

Nutrient Statement

Project: Land at Potters Hill, Crockerton
Warminster, BA12 8AB **Date:** 9th April 2026

Subject: Nutrient neutrality **Author:** Nicola French

1.0 Background

- 1.1. This Technical Note has been prepared to provide information to Wiltshire Council (WC) in relation to an application for Permission in Principle for the erection of a single dwelling and associated works on land at Potters Hill, Crockerton, Warminster, BA12 8AB. The information is provided under Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (the Habitats Regulations).
- 1.2. In January 2024, Defra issued a policy paper¹ notifying the designation of sensitive river catchments sensitive to nutrient pollution. This includes the River Avon Special Area of Conservation (SAC), identified as being in unfavourable condition on account of phosphorous pollution². The implication of this is that any local planning authority within the catchment of the Hampshire Avon cannot grant consent for new residential development unless it can be shown to be net phosphorous neutral. A phosphorous calculation is therefore required to ensure that WC has sufficient information to carry out an appropriate assessment to consider impacts of the application on the River Avon SAC.
- 1.3. This note takes full account of all information provided by WC on the Council's dedicated nutrient neutrality website³. The note also draws on the calculator and guidance resources on the Government website *Tools and resources for calculating nutrient neutrality*⁴, most recently updated on 27th May 2025.

¹ January 2024, DEFRA. The Designation of Sensitive Catchment Areas Notice 2024

² <https://www.gov.uk/government/publications/notice-of-designation-of-sensitive-catchment-areas-2024/notice-of-designation-of-sensitive-catchment-areas-2024>

³ <https://www.wiltshire.gov.uk/planning-bio-phosphorous-nitrogen-mitigation>

⁴ <https://www.gov.uk/government/collections/tools-and-resources-for-calculating-nutrient-neutrality>

2.0 Phosphorous budget

- 2.1. **Box 1** below sets out the parameters and assumptions used to assess the additional nutrient loading that will be generated by the new dwelling

Box 1: Assumptions relevant to the assessment of additional nutrient loading for x1 dwelling at Land at Potters Hill, Warminster, BA12 8AB

- **Residential occupancy for the new dwellings:** x1 residential dwelling
- **Occupancy:** 2.4 people based on accepted average occupancy figures
- **Total wastewater produced by single person:** 120 litres per day
- **Method of waste processing:** the proposed residential dwelling is in a rural location where connection to an existing mains sewer system is not possible. Instead, the dwelling will be served by a Graf One2Clean system. This system does not rely on dosing with ferric sulphate or other inorganic compound to optimise phosphate removal. The system is effective at stripping phosphorous from the treated effluent without dosing and certified at 1.6mg TP per litre (**see Appendix 1**).
- **Land use:** the red line area of the development scheme is currently permanent pasture used for grazing livestock. The land use is best described as **lowland**.
- **Land use budget:** The total area of the plot is 0.207ha.
- **Proposed development:** once developed, the land uses and associated areas will change to the **residential urban** land use category.

- 2.2. The most recent Natural England Phosphorous Calculator for the River Avon has been used to calculate the nutrient load generated by the new dwelling.

Water infrastructure information		
Description of required information	Data entry column - user inputs required	Additional data entry column - user inputs may be required
Date of first occupancy (dd/mm/yyyy):	01/07/2027	
Average occupancy rate (people/dwelling or people/unit):	2.40	
Water usage (litres/person/day):	120	
Development proposal (dwellings/units):	1	
Wastewater treatment works:	Package Treatment Plant user defined	
Current wastewater treatment works P permit (mg TP/litre):	Enter value in cell C10	1.6
Not applicable	Not applicable	
Not applicable	Not applicable	
Final calculation of nutrient load from wastewater		
Description of values generated	Values generated	
Wastewater nutrient loading		
Additional population (people):	2.40	
Wastewater by development (litres/day):	288.00	
Annual wastewater TP load (kg TP/yr):	0.17	

- 2.1 The calculations show that the treatment of foul from the new residential unit will generate 0.17 kg of Total phosphorous per year once occupied. Note that the 20%

buffer has not been applied at this stage. Rather it is applied to the final calculation once the overall budget for the site is established.

- 2.3. To address the overall net nutrient budget for the scheme, it is important to also consider how rates of phosphorous leaching from the ground will change in response to a changed land use. Stages 2 & 3 of the calculation assess the Total phosphorous loading to the water environment that is currently taking place and compares this to the loading that will occur once the new residential unit is occupied. Both stages are set out below, using the categorisations and land area set out in Box 1.

Current land use information			
Description of required information	Data entry column - user inputs required		
Operational catchment:	Avon Hampshire		
Soil drainage type:	Freely draining		
Annual average rainfall (mm):	950.1 - 1,000		
Within nitrate vulnerable zone (NVZ):	Yes		
Current land uses			
Existing land use type(s) - user inputs required	Area (ha) - user inputs required	Annual phosphorus export (kg TP/yr)	
Lowland	0.21	0.02	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	
		0.00	

Future land uses		
New land use type(s) - user inputs required	Area (ha) - user inputs required	Annual phosphorus export (kg TP/yr)
Residential urban land	0.21	0.40
		0.00
		0.00
		0.00
		0.00
		0.00
		0.00
		0.00
		0.00
		0.00
		0.00
		0.00
		0.00
		0.00
		0.00
		0.00
		0.00
		0.00
		0.00
Totals:	0.21	0.40

- 2.4. Finally, the calculator generates a net phosphorous loading for the scheme to take account of both loading from treated foul and the change of use of the land for development. This is set out in Stage 4, below.

Total nutrient budget calculations	
Description of values generated	Values generated
Wastewater TP load (kg TP/year):	0.17
Net land use TP change (kg TP/year):	0.38
TP budget:	0.55
TP budget + 20% buffer:	0.66
Annual nutrient budget	
The total annual phosphorus load to mitigate is (kg TP/yr):	0.66

- 2.5. The calculations show that the new residential unit will result in a net loading of **0.66kg** of total phosphorous per year once built and occupied.
- 2.6. To ensure net nutrient neutrality, **mitigation is required** to address the additional nitrogen and phosphorous load that the unit will generate.

3.0 Mitigation

- 3.1. A Council-led scheme to provide phosphorus credits is available for planned development. The credits can be purchased to offset the additional loading identified and demonstrate nutrient neutrality. Wiltshire Council must consider that development schemes are planned development to qualify for the scheme.
- 3.2. This scheme does not fall within the definitions of planned development as set out by Wiltshire Council. However, in the timescales relevant for determination of the permission in principle and subsequent technical details consent, it is expected that the governments scheme for the completion of an Environmental Delivery Plan addressing issues of nutrient neutrality will have delivered in line with the provisions of the Planning & Infrastructure Act 2025⁵. This will provide opportunity to pay into the Nature Restoration Fund to discharge nutrient neutrality obligations.
- 3.3. Alternatively a third-party commercial provider may come forward with an alternative scheme for the purchase of nutrient credits.
- 3.4. In the instance that both alternatives become relevant, a comparison will be undertaken to establish the most cost-effective solution for the delivery of a nutrient neutral scheme. The applicant will secure mitigation through whichever scheme performs best.

4.0 Conclusion

- 4.1. A nutrient budget calculated in line with the current Natural England guidance and calculator for a new residential dwelling at Land at Potters Hill, Warminster, BA12 8AB shows that the proposed scheme will generate a surplus of 0.66kg TP. To mitigate this additional loading, it is expected that the applicant will make a payment into the NRF in due course.
- 4.2. This will ensure that the proposal will not adversely affect the integrity of the River Avon SAC, either alone or in combination with other plans and projects, allowing WC to conclude a positive appropriate assessment under the provisions of the Habitats Regulations.

NF090426

⁵ <https://www.gov.uk/government/publications/nature-restoration-fund-implementation-plan/implementing-the-nature-restoration-fund>