Core Strategy. This objection remains notwithstanding the design amendments and additional mitigation proposed.

Notwithstanding the above objection, it is also relevant to have regard to the wider landscape context within which the site sits. While locally valued and sensitive, this part of the Cotswold Water Park is characterised by a mixed and working landscape, influenced by a range of

existing utilitarian, recreational and industrial features alongside agriculture. A building materials supplier operated by Aggregate Industries lies approximately 120 m to the south-east of the site, while to the south-west there is a somewhat isolated residential development at a distance of around 350 m. Sailing lakes, associated buildings, holiday parks (including caravan accommodation) and the infrastructure required to support leisure and tourism uses are evident within the surrounding landscape. In the wider area, Lakeside Business Park and other industrial buildings on the edge of South Cerney, together with the built form of South Cerney itself, are perceptible, as are Hills Quarry to the north-west and other former minerals sites at varying stages from active operation through to remediation and post-restoration. A sewage treatment works also forms part of the local landscape fabric. These elements, interspersed with agricultural fields, contribute to a landscape that is already influenced by human intervention and change. This context does not negate the landscape and visual harm identified by the Council's Landscape Officer, but it does inform the degree of sensitivity of the receiving environment and the weight to be attributed to the resulting harm in the overall planning balance.

In assessing the sensitivity and capacity of the receiving landscape, it is also relevant to have regard to adopted minerals planning policy and allocations within the wider Cotswold Water Park / Upper Thames Valley.

The application site lies within the wider Cotswold Water Park / Upper Thames Valley, which is identified within the adopted Wiltshire and Swindon minerals planning framework as the principal area for sand and gravel extraction. This area includes a number of formally allocated minerals sites, such as Barnground, South Cerney (Inset Map N7 of the Aggregate Minerals Site Allocations Local Plan), which are intended to contribute to the planned supply of aggregates over the plan period.

The allocation of these sites reflects a development plan judgement that, while sensitive, the landscape character of this area is capable of accommodating large-scale mineral working in principle, subject to detailed assessment and mitigation. Mineral extraction represents a land use involving open excavation, significant landform change, processing plant and prolonged operational activity.

In this context, the proposed anaerobic digestion facility, which is temporary in nature and would be subject to restoration following decommissioning, represents a less intrusive form of development than mineral extraction. While the proposal would give rise to localised landscape and visual effects, these must be assessed against a baseline landscape that already forms part of a planned and managed mineral and waste landscape rather than an undeveloped countryside setting.

This context does not negate the identified landscape harm, but it does provide important background when assessing its scale, significance and weight in the overall planning balance.

While the Council's Landscape Officer maintains an objection, officers consider that the revised scheme, incorporating reduced building heights, lowered site levels and extensive structural planting, would result in moderate, localised harm to landscape character and close-range views. That harm is acknowledged and carries moderate weight, but is considered acceptable in the context of the proposal's public benefits, for the reasons set out in this

section and the planning balance. The harm would not undermine the overall integrity of the Cotswold Water Park landscape and is considered acceptable in the context of Core Policy 51 and paragraph 176 of the NPPF.

Conclusion

Officers place significant weight on the professional advice of the Council's Landscape Officer and accept that the proposal would result in identifiable and adverse localised landscape effects. The conclusion reached reflects a planning judgement that those harms, while real and afforded moderate weight, do not outweigh the proposal's public benefits when assessed against the development plan as a whole.

The proposal would introduce tall and bulky industrial structures, engineered landform changes and associated infrastructure into a sensitive and locally valued part of the Cotswold Water Park landscape. This would result in discernible landscape and visual harm, particularly for close-range receptors such as users of Ashton Road and adjacent public rights of way, with early-year effects assessed as moderate adverse and residual effects likely to remain perceptible over the longer term.

Officers acknowledge the continuing objection from the Council's Senior Landscape Officer and accept that the development would give rise to a degree of localised erosion of landscape character. That harm is afforded moderate weight in the planning balance. However, having regard to the revised scale and massing of the development, the extensive structural planting and mitigation proposed, the wider mixed and working landscape context, and the fact that effects would be localised rather than widespread, officers consider that the residual landscape and visual impacts would not undermine the overall integrity of the Cotswold Water Park landscape.

On this basis, while the proposal does not fully accord with the landscape protection aims of Core Policy 51 and the relevant Neighbourhood Plan policies, the degree of harm identified is not considered to be so significant as to justify refusal when assessed in the context of the development plan as a whole. The identified landscape harm is therefore carried forward as a material consideration of moderate weight in the overall planning balance.

6.6 Loss of Agricultural Land (Best and Most Versatile Land)

Policy Context

The NPPF requires decision-makers to recognise the economic and wider benefits of the best and most versatile (BMV) agricultural land (Grades 1, 2 and 3a). Paragraph 187(b) emphasises the need to protect such land where possible, and the Planning Practice Guidance (PPG Paragraph 001, Ref ID: 8-001-20190721) clarifies how agricultural land quality should be considered in the planning process.

Grade 3 land can fall within BMV (3a) or non-BMV (3b). In Wiltshire, much of the rural area is characterised by undifferentiated Grade 3 land, and Natural England's published classification does not always distinguish between Grades 3a and 3b at site-specific level.

Local policy does not preclude development on agricultural land but requires that impacts are minimised and justified. Policy WDC2 of the Waste Development Control Policies DPD similarly advises that BMV land should be protected unless overridden by wider sustainability considerations.

Assessment

Agricultural Land Classification and Scale of Loss

The application site comprises approximately 6.99 ha of Grade 3 arable land. As the available ALC data does not differentiate between Grades 3a and 3b, it is treated cautiously as potential BMV land. The scale of permanent loss is therefore a material planning consideration, but is not, in proportional terms, unusually large in the context of the site or the surrounding agricultural landscape.

Natural England did not comment substantively on land quality because the area falls below the 20 ha consultation threshold. However, the LPA must still assess the loss, irrespective of the threshold.

Justification for the Loss of Agricultural Land

The applicant acknowledges the land is Grade 3 but explains that Grade 3 predominates across the wider locality. The site selection process indicates that avoiding Grade 3 agricultural land entirely would severely restrict available options and would be unlikely to materially reduce agricultural land impacts given the predominance of land of similar quality in the locality.

The site lies within an established agricultural landscape where land of similar quality is abundant. There is no evidence that the site represents an unusually high-quality parcel within the wider farm holding, nor that the proposal would undermine the long-term viability of the remaining agricultural land.

Balancing Loss Against Agricultural and Public Benefits

Although the proposal results in permanent loss of agricultural land, several countervailing benefits arise directly from the development and carry weight in the planning balance:

Agricultural Benefits:

- The AD plant would support local farm businesses by providing a stable market for crops and agricultural by-products.
- The production of digestate substitutes for artificial fertiliser, offering benefits in soil structure, nutrient management and reduced carbon intensity.
- The facility contributes to farm diversification, improving resilience in a sector affected by rising input costs and changing subsidy regimes.

Environmental and Public Benefits:

- Biomethane production contributes to renewable and low-carbon energy generation, supporting national and local climate-change objectives.
- The proposal achieves biodiversity enhancements through new planting, habitat creation and management areas, helping offset ecological effects associated with the loss of arable land, while recognising that this does not replace its agricultural productive function.
- The scheme supports energy security, reducing reliance on imported fossil gas and aligning with wider governmental aims of increasing domestic renewable energy production.

Overall Judgement on Agricultural Land Loss

The 6.99 ha loss does represent a moderate degree of agricultural harm, which is afforded moderate weight. However, in the local context, where Grade 3 land is widespread, and given that alternative sites would likely result in a comparable loss of similar land, the proposal is not considered to give rise to an unacceptable impact.

When balanced against the identified agricultural, environmental and energy-security benefits, the loss of agricultural land is judged to be justified.

Policy WDC2 allows loss of BMV land where outweighed by overriding sustainability considerations. In this case, the renewable energy benefits, waste-recovery role, support for local agriculture and contribution to climate and energy objectives constitute such considerations.

Conclusion

On balance, the permanent loss of approximately 6.99 ha of Grade 3 agricultural land is considered acceptable and justified, having regard to its scale, the local prevalence of land of similar quality, and the benefits arising from the proposal. While the loss attracts moderate weight as a planning harm, it is outweighed by the identified agricultural, environmental and energy-security benefits of the proposal, including rural diversification, support for agricultural businesses, production of digestate, generation of low-carbon renewable gas, and contribution to wider sustainability and energy-security objectives. The proposal therefore accords with the NPPF, Core Strategy objectives and Policy WDC2 of the Waste Development Control Policies DPD.

6.7 Impact on Amenity of Nearby Properties

Policy Context

Paragraph 135 of the NPPF requires that development achieves a high standard of amenity for existing and future occupants. This includes safeguarding against unacceptable levels of noise, disturbance, air pollution, odour and light.

Core Policy 57 of the Wiltshire Core Strategy requires development to be compatible with adjoining uses and to protect the amenities of existing residents. It highlights the need to avoid

unacceptable impacts relating to privacy, overshadowing, noise, vibration, pollution, light intrusion and general disturbance.

Policies WDC1 and WDC2 of the Waste Development Control Policies DPD require waste-related development to avoid, mitigate or compensate for amenity impacts, including noise, odour, air quality, lighting and visual disturbance.

These policy requirements form the basis for the amenity assessment below.

Assessment

Overall Compatibility of Use and Local Context

The site is located within a rural agricultural landscape characterised by dispersed farmsteads, tourism uses and recreational assets of the Cotswold Water Park. The nearest residential properties lie approximately 335m from the operational area. At this separation distance, and with bunding, planting and enclosed processes, the proposal is considered compatible with nearby sensitive receptors in amenity terms. The following topic-specific impacts have been considered in detail.

Overlooking and Loss of Privacy

The development consists of functional industrial structures with no habitable rooms, elevated platforms or viewpoints. There are no windows or openings facing residential properties, and the nearest dwelling lies well beyond typical overlooking distances. Existing hedgerows, proposed bunding and structural planting further reinforce separation.

Finding: The proposal would not result in loss of privacy or overlooking. It complies with CP57.

Loss of Light and Overshadowing

All built structures are positioned centrally within a 6.99 ha site and are separated from residential properties by over 300 m. Overshadowing impacts typically arise at distances far shorter than those involved here. The agricultural landscape between the site and nearby properties limits potential shadowing effects.

Finding: No loss of daylight or sunlight would occur; CP57 is satisfied.

Overbearing Impact and Outlook

The AD facility includes tanks and process buildings that are tall in relative terms; however:

- the tallest structures are positioned towards the centre of the site
- the cluster of residential properties at the Cotswold Community lies over 300 m away
- landscape bunding and new woodland belts will soften views over time

Even during early operational years, separation distances prevent any sense of enclosure or visual dominance. The development will remain a perceptible but distant feature in the wider rural panorama.

Finding: The proposal would not be overbearing and would not unacceptably alter the outlook for neighbouring occupiers.

Noise and Disturbance

The Noise Impact Assessment predicts:

- low daytime noise impact at nearest receptors
- nighttime rating levels 5–7 dB above background, requiring mitigation

Public Protection recognises the low background noise levels in this rural location and recommends conditions to secure:

- enhanced plant attenuation
- operational noise limits
- post-installation verification and monitoring
- restrictions on construction hours
- submission of a Construction Environmental Management Plan (CEMP)

The AD process itself is largely enclosed, and routine operations can be effectively controlled through modern plant specification.

Finding: With robust conditions, residual noise impacts can be reduced to acceptable levels consistent with CP57 and WDC policies.

Lighting

The lighting scheme has been assessed against ILP GN01/21 for Environmental Zone E2. The design incorporates:

- downward-directed luminaires
- low-spill fittings
- warm-white colour temperatures
- limited operational area coverage

At 300+m separation, and with bunding/planting, measurable light spill at dwellings will be negligible.

Finding: The lighting scheme is acceptable and can be controlled by condition.

Air Quality

Dispersion modelling demonstrates that predicted pollutant concentrations at residential and school receptors remain well below guideline thresholds. Traffic emissions and dust risks during construction are low and can be mitigated through the CEMP.

Finding: Air quality impacts are acceptable subject to standard controls.

Odour

Odour impacts have been assessed using a qualitative approach, having regard to the nature of the proposed development, the characteristics of the receiving environment and the proximity of sensitive receptors. Public Protection has highlighted the need for appropriate assurance in this case, given the rural tranquillity of the surrounding area, prevailing south-westerly wind direction and separation distances to nearby receptors in excess of 300 metres.

The proposed facility incorporates a number of inherent design and operational measures intended to minimise odour generation, including enclosed material handling, covered storage and controlled process areas. These measures provide a degree of mitigation at source and are typical of modern anaerobic digestion facilities.

National advice within the Planning Practice Guidance is clear that, where development is subject to the Environmental Permitting regime, planning authorities should avoid duplicating controls that are more appropriately secured and enforced through permitting. In particular, the PPG advises that matters such as odour management, operational controls and ongoing monitoring are normally controlled through the Environmental Permit issued by the Environment Agency, rather than through planning conditions. The Environment Agency has established guidance requiring the submission, approval and ongoing implementation of an Odour Management Plan as part of the permitting process, where there is potential for odour impacts.

From a planning perspective, the key consideration is whether the development is acceptable in principle and whether odour impacts are likely to give rise to unacceptable harm, rather than the detailed operational management of odour over the lifetime of the facility. Taking account of the embedded design measures, the scale and nature of the proposal, and the separation distances involved, it is considered that odour impacts are capable of being adequately managed.

Accordingly, while detailed odour control will be secured through the Environmental Permit, it is reasonable to conclude that, subject to compliance with permitting requirements, odour impacts arising from the development are not expected to be unacceptable in planning terms. Ongoing management and regulatory control will be delivered through the Environment Agency's permitting and enforcement regime.

Construction Amenity

Construction activities have the potential to cause short-term disturbance through noise, dust and traffic. These can be effectively managed through a CEMP, limiting hours of work, routing, dust suppression and community liaison measures.

Finding: Construction impacts are acceptable with a CEMP.

Third Party Representations

Concerns regarding odour, noise, traffic, health impacts and the erosion of rural tranquillity have been carefully considered. The technical evidence confirms that these matters can be mitigated. Public Protection's requested conditions address the identified uncertainties (notably noise and odour) and will ensure impacts do not reach unacceptable levels.

Finding: Public concerns are acknowledged, but do not indicate unacceptable amenity impacts once mitigation is secured.

Officers have also considered the cumulative effect of noise, odour, lighting and traffic on nearby receptors and are satisfied that, taken together and subject to mitigation, these impacts would not result in unacceptable harm to residential amenity.

Conclusion

Subject to comprehensive mitigation secured by condition, including noise limits and verification, Odour Management Plan, CEMP, lighting controls and operational management, the proposed development would not result in unacceptable effects on the amenity of nearby residential properties or other sensitive receptors.

The separation distances, enclosed processes, landscape buffering and the ability to control residual impacts through enforceable conditions ensure that the development can achieve a high standard of amenity for nearby occupiers throughout its operational life.

The proposal therefore accords with NPPF paragraph 135, Core Policy 57 of the Wiltshire Core Strategy, and Policies WDC1 and WDC2 of the Waste Development Control Policies DPD.

6.8 Wider Environmental Considerations (Noise, Air Quality, Contaminated Land, etc.)

Policy Context

The National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG) emphasise that planning decisions must prevent new and existing development from contributing to, or being exposed to, unacceptable levels of pollution. This includes ensuring that proposals do not create risks to health, well-being, or the environment.

Within the Wiltshire Core Strategy, Core Policies 55 and 56 require that development avoids unacceptable environmental impacts and safeguards the health and amenity of surrounding communities and future site users. The Council's Air Quality Supplementary Planning Document (SPD) provides detailed guidance on assessing and mitigating air quality impacts, particularly in or near Air Quality Management Areas (AQMAs).

In addition, Core Policy 57 addresses amenity considerations, requiring that development avoids or mitigates potential pollutants such as noise, air pollution, odour, vibration, light spill, and land contamination. This is particularly relevant for large-scale commercial, industrial, or infrastructure projects, where operational impacts may be significant.

Furthermore, Policies WDC2 and WDC4 of the Waste Development Control Policies DPD require waste management development to avoid unacceptable impacts arising from contamination, air emissions or pollution.

Links:

[Wiltshire Core Strategy - Wiltshire Council](#)

[National Planning Policy Framework - GOV.UK](#)

[Air quality - GOV.UK](#)

[Land affected by contamination - GOV.UK](#)

[Land stability - GOV.UK](#)

[Light pollution - GOV.UK](#)

[Noise - GOV.UK](#)

Assessment

In addition to the amenity impacts on nearby receptors considered above, the proposal has been assessed more widely in terms of its potential effects on the environment, including pollution risk, land quality, water resources and operational safety. These matters are addressed through the Environmental Statement (ES), subsequent ES Addendum, and consultee responses.

Noise (Environmental Context)

While noise impacts on residential amenity are addressed above, it is also relevant to consider noise in a broader environmental context. The submitted Noise Impact Assessment and subsequent update conclude that operational noise from the facility would be low in absolute terms and would not give rise to significant adverse effects on the wider environmental soundscape beyond the site boundary. The assessment demonstrates compliance with BS4142 and the Noise Policy Statement for England, with predicted effects remaining below levels associated with adverse or significant adverse effects.

Public Protection raises no objection on noise grounds subject to conditions securing operational noise limits, verification testing and ongoing monitoring. With these controls in place, the proposal would not give rise to unacceptable environmental noise effects, nor would it undermine the wider environmental quality of the area.

Air Quality, Odour and Emissions

Air quality has been comprehensively assessed through the submitted Air Quality Impact Assessment and the 2025 Addendum, which consider emissions to air during both construction and operation. These assessments address a wide range of potential pollutants including oxides of nitrogen, ammonia, particulates, bioaerosols and odour, as well as impacts on designated ecological sites.

The modelling and qualitative assessments demonstrate that predicted pollutant concentrations would remain well below relevant air quality standards and ecological critical thresholds, with no unacceptable effects on air quality or designated environmental receptors. Construction phase dust impacts are assessed as not significant and capable of being controlled through standard good practice measures secured via a Construction Environmental Management Plan (CEMP).

Odour has been assessed using an industry-accepted qualitative source–pathway–receptor methodology, with reference to IAQM guidance and Environment Agency technical guidance. While recognising the sensitivity of the rural location, the assessments conclude that odour impacts would not be significant in environmental terms, subject to the implementation of appropriate operational controls secured through an Odour Management Plan. Public Protection advises that an Odour Management Plan should be secured by condition, setting out detailed operational procedures, monitoring, complaint handling and contingency measures. This approach is considered proportionate and consistent with national guidance.

Overall, subject to conditions and the separate environmental permitting regime, the proposal would not result in unacceptable air quality or odour impacts on the wider environment.

Land Quality and Contamination

Land quality and contamination risks are addressed through the Preliminary Land Quality Risk Assessment and ES Chapter 8. The site itself comprises undeveloped agricultural land, with no evidence of significant on-site contamination identified through desk study, site walkover or preliminary investigation.

Potential off-site contamination sources, including a closed landfill to the east of Ashton Road, have been identified and assessed. The qualitative risk assessment concludes that, with appropriate design and mitigation, risks to human health, controlled waters and the environment would be low. Further investigation, verification and, if necessary, remediation can be secured through planning conditions to ensure the site is suitable for its intended use and would not meet the definition of contaminated land under Part 2A of the Environmental Protection Act 1990.

On this basis, the proposal is considered acceptable in land quality terms and consistent with the objectives of the NPPF and Policies WDC2 and WDC4.

Water Environment, Hydrology and Hydrogeology

The hydrological and hydrogeological effects of the development are addressed in ES Chapter 6 and the updated Flood Risk Assessment. The site lies within Flood Zone 1 and is not at risk of fluvial flooding. The assessment demonstrates that the development can be designed to ensure that surface water runoff is appropriately managed, discharged at greenfield rates and does not increase flood risk elsewhere.

Potential risks to groundwater and surface waters, including those associated with process waters, digestate storage and contaminated runoff, have been carefully considered. The proposed design incorporates sealed drainage systems, bunded storage, interception and

reuse of contaminated runoff within the process, and separation of clean and dirty water systems. Subject to conditions securing the detailed drainage strategy and construction controls, no significant adverse hydrological or hydrogeological effects are anticipated.

The Environment Agency raises no objection to the proposal, noting that the facility will be subject to the Environmental Permitting Regulations, through which matters such as groundwater protection, emissions, surface water management and accident prevention will be further regulated.

Operational Safety and Accident Risk

Potential risks associated with accidents, including fire, gas release and extreme weather events, are considered within ES Chapter 11 and supporting documentation. The assessment concludes that the likelihood of major accidents or disasters is low, given the nature of the development, its location and the regulatory controls governing anaerobic digestion facilities. The site will operate within a highly regulated framework, including the Environmental Permitting regime and health and safety legislation. Measures such as enclosed processes, automated monitoring systems, controlled access, and detailed operational procedures are proposed to minimise risk. These matters are considered capable of being appropriately managed through the Environmental Permitting regime and relevant health and safety legislation, and do not indicate unacceptable environmental risk.

EA Permitting

The above need for Environmental Permitting and claims from third parties that the scheme is “unlikely to be licensable” are acknowledged. However, environmental permitting operates under a separate statutory regime. It is well established that planning permission should not be withheld solely on the basis that a permit has not yet been issued, provided that there is no clear evidence that the development could not be lawfully operated.

Officers acknowledge that the Environment Agency has identified sensitivities associated with the site’s proximity to designated ecological assets and groundwater protection zones, which may present challenges during the permitting process. However, there is no evidence before the Council that the development could not be lawfully operated, and it is not for the planning authority to pre-empt the outcome of the permitting regime.

Cumulative Effects

Officers have also considered the potential cumulative environmental effects of emissions, land quality, water management and operational risk, and are satisfied that, taken together, these do not give rise to unacceptable environmental harm.

Conclusion

The wider environmental effects of the proposed anaerobic digestion facility have been comprehensively assessed through the submitted Environmental Statement, Addendum and consultee responses. Subject to appropriate mitigation secured by planning condition and the operation of separate regulatory regimes, the proposal would not result in unacceptable

impacts in respect of noise, air quality, odour, land contamination, water resources or operational safety.

Accordingly, the development is considered to accord with the environmental protection objectives of the NPPF, Core Policies 55, 56 and 57 of the Wiltshire Core Strategy, and Policies WDC2 and WDC4 of the Waste Development Control Policies DPD.

6.9 Highway Safety and Parking

Policy Context

Chapter 9 of the NPPF requires development to ensure safe and suitable access for all users (paras. 110 & 115), to prioritise sustainable travel (para. 117), and confirms that proposals should only be refused on highway grounds where impacts on safety would be unacceptable, or where residual cumulative impacts would be severe (para. 116).

Core Policies 60–64 of the Wiltshire Core Strategy require development to provide safe access, avoid severe impacts on the transport network, promote sustainable transport, supply appropriate parking, and safeguard public rights of way.

Policies WDC1 and WDC11 of the Waste Development Control Policies DPD require waste related development to demonstrate safe access, appropriate routing, and that highway impacts can be mitigated to avoid unacceptable effects on safety or amenity.

The Ashton Keynes Neighbourhood Plan adds a local layer of policy:

- Policy INP2 – development must not worsen road or pedestrian safety risks.
- Policy ENP2 – encourages protection and enhancement of footpaths, bridleways and cycleways.

These policies provide the framework for assessing the proposal's highway impacts.

Assessment

Access Design and Highway Safety

The proposal includes upgrading the existing agricultural access onto Ashton Road to a fully engineered priority junction with appropriate junction radii, visibility splays (2.4m × 160m) and swept path-tested geometry. These meet national and local design standards and ensure articulated HGVs, tractor-trailers and service vehicles can enter and exit safely.

Crucially, the gates are set back approx. 35 m from the carriageway edge, enabling the largest HGV to wait clear of the highway should the site be closed temporarily. This responds directly to Highways' earlier request for increased setback to prevent highway obstruction.

Ashton Road already accommodates existing HGV traffic from agricultural and industrial uses, and accident data indicates no pattern of HGV-related collisions or underlying highway

deficiencies. On this basis, and with the improved junction arrangement, the highway environment is suitable for the scale and type of vehicles proposed.

Wiltshire Highways have confirmed no objection, subject to standard access construction and visibility conditions, a Construction Management Plan (CMP), and pre- and post-construction condition surveys.

Officer judgement: The access arrangement satisfies NPPF paras. 110 & 115 and CP60–61. Highway safety impacts are acceptable.

Traffic Generation and Residual Cumulative Impact

During normal operation, the facility would generate approximately 37–44 HGV/tractor trips per day, with seasonal peaks up to 80 trips per day during harvest periods. Around half of these movements are already present on the highway network due to existing agricultural activities serving the same local farms.

These movements are dispersed throughout the day, reflecting agricultural processes rather than concentrated commuter peaks.

Construction traffic over the 70-week construction phase would be controlled by a CMP, ensuring appropriate routing via the B4696/A419, with on-site parking, wheel washing and traffic management measures secured by condition.

In assessing cumulative impact, the local highway network, particularly the B4696 Spine Road and A419, has sufficient capacity to absorb the proposed traffic without approaching a “severe” level of impact. Highways agree with this conclusion and maintain their no-objection position following additional 2024/2025 scheme refinements that further reduced overall vehicle movements.

Officer judgement: Residual cumulative impacts fall well below the NPPF para. 116 threshold. There is no sound highway or traffic-related reason to justify refusal of the proposal.

Parking, Internal Circulation and On-Site Management

The proposal includes:

- Six staff/visitor car parking spaces, sufficient for the very low employee numbers (fifteen FTE).
- Five HGV/trailer bays for biomethane and CO₂ transport operations.
- A 70 m internal access road providing extensive queuing capacity, preventing any stacking on Ashton Road.

Wiltshire Highways confirm that both the number and arrangement of parking spaces are acceptable and compliant with standards. Cycle parking is not explicitly shown; however, given the rural context, absence of footways or cycle infrastructure, very low staffing levels and the nature of the use, this is not considered a material omission in policy terms.

Officer judgement: The development provides appropriate parking and internal circulation in accordance with CP64 and the Wiltshire LTP.

Sustainable Transport Considerations

The rural context limits realistic opportunities for walking and cycling. However:

- Staff numbers are very low.
- Feedstock is sourced locally, reducing unnecessary transport miles.
- HGV routing avoids unsuitable minor roads.
- Traffic management measures will be secured during construction.

Given the operational nature of the use and geographical context, the proposal represents a proportionate and reasonable response to sustainable transport policy.

Officer judgement: The proposal aligns with NPPF para. 117 and WCS CP60–61 in balancing sustainable transport aspirations with functional rural requirements.

Third-Party Representations

Concerns have been raised relating to:

- HGV volumes
- Highway safety
- Traffic impacts on rural lanes
- Cumulative effects with other developments

These concerns have been carefully considered. The professional evidence, together with the response from Highways, confirms:

- The access is safe and suitable
- Traffic impacts do not approach “severe”
- Construction impacts can be fully controlled by a CMP
- Routing can avoid unsuitable minor lanes

As such, while public concerns are understandable, they do not indicate impacts that would justify refusal under national or local policy.

Cumulative Development

No other committed or consented developments have been identified that would materially alter this conclusion on cumulative highway impact.

Conclusion

The proposed development provides a safe and suitable access, appropriate internal layout and parking, and would not result in an unacceptable impact on highway safety or a severe residual cumulative impact on the transport network. Traffic levels associated with both construction and operation can be appropriately managed through routing, timing and

construction management controls, and necessary safeguards, including access construction details, visibility splays, Construction Management Plan and condition surveys, can be secured by condition.

The proposal therefore complies with NPPF paragraphs 110–117, Core Policies 60–64 of the Wiltshire Core Strategy, Policies WDC1 and WDC11 of the Waste Development Control Policies DPD, and the relevant transport policies of the Ashton Keynes Neighbourhood Plan.

6.11 Ecology and Biodiversity

Policy Context

The NPPF identifies areas of particular importance to be protected, as set out in Footnote 7 to paragraph 11, including irreplaceable habitats and Sites of Special Scientific Interest.

Chapter 15 of the NPPF (*Conserving and Enhancing the Natural Environment*) requires developments to minimise impacts on biodiversity and deliver net gains, including through coherent and resilient ecological networks and features that support priority species (Paragraph 187). Paragraphs 193–194 set out principles for determining applications, and Paragraph 195 confirms that the presumption in favour of sustainable development does not apply where a plan or project is likely to have a significant effect on a habitats site unless an appropriate assessment concludes no adverse effect on integrity.

Legislation now requires all major developments submitted since February 2024 to deliver a minimum 10% Biodiversity Net Gain (BNG), in line with the Environment Act 2021.

Core Policy 50 (Wiltshire Core Strategy) seeks to conserve and enhance biodiversity, requiring development to avoid harm to ecological assets and deliver measurable net gain.

The Council's *Green & Blue Infrastructure Strategy (2022–2030)* provides a framework for habitat connectivity, ecosystem services, and nature recovery.

Policy WDC8 of the Waste Development Control Policies DPD requires proposals to avoid harm to biodiversity and geological interests, with impacts to be mitigated or compensated only where avoidance is not possible. Development affecting protected species, habitats or designated sites must be supported by appropriate ecological assessment.

Ashton Keynes NP Policy – ENP1 – Biodiversity Protection: Development should minimise impacts on biodiversity and deliver net gains wherever possible. The Parish contains SSSIs, County Wildlife Sites and important ecological networks forming part of the wider Cotswold Water Park landscape.

Links:

[Wiltshire Core Strategy - Wiltshire Council](#)

[National Planning Policy Framework - GOV.UK](#)

[Natural environment - GOV.UK](#)

[Light pollution - GOV.UK](#)

[Biodiversity net gain - GOV.UK](#)

[Appropriate assessment - GOV.UK](#)

[Open space, sports and recreation facilities, public rights of way and local green space - GOV.UK](#)

Assessment

The Environmental Statement (ES) confirms that the site comprises intensively managed arable land of generally low ecological value, bounded by hedgerows and scattered mature trees, with two shallow ditches present on site. The ES recognises the proximity of the Cotswold Water Park SSSI, which lies approximately 300–350m from the application site on three sides and is designated for its marl lakes, stonewort assemblages, wetland habitats and nationally important breeding and wintering bird populations. The ES concludes that the proposed development will not give rise to significant adverse effects on the SSSI, due to the nature of the development, the lack of hydrological connectivity, the absence of marl-forming lakes or suitable aquatic habitats on site, and the implementation of pollution prevention and surface-water management measures. The ES further reports that typical farmland birds, foraging bats and common terrestrial fauna may utilise the site at low levels, with no evidence of notable populations or species of high conservation concern.

The ES confirms that impacts to retained hedgerows, trees and boundary habitats can be avoided through design and mitigation, that light-spill can be controlled to protect commuting/foraging bats, and that habitat enhancements, including hedgerow strengthening, species-rich grassland and biodiversity net gain (BNG) planting, would provide measurable ecological improvements. The ES concludes that no significant residual ecological effects are predicted, either alone or cumulatively, following mitigation.

The ecological surveys undertaken (2023 Preliminary Ecological Appraisal, bat surveys, wintering and breeding bird surveys, and the 2025 updated ecological assessment) confirm that the site supports arable habitat of low ecological value, with boundary hedgerows and occasional mature trees providing the main ecological interest. The surveys recorded moderate foraging and commuting activity by widespread bat species and confirmed the presence of pipistrelle day roosts within one off-site boundary tree previously surveyed. The site provides opportunities for nesting farmland birds (including skylark), small numbers of wintering birds, and low-level use by widespread species such as hedgehog, badger and common reptiles. No evidence of great crested newts, dormice, invasive plants, or other high-value ecological receptors was identified.

The updated 2025 assessment confirms that ecological conditions and species use of the site have not changed materially since the original baseline, and earlier survey results remain valid. Biodiversity Net Gain calculations indicate the potential to deliver a 10%+ net gain through hedgerow enhancement, native tree planting, species-rich grassland, and the off-site mitigation area previously identified for farmland birds. Overall, the surveys identify no ecological constraints that cannot be satisfactorily mitigated.

The comments of Natural England are consistent with the findings of the Environmental Statement and subsequent ecological updates, which conclude that the site itself is of low intrinsic ecological value and that there is no direct hydrological connectivity between the

application site and the marl lakes and wetland habitats for which the SSSI is designated. The proposed mitigation measures, including pollution prevention, SuDS, and emergency incident controls, are considered sufficient to ensure that the development would not result in significant adverse effects on designated sites or protected species.

Wiltshire Council's Ecologist has reviewed the submitted ecological information alongside Natural England's advice and raises no objection, subject to conditions securing the recommended mitigation, monitoring and long-term management measures.

Third parties have expressed concerns regarding the site's proximity to the Cotswold Water Park SSSI, noting that the development lies within 300–350m of the designated lakes, less than the 500m buffer advised by the Environment Agency in some circumstances. Concerns were raised that the site lies within a Groundwater Source Protection Zone 2 and a Nitrate Vulnerable Zone, and that any pollution incident could harm the rare marl-forming lake system, stonewort species, and the wider SSSI ecology. Representations also raised concerns about potential impacts on protected species, disturbance to wildlife, and the loss of farmland bird habitat. All such comments have been fully considered.

Key considerations in the assessment of this application include:

Impact on Designated Sites and Protected Species:

The site comprises intensively managed arable land with hedgerows, mature boundary trees and two dry ditches. These habitats hold limited ecological value, although hedgerows and boundary trees provide locally important features for bats, nesting birds and general wildlife. The development avoids direct loss of high-value habitats and incorporates mitigation to protect retained hedgerows and trees, including a 5m buffer, root-protection measures and a sensitive lighting scheme. The ES demonstrates that the Cotswold Water Park SSSI will not be adversely affected: there is no surface-water connection to the marl lakes; the site is hydraulically contained; and pollution-prevention and SuDS measures will control runoff risk. Noise and visual disturbance effects are considered minor, and the agricultural nature of the site means it does not contribute significantly to the SSSI's notified interest features, with farmland birds recorded in low numbers.

On this basis, the competent authority can be satisfied that the proposal would not be likely to have a significant effect on the Cotswold Water Park SSSI, either alone or in combination, and that no Appropriate Assessment under the Habitats Regulations is required.

The development incorporates appropriate mitigation for bats, breeding and wintering birds and general fauna, including timing restrictions, precautionary working methods and habitat creation. The surveys identify that the site provides limited but occasional use by farmland birds, including skylark, at low densities. In order to address this impact, the applicant has committed to off-site farmland bird mitigation through a Unilateral Undertaking, securing habitat management measures designed to benefit red and amber listed species. While this mitigation is discussed in detail within the Section 106 / planning obligations section of this report, it is noted here that the approach is consistent with the mitigation hierarchy and contributes positively to local and strategic biodiversity objectives.

Furthermore, Policy WDC8 requires the avoidance, mitigation or compensation of impacts on biodiversity and geological interests. As stated above, the submitted ecological assessments indicate that, subject to mitigation and management measures, the development would not result in significant harm to protected species or priority habitats. With appropriate conditions securing mitigation and biodiversity enhancements, the proposal is considered compliant with Policy WDC8.

Delivery of Biodiversity Net Gain:

The Biodiversity Net Gain assessment demonstrates the ability to exceed the statutory 10% requirement, in accordance with the Environment Act 2021, through hedgerow enhancement, woodland edge planting, species-rich grassland and habitat creation.

Habitat Connectivity and Green Infrastructure:

The scheme also contributes to the Council's Green & Blue Infrastructure Strategy by strengthening ecological connectivity and improving boundary habitats.

Summary

Taking account of Natural England's advice, the conclusions of the Environmental Statement, and the absence of objection from the Council's Ecologist it is considered that the proposal would not result in unacceptable harm to biodiversity or designated ecological sites and is therefore acceptable in ecological terms. Subject to conditions securing the CEMP, drainage and pollution controls, bat-sensitive lighting, Biodiversity Net Gain delivery, and long-term habitat management, together with the off-site farmland bird mitigation secured via the Unilateral Undertaking, the proposal complies with NPPF Chapter 15, Core Policy 50, Policy WDC8, and the statutory Biodiversity Net Gain regime.

6.12 Flood Risk and Drainage

Policy Context

Chapter 14 of the NPPF requires planning decisions to ensure that development is directed to areas of lowest flood risk (Sequential Test) and that flood risk is not increased elsewhere. Paragraphs 170–182 require site-specific Flood Risk Assessments (FRAs) where appropriate and expect development to incorporate:

- Sustainable drainage systems (SuDS)
- Flood resistance and resilience measures
- Safe exceedance routing
- Pollution prevention and surface water controls
- No increase in off-site flood risk

Core Policy 67 of the Wiltshire Core Strategy requires development to manage flood risk sustainably, avoid increasing risk elsewhere, and incorporate SuDS unless inappropriate.

Policy WDC3 of the Waste Development Control Policies DPD requires waste-related development to protect groundwater, surface waters and drainage systems, and to demonstrate that flood risk is properly mitigated.

Ashton Keynes Neighbourhood Plan Policy INP1 requires development to avoid increasing local flood risk and to incorporate SuDS, reflecting local concerns linked to the Upper Thames Basin and high groundwater characteristics.

Assessment

Flood Zone Compatibility and Sequential Test

The site lies within Flood Zone 1, the lowest category of fluvial flood risk. Under NPPF criteria, such locations are appropriate for all types of development and satisfy the Sequential Test, with no requirement to consider alternative sites at lower flood risk. The Exception Test does not apply.

This establishes the site as acceptable in principle with regard to national flood-risk policy.

Surface Water Management and Drainage Strategy

Although fluvial risk is low, surface water management is a key consideration due to:

- Localised overland flow routes
- A low point near the site entrance
- Sensitivity of the wider Cotswold Water Park hydrological system

The drainage strategy adopts a SuDS-led approach, incorporating:

- A large attenuation tank (~1,529 m³)
- A wetland lagoon providing settlement and water-quality treatment
- Controlled discharge rates achieving 20% betterment against greenfield runoff
- Lined, impermeable surfacing beneath digestate handling areas
- Defined exceedance routing to prevent uncontrolled overland flow
- Pollution containment measures (bunding, sealed hardstanding, impermeable lagoon linings)

Updated technical submissions (2023–2025) addressed initial LLFA concerns regarding greenfield runoff calculations, water-quality modelling, exceedance plans, ditch maintenance and construction-phase pollution control.

Following these revisions, the LLFA confirmed no objection, subject to conditions securing final drainage details and SuDS maintenance provisions. The Environment Agency also issued no objection, noting that groundwater, odour and emissions safeguards will be regulated through the separate Environmental Permit.

The drainage strategy has also been designed with appropriate allowances for climate change and incorporates safe exceedance routing to ensure resilience during extreme rainfall events.

Officer judgement: The proposed SuDS and pollution-control measures are robust, policy-compliant and appropriate to the site's context.

Pollution Prevention and Water Environment Protection

Given the nature of AD operations, third-party representations have raised concerns regarding potential digestate spills reaching nearby ditches, lakes and ultimately the River Thames.

The scheme includes multiple layers of containment:

- Bunded, impermeable hardstanding
- Lined lagoons and sealed drainage
- Separate “clean” and “dirty” water systems
- Controlled runoff pathways directing water to treatment
- No direct hydrological connectivity between operational areas and Water Park lakes

The EA's no-objection response confirms that the drainage and containment design is capable of preventing contamination in flood and exceedance scenarios, with operational controls further regulated through the Environmental Permit.

Officer judgement: Pollution-pathway risks have been satisfactorily mitigated through design and can be further managed through enforceable planning and permitting controls.

Third-Party Representations

Concerns raised relate to:

- Localised flooding at the Ashton Road entrance
- Perceived vulnerability of low-lying parts of the site
- Risk of digestate leakage into the Water Park
- Adequacy of emergency procedures in extreme rainfall

These concerns have been carefully considered. The technical evidence demonstrates that:

- The access area can be drained safely via SuDS infrastructure
- Exceedance flows are directed away from the highway
- Containment systems manage pollution risk
- Flood risk on and off site is reduced compared with the existing agricultural baseline
- Emergency response and spill-control measures will be regulated through the Environmental Permit

Officer judgement: While local concerns are understandable, the evidence does not indicate unacceptable residual risk.

Conclusion

The proposal is located in Flood Zone 1 and therefore meets the Sequential Test. The Exception Test is not required. The submitted FRA, SuDS strategy and subsequent revisions demonstrate that:

- Surface water will be managed sustainably
- Runoff rates will achieve 20% betterment over the existing situation
- Pollution pathways are appropriately contained
- Flood risk on-site and off-site will not increase as a result of the development.

The LLFA and Environment Agency both confirm no objection, subject to standard drainage and construction-phase conditions.

The proposal therefore complies with NPPF Chapter 14, Core Policy 67, Policy WDC3 of the Waste DPD, and INP1 of the Ashton Keynes Neighbourhood Plan.

6.13 Other Issues

A number of additional matters have been raised through third-party representations which are not addressed in detail elsewhere in this report.

Concerns have been expressed regarding perceived risks to human health, particularly in relation to nearby schools and children. These concerns are acknowledged; however, health impacts are a material planning consideration where they are evidenced through technical assessment and the advice of statutory consultees. In this case, matters relating to air quality, odour, noise and emissions have been assessed through the Environmental Statement and Addendum, and reviewed by the Environment Agency and the Council's Public Protection team, neither of whom raise an objection subject to appropriate controls being secured by condition and environmental permitting.

Representations have also raised concerns about emergency planning, accident scenarios and evacuation procedures in the event of a major incident. The likelihood and management of such events fall primarily within the scope of the Environmental Permitting Regulations and health and safety legislation. Nevertheless, accident risk has been considered in planning terms through the Environmental Statement, which concludes that the risk of major incidents is low.

Some objectors have questioned the credibility, geographic origin or coordination of letters of support submitted in favour of the application. The planning system does not attribute weight based on the number, origin or perceived coordination of representations received. Each representation has been considered on its planning merits, with weight afforded to the substance of material planning considerations rather than the volume of support or objection.

A range of matters raised through consultation, including impacts on property values, general anxiety about the proposal, perceived fairness of energy distribution, and the commercial interests of individual tourism operators, are not material planning considerations and cannot be taken into account in determining the application.

Accordingly, while all representations have been carefully considered, the issues raised under this heading do not identify additional material planning grounds that would alter the assessment, planning balance or conclusions reached elsewhere in this report.

6.14 Pre-commencement Condition Agreement

This recommendation includes pre-commencement planning condition(s) relating to construction and ecological management, landscape and ecological management, construction method, a low emission travel plan, archaeological investigations, surface water drainage and access details. In accordance with Section 100ZA of the Town and Country Planning Act 1990 and the Town and Country Planning (Pre-commencement Conditions) Regulations 2018, the Local Planning Authority formally notified the applicant/agent of the proposed condition(s) and sought their agreement. Written confirmation of agreement was received from the applicant's agent on 09/04/26.

6.15 S106 Heads of Terms

Wiltshire Council's Planning Obligations Supplementary Planning Document (SPD), when read alongside Core Policy 3 (Infrastructure Requirements) of the Wiltshire Core Strategy and the adopted CIL Charging Schedule, sets out the circumstances in which planning obligations will be required to make development acceptable in planning terms.

Regulation 122 of the Community Infrastructure Levy (CIL) Regulations 2010 (as amended) and paragraph 58 of the NPPF confirm that any planning obligation must meet all three statutory tests:

1. Necessary to make the development acceptable in planning terms;
2. Directly related to the development; and
3. Fairly and reasonably related in scale and kind.

For rural sites, the SPD identifies ecological mitigation as a form of site-specific infrastructure that can be appropriately secured through a planning obligation where on-site mitigation alone cannot address identified impacts.

The Waste Development Control Policies DPD also emphasise (notably in WDC1 and WDC2) the need for development to avoid or mitigate environmental impacts, including those on biodiversity interests, where required.

The Council's Ecology Team have advised that skylark mitigation is required in order to avoid significant adverse effects on this priority farmland bird species. The mitigation land identified by the applicant lies outside the red line but within the applicant's wider blue line landholding. Because the mitigation is off-site in planning terms, it cannot lawfully be secured solely by condition.

A planning condition cannot lawfully require works on land outside the red-line application site where that land does not form part of the planning unit. Although the land falls within the blue

line, it still lies outside the red line planning unit, and a condition would therefore fail the tests of precision, enforceability and necessity. This position is consistent with established case law and the Council's SPD.

Accordingly, a Unilateral Undertaking is required to secure:

- delivery of skylark plots / habitat enhancement in the identified field(s);
- timing and phasing of implementation;
- long-term management and monitoring; and
- access rights for the Council to enforce the obligation if required.

The Ecology Team have confirmed that without secured skylark mitigation, the proposal would result in an unacceptable adverse ecological impact. As a result, without the obligation:

- the development would fail to comply with Core Policy 50,
- would not meet the NPPF biodiversity requirements, and
- would lead to an ecology-based reason for refusal.

The S106 obligation therefore meets all three CIL Regulation 122 tests:

- Necessary – essential to make the development acceptable;
- Directly related – the impact arises solely from the development on skylark territories;
- Fairly and reasonably related in scale and kind – the extent and location of mitigation is proportionate to the scale of the impact.

No other contributions have been identified as necessary by consultees, and there are no additional infrastructure requirements that fall outside the scope of conditions.

Community Infrastructure Levy

The Community Infrastructure Levy (CIL) is a charge that local authorities in England and Wales can put on new development in their area to raise funds to help deliver the infrastructure necessary to support development. This development does not represent chargeable development under the Community Infrastructure Levy Regulations 2010 (as amended) and Wiltshire Council's CIL Charging Schedule.

7. PLANNING BALANCE

The planning balance must be informed by the detailed assessment set out above, which concludes that, subject to planning conditions and the completion of a planning obligation, the proposal is acceptable in respect of highways, residential amenity, ecology, flood risk, heritage, pollution control and agricultural land policy, with no unacceptable residual harm identified in these respects. No statutory consultee maintains an objection to the proposal other than on landscape grounds.

At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development. In this case, the proposal falls to be determined in accordance with section 38(6) of the Planning and Compulsory Purchase Act 2004, having regard to the

development plan and all other material considerations. The following planning balance therefore weighs the identified benefits of the proposal against the identified harms to determine whether the proposal accords with the development plan when read as a whole.

This section therefore weighs the identified benefits of the proposal against the identified harm in order to assess whether the development accords with the development plan when read as a whole, or whether other material considerations justify approval.

Benefits of the Proposal

Economic Growth and Employment

The proposal would generate approximately 100 FTE jobs during the construction phase, around 15 FTE operational jobs, and an estimated 35 indirect and supply-chain roles. This would support the green energy sector and contribute to local and regional economic activity. This aligns with NPPF paragraphs 85–87, which support sustainable economic growth and productivity.

- **Benefit:** Creation of new employment opportunities and economic investment in the local area.
- **Weight:** Significant weight

Renewable Energy Generation, Decarbonisation and Associated Improvements to Energy Security

The development would generate approximately 10 million m³ of renewable, low-carbon biomethane annually, sufficient to meet the gas demand of around 9,300 homes. It would deliver substantial carbon savings of approximately 29,801 tCO₂e per year, making a meaningful contribution to decarbonisation, climate resilience and national energy security. Paragraph 168 of the NPPF states that decision makers should give significant weight to the benefits of renewable and low-carbon energy development.

- **Benefit:** Decarbonisation, renewable energy generation and energy security
- **Weight:** Significant weight.

Support for the Local Farming Economy and Circular Agricultural Practices

Paragraph 88 of the NPPF requires planning decisions to enable the sustainable growth and diversification of agricultural businesses, including through new rural economic development. This places a positive policy expectation on supporting schemes that genuinely strengthen the functioning and resilience of the rural economy. In this case, the development would provide integrated support for the local farming community by recycling 91,000 tonnes per annum (tpa) of agricultural by-products, supplying around 120,000 tpa of natural digestate to improve soil health and crop yields, and offering long-term, stable income streams to farms through feedstock supply agreements. Together, these measures reduce reliance on imported artificial fertilisers, lower farm input costs, and help sustain farm businesses at a time of structural change and declining livestock numbers.

- **Benefit:** Support for the local farming economy and circular agricultural practices

- **Weight:** More than moderate weight.

Biodiversity Net Gain

The proposal would deliver a habitat biodiversity net gain of 20.33% and a hedgerow net gain of 72.18%, both substantially exceeding the statutory requirement of 10%.

- **Benefit:** Significant deliver of BNG.
- **Weight:** Moderate weight.

Identified Harms

Landscape and Visual Impact

In landscape terms, the proposal would give rise to a degree of localised landscape and visual harm arising from the introduction of large-scale infrastructure and engineered landform into an open countryside setting. This harm is reflected in the ongoing objection from the Council's Landscape Officer and is afforded moderate weight in the planning balance.

However, this harm must be considered in its proper context. The site does not lie within a nationally designated landscape; the assessed effects are localised; and the wider landscape is already influenced by mineral workings, infrastructure, leisure uses and utilitarian development. The proposal has undergone extensive design evolution, including reduced massing and a comprehensive landscape strategy, which would materially reduce visual effects over time. In addition, the development is expressly temporary, with decommissioning and restoration secured by condition.

On this basis, while the landscape harm is acknowledged and carries moderate weight it is not considered, either individually or cumulatively, to amount to a strong or overriding reason for refusal when assessed against the development plan and national policy taken as a whole.

- **Harm:** Localised erosion of rural character and visual intrusion
- **Weight:** Moderate weight

Loss of Agricultural Land

The proposal would result in the permanent loss of approximately 6.99 ha of Grade 3 agricultural land. As the available Agricultural Land Classification data does not distinguish between Grades 3a and 3b, the land has been treated cautiously as potential best and most versatile agricultural land. This loss therefore represents a material planning harm and is afforded moderate weight in the planning balance.

However, the site lies within a wider agricultural landscape where land of similar quality is widespread, and there is no evidence that the site represents an unusually high-quality parcel or that the proposal would undermine the long-term viability of the holding. In addition, Policy WDC2 of the Waste Development Control Policies DPD allows for the loss of agricultural land, including potential BMV land, where this is justified by overriding sustainability considerations.

In this case, the agricultural land loss is directly balanced by substantial countervailing benefits, including support for local farm businesses, provision of digestate to improve soil

health and reduce reliance on artificial fertilisers, and the generation of renewable, low-carbon energy contributing to climate change mitigation and energy security. On this basis, the agricultural land loss, while acknowledged and afforded moderate weight, is considered justified and outweighed by the benefits of the proposal.

- **Harm:** Permanent loss of Grade 3 (potential BMV) agricultural land
- **Weight:** Moderate weight

Neutral Impacts

The following matters are considered policy-compliant and acceptable, and are therefore afforded neutral weight in the planning balance:

- Highway safety and traffic impacts
- Residential amenity
- Ecological impacts
- Drainage and flood risk
- Impact on above and below-ground heritage assets
- Pollution control

Links:

[Wiltshire Core Strategy - Wiltshire Council](#)

[National Planning Policy Framework - GOV.UK](#)

8. CONCLUSION

When weighed in the round, the identified landscape harm, while a material planning consideration and afforded moderate weight, is not considered to outweigh the substantial benefits of the proposal in respect of renewable energy generation, climate change mitigation, energy security, agricultural sustainability and biodiversity net gain. Other identified harms, including the loss of agricultural land, have been carefully considered and are similarly assessed as acceptable and outweighed in the planning balance. Subject to the imposition of appropriate planning conditions and completion of the required planning obligation, no material considerations have been identified that would justify refusal of the application.

RECOMMENDATION: That planning permission be **GRANTED**, subject to delegation to the Head of Development Management for the completion of a Section 106 agreement legal agreement covering the matters set out in this report section 6.15, and subject also to the planning conditions listed below:

TIME LIMIT

The development hereby permitted shall be begun within three years from the date of this permission.

REASON: To comply with the provision of Section 91 of the Town and Country Planning Act 1990 as amended by Section 51 of the Planning and Compulsory Purchase Act 2004

APPROVED PLANS

The development hereby permitted shall be carried out in accordance with the following approved plans and documents:

- AKE-0002: Site Location
- 29419/F101 Rev A: Site Layout for Planning
- 29419/P2/101 Rev P03: Site Layout Plan Sheet 1 of 2
- 29419/P2/101 Rev P03: Site Layout Plan Sheet 2 of 2
- 29419/F106 Rev A: 33m Dia. Dome Fermentor Tank – Plans, Section and Elevations as Proposed
- 29419/F107 Rev A: 45m Dia. Fermentor Tank, 9m High – Plans, Section and Elevations as Proposed
- 29419/P2/104 Rev P01: Attenuation Tank Sections
- 29419/F110 Rev A: Separator Building – Plans as Proposed
- 29419/F111 Rev A: Separator Building – Sections and Elevations as Proposed
- 29419/F104 Rev D: Manure Processing Building – Plans as Proposed
- 29419/F105 Rev C: Manure Processing Building Sections and Elevations as Proposed
- 29419/F108 Rev A: Straw Bunker Building – Plans as Proposed
- 29419/F109 Rev A: Straw Bunker Building – Elevations as Proposed
- 29419/P/2022 Rev A: Silage Clamp Sections and Details
- 29419/P2/106 Rev P01: Drainage Details Sheet 1 Clean Water Details
- 29419/P2/107 Rev P01: Drainage Details Sheet 2
- 29419/P2/108 Rev P01: Drainage Details Sheet 3
- 29419/P2/105 Rev P01: Site Drainage Catchment Plan 1 of 2
- 29419/P2/105 Rev P02: Site Drainage Catchment Plan 2 of 2
- 29419/P2/102 Rev P02: Proposed Levels
- 29419/P/2016 Rev A: Fencing and Gate Details
- 29419/P2/101 Rev P01: Hard/Soft Landscape Plan Sheet 1 of 2
- 29419/P2/101 Rev P02: Hard/Soft Landscape Plan Sheet 2 of 2
- 29419/F112 Rev A: Liquid Storage Tanks – Plans, Section and Elevations as Proposed
- 29419/F102 Rev C: Site Sections as Proposed
- 29419/F103 Rev C: Site Elevations as Proposed
- 29419/P2/150 Rev P02: Site Enclosure Plan Sheet 1 of 2
- 29419/P2/150 Rev P02: Site Enclosure Plan Sheet 2 of 2
- 29419/P/116 Rev B: Welfare Office External Layout
- 29419/P/115 Rev B: Welfare Office Internal Layout
- 29419/P2/109 Rev P01: Proposed Section Through Wetland and Weir
- 29419/F115 Rev B: Elevation Views – Previous and New Planning Scheme
- P24-1022_EN_010_B_A1L: Landscape Strategy Plan

REASON: For the avoidance of doubt and in the interests of proper planning.

DECOMMISSIONING PLAN

Within 25 years of the date on which the anaerobic digestion facility first becomes operational (being the date on which feedstock is first processed on site), or if the development ceases operation for a continuous period of 12 months, whichever is the sooner, the development shall be decommissioned and the land returned to its former use (agricultural). All structures, plant and equipment shall be dismantled and any hard surfaced areas broken up. All materials from these operations shall be removed from the site. Prior to any works associated with this condition commencing, a scheme setting out the full extent of the proposed works, the retention of any planting/vegetation/water features and the proposed final ground levels, any seeding to be undertaken and a timetable for the completion of all the works shall be submitted to and approved in writing by the local planning authority. The decommissioning works shall be undertaken in accordance with the approved details.

REASON: To safeguard and maintain the visual and residential amenity of the area.

SUBMISSION OF A CEMP

No development shall commence until a Construction Environmental Management Plan (CEMP) has been submitted to and approved in writing by the Local Planning Authority.

The CEMP shall relate solely to the management of environmental impacts during the construction phase and shall include the following:

- a) A description of the development, construction programme and site layout during construction;
- b) Details of site management responsibilities and contact details, including a named site manager and a community liaison contact;
- c) Measures to control construction noise, vibration, dust, mud and other emissions affecting residential amenity;
- d) Measures for the prevention of pollution to land, groundwater and surface waters, including fuel storage, plant refuelling, spill response and waste management;
- e) Measures for managing surface water during construction to prevent flooding and pollution (excluding permanent drainage design);
- f) Ecological protection, avoidance and mitigation measures to be implemented during construction, including protection of designated sites, buffer zones, retained habitats and trees, timing of works, and the role of any Ecological Clerk of Works;
- g) Biosecurity measures to prevent the introduction or spread of invasive species;
- h) Construction working hours, which shall be limited to 0800–1800 Monday to Friday, 0800–1300 Saturdays, with no working on Sundays or Bank Holidays;
- i) A commitment that no burning of materials shall take place on site.

The development shall thereafter be carried out fully in accordance with the approved CEMP for the duration of the construction phase.

REASON: To minimise detrimental effects to the neighbouring amenities, the amenities of the area in general, detriment to the natural environment through the risks of pollution during the construction phase.

LOW EMISSION TRAVEL PLAN

No development shall commence on site until a Low Emission Travel Plan has been submitted to and approved in writing by the Local Planning Authority.

REASON: Core policy 57, Ensuring high design and place shaping such that appropriate levels of amenity are achievable.

ARCHAEOLOGICAL INVESTIGATION

No development shall commence within the area indicated by application PL/2023/03359 until:

- a) A written programme of archaeological investigation, which should include on-site work and off-site work such as the analysis, publishing and archiving of the results, has been submitted to and approved by the Local Planning Authority; and
- b) The approved programme of archaeological work has been carried out in accordance with the approved details.

REASON: To enable the recording of any matters of archaeological interest.

SURFACE WATER DRAINAGE

No development shall commence until a detailed surface water drainage scheme has been submitted to and approved in writing by the Local Planning Authority. The scheme shall accord with the principles set out in the submitted Flood Risk Assessment and shall address all matters identified in the Lead Local Flood Authority's consultation response to the Local Planning Authority dated 6th November 2025 and all relevant matters identified in Natural England's consultation response to the Local Planning Authority dated 11th March 2026. The scheme shall include, but not be limited to:

- Drawings of the overland exceedance flows of the 1 in 100year plus climate change rainfall event that minimise the risk to people and property.
- Submit calculations which demonstrate that the proposed drainage design provides a sufficient level of water treatment to prevent pollution of the receiving watercourse.
- Provide information on whether the existing drainage ditches onsite will be maintained, utilised, or how they will be impacted post-development as shown in Figure 2-4 in the Flood Risk Assessment.
- Provide a construction management plan which mitigates pollution to groundwater and adjacent watercourses, while mitigating flood risk to people and property.
- Submit clear arrangements for the ownership and ongoing maintenance of the proposed drainage system (including SuDS features)
- Design and delivery of site drainage infrastructure that ensures there are no adverse water quality impacts on the Cotswold Water Park SSSI.

The development shall be carried out in accordance with the approved details prior to occupation and maintained thereafter.

REASON: To ensure the development provides an appropriate surface water drainage strategy that manages flood risk and water quality.

ACCESS DETAILS

Prior to commencement of development full construction details of the proposed access arrangement, in broad compliance with Drawing 29419/P/101 Rev G, shall be submitted to and approved by the Local Planning Authority. The access shall be constructed prior to the construction of any part of the AD facility.

REASON: To ensure a safe and sufficient access is provided in the interests of highway safety.

PROVISION OF VISIBILITY SPLAYS

No development, other than the formation of the access, shall commence on site until visibility splays have been provided between the edge of the carriageway and a line extending from a point 2.4 metres back from the edge of the carriageway, measured along the centre line of the access, to the points on the edge of the carriageway 160metres to the north and south from the centre of the access in accordance with the approved plans. Such splays shall thereafter be permanently maintained free from obstruction to vision above a height of 900mm above the level of the adjacent carriageway.

REASON: In the interests of highway safety.

CONSTRUCTION METHOD STATEMENT

No development shall commence on site (including any demolition or site clearance works) until a Construction Method Plan (CMP) has been submitted to and approved in writing by the Local Planning Authority.

The CMP shall relate solely to construction traffic and site access arrangements and shall include:

- a) A Construction Traffic Management Plan, including temporary signage;
- b) An HGV routing plan to and from the site;
- c) Details of the number, size and frequency (daily and weekly) of construction and delivery vehicles;
- d) Details of staff vehicle movements and on-site parking arrangements during construction;
- e) Measures to mitigate the impact of construction traffic on the local highway network;
- f) Arrangements for keeping vehicle movement logs and making them available to the Local Planning Authority upon request;
- g) A pre-construction highway condition survey and post-construction survey of the affected highway sections, in accordance with the requirements of the Highway Authority.

The approved CMP shall be adhered to for the duration of the construction period unless otherwise agreed in writing by the Local Planning Authority.

REASON: To minimise detrimental effects to highway safety, during the construction phase.

PARKING AND TURNING

No part of the development hereby permitted shall be first brought into use until the access, turning area and parking spaces have been completed in accordance with the details shown on the approved plans. The areas shall be maintained for those purposes at all times thereafter.

REASON: In the interests of highway safety.

LANDSCAPE AND ECOLOGY MANAGEMENT PLAN (LEMP)

Prior to the commencement of development, a Landscape and Ecology Management Plan (LEMP) shall be submitted to and approved in writing by the Local Planning Authority.

The LEMP shall set out the ecological mitigation, compensation and enhancement measures for the development and shall include:

1. Long-term landscape and ecological objectives for the site;
2. Details of habitats to be retained, created and managed, together with management prescriptions and maintenance schedules for a minimum period of 30 years from the commencement of development;
3. A monitoring programme, including measurable performance indicators and target habitat conditions;
4. A mechanism for review and adaptive management where monitoring demonstrates that objectives are not being met; and
5. Details of the party or body responsible for implementation and ongoing management of the LEMP.

The approved LEMP shall be implemented in full in accordance with the approved details.

REASON: To ensure the long-term management of landscape and ecological features retained and created by the development, for the benefit of visual amenity and biodiversity for the lifetime of the scheme.

LANDSCAPE IMPLEMENTATION

All soft landscaping comprised in the approved details of landscaping shall be carried out in the first planting and seeding season following the first operational use of the development or the completion of the development whichever is the sooner; All shrubs, trees and hedge planting shall be maintained free from weeds and shall be protected from damage by vermin and stock. Any trees or plants which, within a period of five years, die, are removed, or become seriously damaged or diseased shall be replaced in the next planting season with others of a similar size and species, unless otherwise agreed in writing by the local planning authority. All hard landscaping shall also be carried out in accordance with the approved details prior to the

first use of any part of the development or in accordance with a programme to be agreed in writing with the Local Planning Authority.

REASON: To ensure a satisfactory landscaped setting for the development and the protection of existing important landscape features.

MEASURES TO PROTECT SSSI IN THE EVENT OF A FIRE, EXPLOSION, OR OTHER ENVIRONMENTAL INCIDENT ON SITE

The development shall be carried out in accordance with the measures as set out in the Acorn Bioenergy letter, *Response to Natural England's Information Request – 23 May 2025*, to ensure that no water quality impacts arise in the event of a fire, explosion, or other environmental incident on site.

REASON: To protect SSSI in the event of a fire, explosion, or other environmental incident on site.

TREE PROTECTION

No demolition, site clearance or development shall commence on site, and; no equipment, machinery or materials shall be brought on to site for the purpose of development, until the Tree Protection Measures have been put in place as set out in the Arboricultural Development Statement by SLR Consulting Ltd and dated February 2023.

The protective fencing shall be erected in accordance with the approved details. The protective fencing shall remain in place for the entire development phase and until all equipment, machinery and surplus materials have been removed from the site. Such fencing shall not be removed or breached during construction operations.

No retained tree/s shall be cut down, uprooted or destroyed, nor shall any retained tree/s be topped or lopped other than in accordance with the approved plans and particulars. Any topping or lopping approval shall be carried out in accordance British Standard 3998: 2010 "Tree Work – Recommendations" (or any subsequent revision or replacement thereof) or arboricultural techniques where it can be demonstrated to be in the interest of good arboricultural practice.

If any retained tree is removed, uprooted, destroyed or dies, another tree shall be planted at the same place, at a size and species and planted at such time, that must be agreed in writing with the Local Planning Authority.

No fires shall be lit within 15 metres of the furthest extent of the canopy of any retained trees or hedgerows or adjoining land and no concrete, oil, cement, bitumen or other chemicals shall be mixed or stored within 10 metres of the trunk of any tree or group of trees to be retained on the site or adjoining land.

[In this condition "retained tree" means an existing tree which is to be retained in accordance with the approved plans and particulars; and paragraphs above shall have effect until the

expiration of ten years from the first occupation or the completion of the development, whichever is the later].

REASON: The application contained insufficient information to enable this matter to be considered prior to granting planning permission and the matter is required to be agreed with the Local Planning Authority before development commences in order that the development is undertaken in an acceptable manner, to enable the Local Planning Authority to ensure the retention of trees on the site in the interests of visual amenity.

FEEDSTOCK RESTRICTION (AGRICULTURAL AD ONLY)

The anaerobic digestion facility hereby approved shall operate using agricultural feedstocks including agricultural wastes (including livestock and poultry manures and slurries) and residues (including straw) and crops suitable for the purpose of anaerobic digestion.

No feedstock classified as non-agricultural waste, including but not limited to food waste or catering waste, shall be imported to or processed at the site at any time.

REASON: To ensure the development is operated as an agricultural anaerobic digestion facility as assessed, to justify its countryside location, and to protect the amenities of nearby residential properties, in accordance with the development plan and national planning policy.

NOISE MANAGEMENT

The development hereby permitted shall be carried out in full accordance with the submitted Noise Assessment (dated March 2023, SLR), including the incorporation of all embedded mitigation measures, such as proprietary acoustic attenuation and CHP stack silencers, prior to the commencement of the relevant operations. The approved mitigation measures shall thereafter be retained and maintained for the lifetime of the development.

The rating level of noise from the development, as assessed in accordance with BS 4142:2014+A1:2019, shall not exceed that predicted in the submitted Noise Assessment at the nearest noise-sensitive receptors.

REASON: To ensure the mitigation measures are implemented and to ensure that noise from the development does not give rise to unacceptable impacts on residential amenity, in accordance with the approved assessment.

EXTERNAL LIGHTING

Prior to the installation of any external lighting, a detailed external lighting scheme shall be submitted to and approved in writing by the Local Planning Authority. Works shall subsequently proceed in accordance with any such approved details, with the approved lighting strategy maintained for the lifetime of the development.

The plans will be in accordance with the appropriate Environmental Zone standards set out by the Institution of Lighting Professionals (ILP) Guidance Notes on the Avoidance of

Obtrusive Light (GN 01/2021) and Guidance note GN08/23 “Bats and artificial lighting at night”, issued by the Bat Conservation Trust and Institution of Lighting Professionals.

REASON: To prevent disturbance to protected species and to avoid unnecessary light spill above and outside of the development site.

POLLUTION PREVENTION AND CONTAINMENT

The development hereby approved shall be carried out and operated in full accordance with the pollution prevention, containment and water management measures set out in Chapter 3 (Project Description) and Chapter 6 (Hydrology and Hydrogeology) of the submitted Environmental Statement, including the use of bunded containment, impermeable surfacing, sealed drainage systems, lined and covered digestate storage lagoons, and separation of clean and contaminated water systems.

No part of the development shall be brought into operation until all approved containment and drainage infrastructure has been installed and made fully operational.

REASON: To prevent pollution of the water environment, in the interests of environmental protection.

UNEXPECTED CONTAMINATION

In the event of unexpected contamination being identified, all development on the site shall cease until such time as an investigation has been carried out and a written report submitted to and approved by the Local Planning Authority, any remedial works recommended in that report have been undertaken and written confirmation has been provided to the Local Planning Authority that such works have been carried out. Construction shall not recommence until the written agreement of the Local Planning Authority has been given following its receipt of verification that the approved remediation measures have been carried out.

REASON: To ensure that any unexpected contamination is appropriately managed in the interests of human health and the environment.

INFORMATIVES TO APPLICANT

Highways

The applicant should note that the upgrading of the access will require the approval of the Highway Authority. The applicant should make early contact with the Vehicle Access Team to establish if the construction can be completed under a S184 licence. Contact vehicleaccess@wiltshire.gov.uk and/or 01225 713352 or visit their website at <http://wiltshire.gov.uk/highways-streets>

Planned mitigation measures may typically include the carrying out of an initial dilapidation survey of the existing road network, followed by planned and frequent inspections and commitment to address site created degradations.

The application involves an extension to the existing/creation of a new vehicle access/dropped kerb. The consent hereby granted shall not be construed as authority to carry out works on the highway. The applicant is advised that a licence will be required from Wiltshire's Highway Authority before any works are carried out on any footway, footpath, carriageway, verge or other land forming part of the highway. Please contact our Vehicle Crossing Team on vehicleaccess@wiltshire.gov.uk and/or 01225 713352 or visit their website at <http://wiltshire.gov.uk/highways-streets> to make an application.

Environment Agency

The following issues will be considered by the Environment Agency as part of the Environmental Permitting process:

- whether the proposed development is located within Source Protection Zone 2 and assess any potential risk to groundwater.
- whether the proposed development is located within 250m of receptors that are sensitive to nuisance odours and assess whether odours can be adequately managed through the use of a closed system and/or appropriate ventilation.
- whether the proposed facility is located close to receptors (workplaces or homes) of a conservation site and consider whether emissions of sulphur dioxide can be controlled to acceptable levels through appropriate mitigation measures.
- whether the proposed facility will store and treat liquid wastes within 10m of a watercourse and consider whether surface run-off can be satisfactorily managed to avoid contamination of the watercourse.

In order to assess the risks identified above, as part of the permitting process the Environment Agency will require:

- Hydrogeological risk assessment
- Dispersion modelling of emissions and impacts

To reduce the risks to people and the environment and obtain a permit:

- the design and/or layout of the buildings may need to change in order to accommodate closed systems to store and treat waste material for the control of odour.
- the design and/or layout of the buildings may need to change in order to accommodate an appropriate location and height for the major emission point(s).
- the design and/or layout of the buildings may need to change in order to accommodate appropriate infrastructure to control surface run-off.
- the design may need to include abatement technology to reduce the impact of the development beyond Best Available Techniques (BAT).

Safeguards should be implemented during the construction phase to minimise the risks of pollution from the development. Such safeguards should cover:

- the use of plant and machinery
- wheel washing and vehicle wash-down
- oils/chemicals and materials
- the use and routing of heavy plant and vehicles
- the location and form of work and storage areas and compounds
- the control and removal of spoil and wastes.

Legal Agreement

This permission shall be read in conjunction with the signed legal agreement dated the ***
***** 2026.

ADDENDUM NOTE – UPDATE TO COMMITTEE

Date of Meeting	21 st April 2026
Application Number	PL/2023/03359
Site Address	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
Applicant	Mr Charlie Lywood
Town/Parish Council	Ashton Keynes CP
Electoral Division	Minety
Type of application	Full Planning
Case Officer	Ruaridh O'Donoghue
Reason for the Application being reported to Planning Committee	Called in due to scale, visual impact, relationship with adjoining properties, design and environmental / highways impact.

RECOMMENDATION: That planning permission be GRANTED, subject to delegation to the Head of Development Management for the completion of a Section 106 agreement legal agreement (or Unilateral Undertaking) covering the matters set out in this report section/paragraphs 6.15, and subject also to the planning conditions.

PURPOSE OF THIS ADDENDUM NOTE

This addendum is provided to update Members on matters raised by the applicant following publication of the Officer's report and to clarify operational controls which were referenced in the report conclusions but not fully reflected in the recommended planning conditions. The matters addressed below do not alter the assessment, balance, or recommendation set out in the main report.

1. OPERATIONAL TRAFFIC CONTROLS – ADDITIONAL CONDITIONS

Background

At page 52 of the Officer's report, it is concluded that both construction and operational traffic associated with the development can be appropriately managed through routing and timing controls secured by condition. While suitable controls were proposed for the construction phase, equivalent conditions controlling operational traffic movements were not expressly included within the recommended condition list.

Following review of the report by the applicant and their agent, this omission has been identified. Officers accept that this was an oversight.

Officer Position

Two additional conditions are therefore recommended to ensure that operational traffic routing and hours of movement are clearly and robustly controlled. These conditions do not introduce new issues, do not change the planning judgement, and do not alter the conclusions of the report. Instead, they serve to strengthen the operational controls on a development that was already considered acceptable in highway and amenity terms.

The conditions align directly with the conclusions already reached in the report and provide additional certainty for local residents and the local highway network.

Recommended Additional Conditions

CONTROL OF HOURS FOR FEEDSTOCK DELIVERY AND EXPORT OF DIGESTATE

Feedstock deliveries to the site and the export of digestate shall only take place between 07:00 and 18:00 hours Monday to Friday and between 07:00 and 13:00 hours on Saturdays, with no such movements on Sundays or Bank Holidays.

Notwithstanding the above, for a period not exceeding 8 weeks in any calendar year, feedstock deliveries which are directly associated with the harvesting of crops may take place between 07:00 and 22:00 hours Monday to Sunday.

A written record of the dates during which the extended hours are used shall be kept by the operator and made available to the Local Planning Authority upon request.

REASON: To control the timing of HGV movements associated with the development in order to protect residential amenity and highway safety.

SUBMISSION OF AN OPERATIONAL TRAFFIC MANAGEMENT PLAN

Prior to the first operation of the development hereby permitted, an Operational Traffic Management Plan (OTMP) shall be submitted to and approved in writing by the Local Planning Authority, in consultation with the Local Highway Authority. The development shall not become operational until the approved OTMP has been implemented, and the development shall thereafter be operated in full accordance with the approved OTMP. The OTMP shall include:

- i. Site access arrangements and on-site traffic management measures;
- ii. Defined HGV routing to and from the site;
- iii. Measures for the scheduling and management of vehicle movements.

Any material variation from the approved OTMP shall be subject to the prior written approval of the Local Planning Authority.

REASON: To ensure that traffic generated by the development is managed in a coordinated and safe manner to minimise impacts on the local highway network and nearby receptors.

Planning Weight

These additional conditions provide greater clarity and enforceability over operational traffic impacts and further reduce any potential effects on residential amenity and highway safety. They are consistent with the report's conclusions and reinforce the acceptability of the scheme.

2. PHOTOMONTAGE AT PAGE 35 – SITE ACCESS SCREENING

The applicant has advised that the photomontage at page 35 of the report shows an earlier view of the site access and does not reflect the more recent establishment of a willow screen. Officers acknowledge this point.

This does not materially alter the landscape or visual assessment within the report, which considered the proposal acceptable subject to existing and proposed mitigation. The presence of additional screening further reinforces that conclusion.

3. AGRICULTURAL LAND USE – TEMPORARY NATURE OF DEVELOPMENT

At pages 41 and 42 of the report, reference is made to the permanent loss of agricultural land. The applicant has correctly noted that the development is proposed on a temporary basis, with restoration to agricultural use secured through a condition requiring a Decommissioning and Restoration Plan.

Officers acknowledge this clarification. When read as a whole, the report already recognises the temporary nature of the permission and the secured restoration of the land. This point does not affect the overall planning balance or recommendation.

4. CONCLUSION

The matters raised by the applicant have been considered by officers. The additional operational traffic conditions are recommended to correct an omission and to ensure that the operational phase of the development is appropriately controlled, consistent with the conclusions already set out in the report.

These updates do not change the substance of the assessment, do not introduce new planning considerations, and do not affect the recommendation, which remains unchanged.