

Factual Error in Drainage Strategy and Total Invalidation of Nutrient Report (Application PL/2026/05064)

As a direct neighbour living opposite the application site, I wish to lodge this separate objection regarding a catastrophic factual error in the applicant's submission that invalidates their entire environmental assessment.

1. A Factually Impossible Strategy

The **Raw Planning Statement (Clause 5.31)**, *dated August 2026*, and the **Holbury Nutrient Mitigation Report (Clause 2.1)**, *dated 24 March 2025*, explicitly base their calculations and strategy on the assumption that foul waste will be processed via the mains at the **Amesbury Sewerage Treatment Plant**.

This is factually impossible. There is no mains drainage infrastructure in Upper Woodford or the wider Woodford Valley.

Every single property in Upper Woodford relies strictly on private off-mains drainage (septic tanks or package treatment plants). Because a public sewer connection does not exist, the development will be forced to use an on-site system, as indicated on the **Planning Application Form**, *dated 11.08.26*.

2. Invalidation of Nutrient Neutrality Calculations

Because the Applicant cannot connect to the mains, the Holbury Nutrient Mitigation Report (dated 24 March 2025) is completely worthless. Its phosphorus calculations (0.19 kg of TP/year) are based strictly on the processing capabilities and future upgrades of the Amesbury mains works. An on-site Package Treatment Plant or septic tank discharging effluent near a protected watercourse requires a completely different, highly complex nutrient budget.

3. Unassessed Risks to the River Avon SAC/SSSI

The applicant has failed to provide any technical details for the private system they must actually install:

- No site assessment or drainage chain layout has been provided by a supplier.
- No plans show the positioning of the main unit or drainage fields.
- Crucially, installing an on-site system will require major excavation within **8 metres of the River Avon SAC/SSSI**. This triggers a strict requirement for a Flood Risk Activity Permit from the Environment Agency, yet no construction environmental management plan has been submitted to mitigate the immediate risk of pollution, siltation, or flooding to this internationally protected habitat.

Conclusion

Wiltshire Council cannot legally complete its statutory Habitats Regulations Assessment (HRA) or grant permission based on a copy-and-paste drainage strategy that physically cannot be built. I urge the Case Officer to reject this application or demand its immediate withdrawal.