

9th April 2025

Neil Ridgway
Stowell Farms

By email

Our Ref: RMA/LC2827 – Sharcott Pennings Farm NNA

Dear Neil,

RE: PROPOSED SLURRY RESERVOIR AND NEW LIVESTOCK BARN AT SHARCOTT PENNING'S FARM, PEWSEY, WILTSHIRE – NUTRIENT NEUTRALITY ASSESSMENT & MITIGATION STRATEGY

RMA Environmental has been instructed to review the need for a Nutrient Neutrality Assessment & Mitigation Strategy (NNAMS) to support a planning application for the formation of a slurry reservoir, infilling of an existing slurry reservoir and erection of a new livestock barn on land at Sharcott Pennings Farm in Pewsey (Wiltshire Council planning ref: PL/2023/03879). The proposed development layout is shown in Appendix A.

The application site lies in the southern part of the existing yard area of Sharcott Pennings Farm (refer to Figure 1.1). The farm is located on land which drains to the River Avon Special Area of Conservation (SAC) which requires the proposed development to consider achieving nutrient neutrality (refer to Figure 2.1).

Natural England objected to the proposal on the basis that no nutrient budget calculations or mitigation scheme had been provided to demonstrate nutrient neutrality. The Natural England objection letter states the following: *"A bespoke nutrient calculation will be necessary in this case. In the first instance, we advise that information is provided by the applicant on the livestock numbers that are legally permitted at the farm and whether the proposed development will change the legal baseline"*.

The current herd comprises 760 dairy cows, 439 heifers and 82 calves, i.e. a total of 1,281 animals. It is understood that the adult animals do not go out to graze as they are housed in livestock barns all year round. The farm comprises an area of 1,200 ha (i.e. 3,000 acres) and no phosphate fertiliser is applied to the land. A further 200 ha (i.e. approximately 500 acres) of land is farmed within the wider estate. The slurry from livestock is used to provide sufficient phosphate to maintain optimum agricultural conditions. As a result of construction of the new livestock barn, the size of the herd has the potential to increase to 1,678 animals.

A Natural England Research Report entitled 'Grazing Livestock in the Lowlands' states that *"the average stocking rate on a lowland dairy farm is 2 livestock units (two dairy cows) per hectare. This stocking rate would present manure disposal problems in a Nitrate Vulnerable Zone. Permissible rates for manure application will be raised in autumn 2009, to allow an equivalent of approximately 2.5 cows per hectare"* (NERR030).

Although the adult animals do not go out to graze, their slurry is spread across the 1,200 ha of fields which make up the farm holding (and potentially on the 200 ha of additional land discussed above). The equivalent current and future stocking rates for Sharcott Pennings Farm are as follows:

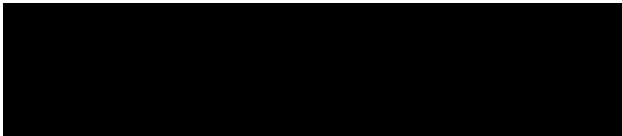
- Current: 1,268 cows on 1,200 ha = 1.06 cows/ha (53% of average stocking rate); and
- Future: 1,678 cows on 1,200 ha = 1.40 cows/ha (70% of average stocking rate).

As the stocking rates are significantly below the average of 2.0 dairy cows per hectare set out in NERR030 (both now and in the future), it is concluded that the proposed development would not give rise to an exceedance of the average stocking rate and therefore the phosphate losses from the farm as a result of slurry application would remain well below the average.

Given that the proposed development does not constitute a land use change (i.e. dairy to dairy) and would not result in the equivalent stocking rate exceeding the average set out in NERR030, then it is concluded that the proposal is phosphate neutral and no nutrient mitigation is required.

I trust that this assessment provides sufficient information to allow Natural England to remove their objection, but please do not hesitate to contact me if you have any questions or need any additional information.

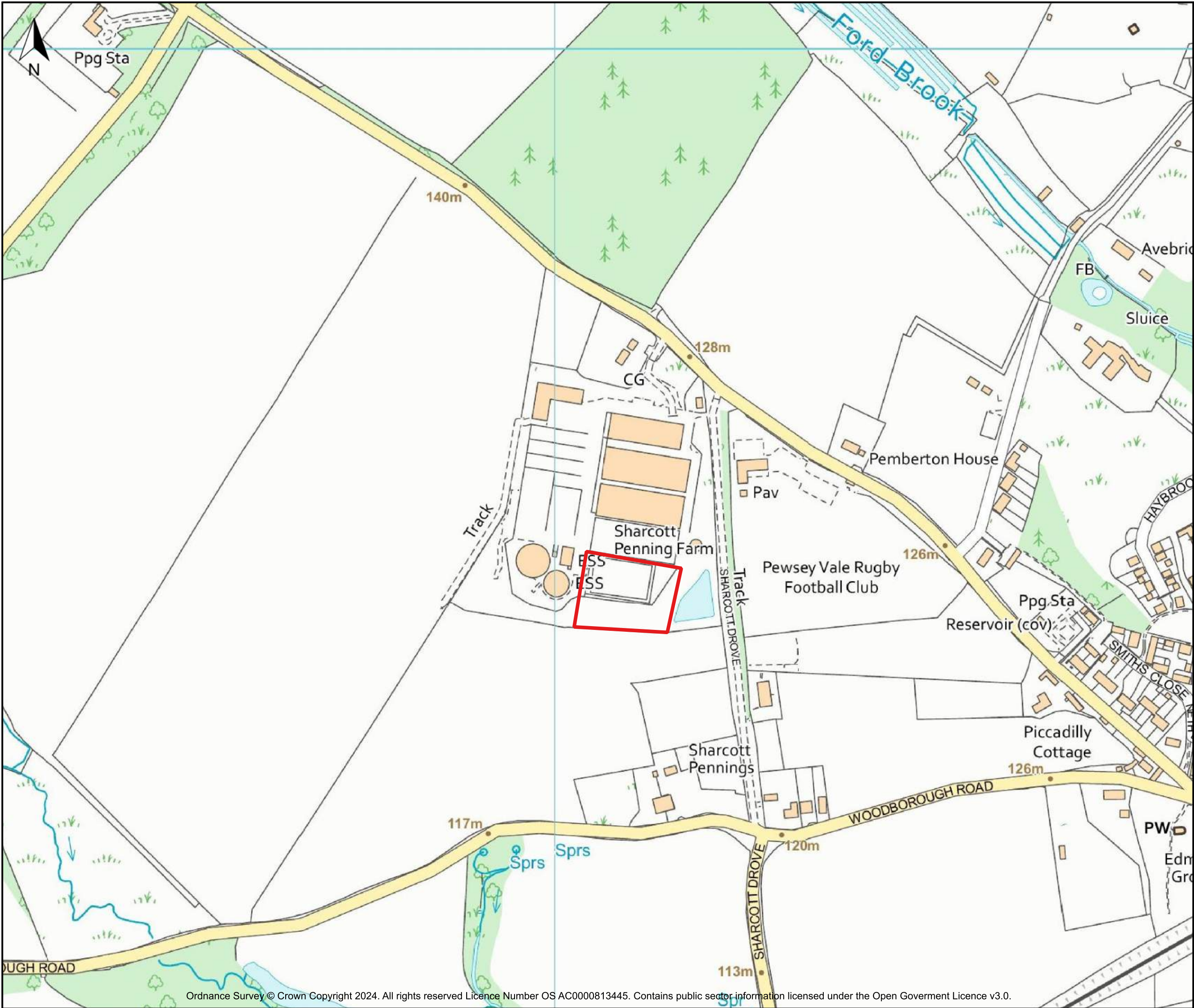
Yours sincerely

A large black rectangular box used to redact the signature of Dr Rob Murdock.

Dr Rob Murdock
Director

Encs: Figure 1.1: Site Location Plan
Figure 2.1: River Avon SAC Catchment Area
Appendix A: Proposed Layout

Figures



Key
 Application Site

Figure 1.1: **Site Location Plan**

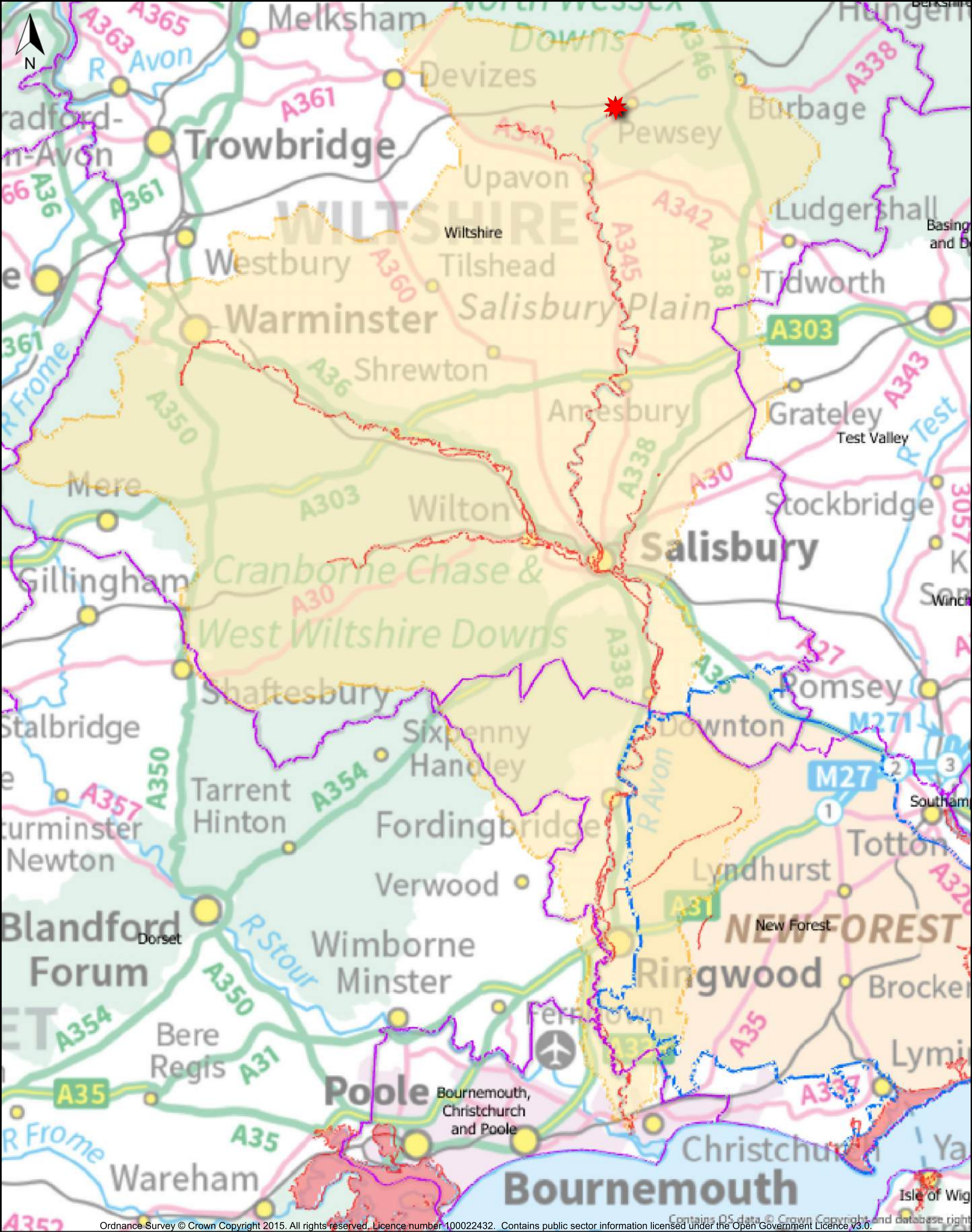
Client: **Stowell Farm**

Project: **Sharcott Pennings Farm**

Project No.: **C2827**



Drawn: MO	Checked: RM	Date: 05/03/2025	Scale: 1:3,500@A3
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Key  Application Site	Figure 2.1: River Avon SAC Catchment Plan					
	Client:	Stowell Farms				
	Project:	Sharcott Pennings Farm				
	Project No.:	C2827				
			Drawn: MO	Checked: RM	Date: 05/03/2025	Scale: 1:225,000@A3

Appendix A: Proposed Layout



SITE PLAN
1:500

revisions	initial	date
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Contractors, Sub Contractors and Suppliers are to check all relevant dimensions and levels of site and buildings before commencing any shop drawings or building work.

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project
SHARCOTT PENNING'S FARM
Pewsey

drawing
Prop Barn - site plan

scale
1:500 @A1

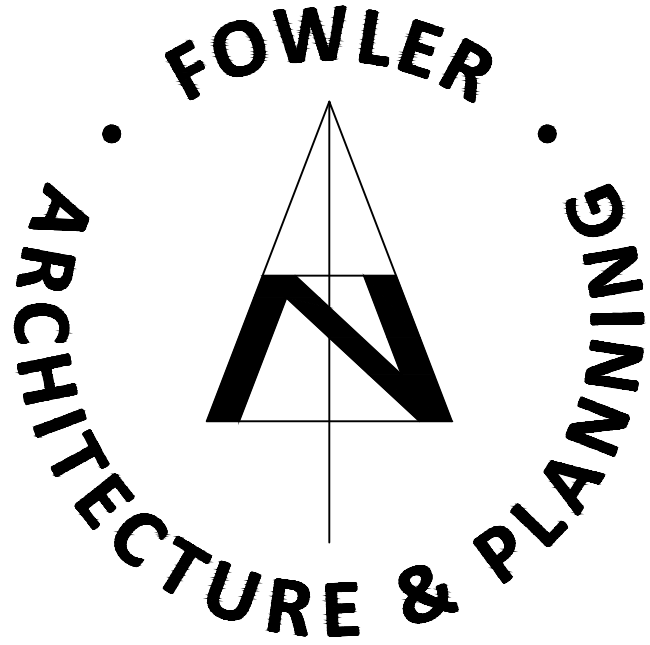
drawn by
DB

date
April 23

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drawing no

rev



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