ESCAPE response to the 2025 Water Cycle Study

Summary

Government guidance states, '*When prepared at an early stage of plan-making, water cycle studies can provide evidence that local authorities (or groups of local authorities) can use to make sure their plans are sound.'* (https://www.gov.uk/guidance/water-cycle-studies)

ESCAPE considers the Water Cycle Study has been rushed, is incomplete and inaccurate and should not be used to inform planning decisions in the region until further work is undertaken to address issues raised.

Councillors should direct officials to write to Government setting out a revised time frame due to delays in the production, lack of cooperation from South West Water in gathering evidence for this report and insufficient time to fully consider the implications of this report.

Between 2011 (when the last water flow calculations were made) and 2021 the population of East Devon increased by 13.9%. At this rate by 2031 there will be an additional 41,000 people in our area, creating an additional demand for water of over 6m litres each day.

Without time to address these issues planning decisions will not be sound and further damage to our precious rivers and sea is inevitable.

On behalf of ESCAPE 06/01/2026

Background

ESCAPE want to draw attention to concerns about the Water Cycle Study report. There are **gaps in the evidence, unanswered questions and simple errors.**

The report fails to expose the full extent of SWW's poor performance which moved the district council to pass the vote of no confidence in SWW and the leader of the Council declared a civil emergency (3 Sept 2024 https://www.facebook.com/GiffGoffCrawford/videos/534107768986818?idorvanity=827627338270238)

From the experience of the last few years it is obvious that the current network is not coping. Storm overflows regularly spill untreated sewage into our water with only modest rainfall yet this is not reflected in the report.
Eg 1 - 1 November 2025 1 hr spill from Hartopp CSO Exmouth following 3.4mm of rain in an hour and approx 2 mm rainfall over the previous 48 hours

Eg 2 - Following rain on the 5th December 2025 all CSOs in Exmouth started to overflow with Maer Lane STW starting at 17:31. Over the following two days Maer Lane continued to overflow for 2,567.32 minutes - 43 hours out of 54.5 hrs (80% of the time) to the end of 7th December. During this same period of time and with similar rainfall levels the Countess Wear (CW) STW spilled for just 21/2 hours. The water cycle study reports that CW is over capacity and Maer Lane is 8% under capacity.

Other gaps in the report's evidence include:

- SWW **itself** identifies *insufficient sewer capacity* as the reason for the high number of storm overflows at nine East Devon treatment works. (EDM Report 2024). This includes Maer Lane and Countess Wear which both have in excess of 60 spills per year. SWW identifies the reason as '*hydraulic capacity*' which the Environment Agency defines as, '... **insufficient capacity**

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(conveyance or storage) in the sewer network to cope with the wastewater flow plus typical rainfall entering the sewer network.'

- There's nothing on the poor performance that resulted in the Ofwat investigation notice and £25m settlement. This identified serious permit breeches between 2020 - 23 resulting in excessive use of storm overflows from treatment works and network CSOs. This includes Maer Lane STW. (https://www.ofwat.gov.uk/enforcement-case-in-south-west-waters-management-of-its-sewage-treatment-works-and-sewerage-networks/)

- There's no mention of the high pollution-incident rate. SWW has the most with more than double the national average. (EPA 2025). The average number of pollution incidents across England in 2024 was 47. SWW recorded 108. In 2023 the figures were 36 and 110. (The figures are normalised taking the actual number of incidents per 10,000 km of sewage pipe)

- There is no examination of the impact of **not** building the Cranbrook treatment works — this was central to the 2010 Water Report. (Countess Wear is over capacity as a result). The 2010 report calculated that the new Cranbrook treatment works, which had planning permission granted, would treat just under 1,000 cubic metres of sewage per day rising to just under 4,000 by 2026 as population increased. This facility was never built so sewage was treated at Countess Wear. This has a major implication for all of East Devon and the new town planned in the area.

- The final page of the Water Cycle study sets out considerable difficulties in engaging with SWW to obtain data. When published SWW told the Sidmouth Herald it 'did not recognise the data' https://www.sidmouthherald.co.uk/news/25631736.south-west-water-a-lot-prove-sewage/

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This missing evidence points to a network already under severe strain.

There are questions that warrant further examination:

- Maer Lane was approaching capacity in 2010 yet the consented flow was increased by 30% without any upgrade to the network. This effectively reduces capacity to deal with rainfall. Is this the reason for the increase in spills and duration?
- Local trends are not compared with regional patterns; Spills in Exmouth are 79% higher and duration has doubled since 2020. Why are these so far above regional averages? (EDM data see below)

SWW regional performance storm overflows (EDM return)

	2020	2021	2022	2023	2024
Spills	41,247	42,484	37,649	58,249	56,173 →
Spills / CSO	39	39	28	43	41 →
Duration (hrs)	367,017	351,785	290,271	530,737	544,416 ↑

Exmouth's associated* storm overflows (EDM return)

*Phear Park, Hartopp, Imperial Road and Maer Road

	2020	2021	2022	2023	2024
Spills	125	157	95	214	228 ↑
Spills / CSO	31	39	24	54	57 ↑
Duration (hrs)	1068	1369	651	1983	2277 ↑

- Why are our rising mains failing, in some cases after less than twenty years? In October the rising main section at the top of Phear Park burst. This was installed in 2017.

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- The report assumes residents will reduce water use by almost a third. Given that current use is over 150 litres a day (Ofwat, Water UK), how do we achieve these reductions? The 2010 report also predicated its calculations on reduced consumption by the public yet since the 1960's consumption per person has remained stable.

The report would be more robust with answers to these questions.

There are simple mistakes:

- Unlike the Otter and Axe catchments, the Exe has no summary or investment detail in the report, despite Maer Lane having the most trigger indicators in East Devon. Page 50 of the report gives a detailed summary and investment report for the Otter and Axe but not the Exe. The report is complied using AI so further checking is required.

- The report gives the impression that work in Exmouth is complete, but it will not be finished and delivering benefits until at least 2030. Plans are not yet in place to double the treatment capacity at Maer Lane yet this is promised to be complete by March 2028.

- SWW has admitted errors in EDM data yet Maer Road Douglas Avenue overflow was sealed years ago but is included in the report. All spills from Maer Road were reported against permit 200125 until ESCAPE discovered this had been sealed a number of years ago. SWW admitted this was an error but did not correct the data so the spill averages for permit 200126 are around half what they should be. This appears in the 2025 study.

ESCAPE considers the Water Cycle Study is incomplete and inaccurate and should not be used to inform future planning development in the region until further work is undertaken to address issues raised.

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