

[REDACTED]

Date: 31st March 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 24th March 2026.

1. Please provide a marine impact assessment on all designated waters within the vicinity of the discharge point.

The Exmouth SW_ND Technical Report June 2022 considers the combined effects of the settled storm overflow (SSO) and the final effluent from Exmouth WwTW on nearby bathing waters, however, equivalent assessments have not been completed for the shellfish waters. The submitted report only assesses the impact of the final effluent being discharged at the maximum flow to full treatment (FFT) on Sandy Bay SFW and does not assess the combined effects of the SSO and maximum FFT. No assessment has been provided for either SSO or maximum FFT impact on Lyme Bay SFW.

*As the new outfall is within Sandy Bay SFW and is in close proximity to Lyme Bay SFW, the combined impacts on *E. coli* must be assessed.*

*SWW previously stated (including in the 09/01/2026 RFI response) that the 2022 SW_ND technical report showed no deterioration from the new outfall location, however the Exmouth Sea Outfall Water Framework Directive Assessment November 2025 report indicates **a medium risk of short-term adverse impacts under certain tidal and weather conditions to both Lyme Bay and Sandy Bay SFW due to increased discharge volumes and contaminant loads.** The mitigation included in the report relies on AMP8 measures to reduce spills to an average of 10 per year which SWW propose to deliver by March 2028.*

The response must therefore include a full assessment of the combined potential impacts of the maximum FFT and SSO from the new outfall on both Sandy Bay and Lyme Bay SFW, supported by modelling to show whether there is potential deterioration in water quality.



We have consulted with Stantec, our supply chain engineering consultants who undertook the original coastal modelling who have confirmed that the original modelling did not consider the Sandy Bay and Lyme Bay shellfish water boundaries. These were not designated at the time of commissioning the report (Exmouth SW_ND Technical Report June 2022) and relevant boundaries shown on Magic.gov.uk would not have been available.

Assessment and modelling of this nature is a specialist activity and takes time to commission and receive from a 3rd party contractor. An estimate of time for a complete model re-run for the shellfish water is 6-8 weeks. As detailed in our response of 7th November 2025, FHR 5.25 log reduction is 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, 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. The questions raised in this request relate to shellfish designations that were not in place at the time of the PR19 WINEP development and the AMP7 design phase for the catchment scheme.

We understand the concerns that the EA's permitting team have raised, namely that the requirements under AMP7 (originally set out pre-2022) put this team in a difficult position. SWW's AMP7 driver will not be signed off by the EA's WINEP team without a permit, and the challenges faced by the EA's permitting team are indicative of the quandary faced by SWW. SWW has requested that, in light of these challenges, the EA's WINEP team have the discretion to remove the AMP7 WINEP driver from the WINEP itself, or defer to align with the AMP8 drivers. As part of this AMP8 WINEP programme, we are progressing the required asset improvements under the SW_IMP driver to reduce the frequency of spills from the Maer Lane STW's storm sewage overflow (SSO). Consistent with our previously stated commitments, the proposed solution for this driver remains to upgrade the works to increase the flow to full treatment (FFT) capacity. This enhancement is designed to ensure compliance with the WINEP obligation to achieve no more than 10 spills per annum at Maer Lane STW to designated shellfish waters.

The final effluent discharge from Maer Lane STW will continue to undergo UV disinfection. To maintain compliance under increased throughput, we will install a new, validated UV dosing system capable of delivering effective disinfection at the higher flow rates anticipated following the upgrade. Together, these measures will provide both a reduction in storm spill frequency and sustained protection of the receiving shellfish waters at Maer Lane STW through robust final effluent treatment.

The regulatory delivery date for completion of the scheme is **31 March 2030**.

Kind regards

