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<b>PROJECT</b>	Kingsnorth Medical Centre Ashford		<b>CLIENT</b>	Jarvis Homes		
<b>TITLE</b>	Nutrient Neutrality Compliance Report		<b>REFERENCE</b>	22125-NUT-TN-04	C01	
<b>AUTHOR</b>		<b>CHECKER</b>		<b>APPROVER</b>		
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<b>REV</b>	<b>COMMENTS</b>		<b>DATE</b>	<b>AUTH</b>	<b>CHKR</b>	<b>APPR</b>
C01	Issued for Planning		29/04/2026	MW	CMG	GL

## 1 Introduction

- 1.1 This Technical Note has been prepared by Water Environment Ltd to support the Reserved Matters application for the approval of appearance, landscaping, layout and scale of the residential element comprising 15 dwellings, pursuant to planning permission PA/2022/2851 (Appeal Reference: APP/E2205/W/23/3322574).
- 1.2 The purpose of this note is specifically to address nutrient neutrality compliance and to confirm that the development remains fully neutral in accordance with the Nutrient Neutrality Assessment and Mitigation Strategy (NNAMS) submitted and approved as part of the original outline planning application.
- 1.3 The Reserved Matters application incorporates minor amendments to the approved layout. Water Environment Ltd has reviewed these changes and re-measured and recalculated the nutrient budget using the updated layout. This review confirms that the development continues to achieve nutrient neutrality, consistent with the conclusions of the original approved NNAMS. No changes to the approved mitigation strategy are therefore required.

## 2 Summary of Nutrient Neutrality Submissions

- 2.1 For context, this section provides a summary of the documents prepared by Water Environment Ltd in relation to nutrient neutrality for this development. This information has been set out previously; however, it is summarised below to support this compliance statement.

### *Nutrient Neutrality Assessment and Mitigation Strategy (NNAMS)*

- 2.2 A Nutrient Neutrality Assessment and Mitigation Strategy<sup>1</sup> was submitted in support of the outline planning application for the proposed development at Land east of Ashford Road, Kingsnorth (Planning

<sup>1</sup> Water Environment Ltd (November 2022) Kingsnorth Medical Centre, Ashford. Nutrient Neutrality Assessment and Mitigation Strategy. Ref: 22125-NUT-RP-01 C01

Reference: PA/2022/2851). This assessment confirmed that the proposed development would achieve nutrient neutrality, and planning permission was granted at appeal on this basis.

#### *NNAMS Addendum – Further Information on Land Use*

2.3 Following a request from Ashford Borough Council (ABC) for clarification regarding existing and proposed land use, Water Environment provided a NNAMS Addendum Technical Note<sup>2</sup> which was prepared and submitted to address these matters in full.

#### *NNAMS Addendum – SuDS Phosphorus Removal*

2.4 Subsequent to the outline submission, updated guidance on phosphorus removal via sustainable drainage systems was published in CIRIA C808<sup>3</sup>. Water Environment Ltd prepared another NNAMS Addendum Technical Note<sup>4</sup>, which demonstrated that the proposed SuDS strategy comfortably achieves the phosphorus removal efficiencies set out in CIRIA C808, based on the approved drainage design.

### This Compliance Report

2.5 This Technical Note has been prepared as a nutrient neutrality compliance report to accompany the Reserved Matters application. It confirms that, notwithstanding minor layout amendments, the development remains nutrient neutral in accordance with NNAMS under the approved outline application, and that no changes are required to the original nutrient mitigation strategy.

## **3 Updated Land Use and Nutrient Budget**

- 3.1 As previously stated, the proposed development has undergone minor layout amendments as part of the Reserved Matters application. These amendments have been reviewed to confirm whether they have any implications to the mitigation strategy.
- 3.2 The existing land use remains unchanged from that designated within the approved NNAMS.
- 3.3 Table 1 below compares the future land use designated in the original outline planning application with the revised land use proposed under the reserved matters application.

**Table 1: Comparison Table**

	<b>Future Land Use (Outline)</b>	<b>Future Land Use (RM)</b>
Commercial/Industrial	1.02 ha	1.03 ha
Residential Urban	1.46 ha	1.24 ha
Greenspace	2.59 ha	2.80 ha

3.4 As shown, the land use changes are minor, with a small reduction in Residential Urban land and a corresponding increase in Greenspace. These changes represent a slight improvement in nutrient terms when compared to the outline position.

### **Nutrient Budgets**

- 3.5 The original nutrient budget for the outline application was calculated as:
- Unmitigated Budget: -2.92 kgN/yr and 0.20 kgP/yr

<sup>2</sup> Water Environment Ltd 17/02/2023) Kingsnorth Medical Centre, Ashford. NNAMS Addendum – Land use types. Ref: 22125-NUT-TN-01 C02

<sup>3</sup> Bradley, J, Haygarth, P, Stachyra, K and Williams, P (2022). Using SuDS to reduce phosphorus in surface water runoff, C808, CIRIA, London, UK.

<sup>4</sup> Water Environment Ltd 09/05/2023) Kingsnorth Medical Centre, Ashford. NNAMS Addendum – SuDS Guidance Update. Ref: 22125-NUT-TN-02 C02

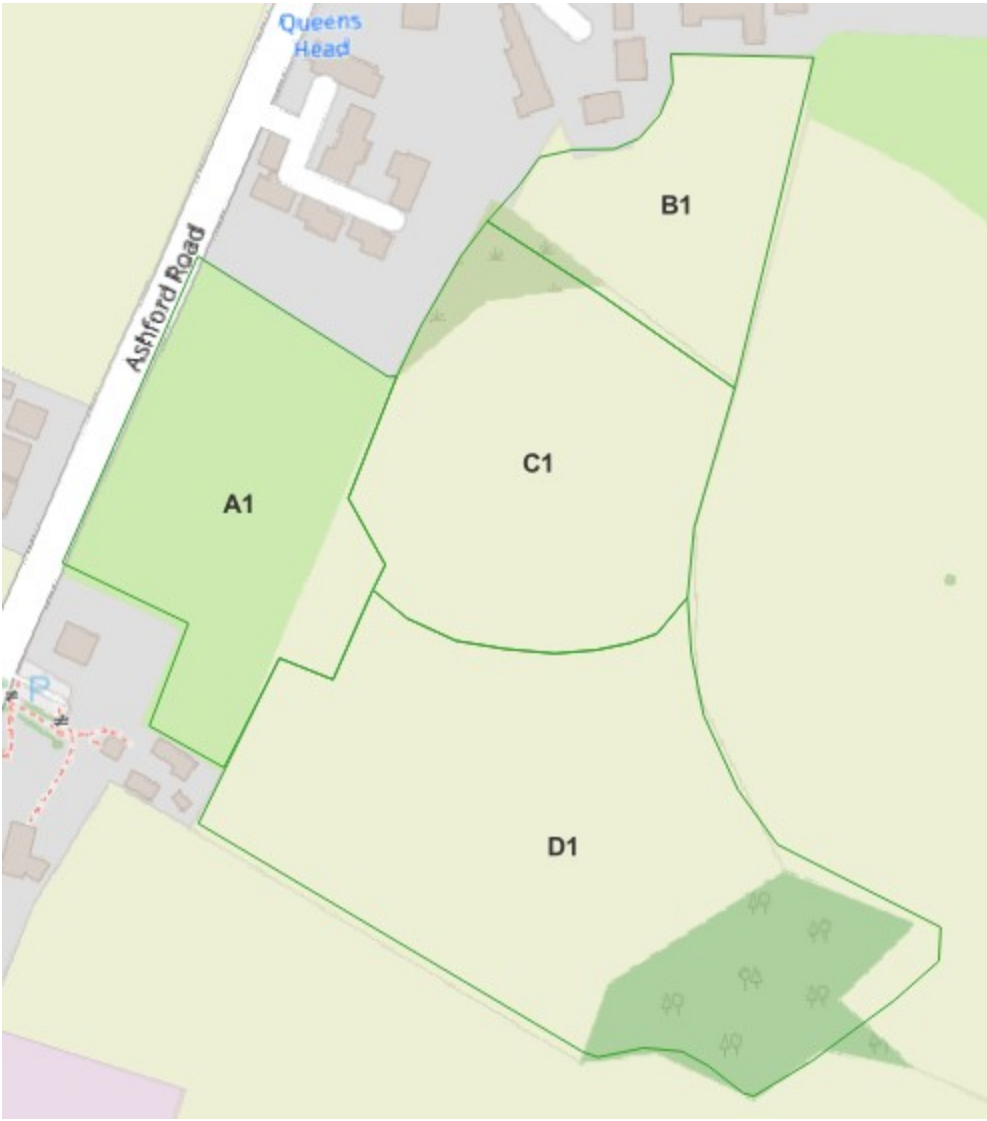
- Mitigated Budget: -2.92 kgN/yr and -0.02 kgP/yr
- 3.6 The revised land use areas have been input into the nutrient budget calculation using the same methodology and assumptions as the approved NNAMS. The mitigation strategy remains unchanged, including the consideration of phosphorus removal via SuDS, consistent with the original assessment.
- 3.7 The updated nutrient budget calculations are shown below:
- **Unmitigated Budget: -5.20 kgN/yr and -0.14 kgP/yr**
  - **Mitigated Budget: -5.20 kgN/yr and -0.31 kgP/yr**
- 3.8 Overall, the updated assessment confirms that the development remains nutrient neutral, fully in accordance with the conclusions of the approved NNAMS.

#### **4 Conclusion**

- 4.1 The Reserved Matters layout amendments have been reviewed and the nutrient budget updated accordingly.
- 4.2 This confirms that the development continues to achieve nutrient neutrality, with a slight betterment compared to the approved outline position.
- 4.3 The conclusions of the approved NNAMS therefore remain valid and the original mitigation strategy remains appropriate and unchanged.

## **Appendix A**

- Updated Future Land Use (Reserved Matters Layout)
- Nutrient Budget Calculations (Reserved Matters)



## Nutrient Neutrality Calculations Unmitigated



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<i>Reference</i> <b>22125-NUT-CA-01</b>	<i>Revision</i> <b>P02</b>	<i>Sheet</i> <b>1</b>
<i>Client</i> Jarvis Homes and Pentland Homes		
<i>Project</i> Kings North Medical Centre		
<i>Author</i> Gareth Snyman		
<i>Checker</i> NA		
<i>Date</i> 29/04/2026		

Standard Average Annual Rainfall (mm)	722	Soil Type	Impeded Drainage
Nitrate Vulnerable Zone	TRUE	Catchment	Upper Stour

### Stage 1 - Total Nutrient Load from Development Wastewater

Measurement	Value	Unit	Reference
New Dwellings	15	number	
Average Occupancy	2.4	persons/dwelling	
Future Population	36.0	persons	
Water Use	120	litres/person/day	
Wastewater Discharging to: Ashford WwTW		epoch	
		TN	
Licence Limits (mg/l)	27.00	0.50	
Effluent Concentrations (mg/l)	27.00	0.45	
<b>Future Wastewater Nutrient Load</b>	<b>42.60</b>	<b>0.71</b>	
	kgN/year	kgP/year	

### Stage 2 - Calculation of Existing Nutrient Load from Surface Water

Existing Land Use	Existing Area (ha)	Nutrient Loads (kg/year)		Reference
		TN	TP	
Cereals	2.87	63.16	2.67	
Greenspace	0.56	1.68	0.01	
Lowland	1.64	15.52	1.12	
<b>Existing Surface Water Nutrient Loads</b>		<b>80.36</b>	<b>3.79</b>	
		kgN/year	kgP/year	

### Stage 3 - Calculation of Future Nutrient Load from Surface Water

Future Land Use	Proposed Area (ha)	Nutrient Loads (kg/year)		Reference
		TN	TP	
<b>Urban Land Uses</b>				
Residential Urban	1.46	19.72	2.12	
Commercial/Industrial	1.02	7.35	1.08	
Reduction factor due to SuDS		0%	0%	
Urban Nutrient Load		27.07	3.20	
<b>Non-Urban Land Uses</b>				
Greenspace	2.59	7.77	0.05	
Non-Urban Nutrient Load		7.77	0.05	
<b>Future Surface Water Nutrient Loads</b>		<b>34.84</b>	<b>3.25</b>	
		kgN/year	kgP/year	

### Stage 4 - Calculation of Nutrient Budget

Measurement	TN	TP	Explanation
Future Nutrient Load	77.44	3.96	The nutrient budget is equal to the future nutrient load minus the existing nutrient load
Existing Nutrient Load	80.36	3.79	
Nutrient Budget	-2.92	0.17	
<b>Nutrient Budget with 20% Buffer</b>	<b>-2.92</b>	<b>0.20</b>	The buffer is not applied to negative budgets
	kgN/year	kgP/year	

**Nutrient Neutrality Calculations  
Mitigated**



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<i>Reference</i> <b>22125-NUT-CA-01</b>	<i>Revision</i> <b>P02</b>	<i>Sheet</i> <b>2</b>
<i>Client</i>	Jarvis Homes and Pentland Homes	
<i>Project</i>	Kings North Medical Centre	
<i>Author</i>	Gareth Snyman	
<i>Checker</i>	NA	
<i>Date</i>	29/04/2026	

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<b>Non-Urban Land Uses</b>				
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	kgN/year	kgP/year	