

Date: 26 May 2023

Our Ref: EIR23093

Sent via email

Dear Vicki Elcoate

1. Background

I refer to your request for information sent to Vicky Garner on 18 April 2023. The questions within that letter are being responded under the Environmental Information Regulations 2004 ("Regulations"). Questions have been extracted as per the blue highlighted areas below.

Thank you for the statement you provided (see below).

We accept that some of these discharge totals may not reflect what is really happening. The Uplyme STW CSO and the Jericho CSO data seems very high compared with the previous year and with observations (one of the Monitors lives opposite the Jericho CSO). Conversely, the Gun Cliff CSO shows a dramatic decrease from c. 73 hours to c. 5 which isn't consistent with local observations. Of course we welcome any decreases in sewage discharges but we would like to be confident in the data provided. Please could you provide further information on these readings (Uplyme STW, Jericho and Gun Cliff) which seem to be against the trend.

The actions being taken at the Uplyme STW are welcome - **please could you let us know what steps are being taken to reduce discharges there.**

In the case of the River Lim we do not agree that 80% of its problems are being caused by other factors than sewage. We have overwhelming and independently confirmed evidence, of which SWW is aware, that sewage is the main cause of the ecological degradation of the river. Awareness of it prompted the health warning posted at our traditional paddling area and causes the poor water quality at Church Cliff Beach. We are doing our part by providing you with information, reporting pollution and providing information to the local community about potential problems like putting garden waste into the river or compost next to it. We're also raising awareness about flea collars etc. But when we watch the sewage flowing down the river, and our wildlife in such a dramatic decline we must keep the pressure on the main cause of the problem which I hope we all agree is solvable.

We held a meeting yesterday for beachfront businesses and water user groups. It was very well attended and our aims supported. **These questions arose from it – please treat them as FOIA/EIR questions if needed.**

1. We ask that SWW brings forward the promised £20m investment spending from 2025 into the next financial year. Please could that be considered and an answer provided.
2. Please could you provide details of how that sum is planned to be spent (ie on what and by when) and what beneficial outcomes we can expect to see as a result of it. Is it to be spent on the six storm overflows referred to and in which case what are the improvements and by how much will these improvements reduce discharges? Will capacity be increased at the STW and various staging posts including Anning Road? And does it include the Horn Bridge pump upgrade already identified or is that additional?
3. What can we – as a local community - do to help expedite this investment which we hope will be a significant contribution to improving the River Lim water quality and the reputation of SWW and Lyme Regis itself?

We are progressing with the bathing water application at Church Cliff Beach and we wouldn't want a repeat of the poor water quality performance that was the underlying cause of the de-designation in 2016. As you know, the river is already ecologically degraded to a very serious extent through a combination of permitted sewage discharges, apparent dry spills, pumping station problems and illegal misconnections. Once the real time data for the River is available later this year, as SWW is promising, there will be a greater opportunity for vigilance on the part of the local community and it would be so positive if this was tied in with improvements in the system to reduce concerns.

Liz has been sharing the action being taken by SWW on the seafront, which is good news.

This letter provides the response to your request.

2. South West Water's (SWW) Response

I can confirm that SWW does hold information of the type you have requested.

Under the Regulations, SWW has a duty to individuals requesting information to make that information available on request. SWW must comply with this duty, unless one of the exceptions contained within the Regulations applies.

Information is provided as follows.

Data

A further review of the data has been undertaken to analyse how our Event Duration Monitors (EDM) measure how the waste water treatment works, and the networks, are operating.

Our Annual Return for 2022 said there were 43 spills associated with Jericho CSO, however, having completed a detailed analysis, this number was overstated by c50%. We are taking steps to ensure future monitoring is accurate.

Our 2022 Annual Return for Uplyme waste water treatment works (WWTW) also reported a considerable increase in duration of spills from 2020 to 2022. Once again, we have re-analysed the data and discussed it with our on-site teams with the following outcomes:

- we now believe the hours of storm releases are over-stated because of the way the EDM is set up on this site. We are currently reviewing what changes need to be made to ensure the robustness of the system and data.
- there has been some increase on previous years in spilling associated with the pumping arrangements at the WWTW, these have now been rectified.
- to provide further context, various operational improvements have taken place since last summer. These include trend data reviews and analysis of pumping efficiency. In November 2022, we worked with our contractor to undertake more detailed reviews of the site arrangements and pumping. This has led to new pumps installed earlier this month. Importantly, our initial analysis shows an immediate improvement in the pumping efficiency which will in turn improve the efficacy of operations at Uplyme WWTW.

Water Quality Monitors

Upstream and downstream monitoring of storm overflows is part of the requirement of the Environment Act and investigations are underway to look at placing continuous water quality monitors in key locations on the River Lim, which will provide us with a good indicator of where potential sources of poor water quality are arising.

Investment

All of the planned work is associated with improvements to Shellfish waters and is scheduled for completion by March 2027 including at Front Beach, and SWW are already looking to bring forward investment that was originally planned to take place in the funding period 2025-2030. The request to bring forward the investment is subject to regulatory approval.

Transitional funding is a mechanism Ofwat uses to allow early delivery of outputs ahead of the start of the next regulatory period. We will be seeking the inclusion of the schemes in Lyme Regis in our Business Plan to Ofwat in October 2023.

We are already undertaking investigations and surveys within the town to confirm the scope of the improvements and benefits. These will form the detailed design of the improvements in the catchment. Once investment is agreed with Ofwat then contractors will be appointed and start dates agreed. Ahead of construction we will meet with stakeholders across Lyme Regis to discuss the schemes, improvements and discuss the impact that the construction activity will involve so that we can work together to reduce the impact whilst these important asset improvements occur.

Scope and Improvements

- Solutions under shellfish improvements cover all 3 of the storm overflows and also Hornbridge.
- Control and instrumentation improvements will be under taken at Hornbridge, the work has been fast-tracked into our WaterFit initiative and will be investigated to identify what cost-effective action can be taken before 2025 to reduce spills towards the target of 10 spills per annum.
- New screens will be installed at Gosling Bridge and Mill Lane.
- Storm storage at Uplyme WWTW will be increased, in order to reduce storm spills.
- Surface water separation activities will be undertaken in the network reducing volumes of storm water reaching the WWTW.
- Anning Road pump station has no overflow so there is no discharge to the river.
- Work at The Cobb is scheduled to complete by March 2030.

Our WaterFit commitment target is for no more than 10 spills a year on average at designated bathing waters and an average of 20 spills by 2025 across all locations (bathing waters and rivers). For further information about [WaterFit \(southwestwater.co.uk\)](https://www.southwestwater.co.uk/waterfit)

3. Further Queries

Should you have any questions, please contact us at finreg@southwestwater.co.uk. If you are dissatisfied with the handling of your request, you have the right to ask for an internal review. Internal review requests should be submitted within 40 working days of the date of receipt of this response and should be addressed to Dr Lisa Gahan (Regulatory Director) who can be contacted by e-mail on EIInternalreviews@southwestwater.co.uk

If you are dissatisfied with the outcome of the internal review, you can apply, without charge, to the Information Commissioner, who will consider whether SWW has complied with its obligations under the Regulations and can require SWW to remedy any problems. You can find out more about how to do this, and about the Regulations in general, on the Information Commissioner's website at: www.ico.org.uk. Complaints to the Information Commissioner can be made via the "report a concern" section of the Information Commissioner's website.

With best regards,

South West Water

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