

Nutrient Statement

Project:	Eastleigh Court, Bishopstrow Wiltshire, BA12 9HW	Date:	5 th February 2026 Updated 13 th February 2026 Updated 10 th August 2026
Subject:	Nutrient statement	Author:	Nicola French

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 change of use of Eastleigh Court, Bishopstrow, Wiltshire, BA12 9HW from offices to short stay accommodation. The application also includes for the erection of an ancillary building for use as an event space and pool house, a new swimming pool, change of use of the former Eastleigh Court stables from a dwelling to short stay accommodation, landscaping, vehicle parking, a new electricity substation and all associated works. 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 unfavorable 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 Statement has been updated in response to comments received from Wiltshire Council ecology team on 7th May 2026, which objected to the proposals on account of the need for further information. Specifically, evidence has been requested to support the proposed average occupancy rate used within the nutrient budget. As before, the Statement takes full account of all information provided by WC on the Council's dedicated nutrient neutrality web page³ and draws on the calculator and guidance resources on the Government website *Tools and resources for calculating nutrient neutrality*⁴.

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>

2.0 Nutrient neutrality calculations

- 2.1. The short stay accommodation does not fit within existing use class definitions and is therefore considered Sui-Generis. It will involve:
- the conversion of the existing Eastleigh Court building to provide 14 double bedrooms, each accommodating 2 people and a bunk room accommodating four guests (32 guests)
 - the change of use and conversion of the existing stables, currently in C3 residential use, to provide 7 double bedrooms, a twin room and a bunk room for up to eight people (24 guests); and,
 - the construction of a new build pavilion (event facilities but no overnight accommodation).
- 2.2. The buildings have been designed and formulated to be used alone, together, or in any combination to provide short stay accommodation and events that may or may not take place in association with the accommodation.
- 2.3. Guidance on the Council's dedicated nutrient neutrality web page states that evidence must be submitted to show that mitigation has been provided on site as far as possible. SUDS can be designed into a scheme to reduce phosphorous in surface water runoff where infiltration rates allow and a Flood Risk Assessment & Outline Drainage Strategy (FRA & ODS) for the scheme⁵ has evaluated whether SUDS are appropriate for the Eastleigh Court proposals.
- 2.4. The FRA & ODS has identified that infiltration rates are not suitable for shallow soakaway systems for concentrated run-off disposal. It is not therefore possible to incorporate conventional SUDS into scheme design. However, investigations are on-going to establish whether deep infiltration devices can be used to establish an on-site drainage system, discharging run-off into the permeable bedrock deep below the surface. This would allow surface water to drain away from the site and would be effective in the capture of phosphorous.
- 2.5. At present, there is no certainty that this strategy is deliverable because investigations and discussions with the Environment Agency remain on-going before it can be confirmed as a viable solution. Without certainty, this approach to surface water disposal cannot be relied on for purpose of the nutrient calculation that follows, and it is not therefore included within the overall budget. However, if the surface water strategy develops to be certain that deep infiltration devices can be utilised, then these calculations can be revisited and refined to include. The calculations that follow are therefore a worst-case consideration of nutrient loading.

⁵ Subteno, February 2026. Flood Risk Assessment & Outline Drainage Strategy. Eastleigh Court. Bishopstrow. For Kindred Living Project Ltd.

2.6. **Box 1** below sets out the parameters and assumptions used to assess the additional phosphorous loading that the change of use of Eastleigh Court will generate.

Box 1: Assumptions relevant to the assessment of additional nutrient loading for the change of use of Eastleigh Court to short stay accommodation

- **Number of new bedrooms:** the planning application will allow for 21 double rooms, a twin room and 2 bunk rooms that accommodate 12 guests between them. In total, the planning application will provide facility for 56 people to stay overnight.
- **Events:** visitors to Eastleigh Court for purposes of daytime events, where no overnight stay is included, are not considered within the calculations. This is because if guests are not needing to stay, they are very likely to be living locally, and form part of the baseline nutrient loading to the River Avon. To include them within the calculations would be to double count their contribution.
- **Occupancy:** the previous occupancy level of 15.34 people per day has been reviewed in response to feedback received from Wiltshire Council ecologists. The nature of the project means that there is little substantiated data available to evidence the 27% occupancy level on which the previous nutrient budget relied. An alternative data source has therefore been sought.

Visit Britain short-stay accommodation data⁶ provides nationwide averages for occupancy and offers the best evidenced proxy available on which to base the nutrient calculations. This data shows an average occupancy of 45.9% for the four full years available not distorted by Covid (2019, 2023, 2024 & 2025) (see **Appendix 1**). However, it is most precautionary to use the highest, rather than the average occupancy for these four years as a proxy for occupation of Eastleigh Court. Data for 2019, with an average occupancy of 50.2%, is therefore most relevant. Application of this percentage to the 56 beds available overnight generates an average overall occupancy of 28.11 people per day (across both Eastleigh Court and Eastleigh Stables).
- **Residential occupancy for existing dwelling:** the stables currently has a C3 use as a single residential dwelling. It is therefore assumed to load phosphorous to the water environment of the River Avon on the basis of:
 - 2.4 occupants present for the full 365 days of the year
 - a daily water usage of 150 litres per person (advised as appropriate by Natural England because an existing property is very unlikely to have the water saving features required of new build by Building Regulations)
- **Total wastewater produced by single person for new dwellings:** 120 litres per day
- **Total wastewater produced by single person for existing dwellings:** 150 litres per day (because no water saving devices are likely fitted).
- **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 5.55ha.
- **Land use:** the area of the red line currently comprises office premises, the stables (existing residential use) and green open space laid down to formal lawns and gardens. There is no exact land use match

⁶ <https://www.visitbritain.org/research-insights/uk-short-term-rentals>

within the calculator but government guidance for use of the calculator states 'If there is a land use within the development area that is not in the list, select the most similar land use type.' the closest proxy for the site at present is **residential urban land**, defined as 'areas of houses and associated infrastructure. This is inclusive of roads, driveways, grass verges and gardens.'⁷ but with semi-natural areas of woodland and scrub identified separately. Using the habitats identified by the BNG metric, the scheme can be broken down into three land uses as follows:

BNG metric definitions		Nutrient calculator		
Broad habitat type	Habitat type	Land use category	Area	Comment
Urban	Artificial unvegetated, sealed surface	Residential urban	0.0189	
Urban	Developed land sealed surface	Residential urban	0.7550	
Urban	Introduced shrub	Residential urban	0.0055	Gardens
Heathland & shrub	Mixed scrub	Shrub	0.1015	Semi-natural scrub at margins of site
Grassland	Modified grassland	Residential urban	3.9073	Lawns and open space
Woodland & forest	Other woodland, mixed	Woodland	0.7667	
Total area			5.5549	

- **Proposed development:** Once the scheme has been implemented, much of the open space will be managed as Other Neutral Grassland to deliver against the Biodiversity Net Gain objectives. Nutrient inputs will cease, all arisings will be removed from site and the grassland will be oversown with a wildflower mix. This landuse is best described as **Greenspace** within the calculator. Other uses are as follows:

BNG metric definitions		Nutrient calculator		
Broad habitat type	Habitat type	Land use category	Area	Comment
Urban	Developed land sealed surface	Residential urban	0.4388	
Urban	Vegetated garden	Residential urban	0.0259	Gardens
Lakes	Ponds (priority habitat)	Water	0.087	
Heathland & shrub	Mixed scrub	Shrub	0.1713	Semi-natural scrub at margins of site
Grassland	Modified grassland	Residential urban	3.9073	Lawns and open space
Grassland	Other neutral grassland	Greenspace	0.1579	Habitat created for purpose of BNG
Woodland & forest	Other woodland, mixed	Woodland	0.7667	
Total area			5.5549	

⁷ <https://www.gov.uk/guidance/using-the-nutrient-neutrality-calculators>

- 2.7. 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 conversion of Eastleigh Court and stables to an events facility with short-term accommodation.

Water infrastructure information	
Description of required information	Data entry column - user inputs required
Date of first occupancy (dd/mm/yyyy):	01/06/2027
Average occupancy rate (people/dwelling or people/unit):	28.11
Water usage (litres/person/day):	120
Development proposal (dwellings/units):	1
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):	28.11
Wastewater by development (litres/day):	3373.44
Annual wastewater TP load (kg TP/yr):	0.28
Pre-2030 wastewater nutrient loading	
Annual wastewater TP load (kg TP/yr):	0.55

- 2.8. The calculations show that the treatment of foul from the new facility will generate **0.55kg** of Total Phosphorous per year in the period up to 2030 prior to the upgrade of the Warminster WWTW, and **0.28kg** 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.
- 2.9. 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 Assessments⁸. It is therefore reasonable to assume that the loading will reduce on upgrade of Warminster WWTW in 2030.
- 2.10. 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. Both stages are set out on the following page, using the categorizations described in Box 1.

⁸ <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):	900.1 - 950	
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)
Residential urban land	4.69	8.68
Shrub	0.10	0.00
Woodland	0.77	0.02
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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	4.37	8.09
Greenspace	0.16	0.00
Shrub	0.17	0.00
Woodland	0.77	0.02
Water	0.09	0.00
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Totals:	5.55	8.12

2.11. 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):	0.28
Net land use TP change (kg TP/year):	-0.58
TP budget:	-0.30
TP budget + 20% buffer:	-0.30
Annual nutrient budget	
The total annual phosphorus load to mitigate is (kg TP/yr):	0.00
Pre-2030 nutrient budget	
The total annual phosphorus load to mitigate is (kg TP/yr):	0.00

2.12. The calculations show that development of Eastleigh Court as an event space with short term residential accommodation will reduce total phosphorous loading to the water environment by 0.30kg TP once built out and operational. No mitigation is required to secure a net neutral scheme.

2.13. However, this does not represent the final reduction in loading to the water environment, because Eastleigh Stables is currently in lawful operation as a residential dwelling and the current loading of this use will cease in favour of the new sui generis use once the proposed scheme is consented and operational.

2.14. The River Avon nutrient calculator can be used to calculate the current loading of Eastleigh Stables to the water environment on the basis of the parameters set out in Box 1 (occupancy of 2.4 and daily water usage of 150 litres per person), the nutrient calculator calculates that the current will release 0.06kg of TP/year pre 2030, reducing to 0.03kg TP per year post 2030 (see Stage 1 on the following page).

Water infrastructure information	
Description of required information	Data entry column - user inputs required
Date of first occupancy (dd/mm/yyyy):	01/01/2028
Average occupancy rate (people/dwelling or people/unit):	2.40
Water usage (litres/person/day):	150
Development proposal (dwellings/units):	1
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):	2.40
Wastewater by development (litres/day):	360.00
Annual wastewater TP load (kg TP/yr):	0.03
Pre-2030 wastewater nutrient loading	
Annual wastewater TP load (kg TP/yr):	0.06

- 2.15. Stages 2 & 3 of the calculator are not relevant to this calculation as the conversion of Eastleigh Stables will not change the land use in terms of the definitions within the calculator (existing will be classed as a residential urban land use, as will the proposed scheme) does not involve a change of land use. Furthermore, advice received from Natural England is that it is not appropriate to apply the 20% buffer to this calculation, because it would work in the other direction to the assessment of the loading from the proposed solution. This would mean that inclusion of the 20% buffer would result in a less precautionary calculation. Stage 4 is therefore excluded from this assessment, to leave the final existing loading of Eastleigh Stables at 0.06kg of TP/year pre 2030, reducing to 0.03kg TP per year post 2030.
- 2.16. This loading will cease once the new sui generis use for Eastleigh Court is confirmed and the new proposals are operational. The cessation of use of Eastleigh Stables as a residential dwelling will reduce the phosphorous saving to the water environment still further. When considered together with the saving calculated under para 2.11, the overall scheme will save 0.36kg TP to the water environment pre 2030, reducing to 0.33kg TP post 2030.
- 2.17. Installation of deep infiltration devices as part of a drainage strategy for the scheme will also reduce phosphorous loading. However, without certainty as to design and installation, these cannot be relied upon for purposes of the phosphorous calculations and subsequent appropriate assessment.
- 2.18. **No mitigation is required** to secure a nutrient neutral scheme either pre or post 2030.

3.0 Conclusion

- 3.1. A nutrient budget calculated in line with the current Natural England guidance and calculator for the change of use of Eastleigh Court from offices to short stay accommodation with various ancillary on land at Eastleigh Court, Bishopstrow shows that the proposed scheme will reduce phosphorous loading to the water environment, securing the scheme as better than nutrient neutral.
- 3.2. For purpose of Appropriate Assessment under the Habitats Regulations, this allows Wiltshire Council to conclude that the scheme 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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Appendix 1
Visit Britain short-stay accommodation data
2019, 2023-2025

Appendix 1

Visit Britain short-stay accommodation data 2019, 2023-2025

Visit Britain UK Short Term Lettings data (May 2026 Report)													
https://www.visitbritain.org/research-insights/uk-short-term-rentals													
	Jan	Feb	Mar	Ap	Ma	Ju	Jul	Aug	Sep	Oct	Nov	Dec	Average
2019	41.4%	45.1%	45.1%	51.8%	52.7%	55.0%	59.0%	63.7%	52.2%	48.5%	42.4%	45.1%	50.2%
2023	42.0%	45.2%	43.2%	49.4%	49.0%	51.1%	54.8%	57.2%	49.9%	44.5%	39.7%	43.1%	47.4%
2024	37.3%	36.1%	40.7%	42.1%	46.8%	46.8%	51.2%	55.5%	46.6%	43.4%	38.6%	40.5%	43.8%
2025	35.0%	37.8%	36.6%	43.3%	43.0%	42.8%	48.3%	53.8%	45.3%	43.0%	37.2%	39.8%	42.2%
2026	34.6%	37.2%	36.7%	42.3%	44.6%	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a