

Nutrient Statement

Project:	Old Manor Farm, Wedhampton, Devizes	Date:	16 th January 2026 Updated 1 st July 2026
Subject:	Nutrient budget	Author:	Nicola French

1.0 Background

- 1.1. This Technical Note has been prepared to provide information to Wiltshire Council (WC) in support of a Planning Application for the conversion of six existing barns into four new residential dwellings and a new access at Old Manor Farm in Wedhampton, Devizes. 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, required to approve the planning application.
- 1.3. This note takes full account of all information provided by WC on the Council's dedicated nutrient neutrality website³ and 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.

2.0 Nutrient neutrality calculations

- 2.1. **Box 1** on the following page sets out the parameters and assumptions used to assess the additional phosphorous loading that the new dwelling will generate.

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>

Box 1: Assumptions relevant to the assessment of additional nutrient loading for x4 new residential dwellings on land at Old Manor Farm, Wedhampton

- **Residential occupancy for the new dwellings:** 2.4 occupants
- **Total wastewater produced by single person:** 120 litres per day. The applicant does not wish to progress using the smaller 85 litres per day water consumption rate offered as an option by Wiltshire Council.
- **Method of waste processing:** foul waste will be processed at Wedhampton Waste Water Treatment Works (WWTW).
- **Total plot area:** The total area of the plot is 2918m² (0.292ha).

Land use: The site comprises several disused barns and associated areas of hard standing, with limited green space.

The nutrient calculator does not include a category for this type of land use but government guidance for use of the calculator states '*If there is a land use within the development area that is not in the list, select the most similar land use type.*' Wiltshire Council has advised that the existing use must take account of previous agricultural processes and run-off. The **Mixed** agricultural land use has therefore been selected.

- **Proposed development:** The residential scheme, once developed, is classed as **residential urban land** (0.292ha) and will not result in a change of land use.

2.2. The most recent Natural England Phosphorous Calculator for the River Avon has been used to calculate the nutrient load generated by the treated foul from the new residential unit.

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):	01/01/2027	
Average occupancy rate (people/dwelling or people/unit):	2.40	
Water usage (litres/person/day):	120	
Development proposal (dwellings/units):	4	
Wastewater treatment works:	Wedhampton	
Current wastewater treatment works P permit (mg TP/litre):	8.00	
Not applicable	Not applicable	
Post 2030 WwTW P permit (mg TP/litre):	4	
Final calculation of nutrient load from wastewater		
Description of values generated	Values generated	
Post-2030 wastewater nutrient Loading		
Additional population (people):	9.60	
Wastewater by development (litres/day):	1152.00	
Annual wastewater TP load (kg TP/yr):	1.51	
Pre-2030 wastewater nutrient loading		
Annual wastewater TP load (kg TP/yr):	3.37	

2.3. The calculations show that the treatment of foul from the new residential unit will generate **3.37kg** of Total Phosphorous per year in the period up to 2030

prior to the upgrade of the Wedhampton WWTW, and **1.51kg** TP per year thereafter. 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.

- 2.4. The pre and post loadings derive from the requirements of the Levelling up and Regeneration Act 2023, which imposes a new duty on Wessex Water to ensure wastewater treatment works serving populations of 2,000 or more meet specified nutrient removal standards. Local planning authorities considering planning proposals for development are required to consider that the nutrient pollution standard will be met by the upgrade date for the purposes of their Habitats Regulations Assessments⁵. It is therefore reasonable to assume that the loading will reduce on upgrade of Wedhampton WWTW in 2030.
- 2.5. 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 site has been developed. For this scheme, stages 2 & 3 cancel out because there is no change in land use. The total nutrient loading therefore derives from just the loading that will arise from treatment of foul from the four new residential dwellings. For completeness, both stages are set out below, using the categorisations and land area set out in Box 1.

⁵ <https://www.gov.uk/guidance/nutrient-neutrality-update>

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):	800.1 - 850	
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)
Mixed	0.29	0.03
		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:	0.29	0.03

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	0.29	0.48
		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:	0.29	0.48

- 2.6. 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):	1.51
Net land use TP change (kg TP/year):	0.45
TP budget:	1.96
TP budget + 20% buffer:	2.35
Annual nutrient budget	
The total annual phosphorus load to mitigate is (kg TP/yr):	2.35
Pre-2030 nutrient budget	
The total annual phosphorus load to mitigate is (kg TP/yr):	4.59

- 2.7. The calculations show that conversion of six existing barns into four new dwellings on Old Manor Farm will generate **4.59kg** of total phosphorous per year once built out and occupied pre 2030, dropping to **2.35kg** total phosphorous post 2030.
- 2.8. To ensure net nutrient neutrality, **mitigation is required** to address the additional phosphorous load that the new dwelling 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 is planned development because it falls under Core Policy 2 as a proposal within a settlement boundary.
- 3.3. As a minor application, guidance on the Wiltshire Council website states that consent can be granted through use of a Grampian condition. This will allow the application to be determined, with a payment due on commencement of the development. The charge covers the cost of delivery of the mitigation projects and is re-invested back into delivering further mitigation projects.

- 3.4. Wiltshire Council has indicated that it may not have availability of credits in the relevant sub-catchment of the River Avon. However, in the timescales that are relevant, it is anticipated that Natural England will have published their Environmental Delivery Plan addressing issues of nutrient neutrality and that alternative means of securing mitigation will be available.

4.0 Conclusion & analysis

- 4.1. A nutrient budget calculated in line with the current Natural England guidance and calculator for four new residential dwellings at Old Manor Farm, Wedhampton shows that the proposed scheme will generate increased loading of 4.58kg TP per year prior to 2030 dropping to 2.35kg TP per year post 2030.
- 4.2. To offset this additional loading, and in line with advice available from WC's website, consent can be granted with a Grampian condition precluding the start of development until mitigation has been secured from WC's own mitigation scheme, or other, alternative ratified scheme if it becomes available. With this condition in place, WC can conclude that the proposed residential property will not adversely affect the integrity of the River Avon SAC, either alone or in combination with other plans and projects.

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