

Our ref: 200126 – 200124 – 003174 -
201965

Your ref:

Date: 31 October 2025

Dear Sir/Madam

We need more information about your application

Application references: 200126 – 200124 - 003174 - 201965

Operator: South West Water Limited

Facilities: Maer Lane Wastewater Treatment Works, Maer Lane, Exmouth, Devon, EX8 5DB (003174)

Maer Lane Storm Tanks, Maer Lane, Exmouth, Devon, EX8 5DB (201965)

Phear Park Pumping Station, Withycombe Road, Exmouth, Devon, EX8 1TQ (200124)

Maer Road Pumping Station SPST, Maer Road, Exmouth, Devon, EX8 2DB (200126)

Thank you for your application received on 19/09/2025.

We have reviewed the information submitted and the following information is required:

Application fees

1. The permit for the Maer Lane Storm Tanks (201965) requires a normal variation to be submitted (see below points 2a & 2b). The application fee for a normal variation under reference 1.3.19 is £5,471.

Application form missing information:

1. Maer Lane Wastewater Treatment Works

Form C6

- a) Q1c: *Is this a release from a dam, weir or sluice ('reservoir release') under Schedule 21 of the Environmental Permitting Regulations (EPR) meaning of water discharge activity?*
- b) Q3a: *Provide the Dry Weather Flow and Flow to Full Treatment calculations.*
- c) Q7f: *Will the secondary treatment system you are applying for be designed, maintained and operated to deliver the required final effluent quality?*
- d) Q7g: *You must provide details on an extra sheet of the final effluent discharge quality that the overall treatment system is designed to achieve*
- e) Q9a: *H1 risk assessment tool and raw data.*
- f) Q9b: The Exmouth Water Framework Directive Assessment does not assess the risk associated with the relocation of the outfall in terms of the final effluent and impact on

Sandy Bay Shellfish Waters.

SWW to provide a modelling report to assess this risk and the requirement to achieve:

- i) 6.6 log reduction in *E.coli* between the influent to the WwTW and Sandy Bay SFW to achieve the Water Framework Directive microbial standard of 300 *E.Coli* cfu/100 ml flesh via a geomean of 5 *E.coli* cfu/100ml in the water column within the SFW.
- ii) 5.25 log reduction in *E.coli* between the influent to a STW and the SFW PA to achieve the Class B Food Hygiene Regulations (FHR) standard of 4600 *E.Coli* cfu/100g flesh via a geomean of 110 *E.coli* cfu/100ml in the water column within the SFW.
- g) Q9c: *Sewer modelling report (for discharges of final effluent from a water company WwTW or intermittent sewage discharges)*.
The second part of Q9c has also been incorrectly completed. SWW have selected 'no' to the question *Have you answered yes to any of 8a to 8c?* To which the answer should be yes and therefore there is a requirement that a completed H1 risk assessment tool, along with the raw data used to create the summary statistics is to be submitted.
- h) Q10i has not been completed in full. The second question *If you have answered yes to 10i, where is the flow passed forward monitor installed?* remains outstanding.

2. Maer Road Storm Tanks

- a) Completed Part C2 and Part C6 need to be provided.
- b) A report to identify what improvements are required to ensure that the existing SSO does not cause Sandy Bay SFW to be non-compliant.

3. Maer Road Pumping Station

Form C2

- a) Q3d: Tick this box to confirm that you have read the guidance and that your management system will meet our requirements

Form C6

- a) Q1c: *Is this a release from a dam, weir or sluice ('reservoir release') under Schedule 21 of the Environmental Permitting Regulations (EPR) meaning of water discharge activity?*
- b) Q1d: *Have you obtained all the necessary permissions to ensure that you can undertake the proposed discharge and comply with monitoring requirements?*
- c) Q4l: What is the emergency storage capacity of the sewer and wet well?
- d) Q4m: What is the storage time within the sewer and the wet well above the top water level at dry weather flow?
- e) Q4n: What is the pass forward flow at the pumping station?

4. Phear Park Pumping Station

Form C6

- a) Q4c: *What is the total volume of on-line storage?*
- b) Q4l: What is the emergency storage capacity of the sewer and wet well?
- c) Q4m: What is the storage time within the sewer and the wet well above the top water level at dry weather flow?
- d) Q4n: What is the pass forward flow at the pumping station?

Additional Questions

Maer Lane Wastewater Treatment Works

- 5. Provide a schematic for flows to the WwTW e.g. which pumping stations pump to Exmouth WwTW.

6. Form C6 Q1a states the existing outfall location for the final effluent is SY 0241 8039 but the existing permit lists the outfall location as SY 0403 7902. Please confirm the correct NGR.

Maer Lane Storm Tanks

7. Section 4.2 in the supporting document *Exe Estuary Coastal Modelling Assessment* states that 'just based on the existing FFT from Straight Point SSO' Sandy Bay Shellfish Water (SFW) 'would be 'Uncompliant''. As the report states that modelling of the existing SSO discharge will have an impact on the Sandy Bay SFW and the proposed work to relocate the outfall has taken place since Sandy Bay SFW was designated in 2022, have SWW carried out further modelling to determine whether an extension of the outfall pipe or storm disinfection is required as per the objectives of the *Exe Estuary Coastal Modelling Assessment* during the period between the designation in 2022 and construction of the outfall and if not, explain why this hasn't taken place.
8. The supporting document *Concept Diffuser Design* dated 31 October 2023 raises the following questions.
 - a. Section 1 notes that small amounts of effluent from a combined sewage outfall may also be discharged through the Straight Point outfall at times. Please provide details on the CSO that will discharge via the outfall.
 - b. Section 3 of the report refers to the *Exe Estuary Coastal Modelling Assessment* and 'that there are currently no plans to seek designation of this site under the Shellfish Water Directive', however Sandy Bay SFW was designated in 2022 before the *Concept Diffuser Design* report was completed. Please confirm whether the design of the diffuser takes into account Sandy Bay SFW and if not, why not.
 - c. Point 5.1 refers to the new outfall being required to discharge the combination of FFT and overflows of three different STPs. Please confirm the use of the acronym 'STP' in this context.
 - d. In Section 6 of the report it is noted that '*an analyses on the duration and frequency of the peak flows is recommended to investigate the risks due to this slightly lower dilutions in peak flow conditions. In addition, a joint probably analysis of the peak flows and neap tide calm seas would be beneficial to further quantify this risk of increased plume concentrations and possible shore contact*' Did SWW follow the recommendations and:
 - i. collate data to conduct an analysis of the duration and frequency of the peak flows to assess the risks of lower dilution in peak flow conditions? If not, why did this not take place?
 - ii. carry out a joint probability analysis to further quantify the risk of increased plume concentration and possible shore contact? If not, why did this not take place?
 - e. The report goes on to state that '*If these risks are found to be significant it is required to match the performance of the existing diffuser in the peak flow conditions, then either a longer diffuser with more ports or shifting the outfall further offshore has to be considered.*' If the answer to d.i. and d.ii. above is No, and the report acknowledges that SWW would need to take action in the form of moving the outfall or extending the diffuser if the risks from further investigation were found to be significant, how has it been established:
 - i. that there is no significant risk from the proposal if the further investigations (as noted in Q2di & 2dii) did not take place
 - ii. that the diffuser, number of ports and location is environmentally protective.

9. Supporting documents '*Exmouth Sea Outfall Habitats Regulations Assessment* and *Exmouth Sea Outfall Water Framework Directive Assessment* both include the following statement: *before treatment capacity is increased, there will be an increase in settled storm sewage discharge volumes from the STW overflow but spill frequency and spill durations in the Exmouth sewerage as a whole will decrease when compared with the current operational performance...this is a preferential location for spills due to the reduced impact and the Environment Agency have expressed their preference for this temporary arrangement over the current situation.*'

It is the Environment Agency's position that the proposed approach to delivering improvements at Exmouth was not the preferred solution and therefore the above statement included in the documents is not accurate. The Environment Agency has been clear that the existing AMP7 WINEP obligation can only be signed off once the increased pass forward flows, from Maer Road pumping station (PS) and Phear Park PS, can be fully treated at Maer Lane WwTW. This has been stated at multiple points and confirmed in the letter *Exmouth WINEP Schemes: Exe Estuary and Outer Exe Shellfish Waters* dated 13th August 2024. Please ensure supporting documents are amended to remove this.

The letter dated 13th August 2024 also sets out our 'no deterioration' policy by stating the following: 'Our 'no deterioration' policy for storm overflows expects there to be no increase in spills. This means that the Exmouth SW_ND scheme, with an objective to reduce the number of spills to the Exe Estuary and Outer Exe Shellfish Waters, cannot be delivered by transferring flows and spilling them via the sewage treatment works (STW) overflow. Those transferred flows must be fully treated before they are discharged. Only then can we sign off the scheme. Signing off your scheme as complete, without treatment, would push the need, and cost of treatment, onto some future scheme. In this case the cost associated with treatment rightly sits with the AMP7 deliverables. Therefore, in accordance with our no deterioration policy we cannot accept any increase in the volume of storm sewage discharged to Straight Point.'

10. The WFD assessment and non-technical summary also notes that the works to increase treatment capacity at Maer Lane STW to reduce STW settled storm overflow discharges to less than 10 spills per annum on average in compliance with shellfish water standards will be completed by March 2028. It is understood that this date has changed. Please update the date in relevant documents to reflect the current delivery timescale and provide a timeline for the proposed improvements at Maer Lane WwTW e.g. to deliver the increase in treatment capacity and installation of a validated dose UV disinfection system. Please clarify whether the proposed improvements in treatment capacity will treat all of the additional flows that are being pumped to the WwTW from Maer Road PS and Phear Park PS.
11. The WFD assessment makes reference to a **2022 Exmouth Shellfish No Deterioration SW_ND AMP7 Projects Technical Report**. This report has not been included with the application. Please provide a copy of this report in your response.

Maer Road PS

12. Does the one outlet proposed for this variation discharge both storm and emergency overflow?
13. The site plan provided does not include the locations of screen, OT1, storage at the STW or the Flow Passed Forward monitor. Please amend and include in your response.
14. Emergency storage of 430m³ based on 3.2hrs of DWF is noted in the PSKPM document. Please confirm the current DWF upstream of the PS and Formula A at the PS and the supporting calculations.
15. The PSKPM states that 'When storm tank is full at Maer Lane the storm pumps at Maer

Road will be inhibited'. However, the Evidence Pack *Maer Road and Phear Park SPS SW_ND Measures* dated 30/09/2025 notes that during AMP7 (Phase 1) the removal of the storm inhibit at Maer Road SPS has taken place. This statement does not align with the application. Please confirm the current status of the inhibits within the network relating to Maer Lane PS, Phear Park PS and Maer Lane STW.

Phear Park PS

16. Emergency storage of 1470m³ based on 10.5hrs of DWF is noted in the PSKPM document. Please confirm the current DWF upstream of the PS and Formula A at the PS and the supporting calculations.

Please send the information, quoting the above application reference, **within 5 working days of this letter**.

You should send the information by email to lauren.perham@environment-agency.gov.uk.

If we don't receive the information, we must return your application.

When we receive the requested information, we'll continue to check your application. We'll check to see if there's enough information for the application to be 'duly made'. Duly made means that we have all the information we need to begin determination. Determination is where we assess your application and decide if we can allow what you've asked for.

We'll let you know whether your application can be duly made. If it can't be duly made, we must return your application to you.

If we return your application to you we'll send you a partial refund of your application payment. We'll retain 20% of the application charge to cover our costs in reviewing your application and requesting information. This maximum amount we'll retain is capped at £1,500. Further information on charging can be found at: <https://www.gov.uk/government/publications/environmental-permitting-ep-charges-scheme>

If you have any questions please phone me on lauren.perham@environment-agency.gov.uk.

Yours sincerely,


Permitting Officer