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Date: 9th January 2026

[REDACTED]
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 17th December 2025.

Before we answer the questions raised in your Request for Further Information of 17th December 2025 (RFI), we wish to reiterate our previous 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, as we note in our letter of 12th December 2025, 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 31st 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, solely related to a new grid reference for the new outfall. While the questions raised are relevant to the subsequent ongoing projects in Exmouth, as they relate to future work, they should not affect the processing of this application to amend the NGR. Whether or not these questions are required for this permit application can be discussed further during the determination. These matters are not relevant for considering whether this application is duly made; the delay of which means we are currently unable to deliver the environmental benefits that this outfall will provide. The company has addressed these wider issues under separate correspondence.

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

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Whilst we have endeavoured to provide as much information as possible, the work to achieve the AMP8 outputs is still in progress. This project is where the assessments for population, DWF, 6.6 & 5.5 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.

Yours sincerely,

[REDACTED]

Permitting Technician

[REDACTED]
[REDACTED]

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RFI Question Responses:

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;**

Please find attached an updated report ‘110224 -PEF-XX-XX-TTN-OP-0003 Exmouth STW Assessment of Bacterial Reductions_P03.docx’.

The initial report was completed using the Shellfish Production Area designated by the FSA/CEFAS and not the WFD Shellfish Water Area (to which the 6.6 log reduction applies) as this was understood to be what was required. However, the assessment of bacterial reduction does not rely upon any secondary dilution and therefore remains unchanged despite any discrepancy between geographical data used for the assessment.

- (b) The CORMIX files;**

Please find attached the requested data files.

We received the below comment from HR Wallingford:

“These selected files are simulations carried out for the new proposed diffuser (we assume the simulations for the new diffuser is required for the permit applications) and cover the scenarios that predicted the minimum dilutions (worst cases), which were recorded at High Water +4 hours. In addition, HW+5hrs files are also included. Files for both peak and FFT flows are included.

File names contain the tidal condition (Neap Tide – NT for all files shared), tidal level (HW+4hrs and HW+5hrs), and the flow conditions (FFT or peak flow) of the simulation.

Please note that we are not sharing all the files as we have performed over 150 simulations for this study in total. Based on our experience, these selected cases should be sufficient for the EA’s purposes, however, please let us know otherwise.”

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- (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.**

It is not possible to meet the 6.6log reduction under the current treatment process. The initial dilution from the new outfall contributes to achieving the overall target as a first phase but in isolation cannot deliver 6.6log reduction without a major improvement to treatment at the works which forms the AMP8 improvement for the new Shellfish Waters. This was detailed in our technical report of June 2022 'REDACTED Exmouth SW_ND Technical Report June 2022.pdf'.

- 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.**

Please find enclosed "AMP8 Master Programme - Maer Lane Extract 06 Jan 2026.pdf" with our AMP8 timeline & "Exmouth Options Slide.pptx" with treatment options.

Our target dates for agreeing validated dose are:

- *Steps 1 & 2 - Meetings 1 & 2 end of April 2026*
- *Step 3 - Meeting 3 end of September 2026*
- *Step 4 – Indicatively from end of April 2027 following agreement of UV elements and once planning permission has been granted.*

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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.

South West Water are unaware of a ‘breach of standards’ in the No-Deterioration Policy. We submitted a technical report in June 2022 as our impact assessment – a copy of this report is attached. ‘REDACTED Exmouth SW_ND Technical Report June 2022.pdf’

The June 2022 Technical Report shows that the water quality improvements are made to the Exe Estuary and Outer Exe shellfish waters – as per the AMP7 requirements of 10 spills – whilst not causing any deterioration to any designated bathing or shellfish waters – as were designated at the time, i.e. not including Sandy Bay SFW. This report also shows that the current final effluent doesn’t meet the SFW standards, and this analysis enabled acceleration of the AMP8 improvements, which would have otherwise been in AMP9 following a Sandy Bay SFW Investigation in AMP8. We contacted the EA via ongoing meetings from July 2019 (as per Appendix D to Technical Report) to highlight these issues and maintain that this evidence demonstrates no deterioration.

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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.

We assume that this question is in response to the Phear Park PS and Maer Road PS permit applications. Please therefore find the formula A assessment attached 'Maer DWF Calcs Final.xlsx'.

These calculations have been made using the following assumptions:

- **Storage:**
 - Storage for hrs@DWF analysis includes offline permitted storage tanks and online storage between pump on level and overflow weir level, as is standard practice
- **Populations APR 2025 Figures**
- **Infiltration:**
 - IMAX 7.2.3 - [Storm overflows: policy and guidance - GOV.UK](#) for description from 2023 and 2024,
 - We have calculated infiltration on the basis of the observed I_{max} from 2023 and 2024, plus a reduction of 20% given the infiltration reduction undertaken in the catchment in AMP7.
 - Summer infiltration assume at 40% of winter IMAX.
- **Trade data** - taken from permitted trade values.

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.

Please find DWF and FFT calculations attached 'Maer DWF Calcs Final.xlsx'.

These calculations have been made using the above assumptions.

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DWF will have increased due to population increase, however we have been compliant with DWF and therefore have had no requirement to amend this as part of this application.

To confirm, this application is not to vary the DWF at this time. The DWF will be updated as part of the AMP8 scheme to increase the size of the works, for which we will be making a separate permit application.

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.

We can confirm the 10,800m3 is incorrect. Our records show the current DWF should be 11,825m3 as per the Dry Weather Flow increase modification on 30th March 2010.

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