



Nutrient Neutrality Statement

Redevelopment of Knoll House Hotel

October 2022

Introduction

This interim Statement has been prepared having regard to Regulation 63 of the Conservation of Habitats and Species Regulations (the Habitat Regulations) in the context of proposals to redevelop Knoll House Hotel which is an existing hotel, located on the edge of the catchment area of Poole Harbour.

It is recognised that the Poole Harbour SPA and Ramsar site is a water habitat which is at threat from nutrient enrichment causing eutrophication. Its protected designation requires the preservation of its nature conservation status and is afforded protection by the Habitat Regulations. Accordingly, any proposals which give rise to potential for significant adverse effects on the designated sites should be subject to an Appropriate Assessment. The threshold for such assessments is low and the burden of proof is high. It has been determined, by the Courts, that mitigation cannot be taken into account in screening such proposals.

In this case, a shadow Habitat Regulation Assessment has been prepared alongside the development proposals. This is aside from the Environmental Impact Assessment prepared, pertaining to the Town and Country Planning Environmental Impact Assessment) Regulations 2017.

The Proposed Development

The proposed redevelopment of Knoll House includes the complete demolition of the existing hotel (save for a small area of the main house) and construction of:

- A 30bed hotel (C1);
- 22no apartment units (C3 restricted to holiday use);
- 26no garden villas (C3 restricted to holiday use); and
- Ancillary spa and facilities.

The proposal will also include provision of a new drainage system, replacing the existing antiquated system. It will include a sustainable and controlled rate of surface water discharge and efficient foul water system. In drainage terms, the proposal will offer a range of sustainable drainage benefits.

The proposal will include overnight accommodation, but it will result in a reduction in the number of people staying on site, as follows:

- Existing bed space capacity: 339 people; and
- Proposed bed space capacity: 296 people.

Nutrient Budget Calculator

The publication of a Nutrient Budget Calculator has been done to aid the preparation of a nutrient budget in order to determine potential effects. Guidance has been prepared to support this and is set out in the Nutrient Budget Guidance Document, March 2022 prepared by Ricardo Environmental. It has been designed to accompany residential proposals and makes a series of assumptions related to reasonable water usage per person and average occupancy levels for each new dwelling. It identifies a broad approach, using national occupancy data, of 2.4 residents per dwelling. However, it does recognise that locally, more accurate, occupancy levels may be required by agreement with the Local Planning Authority. It also assigns a realistic usage of 120litre per person per day.

Alongside the calculation of nutrient budget for proposals which introduce overnight accommodation within the affected catchment, it also recognises the potential for existing uses to generate nutrient impacts, such as existing farmland.

It is important that assessments are based on consistent assumptions and adopt a precautionary approach.

The nature of the complexities of matters relating to changes in land use and particular uses, makes it difficult for the calculator to be flexible. In this case, the change from one form of holiday use (C1) to another (a mix of C1 and restricted C3), is a form of development not recognised by the calculator.

Notwithstanding the inflexible nature of the nutrient calculator, a precautionary approach has been adopted to the proposed development in any event. This has included the significant reduction in the capacity of the site for overnight accommodation. The relative reduction in people staying onsite will deliver a reduction in foul water, before the adoption of any further enhancement measures.

The enhancement measure includes the delivery of a more efficient drainage system, utilising more efficient white goods and sanitary ware, replacing the aging provision currently in use.

The reduction in overnight accommodation will result in a nutrient credit and will offer material benefits to the nature conservation interests of the designated sites in proximity to the proposal. In this case, a precautionary and sensitive approach has been adopted to the proposals. This is also aligned to key considerations relating to recreational pressures on the designated heathlands in the area, also having regard to Reg63 of the Habitat Regulations.

Conclusion

The relative reduction in capacity of the proposal, when assessed against the existing use of the hotel, which is unregulated will result in a nutrient credit.