

Objection to PL/2026/04207

Site: Land east of Church Road, Laverstock

To: Becky Jones, Case Officer, Wiltshire Council

From: Peter Millican, [REDACTED]

Date: 15 September 2026

Dear Ms Jones,

Please record this letter and the supporting statement as my objection. I ask the Council to refuse permission on the present evidence. I recognise the housing benefits, including 44 affordable homes, and the earlier 49-dwelling permission. But five matters require particular attention.

1. The drainage authority recommends 'Object'. The Lead Local Flood Authority's (LLFA) response of 27 August 2026 records a holding objection: infiltration has not been demonstrated feasible. Independently, the basin leaves 137 mm freeboard against its stated 300 mm, and its 30-year inputs imply about 32.5 hours to half empty against a 24-hour standard. The Council should obtain the applicant's response and LLFA advice before approval. [DR, pp.1-4; FRA, PDF pp.116-119; SuDS standards, 3.16; sections 2-3.] *See final schedule in the supporting statement for all reference codes.*

2. The phosphorus package depends on that drainage design. The LLFA's alternative is attenuation storage with discharge to a suitable outfall, which cannot inherit the complete-infiltration credit. Without that credit and with other inputs unchanged, the pre-2030 budget rises from 10.96 to 17.28 kg TP/year; permanent mitigation rises from 1.34 to about 5.61 hectares (post-2030 budget: 1.98 to 8.30 kg/year). An alternative may justify some treatment credit, but the Council should assess its performance and secure the land package. [DR, pp.3-4; NN, Tables 4-2 and 5-3; section 2.]

3. The reported junction improvement involves a misleading comparison. The assessment compares 90 minutes without development against 60 minutes with it, cutting off the latter while its queue is still rising. At equal elapsed time, the A30 West queue increases from 21.4 to 24.1 passenger car units (PCU): deterioration, not improvement. Separately, the 2026 morning model uses 359 PCU/hour on Church Road against 511 in its flow diagram. The Council should require corrected comparisons and Highway Authority advice on school-period access and crossing operation. [TA2, PDF pp.7, 50, 53-54, 60 and 65-66; section 5.]

4. The acknowledged landscape harm requires weight. The June appraisal rates the effects on approximately 18 neighbouring properties as "Major/Moderate Adverse" on completion – between the two worst levels on its own scale – and still "Moderate Adverse" after 15 years. This already allows for the proposed screening and planting, so those do not negate the acknowledged harm. Users of Church Road and the Cockey Down access land also face "Moderate Adverse" effects. Yet a second, undated version of these tables rates seven receptors as less sensitive, and adds a column – absent from the appraisal – answering "no" to significance in every case, without explanation. The Council should require the layout, heights and levels to be tested and secure the parameters needed to protect the village setting. [LVA, June 2026 embedded Appendices B-C, PDF pp.55-58; LET; VET; section 6.]

5. The recreation case differs from the earlier permission. The 49-dwelling scheme required no on-site Suitable Alternative Natural Greenspace (SANG), relying on a New Forest mitigation contribution. Here, the only labelled circuit at approximately the cited length – Route A, 2.55 km – lies wholly outside the application site on mapped Cockey Down open-access land, not within the proposed SANG. The Council should assess the linked walks' mitigation value and SSSI effects together, with ecological advice. [AD, paragraphs 21-22; PS, Appendix 1, PDF pp.71-72; WR; section 4.]

Regulation 63(3) requires Natural England consultation; no current response has apparently been supplied. I ask the Council to identify the consultation outcome and address these issues explicitly in the officer's report. I support Councillor Baker's call-in if approval is recommended and ask to be notified of committee and speaking arrangements.

Yours sincerely,

Peter Millican

Supporting statement of objection

Planning application PL/2026/04207

Land east of Church Road, Laverstock, Salisbury SP1 1RB

Proposal: Outline permission, with all matters reserved except access, for up to 110 dwellings, green infrastructure including landscaping and children's play, sustainable drainage and utility buildings.

Applicant: Hallam Land Limited and Velcourt Group Limited

Representor: Peter Millican

Address: [REDACTED]

Date: 15 September 2026

Scope and references. Bracketed sources are listed in the schedule; calculations reproduce supplied evidence, not independent models. At this date, the published application documents contain no response resolving the LLFA objection and no Natural England response. The closing note records what has and has not been checked.

1. Planning context and the earlier permission

A larger proposal, not a reopening of the earlier appeal

- 1.1** The application seeks up to 110 dwellings on a stated 8.33-hectare site. The Planning Statement acknowledges conflict with Core Policies 1, 2 and 23 and the neighbourhood plan's approach to development outside the built-up area. It relies on housing need, accessibility, the earlier permission and its assessment of effects. The policy conflict is relevant, but must be considered in the applicable planning balance. *[PS, Summary paragraphs 1–4 and paragraph 6.14.]*
- 1.2** The 49-dwelling permission is not a template for 110 dwellings. I accept the 2025 decision, which allowed the smaller scheme despite development-plan conflict and subject to specified measures. The present proposal needs its own justification of the infiltration-dependent phosphorus credit and the on-site Suitable Alternative Natural Greenspace (SANG) arrangement not required previously. The land comparison at paragraph 2.5 similarly needs an explained budget; the earlier approval does not settle the present mitigation. *[AD, paragraphs 1, 11–13, 16–29, 30–34 and 40–42; NN, paragraph 1.1.3; PS, Appendix 1, PDF pp.71–72.]*
- 1.3** The increase is up to 61 dwellings. The applicant describes the earlier permission as relating to the western part of the present site. The Council should identify the overlap from the approved plans and compare the additional effects, infrastructure and mitigation. The fallback does not confer permission for the whole present scheme; nor does the former draft allocation for approximately 50 dwellings establish a proven capacity ceiling. *[PS, Summary paragraphs 11 and 13; AD, paragraph 12 and condition 4.]*

Housing benefits

- 1.4** The August 2026 Framework applies to decisions from publication, so this representation does not rely on paragraph 11(d) from the December 2024 Framework, which the Inspector engaged in October 2025 on the basis of the 2.03-year housing-supply figure then recorded. The Council should identify the current position and the basis on which it is calculated. The Housing Enabling Team supports 44 affordable homes, subject to the site being acceptable through the planning process, and seeks a policy-compliant mix secured through a section 106 agreement. That is an important benefit. It does not, however, verify a drainage assumption or supply a missing mitigation commitment. *[NPPF, S3–S5; AD, paragraphs 30 and 40; PS, section 5; HE, pp.1–2.]*

2. River Avon: drainage and nutrient mitigation must be assessed together

The central dependency

- 2.1** The largest credit in the on-site phosphorus calculation – 5.27 kg of total phosphorus (TP)/year – depends on complete infiltration, which the LLFA says has not been demonstrated feasible. It removes all the calculated residential-urban runoff load and about 98% of the total future-land-use load. Natural England’s River Avon SAC nutrient budget calculator, with inputs of 3.19 hectares, 100% flow and 100% removal, underpins mitigation for the River Avon Special Area of Conservation (SAC). Sustainable drainage systems (SuDS) requirements 6.8 and 4.6 require best-practice evidence for biodiversity/nutrient credits and consideration of nutrient-neutrality objectives. National Planning Policy Framework (NPPF) F8(2)(a) expects design in accordance with the national standards; F8(2)(c) requires major proposals to take account of LLFA advice. (The nutrient note’s own paragraph 4.3.1 instead attributes the requirement to Schedule 3 of the Flood and Water Management Act 2010, whose approval regime is not in force in England.) *[DR, p.2; NN, paragraphs 1.1.3, 4.3.1 and 4.3.3, Table 4-2; NC, SuDS!B5:G5 and Nutrients_from_future_land_use!A5:C8; SuDS standards, 4.6 and 6.8; NPPF, F8(2)(a) and (c); FW.]*
- 2.2** The applicant’s own Planning Statement describes a drainage arrangement that does not support the claimed complete-infiltration credit: paragraph 6.64 specifies swales and an attenuation basin discharging to an adjacent watercourse. The Flood Risk Assessment (FRA) and nutrient note instead rely on infiltration. Discharge to a watercourse cannot be treated as complete infiltration. The applicant should identify the operative design and substantiate any phosphorus-removal credit for its actual treatment train. *[PS, paragraph 6.64; FRA, section 8.3; NN, paragraph 1.1.3.]*
- 2.3** The LLFA’s holding objection of 27 August 2026 states that “it is not considered that infiltration has been demonstrated to be feasible at this stage”. It invites further evidence or an attenuation-based alternative. Paragraph 34 of the earlier appeal decision records a flood-risk conclusion with drainage details to follow; it does not establish approval of this 110-dwelling infiltration-dependent package. The current objection must be addressed on its merits. The LLFA lists the FRA, Parameters Plan and Planning Statement as reviewed documents, not the nutrient note. The Council should obtain explicit, coordinated consideration of the drainage and nutrient consequences and identify any subsequent resolution. *[DR, pp.1–4; AD, paragraph 34.]*

The consequence if the infiltration credit cannot be justified

- 2.4** Removing the SuDS credit raises the pre-2030 budget from 10.96 to 17.28 kg TP/year and the post-2030 budget from 1.98 to 8.30 kg TP/year. At the stated mitigation rate, permanent land rises from 1.34 to about 5.61 hectares:

Period	Published budget (kg TP/year)	Budget with no SuDS credit (kg TP/year)	Land equivalent with no SuDS credit (ha)
Before 2030	10.96	17.28	11.68 total
After 2030	1.98	8.30	5.61 permanent

Basis of the table

Calculation: $(\text{wastewater} + 5.3965109 - 0.9779702) \times 1.20$, with wastewater of 9.98 or 2.50 kg TP/year; the land equivalents are those budgets divided by 1.48 kg TP/hectare/year, rounded as shown. All other inputs – occupancy, treatment-works assumptions and the 20% buffer – are unchanged from the submitted calculation. *[NN, Tables 4-2, 5-2 and 5-3; NC, worksheets in the source schedule.]*

- 2.5** The Fallow Land Management Plan (FLMP) commits 7.41 hectares of temporary grassland plus 1.34 hectares of permanent woodland before first occupation. The correct comparison is 8.75 hectares for 110 dwellings against 7.05 hectares for 49: *about 24% more land for about 124% more dwellings*. Both totals include woodland. This does not establish under-mitigation: requirements follow an evidenced nutrient budget, not dwelling numbers alone. At the stated rate the current 8.75 hectares provide about 12.95 kg TP/year, exceeding the published pre-2030 budget of 10.96 but not the no-credit sensitivity. The applicant should explain the budget and phasing underlying this comparison. *[FLMP, paragraphs 2.4–2.5 and Figure 1; NN, Tables 5-2 and 5-3; AD, paragraph 16.]*
- 2.6** The 11.68 hectares is a total pre-2030 land equivalent, not temporary land additional to the permanent requirement. If approximately 5.61 hectares of permanent mitigation delivered the stated credit from first occupation, approximately 6.07 hectares of further temporary mitigation would meet the balance. The applicant should make the actual phasing explicit without omitting or double-counting permanent mitigation.
- 2.7** Brookbanks identifies approximately 7.87 hectares of permanent and 14.72 hectares of temporary land as available. Mitigation is therefore not shown to be impossible. However, any enlarged or alternative package must have an assessed baseline, suitable location, management, delivery programme and legal security. Availability alone does not establish an effective, secured mitigation package. *[NN, paragraph 5.1.1 and Figure 5-1; FLMP, Figure 1.]*

Occupancy and baseline inputs also require reconciliation

- 2.8** The same application labels two different occupancy figures as a UK average, using the lower for the phosphorus budget and the higher to calculate the SANG requirement. Nutrient note paragraph 4.1.3 uses 2.30 persons per dwelling, although Table 4-1 labels its source South West ONS 2020–2024. Planning Statement paragraph 6.9 invokes a UK average but gives approximately 279 residents for 110 homes – about 2.54 per home. The recreational appendix identifies 2.54 as a Laverstock average. The applicant should identify the datasets and justify these differing assumptions for the same development. *[NN, paragraph 4.1.3 and Table 4-1; PS, paragraph 6.9; RI, paragraph 1.9.]*
- 2.9** Natural England’s calculator allows its 2.40 default to change only with sufficient evidence that the development differs from the national average. Another national average does not by itself demonstrate that distinction. An evidenced local or regional basis may be relevant, but the conflicting descriptions need resolution. Neither the local average nor the reserved housing mix establishes that 2.54 must be used. *[NN, Appendix C instructions, PDF pp.17 and 20, and paragraph 4.1.4; DAS, printed p.30.]*
- 2.10** Occupancy remains material even if full infiltration is accepted. Reproducing the workbook’s 365.25-day conversion and intermediate rounding, occupancy rates of 2.40 and 2.54 would change the post-2030 budget from 1.98 to approximately 2.10 and 2.29 kg TP/year respectively. The applicant should justify the inputs for the Council’s assessment before permanent mitigation is fixed. These sensitivities retain the 0.9 operational factor and 20% buffer; they do not recast those features as errors or suggest that the calculation has no precautionary allowance. The applicant should also complete the blank first-occupancy date so that the date-dependent outputs have an explicit basis. *[NC, Nutrients_from_wastewater!B5:B20 and Final_nutrient_budgets!B6:B12; NN, Table 5-3.]*

Basis of the calculation

Occupancy check: annual wastewater load = ROUND(110 × occupancy × 120 × 365.25 × 0.25 × 0.9 ÷ 1,000,000, 2). The workbook’s net land-use change of –0.8493262 kg/year is then added, the 20% buffer applied and the result rounded to two decimal places. The rounding sequence matters; these are reproductions of the submitted calculation, not estimates of actual household occupancy.

- 2.11** The nutrient workbook credits roughly half a hectare more cereal land than the habitat baseline records: 8.07 hectares against 7.5622. The habitat account identifies woodland, scrub, grassland and sealed surfaces separately within an 8.09021-hectare baseline. Its slightly larger boundary does not explain the cereal discrepancy. The applicant should reconcile the mapped parcels and justify the nutrient classifications. Until then, misclassification is not established. The exclusion of unchanged highway is already explained. *[NC, Nutrients_from_current_land_use!A11:C28; BN, A-1 On-Site Habitat Baseline, rows 11–16 and 259–260; NN, paragraph 2.1.4.]*
- 2.12** The off-site reduction of 1.48 kg TP/hectare/year depends on the stated cereal baseline, soil drainage, rainfall, nitrate-vulnerable-zone status and replacement land use. The expressly described cropping record ends in 2021. The applicant should provide recent parcel-specific management evidence to substantiate the present baseline and existing commitments, including whether credits are already allocated elsewhere. The Council should also seek Natural England's advice on whether the River Sem mitigation addresses the protected waters affected by the actual discharge arrangements, particularly if those arrangements change. *[NN, Table 5-1, paragraphs 5.1.3–5.1.4 and 6.1.3; FLMP, paragraph 1.3.]*

A current assessment and enforceable mitigation

- 2.13** The Council must complete its own Habitats Regulations Assessment (HRA). Regulation 63(3) requires consultation with Natural England and consideration of its representations; this is a procedural duty, not a substitute for the Council's own judgment. Subject to applicable statutory exceptions, approval requires the Council to have ascertained that the proposal will not adversely affect the integrity of the site, which it can do only where no reasonable scientific doubt remains as to the absence of such effects. The drainage, nutrient calculation and secured mitigation must support that conclusion together. Detailed design may follow where essential performance is established and secured, not where it remains an unresolved possibility. *[SHRA, paragraph 5.3; HR, regulation 63; HRA guidance.]*
- 2.14** The FLMP commits to no fertiliser or grazing, removal of cut material, permanent woodland and retention of temporary fallow until specified replacement measures are provided. The Council should secure these commitments through identified land interests, implementation triggers, monitoring and remedial duties. The export coefficient must match the actual management. Existing environmental agreements do not automatically disqualify land, but the improvement credited must be additional and not already allocated elsewhere. *[FLMP, paragraphs 2.4–2.5, 2.12–2.18, 2.21 and 3.3–3.8; NN, paragraph 5.1.4.]*
- 2.15** The Council should apply the statutory treatment-works assumption where the duty covers the receiving works, which Brookbanks identifies as Petersfinger. A possible delay is not itself a reason to disregard that assumption. The applicant should confirm that the works, discharge standard and legal provisions match the calculation, and the Council should secure an approved mechanism for any reduction in land mitigation. *[NN, paragraphs 1.1.4 and 4.2.1–4.2.2; FLMP, paragraph 3.3; DN.]*
- 2.16** The April shadow HRA and July FLMP cite March Rv4, whereas the supplied nutrient note is June Rv5. The Council needs a final HRA of the operative scheme. No current Natural England response has been supplied and none is identified in the current document index; that does not establish that consultation has not occurred. Before determination, the Council should identify the consultation, material sent, response or outcome, and how it has met regulation 63(3), particularly on the phosphorus credit, export coefficient and receiving-water pathways. *[SHRA, paragraphs 3.4 and 5.16–5.21; NN, cover; FLMP, paragraph 1.4; CL; HR, regulation 63(3); DI.]*

3. Drainage: feasibility and consistency of the design

The LLFA's requirements and the investigation record

- 3.1** The LLFA accepts the FRA's findings on existing flood-risk sources but objects to infiltration, seeking instability, groundwater, repeat-testing and aquifer-protection evidence. JPB's October 2023 report covers December 2022 boreholes and January–June 2023 monitoring in the southern field, which also contains the proposed basin. That geographical limitation is not itself a defect in the basin evidence. However, it does not extend the monitoring to the northern field. The only infiltration testing supplied remains GEG's work of March 2015, appended to the FRA, and its northern trial pit IT01 is not thereby representative of every proposed feature. The applicant should plot investigation coverage against actual feature locations and depths, including any on-parcel solution at paragraph 3.7. *[DR, pp.2–4; FRA, JPB sections 1.1–1.2, 2.1 and 4.1, PDF pp.73–77; GEG location plan, PDF p.51; drainage plan, PDF p.114.]*
- 3.2** The LLFA seeks soluble-rock assessment and three consecutive fills at each representative test location and depth. The report describes initial excavations of 2.65–3.50 metres, deeper than the proposed basin. The LLFA calls the final IT01 test abandoned; GEG Table 1 marks test 1 abandoned and gives results for tests 2 and 3, with a further collapse noted in the test-2 record. The 2020 desk study records "Very Low* / Low*" ground-dissolution ratings, both marked as hazards reported on the site. Low-rated mapping does not mean no hazard, or establish the safety of concentrated infiltration. The applicant should reconcile the records and provide the site-specific assessment requested by the LLFA. *[DR, pp.2 and 4; FRA, PDF pp.46–47 and 62; GD, paragraph 4.4 and its asterisked note.]*
- 3.3** The GEG report gives conflicting IT02 infiltration rates, an order of magnitude apart: 2.83×10^{-5} m/s in Table 1 and the calculation, but 2.83×10^{-6} in its conclusion. The adopted 0.075 m/hour (about 2.08×10^{-5} m/s) lies between the tabulated IT02 and IT03 (1.35×10^{-5}) values. The model applies a safety factor of five. The applicant should correct the conflicting exponent and explain how the selected rate and safety factor represent the basin's location, depth and soil profile; the northern IT01 results do not answer that question. *[FRA, PDF pp.47, 51, 62, 64, 66, 68 and 116; SuDS standards, 3.14 and 3.17.]*
- 3.4** BH01, near the proposed basin, recorded water about 1 metre below ground during drilling. Later monitoring gave 4.16 metres in January 2023 and 5.08 metres in February, and the well was dry to its base at about 5.2 metres on three subsequent visits. Both the drilling observation and later monitoring must be considered. Requirement 4.16.2 calls for wet-winter design and sufficient site or nearby records to demonstrate seasonal and maximum likely groundwater levels. The applicant should explain the observations and their representativeness, supplement them with further monitoring or longer nearby records as necessary, and relate the resulting maximum likely level to the proposed invert. The two deeper readings alone do not establish that level. *[DR, pp.2 and 4; FRA, JPB section 5.5, PDF pp.78, 107–111; SuDS standards, 4.16.2.]*
- 3.5** The LLFA specifies a minimum 0.7-metre unsaturated zone; national requirements 1.15 and 4.16.1 specify one metre from the maximum likely groundwater level, including groundwater-pollution protection. The Council should clarify the criterion with the LLFA; the applicant should demonstrate compliance or justify a departure for the Council's agreement. Although the standards are not legislation, NPPF F8(2)(a) expressly expects design in accordance with them, and F8(2)(b) expects lifetime maintenance. Neither limb is limited to major development; only the additional LLFA-advice provision in F8(2)(c) is so limited. These policy requirements operate alongside the separate legal duties concerning protected sites. *[DR, pp.2 and 4; SuDS standards, 1.15, 4.16.1 and departures provisions; NPPF, F8(2)(a)–(c).]*
- 3.6** The applicant's own desk study identifies sensitive chalk bedrock forming a Principal Aquifer and a "High Risk" groundwater-vulnerability rating, alongside its low baseline contamination

assessment and recommendation for Phase II investigation. These are distinct issues: low existing contamination does not establish adequate treatment of new runoff. This supports the LLFA's requirement for aquifer-protection evidence, including any Environment Agency requirements. The later JPB work does not supply replacement infiltration tests. The Council should seek Natural England's advice on the claimed CIRIA C808 basis, soil treatment, receiving-water pathways and maintenance. Neither hydraulic infiltration nor aquifer vulnerability alone establishes the percentage of phosphorus retained; general indices for other pollutants do not establish it either. *[GD, paragraphs 10.8–10.9; DR, pp.3–4; FRA, JPB sections 1.1–1.2 and 4.1, and sections 3.4 and 9.2; NN, paragraph 1.1.3; SuDS standards, 4.6, 4.16 and 6.8.]*

- 3.7** The drainage plan places the 0.47-hectare area east of the pipeline in the northern residential parcel within the southern field – not in the northern SANG field. It may need on-parcel infiltration and approximately 272 m³ storage if gravity drainage to the basin is unviable. The applicant should show which investigation points and tests support that particular location, soil profile and formation depth. A solution demonstrated at the main basin does not automatically demonstrate this alternative; all credited runoff must receive the assumed treatment. *[FRA, paragraph 8.3.0.8 and Appendix C, PDF pp.26 and 114; JPB scope, PDF p.74.]*

Storm recovery and freeboard require a demonstrated design

- 3.8** National requirement 3.16 sets a 24-hour half-empty criterion for rainfall events up to 3.3% annual exceedance probability (approximately 1 in 30 years). Both available figures exceed it: Appendix D reports 2,095 minutes (34 hours 55 minutes), while its 30-year inputs give about 32.5 hours. The reported figure is storage-structure data, not an identified event-specific result: the applicant should explain its starting volume and method. The following arithmetic supplies the more specific challenge. *[FRA, Appendix D, PDF pp.116 and 118; SuDS standards, 3.8 and 3.16.]*
- 3.9** The model specifies zero side infiltration and a 1,432 m² base with a coefficient of 0.075 m/hour and safety factor five. Basal discharge is $(0.075 \div 5) \times 1,432 = 21.48$ m³/hour, or 5.97 litres/second, matching the reported rounded 6.0. With the base covered, this term does not diminish as wetted side area reduces. Half the 30-year plus 40% climate-change storage of 1,397.462 m³ takes about 32.5 hours to drain, even without further inflow: $1,397.462 \div 2 \div 21.48$. On these inputs the 24-hour criterion is not met. The applicant should supply event-specific recovery results and demonstrate compliance or correct the design; “no flooding” does not answer the recovery-time shortfall. *[FRA, Appendix D, PDF pp.116 and 118; SuDS standards, 3.16.]*
- 3.10** The model uses an invert of 53.000 m and cover level of 54.200 m. FRA paragraph 8.4.0.12 states a 1.2-metre depth and 300 mm freeboard. Freeboard is the vertical allowance above the design water level to the relevant threshold. On the stated levels, the published results give: *[FRA, paragraph 8.4.0.12 and Appendix D, PDF pp.116, 118–119; SuDS standards, glossary “Freeboard”.]*

Modelled event	Peak water depth	Freeboard to stated 54.200 m level
30-year event + 40% climate change	0.830 m	370 mm
100-year event + 45% climate change	1.063 m	137 mm

- 3.11** The 100-year result leaves 137 mm – 163 mm less than the stated 300 mm. The applicant should reconcile the crest, model and stated design criterion, showing any change to basin size or banks; the drawing also appears to reverse bed and bank labels. The model predicts no flooding under its assumptions. The criticism is the inconsistency with the stated allowance, not a claim that flooding is predicted or that 300 mm is a universal statutory threshold. *[FRA, Appendix C and Appendix D, PDF pp.114, 116 and 119.]*

- 3.12** If infiltration cannot be demonstrated, the LLFA requires an attenuation-and-discharge alternative with a suitable outfall. The applicant should carry the alternative's storage, levels, discharge and treatment performance through the nutrient budget, mitigation commitments, usable open space and habitat metric. Any departure from a national standard needs a documented justification agreed with the approving body. Such agreement would concern drainage design only; it would not discharge the separate duty to assess effects on the River Avon SAC. *[DR, pp.3–4; NN, Table 4-2; PP; SuDS standards, provisions on departures and requirement 6.8.]*
- 3.13** NPPF DM2(1) and Annex C identify a statement outlining achievement of the national SuDS standards for proposals affecting drainage. The supplied index lists the FRA but no separately titled SuDS statement. That alone does not establish missing information. The Council should ask the applicant to identify where its submissions provide the required explanation and supply a concise compliance schedule addressing the LLFA's concerns, the calculations above and any departures. This is a request for the information needed at determination, not an allegation that the original validation was unlawful. *[NPPF: DM2(1), printed p.18; F8(2)(a)–(c), printed pp.86–87; Annex C, SuDS row, printed p.117; DI; FRA.]*

4. Recreation and ecology: the larger scheme and its routes

A different mitigation arrangement from the earlier permission

- 4.1** The earlier scheme required no on-site SANG arrangement following its reduction below 50 dwellings, as the committee report expressly records. The Inspector accepted a £29,400 contribution for New Forest mitigation. The present reliance on on-site SANG and linked Cockey Down walks is therefore a different arrangement. The Inspector also accepted Natural England's advice that recreational pressure from 49 dwellings was unlikely to harm Cockey Down Site of Special Scientific Interest (SSSI), and found a management contribution unnecessary under regulation 122. Those findings remain material but do not decide the effects of the larger scheme and its different mitigation. *[PS, Appendix 1, PDF pp.71–72; AD, paragraphs 21–22 and 27–28.]*
- 4.2** The present Ecological Impact Assessment (EcIA) identifies potential trampling, erosion and nutrient enrichment. The Council should assess, with ecological advice, the consequences of 110 dwellings and the promoted routes, and explain why the earlier no-harm conclusion remains applicable or what further measures are necessary. The Inspector noted concerns about the Cockey Down visitor survey but preferred Natural England's view that harm was unlikely. Repeating that criticism alone would not answer him, but the change in scale and mitigation arrangement does require assessment. Offering management funding is not an admission of harm, and any obligation must satisfy the applicable necessity and proportionality tests. *[EcIA1, non-technical summary; RI, paragraphs 1.6, 1.10 and 1.18–1.26; AD, paragraphs 27–28 and 39.]*
- 4.3** New Forest SAC/SPA/Ramsar mitigation and Cockey Down SSSI effects require distinct assessments. Cockey Down is not part of a designated European site, and NPPF N6 distinguishes the relevant tests. The Council should therefore assess SANG both for diverting New Forest visits and for its consequences for Cockey Down. *[AD, paragraphs 20–28; RI, paragraphs 1.6–1.10; NPPF, N6.]*

The walking-route explanation relies on Cockey Down

- 4.4** No labelled on-site circuit reaches the cited walking length. On the Access and Walking Routes Plan, Rev P05 dated 23 June 2026, the only circuit at or near the recreational appendix's 2.3–2.5 km length is Route A (2.55 km), shown wholly outside the red-line application site on "Cockey Down Open Access Land". None of that circuit passes through the proposed on-site SANG. Route B (1.77 km) follows the application land; D (2.04 km) also runs through Cockey Down, while C and E are 1.31 and 1.33 km. Route A is a separate downland circuit reached from the development, not an on-site SANG circuit that merely crosses the boundary. *[WR, key and mapped routes; RI, paragraphs 1.10 and 1.18; PP.]*

- 4.5** The applicant should identify the continuous walk relied upon and reconcile the Planning Statement lengths: the appendix says routes meet the length requirement “combined”. That explanation needs to show how applicable guidance is met, including any justified flexibility, and include a plan plotting the statutory SSSI boundary and sensitive features against the routes. Open-access shading alone is not that boundary. The Council should assess the proposed SANG’s suitability and additional Cockey Down use with advice from its ecologist and Natural England, and secure the access, management and funding needed to divert New Forest visits without unacceptable SSSI harm. The existence of Route A does not, without this explanation, substantiate the claimed SANG compliance. *[WR; RI, paragraphs 1.10 and 1.18–1.23; PS, paragraphs 6.9–6.10; PP.]*

The ecological conclusion must match the actual management package

- 4.6** The visitor evidence comprises two December 2022 survey days, 38 responses and 40 visitors, reporting substantial dog walking and departures from paths. This neither proves mitigation failure nor establishes year-round representativeness. The applicant should justify the survey coverage, denominators and behavioural assumptions for the larger scheme, with proportionate further evidence. The Council should seek its ecologist’s advice on the SSSI’s condition, assessed feature by feature. *[EcIA1, paragraphs 3.7–3.15 and 4.5–4.6; RI, paragraph 1.12.]*
- 4.7** The proposed site presence is described as one day per month in paragraph 1.15 but costed as one day per week in paragraph 1.25. The applicant should identify the service actually relied upon and ensure its ecological assessment matches the funded commitment. The appendix records agreement with Wiltshire Wildlife Trust on a contribution for a larger historical scheme; the applicant should confirm the current agreement for 110 dwellings and its relationship to the SANG, information, signs, bins and fencing measures. *[RI, paragraphs 1.15–1.25.]*
- 4.8** The stated £189,454 contribution for 110 homes corresponds to scaling £223,900 by 110/130, not the described 110/135. This does not demonstrate underfunding, but the applicant should confirm the agreed basis, indexation and service. It should also justify the 30-year term adopted in lieu of perpetuity and set out continuing management, monitoring and remedial arrangements. *[RI, paragraphs 1.25–1.26.]*

Biodiversity delivery and a coherent habitats assessment

- 4.9** The BNG workbook reports 18.65244 baseline area-habitat units and 21.24647 post-intervention units: 13.9072% net gain. Hedgerow gain is 97.9703% and the trading summary records compliance. I do not dispute that arithmetic or allege double counting merely because greenspace is multifunctional. Nevertheless, the applicant should demonstrate that its target habitat conditions – including moderate-condition SANG grassland – are deliverable alongside recreation, mowing and drainage. *[BN, Headline Results!H8:H17, H51:H55; A-2 On-Site Habitat Creation, rows 15–16; EcIA1, Appendix H, paragraphs 4.14–4.16.]*
- 4.10** The applicant should account for the full drainage footprint in one mapped habitat and greenspace schedule, which shows the habitat categories covering the base, banks and other drainage areas. The metric’s SuDS entry is 490 m², the nutrient workbook’s Water entry is 1,800 m², and the FRA basin base alone is 1,432 m². The applicant should revise the metric and usable-space account for any redesign. Different category definitions may explain the figures; they do not remove the need for a complete, traceable account. The present 13.9072% result cannot simply be carried over to a changed layout. *[BN, A-2 On-Site Habitat Creation!G22 and Z22; NC, Nutrients_from_future_land_use!A8:B8; FRA, Appendix D, PDF p.116; SuDS standards, 6.8.]*
- 4.11** The bird assessment draws on surveys from 2015, 2017 and 2020, while the EcIA also contains a July 2025 habitat survey and more recent bat work. The Council should seek its ecologist’s advice on whether the older bird evidence remains adequate and require the applicant to update it if and where necessary. *[EcIA1, paragraphs 3.3–3.4 and 3.10; Appendix G.]*

4.12 Salisbury Plain SPA is treated inconsistently in three places. SHRA paragraph 2.5 screens out effects by reference to distance and a 2012 strategy. Planning Statement paragraph 6.11 instead identifies CIL-funded mitigation for likely effects. The earlier Inspector found a likely significant effect on the SPA and accepted mitigation under a strategy reviewed in June 2024. The Council should distinguish the SPA from the SAC in its current HRA and identify the applicable strategy, screening conclusion and any mitigation relied upon. A no-pathway conclusion is not interchangeable with a conclusion that harm is avoided through mitigation. *[SHRA, paragraph 2.5; PS, paragraph 6.11; AD, paragraphs 24–26.]*

5. Transport: reliability of the published comparisons

Different simulation periods produce a misleading queue comparison

5.1 Table 7.2 reports a morning A30 West queue of 24.4 passenger car units (PCU) without development and 24.1 PCU with development, with delay reducing from 83.60 to 82.41 seconds. The detailed output shows that these are maxima from different modelled durations: **90 minutes without development and 60 minutes with development**. The evening durations likewise differ. This is not a like-for-like basis for presenting the development’s effect. *[TA1, Table 7.2; TA2, PDF pp.48 and 50.]*

2031 scenario	AM simulation	PM simulation	Duration
Do Nothing	07:45–09:15	16:45–18:15	90 minutes
With Development	07:45–08:45	16:45–17:45	60 minutes

5.2 The same-time comparison is materially different. At the end of the 08:30–08:45 segment, A30 West’s queue increases from 21.4 to 24.1 PCU and its delay from approximately 74.01 to 82.41 seconds. The 24.4 PCU and 83.60 seconds used for the Do Nothing summary are reached later, in the 09:00–09:15 segment. *[TA2, PDF pp.60 and 66.]*

A30 West: scenario and time segment	End queue (PCU)	Delay (seconds)
Do Nothing, 08:30–08:45	21.4	74.01
With Development, 08:30–08:45	24.1	82.41
Do Nothing, 09:00–09:15: later summary maximum	24.4	83.60

5.3 The same-time ratio of flow to capacity (RFC) rises from 0.975 to 0.983. The Do Nothing queue keeps building across its final four segments: 19.4, 21.4, 23.1 and 24.4 PCU. The With Development queue also rises – 18.0, 21.4 and 24.1 PCU in its last three segments – but stops at 08:45, omitting the later half-hour retained for Do Nothing. The run is cut off during queue growth, not after a demonstrated peak or recovery. The reported improvement is an artefact of unequal cut-offs, not a development benefit. Continuing the same demands would be expected to increase the With Development queue further; no later maximum is calculated here. The applicant should provide matching durations and profiles sufficient to establish both peaks and recovery, for review by the Highway Authority. *[TA2, PDF pp.60 and 65–66; inference from the published segment sequence, not a model rerun.]*

The 2026 morning baseline does not match the flow diagram

- 5.4** There is a separate discrepancy between the entry flows on diagram TF_05 and those actually used by the 2026 AM roundabout model. The first numerical column below is calculated by adding each arm's entry movements in the diagram. The second is taken directly from the model's detailed demand and results tables. [TA2, PDF pp.7 and 53–54.]

Entry arm	2026 AM diagram total (PCU/hour)	2026 AM model demand (PCU/hour)
Church Road	511	359
A30 West	1,036	819
A338	665	547
A30 East	607	741

- 5.5** The report says 2019 flows were grown to 2026, then 2031. Church Road's 2031 Do Nothing demand of 539 PCU/hour is consistent with applying 5.49% growth to 511, not the 359 used in the 2026 model. This identifies a baseline-chain mismatch, not proof that the 2031 input is wrong. The applicant should explain and correct the mismatch before the Council or Highway Authority relies on the 2026 assessment. [TA1, paragraphs 4.14.3–4.14.5, Table 6.1 and paragraphs 6.3.3–6.3.4; TA2, PDF pp.54 and 58.]

Capacity, survey coverage and the local road environment

- 5.6** The morning With Development output assigns level-of-service grade F to A30 West and Church Road, while the main report describes all arms as operating within capacity. These are different measures, but the reassuring summary does not explain the poor operating quality shown in the output. A30 West also exceeds the model's reporting thresholds of 0.85 RFC, 36 seconds' delay and 20 PCU queue. An RFC below one does not establish satisfactory or resilient operation. The applicant should explain the results. The Council should apply the transport decision test to corrected evidence, informed by Highway Authority advice; the reporting thresholds do not by themselves determine refusal. [TA2, PDF pp.48 and 50; TA1, paragraph 7.2.9.]
- 5.7** The counts were taken on one day, 12 March 2019, between 07:30–09:30 and 16:30–18:30. The selected peak hours are 07:45–08:45 and 16:45–17:45. The Council should establish whether these counts remain representative, including changes in road operation and travel patterns, and require proportionate validation. The absence of a new count is not proof that all forecast flows are wrong; it is important because the conclusions depend on those inputs. [TA1, paragraphs 4.13.1–4.13.4.]
- 5.8** The member call-in dated 20 August 2026 expressly raises afternoon school pickup, the Church Road Traffic Regulation Order stated to have commenced on 7 October 2024, and the interaction of access turning, crossings and school traffic. These are recorded concerns, not a substitute for the Order or technical evidence. The applicant's own TRICS appendix, however, gives a 15:00–16:00 rate of 0.368 movements per dwelling – about 40.5 for 110 homes. That hour falls outside both surveyed windows in paragraph 5.7, and the junction assessment does not test it against local counts. The applicant should explain the survey scope. The Highway Authority should review pedestrian demand, stopping activity and junction interaction, including any effect of the Order. [CB, p.2; TA2, PDF p.24; TA1, sections 4.13 and 7.2.]
- 5.9** The separately supplied access drawing is SK_T_012 Rev P11, dated 22 July 2026, later than Rev P9 embedded in the Transport Assessment. It labels both accesses as serving residential development and identifies two puffin crossings. The DAS instead refers to an access serving a car park; the Travel Plan action table refers to zebra crossings. The Council should establish one

operative access and crossing scheme and confirm that the model and delivery commitments correspond to it. Concentrating all residential traffic at one modelled access is not inherently an underestimate, but does not resolve the wider interaction questions. *[AP, key, notes and revision record; TA2, PDF p.16; TA1, paragraph 7.2.12; DAS, printed p.31; TP, Table 10.1.]*

- 5.10** The 51 morning vehicle movements are the whole development forecast, distributed approximately half northwards – not all added to A30 West. The modal table appears to apply mode shares to a vehicle total, but the access model retains all 38 departures and 13 arrivals. This reporting error has therefore not reduced the vehicle total used in that access model. The applicant should correct the reporting. *[TA1, Tables 6.3–6.5; TA2, PDF p.73.]*
- 5.11** The Travel Plan includes a coordinator, cycle and bus incentives, a ten-bike e-bike terminal, an initial e-car club vehicle and monitoring. The Council should secure their delivery and funding. The applicant should explain the target baselines: 69.8% car drivers and 63.8% single-occupancy car journeys are different measures with no derivation shown. The TA expressly excludes Travel Plan reductions from its capacity assessment, so its results are not alleged to depend on those targets. *[TP, Tables 6.1–6.2 and sections 7–9; TA1, paragraph 7.2.17.]*
- 5.12** I ask the Council to obtain a reproducible assessment from the applicant and an explicit Highway Authority response on the duration and baseline discrepancies and the combined operation of accesses and crossings in the school environment. The Council should apply NPPF TR6 to that corrected evidence. *[TA1, section 7; NPPF, TR6, printed pp.71–72.]*

6. Landscape, visual effects and the proposed scale

The acknowledged local harm needs weight, not a label of insignificance

- 6.1** The June appraisal identifies approximately 18 neighbouring Church Road properties as a high-sensitivity receptor. It assesses Major/Moderate Adverse effects during construction and completion, reducing to Moderate Adverse at year 15. Those residual ratings already allow for setbacks and planting; pointing to the same measures does not answer the harm. The Council should give these continuing effects explicit weight in the planning balance. *[LVA, Appendix C, receptor B, PDF pp.56–57.]*
- 6.2** Church Road and Cockey Down access-land users face Moderate Adverse effects on completion, reducing to Moderate/Minor Adverse at year 15. The site and immediate context experience Major/Moderate Adverse construction effects, Moderate Adverse on completion and Moderate/Minor Adverse at year 15. Negligible effects over large character areas do not cancel these local effects. *[LVA, Appendix B, PDF p.55; Appendix C, receptors A and E, PDF pp.56–57.]*
- 6.3** The (undated) tables in Appendix B and Appendix C, supplied as separate documents, answer “No” throughout a significance column absent from the June embedded tables. The Appendix C table further rates seven receptors lower: B, E, F, G and J High/Medium, and H and I Medium, against High in June. Yet the effect ratings are identical throughout, for every receptor and every time period. Five of the seven downgraded receptors – B, E, F, G and J – carry substantive effects, and none of those ratings moves. If sensitivity feeds the effect judgement as Appendix A describes, a change in sensitivity should alter the outcome. It does not. Appendix A defines sensitivity, magnitude and effect levels but no separate rule for these binary answers; main paragraphs 2.13 and 2.23 discuss significance qualitatively. The applicant should identify the operative version and explain the differences and how “No” follows from the stated principles, including for Major/Moderate Adverse effects on residents. Formal EIA significance findings are unnecessary, but unexplained “No” answers cannot displace the acknowledged adverse effects or their planning weight. *[LET; VET, receptors B, E–J; LVA, June embedded Appendix C, PDF pp.56–58, Appendix A and main paragraphs 2.13 and 2.23–2.27.]*

The assumptions supporting the landscape conclusion

- 6.4** The appraisal acknowledges the Special Landscape Area, Core Policy 51 and saved policy C6. The Council should assess the site's contribution to that landscape and the larger proposal's effects on the village setting, with appropriate policy weight. The issue is local character, not the absence of a separately named SLA table row. *[LVA, paragraphs 3.11–3.15 and 4.34.]*
- 6.5** The photographs date from 26 August 2020. The appraisal describes year-one winter and year-15 summer conditions without illustrating leaf-off views. The applicant should provide updated representative evidence testing buildings, finished levels and planting from Church Road, nearby properties and Cockey Down, including mature winter conditions. *[LVA, paragraphs 2.15 and 4.46; Figures 7–14.]*
- 6.6** The earlier Inspector accepted a layout retaining substantial open space and some views above and between development. The current parameters plan marks one view towards Cockey Down's highest point. The DAS allows some buildings of 2.5 or 3 storeys, although its scale legend shows two and two-and-a-half storeys; the Planning Statement also envisages three storeys. The applicant's visual assessment must test the height and finished-level range actually sought. *[AD, paragraph 33; PP; DAS, printed pp.32 and 37; PS, paragraph 3.2.]*
- 6.7** Density alone does not dictate height. The applicant must nevertheless demonstrate that up to 110 dwellings can fit satisfactorily within the landscape, drainage, access and ecological constraints. The Council should secure essential corridors, setbacks, height limits and vegetation, while detailed design remains reserved. The objection concerns landscape character, visual amenity and the village setting, not property values or a right to every private view. *[DAS, printed p.35; PP; LVA, sections 5–6.]*

7. Planning balance and requested action

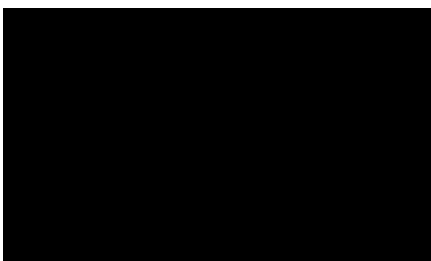
- 7.1** The 44 affordable homes are an important benefit, supported by the Housing Enabling Team subject to planning acceptability. It seeks 29 social-rented and 15 shared-ownership homes rather than the proposed 36 rented and eight affordable-home-ownership units. The Council should secure an appropriate agreed mix. Usable open space, pedestrian improvements, Travel Plan measures and deliverable biodiversity gains also weigh positively, but do not replace the necessary demonstration of mitigation. *[HE, pp.1–2; PS, Summary paragraphs 16–17; TP, sections 7–9.]*
- 7.2** The principal concerns are substantive. The unresolved infiltration premise changes the phosphorus package. Independently of the LLFA's opinion, the submitted levels fall short of the stated 300 mm freeboard and the storage/discharge inputs give about 32.5 hours against the national 24-hour recovery criterion. The transport comparison cuts off a still-growing queue early, producing a misleading improvement, and its baseline inputs conflict with the diagram. The applicant must justify reliance on off-site Cockey Down walks without unacceptable SSSI effects; the Council should give the acknowledged residual landscape harm appropriate weight. Correcting labels alone would not resolve these matters. *[FRA, Appendix D, PDF pp.116–119; SuDS standards, 3.16; sections 2–6 above.]*
- 7.3** The table below identifies what I believe to be needed before approval could properly be considered, and where responsibility lies for each action:

Matter	Requested action and presumed responsibility
Drainage and nutrients	The applicant should resolve the LLFA's concerns and workbook inputs. The Council should obtain updated LLFA advice, consult Natural England under regulation 63(3), assess the coordinated drainage/nutrient package and secure mitigation.
Drainage feasibility	The applicant should provide representative investigations and aquifer-protection evidence, reconcile test rates, and address the eastern parcel, recovery time, freeboard and any alternative outfall in a SuDS compliance schedule. The Council, advised by the LLFA, should resolve the groundwater criterion and assess any proposed departures.
Recreation and ecology	The applicant should justify the SANG, off-site Route A and management, reconcile the habitat/greenspace account and address Salisbury Plain. The Council should assess SSSI effects and the difference from the earlier contribution-based mitigation, with ecological and Natural England advice, and secure necessary measures.
Transport	The applicant should correct simulation periods, include queue build-up and recovery, reconcile baseline inputs, and address school periods, the Traffic Regulation Order and Rev P11 access/crossing interactions. The Council should obtain Highway Authority advice and secure Travel Plan commitments.
Landscape and scale	The applicant should identify the current effects tables and test heights, levels and layout. The Council should give residual harm explicit weight and secure essential parameters.
Decision record	The Council should identify current policy, housing evidence, fallback, consultation outcomes and agreed departures, and explain the weight given to secured benefits and residual harms.

7.4 I ask the Council to refuse permission where essential mitigation remains unproven or unsecured, or impacts cannot be made acceptable under the applicable policies. If material amendments are received, the Council should give consultees and affected residents an appropriate opportunity to respond. Any refusal should rest on the substantive matters remaining, not document-control errors alone.

7.5 I support Councillor Nick Baker's call-in request dated 20 August 2026, conditional on an approval recommendation. It raises scale, visual impact, design, Cockey Down, River Avon mitigation and school/highway effects. I ask the Council to confirm committee arrangements, notify me by email and allow an opportunity to speak. I submit this as a local resident, not an expert witness, and ask the Council to address the cited evidence and calculations. *[CB, pp.1-2.]*

Peter Millican



Source schedule

The factual representations use the applicant's supplied documents, original consultation responses, the member call-in and the earlier appeal decision. Both native workbooks and the separately supplied access and walking-route plans have been inspected. Dates stated below are the dates on the documents, not necessarily their upload dates. The supplied index does not establish the complete current record: later responses, revised documents and any resolution of the LLFA objection should still be checked.

Page convention: "PDF p." counts the cover as page 1 in the supplied file; "printed p." means the document's own page label. The DAS contains two-page spreads. Paragraph and table numbers are those of the cited document.

Alphabetical by citation code. DN, FW, HR, HRA guidance, NPPF and SuDS standards identify separately checked legal, policy and technical sources; the other entries identify supplied documents.

Code	Source and identifying details
AD	Planning Inspectorate, appeal decision APP/Y3940/W/25/3359108, Land East of Church Road, Laverstock; 10 October 2025. References use the 13-page decision.
AP	Ridge, Proposed Vehicular and Pedestrian Access, project 14150, SK_T_012 Rev P11; revision record dated 22 July 2026. Separately supplied one-page plan, later than Rev P9 in the Transport Assessment.
BN	Biodiversity Net Gain Matrix.xlsx, supplied native workbook. Start!F17 records completion on 14.05.2026. Headline Results; A-1 On-Site Habitat Baseline; A-2 On-Site Habitat Creation; B-1 On-Site Hedge Baseline; B-2 On-Site Hedge Creation. The recorded headline values and component arithmetic have been checked, not independently surveyed.
CB	Councillor Nick Baker, committee referral/call-in form for PL/2026/04207, dated 20 August 2026 on p.2; two pages. Conditional on an approval recommendation. The document index's 23 August entry is not the date entered on the form.
CL	List of Consultees & Neighbours; supplied six-page document, with the consultee list at p.1.
DAS	FPCR, Design & Access Statement, Land off Church Road, Laverstock, June 2026; 24 PDF pages containing printed-page spreads.
DI	Document Index from "Documents" tab on Wiltshire Council Planning Application website for Application Reference PL/2026/04207, consulted last on 15 September 2026.
DN	Defra, Notice of designation of sensitive catchment areas 2024; River Avon designation and the treatment-works upgrade assessment assumption. Official source
DR	Wiltshire Council, Drainage (Cecily Austin) to Becky Jones, PL/2026/04207, 27 August 2026; supplied as Drainage's comment.pdf, six pages. Holding objection on p.1; assessment pp.2–3; recommendation and further-information requirements p.4. No subsequent response has been supplied.
EclA1	FPCR, Ecological Impact Assessment Part 1, June 2026; 117 pages, including breeding-bird and BNG reports.
FLMP	FPCR, Fallow Land Management Plan, 2 July 2026; 12 pages including the mitigation parcels at Figure 1.
FRA	Brookbanks, Flood Risk Assessment, 10679 FRA02 Rv4, 26 June 2026; 126 pages. GEG infiltration report at pp.40–68; JPB investigation at pp.69–112; drainage drawing p.114; calculations pp.116–119.
FW	House of Commons Library, Sustainable Drainage Systems (SuDS), CBP-10483, 4 February 2026, online briefing; identifies Schedule 3 as not in force in England. See also the Government's answer to written question 108287, 29 January 2026. Parliamentary briefing Government answer
GD	Brookbanks, Geo-Environmental Phase 1 Desk Study, 10679 DS01 Rv2, final 7 December 2020; 49 pages. This is historical desk evidence, not a new infiltration investigation.
HE	Wiltshire Council Housing Enabling Team, Kieran Marsh, consultation response dated 20 August 2026, PL/2026/04207; four pages. Affordable-housing support is conditional on the site being accepted through the planning process.

Code	Source and identifying details
HR	Conservation of Habitats and Species Regulations 2017, regulation 63, as amended. This statement addresses the bespoke mitigation route advanced by the applicant; any different statutory route or exception relied upon should be identified and its applicability demonstrated. Official source
HRA guidance	Defra, Natural England and other publishing authorities, Habitats regulations assessments: protecting a European site; consultation, precaution, screening and appropriate assessment. Official source
LET	Separately supplied Appendix B – Landscape Effects Table Laverstock, four pages; used to identify version differences, not as a substitute for the June appraisal.
LVA	FPCR, Landscape & Visual Appraisal, June 2026, Rev B approved 24 June 2026; supplied as Landscape and Visual Assessment.pdf, 59 pages. The embedded tables are used for the current effects.
NC	Nutrient Calculator – River Avon SAC.xlsx, supplied native workbook. Key sheets: Nutrients_from_wastewater; Nutrients_from_current_land_use; Nutrients_from_future_land_use; SuDS; Final_nutrient_budgets. References give worksheet and cell addresses. The first-occupancy cell B5 is blank.
NN	Brookbanks, Technical Note 01 Rv5: Nutrient Assessment and Mitigation Strategy, project 10679, 30 June 2026; 24 pages including drawings and calculator sheets.
NPPF	Ministry of Housing, Communities and Local Government, National Planning Policy Framework: Plan-making and national decision-making policies, August 2026 (published 17 August 2026). Relevant provisions: S3–S5, printed pp.24–27; DM2(1), printed p.18; TR6, printed pp.71–72; F8(2)(a), printed p.86, and F8(2)(b)–(c), printed p.87; N6, printed pp.91–92; Annex C SuDS information requirement, printed p.117. GOV.UK landing page August 2026 PDF
PP	FPCR, Parameters Plan, Rev P16; referred to in the nutrient note as 6450_XX_XX_DR_L_02; supplied one-page drawing.
PS	Star Planning and Development, Planning Statement including Affordable Housing and Planning Obligations, June 2026; 97 pages, including the earlier committee report and decision.
RI	FPCR, Appendix I: Mitigating Recreational Impacts, cover dated March 2026; within Ecological Impact Assessment Part 2, June 2026, PDF pp.15–21.
SHRA	FPCR, Shadow HRA: Test of Likely Significant Effects and Appropriate Assessment, April 2026; 37 pages, marked Draft in its revision table.
SuDS standards	Defra, National standards for sustainable drainage systems (SuDS), updated 30 July 2025; requirements 1.15–1.17, 3.8, 3.14–3.17, 4.6, 4.16.1–4.16.2 and 6.8; glossary “Freeboard”; agreed-departure provisions. NPPF F8(2)(a) expressly expects design in accordance with these standards, although they are not themselves legislation. F8(2)(b) addresses lifetime maintenance and (c) LLFA advice on major proposals. Official source
TA1	Ridge & Partners, Transport Assessment Part 1, 14150-TA-02, Version 2, March 2026; 60 pages.
TA2	Transport Assessment Part 2, March 2026; 77 pages. TF_05 p.7; access drawing p.16; TRICS pp.20–24; roundabout outputs pp.48–69; site-access outputs pp.70–77.
TP	Ridge & Partners, Framework Travel Plan, 14150-FTP-02 Version 2, March 2026, issue record 31 March 2026; supplied as Travel Plan.pdf, 43 pages.
VET	Separately supplied Appendix C – Visual Effects Table Laverstock, four pages; used to identify version differences, not as a substitute for the June appraisal.
WR	FPCR, Access and Walking Routes Plan, Rev P05, dated 23 June 2026; one page. Title-block number 6450-FPCR-DR-XX-XX-DR-L-0009; filename reference 6450-XX-XX-DR-L-09-P05.

Scope of checking. NPPF DM2(1), F8(2)(a)–(c), N6, S3–S5, TR6, Annex C and both official links were checked against the published text on 15 September 2026. Earlier legal, policy, workbook, route and investigation checks are retained. The 32.5-hour calculation reproduces submitted inputs, not an event simulation. The queue-truncation inference uses published segments; no later With Development maximum is asserted. Native drainage and junction models have not been rerun; habitat condition has not been independently surveyed. Open-access shading is not assumed to define the SSSI. CIRIA C808, the earlier nutrient workbook and later consultation responses remain unverified.