

Date: 24 July 2026

Environment Agency Permitting and Support Centre
Quadrant 2, 99 Parkway Avenue
Sheffield
S9 4WF

Dear [REDACTED]

Request for further information for application references: 200126 – 200124 - 003174 – 201965

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 letter dated 31 October 2025.

Process

Before we answer the questions raised in your Request for Further Information of 31 October 2025 (RFI), we wish to make an overarching comment about the Environment Agency's process in addressing this application to vary the permit to amend the grid reference for the outfall.

First, the issues raised in the RFI appear to us to be points of substance for the determination of the application, not matters that go to whether the application is 'duly made', which is an administrative assessment of whether the right forms have been submitted and the application is substantively complete (and it is SWW's position that, on 31 October, it was). Indeed, the RFI process itself is a well-understood process for obtaining information to determine an application during the consideration phase.

Secondly, many of the issues raised go to matters beyond the permit variation sought (which is, in essence, a new grid reference for the outfall), and whether or not these are required for this permit application, they are clearly not matters that go to whether this application is duly made. The company is likely to address those wider issues under separate correspondence.

Notwithstanding the above, we have responded to each of the specific queries raised below.

RFI

We wish to reiterate the reason for these permit variations as well as explain how these initial variations fit into the wider multi-AMP project for SWW's assets in Exmouth. SWW feel this clarification is needed in light of some of the questions raised as this wider context may not have been communicated as part of the permit application.

AMPZ

The Sandy Bay shellfish water was not designated at PR19 and hence not included in the Business Plan and Final Determination. When a new designation is made, an investigation is included in the next Price Review and carried out in the following AMP under the SW_INV driver. Any works are then scoped and funded in the subsequent AMP under driver SW_IMP. Our catchment strategy for Exmouth has enabled the improvements needed for Sandy Bay shellfish water (SW_IMP driver) to take place in AMP8, rather than AMP9, to further accelerate this work.

After PR19, the AMP7 improvement works was scoped and funded to deliver the new Straight Point outfall as the existing outfall does not have capacity to discharge the flows required by the AMP7 improvements. Accordingly, the design of the new outfall and diffuser has included checks on the designated waters applicable at the time of the PR19 Final Determination to ensure no deterioration. The outfall position, capacity and diffuser design have also taken into account the likely solutions for the future AMP8 Sandy Bay shellfish requirements.

The new outfall is in place and waiting to be brought into use. This application has been submitted accordingly to vary the discharge NGR within the same catchment. The permit variation will enable the use of the new outfall which will bring immediate water quality benefits for the Exe Estuary and Outer Exe Shellfish waters and the Exmouth Bathing Water. Until this outfall can be used, additional flows cannot be pumped up from Maer Road pumping station and hence spills at Maer Road PSCSOEO to the Maer Rocks outfall at Exmouth Bathing Water will continue.

The process of permitting the new outfall is distinct from the sign off of the AMP7 WINEP measures which assesses compliance with driver guidance and the requirements of Environmental Permitting Regulations. Although not strictly relevant to this permit application our position on this is given below aligned with our communications to the Environment Agency.

The AMP7 Exe Estuary Shellfish WINEP requirements are to deliver the '10 spills' solutions at Maer Road and Phear Park without causing detriment. The modelled catchment performance shows predicted increased spill volume at the STW SSO. There is no increase in the spill frequency. Hydrodynamic modelling showed no deterioration in water quality at any of the designated waters in the area at the time. The AMP7 WINEP obligations are only in relation to reducing spills, while ensuring no deterioration.

The Environment Agency's No Deterioration Policy is given here [Water companies: environmental permits for storm overflows and emergency overflows - GOV.UK](#).

Our no deterioration objective for storm overflows is to avoid any increase in pollution discharged to the water body. You must demonstrate that your proposed scheme achieves no deterioration.

Relocating or rationalising storm discharges because of a water quality improvement, flooding or growth scheme could cause localised deteriorations outweighed by improvements elsewhere in the same catchment. Contact us to see if this is likely to be acceptable. It's not acceptable to improve one catchment by causing deterioration or a breach of standards in another catchment.

We have complied with this policy by engaging with the Environment Agency via a series of meetings starting in 24th July 2019. The works are all within a single catchment and we are causing an overall improvement in environmental performance. We are relocating spills to a location where we have shown no deterioration or breach of standards at the designated waters in that area.

The need for 'full treatment' of the increased spill volume at Maer Lane STW SSO to meet the two AMP7 outputs was only introduced into the discussion in 2022. Full treatment was never part of any solutions discussed between the parties. Every other solution discussed with both the Environment Agency and Defra has consisted of either partial treatment or no treatment, but fundamentally has delivered the 10 spills with no deterioration to the waters designated at PR19. SWW understands that the full treatment may have been introduced to the discussion as part of the AMP8 obligations.

AMP8

The WINEP outputs included within the PR24 (AMP8) Business Plan Final Determination for the Sandy Bay shellfish SW_IMP driver are to ensure the discharges at the Straight Point outfall meet the standard shellfish water requirements. When the new outfall is live and the AMP7 work is complete, we will already meet the requirements of the Food Hygiene Regulations requirement at the shellfish production area without any additional treatment of effluent at Maer Lane STW. However, we will still need to limit STW SSO spills to 10 per annum on average and to ensure further reduction in E.coli concentrations to meet the Water Framework Directive requirements (6.6 log reduction). These outputs require an upgrade to not only the flows treated, but also the treatment quality.

The work to achieve the AMP8 outputs is still in the design phase. This project is where the assessments for population, DWF, 6.6 log reduction etc will be considered and an application to further update the permit, including DWF, will follow when this design is confirmed.

The new AMP7 diffuser design has contributed toward the 6.6 log reduction requirement.

Proposal

Whilst the Sandy Bay shellfish SW_IMP drivers are not due until the AMP8 sign-off date, we would welcome an improvement condition clause to be added permit, until such time as the AMP8 program of work and associated permit application is underway.

Yours sincerely,



Permitting Technician

Appendix 1 - 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?

Please see revised application form 'Maer Lane STW - Form C6.pdf'

b) Q3a: Provide the Dry Weather Flow and Flow to Full Treatment calculations.

As detailed in our letter above, we are not applying to vary the dry weather flow at this time. We will apply to vary DWF as part of the AMP8 scheme of work.

c) Q7f: Will the secondary treatment system you are applying for be designed, maintained and operated to deliver the required final effluent quality?

Please see revised application form 'Maer Lane STW - Form C6.pdf'

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

As existing

e) Q9a: H1 risk assessment tool and raw data.

Please see for Raw Data 'ExmouthSTW_FE_Metals.xlsx'

Please see "110224 -PEF-XX-XX-TTN-OP-0001 Exmouth STW_Assessment of Hazardous Pollutants.pdf" and "110224 -PEF-XX-XX-TTN-OP-0002 Exmouth STW_Assessment of Hazardous Pollutants_Addendum_F.pdf"

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.

As described in our covering letter the AMP7 requirement to for the new slightly relocated outfall is distinct from the AMP8 Sandy Bay shellfish water requirements which followed the designation of the shellfish waters in 2022.

Sandy Bay SFW was newly designated in May 2022. This had lead to AMP8 Sandy Bay SW_INV investigations and any required improvements would normally follow on in AMP9. Our work in AMP7 has enabled us to identify and accelerate the improvements into AMP8 under the SW_IMP driver.

The Sandy Bay shellfish water was not designated at the time the PR19 WINEP was published and consequently allowance for any catchment improvements targeting this newly designated water was not included in the PR19 (AMP7) Business Plan and Final Determination. However, South West Water have commissioned modelling to assess the impacts of the proposed works in relation to the two microbial reduction standards set out in the Water Framework Directive (WFD) and Food Hygiene Regulations (FHR) respectively. The assessments for the log reduction in E.coli have been completed for both the 6.6 log reduction to achieve the WFD microbial standard and the 5.25 log reduction to achieve the Class B FHR standard. This has demonstrated that the FHR 5.25 log reduction is indeed achieved under the AMP7 operating regime and new outfall position (See document ref: 110224 -PEF-XX-XX-TTN-OP-0003 Exmouth STW Assessment of Bacterial Reductions_P02).

However, the 6.6 log reduction WFD requirements are not met and consequently the planned AMP8 wastewater treatment upgrades at Maer Lane STW will address the shortfall in microbial reduction. These improvement works are planned to be delivered by the end of AMP8 (31st March 2030), accelerating the water quality improvements that would have been required had the wider catchment scheme awaited the outcomes of the AMP8 investigations.

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.

Please see revised application form: Maer Lane STW - Form C6.pdf

And H1 Assessment file: 110224 -PEF-XX-XX-TTN-OP-0001 Exmouth STW_Assessment of Hazardous Pollutants.pdf

And H1 Assessment with addendum: 110224 -PEF-XX-XX-TTN-OP-0002 Exmouth STW_Assessment of Hazardous Pollutants_Addendum_F.pdf

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.

Please see revised application form 'Maer Lane STW - Form C6.pdf'

2. Maer Road Storm Tanks

a) Completed Part C2 and Part C6 need to be provided.

Please see application form pack in sub-folder 'Maer Lane STW Storm Tank Application Forms'

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.

As described in our covering letter the additional volume spilt at the STW SSO was assessed against AMP7 requirements considering all designated waters at that time. The final effluent quality and storm overflows discharges, regardless of the AMP7 improvements, need to be improved to ensure shellfish water standards for the Sandy Bay shellfish waters. As described above we have demonstrated that the FHR 5.25 log reduction is indeed achieved under the AMP7 operating regime and new outfall position.

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

Please see revised application form 'Maer Road SPS – C2 Revised.pdf'

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?

Please see revised application form 'Maer Road SPS – C6 Revised.pdf'

b) Q1d: Have you obtained all the necessary permissions to ensure that you can undertake the proposed discharge and comply with monitoring requirements?

Please see revised application form 'Maer Road SPS – C6 Revised.pdf'

c) Q4l: What is the emergency storage capacity of the sewer and wet well?

Please see revised application form 'Maer Road SPS – C6 Revised.pdf'

As existing permit, 430m3

d) Q4m: What is the storage time within the sewer and the wet well above the top water level at dry weather flow?

Please see revised application form 'Maer Road SPS – C6 Revised.pdf'

As exiting permit, 3.2 hours, 3197 m3/day DWF

e) Q4n: What is the pass forward flow at the pumping station?

Please see revised application form 'Maer Road SPS – C6 Revised.pdf'

This has increased to 700l/s

4. Phear Park Pumping Station

Form C6

a) Q4c: What is the total volume of on-line storage?

Please see 'Phear Park SPS C6 Revised.pdf'

As existing permit, On-line: 0m3, off-line 1470m3

b) Q4l: What is the emergency storage capacity of the sewer and wet well?

Please see 'Phear Park SPS C6 Revised.pdf'

As above, 1470m3

c) Q4m: What is the storage time within the sewer and the wet well above the top water level at dry weather flow?

Please see 'Phear Park SPS C6 Revised.pdf'

As existing permit 10.5 hours

d) Q4n: What is the pass forward flow at the pumping station?

Please see 'Phear Park SPS C6 Revised.pdf'

This has increased to 200 l/s

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.

Please see 'catchment schematic AMP7 v2.pdf' for the Exmouth catchment flow schematics.

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.

The FE sample point NGR (SY 0241 8039) has been incorrectly added to C6 Q1a on the application. Please see attached revised application form.

*We can confirm that the existing discharge location is SY 03**97** 7919*

*Our records show the existing permitted outfall is SY 03**79** 7919, however we believe this was a typo at the time. This has not been noted prior to this application process.*

We have been unable to find the NGR SY 0403 7902 in the existing permit.

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.

As described in our covering letter the Sandy Bay shellfish water was not designated at PR19 and hence not included in the Business Plan and Final Determination. When a new designation is made, an investigation is included in the next Price Review (PR24) and carried out in the following AMP under the SW_INV driver. Any works are then scoped and funded in the subsequent AMP under driver SW_IMP. Our catchment strategy for Exmouth has enabled the improvements needed for Sandy Bay shellfish water (SW_IMP driver) to take place in AMP8, rather than AMP9, to further accelerate this work.

The design, affordability and procurement of the new outfall began before 2022. We did however anticipate the likely AMP8 Sandy Bay shellfish improvement solutions. The outfall was a forward-reamed directional drill - i.e. it did not break out of the seabed until finished. This was the longest forward-reamed drill completed in the UK and we could not extend the outfall drill any further. If the solutions in AMP8 required outfall extension then this would need to be done on the sea bed. However the design of the AMP8 improvements suggests that this would not be required and the log reduction can be achieved through improved treatment and dispersion.

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.

Sandy Bay PSEO 201514/PE/01. This site is currently permitted as an EO, however it is not currently connected. We will be submitting a permit application to vary this consent in the near future.

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.

The design of the new diffuser is intended to outperform the existing diffuser. The diffusion will contribute towards the AMP8 requirement for 6.6 log reduction.

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.

“Sewage Treatment Plant”. We aren’t sure why this acronym is used in this context; however we do agree that the numbers are correct. The acronym is HR Wallingford specific.

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?

The Cormix model needs to reach 'steady state' in order to generate results, which will tend to be conservative due to continually changing tidal conditions. So whilst theoretically, in steady state conditions the worst-case scenario can generate lower dilution concentrations, in reality by the time this state is reached the tidal state will have changed and dilutions will have increased. Expert judgement concluded there was no benefit in conducting a joint probability assessment.

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?

There were a number of scenarios modelled to check potential impact of storm overflow events at all designated Shellfish and Bathing Waters, not just the image shown of the plume moving toward Budleigh Salterton from the Straight Point outfall. Alternative images show the plume being advected away from Budleigh Salterton, Exmouth and Sandy Bay completely under different states of the tide.

The plume moving toward Budleigh scenario would only occur during a spring tide, and under specific wind and tidal conditions (e.g. time relative to high water), which when combined would only happen 3% of the time. In addition a storm event and spill from the SSO would also need to be occurring simultaneously to all of the environmental conditions and this reduces the likely occurrence of the plume reaching Budleigh Salterton to 1.7 times a year, lasting 3 hours each time (based on a 10 year data set using the 2050 design horizon hydraulic model).

During this 3 hour period the predicted E.coli contributed from the storm overflow would only reach a maximum of 10 cfu/100ml E.coli at Budleigh Salterton which is only 4% of the 250 cfu/100ml threshold for ‘Excellent’ bathing

water classification (as defined by the Environment Agency here: <https://environment.data.gov.uk/bwq/profiles/help-understanding-data.html>). Hence the conclusion was that this will have a negligible impact on bathing water quality at Budleigh Salterton.

The concentration of E.coli shown is notional as the purpose was to visualise potential direction of the plume, rather than the actual concentrations which are calculated separately, as above.

Furthermore, the model assumes a single discharge point and does not account for the diffusers on the end of the outfall. These are substantial and ensure that flows are diffused across the sea bed. This makes the modelled plume in the image appear much more concentrated, when in reality the diffusers provide additional dilution and dispersion of the discharge, lowering the concentrations of E.coli.

The model also includes E.coli decay rates which are always conservative, i.e. the E.coli will decay faster than what has been assumed.

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

As above - Risk not significant, expert judgement, steady state model & tidal condition movement.

ii. that the diffuser, number of ports and location is environmentally protective.

As above - Risk not significant, expert judgement, steady state model & tidal condition movement.

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.

Supporting documents have been amended, please see:

- [54388-PFC-01-XX-RP-EN-0003-P03 Exmouth WFD Assessment.pdf](#)
- [54388-PFC-01-XX-RP-EN-0002-P03 Exmouth HRA Stage 1 Screening.pdf](#)

As in covering letter assert it ourselves in response.

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.'

As stated in our covering letter, we have taken SW_ND into account. The flows are transferred within the same catchment and therefore do not contravene the ND policy. The volumes are not increasing within the same catchment by relocating the discharge in this application.

Please see '220923 SWWtoEA Exmouth WINEP – Letter.pdf'.

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.

Current proposed delivery date has not changed and remains as March 2028 subject to relevant permits and licences, the regulatory compliance date remains as March 2030 as per the current WINEP.

Yes will treat all additional flows – as per table in "REDACTED Exmouth SW_ND Technical Report June 2022.pdf"

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.

Please see “REDACTED Exmouth SW_ND Technical Report June 2022.pdf”

Maer Road PS

12. Does the one outlet proposed for this variation discharge both storm and emergency overflow?

Yes

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.

Please see revised site plan ‘Maer Road SPST site plan_Revised.doc’

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.

We would not normally provide this calculation when we are not updating this part of the permit. The 3.2hrs and 430m³ are as the existing permit issued in 1997.

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.

The Evidence Pack was a record of the works completed to end Sept 2025, but due to the permit not being ‘duly made’ the new outfall and associated inhibits and control systems are not yet in use. Once the EA has confirmed we are able to do so we will amend the outfall and associated inhibits will be changed.

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.

We would not normally provide this calculation when we are not updating this part of the permit. The 10.5hrs and 1470m³ are as the existing permit issued in 1997.