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### **HPI Decision Document**

# Determination of an Application for an Environmental Permit under the Environmental Permitting (England & Wales) Regulations 2016

Consultation on our draft decision document recording the decision-making process of the decision we are minded to make

The Permit Number is: EPR/NP3924LT/A001

The Applicant / Operator is: South West Water Limited

The site is located at: Dwellings at Wadebridge Road, St

Mabyn, Bodmin, Cornwall, PL30

3BH

Consultation commences on: 10/12/2025

Consultation ends on: 12/01/2026

### What this document is about

This is a draft decision document, which accompanies a draft Permit.

It explains how we have considered the Application, and why we have included the specific conditions in the draft Permit we are proposing to issue to the Applicant. It is our record of our decision-making process, to show how we have taken into account all relevant factors in reaching our decision. Unless the document explains otherwise, we have accepted the Applicant's proposals.

The document is in draft at this stage because we have yet to make a final decision. Before we make this decision, we want to explain our thinking to the public and other interested parties, to give them a chance to understand that thinking and, if

they wish, to make relevant representations to us. We will make our final decision only after carefully considering any relevant matter raised in the responses we receive. Our mind remains open at this stage. Although we believe we have covered all the relevant issues and reached a reasonable conclusion, our ultimate decision could yet be affected by any further information that may be provided that is relevant to the issues we have to consider. However, unless we receive information that leads us to alter the conditions in the draft Permit, or to reject the Application altogether, we will issue the Permit in its current form.

In this document we frequently say, "we have decided". That gives the impression that our mind is already made up; but as we have explained above, we have not yet done so. The language we use enables this document to become the final decision document in due course with no more re-drafting than is absolutely necessary.

We try to explain our decision as accurately, comprehensively and plainly as possible. Achieving all three objectives is not always easy, and we would welcome any feedback as to how we might improve our decision documents in future. A lot of technical terms and acronyms are inevitable in a document of this nature: we provide a glossary of acronyms for ease of reference, this can be found in <a href="#">Annex</a> 1 at the end of the document.

### **Contents**

Consultation on our draft decision document recording the decision-making process of the decision we are minded to make	1
What this document is about	1
Contents	2
Preliminary information and use of terms	3
1 · Our proposed decision	4
2 · How we reached our draft decision	4
2.1 Receipt of Application	4
2.2 Confidential information	4
2.3 Identifying confidential information	4
2.4 Consultation on the Application	5
2.5 Engagement	5
3 · The legal framework	5
4 · Key Issues in the Determination	6
5 · The Regulated Facility	6
5.1 Management	6

5.2 The permitted activities	6
5.3 The site's location	7
5.3.2 Off-site conditions	7
5.4 Operation of the regulated facility	7
5.4.1 Process carried out	7
5.4.2 Environmental management system	7
5.5 Management plans	7
5.5.1 Accident management planError! Bookmark not	defined.
5.5.2 Environmental impact assessment	7
5.5.3 Environmental risk	8
6 · Nature conservation, protected species and habitat designations	8
7 · Minimising the regulated facility's environmental impact	9
7.1 Emissions to Water	9
7.1.1 Emissions to surface waters	9
8 · Draft Permit conditions, competence, monitoring and reporting	10
8.1 Emission limits	
9 · Other legal requirements	10
9.1 The EPR 2016 and related Directives	
9.2 National primary legislation	11
9.3 National secondary legislation	15
9.4 Other relevant legal requirements	
10 · Consultation Reponses	16
10.1 Advertising and Consultation on the Application	16
10.4 Representations from community and other organisations	16
10.5 Representations from individual members of the public	17
Annex 1. Glossary of acronyms used in this document	18

### Preliminary information and use of terms

We gave the application the reference number EPR/NP3924LT/A001. We refer to the application as "the **Application**" in this document.

The number we have given to the Permit is EPR/NP3924LT. We refer to the proposed Permit as "the Permit" in this document.

The Application was duly made on 23/07/2025.

The applicant is South West Water Limited. We refer to South West Water Limited as "the **Applicant**" in this document. Where we are talking about what would happen after the Permit is granted (if that is our final decision), we call South West Water Limited "the **Operator**".

South West Water Limited's proposed facility is located at Wadebridge Road, St Mabyn. We refer to this as "the regulated facility" in this document.

### 1 · Our proposed decision

We are minded to grant the Permit to the Applicant. This will allow it to operate the regulated facility, subject to the conditions in the Permit.

We consider that, in reaching that decision, we have taken into account all relevant considerations and legal requirements and that the Permit will ensure that a high level of protection is provided for the environment and human health.

The draft Permit contains conditions, including the relevant Annexes. We developed these conditions in consultation with industry, having regard to the legal requirements of the Environmental Permitting Regulations (EPR) and other relevant legislation. This document does not therefore include an explanation for these standard conditions. Where they are included in the Permit, we have considered the Application and accepted that the details provided are sufficient and satisfactory to make use of the standard condition acceptable and appropriate.

### 2 · How we reached our draft decision

### 2.1 Receipt of Application

The Application was duly made on 23/07/2025. This means we considered it was in the correct form and contained sufficient information for us to begin our determination.

### 2.2 Confidential information

A claim for commercial or industrial confidentiality has not been made by the applicant.

The decision was taken in accordance with our guidance on confidentiality.

### 2.3 Identifying confidential information

We have not identified information provided as part of the application that we consider to be confidential.

The decision was taken in accordance with our guidance on confidentiality.

### 2.4 Consultation on the Application

We carried out consultation on the Application in accordance with the EPR, our statutory Public Participation Statement (PPS) and our own internal guidance RGN 6 for Determinations involving Sites of High Public Interest. RGN 6 was withdrawn as external guidance, but it is still relevant as Environment Agency internal guidance.

We consider that this process satisfies and frequently goes beyond the requirements of the Aarhus Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters, which applies to the regulated facility and the Application. We have also taken into account our obligations under the Local Democracy, Economic Development and Construction Act 2009 (particularly Section 23). This requires us, where we consider it appropriate, to take such steps as we consider appropriate to secure the involvement of representatives of interested persons in the exercise of our functions, by providing them with information, consulting them or involving them in any other way. In this case, we consider that our consultation already satisfies the requirements of the 2009 Act.

### 2.5 Engagement

We made the Application available online via our Citizen Space page where the public were able to provide comments.

The Application and all other documents relevant to our determination are available to view on our Public Register. Anyone wishing to see these documents could do so and arrange for copies to be made.

These are bodies whose expertise, democratic accountability and/or local knowledge make it appropriate for us to seek their views directly. Note, under our Working Together Agreement with Natural England, we only inform Natural England of the results of our assessment of the impact of the regulated facility on designated Habitats sites.

Further details along with a summary of consultation comments and our response to the representations we received can be found in Section 10. We have taken all relevant representations into consideration in reaching our draft determination.

### 3 · The legal framework

The Permit will be granted under Regulation 13 of the EPR. The Environmental Permitting regime is a legal vehicle which delivers most of the relevant legal requirements for activities falling within its scope. In particular, the regulated facility is:

 subject to aspects of other relevant legislation which also must be addressed.

We address some of the major legal requirements directly where relevant in the body of this document. Other requirements are covered in Section 9 towards the end of this document.

We consider that, if we grant the Permit, it will ensure that the operation of the regulated facility complies with all relevant legal requirements and that a high level of protection will be delivered for the environment and human health.

We explain how we have addressed specific statutory requirements more fully in the rest of this document.

### 4 · Key Issues in the Determination

The key issues arising during determination of the Application were public concerns regarding the receiving watercourse being possibly seasonally dry. The petition regarding the site details 'dumping raw sewage in the village', an incorrectly sized sewage treatment plant with possible overloading, thus causing pollution and queries regarding the new development not connecting to the larger sewage treatment works at the other side of the village.

We will describe how we determined these issues in greater detail in the body of this document.

### 5 · The Regulated Facility

We considered the extent and nature of the facility at the site in accordance with RGN2 'Understanding the meaning of regulated facility'.

The extent of the facility is defined in the site plan and in the Permit. The activity is defined in table S1.1 of the Permit.

### 5.1 Management

The Applicant is the sole Operator of the regulated facility.

We are satisfied that the Applicant is the person who will have control over the operation of the regulated facility after the granting of the Permit; and that the Applicant will be able to operate the facility so as to comply with the conditions included in the Permit.

### 5.2 The permitted activities

The discharge is for a group of domestic households operated by South West Water Limited. This is an existing discharge activity. Previously the discharge did

not require a permit because it met the exemption criteria. The discharge now requires permitting due to an increase in property numbers from 7 to 34 and therefore, the maximum daily discharge volume has increased from 4.5-16.6 cubic metres ( $m^3$ ) of domestic sewage effluent only. The discharge is treated by a British Standard sewage treatment system consisting of a Rotating Biological Contact (RBC), which will discharge to a tributary of the River Allen. The area is not served by a public foul sewer.

### 5.3 The site's location

The Operator has provided a plan which we consider to be satisfactory.

These show the extent of the site of the facility including the discharge point.

The sewage treatment plant is being upgraded to accommodate the additional flows from the new properties. The location of the sewage treatment plant is unchanged and is located on a rural lane on the outskirts of the village of St Mabyn.

### 5.3.2 Off-site conditions

We do not consider that any off-site conditions are necessary.

### 5.4 Operation of the regulated facility

### 5.4.1 Process carried out

The new sewage treatment plant (STP) will accept domestic sewage effluent only from the new housing development. The STP will meet British Standards to treat the effluent to the standard acceptable for a discharge to watercourse.

### **5.4.2 Environmental management system**

We are satisfied that appropriate management systems and management structures will be in place for this regulated facility, and that sufficient resources are available to the Operator to ensure compliance with all the Permit conditions.

Our decision was taken in accordance with the guidance on Operator competence and how to develop a management system for environmental permits.

### 5.5 Management plans

#### 5.5.1 Environmental impact assessment

We have considered the planning permission and the committee report approving it.

#### 5.5.2 Environmental risk

We have carried out a risk assessment on behalf of the Operator.

The assessment shows that, applying the conservative criteria in our guidance on environmental risk assessment, all emissions may be screened out as environmentally insignificant with the exception of visual appearance and visible oil or grease.

Modelling assessments were conducted in accordance with Environment Agency guidance, including the Water Framework Directive requirement to prevent deterioration of water status.

These assessments demonstrate that increasing the maximum daily discharge volume from 4.5 m³/day to 16.6 m³/day will not result in deterioration of water quality in the receiving watercourse at the point of discharge. Effluent modelling of ammoniacal nitrogen and BOD, and mass balance calculations show that the discharge will not adversely affect water quality. These findings, supported by risk assessment tools and Environment Agency guidance, provide assurance that the plant's operation will maintain high standards of environmental protection and regulatory compliance.

## 6 · Nature conservation, protected species and habitat designations

The Conservation of Habitats and Species Regulations 2017, widely known as the Habitats Regulations, covers sites of European importance such as Special Areas of Conservation (SACs) and Special Protection Areas (SPAs). Ramsar sites, classified under the Ramsar convention of 1971, are classed as having the same protection as European sites We screen for potential effects on the ecological integrity of a European site when considering any proposal. These regulations enshrine the precautionary principle in law.

We screen for Sites of Special Scientific Interest (SSSI) as covered by The Wildlife and Countryside Act 1981 (WCA81), The Countryside and Rights of Way Act 2000 (CRoW Act) subsequently amended and strengthened this act, and the Natural Environment and Rural Communities Act 2006 (NERC06). We also screen for Marine Conservation Zones (MCZ).

Screening is also carried out for protected species, National nature reserves (NNR), Local nature reserves (LNR), Local wildlife sites (LWS), and non-statutory sites such as National Landscapes and heritage sites.

Our screening criteria are based on the risks posed by the proposed activities and the sensitivity of the receptor. We have checked the location of the proposed permission to ascertain if it is within the screening distances we consider relevant for impacts on nature conservation, landscape, heritage, protected species and habitat designations. The application is not within our screening distances for these designations.

No further assessment is required.

## 7 · Minimising the regulated facility's environmental impact

Regulated activities can present different types of risk to the environment, these include odour, noise, and vibration; accidents, fugitive emissions to air and water; as well as point source releases to air, discharges to ground or groundwater, global warming potential (GWP) and generation of waste and other environmental impacts. Consideration may also have to be given to the effect of emissions being subsequently deposited onto land (where there are ecological receptors). All these factors are discussed in this and other sections of this document.

The next sections of this document explain how we have approached the critical issue of assessing the likely impact of the emission from the regulated facility on human health and the environment and what measures we are requiring the Operator to take to ensure a high level of protection.

### 7.1 Emissions to Water

### 7.1.1 Emissions to surface waters

Modelling assessments were conducted in accordance with Environment Agency guidance, including the Water Framework Directive requirement to prevent deterioration of water status.

These assessments demonstrate that increasing the maximum daily discharge volume from 4.5 m³/day to 16.6 m³/day will not result in deterioration of water quality in the receiving watercourse at the point of discharge. Effluent modelling of ammoniacal nitrogen and BOD, and mass balance calculations show that the discharge will not adversely affect water quality. These findings, supported by risk assessment tools and Environment Agency guidance, provide assurance that the plant's operation will maintain high standards of environmental protection and regulatory compliance.

## 8 · Draft Permit conditions, competence, monitoring and reporting

### 8.1 Emission limits

We have decided that emission limits are not required in the Permit. According to EA guidance, water company permits can meet the criteria for a descriptive permit if they discharge under 50m<sup>3</sup>/day, do not contain trade effluent, do not cause significant pollution and are not close to an area of public access.

It is considered that the descriptive limits described below will prevent significant deterioration of receiving waters.

We have included these limits based on the relevant aspects of 'no deterioration' policy. We have imposed descriptive limits on visual appearance and visible oil or grease.

We have included a limit on the volume of the discharge.

Parameter	Limit (including unit)	Compliance Statistic
Maximum daily flow (domestic sewage effluent)	16.6 m³/day	Maximum
Visible oil or grease	No significant trace	NA

### 9 · Other legal requirements

In this section we explain how we have addressed other relevant legal requirements, to the extent that we have not addressed them elsewhere in this document.

#### 9.1 The EPR 2016 and related Directives

The EPR delivers the requirements of a number of assimilated and national laws.

### 9.1.1 Directive 2003/35/EC – The Public Participation Directive

Regulation 60 of the EPR 2016 requires the Environment Agency to prepare and publish a statement of its policies for complying with its public participation duties. We have published our public participation statement.

This Application has been consulted upon in line with this statement, as well as with our guidance RGS6 on Sites of High Public Interest, which addresses specifically extended consultation arrangements for determinations where public interest is particularly high. This satisfies the requirements of the Public Participation Directive.

### 9.2 National primary legislation

#### 9.2.1 Environment Act 1995

(i) Section 4 (Pursuit of Sustainable Development)

We are required to contribute towards achieving sustainable development, as considered appropriate by Ministers and set out in guidance issued to us. The Secretary of State for Environment, Food and Rural Affairs has issued The Environment Agency's Objectives and Contribution to Sustainable Development: Statutory Guidance (December 2002). This document; "provides guidance to the Agency on such matters as the formulation of approaches that the Agency should take to its work, decisions about priorities for the Agency and the allocation of resources. It is not directly applicable to individual regulatory decisions of the Agency."

Paragraph 4.2 of this Guidance provides the objectives we are to pursue when discharging our main operational functions. As far as determining applications for water discharge permits is concerned, this states that we are;

'To protect, enhance and restore the environmental quality of inland and coastal surface water and groundwater, and in particular:

- to address both point source and diffuse pollution;
- to implement the EC Water Framework Directive; and
- to ensure that all relevant quality standards are met.'

The Environment Agency considers that it has pursued the objectives set out in the Government's guidance, where relevant, and that there are no additional conditions that should be included in this Permit to take account of the Section 4 duty.

(ii) Section 5 (Preventing or Minimising Effects of Pollution of the Environment)

We are satisfied that our pollution control powers have been exercised for the purpose of preventing or minimising, remedying or mitigating the effects of pollution.

(iii) Section 6(1) (Conservation Duties with Regard to Water)

We have a duty to the extent we consider it desirable generally to promote the conservation and enhancement of the natural beauty and amenity of inland and coastal waters and the land associated with such waters, and the conservation of flora and fauna which are dependent on an aquatic environment.

We consider that no additional or different conditions are appropriate for this Permit.

### (v) Section 7 (General Environmental Duties)

This places a duty on us, when considering any proposal relating to our functions, to have regard amongst other things to any effect which the proposals would have on sites of archaeological, architectural, or historic interest; the economic and social well-being of local communities in rural areas; and to take into account any effect which the proposals would have on the beauty or amenity of any rural or urban area or on any such flora, fauna, features, buildings, sites or objects.

We considered whether we should impose any additional or different requirements in terms of our duty to have regard to the various conservation objectives set out in Section 7 but concluded that we should not.

### (vi) Section 39 (Costs and Benefits)

We have a duty to take into account the likely costs and benefits of our decisions on the applications ('costs' being defined as including costs to the environment as well as any person). This duty, however, does not affect our obligation to discharge any duties imposed upon us in other legislative provisions.

In so far as relevant we consider that the costs that the permit may impose on the applicant are reasonable and proportionate in terms of the benefits it provides.

### 9.2.2 Section 108 Deregulation Act 2015 – Growth duty

We considered our duty to have regard to the desirability of promoting economic growth set out in section 108(1) of the Deregulation Act 2015 and the guidance issued under section 110 of that Act in deciding whether to grant this permit.

Paragraph 1.3 of the statutory guidance issued by the Department of Business, Energy and Industrial Strategy in March 2017 says:

"The primary role of regulators, in delivering regulation, is to achieve the regulatory outcomes for which they are responsible. For a number of regulators, these regulatory outcomes include an explicit reference to development or growth. The growth duty establishes economic growth as a factor that all specified regulators should have regard to, alongside the delivery of the protections set out in the relevant legislation."

We have addressed the legislative requirements and environmental standards to be set for this operation in the body of the decision document above. The guidance is clear at paragraph 1.5 that the growth duty does not legitimise non-compliance, and its purpose is not to achieve or pursue economic growth at the expense of necessary protections.

We consider the requirements and standards we have set in this permit are reasonable and necessary to avoid a risk of an unacceptable level of pollution. This promotes growth amongst legitimate operators because the standards applied to the operator are consistent across businesses in this sector and have been set to achieve the required legislative standards. It also ensures that any pollution that may arise from the regulated facility does not adversely affect local businesses.

### 9.2.3 Legislative and Regulatory Reform Act 2006

In accordance with section 21 of this Act, when making this decision we have had regard to the need to be transparent, accountable, proportionate and consistent, and the need to target action where it is needed.

In accordance with section 22 of the Act we have had regard to the Regulators' Code; in particular the need to base our decision on environmental risk, and to support the applicant to comply and grow, so that burdens have only been imposed where they are necessary and proportionate.

### 9.2.4 Human Rights Act 1998

We have considered potential interference with rights addressed by the European Convention on Human Rights in reaching our decision and consider that our decision is compatible with our duties under the Human Rights Act 1998. In particular, we have considered the right to life (Article 2), the right to a fair trial (Article 6), the right to respect for private and family life (Article 8) and the right to protection of property (Article 1, First Protocol). We do not believe that Convention rights are engaged in relation to this determination.

### 9.2.5 Countryside and Rights of Way Act 2000 (CROW 2000)

Section 85 of this Act imposes a duty on Environment Agency to seek to further the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty (AONB). There is no AONB which could be affected by the regulated facility.

#### 9.2.6 Wildlife and Countryside Act 1981

Under section 28G of the Wildlife and Countryside Act 1981 the Environment Agency has a duty to take reasonable steps to further the conservation and enhancement of the flora, fauna or geological or physiographical features by reason of which a site is of special scientific interest. Under section 28I the

Environment Agency has a duty to consult Natural England in relation to any permit that is likely to damage SSSIs.

#### 9.2.7 Natural Environment and Rural Communities Act 2006

Section 40 of the Natural Environment and Rural Communities Act 2006 has been amended with effect from 1 January 2023 to require consideration as to what action we can properly take, consistently with the proper exercise of our functions, to further the general biodiversity objective, which is to further the conservation and enhancement of biodiversity and having considered, determined such policies and specific objectives as we consider appropriate for taking action to further the general biodiversity objective, and take such action as we consider appropriate, in the light of those policies and objectives, to further that objective.

Section 40(2A) states that in complying with the duty in section 40(1) and (1A) we must have particular regard to any relevant local nature recovery strategy and species protection strategy or protected sites strategy.

We have, also, considered the general biodiversity objective when carrying out our permit application determination and, consider that no different or additional conditions are required in the permit.

### 9.2.8 Countryside Act 1968

Section 11 imposes a duty on the Environment Agency to exercise its functions relating to any land, having regard to the desirability of conserving the natural beauty and amenity of the countryside including wildlife. We have done so and consider that no different or additional conditions in the Permit are required.

### 9.2.9 National Parks and Access to the Countryside Act 1949

Section 11A and section 5(1) imposes a duty on the Environment Agency when exercising its functions in relation to land in a National Park, to further the purposes of conserving and enhancing the natural beauty, wildlife and cultural heritage of the areas, and of promoting opportunities for the understanding and enjoyment of National Parks by the public.

There is no National Park which could be affected by the regulated facility.

## 9.2.10 Water Resources Act 1991 (particular regard to duties of water and sewerage undertakers imposed by Parts II-IV of the Water Industry Act 1991)

Section 15 requires that in considering this application the Environment Agency must have particular regard to the duties imposed upon sewerage and water undertakers under Parts II –IV of the Water Industry Act 1991. This includes the water supply duties in Part III, and specifically the section 37 duty imposed on

every water undertaker 'to develop and maintain an efficient and economical system of water supply within its area, and to ensure that all such arrangements have been made for providing supplies of water to premises in that area and for making such supplies to persons who demand them...'.

It also includes the duty to provide a system of public sewers in Part IV and the disposal and treatment of sewage at sewage treatment works.

The duty applies equally to consideration of water company activities and permits/licences relating to abstraction of water and treatment/discharge of sewage.

As covered in Section 10, there is no foul sewer within reasonable distance of the facility.

#### 9.2.11 Environment Act 2021

Section 110(10) requires that we must have regard to a protected site's strategy, which Natural England has prepared and published in relation to improving the conservation and management of a protected site, and managing the impact of plans, projects or other activities (wherever undertaken) on the conservation and management of the protected site, where relevant to exercise of our duties under Conservation of Habitats and Species Regulations 2017, sections 28G to 28I Wildlife and Countryside Act 1981 or Marine and Coastal Access Act 2009.

No protected sites were within our screening distance for the discharge.

### 9.3 National secondary legislation

### 9.3.1 Water Environment (Water Framework Directive) Regulations 2017

Consideration has been given to whether any additional requirements should be imposed in terms of the Environment Agency's duty under regulation 3 to secure compliance with the requirements of the Water Framework Directive, Groundwater Directive and the EQS Directive through, amongst other things, environmental permits, and its obligation in regulation 33 to have regard to the river basin management plan (RBMP) approved under regulation 31 and any supplementary plans prepared under regulation 32. However, it is felt that existing conditions are sufficient in this regard and no other appropriate requirements have been identified.

We are satisfied that granting this application with the conditions proposed would not cause the current status of the water body to deteriorate, and that it will not compromise the ability of this water body to achieve good status by 2063.

In taking this decision, we have applied the physico-chemical standards, environmental quality standards and biological element status boundary values for surface water bodies specified in Articles 8-10 of, and Schedule 3 to, the Water

Framework Directive (Standards and Classification) Directions (England and Wales) 2015.

### 9.4 Other relevant legal requirements

### 9.4.1 Duty to Involve

Section 23 of the Local Democracy, Economic Development and Construction Act 2009 require us where we consider it appropriate to take such steps as we consider appropriate to secure the involvement of interested persons in the exercise of our functions by providing them with information, consulting them or involving them in any other way. Section 24 requires us to have regard to any Secretary of State guidance as to how we should do that.

The way in which the Environment Agency has consulted with the public and other interested parties is set out in section 10 of this document. The way in which we have taken account of the representations we have received is set out in section 10. Our public consultation duties are also set out in the EP Regulations, and our statutory Public Participation Statement, which implement the requirements of the Public Participation Directive. In addition to meeting our consultation responsibilities, we have also taken account of our guidance in Environment Agency Guidance Note RGS6.

### 10 · Consultation Reponses

### 10.1 Advertising and Consultation on the Application

The Application has been advertised and consulted upon in accordance with the Environment Agency's Public Participation Statement. The way in which this has been carried out along with the results of our consultation and how we have taken consultation responses into account in reaching our draft decision is summarised in this Annex. Copies of consultation responses have been placed on the Environment Agency public register.

The Application was advertised on the Environment Agency website from 20/08/2025 to 17/09/2025.

It was not necessary to consult statutory or non-statutory bodies for this site.

### 10.4 Representations from community and other organisations

Representations were received in the form of a petition.

**Brief summary of issues raised:** A link was provided from an individual representation to a petition opposing the proposals, which has attracted over 1000 signatures (at the time of writing) from individuals seeking to prevent the proposed works from proceeding. The petition page states the South West Water are seeking to 'exploit permitted development rights to install a small " sewage treatment works"

to serve the new estate'. The petition calls on South West Water to abandon their plans which involve 'dumping raw sewage' in the village. It calls on the Environment Agency to investigate thoroughly. It is stated that the proposed sewage treatment is 'far too small' and would 'very quickly be overwhelmed, leading to serious pollution problems and consequent health risks'. The petition calls for a fundamental review of groundwater pollution problems in the Parish of St Mabyn.

### **Summary of actions taken:**

Extensive internal consultation has been carried out on the proposed site, involving several Environment Agency area teams. These included Environmental Management (EM – Land and Water), Fisheries, Biodiversity and Geomorphology (FBG), Analysis and Reporting (A and R), and Integrated Environment Planning (IEP). Following these consultations, no concerns were raised in relation to the proposals.

To ensure the suitability of the proposals for the site, Environmental Management has conducted at least two site visits. These visits were undertaken to confirm that the measures being proposed are adequate and that the proposed sewage treatment plant (STP) is appropriately sized for the requirements of the location.

The proposed STP has been designed to provide secondary treatment to the effluent, ensuring that the discharge meets the necessary environmental standards.

### 10.5 Representations from individual members of the public

1 response was received from an individual member of the public.

**Brief summary of issues raised:** One representation objected to the proposal by South West Water Limited (SWW) to upgrade the Wadebridge Road treatment plant. The respondent requested that, instead of upgrading the existing facility, SWW should connect the site to the St Mabyn wastewater treatment works.

Concerns were also raised regarding the seasonal drying up of the receiving watercourse, which may impact the effectiveness of the discharge and local environment.

**Summary of actions taken:** Modelling indicates that the proposed measures will not degrade the watercourse by more than 10% and will not result in the breach of established class boundaries. As St Mabyn wastewater treatment works is located approximately 2.5 km away (in a straight line), connecting to these facilities is considered unfeasible due the distance and crossing over multiple private properties and an SSSI. Consequently, the only viable option is to upgrade the existing sewage treatment plant, with continued discharge into the tributary of the River Allen.

Site visits have been undertaken by Area teams which have found that the existing outfall is in good condition, showed no signs of fungus and water quality testing downstream from the discharge location was good.

### Annex 1. Glossary of acronyms used in this document

CROW	Countryside and rights of way Act 2000
EPR	Environmental Permitting (England and Wales) Regulations 2016 (SI 2016 No. 1154) as amended
EQS	Environmental Quality Standard
GWP	Global Warming Potential
HPI	High public interest
LNR	Local nature reserve
PPS	Public participation statement
RGN	Regulatory Guidance Note
SAC	Special Area of Conservation
SHPI(s)	Site(s) of High Public Interest
SPA(s)	Special Protection Area(s)
SSSI(s)	Site(s) of Special Scientific Interest