

Land Adjacent Harvest Lane Charlton Horethorne Somerset

51.010243 -2.483002

Phosphate Neutrality Assessment

S23-884/PNA August 2023

Revision 2

Prepared by :

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Hopkins Developments Limited The Tythings Commercial Centre Southgate Road Wincanton Somerset BA9 9RZ



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1.0 Introduction

Southwest Environmental Limited have been commissioned by Hopkins Developments Limited to produce a Phosphate Neutrality Assessment for the proposed development at Land Adjacent Harvest Lane.

2.0 The Site

The site comprises an area of land forming an agricultural field enclosure. Length is approx. 280 in long axis. The land slopes from west to east. Fall is from 145mAOD to 130mAOD, equating to approximately 15m. Fall is around 20 meters from north to south, this equates to a gradient of c. 5%. The proposal would see 2no. 1 bedroom flats and, 2no. 2 bedroom flats (modelled as dwellings) and 27no. Residential dwellings, illustrative master plan indicates significant green infrastructure areas, with strategic tree planting at various points within the site.

3.0 Background

Recent CJEU Dutch Nitrogen case law relating to impacts of nutrient laden water impacting on sensitive ecological sites, has highlighted a requirement to mitigate against effluent out flows from proposed developments.

The application site falls within the catchment flowing into the Somerset Levels and Moors RAMSAR, designated for its rare aquatic invertebrates. There is a major issue with nutrients entering watercourses which adversely changes environmental conditions for these species.

Any new housing, including single dwellings, will result in an increase in phosphates contained within water discharge. As the designated site is in 'unfavourable' condition any increase, including from single dwellings, is seen as significant, either alone or in combination with other developments.

Whilst this report is not a Habitats Regulation Assessment, it would be the principal piece of information used to guide the outcome of a Habitats Regulations Assessment. A Habitats Regulation Assessment would screen for affected sites of high importance, which might be influenced by the project.

In this instance we are dealing with cumulative impacts, as the individual impact from this project would be unmeasurable at the receptor location, which is approximately 15 miles downstream of proposal.

The receptor has been identified as Somerset Levels and Moors RAMSAR, the substance of concern is Phosphate. A mitigative response to phosphates arising from the proposed development is suggested within this report.

Most aquatic systems are naturally low in biologically available P. So, when P availability increases, aquatic plants tend to grow rapidly and cause degradation of water quality (e.g. algal blooms).



4.0 Scope

In order to complete a Habitats Regulations Assessment Natural England require a calculated response for mitigation i.e. information on how additional P. from foul water is to be dealt with.

"Natural England advise that mitigation will need to be identified and secured by the applicant in order to complete the [NE's] Habitats Regulations Assessment."

In previous correspondence further advice has been given regards to mitigation:

"Alternatively an applicant may source their own mitigation. For Package Treatment Plant this can be a small wetland, specifically designed to remove phosphates, its area depending on the amount of phosphate kilograms produced form the proposed development per year."

5.0 Impact Assessment

The potential impacts from the project are now reviewed based on the Source, Pathway, Receptor Model.

5.1 Source

There are numerous sources of phosphate that contribute to phosphorous found in domestic waste water¹.

Table 5 Source apportionment of P in raw domestic waste water (Defra 2008)					
Source		Contribution			
Faeces		23%			
Urine		41%			
Food wa	ste	5%			
Mains su (phospha	pply ate added to reduce lead in dri	5% nking water)			
Toothpas	ste	1%			
Dishwash	her detergent	7%			
Laundry	detergent	18%			

In February 2021 Somerset and West Taunton released their Phosphate Budget Calculator Version 3.1², which indicates a budget of 0.99kg/phosphate/year per person. This calculator is now used across Somerset Unitary Authority.

¹ <u>https://www.sepa.org.uk/media/163158/crew_septic_tanks.pdf</u>



The Phosphate Budget Calculator accounts for Flats, Houses and Guest Houses. For other types of development it is assumed consultants are intended to make their own calculations.

It is proposed to use an Iron Dosing Klargester Adopted by Albion Water at 95% efficient (0.3mg/l). This is the source we have considered in the budget calculation.

5.2 Pathway

The pathway from site, to receptor is via lateral drain, to the onsite treatment system as described below. Effluent from the system then flows in to ground water. This surface water then supports seasonal flow of tributaries of ultimate the River Parrett flowing towards the Somerset Levels, where the receptors arelocated.

5.3 Receptor

The receptor of principal concern is Somerset Levels and Moors. Within this area various locations are of national and internationally significance for wildlife. Thus the Somerset Levels and Moors are designated as a Special Protection Area (SPA) under the Habitat Regulations 2017 and listed as a RAMSAR Site under the RAMSAR Convention.

Natural England have advised re. the high levels of phosphates in the Somerset Levels and Moors.

In light of a court Judgement (known as Dutch N), Natural England have advised District and County Councils that, in light of the unfavorable condition of the Somerset Levels and Moors RAMSAR Site, before determining a planning application that may give rise to additional phosphates within the catchment, competent authorities should undertake a Habitats Regulations Assessment (HRA).

6.0 Mitigation

In order for the development to demonstrate neutrality, accounting for the increase in on site population. If the development can be shown to produce no more than existing loading, then it will be phosphate neutral.

We propose an adequately sized package treatment plant with iron dosing. This will be adopted by Albion Water. With suitable credit scheme to mitigate against positive budget. Details are included in subsequent chapters.

We have included details of the package treatment plant **Appendix 3**. Performance monitoring and end of life considerations are included in **Appendix 4**.

²

https://ssccust1.spreadsheethosting.com/1/3d/08e177701b0026/Copy%20of%20P%20budget%20Calc_V3.0%20developer%20version%2026.02.2021/Copy%20of%20P%20budget%20Calc_V3.0%20developer%20version%2026.02.2021.htm



6.1 Package Treatment Plant

The package treatment plant is primarily to remove suspended solids, and to provide primary treatment prior to the secondary treatment stage in the filter media. We have not included treatment efficacy for the package treatment plant, as the phosphate removal as calculated to come solely from the filter media as per 6.2. The following models would be acceptable, based on notional occupancy:

• Kingspan BioDic +P

The PTP will require regular desludging, maintenance, monitoring and replenishment of dosing chemicals. These and other measures to ensure scheme runs in perpetuity will be ensure by Albion Water.

6.2 Land Use

There will be an amount of mitigation provided from on-site land use changes including removal of agricultural use, and provision of SUDs areas, open space and woodland. These land use changes are reflected in Phosphate Budget Calculator.

6.2.1 Banking

With regards to wetlands: Studies show a wide variance in removal rates of Phosphates, ranging from 1 to 41 kg/ha/yr. We have observed the flowing references in scientific literature:

- 7.4 kg/ha/yr Reddy & DeBusk, 1987
- 41 kg/ha/yr Karin Johannesson 2008
- 2.6 kg/ha/yr Johnston 1991

We have also made a literature review, and present above banking coefficients. The average value of the above studies is 17 kg/ha/yr, we have added a 100% buffer to this and round down giving banking value of 8kg/ha/year.

6.4 Credits

The remaining balance of **4.30 kg** will be off-set with credits from septic tank upgrades. 7 Septic tanks within the applicant's control will be upgraded, and this should supply the amount of credits required.

7.0 Adopted Drainage Justification

The plan on site is to install a package treatment plant (as specified above) that will then be adopted by Albion Water. This will avoid having connect to "true mains" infrastructure, with all of the associated problems:



Many of the sewerage undertakers such as Southwest Water or Wessex Water are management Sewage Treatment Assets that are decades past their serviceable life span. Not only in terms of the technology they employ, but there capacity, which was designed for 1970's population levels. There are now 17,000,000 million more people living in the UK. More importantly impermeable surfaces drained to foul sewer have also increased.

The majority of Sewage Treatment Works in the UK operate Combined Sewer Overflows (CSOs). This was originally designed to divert very heavy flows around the treatment system, in the case of very heavy rainfall. It is worth noting that Charlton Horethorn STW operated its combined Sewer Overflow for 80³ hours during 2022.

	Raw Discharged River	Sewage from Site to
Existing	1 %	
Proposed	0 %	

Increases in rainfall intensity owing to climate change, and increases in paved areas, coupled with little or no expansion in capacity at Sewage Treatment Works leads to the frequent, and in some case near constant discharge (250 days a year⁴) of raw untreated sewage in to Rivers and Seas. This not only side steps discharge consent limits for phosphates but results in raw sewage with it associated BOD, COD, Coliform Load, entering Rivers and Sea. In addition to this we are now learning about the impact of plastics contained in sewage on Fluvial and Marine ecosystems.

A great many plastics contain Phthalates which are a softening agent commonly used in many flexible plastics. They are an endocrine disruptor and are causing fertility problems in a wide range of Marine and Fluvial organisms. Phalates are environmentally persistent chemicals much like DDT and PCBs. They concentrate up the food chain causing sterility and deformity in higher predators, including humans⁵.

During operation of a Combined Sewer Overflow, all Marco plastics contained in sewage are released to Rivers and Sea: Dental Floss, Condoms, Cotton Buds, Plastic Wrappings, Wet Wipes, Sanitary Towels, Tampons and Tampon Applicators. All end up in the river tangled around low braches or washed up on beaches. Where they degrade in to trillions of micro and Nano plastic particles.

The correct way in which to dispose of the sludge, collected from the treatment plant, filter vessel and reed bed aggregate (in decreasing order of sludge concentration) is an important point. We would recommend that the tankered waste is disposed of at a dewatering plant, where all sludge is recovered, and disposed to landfill.

³ <u>https://corporate.wessexwater.co.uk/our-purpose/rivers-and-coastal-waters/storm-overflows</u>

⁴ <u>https://papp.charity/2022/03/10/welsh-water-sewage-in-rivers/</u>

⁵ https://www.reuters.com/article/us-genital-idUSTRE7230RO20110304



We would therefore recommend that the enforcers involved in the determination support this application for installation of an adoptable PTP.

8.0 Conclusions

The proposal as described above would result in a Phosphate Neutral Development.

9.0 Limitations

For the avoidance of doubt, the parties hereby expressly agree that the Consultant takes no liability for and gives not warranty against actual flood, sewage, nutrient or water damage of The Client's property, or natural environment in relation to the performance of the service.

This report gives estimates of likely flows and occupancy number, but does not accept liability associated for the use of these figures in the construction of sewers or drains. Options appraisals are given as example only. Responsibility for design / services and resulting levels of performance rests with the client and or developer.

This is a planning report and should not be used in any attempt to prescribe value to assets, or to cost for future works. The specifications herein are for guidance only, and no responsibility will be taken for their efficacy or issues surround practical implementation.

This report is produced for the sole use of the Client, and no responsibility of any kind, whether for negligence or otherwise, can be accepted for any Third Party who may rely upon it.

The conclusions and recommendations given in this report are based on our understanding of the future plans for the site.

The scope of this report was discussed and agreed with the Client. No responsibility is accepted for conditions not encountered, which are outside of the agreed scope of work.



APPENDIX 1

Plans







APPENDIX 2

Budget

Stage 1 Calculate Total Phosphorous (TP) in (Kg/year) derived from the development as a result of increased population

Note: This calculation should only include the **additional** units resulting from the proposed development, including any development that will result in overnight accommodation. For land not currently in residential use, this will be the total units proposed by the development. However, for land already in residential use, this should only be the increase in units.

1.	Calculate the additional population	Value	Unit
	Number of units as flats, care- home, residential institution proposed	2	dwellings
	Average occupancy	1.65	persons/dwelling
	Number of houses proposed	29	dwellings
	Average occupancy	2.4	persons/dwelling
	Number of additional rooms		
	above 6 residents (sui generis)		dwellings
	for houses in multiple occupation		
	Average occupancy	1.65	persons/dwelling
	Number of rooms in a hotel or guest house proposed		dwellings
	Average occupancy	1.65	persons/dwelling
	Number of weeks open per year (1-52)		Weeks
	Average occupancy rate (1-100)		%
	Total population increase generated by the development	73	Persons

Note: The national average occupancy rate of 2.4 persons per dwelling is used for in this model. The number of proposed units should be evidenced. In the case of hotel and guest house average occupancy rates should also be evidenced. Developments that do not fall within these classifications such contact the council and bespoke calculations may be used.

Please select how the sewage from the proposed development will be handled, noting that a development must be handled by either wastewater treatment plants or package treatment, and cannot be handled by both.

No 🗸

Is sewage to be handled by wastewater treatment works?

Is sewage to be handled by Package Treatment plants?



Phosphorous Budget Calculator

TP budget th 2a. Wastewater (WwTW) a	nat wou Treatme after tre	ld exit the ent Works atment	TP budget for Package 2b. (PTP	e Treatn s)	nent Plants	
Note: If the sewage is to be treated by wastewater treatment plants then the user should select "Yes" in the list above. If package treatment plants are to be used instead, then the user should select "No" above.			Note: If the sewage is to be treated by package treatment plants then the user should select "Yes" in the list above. If wastewater treatment plants are to be used instead, then the user should select "No" above.			
This is the process of collecting guiding it, via the sewage netwo sewage works). The Phosphoro is calculated by multiplying the r expected water usage per day. concentration within the effluent discharge level of the appropriat loading is expressed in kg/year.	wastewate rk, to Ww7 us concent number of p The Phosp is calculat te WwTW.	r from houses and W (also known as ration of the influent beople by the horous ed by applying the The Phosphorous	Packaged wastewater treatment plants and facilities used to treat wastewater in small individual properties. This concept is defin wastewater treatment. The Phosphorous multiplying the number of people by the e The Phosphorous effluent is calculated by efficiency. The Phosphorous loading is ex	re pre-manu ller commun ned as dece influent is c expected loa y applying th xpressed in t	ifactured treatment ities or on entralized alculated by ding per person. he PTP reduction kg/year.	
Calculate the wastewater volume generated	Value	Unit	Calculate TP load prior to treatment	Value	Unit	
Total population increase generated by the development	0	Persons	Total population increase generated by the development	73	Persons	
Water use per person	110	Litres/person/day	Average Phosphorous loading per person	0.99	Kg/person/year	
Wastewater volume generated by the development	0	Litres/day	Total Phosphorous prior to treatment	72.17	Kg/year	
Confirm receiving WwTW and permit limit	Value	Unit	Calculate TP load after treatment	Value	Unit	
Select the WwTW the development will connect	Ads 🗸		Receiving PTP reduction efficiency	95	%	
WwTW discharge	5.00	mg/L	Total Phosphorous discharge after PTP treatment	3.61	Kg/year	
level Note: Please use the drop down the proposed development will <i>k</i> is not known, then please select list.	n lists to sei pe connecti t 'Unknown	lect the WwTW that ed to. If the WwTW ' from the drop down	Note: The user mist input the reduction en efficiency of the PTP used must be evided include the test result documents from the measured effluent concentrations from re efficiency is unknown then a precautional	fficiency of t nced. The e e lab (in Eng eal world app ry value of 9	he PTP. The vidence should glish) and/ or olications. If the 0% can be used.	
Calculate the TP discharged by the WwTW	Value	Unit	Calculate TP load from development wastewater with on-site PTP	Value	Unit	

TP discharged by WwTW TP discharged by WwTW		0 0.0000	mg/day Kg/day	PTP load	Total Pho	sphorous	3.	.61	Kg/year
Phosphorous Io from WwTW	oading	0.00	Kg/year						
	3.	Calculat populati	te the additio on TP load	nal	Value	Unit			
		Total Pho additiona	osphorous load al population	d from	3.61	Kg/year			

1

Stage 2

Where development sites include existing areas that are to be retained, these areas of lations in both Stages 2 and 3. Itel area of development site Value Total area of development site 3. Identify current land uses of the development site 3. Identify the drainage type of the soil on site Value Is the soil type free draining? Ye e: Identify the soil drainage type from the Viewer, and use the criteria to tify if the soil is either permeable or impermeable Ye Urban development Mineral workings and quarries Open space / Greenfield Allotments and city farms Sports and leisure facilities Transport tracks and ways Transport tracks and ways Transport graming Allotwerte Lowland Grazing / paddock Mixed livestock Poultry Farming	Iue Unit Hectares Iue Unit Iue Unit
Total area of development site Vale Enter the total area of the development site 3. Identify current land uses of the development site Vale Identify the drainage type of the soil on site Vale Is the soil type free draining? Yale It dentify the soil drainage type from the Viewer, and use the criteria to the tify if the soil is either permeable or impermeable Yale Urban development Mineral workings and quarries Open space / Greenfield Allotments and city farms Sports and leisure facilities Transport tracks and ways Transport tracks and ways Transport tracks and ways 3. Cropping Horticulture Pig Farming Lowland Grazing / paddock Mixed livestock Poultry Farming	Iue Unit Hoctares Iue Unit s V able in the Help tab to
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Pig Farming Lowland Grazing / paddock Mixed livestock Poultry Farming	Hectares
Lowland Grazing / paddock Mixed livestock Poultry Farming	Hectares
Mixed livestock Poultry Farming	Hectares
Poultry Farming	
Poultry Farming	Hectares
	Hectares
General Arable	Hectares
Improved grass	Hectares Hectares Hectares Hectares
	Hectares Hectares Hectares Hectares Hectares
Woodland (e.g. coniter, mixed, broad-leaved)	Hectares Hectares Hectares Hectares Hectares Hectares
shrub / heathland / bracken / bog	Hectares Hectares Hectares Hectares Hectares Hectares Hectares
treshwater marsh	Hectares Hectares Hectares Hectares Hectares Hectares Hectares

Sum total of land uses

Note: The sum total of land uses must equal the development site area - the box will colour red if the areas do not match.

3. Calculate TP from current land usage

Unit

Hectares

3.410

Value

.

TP load from current land usage

Stage 3

	3 Calculate IP for the proposed dev	elopment	
Note: Th new weth section. / instead k	is section should include all land uses within the proposed development. Where lands, woodlands, nature reserves, etc. within the development site area, then t Any offsite mitigation, proposed by either the developer or the Council should no be inputted in Stage 5 (if mitigation is required).	e the proposed his should be ir ot be included b	scheme is to create ncluded within this pelow, and should
1.	Total area of development site	Value	Unit
	Total area of the development site	3.410	Hectares
2.	Identify proposed land uses of the development site	Value	Unit
	Urban development	1.570	Hectares
	Open Space / Greenfield	1.210	Hectares
	Woodland	0.520	Hectares
	Nature reserve	_	Hectares
	Heathland / Bog		Hectares
	Allotment		Hectares
	Meadow/semi-natural grassland		Hectares
	Sports and Leisure facilities		Hectares
neip lab.			
3.	Designed Wetlands / SuDS		
3.	Designed Wetlands / SuDS Wetland / SuDS area	0.11	Hectares
3 .	Designed Wetlands / SuDS Wetland / SuDS area Banking coefficient	0.11	Hectares Kg/ha/year
3. Note: Ple justifiable	Designed Wetlands / SuDS Wetland / SuDS area Banking coefficient ease input the banking coefficient calculated for the designed wetland / SuDS. 7	0.11 8 The calculated v	Hectares Kg/ha/year value should be
3. Note: Ple	Designed Wetlands / SuDS Wetland / SuDS area Banking coefficient ease input the banking coefficient calculated for the designed wetland / SuDS. 7 e. Sum total of land uses	0.11 8 The calculated v 3.410	Hectares Kg/ha/year value should be Hectares
3. Note: Ple justifiable	Designed Wetlands / SuDS Wetland / SuDS area Banking coefficient ease input the banking coefficient calculated for the designed wetland / SuDS. 7 s. Sum total of land uses Calculate TP from proposed land usage	0.11 8 The calculated v 3.410 Value	Hectares Kg/ha/year value should be Hectares Unit
3. Note: Ple justifiable	Designed Wetlands / SuDS Wetland / SuDS area Banking coefficient ease input the banking coefficient calculated for the designed wetland / SuDS. 7 s. Sum total of land uses Calculate TP from proposed land usage TP load from proposed land usage	0.11 8 The calculated v 3.410 Value 0.60	Hectares Kg/ha/year value should be Hectares Unit Kg/year
3. Note: Ple justifiable 4. 5.	Designed Wetlands / SuDS Wetland / SuDS area Banking coefficient aase input the banking coefficient calculated for the designed wetland / SuDS. 7 Sum total of land uses Calculate TP from proposed land usage TP load from proposed land usage Calculation of gross P loading	0.11 8 The calculated v 3.410 Value 0.60 Value	Hectares Kg/ha/year /alue should be Hectares Unit Kg/year Unit
3. Note: Ple justifiable 4. 5.	Designed Wetlands / SuDS Wetland / SuDS area Banking coefficient case input the banking coefficient calculated for the designed wetland / SuDS. 7 a. Sum total of land uses Calculate TP from proposed land usage TP load from proposed land usage Calculation of gross P loading Gross TP load from current and proposed land usage	0.11 8 The calculated v 3.410 Value 0.60 Value 3.58	Hectares Kg/ha/year value should be Hectares Unit Kg/year Unit Kg/year

Stage 4

Stage 4 Calculate the net change in Phosphorous load from the proposed development

Note: This stage calculates the net change in total phosphorous load to the catchment from the proposed development. This is derived by calculating the difference between the total phosphorous load calculated for the proposed development (wastewater, urban area, open space etc.) and that for the existing land uses. The phosphorous budget for the site has been calculated under current and AMP7 WwTW permit levels.

		Current	AMP7		Summary No. of dwellings	31
1.	Identify the Phosphorous load from additional population	Value	Value	Unit	PTP efficiency (95
	Phosphorous loading from additional population	3.61	3.61	Kg/year		
2.	Calculate net change in Phosphorous load from land use change	Value	Value	Unit	TP current land use	0.63
	Phosphorous load from land use change	-0.03	-0.03	Kg/year	TP proposed land use	0.60
3.	Calculate phosphorous budget for the development site	Value	Value	Unit		
	Phosphorous budget for the site	3.58	3.58	Kg/year		
4.	Calculate phosphorous budget precautionary buffer	Value	Value	Unit		
	Buffer amount Phosphorous precautionary buffer	20 0.72	20 0.72	% Kg/year		

Note: The figures used throughout this model are based on scientific research, evidence and modelled catchments and represent the best available evidence. However, it is important that a precautionary buffer is used that recognises the uncertainty with these figures and ensures, with reasonable certainty, that there will be no adverse effect on site integrity. As such, a 20% precautionary buffer is built into the calculation.

5.	Total phosphorous budget for the development site	Value	Value	Unit
	Total Phosphorous budget for the site	4.30	4.30	Kg/year

Current WwTW Permit levels

Development will generate additional Phosphorous (Mitigation required) - Please progress

AMP7 WwTW Permit levels

Development will generate additional Phosphorous (Mitigation required) - Please progress



APPENDIX 3

Monitoring

Monitoring Requirements

The phosphate removal in the proposed system is achieved using an Iron Dosing System. The sampling should take place at the final discharge point (outfall to river or pond, or sampling chamber if soak-away). The sample should then be sent to a UKAS accredited laboratory and tested for total Phosphate. We have derived a trigger level, where by if Phosphate rises above the calculated figure below then the filter media will need to be replaced.



Trigger Level is

Maintenance

PTP - The PTP will require desludging at intervals as prescribed by manufacturer. If the high level alarm is activated then a desludge will need to be actioned in the sort term. The PTP will also require an annual inspection, by a suitable contractor to check for fouling of moving parts, and efficacy of pumps and valves.

SUDs - Annual maintenance of the SUDs basin will include trimming of reeds & vegetation. Again inflow and outflow should be compared to check that hydraulic conductivity is remains adequate.



APPENDIX 4

PTP PIA



Certificate

353.02C02

Kingspan Water & Energy Ltd. College Road North, Aston Clinton, Aylesbury, HP22 5EW, UK

EN 12566-3, Annex B Small wastewater treatment systems for up to 50 PT

Small wastewater treatment system BioDisc +P Rotating Biological Contactor (RBC) in a GRP tank with chemical dosing equipment

Test report PIA2019-353B47.02 This test certificate is a revised version of test certificate no. 353.02C01.

Nominal organic daily load (influent)	0.28 kg E	BOD₅/d	
Nominal hydraulic daily load	0.9 m³/d		
Material	GRP		
Treatment efficiency		Efficiency	Effluent
(nominal sequences)	COD	95.9 %	31 mg/l
	BOD ₅	98.0 %	6 mg/l
	N _{tot} *	71.1 %	17.9 mg/l
	NH ₄ -N*	92.1 %	3.0 mg/l
	Ptot	95.4 %	0.3 mg/l
	SS	95.6 %	15 mg/l
Electrical consumption	1.5 kWh/	d	

Electrical consumption

*determined for temperatures \geq 12 " C in the bioreactor

Performance tested by:

PIA - Prüfinstitut für Abwassertechnik GmbH Hergenrather Weg 30 52074 Aachen Germany

This document replaces neither the declaration of performance nor the CE marking.







Sustainable Certif

origin - tested

Martina Wermter

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