

Evening Nick.

Further to the email trail below ending last September I'm unsure what the current situation is regarding the additional bat survey work as required by the County Ecologist. Maybe you could update me and I'll advise the County Ecologist accordingly?

Regarding the phosphates situation, again I'm unsure what further information you may have obtained since our last correspondence on the matter. For your information, the attached guidance note was finalised by Somerset Ecology Services & Natural England yesterday and is now part of the phosphate update that has been put on SSDC's website, along with the Royal Haskoning calculator. The link is below

<https://www.southsomerset.gov.uk/services/planning/somerset-levels-and-phosphates/>

It relates to small discharges to ground defined at 5m<sup>3</sup> / day and the use of Septic tanks / Package Treatment Plants and comes with a number of caveats relating to the size and location of the drainage field, its likelihood of flooding and an overall density of occurrences (1 per 4 Ha or 25 / km<sup>2</sup>)

I accept this is probably not relevant to this current application proposal because there is the side requirement in the NPPG that foul drainage should firstly be direct to the public system:  
*Where a connection to a public sewage treatment plant is not feasible (in terms of cost and/or practicality) a package sewage treatment plant can be considered. This could either be adopted in due course by the sewerage company or owned and operated by a sewerage undertaker appointed under a new appointment or variation. The package sewage treatment plant must comply with the general binding rules, or a permit will be required. A package sewage treatment plant must be used if the treated effluent is being discharged to surface water. Paragraph: 020 Reference ID: 34-020-20140306*

Where this cannot be demonstrated the proposal may fail to secure an EA permit.

It is likely that this solution may work for more isolated sites, agricultural workers dwellings and Class Q's or their alternatives and low level holiday schemes where there is associated land that can accommodate the drainage field requirement and also by reason of their more isolated location triggering the scope to argue that Wessex Water connection is not feasible. Nevertheless I thought it only appropriate to let you know of the website's update so you are aware of the current situation. Should you require any further detailed clarification, it would probably be advisable to contact the County Ecology team directly.

Regards  
Dave

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**From:** David Kenyon  
**Sent:** 28 September 2020 11:03  
**To:** 'Simon Breeze' <SBreeze@somerset.gov.uk>  
**Cc:** 'Nick Day' <nick@repearceproperties.co.uk>  
**Subject:** FW: 20/01761/FUL. Land At The Old Forge, Limington Road, Limington

Simon - thank you for your email.

Nick – I believe Simon's comments are self-explanatory and there is nothing further I can add from the wider "ecological" perspective.

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**From:** Simon Breeze <[SBreeze@somerset.gov.uk](mailto:SBreeze@somerset.gov.uk)>

**Sent:** 25 September 2020 14:34

**To:** David Kenyon <[David.Kenyon@SouthSomerset.Gov.Uk](mailto:David.Kenyon@SouthSomerset.Gov.Uk)>

**Subject:** RE: 20/01761/FUL. Land At The Old Forge, Limington Road, Limington

Hi Dave,

As highlighted within my original response a return visit is required in line with the Chartered Institute of Ecology and Environmental Management guidelines recommending the maximum period of validity for mobile species, such as bats is 12 to 18 months, and three years for any ecology survey (<https://cieem.net/wp-content/uploads/2019/04/Advice-Note.pdf>).

This is guidance SES adhere to rather than 2 years.

Re SLM nutrients- I haven't received a response to my inquiry to NE regarding additional mitigation measures however this is likely to come in the form of the developer having to invest a required amount into wetland habitat creation in an area connected to the STW to offset Phosphorus generate as part of the development. In the first instance the applicant will need to provide figures for phosphate at mg/l that the development will generate and feed into the STW.

Natural England have pointed us towards guidance for Stodmarsh SSSI [https://www.folkestone-hythe.gov.uk/media/2747/ID-1042876-2-MM7-/pdf/ID\\_1042876\\_\(2\)\\_MM7\).pdf?m=637309397591500000](https://www.folkestone-hythe.gov.uk/media/2747/ID-1042876-2-MM7-/pdf/ID_1042876_(2)_MM7).pdf?m=637309397591500000), in lieu of specific guidance for the Somerset Levels and Moors at the moment. This guidance will help in calculating the amount of mitigation habitat/s required to offset the Nutrients generated.

A strategic approach is being developed to enable developers to fund mitigating habitat creation. However, locations and their viability for habitat creation has yet to be determined, as has a scheme for financial contributions per dwelling to this habitat creation. This is likely to take some time and will inevitably lead to delays in determining housing applications, as it has elsewhere, for example in Hampshire where the Solent SAC was affected. Natural England require that the mitigation will need to be identified and secured in order to complete the Habitat Regulations Assessment. A response on this assessment is required from Natural England before a decision can be made on the application. The mitigation will then need to be in place before any dwelling is occupied.

Kind regards

Simon

**Simon Breeze** MCIEEM  
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**From:** David Kenyon <[David.Kenyon@SouthSomerset.Gov.Uk](mailto:David.Kenyon@SouthSomerset.Gov.Uk)>

**Sent:** 18 September 2020 20:00

**To:** 'Nick Day' <[nick@repearceproperties.co.uk](mailto:nick@repearceproperties.co.uk)>; Simon Breeze <[SBreeze@somerset.gov.uk](mailto:SBreeze@somerset.gov.uk)>

**Subject:** FW: 20/01761/FUL. Land At The Old Forge, Limington Road, Limington

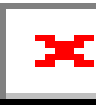
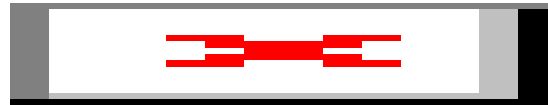
Thank you for your reply Nick.

Simon, can you please provide answers to the questions posed in yellow below? Also, should I now be contacting Natural England directly seeking its formal consultation response to this application or do any comments from Natural England come through you? Thanks

**David Kenyon**  
**Planning Consultant - Development Managerment**  
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**From:** Nick Day <[nick@repearceproperties.co.uk](mailto:nick@repearceproperties.co.uk)>  
**Sent:** 15 September 2020 13:24  
**To:** David Kenyon <[David.Kenyon@SouthSomerset.Gov.Uk](mailto:David.Kenyon@SouthSomerset.Gov.Uk)>  
**Cc:** 'Simon Breeze' <[SBreeze@somerset.gov.uk](mailto:SBreeze@somerset.gov.uk)>  
**Subject:** 20/01761/FUL. Land At The Old Forge, Limington Road, Limington

Good afternoon both,

**Re: 20/01761/FUL. Land At The Old Forge, Limington Road, Limington**

Thanks David for forwarding Simon's recent comments regarding our application.

On the first matter, unfortunately our Ecologist (Louise Lowans) is currently unavailable until the 24<sup>th</sup> of this month, so I am unable to seek her thoughts. However, before resubmitting our application, I consulted with Louise via email to establish that her report was still acceptable and she confirmed that it was okay for 2 years. I have attached a copy of that email for your information.

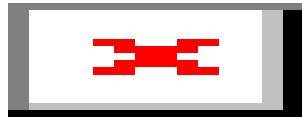
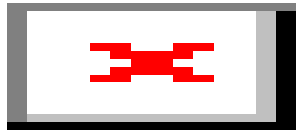
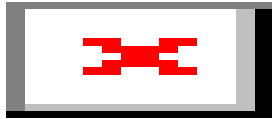
**Simon, are you happy to accept this based on Louise's advice to us?**

If however, you feel an updated mobile species report is required, is it something that could be conditioned for pre-commencement? I am concerned that with Louise currently away that once the lead-in time, time to write up and consultation period have all been factored in that we could be looking at quite a prolonged extension to our application. Which would be disappointing given I did seek professional advice on this matter in advance.

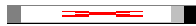
On the second matter, I have to admit I lack any direct experience and therefore, will need to be guided, if possible towards the best solution. I have made an initial enquiry to Wessex Water, as our foul sewage will be connected to their mains system. I have received the below response but am left unsure if this resolves the matter or in fact requires us (as the applicant) to undertake further work? **Simon, can you please let me know where these comments leave us and what action may or may not need to be taken from here?**

Kind Regards,

**Nick Day**  
*Architectural Designer*



**R. E. Pearce Properties Ltd., South Western Business Park, Sherborne, Dorset. DT9 3PS**



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**From:** Alison Kurobasa <[Alison.Kurobasa@wessexwater.co.uk](mailto:Alison.Kurobasa@wessexwater.co.uk)>

**Sent:** 15 September 2020 12:37

**To:** Nick Day <[nick@repearceproperties.co.uk](mailto:nick@repearceproperties.co.uk)>

**Subject:** Phosphates Enquiry for development in Limington, Ilchester, BA22 8EH

Hello Nick

9 new dwellings in Limington, Ilchester, BA22 8EH

The settlement at Limington is in the catchment for the Chilton Cantelo Water Recycling Centre at Hornsey Bridge which outfalls within the Somerset Yeo and River Parret catchment.

We acknowledge your query and advise that Wessex Water is seeking a meeting with the Local Planning Authority (LPA) on how they should be approaching this issue. In the meantime our Director of Catchments and Environmental can advise the following:

Wessex Water is aware that earlier this year Natural England (NE)'s approach to the Somerset Levels and Moors changed following a legal case in Holland relating to development and nutrient levels in designated sites (Dutch Nitrogen Case). As a result, we understand NE now require a Habitats Regulations Assessment

We hope to meet with the planning authority shortly to agree how this issue will be tackled by all the relevant authorities. You may be aware that discharges from Water Recycling Centres (WRC) accounts for just a proportion of phosphorous in the environment.

The change in advice from NE is subsequent to Wessex Water's Final Business Plan Determination from our regulator Ofwat, which was accepted by the Wessex Water Board in January 2020. The Business Plan and investment period runs between 2020-2025 (AMP7). Therefore, our investment plans remain the same within the Somerset Levels and Moors, as agreed with both NE and the Environment Agency (EA), and in accordance with the Water Industry National Environmental Program (WINEP) requirements.

**Development as described in your communication, where connected to the public sewer network, will drain to our Water Recycling centre (WRC) at CHILTON CANTELO Hornsey Bridge**

**During AMP7, we have no investment plans at CHILTON CANTELO Hornsey Bridge WRC related to phosphorus removal.**

Wessex Water's approach to phosphorus reduction in the Somerset catchments has been described in our Business Plan, specifically advocating a Catchment Nutrient Balancing Approach within the Tone and Parrett sub catchments. This approach has been accepted by our environmental regulators (EA and NE) and funded by Ofwat within our Final Determination, more details can be found here:<https://www.wessexwater.co.uk/corporate/strategy-and-reports/business-plan-2020>.

Due to the amount of sudden queries to Wessex Water generated by this issue we will not be able to enter into further direct correspondence. We trust the above information clarifies Wessex Water's position and will satisfy your requirements.

Regards

**ALISON KUROBASA**  
**PLANNING LIAISON**  
**Wessex Water**  
Claverton Down Bath BA2 7WW  
[wessexwater.co.uk](https://www.wessexwater.co.uk)

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