

South West Water Limited
Peninsula House
Rydon Lane
Exeter
Devon
EX2 7HR

Our ref: 200126 – 200124 – 003174 -
201965

Your ref:

Date: 17 December 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 and your response to the first request for further information on 07/11/2025.

We have reviewed the information submitted and the following information is required. Please note there are three main areas that need addressing as part of this RFI and some additional administrative questions for your attention:

1) 'Exmouth STW Assessment of Bacterial Reductions' 'Exmouth STW: Assessment of Bacterial Reductions to achieve a Target of 5.25 as a Logarithm' 110224-PEF-XX-XX-TTN-OP-0003 P02'

The report contains incorrect information regarding the location of the new outfall in relation to Sandy Bay shellfish water (SFW) area as well as the boundary of the SFW area.

Section 1.2 of the report states incorrectly that the new outfall is outside of the SFW area. The report also shows that the extent of the Sandy Bay SFW area is smaller than it appears on our mapping systems. As the location of the new outfall will be within the boundary of the shellfish production area. Please provide:

- (a) An updated report assessing the impact of the relocation of the outfall;
- (b) The CORMIX files;
- (c) Further details on how the shortfall of meeting the 6.6 log reduction Water Framework Directive target will be met by the proposed upgrades to Maer Lane STW and explain what SWW propose to protect the SFW in the interim if the shortfall is not going to be met prior to the end of AMP8 improvements in March 2030.

2) **A timeline for the delivery of improvements at Maer Lane WwTW (as requested by Question 10 of the RFI) has not been provided.**

Please provide a timeline for the proposed improvements at Maer Lane STW to deliver the increase in treatment capacity and installation of a validated dose UV disinfection system. The timeline must refer to when the 4 main steps that are required to agree the validated dose system are planned. This information is required to provide reassurance that any deterioration as a consequence of the proposed changes will be temporary.

3) **Demonstrating how the proposals comply with our SFW no deterioration policy.**

We acknowledge that the RFI response states that the proposed changes are within the same catchment, and the pumping of additional flows will be an overall improvement in environmental performance. However, to comply with our no deterioration policy, evidence that there is no deterioration or breach of standards must be provided. SWW have not demonstrated that this as there has not been a successful submission of a representative impact assessment.

The 'no deterioration' policy also states that where there are proposed schemes that could cause localised deteriorations, the Environment Agency will assess if improvements elsewhere within the same catchment outweigh the localised deterioration. Please provide evidence to demonstrate that the improvements at Phear Park PS and Maer Road PS outweigh the deterioration at Maer Lane STW.

There are also some additional administrative questions which need further clarification before we proceed.

4) Emergency storage of 430m³ based on 3.2hrs of DWF is noted in the PSKPM document for Maer Road PS. For Phear Park PS 1470m³ of storage based on 10.5 hours at DWF is noted in the PSKPM document. Please confirm the current DWF upstream of the PSs and Formula A at the PSs and the supporting calculations for both Maer Road PS and Phear Park PS.

SWW responded to the RFI stating they will not be updating this part of the permit so will not be supplying this information. However, we require this information to assess the pass forward flow increase in the context of flows that the PSs receive as this aspect of the permits have not updated since 1997 and therefore the DWF in the upstream catchment may have changed.

5) Provide the Dry Weather Flow and Flow to Full Treatment calculations for Maer Lane WwTW.

SWW responded to this question in the RFI stating they do not wish to change the DWF until AMP8. However, we require the DWF and FFT calculations in order to consult on the applications if duly made. We need to assess the headroom available at Maer Lane STW and the consequences of an increase in pass forward flow from Maer Road and Phear Park pumping stations. It is noted that the DWF in Part C6 states 10,800m³ but the current permit volume is 11,825m³, please confirm whether this is a typo.

Please send the information, quoting the above application reference, **by Friday 09th January 2026.**

We appreciate following discussion with you that there is reduced staff availability at this time of year and therefore, to accommodate this we are extending the deadline for the RFI which is ordinarily 5 working days to Friday 09th January.

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 email me on lauren.perham@environment-agency.gov.uk.

Yours sincerely,


Permitting Officer