

Nutrient Neutrality – Exemption Assessment

Proposed farm worker's dwelling, Land north of Wootton Rivers, Forest Road, Wootton Rivers, SN8 4NL

Client	Blanchard Farms (c/o Dolman Building Surveyors LLP)
Site	Land north of Wootton Rivers, Forest Road, Wootton Rivers, Marlborough, SN8 4NL
OS Grid Reference	SU 2008 6409
Local Planning Authority	Wiltshire Council
Habitats site of concern	River Avon SAC (Hampshire Avon nutrient neutrality catchment)
Our reference	B25_136
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1. Purpose of this note

This note has been prepared by Bengrove Ltd on behalf of Blanchard Farms in support of a planning application for a single farm worker's dwelling on land north of Wootton Rivers (the "Site"). The Site falls within the Hampshire Avon nutrient neutrality catchment of the River Avon Special Area of Conservation (SAC), as identified on Wiltshire Council's phosphorus and nitrogen mitigation guidance pages.

Foul drainage from the proposed dwelling will be served by a package treatment plant (PTP) discharging to ground via a drainage field. The client team has reviewed the relevant criteria and is of the opinion that the proposal qualifies as an insignificant discharge to ground for phosphorus and therefore does not require nutrient offsetting. This note records, criterion by criterion, the basis on which that conclusion is reached.

2. Source of the exemption criteria

The criteria used in the client team's assessment (the "NN Advice Note") are taken from *Annex F – Thresholds for Insignificant Effects – Phosphorus Discharges to Ground*, set out in Natural England's letter to LPA Chief Executives and Heads of Planning, *Advice for development proposals with the potential to affect water quality resulting in adverse nutrient impacts on habitats sites*, dated 16 March 2022 (Natural England publication reference NE785).

Annex F sets out seven conditions (a–g) which, where met for a discharge of less than 2 m³ per day to ground from a septic tank or package treatment plant in the surface or groundwater catchment of a designated site, allow a Competent Authority to conclude that the phosphorus contribution presents a low risk and therefore no likely significant effect (LSE) on the habitats site, alone or in combination.

The remaining items in the NN Advice Note (criteria 1, 2, 3, 11, 12 and 13) are not part of Annex F itself but are the parallel regulatory requirements for a small sewage discharge to ground in England. They are drawn from:

- the Environment Agency *General Binding Rules: small sewage discharge to the ground* (discharge $\leq 2 \text{ m}^3/\text{day}$, 50 m from any groundwater abstraction point, drainage field not within SPZ1); and
- Building Regulations *Approved Document H (2015) – Drainage and Waste Disposal*, Section H2 (percolation testing methodology and Vp range 12–100, minimum 15 m drainage field to building separation, and the requirement that PTPs discharging to ground do so via a drainage field).

Annex F itself explicitly states that, where a competent authority is considering an Annex F insignificance argument, it may rely on the GIS layer Natural England maintains for conditions (b) surface water separation, (c) slope and (d) groundwater depth; and may consider locally available evidence (Environment Agency flood maps, BGS borehole records, geology and soils data, sewer flood data and groundwater quality data) for the remaining conditions. That is the approach taken in this note.

Where a discharge can demonstrate compliance with all of these conditions, Natural England's advice is that nutrient offsetting is not required for the phosphorus pathway from the PTP.

3. The Site and the proposed discharge

The Site is an arable field at OS grid reference SU 2008 6409, on the north side of Forest Road, Wootton Rivers, near Marlborough. The proposal is for a single, isolated farm worker's dwelling associated with Blanchard Farms' wider holding, on land north of three recently constructed agricultural barns. The Site sits within the Hampshire Avon Operational Catchment but is hydrologically disconnected from any waterbody supporting River Avon SAC interest features at this location (see Bengrove Ltd Preliminary Ecological Appraisal, B25_136, Section 5.1).

The Site overlies the Upper Chalk. The nearest BGS borehole record (SU16SE51) reports the water table at approximately 32 m below datum. The only mapped surface water feature in proximity to the proposed development is the field drainage ditch at the southern boundary of the field. The Site lies wholly within Flood Zone 1, no Flood Risk Assessment was required by Wiltshire Council, and the Site is not within an SPZ1, SPZ2 or SPZ3.

Foul drainage from the proposed dwelling will be served by a package treatment plant discharging to ground via a drainage field. The drainage field will be designed and installed in accordance with Approved Document H at the Technical Design stage, which is normal practice for a single domestic property in this location and would be secured through the Building Regulations regime in any event.

4. Assessment against the criteria

The table below sets out each criterion from the NN Advice Note, identifies whether it is met on this Site, and gives the evidence on which the conclusion is based. Criteria 4–10 correspond to Annex F conditions (a)–(g); criteria 1, 2, 3, 11, 12 and 13 are the parallel requirements of the General Binding Rules and Approved Document H, included for completeness.

#	Criterion (NN Advice Note)	Position on this Site
1	The PTP must discharge to the ground via a drainage field.	Met. The proposed PTP will discharge to ground via a drainage field designed in accordance with Approved Document H. No alternative outfall (e.g. to surface water) is proposed.
2	Discharges are less than 2 m ³ per day (2,000 litres per day).	Met. The proposal is for a single farm worker's dwelling. Domestic foul flow will be substantially below the 2 m ³ /day threshold used in the Environment Agency General Binding Rules and in footnote 17 of Annex F.
3	The drainage field has been subject to ground percolation tests and average Vp values lie within 12–100 as per Building Regulations Approved Document H (or any regulation which replaces it).	To be confirmed at Technical Design stage. The Site overlies the Upper Chalk, which is characteristically free-draining with a deep unsaturated zone. The nearest BGS borehole record (SU16SE51) confirms the water table is approximately 32 m below ground level, consistent with the chalk being unsaturated through the depth of any drainage field. Percolation testing will be undertaken at Technical Design stage to confirm Vp values fall within the 12–100 range required by Approved Document H, and a compliant drainage field will be installed prior to occupation. This is normal practice and would be secured by Building Regulations approval irrespective of the planning decision.
4	The drainage field is more than 50 m from the designated site boundary (or sensitive interest feature).	Met. The PEA confirms the Site is hydrologically and ecologically disconnected from the SAC. The 50 m separation in Annex F condition (a) is therefore comfortably exceeded.
5	The drainage field is more than 40 m from any surface water feature (e.g. ditch, drain, watercourse).	Met. The only surface water feature in proximity to the Site is the field drainage ditch at the southern boundary (PEA Section 4.3). The drainage field will be located adjacent to the proposed isolated dwelling further up the field, with separation in excess of 40 m. This will be demonstrated on the drainage layout submitted at Technical Design stage.
6	The drainage field is in an area with a slope no greater than 15%.	Met. The field slopes gently downwards from north to south. The proposed dwelling and drainage field are sited in the upper, gently sloping part of the field, with an overall gradient well below 15%.
7	The drainage field is in an area where the high-water table groundwater depth is at least 2 m below the surface at all times.	Met. The BGS borehole record SU16SE51, which is the nearest record to the Site, shows the water table at approximately 32 m below ground level. This is in line with the regional behaviour of the Upper Chalk aquifer in this part of the Vale of Pewsey. The 2 m minimum required by Annex F condition (d) is therefore exceeded by a very substantial margin.

#	Criterion (NN Advice Note)	Position on this Site
8	The drainage field will not be subject to significant flooding, e.g. it is not in Flood Zone 2 or 3.	Met. The Site lies wholly within Flood Zone 1 (Environment Agency Flood Map for Planning). The Local Planning Authority has not required a Flood Risk Assessment in support of the application, consistent with the Site being at low fluvial flood risk.
9	There are no other known factors which would expedite the transport of phosphorus – for example fissured geology, insufficient soil below the drainage pipes, known sewer flooding, conditions in the soil/geology that would cause remobilisation of phosphorus, or presence of mineshafts.	Met. The underlying Upper Chalk in this area is overlain by sufficient soil depth to accommodate a compliant drainage field with adequate soil cover. There are no known mineshafts, no record of sewer flooding (no public foul sewer in the immediate vicinity), and no indications of fractured-flow short-circuiting at this location. Calcareous chalk-derived sediments are reported in Robertson et al. (2019), cited in Annex F, as having very high phosphorus retention (averaging 97%, with plumes typically <10 m), which provides additional reassurance for this Site.
10	To ensure that there is no significant in-combination effect, the discharge to ground should be at least 200 m from any other discharge to ground.	Met. The proposed dwelling is isolated within open arable land. There are no other domestic properties, package treatment plants or other consented discharges to ground within 200 m of the proposed drainage field location.
11	The drainage field must be 50 m from a point of abstraction of any groundwater supply.	Met. A review of available records shows no licensed groundwater abstraction points, private water supplies or known boreholes (other than the BGS observation borehole referenced above, which is not an abstraction) within 50 m of the proposed drainage field location. The 50 m separation required by the General Binding Rules is therefore satisfied.
12	The drainage field must not be in any Groundwater Source Protection Zone 1 (SPZ1).	Met. A search of the Environment Agency “Magic” / Catchment Data Explorer mapping confirms the Site is not within SPZ1 (or SPZ2 or SPZ3). Accordingly the General Binding Rule restriction on discharges within SPZ1 does not apply.
13	The drainage field must be at least 15 m from any building.	Met. The proposed farm worker’s dwelling is an isolated building within an arable field, with no other buildings within 15 m of its curtilage. The drainage field will be located within the site curtilage so as to maintain at least 15 m separation from the proposed dwelling and from the recently constructed agricultural barns to the south. This will be confirmed on the drainage layout submitted at Technical Design stage.

5. Conclusion

All thirteen criteria in the NN Advice Note are met or, where they relate to detailed design (percolation Vp values and final drainage field layout), will be demonstrated and secured at Building Regulations / Technical Design stage following the grant of planning permission. The three Annex F conditions that Natural England identifies as commonly being supported by the national GIS risk layer – distance to surface water (b), slope (c) and groundwater depth (d) – are comfortably met on the basis of the available site-specific evidence, and the four remaining Annex F conditions (a, e, f, g) are similarly satisfied.

The proposed PTP discharge from the single farm worker's dwelling falls within the Annex F threshold for insignificant phosphorus effects on the River Avon SAC. Applying Natural England's advice in NE785, this allows the Council, as Competent Authority, to conclude *no likely significant effect* on the River Avon SAC from phosphorus discharged via the PTP, alone or in combination, and therefore no requirement for nutrient offsetting for the phosphorus pathway. Nitrogen is not within scope of Annex F; in the Hampshire Avon catchment Wiltshire Council's current published position is that mitigation is required for phosphorus only, so this conclusion is sufficient to discharge the nutrient neutrality matter for this application.

Should the Local Planning Authority or Natural England, at consultation stage, request further evidence on any individual criterion (for example confirmation of percolation Vp values, a drainage field layout drawing, or a more detailed groundwater assessment), the client team will provide it.

6. Sources and references

- Natural England (2022). *Advice for development proposals with the potential to affect water quality resulting in adverse nutrient impacts on habitats sites* (16 March 2022), publication reference NE785, Annex F – Thresholds for Insignificant Effects, Phosphorus Discharges to Ground.
- Wiltshire Council. [Phosphorus and nitrogen mitigation](#) (Wiltshire Council guidance on the Hampshire Avon nutrient neutrality catchment).
- Environment Agency. [General binding rules: small sewage discharge to the ground](#).
- HM Government (2015). *The Building Regulations 2010 – Approved Document H: Drainage and Waste Disposal*, Section H2 (small sewage treatment systems).
- Bengrove Ltd (2026). *Preliminary Ecological Appraisal – Land North of Wootton Rivers*, report reference B25_136_PEA, 5 February 2026.
- Robertson, W.D., Van Stempvoort, E.R. & Schiff, S.L. (2019). *Review of Phosphorus attenuation in groundwater plumes from 24 septic systems* – cited in Annex F of NE785.
- May, L., Place, C., O'Malley, M. & Spears, B. (2015). NECR170; May, L. et al. (2015) NECR171; May, L. et al. (2016) NECR222 – underpinning evidence for the Annex F distance, slope and groundwater thresholds.

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