

Nutrient Statement

Project: 3 Lower Marsh Road,
Warminster, BA12 9PB

Date: 19th August 2026

Subject: Nutrient budget

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1.0 Background

- 1.1. This Technical Note has been prepared to provide information to Wiltshire Council (WC) in support of a full planning application for the erection of three dwellings with garaging at 3 Lower Marsh Road, Warminster. 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. 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 2025⁵.

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>

⁵ <https://www.gov.uk/government/publications/river-avon-sac-nutrient-neutrality-calculator>

2.0 Nutrient neutrality calculations

2.1. **Box 1** below sets out the parameters and assumptions used to assess the additional phosphorous loading that the three new dwellings at Lower Marsh Road will generate.

Box 1: Assumptions relevant to the assessment of additional nutrient loading for x3 new residential dwellings at 3 Lower Marsh Road

- **Residential occupancy for the new dwellings:** 2.4 occupants
- **Total wastewater produced by single person:** 120 litres per day on the basis that the applicant does not wish to have to have a water restrictive planning condition to use a maximum of 85 litres per person per day, an option provided by Wiltshire Council.
- **Method of waste processing:** foul waste will be processed at Warminster Waste Water Treatment Works (WWTW)
- **Total plot area:** The total area of the plot is 0.2ha.
- **Land use:** the site comprises pasture used as a pony paddock and three buildings offering stabling, with associated hard standings. Taken together, the existing land use is best described as **Mixed**.
- **Proposed development:** The scheme, once developed, is classed as **residential urban land** (0.20ha).

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 three new residential units.

Water infrastructure information	
Description of required information	Data entry column - user inputs required
Date of first occupancy (dd/mm/yyyy):	01/01/2029
Average occupancy rate (people/dwelling or people/unit):	2.40
Water usage (litres/person/day):	120
Development proposal (dwellings/units):	3
Wastewater treatment works:	Warminster WwTW
Current wastewater treatment works P permit (mg TP/litre):	0.50
Not applicable	Not applicable
Post 2030 WwTW P permit (mg TP/litre):	0.25
Final calculation of nutrient load from wastewater	
Description of values generated	Values generated
Post-2030 wastewater nutrient Loading	
Additional population (people):	7.20
Wastewater by development (litres/day):	864.00
Annual wastewater TP load (kg TP/yr):	0.07
Pre-2030 wastewater nutrient loading	
Annual wastewater TP load (kg TP/yr):	0.14

- 2.3. The calculations show that the treatment of foul from the three new units will generate **0.14kg** of Total Phosphorous per year in the period up to 2030 prior to the upgrade of the Warminster WWTW, and **0.07kg** 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 Assessments⁶. It is therefore reasonable to assume that the loading will reduce on upgrade of Warminster 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 site, the land use pre and post development are set out on the following page.

⁶ <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):	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)
Mixed	0.20	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
Totals:	0.20	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	0.20	0.39
		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:	0.20	0.39

- 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):	0.07
Net land use TP change (kg TP/year):	0.36
TP budget:	0.43
TP budget + 20% buffer:	0.51
Annual nutrient budget	
The total annual phosphorus load to mitigate is (kg TP/yr):	0.51
Pre-2030 nutrient budget	
The total annual phosphorus load to mitigate is (kg TP/yr):	0.59

- 2.7. The calculations show that the x3 new residential dwellings will generate **0.59kg TP** per year pre 2030, dropping to **0.51kg TP** per year post 2030.
- 2.8. To ensure net phosphorous neutrality, **mitigation is required** to address the additional phosphorous load that the units 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. The site already benefits from fallback position with outline consent granted for 3 residential units in April 2026. Although located outside of the settlement boundary of Warminster, the site lies immediately adjacent such that future occupants will benefit from a comparable access to amenities and facilities to existing occupiers within Warminster. The presumption in favour of sustainable development therefore applies and given too the balance of consideration given to the Wiltshire's housing land supply position, it is expected that the Council will enable the scheme through allocation of phosphorus credits.
- 3.3. Development in Warminster can rely on good credit availability in the Upper Wylye sub-catchment, which is able to offset new and additional loading from the treatment of foul through Warminster WWTW.

- 3.4. 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. A Credit Screening Approval Certificate to progress purchase of credits will be sought from the planning officer on determination of the application.

4.0 Conclusion & analysis

- 4.1. A nutrient budget calculated in line with the current Natural England guidance and calculator for three new residential dwellings on land at 3 Lower Marsh Road, Warminster shows that the proposed scheme will generate increased loading of 0.59kg TP per year prior to 2030 dropping to 0.51kg 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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