



Nutrient Neutrality Assessment and Mitigation Strategy

Premier Inn, Salisbury North, Bishopdown

February 2026

Prepared for:
Whitbread PLC

Prepared by:
Stantec UK Limited

Project Number:
332613105

Registered Office: Stantec House, Kelburn Court,
Birchwood, Warrington, WA3 6UT

Office Address: Lakeside House, Blackbrook Business
Park, Blackbrook Park Avenue, TA1 2PX
T: 01823 218940 E: Taunton.uk@stantec.com

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Prepared by: _____
Signature
Eleanor Jones

Printed Name

Reviewed by: _____
Signature
Kirstie Thistlethwaite

Printed Name

Approved by: _____
Signature
Gemma Nelmes

Printed Name

Revision Schedule

Revision	Description	Author	Date	Quality Check	Date	Independent Review	Date
A	Update to Appendix D	RR	09/02/26	GN	09/02/26	AJ	09/02/26
B	Update to Appendix E	EJ	17/02/26	RR	17/02/26	AJ	17/02/26
C	For planning	EJ	26/02/26	KT	26/02/26	GN	26/02/26



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Executive Summary

This section presents a non-technical summary of the outcomes of the Nutrient Neutrality Assessment and Mitigation Strategy (NNAMS). The assessment has been undertaken to support a planning application for an extension of 12 new hotel rooms at Premier Inn, Salisbury North Bishopdown.

The site lies within the River Avon catchment, which is subject to advice issued by Natural England that all development should be nutrient neutral. This means that development should not increase the loadings of phosphorus (otherwise referred to as 'nutrients') entering the hydrological catchment.

The development proposals will not result in a change in land use and therefore the surface water nutrient loading has been discounted. The foul produced by the development is assumed to convey to the Salisbury WwTW which has a current permit level of 1mg/litre for phosphorus. In accordance with the Levelling Up and Regeneration Act (LURA) it is assumed the permit level at Salisbury WwTW will be upgraded to the highest Technologically Achievable Limit (TAL) of 0.25mg/l by 2030.

The nutrient budget for the proposed development has been calculated using the Natural England Nutrient Neutrality Budget Calculator for River Avon SAC. The nutrient budget has been assessed on the proposals for a 12-room hotel extension and is based on data for the existing hotel rooms provided by the client alongside publicly available data.

The assessment concludes there is a need for nutrient mitigation to make the development nutrient neutral. Mitigation for the proposed development will be provided through retrofitting water efficiency measures within the existing hotel rooms at Salisbury North Bishopdown Premier Inn.



1 Introduction

1.1 Scope of the Report

- 1.1.1 This Nutrient Neutrality Assessment (NNAMS) has been prepared by Stantec on behalf of our Client, Whitbread PLC, to support a planning application for an extension of Salisbury North Bishopdown Premier Inn.
- 1.1.2 The purpose of this NNAMS is to undertake a desk-based assessment of the development proposals to calculate a nutrient budget. Based on this nutrient budget, a mitigation strategy will be developed which will address the site-specific approach that must be taken to offset the nutrient budget.
- 1.1.3 All work has been undertaken following the advice provided by Natural England (NE) in a letter titled 'Advice for development proposals with the potential to affect water quality resulting in adverse nutrient impact on habitats sites' for the River Avon Special Area of Conservation (SAC). This assessment will make use of the River Avon SAC Nutrient Budget Calculator provided by NE.
- 1.1.4 The information given within this report is based on publicly available data alongside data on the existing hotel provided by the client. Consultation with Natural England was undertaken through a meeting on the 1st October 2025 and a letter dated 25th February 2026 to discuss the proposals and the approach taken to the nutrient neutrality assessment. The calculations presented in this assessment reflect the revised methodology as agreed with NE. A copy of the meeting minutes and the DAS letter is provided in **Appendix E**.

1.2 Sources of Information

- 1.2.1 The NNAMS has been prepared based on the following sources of information:
- 'Advice for development proposals with the potential to affect water quality resulting in adverse nutrient impact on habitats sites' prepared by Natural England 16th March 2022.
 - River Basin Management Plan '*South-West River Basin District*' prepared by DEFRA and EA, dated 2015;
 - The Natural England River Avon SAC Nutrient Neutrality Calculator produced by Ricardo Energy and Environment
 - Nutrient Neutrality Catchments (England) produced by Natural England and Environment Agency
 - Defra Magic Map website ^[1];
 - British Geological Survey, UK Soil Map.²
 - UK Centre for Ecology & Hydrology, National River Flow Archive³.
 - Cranfield Soil and Agrifood Institute, Soilscales.⁴
 - Environment Agency, Catchment Data Explorer⁵.

¹ <https://magic.defra.gov.uk/MagicMap.aspx>

² [UK Soil Observatory \(bgs.ac.uk\)](http://uksoil.ac.uk)

³ [Catchment Info for 43026 - Bourne at Salisbury Bourne \(ceh.ac.uk\)](http://catchmentinfo.ceh.ac.uk)

⁴ [Soilscales soil types viewer - National Soil Resources Institute. Cranfield University \(landis.org.uk\)](http://soilscales.landis.org.uk)

⁵ [England | Catchment Data Explorer](http://environment-agency.gov.uk/catchment-data-explorer)



2 Background

2.1 Nutrient Neutrality

- 2.1.1 Following the Dutch Nitrogen Case ('Dutch-N') which ruled that, where an internationally important site (i.e. SACs, SPAs and Ramsar Sites) is failing to achieve condition due to pollution, the potential for a new development to add to the nutrient load is "necessarily limited". The Dutch-N case has informed the way in which regulation 63 of the Habitats Regulation 2017 should apply to pollution related incidents.
- 2.1.2 In March 2022, NE issued a letter 'Advice for development proposals with the potential to affect water quality resulting in adverse nutrient impacts on habitats sites' to the affected Local Planning Authorities. The letter outlined that there is evidence showing high levels of nutrient input to the environment causing eutrophication at specific sites with environmental designations. These nutrient inputs are often currently caused by wastewater from existing housing and agricultural sources, and there is uncertainty as to whether new growth will further deteriorate designated sites.
- 2.1.3 For each of the affected areas presented in the NE letter, catchment specific guidance and calculators were released which included background on the designated sites affected. The River Avon SAC is considered unfavourable, or at risk, from the effects of eutrophication caused by excessive phosphates. As such, any increase in phosphorus and nitrogen supply caused by development within the catchment of River Avon SAC be offset.
- 2.1.4 NE guidance outlines that there is evidence showing high levels of nutrient input to the environment causing eutrophication at specific sites with environmental designations. These nutrient inputs are currently caused by wastewater from existing housing and agricultural sources, and there is uncertainty as to whether new growth will further deteriorate designated sites.
- 2.1.5 One way to address this uncertainty is for new developments to achieve nutrient neutrality. Nutrient neutrality is a means of ensuring that that development does not add to existing nutrient burdens and aims to provide certainty that the whole scheme is deliverable in line with the requirements of the Conservation of Habitats and Species Regulation 2017 (as amended).
- 2.1.6 NE have set out the planning and environmental context for nutrient neutral approach as well as a practical methodology to calculating how nutrient neutrality can be achieved. Natural England states that "the achievement of nutrient neutrality, if scientifically and practically effective, is a means of ensuring that development does not add to existing nutrient burdens".
- 2.1.7 Therefore, in line with national planning policy, the advice is that the competent authority should consider the implications of these matters on the Ramsar Site by undertaking a Habitats Regulation Assessment (HRA), proceeding to an appropriate assessment. The appropriate assessment must rule out any reasonable doubt as to the likelihood of an adverse impact on the integrity of the site, having regard to its conservation objectives.
- 2.1.8 In relation to mitigation, the letter explains that it should be in place so as to avoid either permanent, or temporary increases in phosphate loads to the designated site and must be effective for the duration of the effect. In the case of new development with overnight stays the duration of the effect is typically taken as in perpetuity, with the costs of maintaining, monitoring and enforcing mitigation calculated for a minimum of 80 – 125 years.



2.2 Water Quality

- 2.2.1 The Water Framework Directive (WFD) (Commission of the European Communities, 2000) (ref 13.2) establishes a framework for a European-wide approach to action in the field of water policy. Its ultimate aim is to ensure all inland and near shore watercourses and water bodies (including groundwater) are of 'Good' status or better, in terms of ecology, and also chemical, biological and physical parameters, by the year 2027. Therefore, any activities or developments that could cause detriment to a nearby water resource or prevent the future ability of a water resource to reach its potential status, must be mitigated so as to reduce the potential for harm and allow the aims of the Directive to be realised.
- 2.2.2 The Environment Agency (EA) Catchment Data Explorer website has water quality data available for watercourses. This includes background data on the catchment, the existing standards of water quality and expected standards of water quality the watercourse is expected to achieve by set dates which are reviewed on a seven-year cycle. Also included are any national or local protected areas.
- 2.2.3 The Environment Agency Catchment Data Explorer website has water quality data relating to the WFD targets for 2027. Based on the most recent water quality data recorded in 2019, the Hampshire Avon Management catchment data indicates 71% of water bodies have not achieved good ecological status and 100% have not achieved good chemical status. Evidence indicates that of the classification elements for not achieving good is total phosphorus.

Types of Phosphorus

- 2.2.4 The forms of phosphorus need to be recognized when calculating nutrient budgets. The key measure for still and very slow flowing waters such as lakes or ditches is total phosphorus (TP) because this is available for algae and plant growth. For rivers, the designated sites standards are for Soluble Reactive Phosphorus (SRP) as both an annual and a growing season mean. The relationship between SRP and TP is not straight forward and can vary between, and even within catchments. Modern WwTW permits usually have values for total phosphorus and the Environment Agency guidance on technically achievable limit (TAL) is for total phosphorus.

Designation Current Condition

- 2.2.5 The Hampshire Avon River system supports habitats and species of national and international importance, with Sites of Special Scientific Interest (SSSI), Special Area of Conservation (SAC) and Special Protection Area (SPA) designations. The total catchment area is approximately 1,750 km² with 205 km of river designated as SSSI.
- 2.2.6 The River Avon is listed as a Special Area of Conservation (SAC) under the Conservation of Habitats and Species 2017 (the Habitats Regulations). The River Avon its tributaries are chalk rivers flowing through narrow chalk valleys that converge at Salisbury. The River Avon supports over 180 species of plants. The diverse aquatic plant communities support an extremely rich invertebrate life such as mayfly and snails that in turn support aquatic species such as Atlantic salmon and bullhead. Adjacent and linked wetland on the floodplain comprises wet swamp and fen, providing habitat for the Desmoulin's whorl snail.
- 2.2.7 Some of the designated sites have high levels of nitrogen and phosphorus input to the protected water environment with sound evidence that these nutrients are causing eutrophication at these designated sites. These nutrient inputs currently mostly come either from agricultural sources or from wastewater from existing housing and other development.



2.3 Levelling Up and Regeneration Act (2023)

- 2.3.1 The Levelling Up and Regeneration Act (LURA) places a legal obligation on water and sewerage providers to upgrade Wastewater Treatment Works (WwTW), also referred to as WRC, to the "highest Technologically Achievable Limit (TAL)" by 2030 (serving a population equivalent of greater than 2000), which is enforceable via the provisions of Section 18 of the Water Industry Act, 1991.
- 2.3.2 The government released a list of nutrient significant plants which are required to be upgraded in accordance with the LURA, the list indicates the phosphorus permits for Salisbury WwTW are to be upgraded to 0.25 mgTP/l by 2030.



3 Proposed Development Site

3.1 Site Description

- 3.1.1 The proposed development site (hereafter referred to as '*the site*') is located at Premier Inn, Salisbury North, Bishopdown. The site is located off Pearce Way. (see **Figure 3-1**) (see **Appendix A**).

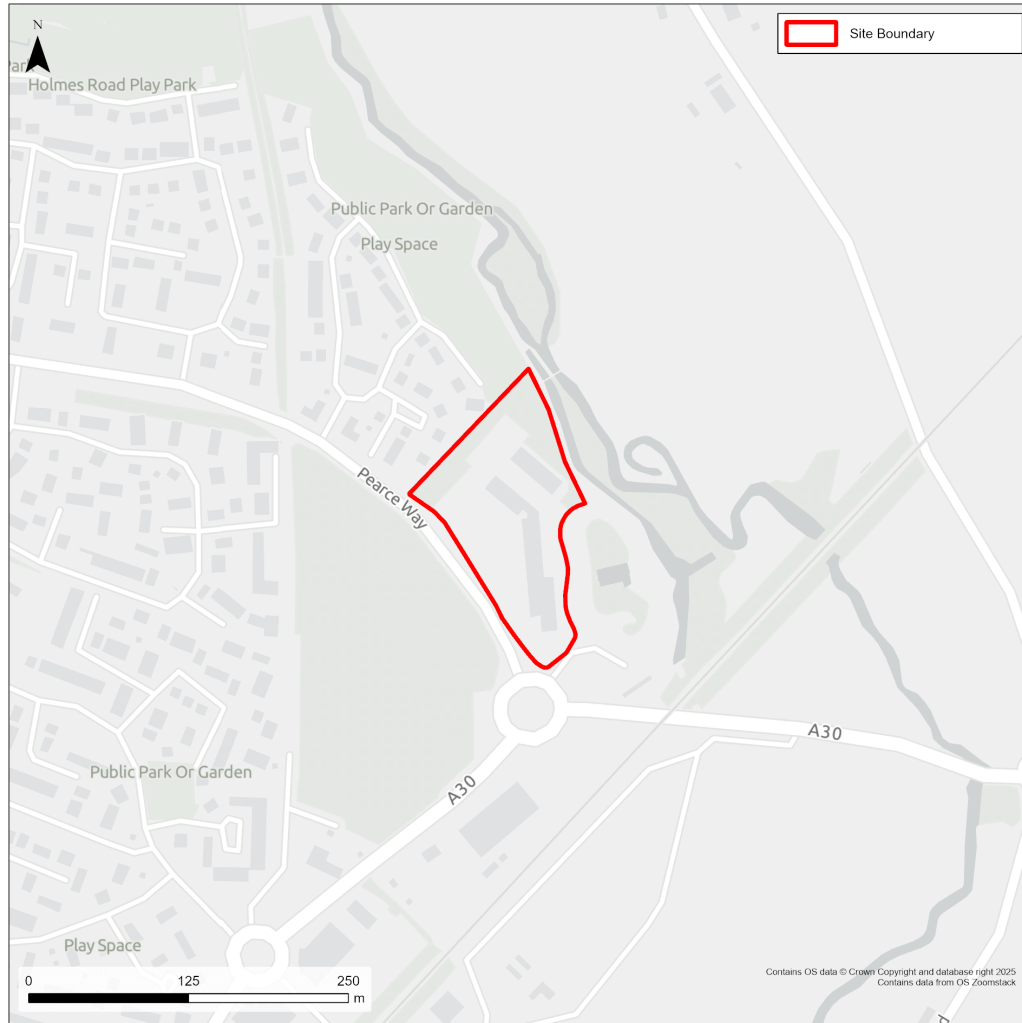


Figure 3-1: Site Location

- 3.1.2 The site is centred around the Ordnance Survey (OS) grid reference 416116m E, 132247m N.

3.2 Hydrological Setting and the Water Framework Directive

- 3.2.1 The nearest watercourse to the site is the River Bourne, located approximately 170m northeast of the site. The River Bourne discharges into the River Avon approximately 3.4km downstream of the site.

Water Framework Directive

- 3.2.1 The site falls within the Bourne (Hampshire Avon) Water Body (part of the Avon Hampshire Operational Catchment). The Environment Agency (EA) Catchment Data Explorer website has water quality data relating to the WFD targets for 2027. Based on the most recent water quality data recorded in 2022, the Bourne (Hampshire Avon) Water Body received a 'Good' ecological classification and a 'Fail' for chemical water quality recorded in 2019.
- 3.2.2 Data shows the reasons for the Bourne (Hampshire Avon) Water Body not achieving 'Good' status. These include, but aren't limited to;
- Physical modification from urbanisation and barriers providing ecological discontinuity
 - Changes in flow from groundwater abstraction

3.3 Development Proposals

- 3.3.1 This report will review the nutrient management for a proposed development of a 12-room extension at Premier Inn, Salisbury North, Bishopdown.
- 3.3.2 Foul water from the proposed development is assumed to be treated by the nearest Wastewater Treatment Works (WwTW), which has been identified as Salisbury WwTW.
- 3.3.3 A masterplan is provided in **Appendix B**.



4 Nutrients Budget Assessment

4.1 Methodology

- 4.1.1 The Nutrient Budget Assessment has been undertaken by applying the Natural England Nutrient Neutrality Budget Calculator for River Avon SAC. A copy of the calculation is provided in **Appendix C**.
- 4.1.2 The assessment has been carried out using water usage and occupancy data provided by the client
- 4.1.3 The extension is proposed in the location of the existing car parking spaces for the hotel, as such the site's pre-development and post-development land use are both considered Commercial/Industrial. Therefore, there will be no net change in nutrient load resulting from the Stages 2 & 3 Nutrient Budget and as such these stages have not been considered any further in this assessment. See **Appendix B** for the existing and proposed site layouts.

4.2 Stage 1 – Wastewater

- 4.2.1 The aim of Stage 1 is to calculate TP in kilograms per annum derived from the development that would exit the WwTW after treatment. This only applies to WwTW that discharge to the River Avon SAC.

Water Usage

- 4.2.2 Water meter data from the existing Salisbury North Bishopdown Premier Inn hotel includes meterage from the onsite public restaurant and therefore the data is not considered representative of the average water usage for overnight guests of the hotel. Therefore, the water usage for the proposed development has been calculated based on the water meter data from existing nearby Premier Inn hotels: Southampton West, Southampton North, Southampton Airport for the period 2015-2024.
- 4.2.3 The average water usage per guest is:
 - Southampton West: 84 l/p/d
 - Southampton North: 127 l/p/d
 - Southampton Airport: 128 l/p/d
- 4.2.4 As a conservative approach, the maximum water usage of 128 l/p/d has been adopted. As outlined in **Appendix D**, water efficiency measures are to be implemented within the hotels, which result in a 28l reduction in the water usage per guest. These measures will be placed as part of the development proposals for this site. As such, the average post-implementation water usage has been used, and 10l buffer has been included in accordance NE guidance. Therefore, adopted water usage is 110 l/p/d.

Permit

- 4.2.5 The wastewater will be conveyed to Salisbury Wastewater Treatment Works (WwTW), which is known to have the following permits
 - Present day 1 mg TP/l
 - Post 2030 0.25 mg TP/l



4.3 Occupancy

- 4.3.1 The proposed development is for 12 rooms which will be open 365.25 days/year.
- 4.3.2 The proposed percentage occupancy for the hotel is 75%, provided by the Client, and is considered to be the best available and most appropriate metric for the hotel.
- 4.3.3 The Natural England nutrient budget calculator applies a default occupancy of 2.4 persons/dwellings. However, the proposals are for a hotel, and the default occupancy is not considered representative of the proposed development scenario.
- 4.3.4 The Client calculates the average sleeper ratio—the number of guests per room as a ratio of the maximum number of occupants of the room—for its financial model, which is equivalent to the occupancy rate. The sleeper ratio for the existing hotel is 1.6.
- 4.3.5 The total population increase has been calculated as 14 guests per day. This is based on multiplying the sleep ratio/occupancy rate (1.6) by the percentage occupancy (75%) multiplied by the number of rooms (12).

Nutrient Loading from Wastewater

- 4.3.6 Based on the development proposals above, the nutrient loading after treatment at the WwTW is set out below for hotel guests (see **Table 4-1** and **Appendix D**).

Table 4-1: Foul Loading – Current and Future Permit

Permit Scenario	Phosphorus Loading (kgTP/yr)
Present Day	0.52
Post-2030	0.13

4.4 Stage 4 – Nutrient Budget

- 4.4.1 The aim of Stage 4 is to calculate the net change in the nutrient load that would result from the development.
- 4.4.2 A precautionary buffer of 20% is applied to the nutrient budget. This precautionary buffer is used to recognise the uncertainty with the data and ensures the approach is precautionary.
- 4.4.3 **Table 4-2** presents a total nutrient budget for both the existing permit and the post-2030 permit. A calculation summary is provided in **Appendix D**.

Table 4-2: Calculated Nutrient Budget

Permit Scenario	Nitrogen Loading (kgTP/yr)
Present Day	0.62
Post-2030	0.16

- 4.4.4 The results shown in **Table 4-2** demonstrate there is a nutrient surplus created by the development proposals assessed. Therefore, there will be a requirement for the development to demonstrate nutrient neutrality through the application of mitigation in order to achieve planning consent.



5 Mitigation Strategy

5.1 Overview

- 5.1.1 The proposed development site and the proposed WwTW lie within the hydrological catchment of the River Avon SAC site. As such, the nutrient budget produced by the development must be offset (including the precautionary 20% buffer).

5.2 Reduction in Existing Hotel Water Use

- 5.2.1 The Client proposes to retrofit water efficiency measures as part of a water stewardship programme for the existing hotel at Premier Inn Salisbury North, Bishopdown.
- 5.2.2 An assessment of the current nutrient load from wastewater and post-retrofitting nutrient load from wastewater for the site is provided in **Appendix D**.
- 5.2.3 A summary of outcomes is presented within **Table 5-1**.

Table 5-1: Nutrient Credits

Permit Scenario	Existing Annual wastewater TP Load (kg TP/yr)	Post-retrofitting Annual wastewater TP Load (kg TP/yr)	Net Change (kgTP/yr)
Present Day	6.22	5.37	0.85
Post-2030	1.55	1.34	0.21

- 5.2.4 **Table 5.2** demonstrates that the retrofitting water efficiency measures will provide 0.85kgTP/yr of temporary credits, of which 0.62 kgTP/yr will be used to mitigate the proposed development. The remaining 0.23 kgTP/yr of temporary credits will be retained by the client for potential use for future development.
- 5.2.5 Post-2030, 0.21 kgTP/yr of permanent credits will be available, of which 0.16 kgTP/yr will be used to mitigate the proposed development. The remaining 0.05 kgTP/yr of permanent credits will be retained by the client for potential use for future development.



6 Summary

6.1 Overview

- 6.1.1 This Nutrient Neutrality Assessment and Mitigation Strategy has been prepared to support a planning application for an extension to Salisbury North Bishopdown Premier Inn hotel. The information given within this report is based on publicly available data at the time of writing and consultation with Natural England.
- 6.1.2 The site lies in the Bourne (Hampshire Avon) Water Body, with evidence indicating, physical modification and groundwater abstraction, are major contributors to the water body not achieving 'good' status. The proposed development site and the proposed Wastewater Treatment Works lie within the hydrological catchment of the River Avon Special Area of Conservation (SAC). As such, the nutrient budget produced by the development must be offset (including the precautionary 20% buffer).
- 6.1.3 The nutrient budget has been assessed the proposals for an extension of 12-rooms at the Premier Inn hotel. The calculated nutrient budget demonstrates the requirement for nutrient mitigation to achieve nutrient neutral development.
- 6.1.4 The Nutrient Neutrality Assessment and Mitigation Strategy outlines the proposed mitigation strategy for the site which includes retrofitting water efficiency measures at within the existing rooms within the hotel.

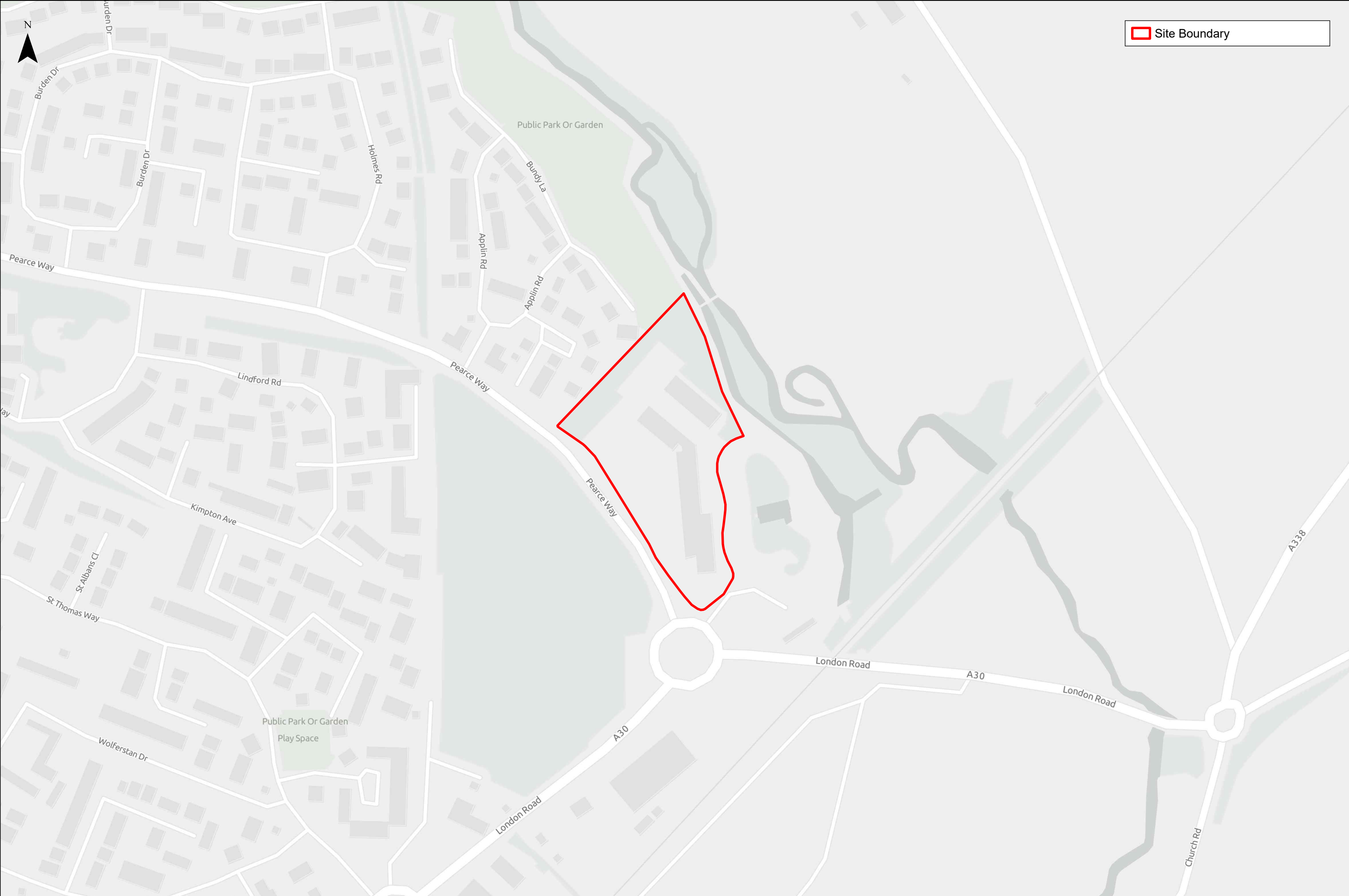


Appendix A Site Location

Site Location Plan



Project
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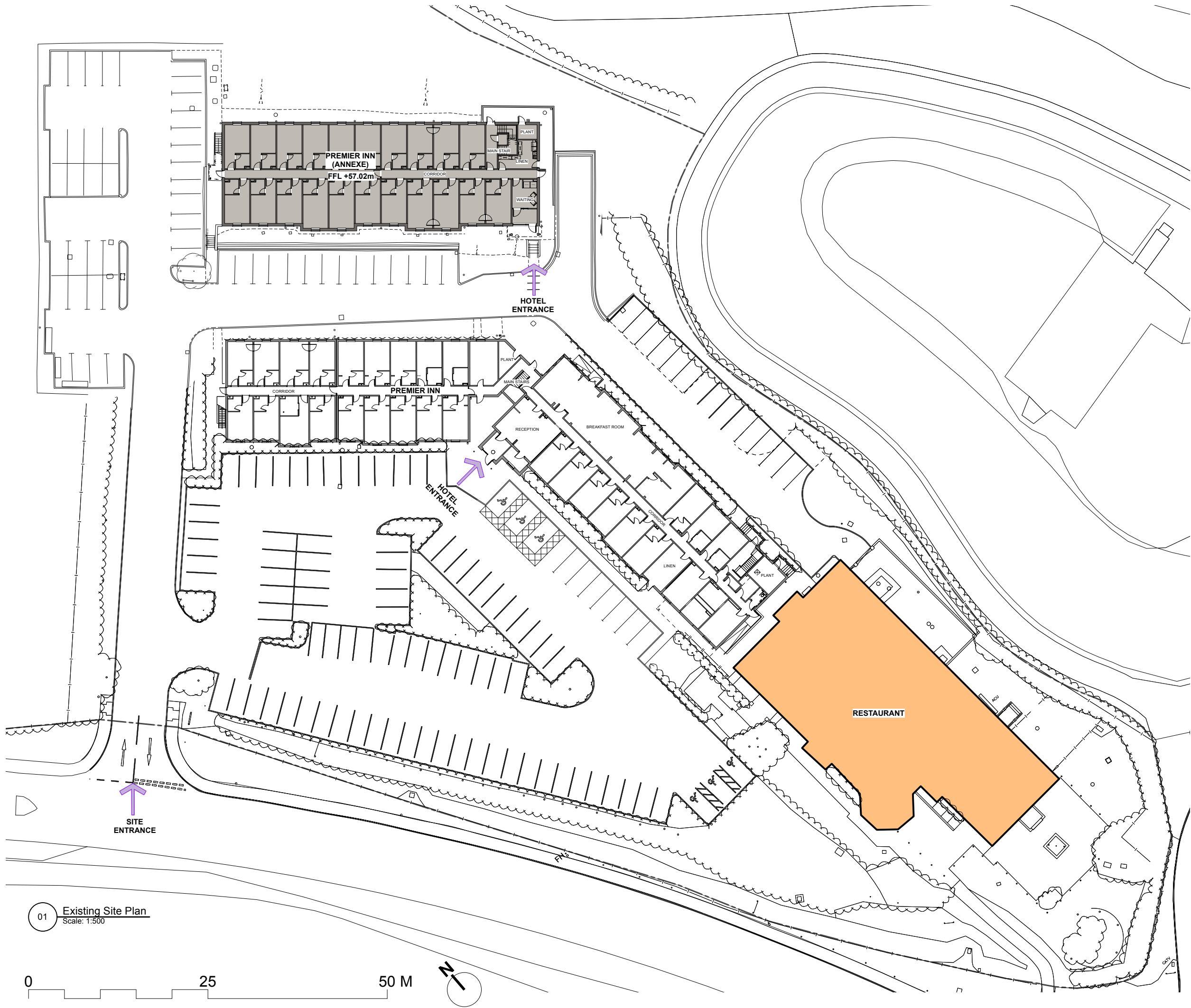
	Client Whitbread PLC	PREMIER INN, SALISBURY NORTH BISHOPSDOWN Site Location	0125250 Contains OS data © Crown Copyright and database right 2025 Contains data from OS Zoomstack	1:2,500 @ A3	Date: 03/11/2025
				Drawn: EJ	Checked: RR
				Figure: 01	Rev: A

Appendix B Development Proposals

Existing Site Layout
Proposed Site Layout



Project
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01 Existing Site Plan
Scale: 1:500

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Notes:

Existing Only	
Existing parking	164

Existing Annexe

Existing GEA	1306 sq m
Existing GIA	1216 sq m

Existing Hotel

Existing GEA:	1203 sq m
Existing GIA:	1141 sq m

Total Existing Rooms: 114

Legend:

- Title Boundary
- Existing Restaurant & BOH
- Existing Premier Inn

C	12/03/25	Minor amendments	CF
B	23/5/24	Existing room count updated	SR AB
A	2/5/24	Boundary line updated	SR AB
Rev	Date	Description	By

AXIOM ARCHITECTS

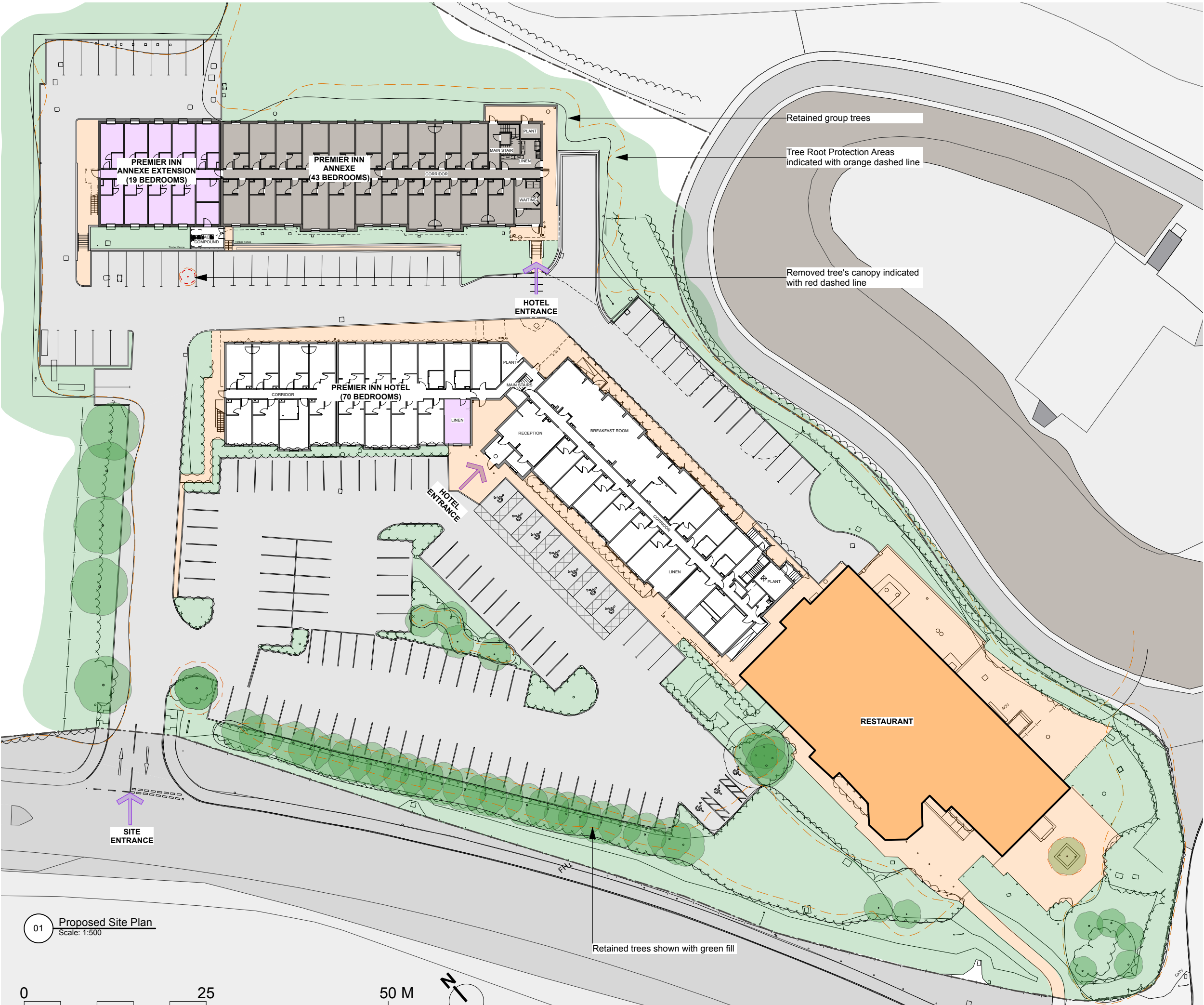
1 Brooklands Yard Southover High Street Lewes East Sussex BN7 1HU
Tel. 01273 479434 www.axiomarchitects.co.uk

Client
WHITBREAD GROUP PLC

Project
SALISBURY NORTH PREMIER INN
PEARCE WAY, SALISBURY
SP1 3GU

Drawing
Existing Site Plan

Scale	Date	Drawn	Checked
1:500	4/4/24	SR	AB
Drawing No.			Revision
6213-P-	002	C	
Status			
PLANNING			



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Notes:	
Proposed & Existing	
Parking Total:	152
Extension GEA Total:	490 sq m
Extension GIA Total:	448 sq m
Existing Rooms:	113
Proposed Rooms:	19
Total Rooms:	132
Legend:	
---	Title Boundary
	Existing Premier Inn
	Existing Restaurant & BOH
	Proposed Work / Extension

F	12/03/25	Minor amendments	CF
E	18/6/24	UA Parking spaces added	SR AB
D	23/5/24	Existing room count updated	SR AB
Rev	Date	Description	By



AXIOM

ARCHITECTS

1 Brooklands Yard Southover High Street Lewes East Sussex BN7 1HU
Tel. 01273 479434 www.axiomarchitects.co.uk

Client
WHITBREAD GROUP PLC
Project
SALISBURY NORTH PREMIER INN PEARCE WAY, SALISBURY SP1 3GU
Drawing
Proposed Site Plan

Scale	Date	Drawn	Checked
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6213-P- 010			F
Status			
PLANNING			

Appendix C Nutrient Budget Calculations



Project
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Nutrients from wastewater

This sheet contains 2 tables. The tables are separated by a heading, which describes the following table.

Note: You will need to fill in cells B5 to B9 in the first table 'Water infrastructure information'. Cells B10 is automatically calculated and will state '0.00' unless the user inputs have been entered. Cells A11 to A12 and B11 to B12 are automatically generated and will state 'Not applicable' depending on the inputs to cells B5 and B9. You may need to fill in cell C10 depending on the information you entered in cell B9. Cells C5 to C9 and cells C11 to C12 are intentionally blank cells.

You do not need to fill in any cells in the second table 'Final calculation of nutrient load from wastewater'. Cells B16 to B18 are automatically calculated and will state '0.00' unless the user inputs have been entered to the first table 'Water infrastructure information'. Cells A19 to A22, cells B20 and B22 are automatically generated and will state 'Not applicable' depending on the user inputs to the first table 'Water infrastructure information'. Cell B15, cell B19 and cell B21 are intentionally blank cells.

How to fill in the table 'Water infrastructure information'

Cell B5: Enter the date of first occupancy.

Cell B6: Enter the average occupancy rate of the development. The default rate is 2.4, this should not be edited without sufficient evidence.

Cell B7: Enter the water usage. This value should be kept at 120 unless other efficiency measures are used.

Cell B8: Enter the total number of dwellings or units that will be within the development site as of the project completion date.

Cell B9: Choose the receiving wastewater treatment works (WwTW) from the dropdown list.

If you select 'Package Treatment Plant user defined' or 'Septic Tank user defined', you must enter their certified value of total phosphorus (TP) in cell C10. Otherwise the default values will be used in the calculation of the nutrient load associated with wastewater.

Nutrient permits may be changing for the WwTW you select, from 01/01/2025, or 01/04/2030. If the date of first occupancy is in-between changing permit dates, multiple permit limits may be automatically generated in cells B10 to B12. If applicable, up to 3 values for the nutrient loading associated with wastewater will be presented in cell B18, B20 or B22.

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):		
Average occupancy rate (people/dwelling or people/unit):	1.20	
Water usage (litres/person/day):	110	
Development proposal (dwellings/units):	12	
Wastewater treatment works:	Salisbury (Petersfinger)	
Current wastewater treatment works P permit (mg TP/litre):	1.00	
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):	14.40
Wastewater by development (litres/day):	1584.00
Annual wastewater TP load (kg TP/yr):	0.13
Pre-2030 wastewater nutrient loading	
Annual wastewater TP load (kg TP/yr):	0.52
Not applicable	
Not applicable	Not applicable

Final nutrient budgets

This worksheet contains one table. This table is automatically populated using the outputs from the previous worksheets.

Note: You do not need to fill in any cells in the table.

Cells B5 to B8 and cells B10 are automatically calculated and will state '0.00' unless the user inputs have been entered to all of the required worksheets.

Cells A11 to A14, cell B12 and cell B14 are automatically generated and will state 'Not applicable' depending on the user inputs to the worksheet 'Nutrients_from_wastewater'.

Cell B9, B11 and B13 are intentionally blank.

This table presents calculations that underpin the final annual nutrient budget for the development site. Up to 3 values for the nutrient budget may be presented in cells B10, B12 and B24 for total phosphorus (TP).

Total nutrient budget calculations

Description of values generated	Values generated
Wastewater TP load (kg TP/year):	0.13
Net land use TP change (kg TP/year):	0.00
TP budget:	0.13
TP budget + 20% buffer:	0.16
Annual nutrient budget	
The total annual phosphorus load to mitigate is (kg TP/yr):	0.16
Pre-2030 nutrient budget	
The total annual phosphorus load to mitigate is (kg TP/yr):	0.62
Not applicable	
Not applicable	Not applicable

Appendix D Mitigation Strategy



Project
Number:
332613105

TECHNICAL NOTE

Job Name: Premier Inn Salisbury North Bishopdown
Job No: 332613105
Note No: 332613105/500/TN001
Date: February 2026
Prepared By: R Rogers
Subject: Existing Hotel Mitigation – For Planning

1 Overview

1.1 Introduction

- 1.1.1 This Technical Note has been prepared by Stantec, on behalf of Whitbread PLC ('the Client') to provide additional mitigation in support of development proposals at Premier Inn Salisbury North Bishopdown (the 'Proposed Development').
- 1.1.2 This note should read alongside the Nutrient Neutrality Assessment and Mitigation Strategy (NNAMS) for the Proposed Development.

1.2 Background

- 1.2.1 The Client is in the process of retrofitting water efficiency measures as part of a water stewardship programme, including at the existing rooms within the Premier Inn Salisbury North Bishopdown.
- 1.2.2 The water efficiency measures being installed include the following:
- Low Flow showerheads; reduction from the 12 litres/minute shower heads to 8 litres/minute. This would reduce water use by 4 litres/minute and based on an average shower time of 7 minutes (based on data from the Client) would equate to a reduction of 28 litres per person.
 - Low flow basin taps; reduction from the current 3 Bar 4-6 litres/minute basin taps by installing a 2 litres/minute flow restrictor. This would reduce water use by at least 2 litres/minute and assuming an average run time of 12 seconds per use, with up to 6 uses per day this would equate to a 2.4 litres per person reduction.
 - Lower capacity toilet flushes; installing a cistern filler with an adjustable fill volume flow valve. Reduction in effective flush volume from 4.5 litres to 2.9 litres per use and assuming up to four uses per day this would equate to a reduction of 6.4 litres per person.
- 1.2.3 Whilst all three measures outlined above would reduce water usage within the existing hotel, to provide a conservative approach only the reduction provided through the low flow showerheads has been taken forward. This equates to approximately 75% of the overall expected reduction from the water efficiency measures. Specifications for the upgraded appliances are appended to this note.
- #### 1.3 Scope
- 1.3.1 This note will assess the current nutrient load from wastewater from the existing hotel rooms and the post-installation nutrient load from wastewater, with the water efficiency devices in place. Reducing the wastewater discharge will result in a net reduction in the overall nutrient loading, which could be used as mitigation credits to offset the nutrient budget of the proposed development.

TECHNICAL NOTE

1.3.2 Consultation with Natural England was undertaken through a meeting on 1st October 2025.

2 Nutrient Loading from the Wastewater

2.1 Overview

2.1.1 For the existing hotel, both water usage and occupancy data have been obtained from 2016 to the present day. This will be used to calculate the current and post-installation nutrient loading from wastewater (Stage 1 of the NE Nutrient Calculator). Room utilisation per year, together with water use per person for the existing and proposed development, was calculated from site-specific commercial data provided by the Client. The figures presented below have been rounded for the purpose of presenting in this report and therefore may include minor rounding discrepancies.

2.2 Existing Nutrient Loading

2.2.1 **Table 2.1** presents the data for each hotel relating to occupancy and water usage provided by the Client. Averages have been calculated based on data between 2016 and 2025. The average sleeper ratio is the number of guests per room as a ratio of the maximum number of occupants of the room calculated by the Client for their financial model. To note, the water usage meter data accounts for the onsite restaurant resulting in a high average water usage per guest.

2.2.2 A copy of the data is provided in **Appendix A**.

Table 2.1: Existing site data

Hotel Site	No. Rooms	Average % Occupancy	Average Sleeper Ratio	Average Daily Water Usage per Guest (l/d)	Average Annual Water Usage (m ³ /yr)
Salisbury North Bishopdown	121	74.86	1.6	131	6,919.69

2.2.3 It is assumed the hotel discharges wastewater to Salisbury WwTW which is located in the Hampshire Avon catchment. The associated permits are presented in **Table 2.2**, these have been extracted from the NE Nutrient Calculator for the Hampshire Avon.

Table 2.2: Wastewater Permits

Hotel Site	Wastewater Treatment Works	Current Permit (mg TP/l)	Post-2030 Permit (mgTP/l)
Salisbury North Bishopdown	Salisbury	1	0.25

2.2.4 In accordance with the Levelling Up and Regeneration Act (LURA), the phosphorus permit at Salisbury WwTW will be upgraded to 0.25 mgTP/l by 2030. Therefore, the assessment will consider two scenarios in line with the change in permits.

2.2.5 Using the data represented in **Tables 2.1** and **2.2**, the existing nutrient loading from the wastewater has been estimated and are presented in **Table 2.3**. The post-2030 scenario is included as a theoretical future baseline should the water efficiency measures not be implemented.

TECHNICAL NOTE

Table 2.3: Baseline nutrient loading from Wastewater

Scenario	No. Rooms	Permit (mg TP/litre)	Average Water Usage (l/day)	Annual wastewater TP Load (kgTP/yr)
Current	121	1	18,945.09	6.22
Post-2030	121	0.25	18,945.09	1.55

- 2.2.6 **Table 2.3** shows that the total existing nutrient loading from wastewater from Premier Inn Salisbury North Bishopdown is **6.22 kgTP/yr**. This would be reduced to **1.55 kgTP/yr** following the scheduled permit upgrades at the WwTW.

2.3 Post-Installation Nutrient Loading

- 2.3.1 As explained in **Section 1.2**, the water efficiency measures will reduce each person's water usage by 28 l/day. Alongside the number of guests at each site, this can be used to calculate the reduction in the average annual water usage (l/day). In consultation with NE, it was requested an additional 10 l/p/d buffer included in the assessment of future water usage to account for potential changes to less water efficient fittings throughout the lifetime of the development.
- 2.3.2 The number of rooms occupied per night is calculated by multiplying the No. of Rooms by the Average % Occupancy. This is converted to per year by dividing by 365.25. the number of guests per year is estimated by multiplying the average sleeper ratio.

Table 2.4: Reduction in water usage

Hotel Site	No. Rooms per Night	No. Rooms per Year	No. Guest Year	Average Daily Water Usage per Guest (l)	Daily Total Water Reduction (l/day)
Salisbury North Bishopdown	90.58	33,084.46	52,935.14	112.72	2,608.71

- 2.3.3 Using the data represented in **Tables 2.1** and **2.4**, the post-installation nutrient loading from the wastewater has been estimated and are presented in **Table 2.5**.

Table 2.5: Post-installation nutrient loading from Wastewater

Scenario	No. Rooms	Permit (mgTP/litre)	Post-installation Average Annual Water Usage (l/day)	Annual wastewater TP Load (kgTP/yr)
Current	121	1	16,336.38	5.37
Post-2030	121	0.25	16,336.38	1.34

- 2.3.4 **Table 2.5** shows that the total post-installation of water saving measures nutrient loading from wastewater is **5.37 kgTP/yr** for the existing hotel rooms, reducing to **1.34 kgTP/yr** following the scheduled permit upgrades at the WwTW.

TECHNICAL NOTE

2.4 Nutrient Credits

- 2.4.1 Based on the calculation of existing and post-installation nutrient loading from wastewater, there is a net reduction in nutrient loading in the catchment, as presented in **Table 2.6**.

Table 2.6: Nutrient Credits

Permit Scenario	Existing Annual wastewater TP Load (kg TP/yr)	Post-installation Annual wastewater TP Load (kg TP/yr)	Net Change (kgTP/yr)
Current	6.22	5.37	0.85
Post-2030	1.56	1.34	0.21

- 2.4.2 The generated surplus can be used as nutrient credits to offset proposed development within the catchment. A copy of the calculations are appended to this note.

3 Summary

- 3.1.1 This note calculated the current nutrient load from wastewater from the existing hotel rooms at the Premier Inn Salisbury North Bishopdown, as well as assessed the post-installation nutrient load from wastewater with the water efficiency devices in place.
- 3.1.2 The assessment has been based on the existing data provided by the client, covering occupancy and water usage.
- 3.1.3 Calculation indicated a net reduction in the nutrient loading from wastewater, the surplus is calculated to **0.85 kgTP/yr**, reducing to **0.21 kgTP/yr** following the scheduled permit upgrades at Salisbury WwTW in 2030. This can be used as a nutrient credit to offset development within the catchment.

DOCUMENT ISSUE RECORD

Technical Note No	Rev	Date	Prepared	Checked	Reviewed (Discipline Lead)	Approved (Project Director)
332613105/500/TN001	-	09/01/26	RR	EJ	GN	GN
332613105/500/TN001	A	09/02/26	RR	GN		GN

This report has been prepared by Stantec UK Limited ('Stantec') on behalf of its client to whom this report is addressed ('Client') in connection with the project described in this report and takes into account the Client's particular instructions and requirements. This report was prepared in accordance with the professional services appointment under which Stantec was appointed by its Client. This report is not intended for and should not be relied on by any third party (i.e. parties other than the Client). Stantec accepts no duty or responsibility (including in negligence) to any party other than the Client and disclaims all liability of any nature whatsoever to any such party in respect of this report.

Stantec UK Limited, Lakeside House, Blackbrook Business Park, Blackbrook Park Avenue Taunton TA1 2PX
T: +44 (0)1823 218 940 E: Taunton.UK@stantec.com

TECHNICAL NOTE

Appendix A

Water Efficiency Measures

Nutrient Loading Calculations

Appendix E Consultation



Project
Number:
332613105

Date: 25 February 2026



**Roberta Rogers
Stantec**

BY EMAIL

Customer Services
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6JC

T 0300 060 3900

Dear Roberta

Extension of 12 new hotel rooms at the Premier Inn, Salisbury North, Bishopdown.

Thank you for consulting Natural England on the proposals for demonstrating phosphorus neutrality for the development of an extension of 12 new hotel rooms at Premier Inn Salisbury North, Bishopdown.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

The following advice is based upon the information within the following documentation:

- Nutrient Neutrality Assessment and Mitigation Strategy. Premier Inn, Salisbury North, Bishopdown. Stantec UK Limited. Project Number 332613105. Dated February 2026.

Natural England considers that developments that would lead to an increase phosphorus discharge within the River Avon hydrological catchment are likely to have significant effects on the River Avon Special Area of Conservation (SAC) and therefore will require an Appropriate Assessment (AA).

Phosphorus Budgets

The Salisbury North Premier Inn discharges to the Salisbury Waste Water Treatment Works (WWTW). Salisbury WWTW has an existing phosphorus permit of 1 mg/l which will reduce to 0.25 mg/l post 2030.

Based on an occupancy rate per room of 1.6 people with a 75% annual occupancy and water use of 110 litres per person per day (ppd) (based on an average water use of 128 l ppd – 28 l ppd from water saving measures + 10 l ppd buffer) the proposed 12 room extension will result in a phosphorus loading to the River Avon hydrological catchment of **0.62 kg TP Yr** prior to 2030, falling to **0.16 kg TP yr** after the WWTW's upgrade has been completed in 2030.

Natural England has no concerns with the submitted calculations.

Proposed Mitigation Measures

In order to achieve phosphorus neutrality the scheme relies on the installation of water saving measures in the existing 121 rooms at the Premier Inn Salisbury North, Bishopdown.

The phosphorus budget for the existing 121 room hotel prior to 2030 is calculated as **6.22 Kg TP Yr** (based on an existing water use of 131.72 l ppd, a 1.6 occupancy rate per room and a 74.86% annual

occupancy). With the use of the water saving measures specified the water use per person per day (ppd) will reduce by 28 l. Natural England has advised that a 10 l ppd buffer is applied to the final water use and this has been incorporated in the final calculations. Water use after the installation of the specified water saving measures is therefore 112.72 l ppd.

The nitrogen budget for the hotel after the installation of the water saving measures is calculated as **5.37 Kg TP Yr**, thereby generating a phosphorus saving credit of **0.85 Kg TP Yr** which may be used as mitigation for the scheme pre 2030. After 2030 the benefits of the water saving measures will reduce to **0.21 Kg TP Yr** (based on a phosphorus budget of 1.55 Kg TP Yr at current water use levels reducing to 1.34 Kg TP Yr after the installation of the water saving measures).

Summary

The 12 room extension of the Salisbury North, Bishopdown Premier Inn requires 0.62 kg TP yr prior to 2030, falling to 0.16 Kg TP Yr after 2030. Therefore after the installation of the water saving measures the scheme will generate a pre-2030 phosphorus surplus of **0.23 Kg TP Yr** (0.85 – 0.62) which may be used as temporary phosphorus credits for future development up to 2030. Post 2030 the scheme generates a surplus of **0.05 Kg TP Yr** (0.21 – 0.16) which may be used as permanent credits for future development.

Natural England has no objection to the mitigation measures proposed and is satisfied that the phosphorus budget calculations provided within the NNAMS have demonstrated that additional phosphorus discharges to the River Avon catchment will be avoided. The water saving measures set out in the NNAMS must be completed in full prior to the occupation of the proposed hotel extension and thereafter retained.

Please note it is the Competent Authority's responsibility to ensure that they are confident that there is sufficient information to support the values used in the phosphorus calculations and that the nutrient budget calculations are correct.

The Planning Authority will also need to be satisfied that the mitigation measures can be fully secured by any permission.

The advice provided is the professional advice of the Natural England adviser named below. It is the best advice that can be given based on the information provided so far. Its quality and detail is dependent upon the quality and depth of the information which has been provided. It does not constitute a statutory response or decision, which will be made by Natural England acting corporately in its role as statutory consultee to the competent authority after an application has been submitted. The advice given is therefore not binding in any way and is provided without prejudice to the consideration of any statutory consultation response or decision which may be made by Natural England in due course. The final judgement on any proposals by Natural England is reserved until an application is made and will be made on the information then available, including any modifications to the proposal made after receipt of discretionary advice. All pre-application advice is subject to review and revision in the light of changes in relevant considerations, including changes in relation to the facts, scientific knowledge/evidence, policy, guidance or law. Natural England will not accept any liability for the accuracy, adequacy or completeness of, nor will any express or implied warranty be given for, the advice. This exclusion does not extend to any fraudulent misrepresentation made by or on behalf of Natural England.

For any queries relating to the specific advice in this letter please contact John Stobart on 07825 844475. For any new consultations or issues, please contact consultations@naturalengland.org.uk.

Yours sincerely

John Stobart
Planning and Conservation Senior Advisor

[Redacted signature block]

MINUTES

Meeting Title: Premier Inn Sites – Natural England Meeting

Attendees: John Stobart (Natural England)
 Rozalind Tuck (Natural England)
 Owen Ellender (Whitbread)
 Gemma Nelmes (Stantec)
 Roberta Rogers (Stantec)
 Eleanor Jones (Stantec)

Date of Meeting: 01st October 2025

Job Number: 332613105

Item	Subject	Actions
Site Overview	RR provides an overview of the Premier Inn proposed extension sites within the southwest that lie within nutrient neutrality catchments including the Somerset Levels, Poole Harbour, Hampshire Avon, and the Solent. Mitigation will be provided through retrofitting water efficiency measures at other Premier Inn Hotels within the catchment. Additional mitigation will be provided through third-party credits where required. The approach is the same which was adopted as part of the consented Dorchester Premier Inn application. JS stated that the Solent sites would be out of their area and would need to be discussed with the NE team that covers the Solent region.	
Nutrient Budget	RR outlines the nutrient budgets for each site has been based on data from the existing hotel and that surface water budget is discounted due to no change in commercial/industrial area. OE confirms that the premier inn extensions are all existing developed land (brownfield) JS confirms that discounting the SW budget is suitable based on this. RR explains that for some of the existing Premier Inn hotels, the water usage records include an onsite restaurant and therefore overestimate the water usage per hotel guest. In this instance, the average water usage from nearby Premier Inn hotel has been used, as was the approach adopted in Dorchester. JS raises the average might not be very conservative and requests if the maximum could be used instead. RR confirms Stantec will analyse the water usage data further and see if the maximum would be more suitable.	Stantec to further analyse water usage data for sites with restaurants
Mitigation	RR outlines the approach to calculating the number of credits which will be generated from the water efficiency upgrades, this includes calculating the pre and post implementation nutrient load based on existing data for the hotels and the permits at the WwTWs. It is assumed the water efficiency upgrades will reduce the water usage per person per day by 28l, this is based on the calculations for the low flow showerheads.	Stantec to request P/N discharge levels data from water companies to sense check

MINUTES

Item	Subject	Actions
	All WwTW included in this assessment are being upgraded to TAL post-2030 in accordance with the LURA. Therefore, permanent credits (post-2030) generated the water efficiency upgrades have been based on the TAL permits for all sites. A number of the WwTWs already have a permit in place pre-2030. Therefore, where water efficiency upgrades are to a Premier Inn hotel which drains to the same WwTW as the proposed development and which already has a current permit in place, the temporary credits have been based on this current permit. JS confirms this is a suitable approach. RR explains there are a number of WwTW included in the assessment which are currently unpermitted but due to be upgraded to TAL by 2030. In this scenario, Stantec propose the temporary credits are calculated based on the TAL permits. This is considered a suitably precautionary approach as the discharge from the WwTW is expected to be a significantly higher concentration. JS explains that NE don't usually accept water retrofitting measures to WwTW that do not have a permit in place, however as this is only in the temporary scenario it may be acceptable but he would need to discuss further with colleagues to confirm as a national approach. RR suggested Stantec could request from the relevant water companies P & N discharge concentrations for the WwTW which could be used as a sense-check. JS questions if the reduction in water usage is suitably precautionary as it is based on the assumption that every guest has a shower every day. RR explains that there are further efficiency measures that will be implemented, including low flow basins and lower capacity toilet flushes, which haven't been quantified as part of this assessment. Therefore, the 28 l/p/d is considered a precautionary estimate of the reduction of water usage. JS requested a sense check of the pre-implementation assumption is undertaken against the existing water usage records and if the reduction from the additional measures could be quantified to understand the scale of the buffer in place. RR asks if for the Lymington Premier Inn site, located in the New Forest catchment, could mitigation be provided by water efficiency upgrades in the wider catchment? JS mentions that due to the tides the Solent coastal range is complex, and whilst it might be a possibility the Solent NE team will need to be consulted. JS requests Stantec provides an email summarising this information which can then be shared with the Solent team. RR outlines the mitigation for the Andover site will be provided through sites within Southampton. JS noted that some of these sites discharge into the Solent downstream of the point of impact of the proposed site. As it's a tidal range this may be suitable but will need to be confirmed with the Solent NE team.	current unpermitted discharges. Stantec to do a sense check calculation for average shower times against actual water usage. Stantec to send email regarding questions around Solent mitigation sites.

MINUTES

Item	Subject	Actions
	JS commented he is happy with the general approach taken to the assessments, but requests some additional sensitivity to make sure the approach is precautionary.	
AOB	RR explains reports for each site will be sent through which provides further detail on the assessment, these will be shared once sensitivity around water usage has been agreed with NE by email. JS/RT agreed an undefined scope to review the reports. RT to send an updated quote.	Natural England to send an updated quote