

MEMORANDUM

Application Ref. PL/2025/02647 Wilcot Road, Pewsey.

Mitigation strategy - 29th May 2025

Mitigation Strategy

Mitigation at the site will be achieved through the upgrade of a septic tanks. Data will be provided to confirm the location of the tanks, the specific site details that determine their eligibility for this purpose. The legal agreements (Unilateral Undertakings) and installation of the new PTP's being secured through a Grampian Condition, which we understand is acceptable as per planning application planning ref PL/2021/10503.

The below details the septic tank upgrade solution.

The proposed development requires a pre-2030 mitigation requirement of **4.70 kg TP/yr.** Following the WwTW upgrade, this reduces to **2.14 kg TP/yr.**

The proposed mitigation strategy is to upgrade four septic tanks to a package treatment plant (PTP's) with high phosphorus removal efficacy, such as the HABA BioEasy Flow. This is a purely biological system and does not require chemical dosing. Upgrading of a septic tank to a higher specification system with greater efficacy for nutrient removal is an accepted mitigation strategy as agreed between Nutrient Neutral, Natural England and Wiltshire LPA (January 2022) for Planning Application number 20/06557/OUT. Wiltshire Council have also now adopted this method as a strategic approach.

The amount of 'credit' can be achieved through the upgrade the septic tanks is provided below. Discharge concentrations from the septic tank are based on the default concentrations provided within the Natural England generic calculator guidance document. The post-upgrade discharge concentrations are based on the Haba BioEasy Flow manufacturers certificate (**Appendix A4**) which indicates a total phosphorus discharge concentration of 0.8 mg/l.

Discharge concentrations

System	TP discharge concentration (mg/l)
Standard septic tank	11.60
HABA Bio Easy Flow	0.80

Septic tank upgrade summary

System upgrade	Mitigation generated (kg TP /yr per upgrade)
Septic tank to Haba Ground	1.42
Septic tank to Haba Surface water	1.17

A water usage of 141 l/p/d, the Wessex Water average water use in 2016-2017¹, has been applied to existing houses. The principle of the regional average water usage value, for an existing septic tank, was discussed and agreed with Natural England and Wiltshire Council during an inquiry (January 2022).

Five septic tanks have been identified upstream of Pewsey as eligible under the General Binding Rules and small-scale discharges criteria. These are located in the following postcodes:

- SN9 5NB
- SN9 5JN,
- SN8 3AU,
- SN8 3BW,
- SN9 5LQ

Site surveys are currently being undertaken to confirm the site-specific characteristics and also a desk-based assessment of the hydrological connectivity through consideration of the hydrogeology for those that discharge to ground, as required by Wiltshire Council.

Of the above septic tanks three discharge to surface water and two to ground, upgrading f these would result in credit generation of (6.35 kg TP/yr). Therefore, of those identified above there is more than sufficient to meet the requirement to ensure the proposed development is neutral.

The detailed site-specific information and homeowner agreements will be provided as soon as these are completed.

Yours sincerely,



Sarah Belton MSci MSc
Director & Hydrologist / Hydrogeologist

¹ PR19 Challenge report . Waterwise