



**Somerset
Council**

**Somerset Levels and Moors Ramsar
Site**

**Stretch targets at Waste Water
Treatment Works**

**Memorandum of Understanding
July 2024**

**Somerset Levels and Moors Stretch Targets
Memorandum of Understanding
June 2024**

Version History

Revision Date	Author	Version	Description of Revision
22.05.2024	P Browning	DRAFT 1	
26.06.2024	P Browning	DRAFT 2	EA feedback
01.07.2024	P Browning	DRAFT 3	JR and PB amendments flowing from meeting on 26 June 2024.
01.07.2024	M Evans	DRAFT 3	Amendments by Legal

Document Notification

Approval	Name	Date
	Alison-Blom Cooper: Somerset Council	
	John Stobart: Natural England	
	Jonathan Rayers: Wessex Water	

1. Purpose and status of the Memorandum of Understanding

1.1. This Memorandum of Understanding ('MOU') sets out the terms, principles and practices that will apply to the working relationship between Parties, namely Wessex Water, Natural England, and Somerset Council as the Local Planning Authority ('the LPA') regarding the administration and delivery of tighter permit levels to 2030 at specific Waste Water Treatment Works (WWTWs). These tighter limits/stretch targets are being offered by Wessex Water in recognition of existing/expected outperformance against permit requirements, details of which are enclosed with Appendix A.

1.2. This MOU is not legally binding, and no legal obligations or legal rights shall arise between the Parties from the provisions of the MOU. The Parties enter into the MOU intending to honour all their obligations and will continue to make best endeavours to work collaboratively with all others affected in the catchment.

2. Purpose of MOU

2.1. On 17 August 2020, all the local planning authorities in Somerset (at that time the four Districts and County Council), as well as Dorset Council received an advice

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note from Natural England (NE) 'the NE letter' concerning the unacceptable levels of phosphates in the Somerset Levels and Moors Ramsar site (SL&M) (enclosed as Appendix B).

2.2 Appendix C shows the area affected by phosphate neutrality requirements linked to the SL&M ('the affected area'). It covers a large area of Somerset and part of West Dorset and includes the river catchments of the Brue, Parrett, and Tone. All of the WWTWs listed in Appendix A are hydrologically linked to the SL&M.

2.3 It is currently estimated that there are approximately 18,000 new homes to be delivered by 2032 which are located within the affected area. These dwellings will be required to demonstrate nutrient neutrality in order for planning permission to be granted.

2.4 For new developments that utilise the WWTWs listed in Appendix A via mains drainage systems, the overall implication of the stretch targets and reduced limits permits are significantly reduced phosphate mitigation requirements. Technical limits within the Somerset Phosphate Calculator (available on the Council web site at <https://www.somerset.gov.uk/planning-buildings-and-land/phosphate-budget-calculator/>) will be amended to reflect the revised limits

2.5 All the WWTWs above are required to meet a 0.25mg/l (TAL) permit limit by 16 May 2031 through the Levelling-Up and Regeneration Act (LURA) 2023. However, Wessex Water has committed to delivery of TAL by 1 April 2030

3. Financial arrangements and risks

3.1. There are no financial arrangements associated with the MOU. These tighter limits/stretch targets are being offered by Wessex Water, in recognition of existing/expected outperformance against permit requirements.

3.2 Wessex Water have agreed to commit to targeting these tighter limits as set out in Appendix A at no additional cost to them (or their customers) or Somerset Council, and without compromising their ability to achieve all other discharge permit requirements and obligations as sewerage undertaker.

3.3. All the WWTWs are identified in Appendix A are to be upgrade to TAL by 2030. It is a less precautionary approach between now and 2030, but it is based upon current performance, and the risk of failure is small and time limited.

4. Duration

4.1 This MOU covers the financial years, 2024/25 to 2029/30. The MOU will be reviewed annually.

4.2 For phosphates, all the WWTWs listed in Appendix A will achieve 0.25mg/l (TAL) by 1st April 2030.

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4.3 Based on monitoring data, the stretch targets sets may be amended. Other WWTW's may be added to Appendix A in future years. (see Section 5: Monitoring and evaluation below).

4.4. This MOU will come into effect upon signature by all the Parties.

4.5 Upon signature by all the Parties, the stretch targets/revised technical limits will also come into effect within the Somerset P Calculator.

4.6 The arrangements shall remain in place until such time as the statutory assumptions in the Levelling-up and Regeneration Act (LURA) 2023 come into effect..

5. Monitoring and evaluation

5.1. The LPA agrees to collaborate with Natural England and Wessex Water over monitoring and evaluation requirements, regular meetings with officials and the LPA will take place as needed.

5.2. The LPA will ensure that any information published will be processed in accordance with the requirements of the data protection legislation.

5.3 With more WWTW gaining phosphorus permits from the beginning of 2025, there remains the opportunity for additional sites to outperform against these permits and be added to this MOU, by agreement from all parties.

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6. Amendment of this Memorandum of Understanding

6.1. The arrangements under this MOU will be kept under review by the LPA and can be amended upon securing written agreement between all Parties.

Signed on behalf of the LPA by:

Name: Alison Blom- Cooper
Job title: Head of Planning / Chief Planning Officer

Dated: 11 July 2024

Signed on behalf of Wessex Water by:

Name: Jonathan Rayers
Job title: Sewage Treatment Strategy Manager
Dated: 05 July 2024

Signed on behalf of Natural England by:

Name: John Stobart
Job title: Senior Officer
Dated: 05 July 2024

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Appendix A: Tighter limits / stretch targets at Waste Water Treatment Works

Catchment	WWTW's	Current P (mg/l)	2025 P (mg/l)	Average P (2021-2023)* (mg/l)	SC Calculator Value from 2025** (mg/l)	WW Proposed Limit from 2025 (mg/l)
Tone	Taunton	1 (permit)	0.8 (stretch)	0.67	0.8	0.7
Parrett	Langport	-	1 (permit 0.8 (stretch)		0.8	0.7
Brue	Wells	2	1	0.89	0.9	0.8

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Appendix B: Natural England (NE) concerning the unacceptable levels of phosphates in the Somerset Levels and Moors Ramsar site (17 August 2020)



SW&T Natural
England Advice to L

Appendix C: Somerset Levels and Moors Surface Water Catchment Area

