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Via Email: developmentmanagement@wiltshire.gov.uk

13th May 2026

Dear Sir/Madam,

OBJECTION TO PLANNING APPLICATION PL/2026/02266 – PROPOSED DEVELOPMENT OF 9 DWELLINGS IN HEYTESBURY.

The Piscatorial Society formally objects to the above planning application on the grounds that insufficient information has been provided to demonstrate that the proposed foul drainage and sewage treatment arrangements will not adversely affect the River Wylfe and the Hampshire Avon Special Area of Conservation (SAC) and Site of Special Scientific Interest (SSSI).

The River Wylfe forms part of the internationally protected Hampshire Avon SAC and is also part of the Hampshire Avon SSSI. These designations are afforded the highest level of environmental protection under UK law due to the river's exceptional ecological importance and sensitivity to nutrient pollution, particularly phosphorus.

The application proposes a private sewage treatment plant to serve the 9 dwellings. However, the submitted documents do not provide sufficient technical detail regarding:

- The level of phosphate removal to be achieved;
- The discharge concentration limits for phosphorus;
- The long-term operational performance of the treatment plant;
- Monitoring and maintenance arrangements;
- The pathway of treated effluent into the groundwater and aquifer;
- The hydrological connection between groundwater and the River Wylfe;
- Evidence demonstrating nutrient neutrality;
- Evidence that there will be no adverse effect on the integrity of the SAC.

The River Avon SAC, including the Wylfe, is already suffering from excessive nutrient enrichment and eutrophication caused by phosphorus pollution. Natural England's guidance identifies phosphorus as one of the principal threats to the ecological condition of the river system.

Under the Conservation of Habitats and Species Regulations 2017, the competent authority must undertake a Habitats Regulations Assessment (HRA) where a project is likely to have a significant effect on a European protected site, either alone or in combination with other developments. The authority can only lawfully approve the development if it can ascertain beyond reasonable scientific doubt that the proposal will not adversely affect the integrity of the SAC.

In this case, the application fails to provide adequate evidence to satisfy these legal requirements. The absence of detailed phosphate removal specifications and hydrogeological assessment means there is

insufficient certainty regarding the environmental impacts of wastewater discharge on the chalk aquifer and the River Wylfe catchment.

The precautionary principle must therefore apply.

Natural England's nutrient neutrality guidance for the River Avon SAC specifically recognises that additional wastewater from residential development can increase phosphorus loading and adversely affect the SAC unless robust mitigation is secured.

Furthermore:

- Section 28G of the Wildlife and Countryside Act 1981 places a duty on public bodies to further the conservation and enhancement of SSSIs.
- The Environment Act 2021 reinforces duties relating to biodiversity protection and environmental improvement.
- The National Planning Policy Framework (NPPF) states that development likely to have an adverse effect on a protected habitats site should not normally be permitted unless the necessary protections under the Habitats Regulations are satisfied.
- The Water Framework Directive objectives, retained in UK law, require prevention of deterioration in water quality and support achieving favourable conservation status for protected water bodies.

The applicant has not demonstrated:

1. That phosphorus discharge from the proposed treatment plant will be adequately removed;
2. That there will be no hydraulic connectivity to the River Wylfe via the chalk aquifer;
3. That nutrient neutrality can be achieved;
4. That there will be no adverse effect on the integrity of the Hampshire Avon SAC/SSSI.

Without this information, the Local Planning Authority cannot lawfully conclude that the development complies with the Habitats Regulations.

I therefore respectfully request that planning permission is refused unless and until the applicant provides a full and scientifically robust assessment of phosphate impacts, groundwater connectivity, nutrient neutrality calculations, and legally secured mitigation measures sufficient to protect the River Wylfe and the Hampshire Avon SAC/SSSI from further nutrient pollution.

Given the internationally protected status of the river system and the acknowledged sensitivity of the Hampshire Avon catchment to phosphorus enrichment, the current lack of certainty regarding wastewater impacts is unacceptable.

Yours faithfully

Robert G Wellard



Director of Fisheries
The Piscatorial Society