

From: Stefan Stojsavljevic <stefan@deltaplanning.co.uk>
Sent: 26 April 2021 11:15
To: Carlisle, Heather <Heather.Carlisle@herefordshire.gov.uk>
Cc: David Green <david@deltaplanning.co.uk>
Subject: RE: 210574 Consultation Responses case officer update ecology 26/4 - HRA

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Hi Heather,

Further to the below, please find attached the original impact assessment and letter from Welsh Water for you to take in to consideration. This confirms that there is capacity to accept the flow from the site. As demonstrated by this, we are connected to the mains and therefore as far as the site and planning application is concerned, we do not think we are affected by the moratorium.

We hope the attached helps you in considering this issue.

Kind Regards,

Stefan Stojsavljevic
Assistant Planner
Delta Planning

M: 07437739260
E: stefan@deltaplanning.co.uk



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From: Stefan Stojsavljevic
Sent: 26 April 2021 09:48
To: 'Carlisle, Heather' <Heather.Carlisle@herefordshire.gov.uk>
Cc: David Green <david@deltaplanning.co.uk>
Subject: RE: 210574 Consultation Responses case officer update ecology 26/4 - HRA

Hi Heather,

That's great, thank you, I look forward to hearing back from you shortly.

Kind Regards,

Stefan Stojsavljevic
Assistant Planner
Delta Planning

M: 07437739260
E: stefan@deltaplanning.co.uk



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From: Carlisle, Heather <Heather.Carlisle@herefordshire.gov.uk>
Sent: 26 April 2021 09:37
To: Stefan Stojsavljevic <stefan@deltaplanning.co.uk>
Cc: David Green <david@deltaplanning.co.uk>
Subject: RE: 210574 Consultation Responses case officer update ecology 26/4 - HRA

Thank you Stefan for your email and background information. I will discuss/liase with my ecology team and trust they will be pragmatic and agree this RM to move forward. Thank you for confirming the foul water will go to the main sewer to the treatment plant.

I will be in touch again shortly.
Kind regards
Heather

From: Stefan Stojsavljevic <stefan@deltaplanning.co.uk>
Sent: 23 April 2021 17:24
To: Carlisle, Heather <Heather.Carlisle@herefordshire.gov.uk>
Cc: David Green <david@deltaplanning.co.uk>
Subject: RE: 210574 Consultation Responses case officer update ecology 22/4 - HRA

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Hi Heather,

I hope you are well and thanks for your voicemail and subsequent email.

We have discussed with our ecologist and we feel that in our case we should not be held up by the moratorium. This site has outline approval which was originally granted in 2014 and at that stage the issue of the Appropriate Assessment was considered at the time it was granted. Welsh Water confirmed at planning stage that the foul water could all go via the main sewer to the treatment plant.

I attach to assist the consultation responses on the original outline application from the various water authorities, as well as the committee report which states at Para 4.3 on Page 5 that Natural England considered it was not necessary to undertake an Appropriate Assessment on the implications of the proposal.

Kind Regards,

Stefan Stojsavljevic
Assistant Planner
Delta Planning

M: 07437739260
E: stefan@deltaplanning.co.uk



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From: Carlisle, Heather <Heather.Carlisle@herefordshire.gov.uk>
Sent: 22 April 2021 11:45
To: Stefan Stojsavljevic <stefan@deltaplanning.co.uk>
Subject: RE: 210574 Consultation Responses case officer update ecology 22/4 - HRA

Good morning Stefan,

I have just left you a voicemail, however I can confirm I have not had any comments back from my ecology colleagues, and they unfortunately currently do have a considerable backlog in consultee responses to work through.

Also, the application site lies within the catchment of the River Lugg SAC (Lugg-Back Brook/Upper Arrow), which comprises part of the River Wye Special Area of Conservation (SAC); a habitat recognised under The Conservation of Habitats and Species Regulations 2017, as amended by the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019' (the 'Habitats Regulations') as being of international importance for its aquatic flora and fauna and at present the levels of phosphates in the River Lugg SAC catchment area exceed the water quality objectives and it is therefore in unfavourable condition. As such there is a moratorium on development within the River Lugg catchment: Please see link below for more details
https://www.herefordshire.gov.uk/downloads/download/2039/development_in_the_river_lugg_catchment

However, officers are expecting a revised/updated position statement to be issued in the next few weeks on this matter.

Due to the date of the Outline and subsequent variations and as explained on my voicemail there does not appear to be an appropriate assessment (AA)/Habitats Regulations Assessment (HRA) ever been undertaken and assessed by Natural England for this site. As such I am of the opinion an 'AA' will need to be undertaken by ecology colleagues and then sent on to Natural England.

I have asked for anticipated timescales for comments from the ecology team to help feed into the determination process and will update you shortly.

Kind regards,
Heather

From: Stefan Stojsavljevic <stefan@deltaplanning.co.uk>
Sent: 22 April 2021 10:47
To: Carlisle, Heather <Heather.Carlisle@herefordshire.gov.uk>
Cc: David Green <david@deltaplanning.co.uk>
Subject: RE: 210574 Consultation Responses case officer holding reply 9/4

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Hi Heather,

Thanks for the update on Friday, I was wondering whether Ecology have provided their comments yet?

Kind Regards,

Stefan Stojsavljevic
Assistant Planner
Delta Planning

M: 07437739260
E: stefan@deltaplanning.co.uk



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From: Stefan Stojsavljevic
Sent: 09 April 2021 16:07
To: 'Carlisle, Heather' <Heather.Carlisle@herefordshire.gov.uk>
Cc: David Green <david@deltaplanning.co.uk>
Subject: RE: 210574 Consultation Responses case officer holding reply 9/4

Hi Heather,

Thanks for the update, this is helpful.

I look forward to receiving your thoughts once you have reviewed the application next week.

Kind Regards,

Stefan Stojsavljevic
Assistant Planner
Delta Planning

M: 07437739260
E: stefan@deltaplanning.co.uk



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From: Carlisle, Heather <Heather.Carlisle@herefordshire.gov.uk>
Sent: 09 April 2021 15:49
To: Stefan Stojsavljevic <stefan@deltaplanning.co.uk>
Subject: RE: 210574 Consultation Responses case officer holding reply 9/4
Importance: Low

Good afternoon Stefan

I am not aware of any new correspondence submitted to me direct on this application. I have allocated time next week to review this application in more detail, so I will update you accordingly. However, please be advised I have not made contact with the ward councillor in regards to either my recommendation and seeking their acceptance on determination route.
Kind regards
Heather

From: Stefan Stojsavljevic <stefan@deltaplanning.co.uk>
Sent: 09 April 2021 10:45
To: Carlisle, Heather <Heather.Carlisle@herefordshire.gov.uk>
Cc: David Green <david@deltaplanning.co.uk>
Subject: RE: 210574 Consultation Responses

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Hi Heather,

I hope you are well and had a lovely break over Easter.

I was wondering if you have received any final consultation responses and any other updates for us with regards to any discussions with the parish/ward councillor?

Kind Regards,

Stefan Stojsavljevic
Assistant Planner
Delta Planning

M: 07437739260
E: stefan@deltaplanning.co.uk



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From: Stefan Stojsavljevic
Sent: 29 March 2021 09:11
To: 'Carlisle, Heather' <Heather.Carlisle@herefordshire.gov.uk>
Cc: David Green <david@deltaplanning.co.uk>
Subject: RE: 210574 Consultation Responses case officer update 28/3

Hi Heather,

Thanks for the update, this is really helpful.

I look forward to receiving your comments next week.

Kind Regards,

Stefan Stojsavljevic
Assistant Planner
Delta Planning

M: 07437739260
E: stefan@deltaplanning.co.uk



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From: Carlisle, Heather <Heather.Carlisle@herefordshire.gov.uk>
Sent: 28 March 2021 10:38

To: Stefan Stojsavljevic <stefan@deltaplanning.co.uk>
Subject: 210574 Consultation Responses case officer update 28/3

Good morning Stefan,
Moreton Business Park
210574

Apologies for the slight delay in coming back to you.

As an update in regards to consultation responses, I can confirm the following:

Now published:

- Landscape comments
- Land drainage comments
- EHO – Contaminated land comments
- Highways England comments

For some reason the Local Highway Authority comments are not appearing on line, so I have sent them to my scanning team to be published but for ease I have attached.

I have had not had any comments from the Parish or the ward councillor, although please be aware it is my duty to agree the route for determination for the application with the ward councillor once I am in the position to confirm my recommendation and consultee response.

For your information I am on leave this week, so once I return from leave I would like to think I will be in position to advise of any outstanding consultee replies primarily ecology.

Kind regards,
Heather

From: Stefan Stojsavljevic <stefan@deltaplanning.co.uk>
Sent: 23 March 2021 17:13
To: Carlisle, Heather <Heather.Carlisle@herefordshire.gov.uk>
Cc: David Green <david@deltaplanning.co.uk>
Subject: RE: Reserved Matters Application for Zone B, The Glide, Moreton Business Park (Ref: 210574) Consultation Responses

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Hi Heather,

Thanks for the update, I look forward to receiving your comments then.

Kind Regards

Stefan Stojsavljevic
Assistant Planner
Delta Planning

M: 07437739260
E: stefan@deltaplanning.co.uk



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From: Carlisle, Heather <Heather.Carlisle@herefordshire.gov.uk>
Sent: 23 March 2021 17:11
To: Stefan Stojsavljevic <stefan@deltaplanning.co.uk>
Subject: RE: Reserved Matters Application for Zone B, The Glide, Moreton Business Park (Ref: 210574) Consultation Responses

Good evening Stefan,

Please accept this email as receipt of your email below. I will come back to as soon after I have reviewed the application, but it will likely to be the end of the week.

Kind regards,
Heather

From: Stefan Stojsavljevic <stefan@deltaplanning.co.uk>
Sent: 23 March 2021 11:04
To: Carlisle, Heather <Heather.Carlisle@herefordshire.gov.uk>
Cc: David Green <david@deltaplanning.co.uk>
Subject: RE: Reserved Matters Application for Zone B, The Glide, Moreton Business Park (Ref: 210574) Consultation Responses

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Hi Heather,

I hope you are well.

I note that the consultation deadline has now passed (19th March) in relation to the above application and I was wondering if there are any more responses we are yet to see other than the three that are available online (drainage, Highways England, EHO)?

Kind Regards,

Stefan Stojsavljevic
Assistant Planner
Delta Planning

M: 07437739260
E: stefan@deltaplanning.co.uk



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From: Stefan Stojsavljevic
Sent: 02 March 2021 09:10
To: 'Carlisle, Heather' <Heather.Carlisle@herefordshire.gov.uk>
Cc: David Green <david@deltaplanning.co.uk>
Subject: RE: Reserved Matters Application for Zone B, The Glide, Moreton Business Park (Ref: 210574) Revised Proposed Site Layout Plan

Hi Heather,

Apologies as we have another minor revision to make, please find attached the revised proposed site layout plan. The purpose of this revision is to retain the access road at the rear of Unit G and in order to facilitate this, we have slightly amended the car parking layout for the proposed Units H and J. We are also proposing to implement some EV charging points as well, which is also shown on the attached plan.

Could this drawing therefore be uploaded online to replace Rev 101A please?

Kind Regards,

Stefan Stojsavljevic
Assistant Planner
Delta Planning

M: 07437739260
E: stefan@deltaplanning.co.uk



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From: Stefan Stojsavljevic
Sent: 23 February 2021 09:17
To: 'Carlisle, Heather' <Heather.Carlisle@herefordshire.gov.uk>
Subject: RE: Reserved Matters Application for Zone B, The Glide, Moreton Business Park (Ref: 210574) case officer reply 22/2

Hi Heather,

That's great, thank you. Yes, I appreciate it is difficult to get to the office and out on site given the current restrictions, however, thanks for letting me know that the site notices are due to be posted by the end of this week.

Kind Regards,

Stefan Stojsavljevic
Assistant Planner
Delta Planning

M: 07437739260

E: stefan@deltaplanning.co.uk



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From: Carlisle, Heather <Heather.Carlisle@herefordshire.gov.uk>

Sent: 22 February 2021 18:21

To: Stefan Stojsavljevic <stefan@deltaplanning.co.uk>

Subject: RE: Reserved Matters Application for Zone B, The Glide, Moreton Business Park (Ref: 210574) case officer reply 22/2

Good evening Stefan

Thank you for your email, I have asked the question to my scanning team why it has not been published. For your information I aim to put up the site notices at the end of this week, I am sure you can appreciate due to managing and limiting my travel movements I only go into the office once a week to print off site notices. The website will be updated to reflect this once they are up.

Kind regards,
Heather

From: Stefan Stojsavljevic <stefan@deltaplanning.co.uk>

Sent: 22 February 2021 14:11

To: Carlisle, Heather <Heather.Carlisle@herefordshire.gov.uk>

Cc: David Green <david@deltaplanning.co.uk>

Subject: RE: Reserved Matters Application for Zone B, The Glide, Moreton Business Park (Ref: 210574)

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Hi Heather,

I noticed that the attached covering letter which was originally submitted via the Portal has not been uploaded online, could this be added as well please?

Kind Regards,

Stefan Stojsavljevic
Assistant Planner
Delta Planning

M: 07437739260
E: stefan@deltaplanning.co.uk



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From: Stefan Stojsavljevic
Sent: 19 February 2021 10:44
To: 'heather.carlisle@herefordshire.gov.uk' <heather.carlisle@herefordshire.gov.uk>
Cc: David Green <david@deltaplanning.co.uk>
Subject: Reserved Matters Application for Zone B, The Glide, Moreton Business Park (Ref: 210574)

Dear Heather,

I understand our application at Moreton Business Park, Moreton on Lugg (application reference: 210574) for the reserved matters for appearance, landscaping, layout and scale of a building for B1c/B2 use on Zone B, The Glide has been allocated to you.

May you please find attached a revised existing site plan which incorporates the existing trees on the site, which were inadvertently left off the original drawing, could you please supersede the original drawing for the attached. Furthermore, I have also attached a landscape plan to accompany the application and as requested by the Council within the validation letter, the climate change compliance checklist. It is not considered necessary for us to complete the biodiversity ecology compliance checklist as these matters have already been addressed as part of the outline approval which were conditioned, the ecology conditions were then subsequently discharged, please see the attached discharge of condition decision notice.

Please let me know if you have any queries or require any additional information.

Kind Regards,

Stefan Stojisavljevic
Assistant Planner
Delta Planning

M: 07437739260
E: stefan@deltaplanning.co.uk



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Dŵr Cymru
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Great West 2003 Ltd
Moreton Business Park
Moreton on Lugg
Hereford
HR4 8DS

Your ref

Our ref
DS/CP/HFD/40/SE148

Enquiries Clare Powell

Direct Line 0800 917 2652

18th December 2012

For the Attention of A B Horner

Dear Sir

Re: Feasibility Study at Moreton on Lugg Waste water Treatment Works.

Thank you for your letter received on 20th August 2012 and subsequent emails, we would like to provide the following in response:

We are pleased to enclose our report on the feasibility study that has been carried out at Moreton on Lugg Waste water Treatment Works (WwTW's). As you will see from the conclusion that Moreton on Lugg WwTW's has the capacity to accept the additional flows that will be generated by the new development.

We have also been consulted on the planning consultation for the proposed development at Moreton on Lugg by the Local Planning Authority and can confirm that we will be providing supportive comments in our consultation response.

We hope the above is satisfactory, however should you require any further information your proposals please do not hesitate to contact us.

Yours faithfully


Clare Powell
Developer Services

glas
Glas Cymru Cyfyngedig

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We welcome correspondence in
Welsh and English.

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Fydym yn croesawu gohebiaeth yn y
Gymraeg neu yn Saesneg.

Dŵr Cymru Cyl, cwmni cyfyngedig wedi'i gofrestru yng
Nghymru rhif 2366777. Swyddfa gofrestrdig: Heol Pentwyn,
Nelson, Treharris, Morgannwg Ganol CF46 6LY.



Dŵr Cymru
Welsh Water

DŴR CYMRU WELSH WATER

Developer Impact Assessment

18th December 2012

Moreton on Lugg WwTW
Document ID: P2136/20.3.1/003

| CONTROL SHEET | | | | | |
|----------------------------------|-----------------|---|--|---|--|
| Project Title | | Moreton on Lugg WwTW Developer Impact Assessment | | | |
| Project Code (Process) | | P2136 Moreton on Lugg | | | |
| Project Code (Civils) | | N/A | | | |
| Unique ID | | N/A | | | |
| DCWW SAP Project Code | | DCWW.A917.S.459.091 | | | |
| Document Reference Number | | P2136/20.3.1/003 | | | |
| Rev | Date | Description Purpose | Prepared | Checked | Approved |
| 0 | 18/12/12 | First Issue | Process Engineer – S Jones/A.Jacobs | Process Manager – A Burgoyne | Project Manager – B Cook |
| | | | | | |
| | | | | | |

EXECUTIVE SUMMARY

A study has been carried out to assess the impact of development at Moreton on Lugg Business Park on the waste water treatment works that would receive the waste water from the Park. This site is Dŵr Cymru Welsh Water's Moreton on Lugg WwTW.

The Business Park has a small number of occupants at present but it is proposed to increase these by a 1000 extra commercial occupants. The foul flow from the Business Park is collected in a pumping chamber from where it is pumped into the main sewer that discharges into Moreton on Lugg WwTW. It has been estimated by the developer's representative that the instantaneous volume requirement will not change but the length of pumping will increase.

The PE associated with the Development is 278 PE. There is a projected residential growth (to 2030) of 527 PE, though this has not been included in this assessment.

Review of the current compliance of the work's effluent with respect to the consent show that the works is within its consent for both flow and sanitary determinands and, using serviceability indicators, projected to remain within that consent. The main process units are also within the key parameters of the Dŵr Cymru Welsh Water (DCWW) technical specifications.

Projecting the current average 80%ile exceedance flows forward to include the additional PE, have shown that with the additional population the Dry Weather Flow (DWF) is not expected to exceed the consented DWF.

Since the DWF and the instantaneous flow are not expected to increase a change in the consented sanitary determinand conditions is not anticipated.

Periphery equipment on site such as the dosing system, screen and sludge handling would need to be checked, and the assumptions made confirmed. However, based on the information available the desktop study undertaken suggests that works should be able to manage the additional load without major intervention to the works, and no modification in the consent would be required.

| | |
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1. INTRODUCTION

Imtech Process Ltd. (IPL) has been instructed by Dŵr Cymru Welsh Water (DCWW) to undertake a Developer Impact Assessment (DIA) in respect of the potential impact on Moreton on Lugg wastewater treatment works (WwTW) of proposed further development at Moreton on Lugg Business Park.

2. BACKGROUND

2.1 PROPOSED DEVELOPMENT

Information received from Developer Services (letter dated 2nd July 2012, received from Clare Powell) requires this study to consider the possible impact on Moreton on Lugg WwTW of the additional flow and load created by further development at Moreton Business Park.

The Business Park has a small number of occupants at present but it is proposed to increase these by a 1000 extra commercial occupants. The foul flow from the Business Park is collected in a pumping chamber from where it is pumped into the main sewer that discharges into Moreton on Lugg WwTW. It has been estimated by the developer's representative that the instantaneous volume requirement will not change but the length of pumping will increase.

As with the current Development, it has been assumed that foul flows only will be connected to the WwTW and that the development will have a separate surface water system.

2.2 MORETON ON LUGG WWTW

The works accommodates flow from the villages of Moreton, Marden, Sutton St. Nicholas and Wellington.

The existing process stream comprises;

- Pumped flow to the Inlet works with storm weir, grit trap and mechanical screen
- Ferric Sulphate dosing
- 2no. square Primary Settlement Tanks (PST)
- 2no. conventional Trickling filters with mineral medium
- 2no. square Final Settlement Tanks and 2no. radial flow tanks(FST)
- Storm tank
- Sludge storage tank

The Environment Agency (EA) consented parameters for the works discharge are:

Consent No. AH1002201 (continuous discharge)

| | |
|---------------------------------|------------------------|
| Dry Weather Flow | 665 m ³ /d |
| Biochemical Oxygen Demand (BOD) | 20 mg/l 95%ile |
| Total Suspended Solids (TSS) | 30 mg/l 95%ile |
| Ammoniacal Nitrogen (Amm) | 15 mg/l 95%ile |
| Total Phosphorus (TP) | 1mg/l (annual average) |
| Total Iron | 5mg/l |

Consent AN0357101 (intermittent discharge)

Storm Weir setting. 28 l/s
 Storm Tank volume 157 m³

There have been concerns raised about the P load from the WwTW into the watercourse. Therefore the critical factor is whether the Development will alter the DWF of the WwTW as the DWF is used to calculate the load impact of the discharge.

3. POPULATION EQUIVALENT (PE)

3.1 CURRENT POPULATION IDENTIFICATION.

The current load accommodated by the works, expressed as population equivalent (PE), can be assessed by the methods below.

3.1.1 DCWW DATA (SAP DATABASE)

SAP information is summarised in Table 1.

Table 1: SAP Data for Moreton on Lugg WwTW

| Resident Population | Non-Resident Population | PE Trade Effluent | PE Metered com. | PE Tankered Waste | PE Sludge Load | Total Population Equivalent |
|---------------------|-------------------------|-------------------|-----------------|-------------------|----------------|-----------------------------|
| 3258 | 60 | 0 | 57 | 0 | 0 | 3375 |

3.1.2 HOUSE COUNT

DCWW boundary data with a count of seeded dwellings showed the total number of properties as 1397 according to GIS. Applying a standard occupancy of 2.25 (PR006 v4) produces a design estimate of 3143 PE. Adding the non-residential and Metered Commercial PE, gives a PE of 3260 PE.

3.2 CURRENT PE SUMMARY

For the purpose of this assessment the current Domestic PE is determined as 3375 as determined by SAP.

3.3 FUTURE PE

The future population equivalent has been estimated using the information supplied by the developer regarding the industrial park. The business users have been converted to a population equivalent based on the DCWW per capita flow information.

- 278 PE from Industrial Park.

Therefore, for the purpose of this assessment the future total PE is determined as 3653 PE. This represents an increase in PE of 8%.

4. DEVELOPMENT FLOW AND LOAD

4.1 FLOW

Using DCWW standard per capita daily flows the additional Dry Weather Flow (DWF), calculated to be delivered to the site, would be 48.3 m³/d.

If the current site flow data MCert 80%ile exceedance flows are projected forward for the increased population the DWF increase attributable would be 41.6 m³/d.

4.2 LOAD

The increase in population would increase the load arriving at the works for treatment. Again, using DCWW standard per capita loadings, the additional BOD load has been estimated as be 16.7 kg/d, the Total Suspended Solids (TSS) is calculated as be 19.5 kg/d, the Ammonia is estimated as 2.09 kg/d and the Total Phosphorus is expected to increase by 0.695 kg/d.

5. WORKS PERFORMANCE

5.1 CURRENT CONSENT COMPLIANCE

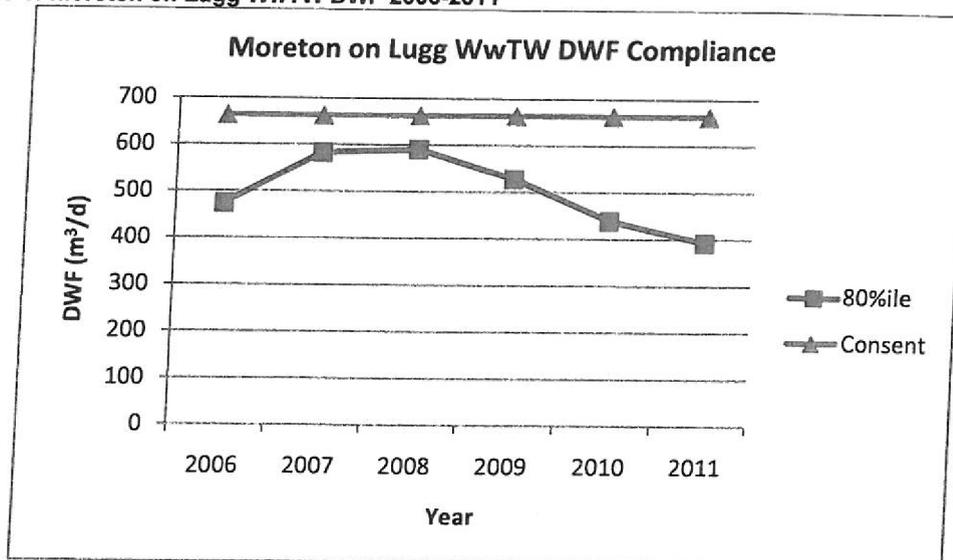
Compliance with the WwTW consented parameters is assessed by reviewing MCerts flow data records and by carrying out sub-threshold analysis of final effluent quality data recorded over the previous 3 years period.

5.1.1 FLOW

The assessed parameter for flow is the 80%ile exceedance. Compliance is assessed against the consented DWF.

The consented DWF is 665m³/d. For the past 6years (2006-2011) the site has been in compliance, with the site measured 80%ile exceedance being below the consent. The average 80%ile was 504.7 m³/d. The annual values are illustrated in Figure 1 below.

Figure 1: Moreton on Lugg WwTW DWF 2006-2011



5.1.2 QUALITY PERFORMANCE

Using the OFWAT serviceability indicators the current compliance risk has been assessed using the information available on the DCWW reporting systems. The relevant determinants are BOD, TSS, and Amm-N. Sub-threshold analysis of 3 years' previous data provides results as shown in Table 2, which predict the probability of a failure occurring in the following year.

Table 2: Moreton on Lugg WwTW Serviceability Results.

| Event | Distribution characterisation of m/c | Probability of Event During Y+1 | | |
|-------------|--------------------------------------|---------------------------------|-----|---------|
| | | BOD | TSS | Ammonia |
| Cat A Event | maximum value >2.0 | 0% | 0% | 0% |
| Cat B Event | 95%ile (normal) >1.0 | 0% | 0% | 0% |
| Cat C Event | mean value >0.5 | 0% | 63% | 28% |

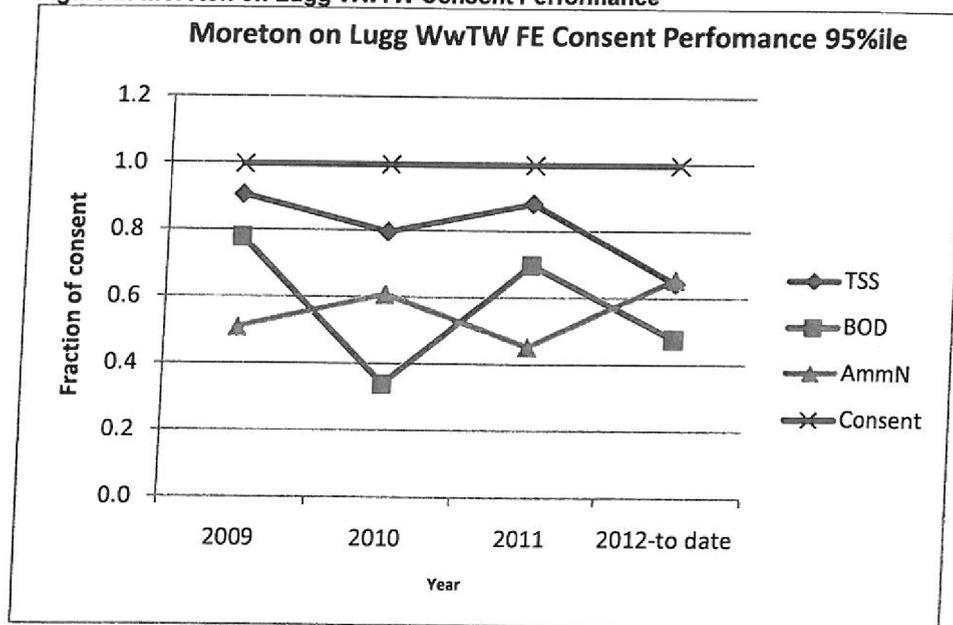
Note: 'm' is a statistical determinant and 'c' is the prevailing consent for that determinant

Table 2 shows that the works performance is predicted to be good, complying with both its 95%ile and upper tier requirements.

There is a risk that the mean results for total suspended solids and ammonia will exceed 50% of the consent, but these are not compliance issues, they are an indicator for long term reporting and review

Analysis of the annual data shows an acceptable performance of the works, with it remaining within its consent values in recent years. This can be seen in Figure 2 below.

Figure 2: Moreton on Lugg WwTW Consent Performance



Total P is reported as an annual average. Table 3 shows the results since the ferric dosing was installed at the WwTW. The works has been in compliance since the

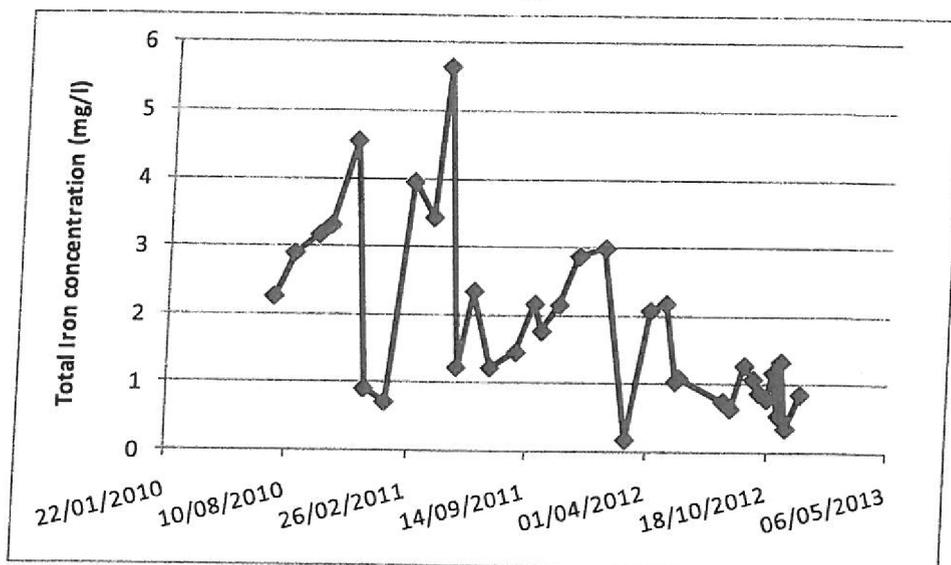
condition has been applied to the consent, though 2010 and 2011 were very close to breaching the discharge limit. The ferric dosing has been optimised in 2012, which has resulted in much better P removal performance.

Table 3: Total P results (annual average of 24 hr composite samples) at Moreton on Lugg WwTW

| Year | Annual average (mg/l) |
|---------|-----------------------|
| Consent | 1.000 |
| 2010 | 0.986 |
| 2011 | 0.933 |
| 2012 | 0.572 |

There has been one Total Iron non compliant result in April 2011 which necessitated the ferric dosing optimisation. Figure 3 shows the Total Iron results which demonstrate that the WwTW performance has continued to improve and shows that currently there is no issue with managing the ferric sulphate dosing.

Figure 3: Total Iron results at Moreton on Lugg WwTW



6. CURRENT WORKS CAPACITY

The main process units at the works have been assessed for their compliance with the DCWW specifications considering the current population equivalent, and assuming that iron dosing is in operation.

All of the main units, the primary tanks, biological filters, and final settlement tanks have been assessed as being within the DCWW technical specifications for the key parameters (e.g. hydraulic loading, BOD loading).

7. EFFECT OF DEVELOPMENT AND GROWTH ON WWTW.

The effect of the additional population has been assessed to establish if the increase in flow is likely to require a modification to the consent conditions and if the main process units are within DCWW specification loadings etc.. This has been a desktop exercise and a number of assumptions have been made. These are included below.

7.1 EFFECT OF DEVELOPMENT AND GROWTH ON FLOW.

As described above, the DWF for a works can be identified by either a calculation, based on the PE, infiltration and industrial loading, or by considering the 80%ile exceedance of the site flows.

Compliance monitoring shows there is currently DWF headroom, so it is considered that the projection of the 80%ile is a better representation of the predicted flows. In this case there is not expected to be any modification of the consent required.

As there is no change in DWF due to the Development, then there is no additional impact of the P load from the WwTW onto the watercourse.

For the Industrial Park it has been estimated by the developer's representative that the instantaneous volume requirement will not change but the length of pumping will increase. All flows to the works are pumped and it is assumed that this is the case for growth in the catchment too. This means that the peak instantaneous flow to the work is expected to remain the same.

7.2 EFFECT OF DEVELOPMENT AND GROWTH ON PROCESS UNITS

The key parameters of the process units have been assessed based on the increased load and flows as discussed above. Considering the DCWW technical specifications, and assuming there is no change in the consent, the primary tanks, biological filters, and settlement tanks are of sufficient capacity to treat the additional load. There will be a need to increase the ferric dose slightly and the existing ferric dosing system is able to achieve this.

7.3 EFFECT OF DEVELOPMENT AND GROWTH ON COMPLIANCE

The works is currently in compliance, and the process units will be within the DCWW technical specifications with the additional flow and load. Therefore, it is predicted that compliance will be maintained following the introduction of the additional PE.

8. CONCLUSION AND RECOMENTATIONS

It is concluded that providing all the assumptions are met Moreton on Lugg WwTW has the capacity to accept the additional flows and loads contributed by the additional business users.

There is no requirement to change the DWF and therefore discharge consent conditions will remain as they are.

The site does not currently have tertiary treatment. It is only required when the total iron consent is less than 2 mg/l, but should be considered on a site by site basis for nitrifying sites. With the increased load it may provide additional confidence to install a process such as a nitrifying sand filter to increase the robustness of the process.



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For the Attention of David Payne

15th January 2013

Dear Sir

Re: Moreton on Lugg Waste water Treatment Works.

Thank you for your email received on 19th December 2012 and subsequent emails, we would like to provide the following in response:

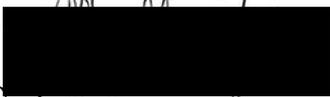
As confirmed in the Developer Impact Assessment Document ID: P2136/20.3.1/003, Moreton on Lugg WwTW's has the capacity to accept the additional flow and load that will be generated by the new development.

As there is no requirement to change the Dry Weather Flow (DWF), discharge consent conditions will remain the same and there will be no additional impact of the P load from the works on to the watercourse.

In light of this we have not raised an objection to the planning consultation from Herefordshire Council and we would be willing to provide the necessary support. We feel that this is now a matter that needs to be resolved by the Environment Agency and Natural England.

We hope the above is satisfactory, however should you require any further information your proposals please do not hesitate to contact us.

Yours faithfully /


Clare Powell
Developer Services

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Glas Cymru Cyfyngedig

We welcome correspondence in
Welsh and English.

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