

Date: 5<sup>th</sup> November 2021

Sent via email

Dear Sandra Harris, Town Clerk

## 1. Background

I refer to your request for information received 11<sup>th</sup> October 2021 which is being responded to under the Environmental Information Regulations 2004 ("Regulations"). Your request reads as follows:

- a) The perceived inability of the Sewage Works to cope with the current and future projected loads.
- b) That the residents have been advised that the Shire Hall Moor Treatment Works has discharged into the River Fowey on 130 separate occasions in a 12 month period.
- c) That the repeated assurances given by South West Water that the sewage works is capable of safely handling the current demand when during flooding raw sewage is seen floating in the flood water
- d) The potential health impact to residents and visitors to Lostwithiel who bath in the River during the summer months.
- e) Are there limits given on SW Water's discharge consent for this Treatment Works
- f) Can a copy of the Environment Agency's current Discharge consent be forwarded for examination so the stipulations and limits set out in the document can be ascertained.
- g) Can copies of the River testing results over the past 5 years be released so that any deviations from the permitted limits can be established
- h) Can South West Water confirm that the Shire Hall Moor facility has complied with all discharge consents over the past 5 year period
- i) Can South West Water please confirm given the perceived inadequacies listed above that the facility is fit for purpose and that it can accommodate safely the new connections that will be required to accommodate existing planning consents
- j) Can South West Water please advise if there are plans in place to upgrade/modify the site to assure compliance.

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.

This information is enclosed.

Most sewerage systems are "combined" in nature, this means that surface water from roofs, drains, roads etc. enter the sewers during wet weather, taking up capacity.

Given the capacity of the sewerage network is finite, in the absence of combined storm overflows acting as pressure relief valves, sewage would surface the network into homes, gardens and public spaces.

Operating in times of wet weather storm overflows (SOs) provide a controlled method of discharging a very dilute combination of semi-treated foul and surface water, under conditions when the receiving water dilution is also increased as a consequence of rainfall.

SOs perform as designed and within the terms of their permits from the Environment Agency (EA). The frequency of operation is dependent on the nature of the sewerage network, the receiving water's quality targets, the discharge location and its dilution and dispersion.

Traditional solutions to reduce storm overflow operation involve building storage tanks or bigger sewers to capture more of the storm flows, but this is becoming less effective with greater extremes/intensity of storms.

Therefore, SWW have been delivering our "Downstream Thinking" (DST) programme, where we remove or reduce storm water in the combined sewers. This involves wider partnership working on drainage as surface waters in our sewers can be a result of domestic surface water, fluvial flooding or highways drainage problems.

SWW have published an information document about storm overflows which explains why they are needed and when they operate. This can be accessed here [storm overflows](#), the document provides the context for the data that you have requested.

SWW also have a suite of business plans and environmental plans that you may find of interest, these can be accessed here [business plans](#).

As rainfall increases along with 20% increase in population and 50% increase in tourism, demand on our network has increased. SWW is absolutely committed to improving river quality and we have a proven track record of improving the bathing beaches here in the South West with over 97% of waters now rated as good or excellent compared to c28% in 1991.

All SWW's discharges are made under permits issued by the Environment Agency (EA), the permits define the circumstances when the overflows can activate.

The published 2020 data you refer to relates to Coulson Park sewage pumping station, which has two discharge points near Shirehall as described in the attached permit document, the storm overflows are activating in line with their design and the permit. There were 130 storm discharges recorded but event duration monitoring (EDM) equipment does not record volumes.

Please also find attached the permit for the Lostwithiel sewage treatment works. This permits the release of final effluent (FE) only from the site. The site is protected from high storm volumes by the permitted overflows from the Coulson Park pump station as described above.

Responsibility for river water quality and sampling lies with the Environment Agency. SWW is however obliged to sample the FE from the works, as prescribed in the permit for the site.

From a total of 96 operator self-monitoring (OSM) and 36 urban wastewater treatment regulations (UWWTR) samples collected since the 1st January 2015, 3 non-compliances (red text in table below) and 3 exceedances have been recorded. The terms of the permit define what is an "allowable" exceedance sample and over what period.

	<b>OSM BOD (mg/l)</b>	<b>OSM Suspended Solids (mg/l)</b>	<b>OSM Ammonia (mg/l)</b>	<b>UWWTR BOD (mg/l)</b>	<b>UWWTR COD (mg/l)</b>
16 <sup>th</sup> May 2017		43			
23 <sup>rd</sup> April 2018	89	138	22	70	176

The site has been compliant with the permitted limit of 1079 m<sup>3</sup>/day dry weather flow and current capacity is within design capacity, as evidenced by good compliance data even at peak load.

The site currently has capacity, as indicated by the lack of performance failures. During the period 2025-2030, SWW will be investigating the potential to further enhance the capacity to cater for longer term predicted growth.

The EA are responsible for the designation of bathing waters and river quality. The River Fowey is not a designated bathing water, as such there is no expectation that it should meet any microbiological standards associated with swimming.

Any swimming at this location would be classified as 'wild swimming' and the guidance on the Outdoor Swimming Society's or Wild Swimming web site should be considered before undertaking wild swimming (<https://www.outdoorswimmingsociety.com/> and [www.wildswimming.co.uk](http://www.wildswimming.co.uk)).

Following heavy rainfall in a catchment water quality can be temporarily reduced by many factors not just storm overflows, these include rainwater running off roads and roofs, run-off from agricultural land, sewage from privately owned treatment works and septic tanks, boats or even animals such as dogs or seabirds on the foreshore. Storm overflows account for just 1% of the reasons for rivers in our region not achieving good ecological status.

As part of SWW's Green Recovery Plan we are undertaking an "Inland River Bathing Water" pilot on the Dart and Tavy rivers, to test the implications, costs, and benefits of achieving bathing water designation and also to deliver specific asset enhancements.

The table below shows the two pollution incidents over the last 5 years.

Pollution Date	Location	EA Impact Category
2021-02-19 23:27	Coulsons Park Pumping Station	4
2016-12-22 16:48	Lostwithiel Sewage Treatment Works	3

SWW would be happy to engage further with the Town Council and the local community by providing a speaker who will be able to further explain all the work SWW is undertaking in improving the environment and also what local groups and individuals can do to support this work. Please contact us if you would like us to participate in a meeting.

Thank you for your interest in this topic.

### 3. Further Queries

Should you have any questions, please contact us at [finreg@southwestwater.co.uk](mailto: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 Lisa Gahan (Regulatory Director) who can be contacted by e-mail on [EIRinternalreviews@southwestwater.co.uk](mailto:EIRinternalreviews@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](http://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