

John Street  
Corporate Manager Democratic and Civic Support  
Exeter City Council  
Civic Centre  
Exeter  
EX1 1JN

*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 (Creedy 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,

A handwritten signature in black ink that reads "Bev Rowney". The signature is written in a cursive, flowing style.

**Bev Rowney**  
Head of Corporate and Colleague Communications  
Pennon Group Plc



**Fair Tax**

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