



Exeter City Council

A meeting of **EXETER CITY COUNCIL** will be held at the **GUILDHALL, HIGH STREET, EXETER** on **TUESDAY 21 FEBRUARY 2023**, at 6.00 pm, at which you are hereby summoned to attend.

If you have an enquiry regarding any items on this agenda, please contact Mark Devin, Democratic Services Team Leader on 01392 265477.

The following business is proposed to be transacted:-

	Pages
15 Notice of Motion by Councillor Read under Standing Order No. 6	

The Council notes:

3 - 6

In July 2019 Exeter, along with hundreds of other Councils, declared a climate emergency. This declaration was strengthened in April 2021 by including biodiversity. The Rivers Trust says 'Rivers are in the forefront of our climate and nature crisis. For habitats to adapt and recover from climate shocks, we need healthy rivers'. The Council has an obligation to protect its rivers and the City Council's Harbour Board has, as one of its core values "We will lead in environmental stewardship of the Port." The Exe Estuary has the highest protection status afforded to it and is designated a Site of Special Scientific Interest and a Special Protection Area because it supports internationally important populations of birds such as the Slavonian Grebe and the Avocet, as well as Dunlin, Oystercatcher, Blacktailed Godwit and more.

The issue of sewage pollution of rivers and the sea is rightly high on the public and political agenda as the Environment Agency recently revealed that not one English waterway, including rivers, lakes, estuaries and coastal waters is in good ecological and chemical health at present. Pollution from water treatment plants and agriculture are the key sources of the damage. Meanwhile the Environment Agency recently shockingly announced that the target to clean up the majority of England's rivers, lakes and coastal waters has been pushed back 36 years, from 2027 to 2063. To date, only stretches of two rivers in the UK have been granted bathing status, a section of the Wharfe and of the Thames.

This Council resolves to:

1. Recognise that there is clear evidence of poor water quality in the Exe due to cumulative impact of multiple sewage discharge events or 'sewage overload'.
2. Request from South West Water that an evidence base is compiled that assesses the cumulative impact of sewage discharge on ecological river health, and in addition the impact of polluted water on wildlife and biodiversity along the banks of the river should be monitored.

3. Ask the Chair of the relevant Scrutiny Committee to invite the Chief Executive of South West Water plus senior representatives from the Environment Agency and Natural England/Natural Resources Wales to attend a meeting to answer questions on the current levels of sewage discharge.
4. Ask the Chair of the relevant Scrutiny Committee to contact the Department for Environment, Food and Rural Affairs (DEFRA) and the regional director of the National Farmers' Union for clarification on action being taken by local farmers to prevent agricultural waste flowing into the river.
5. Ask South West Water from this date onwards, in its planning consultation responses for major development, to clarify which treatment works will be managing the sewage; whether it has the information available to assess the impact on the number or duration of sewage discharges into local rivers or seas, and if it does have this information to share it (noting that this can only be requested not required).
6. Request Exeter City Council to lobby both our local Members of Parliament, the Local Government Association and the Department for Communities and Local Government to ban sewage discharges into swimming areas and where protected wildlife lives.

Date: Monday 13 February 2023

Karime Hassan MBE
Chief Executive & Growth Director

John Street
Corporate Manager Democratic and Civic Support
Exeter City Council
Civic Centre
Exeter
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Sent via email

Wednesday, 22 March 2023

Dear Mr Street,

Thank you for your letter to Susan Davy regarding the River Exe dated 10 March 2023. She has asked me to respond on her behalf.

We recognise the significance of Exeter City Council discussing the matter of the quality of the River Exe at your recent meeting. The health of our rivers and seas, as well as reducing the use of storm overflows, are important priorities for our customers and communities. We share these priorities too.

We acknowledge the questions posed to South West Water in resolution two and five, with reference to resolution three. As such, we will take these resolutions in turn and provide a response.

Firstly, in response to resolution two, regarding the request for an evidence base to assess the cumulative impact of sewage discharge on ecological river health, in addition to the impact on wildlife and biodiversity along the banks of the river. We need to consider the three water bodies associated with the Exeter City Council area. The three water bodies include Lower Exe (Clyst to Estuary), Northbrook (East Devon) and Lower Clyst. Using publicly available data from the Environment Agency and examining the Reasons for Not Achieving Good Status (RNAGS) we can provide a summary of water quality in each water body.

Water body RNAGS identify the pressures that are impacting the status classification of water bodies. This data supports the Water Framework Directive River Basin Management Plans.

	Water Body		
	Lower Exe (Creeedy to Estuary)	North Brook	Lower Clyst
Overall Status	Moderate	Moderate	Moderate
Fish	High Quality	Poor	Moderate
Invertebrates	N/A	Moderate	High
Ammonia	High Quality	High	High
Phosphate	Moderate	Moderate	Moderate
Hydrological Regime	Supports Good	Supports Good	Supports Good
Chemical	FAIL (Hg / PBDE / Dichlorvos)	FAIL (Hg / PBDE)	FAIL (Hg / PBDE)
Number of RNAG's	7	12	6

RNAGS	Water Body		
	Lower Exe (Creedy to Estuary)	North Brook	Lower Clyst
Water industry	2	2	0
Urban / Transport	0	4	0
Domestic General	0	2	0
Local / Government	1	2	1
No Sector	2	2	2
Agriculture	2	0	3
Contaminated Land	0	2	0
Sewer Misconnections	0	2	0
Intermittent Sewage*	0	2	0
Continuous Sewage*	2	0	0
Agriculture Land Management	2	0	3
Physical modifications	1	1	0
Other'	2	5	3
* = Water Industry			

You will note in the second table that 2 RNAGS in the Lower Exe have been attributed to the water industry. South West Water have no direct treatment (continuous) discharges into the Lower Exe; we therefore consider that the two Water Industry RNAGs on the Lower Exe are associated with upstream activity, perhaps from the Exe/Culm or Creedy. Both of these waterbodies have RNAGs associated with phosphorous discharges/phosphate. We have a number of schemes planned to investigate and/or address this issue in the upstream catchments.

Meanwhile, the RNAGs on the North Brook attributed to the water industry are 'intermittent' discharges, most likely to be associated with Combined Sewer Overflow (CSO) discharges.

Countess Wear Sewage Treatment Works (STW) discharges into the Exe Estuary water body. The Water Industry is associated with one of the 10 RNAG's in this waterbody. Estuary water quality management is treated differently from the freshwater quality metrics, and phosphate is not considered a parameter of concern in estuaries.

In relation to the impact of any overflow spills on wildlife and biodiversity, we undertake impact assessments for storm overflows using the Storm Overflow Assessment Framework developed jointly between the Environment Agency and the Water Industry. We are set to embark on over 300 of these assessments by 2025.

We have completed Storm Overflow Assessment Framework assessments at West Exe and Little Silver in Tiverton, with both concluding that dilution in the river is high. Using this assessment, South West Water have developed solutions with additional stormwater storage benefit for these overflows, to provide emergency storage and reduce potential pollution incidents.

In March 2022, we also carried out improvements to Exeter storm overflows, based on achieving 10 significant spills per bathing season designed to improve Shellfish quality in the Estuary. The CSOs included in these improvements were:

- Burnthouse Lane CSO
- First Avenue Service Lane CSO
- Holloway Street/Topsham Road CSO (these were combined into one asset and relocated)
- Buddle Lane CSO (aka John Stoker School)
- Larkbeare House CSO
- Okehampton Road CSO
- Tan Lane PS CSO/EO (Emergency Overflow)

Additionally, we made significant improvements to the Kenn and Kennford Sewage Treatment Works with additional storage and putting in a third stage Ultra-Violet (UV) disinfection treatment plant in March 2022. Countess Wear storm overflow also has UV treatment.

As requested in resolution three, we would be happy to organise a mutually convenient time for representatives of South West Water to attend a meeting with Council officials, joined by representatives from the Environment Agency and Natural England. My colleagues will be in touch separately to help arrange this meeting.

On resolution five, regarding South West Water's approach to managing flows, the location of the treatment works and how these will be managed with respect to new developments and potential impacts, our long-term planning for future growth is undertaken through our [Drainage and Wastewater Management Plans \(DWMP\)](#). We published our draft DWMP in June 2022 and consulted on these plans including a detailed Level 2 plan for the Exeter catchment, which can be found [here](#).

We consulted on these plans in the Autumn of last year and undertook a number of workshops with members of Exeter City Council in attendance and this included a more detailed workshop with Council staff on 28 November. We did not receive a formal written response to the consultation. All consultation responses are being incorporated into our final DWMP to be published at the end of May 2023.

In our plan, we have identified the significant new development planned to the east of Exeter (near Woodbury) and are considering whether it may be necessary to build a new sewage treatment works in this vicinity to take flows from the new development, in addition to that from housing already constructed at Cranbrook and Rockbeare. This new site would then allow additional capacity at Countess Wear Sewage Treatment Works to support further growth in the City itself. Our considerations are in the early stages, but we would welcome the opportunity to have a more detailed discussion with Council officials.

Additionally, we are already examining flows within the Exeter catchment and considering how these currently transfer to the Countess Wear Sewage Treatment Works. Improvements are planned at the works from 2025 to increase capacity to treat flows associated with future development until the more detailed work around and east of Exe treatment works is completed.

We know that storm overflows, the safety valves in our network to prevent homes and businesses from being flooded, are now the unacceptable face of the water sector. Having better data to understand what is happening in the system has been a positive step to help us improve. With monitoring now installed on 100% of our storm overflows, we are now able to monitor and can act on activity on hundreds of storm overflows across our region. Our 2022 data, shared with the Environment Agency for final review, will show a circa a third reduction over the year in average spills.

Thank you again for taking the time to contact us. I hope the information provided is useful and addresses the queries requested by the Council.

We look forward to meeting with you.

Yours sincerely,



Bev Rowney
Head of Corporate and Colleague Communications
Pennon Group Plc



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