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FAO Jade Palmer

Ref: 24124

Manor Farm, Collingbourne Kingston, Wilts, SN8 3SD
Nutrient Assessment and Statement

Dear Sirs

Further to the your email we understand that the LPA sought clarification of the following:

- 1 The PTP and drainage field are not shown on site plans. This information should be shown on plans.
- 2 Conditions (c), (d) and (f) of Natural England methodology 16 March 2022- Annex F. Further information/clarification required.
- 3 Annex F Condition (g). There is an existing slurry pit to the northeast of site that may be contributing to nutrient discharge. The submission has not addressed the potential for this to be an in-combination effect. Details on the existing slurry pit should be provided as an in-combination effect must be ruled out. This may include plans and specs of slurry pit containment.

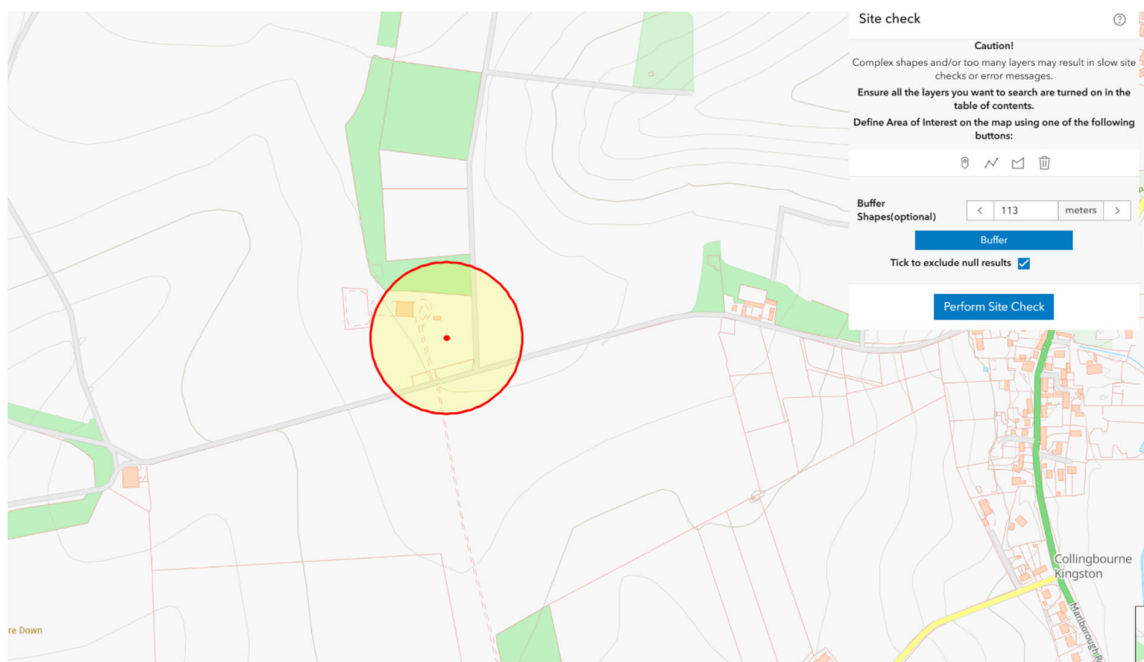
- 1) You have updated your site plan to address this.
- 2) (c) I note from google earth interrogation tools that the ground level variation appears to be no more than 1m over a site parcel width of about 50m ie slope cannot be more than 2% so well below 15 degrees.

(d) The site is located on a hilltop in a region of very thick permeable chalk geology at some 184mAOD, some 50m above the valley floor at 134mAOD. We conclude from this that groundwater level at the site is significantly >2mbgl. BGS borehole record SU25NW14 for Mill Drove Parsonage Farm at some 168m AOD determined a ground water level of some 43mbgl so considerably more than 2mbgl, and Manor Farm is located at the top of the same hill at 16m greater elevation so would have a greater height above groundwater level, also much greater than 2mbgl.

(f) I do not know there to be any other factors.

- 3) (g) Only residential sewage forms part of the assessment. Whilst animal waste may be placed in a slurry pit rather than be present in the same amount in other distribution is incidental as the land use on the farm is existing and the development proposal does not change the land use type elsewhere on the farm (including slurry pit) and does not change the land use so would not change the nutrient. Footnote 22 to (g) states this is looking at the relationship between 2 drainage fields to 2 septic tanks..... (1) the slurry pit is NOT a septic tank; (2) the slurry pit is NOT a drainage field and (3) the nutrient methodology relates only to residential occupancy sewage and the slurry pit is not residential occupancy sewage. footnote 22 continues that the aim is that 'these systems' meaning drainage fields to septic tanks is to seek to get only 1 residential discharge per 4 ha (40,000m²) ie radius of 113m to each 4 Ha cell. the next nearest residential property (and its discharge is well beyond 113m

You should also note that a slurry pit is generally an open holding tank and the farmer then later muck spreads the slurry back onto his fields in accordance with DEFRA farming practices. So the nutrients in the slurry arising from the land use farming activity are distributed onto the land and in effect give the same distribution of the same animal waste as were the cattle permanently free ranging the site and give the land use nutrient values.



Furthermore a default septic tank 11.6 mg/L TP could be installed under the same Annex F below threshold but the applicant proposes a PTP at 1.6 mg/L which lowers TP by 87% of a septic tank baseline value

Yours Sincerely,

Aqua Callidus Consulting Ltd

Andy Traves