New Forest National Park Authority Local Plan - Nutrient Budget (July 2026)

Introduction

1. This report discusses the New Forest National Park Authority's (NFNPA) Local Plan nutrient budget which can be found in Appendix 1. The report then goes onto discuss the wider nutrient market and whether there is sufficient supply in each of the nutrient catchments to meet the Local Plan need.

Background

2. High levels of nitrogen and phosphorous are liable to cause dense mats of macroalgae and phytoplankton to grow (called eutrophication), which can have an adverse impact upon the integrity of the protected Solent Special Protection Areas (as shown in Figure 1), as well as harming rare and protected species, such as waders. The Hampshire Avon – to the west of the National Park – is also a phosphate-affected catchment.

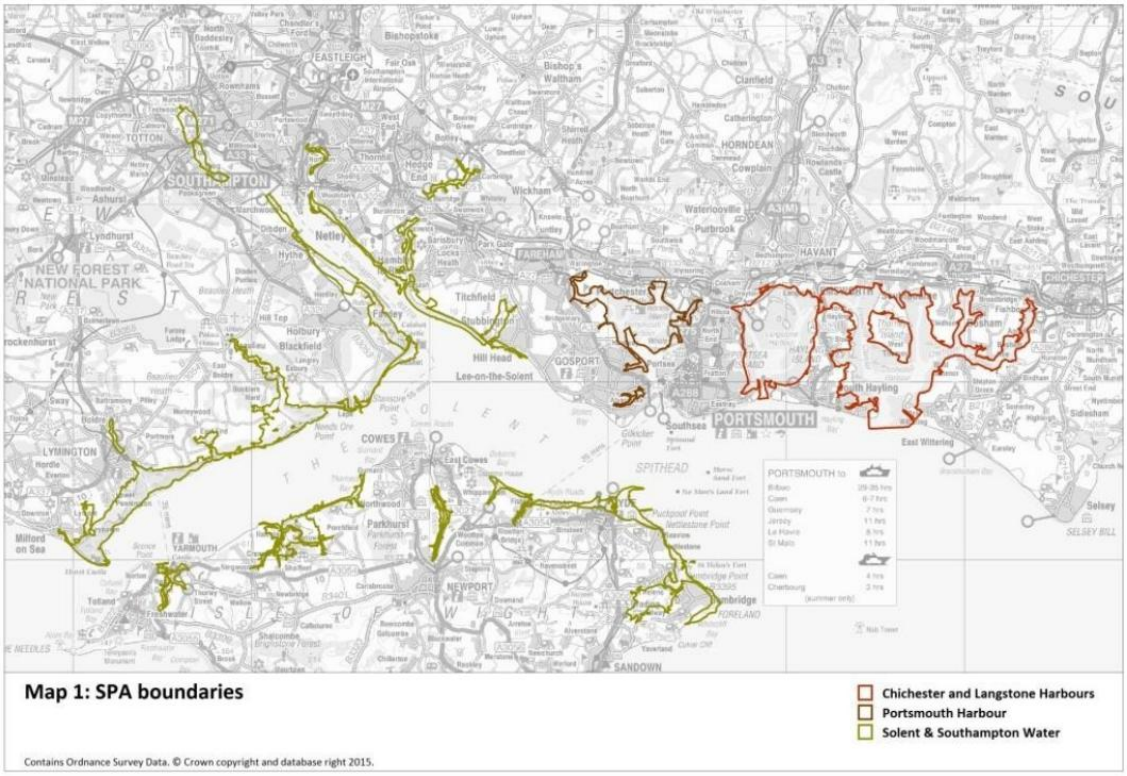


Figure 1 - The Solent SPAs (Source: SRMP Strategy)

3. In line with the Habitat Regulations and recent CJEU case law which require plans and projects to prevent further deterioration of the water environment, since January 2019 Natural England has required all developments in the Solent area to be 'nutrient neutral' for Total Nitrogen (TN). Similarly

development within the Hampshire Avon catchment is required to demonstrate phosphate neutrality. This includes all residential proposals, tourist accommodation and visitor attractions which would draw additional people into the catchment. Certain commercial and industrial activities which use large volumes of water may also be required to be nutrient neutral.

4. In March 2022 Natural England issued formal nutrient neutrality guidance for the River Itchen catchment, updated to include mandatory Total Phosphorus (TP) mitigation along with the already existing requirement to mitigate TN in the catchment. The River Itchen is designated as a Special Area of Conservation (SAC), and it was found that the river was now also experiencing excessive nutrient inputs from phosphorus, in particular. The New Forest National Park is not within the Itchen catchment area and therefore, the proposed Local Plan allocations will only require TN mitigation. It is note that the area of the National Park within the catchment of the phosphate-affected Hampshire Avon does not include any of the proposed 'defined villages' or housing site allocations.

5. To achieve nutrient neutrality, many developments will be required to secure appropriate mitigation. To satisfy the provisions of the Habitat Regulations, any required nutrient mitigation must have a high degree of certainty both in terms of its effectiveness and deliverability, and be secured prior to any impacts being created (prior to occupation).

Methodology

6. As outlined above, the main nutrient-affected catchment relevant to the New Forest National Park Local Plan Review is the Solent. The area of the National Park within the phosphate-affected Hampshire Avon catchment is not the focus of any proposed development and the National Park Authority has a legal agreement in place that enables the limited windfall development that may come forward in the area of the National Park within the Hampshire Avon catchment to access available phosphate credits.

7. The catchment data used in this report is therefore based on the latest iteration of the Solent Nutrient Supply and Demand paper from December 2025[1]. The report compares the NFNPA nutrient need against the catchment demand and supply position to determine whether there is sufficient supply to meet the NFNPA Local Plan anticipated demand.

8. The nutrient demand calculation looks at allocations proposed in the new Local Plan, and estimated windfall that is predicated to come forward. This gives an

[1] (Public Pack)Agenda Document for Partnership for South Hampshire (PfSH) Joint Committee, 09/12/2025 18:00

overall picture of the potential nutrient demand related to housing development for the relevant catchments. These calculations use the same methodology as that used in the Solent Nutrient Supply and Demand report. This involves using the Natural England Nutrient budget calculator[2] to calculate both the wastewater and land use change budgets for each proposed allocation. These two elements then form the full nutrient budget for the allocation. The draft housing figures from the allocations are used to calculate a strategic nutrient demand figure which is based on the receiving wastewater treatment works (WwTW) permit level for developments. The assessment of the wastewater nutrient demand includes the proposed technically achievable limits (TAL) due to take effect in 2030, for WwTWs that meet the threshold for being upgraded but do not currently meet the standard. If an allocation is not connected to a main sewer, then it is assumed that the allocation will drain to a Package Treatment Plant (PtP). The mg/l permit values used for the PtP are based on the Natural England default values assumed in the calculator. For the land use change element of the nutrient budget, the red line boundary for the allocations has been used, along with the Crop Map of England (CROME) 2023 data and satellite images.

9. The windfall nutrient load calculations, assume there is zero net land use change and therefore, consist of a wastewater nutrient load only. This is because there are no specific site boundaries available when calculating windfall as these developments are not yet know to the National Park Authority (NPA), or the red line boundary is not yet determined. For the wastewater element, a precautionary approach has been taken, and it is assumed that all windfall in the plan will drain to a PtP using the Natural England default values. The only time this is not the case, is if an estimated windfall allocation area is known, then the applicable WwTW will be used.

10. There are two individual nutrient sub-catchments within the Solent Nutrient Neutrality catchment that impact the NFNPA. These are, (i) New Forest Rivers; and (ii) the Test and Itchen (T&I). The catchments require TN mitigation only. The Test and Itchen for TN is treated as one catchment due to the spatial principles that apply. Development in the Test and Itchen can, therefore, obtain mitigation draining to either the River Test or River Itchen. This means that the following catchment analysis will be presented in this report:

    a. New Forest Rivers (TN)
    b. Test and Itchen (TN)

[2] Natural England nutrient calculator and guidance - Partnership for South Hampshire

11. There are several proposed allocations that are located within the New Forest Rivers sub-catchment but are within the Bartley Water water body. The Natural England guidance[3] on spatial principles states that 'due to the close proximity of the outfalls within Southampton and the tidal flows between these estuaries it is appropriate for development within the Bartley Water catchment to be included with the Test and Itchen catchment'. The main WwTW the principal impacts is Slowhill Copse Marchwood WwTW.

12. The following allocations (Land at Ashurst Hospital, Land at Knellers Lane Ashurst, and Land to west of Winsor Road, Winsor) all drain to Marchwood WwTW and are therefore impacted by the above principle. The windfall site with extant consent (Land east of New Inn Road) also drains to Marchwood WwTW. These developments will most likely obtain mitigation located within the Test and Itchen, therefore for the purposes of this report are included in the T & I catchment analysis.

13. The report analyses the 5-year projected supply and demand position for each catchment and compares the draft Local Plan need with the expected credit availability figure. It then goes onto set out the mitigation need for the part of the plan that spans beyond 5 years. There is a separate section of the report that discusses the supply position of the catchments beyond 5 years.

14. The draft Plan's windfall calculations are presented at the end of the report using the same catchment approach.

15. This nutrient budget has been put together in order to demonstrate that sufficient mitigation is likely to be available to satisfy the quantum of development within the emerging NFNPA Local Plan. Appendix 1 of this report shows the expected nutrient demand over the plan period.

[3] Natural-England's-latest-guidance-on-achieving-nutrient-neutrality-for-new-housing-development-June-2020.pdf

Local Plan Allocations

New Forest Rivers

16. There are two proposed Local Plan allocations within the New Forest Rivers catchment. Only the allocation 'Land at Calpe Avenue, Lyndhurst' is expected to come forward in the next 5 years.

(0 – 5 Years)

17. As shown in Appendix 1, the allocation 'Land at Calpe Avenue, Lyndhurst' has a nutrient need of approximately 131.5 Kg/TN/Yr. The NFNPA has legal agreements in place with three existing mitigation schemes that this development can obtain suitable mitigation from in the catchment. Two of the schemes still have a significant amount of supply available on the market.

(5+ Years)

18. The other allocation located in the New Forest Rivers catchment is 'Land to west of Brighton Road, Sway'. The allocation is anticipated to come forward beyond 5 years and has an estimated nutrient load of 29.2 Kg/TN/Yr. This need can be met from the existing levels of supply on the market.

Test and Itchen (Total Nitrogen)

19. Figure 2 is an extract from the recent Solent Nutrient S&D report[1] considering the supply and demand for nutrient credits within the Test and Itchen catchment. The figure shows the expected level of TN mitigation expected to be available in the Test and Itchen Catchment over the next 5 years.

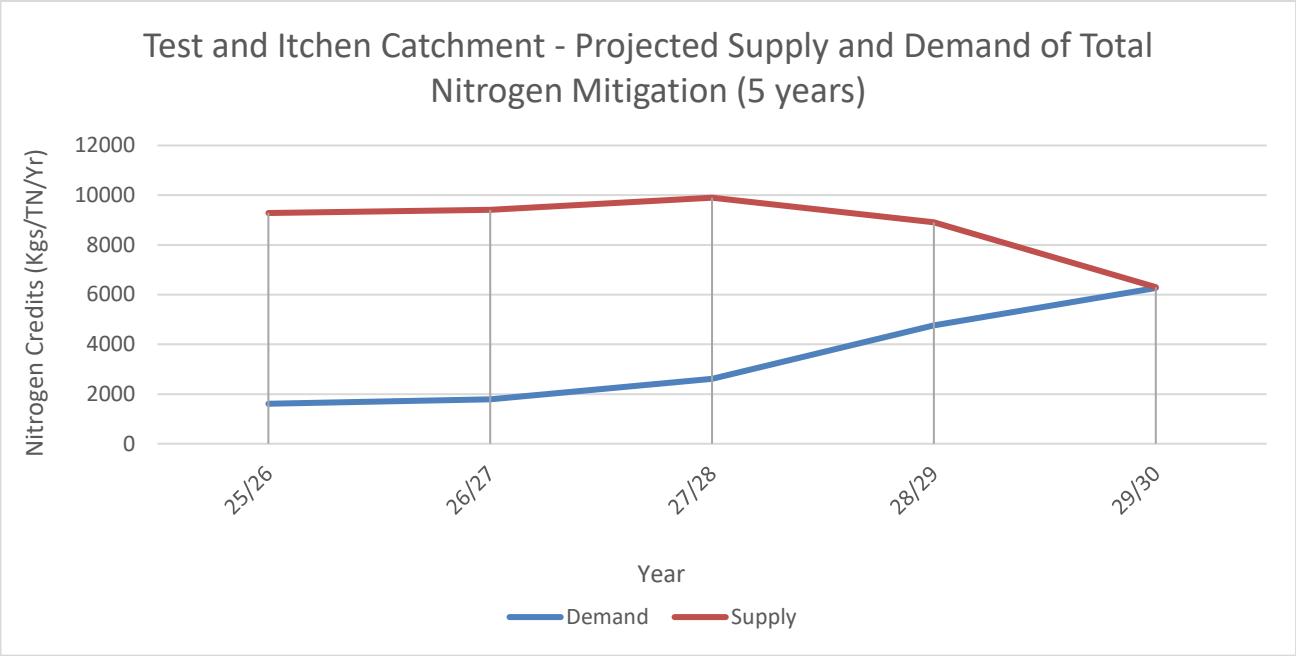


Figure 2 – Projected supply and demand of nutrient mitigation in the Test and Itchen Catchment over next 5 years (Source: PfSH December 2025 Joint Committee)

(0 – 5 Years)

20. As shown in Appendix 1, the estimated phasing of allocation units between 0-5 years would generate a nutrient need of approximately 17 Kg/TN/Yr. This is comfortably within the range of estimated supply of nutrient credits within the Test and Itchen Catchment shown in figure 2. The NFNPA has a legal agreement in place with one existing mitigation scheme, as well as being a signatory to an Inter Authority Agreement which gives it access to all schemes delivered in the catchment by the Solent Mitigation Partnership (SMP). Both mitigation providers have a significant amount of supply available to satisfy the anticipated demand.

(5+ Years)

21. Five of the six allocations located within the Test and Itchen catchment are anticipated to come forward beyond five years. Of the five, the allocation 'Land to south of Hamptworth Road, Landford' has a nutrient load of zero. This is because the land use change from its existing predominant land use of cereals outweighs the additional wastewater load that will be present from new dwellings.

22. Therefore, when looking at the period beyond 5 years, only four allocations have a nutrient demand and appendix 1 estimates that 369 Kg/TN/Yr will be

required to satisfy the Test and Itchen catchment demand within the National Park.

Local Plan Allocations - Long Term Nutrient Mitigation Need (5+ Years)

23. Appendix 1 estimates that in total across all the nutrient affected allocations an additional 369 Kg/TN/Yr and 29 Kg/TN/Yr will be required in the Local Plan period beyond 5 years across the Test and Itchen, and New Forest River catchments, respectively. Based on the Solent Nutrient S&D report from December 2025 only the New Forest Rivers catchment has enough supply to meet this need. For the Test and Itchen catchment, while nutrient mitigation has not yet been identified to satisfy these years, the current rate of mitigation schemes coming online is expected to continue and be able to meet future demand. This is informed by the investment strategy of organisations such as the Solent Mitigation Partnership who received funding from MHCLG to create large-scale nutrient mitigation sites to enable housing delivery. Beyond the next 5 to 10 years, it is likely that mitigation will be supplemented by enhancements to regional WwTW which have a 5+ year investment cycle. For example, WwTW serving over 2000 population will be upgraded to TAL by 2030. This was mandated through the Levelling Up and Regeneration Act (LURA) 2023 and will result in a reduction in the overall demand for nutrient mitigation in the catchments. Alongside this, it is expected that other strategic solutions will also come forward such as Environmental Delivery Plans (EDPS). These are being developed by Natural England and are expected to come forward in the medium term as another form of nutrient mitigation that developers can utilise. However, when exactly EDPs will come forward and whether they will provide suitable mitigation for the allocations is currently unknown.

Windfall

New Forest Rivers

24. Appendix 1 estimates the windfall nutrient demand for the New Forest Rivers catchment to be 81.8 Kg/TN/Yr in the first 5 years and 163.6 Kg/TN/Yr beyond 5 years.

Test and Itchen

25. Appendix 1 estimates the windfall nutrient demand for the Test and Itchen catchment to be 219.3 Kg/TN/Yr in the first 5 years, this includes the two windfall allocations, and then 227.2 Kg/TN/Yr beyond 5 years.

Windfall Summary

26. The windfall figures presented above are extremely precautionary as it is expected that a windfall development would likely have negative land use change and a lower wastewater permit due to a bespoke PtP or by connecting to a mains sewer. These factors would likely result in a lower nutrient load being required.

Conclusion

27. Based on the above, we can conclude that sufficient nutrient mitigation credits will be available to satisfy the development needs of the NFNPA across all of the Local Plan allocations. The Local Plan, therefore, meets the provisions of the Habitat Regulations.