

Nutrient Statement

Project:	Seven Stars, Bottlesford, SN9 6LW	Date:	15 th May 2026
Subject:	Nutrient neutrality calculation	Author:	Nicola French

1.0 Background

- 1.1. This Nutrient Statement has been prepared to provide information to Wiltshire Council (WC) in support of a full planning application for the change of use of Seven Stars, Bottlesford, SN9 6LW. The scheme includes for 12 new guest rooms in place of 2 existing rooms, alongside a new staff flat for a couple which replaces an existing staff flat designed to accommodate the same occupancy.
- 1.2. The information within this Nutrient Statement is provided under Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (the Habitats Regulations).
- 1.3. In January 2024, Defra issued a policy paper¹ notifying the designation of catchments sensitive to nutrient pollution. This includes the Habitats Sites of the River Avon identified as being in unfavourable condition on account of phosphorus pollution². The implication of this is that any local planning authority within the catchment of the River Avon cannot grant consent for new residential development unless it can be shown to be net phosphorus neutral. A phosphorus calculation is therefore required to ensure that WC has sufficient information to carry out an appropriate assessment to consider the impacts of the application on the River Avon Habitats Sites.
- 1.4. This note takes full account of all information provided by Wiltshire Council on the Council's dedicated nutrient neutrality website³. The note also draws on the calculator and guidance resources on the Government website *Tools and resources for calculating nutrient neutrality*⁴, most recently updated on 27th May 2025.

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 Phosphorus budget

2.1. **Box 1** below, sets out the parameters and assumptions used to assess the additional phosphorus loading that will be generated by the proposed scheme.

Box 1: Assumptions relevant to the assessment of additional nutrient loading for x10 new additional guest rooms and x1 staff flat

- **New overnight accommodation:** x12 new additional guest rooms replace 2 existing guest rooms to give a net increase of x10 rooms. In addition, the proposals allow for a staff flat for two people, replacing a staff flat accommodating the same occupancy resulting in no net increase in staff accommodation (the existing cancels out the new). The nutrient budget therefore addresses the loading from an increase of x10 guest rooms only.
- **Occupancy:**
 - **New guest rooms:** 2 residents (average occupancy of 2.0 people) for each of the 10 new guest rooms (net increase). Guest rooms are not occupied every night and have an average occupancy 79% across a single year giving an equivalent to 1.58 people per room (see Appendix 1 for evidence base).
- **Total wastewater produced by single person:**
 - **New guest rooms:** x10 new guest rooms will be specified according to the water saving measures required by Building Regulations. Allowing for a 10litre buffer, total wastewater is taken as 120 litres of water per day, per person.
- **Method of waste processing:** Foul is assumed to be treated at the Pewsey Waster Water Treatment Works (WWTW)
- **Land use:** the red line area of the development scheme comprises the current site of Seven Stars and is best classed as **residential urban land**.
- **Land use budget:** The total area of the plot is 0.4776ha
- **Proposed development:** once developed, the land use remains unchanged and remains classed as **residential urban land**.

2.2. The most recent Natural England Phosphorus Calculator for the River Avon has been used to calculate the nutrient load generated by the x10 new guest rooms (see below)

Water infrastructure information	
Description of required information	Data entry column - user inputs required
Date of first occupancy (dd/mm/yyyy):	01/07/2027
Average occupancy rate (people/dwelling or people/unit):	1.58
Water usage (litres/person/day):	120
Development proposal (dwellings/units):	10
Wastewater treatment works:	Pewsey WwTW
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):	15.80
Wastewater by development (litres/day):	1896.00
Annual wastewater TP load (kg TP/yr):	0.16
Pre-2030 wastewater nutrient loading	
Annual wastewater TP load (kg TP/yr):	0.62

Stage 1: calculation of phosphorous loading from treatment of wastewater by the 10 new guest rooms

- 2.3. The calculations show that the treatment of foul from 10 new guest rooms will generate 0.62kg of Total phosphorus per year once occupied pre-2030, dropping to 0.16kg TP post 2030.
- 2.4. 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.
- 2.5. 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 Assessments⁵. It is therefore reasonable to assume that the loading will reduce on upgrade of Pewsey WWTW in 2030.
- 2.6. To address the overall net nutrient budget for the scheme, it is important to also consider how rates of phosphorus leaching from the ground will change in response to a changed land use. Stages 2 & 3 of the calculation assess the Total phosphorus loading to the water environment that is currently taking place and compares this to the loading that will occur once the new rooms are occupied. For this scheme, stages 2 & 3 cancel out because there is no change in land use. Therefore, they are not included within this document, although the relevant sections of the calculator have been populated for completeness.

⁵ <https://www.gov.uk/guidance/nutrient-neutrality-update>

- 2.7. Finally, the calculator generates a net phosphorus loading for the scheme to take account of both loading from treated foul and the change of use of the land for development (no change in this instance). This is set out in Stage 4, below.

Total nutrient budget calculations	
Description of values generated	Values generated
Wastewater TP load (kg TP/year):	0.16
Net land use TP change (kg TP/year):	0.00
TP budget:	0.16
TP budget + 20% buffer:	0.19
Annual nutrient budget	
The total annual phosphorus load to mitigate is (kg TP/yr):	0.19
Pre-2030 nutrient budget	
The total annual phosphorus load to mitigate is (kg TP/yr):	0.74

Stage 4: total phosphorous loading resulting from the 10 new guest rooms

- 2.8. The calculations show that the x10 new guest rooms will generate **0.74kg** of total phosphorus (TP) per year once built and occupied pre 2030 dropping to **0.19kg** TP per year post 2030.
- 2.9. To ensure net phosphorus neutrality, **mitigation is required** to address the additional phosphorus load that the guest rooms and staff flat will generate.

3.0 Mitigation requirements

- 3.1. A Council-led scheme to provide phosphorus credits is available for planned development. The credits can be purchased to offset the additional loading identified and demonstrate nutrient neutrality. Wiltshire Council must consider that development schemes are planned development to qualify for the scheme.
- 3.2. This scheme is planned development because it falls under Core Policy 39 as a proposal relating to tourist development, inclusive of hotels, bed & breakfasts, guest houses and conference facilities.
- 3.3. As a minor application, guidance on the Wiltshire Council website states that consent can be granted through use of a Grampian condition. This will allow the application to be determined, with a payment due on commencement of the development. The charge covers the cost of delivery of the mitigation projects and is re-invested back into delivering further mitigation projects.

4.0 Conclusion

- 4.1. A nutrient budget calculated in line with the most current Natural England guidance and calculator for the provision of 10 new guest rooms, shows that the scheme will generate a surplus of 0.74kg TP per year pre 2030 dropping to 0.19kg TP post 2030.
- 4.2. To offset this additional loading, and in line with advice available from WC's website, consent can be granted with a Grampian condition precluding the start of development until mitigation has been secured from WC's own mitigation scheme, or other, alternative ratified scheme if it becomes available. With this condition in place, WC can conclude that the proposed residential property will not adversely affect the integrity of the River Avon SAC, either alone or in combination with other plans and projects.

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Report highlights

Hotel room occupancy for December 2025 was 73%, down 2 percentage points compared to December 2024. This is supported by a decline in demand for rooms of -2.9%, whilst supply was down to a lower degree of -0.8%. Overall, 2025 occupancy was stable at 79%, on par with 2024.

<https://www.visitbritain.org/research-insights/england-hotel-occupancy-latest>