



Nutrient Neutral response to ecologist comments on proposed development at Bishopstone.

Date: 17th June 2026

Introduction

This statement has been prepared in support of the planning application for the erection of 9 no. dwellings, including 4 affordable homes, with associated infrastructure at Land at Whitlocks, Bishopstone, Wiltshire (Application Ref: PL/2026/00843).

The purpose of this statement is to respond to the comments raised by Wiltshire Council in the Planning Consultation response issued by the Wiltshire Council Ecologist, dated 30 April 2026, in relation to the submitted Nutrient Neutrality calculation and supporting documentation.

The Ecologist's comments are set out below, with each point reproduced in ***bold italics*** for clarity. A detailed response is provided beneath each point.

Package Treatment Plant

The proposed PTP is not included on the list of certified PTPs (List of Certified Small Wastewater Treatment Systems Up to 50PT) accepted by NE. It would appear that this PTP also uses chemical dosing which would require a management and monitoring plan to be submitted in support of its use.

The proposed Fuji Clean package treatment plant (PTP) is a biological treatment system that achieves wastewater treatment through natural aerobic biological processes. The system does not rely upon chemical dosing as part of its treatment process and therefore no chemical inputs are required for its operation. Consequently, a management and monitoring plan relating to chemical dosing is not considered necessary.

The Fuji Clean system is certified to the relevant British Standards and is included on the British Water list of approved treatment systems. In addition, Fuji Clean systems have been utilised as part of the septic tank upgrade programme delivered by Norfolk Environmental Credits within nutrient neutrality catchments, where Natural England has been consulted on the septic tank upgrade framework. This demonstrates that the technology has been considered suitable for use within environmentally sensitive locations, subject to the relevant site-specific assessment and regulatory requirements.

Given that the system provides biological treatment without the use of chemical dosing, and is a recognised and certified treatment technology, it is considered that the proposed Fuji Clean PTP represents an appropriate wastewater treatment solution for the development.

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Water Usage Assumptions

Water use is proposed to be 95l/p/d, information on how this will be achieved must be submitted in support of the application.

A water usage rate of 95 litres per person per day (l/p/d) has been applied within the nutrient neutrality calculation. This approach is based on advice provided by Natural England, as set out in correspondence with John Stobart (Planning and Conservation Senior Officer).

Natural England's advice confirms that nutrient neutrality calculations should be based on a precautionary water use figure and incorporate an additional 10 l/p/d buffer to ensure robustness within the Habitats Regulations Assessment (HRA). Specifically, the correspondence advises that emerging Local Plan water efficiency standards of 85 l/p/d should be used where applicable, with the addition of a 10 l/p/d precautionary allowance, resulting in a nutrient budgeting figure of 95 l/p/d.

The use of 95 l/p/d in this instance therefore represents a precautionary approach that is consistent with Natural England's guidance and ensures that the nutrient assessment does not underestimate wastewater generation.

It should be noted that the 95 l/p/d figure is a nutrient calculation assumption rather than the proposed operational water efficiency standard for the development. The development will be designed to achieve a water efficiency standard of 85 l/p/d through the specification of water-efficient fixtures and fittings, in accordance with emerging Local Plan policy requirements. Compliance with this standard can be demonstrated at the detailed design stage and secured through the planning process.

Accordingly, the nutrient neutrality assessment is based on a precautionary wastewater generation rate, whilst the development itself will be designed to achieve the lower water consumption target of 85 l/p/d.

Existing Land Use Clarification

Amendment of current land use as it appears to be used for grazing/agriculture rather than commercial/industrial

It is assumed that this comment relates to those areas currently classified as commercial/industrial land use that do not comprise hardstanding surfaces.

For the existing cattle yard areas that comprise hardstanding, the commercial/industrial urban land use category is considered the most appropriate classification. Natural England has advised that the historic cattle yard methodology is no longer accepted, and the commercial/industrial export coefficient provides the most suitable proxy for hardstanding areas associated with agricultural operations. Photographic evidence has been included within the appendix to demonstrate the extent of hardstanding present and to confirm the existing use of these areas.

Notwithstanding the above, the NNAMS assessment has been reviewed and amended in response to the comment. The land use areas have been remeasured using GIS, and the commercial/industrial urban land use classification is now applied only to those areas comprising hardstanding. This approach is considered to provide the most accurate representation of phosphorus export associated with runoff from these surfaces.

Areas that do not comprise hardstanding have been reclassified to either lowland grazing or greenspace, as appropriate. This revised methodology ensures that the baseline land use assessment more accurately reflects existing site conditions whilst maintaining a precautionary approach to the nutrient budget calculation.

The amended NNAMS report reflects these revised land use classifications and updated area measurements.

Surface Water Drainage and SuDS Strategy

The proposed SUDS should be amended as discharging to ground is a like for like as the surface water already discharges to ground The calculation must be amended to address these issues, or suitable justification provided, and resubmitted to the Council for approval. The calculation must be approved by the council to enable the AA to be undertaken, which must be completed, and the conclusion agreed with Natural England prior to the application being determined. Guidance on completing the phosphorus budget is available on our website (Phosphorus and nitrogen mitigation - Wiltshire Council). This webpage also contains information on the options available for developments to achieve nutrient neutrality.

The nutrient calculation has been completed using the Modified Rational Method (MRM), following advice provided by Natural England in correspondence dated 9 October 2024. The MRM is a recognised and widely accepted approach for estimating runoff volumes from developed areas comprising impermeable surfaces. By accounting for site-specific characteristics and rainfall inputs, it provides a more representative assessment of surface water runoff. The resulting runoff volumes have been incorporated within the SuDS section of the nutrient calculator as per the Natural England consultation on this site.

The proposed drainage strategy should not be considered a direct like-for-like replacement of the existing situation. Under the current arrangement, runoff from hardstanding areas is unmanaged and receives no formal treatment prior to infiltration. In contrast, the proposed development incorporates sustainable drainage features designed in accordance with current SuDS principles, providing attenuation and water quality treatment prior to discharge.

The MRM has only been applied to the proposed residential development areas. In addition, following review of the existing land use assessment, the pre-development commercial/industrial land use areas have been revised using GIS-measured hardstanding extents only. This provides a more accurate representation of existing runoff characteristics and results in a nutrient assessment that is both representative of site conditions and precautionary in nature.

Accordingly, it is considered that the nutrient calculator has been completed using an appropriate methodology and that the proposed SuDS strategy delivers an improvement in surface water quality when compared with the existing baseline conditions.

Conclusion

In summary, the nutrient calculation and supporting information have been prepared in accordance with current guidance, recognised methodologies, and advice received from Natural England. The proposed wastewater treatment solution, water usage assumptions, baseline land

use classifications, and surface water drainage assessment have all been reviewed in response to the comments received and are supported by appropriate technical justification.

The submitted information addresses the points raised by the Council's ecologist and therefore it is considered that sufficient information has been provided to inform the Council's Habitats Regulations Assessment and Appropriate Assessment.