

Report to: Strategic Planning Committee



Date of Meeting 3rd March 2026

Document classification: Part A Public Document

Exemption applied: None

Review date for release N/A

East Devon Water Cycle Study

Report summary:

The East Devon Water Cycle Study was reported to Strategic Planning Committee on the 25th November 2025. Members agreed to consult on the study alongside the second Reg 19 consultation on the Local Plan but sought a further report following consultation to “enable discussion of its implications with the benefit of responses from consultees and further engagement with South West Water”.

This report summarises the findings of the study and the responses received through the consultation including those from South West Water, Natural England and the Environment Agency. The report then makes recommendations about how this work should be taken forward.

Is the proposed decision in accordance with:

Budget Yes No

Policy Framework Yes No

Recommendation:

1. That Members note the Water Cycle Study and the comments received through the Reg 19 consultation.
2. That Members note the further work that is on-going with South West Water and statutory consultees to develop a common understanding of the position in terms of water infrastructure in the district and the impacts of the local plan on water resources and how and when these will be addressed.

Reason for recommendation:

To ensure Members are aware of the findings of the Water Cycle Study, the comments received from consultees on the study and the implications for the Local Plan.

Officer: Ed Freeman – Assistant Director – Planning Strategy and Development Services

Portfolio(s) (check which apply):

- Assets and Economy
- Communications and Democracy
- Council, Corporate and External Engagement
- Culture, Leisure, Sport and Tourism
- Environment - Nature and Climate
- Environment - Operational
- Finance

- Place, Infrastructure and Strategic Planning
- Sustainable Homes and Communities

Equalities impact Low Impact

Climate change Medium Impact

Risk: Medium Risk;

Links to background information [ccf-001-the-east-devon-water-cycle-study.pdf](#)

Link to [Council Plan](#)

Priorities (check which apply)

- A supported and engaged community
 - Carbon neutrality and ecological recovery
 - Resilient economy that supports local business
 - Financially secure and improving quality of services
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Background

Strategic policies in the local plan should set out an overall strategy for the pattern, scale and design quality of places and among other things address infrastructure required for water supply and waste water as well as conserving and enhancing the natural environment. In order to do this we are required to co-operate with relevant bodies such as Natural England, Environment Agency and infrastructure providers such as South West Water.

The National Policy Statement for Waste Water was published in 2012 and primarily sets out how nationally significant waste water infrastructure should be dealt with and thus is not directly relevant to the role of EDDC. It does however contain a section on generic impacts which is relevant to all waste water infrastructure and highlights a range of issues to consider when determining applications for such development including, water quality and resources, odour, flood risk, biodiversity and geological conservation etc.

The Planning Practice Guidance contains a section on water supply, wastewater and water quality. It highlights the legislative framework and the role of river basin management plans which set out the key issues for the water environment and how these are to be tackled. These are produced at a regional level and so are quite broad and high level. The issues highlighted are also picked up in the PPG itself in relation to Local Plan production and relate to:

- Infrastructure (water supply and wastewater) – This could include identifying suitable sites for new or enhanced waste water and water supply infrastructure, considering the impacts of that on existing and proposed development in the vicinity of such infrastructure whether existing or proposed and phasing new development so that water and wastewater infrastructure will be in place when and where needed.
- water quality – This could include locating potentially polluting development away from the most sensitive areas, consider the type or location of new development, whether measures to improve water quality, for example sustainable drainage schemes, can be used to address impacts on water quality in addition to mitigating flood risk.

- wastewater – This could involve considering the sufficiency and capacity of wastewater infrastructure, considering circumstances where private treatment works may be accepted and considering the capacity of the environment to receive effluent from development without preventing relevant statutory objectives being met.
- cross-boundary concerns – Water supply and water quality issues often cross boundaries and can only be addressed in partnership with neighbouring authorities and other stakeholders.
- strategic environmental assessment and sustainability appraisal – These are tools for assessing the impacts of the proposed plan against objectives such as preventing deterioration of current water body status, taking climate change into account and seeking opportunities to improve water bodies.
- habitats regulations assessments – These are required under the habitat regulations and are a process for assessing the impacts of projects on protected habitats and species including those related to water bodies.

The PPG also refers to evidence documents that can be produced to help to consider these issues and find solutions. These include production of a water cycle study and a drainage strategy for the area. “A water cycle study helps organisations work together to plan for sustainable growth. It uses water and planning evidence to understand environmental and infrastructure capacity. It can identify joined up and cost effective solutions, that are resilient to climate change for the lifetime of the development.

The study provides evidence for plans and sustainability appraisals and is ideally done at an early stage of plan-making. Local authorities (or groups of local authorities) usually lead water cycle studies, as a chief aim is to provide evidence for sound plans, but other partners often include the Environment Agency and water companies”. A drainage strategy according to the guidance “can be prepared by water and sewerage companies and sets out how they intend to deliver statutory drainage functions and meet customer needs within a particular catchment”.

Below is a summary of the Water Cycle Study now produced by Haskoning and available at: [ccf-001-the-east-devon-water-cycle-study.pdf](#). Although the final report has been published late in the process the work has been ongoing in parallel with plan production and has informed the plan as it has evolved.

Introduction

The East Devon Water Cycle Study (WCS), commissioned by East Devon District Council (EDDC) and prepared by Haskoning, is designed to support the new East Devon Local Plan (2020–2042). Its primary aim is to ensure that planned development—particularly significant housing growth—can be accommodated sustainably, without compromising water resources, wastewater management, or the district’s environmental quality. The study provides an evidence base for policy making, site selection, and sustainability appraisals, focusing on the integration of water management and planning to deliver sustainable growth.

Study Objectives

- Assess whether there is sufficient water supply and wastewater capacity for new developments.
- Identify requirements for maintaining and improving water quality.

- Protect natural capital (e.g., rivers, land, biodiversity).
- Inform planning policies on biodiversity, climate change adaptation, flood risk, and sustainable drainage.

The WCS also considers compliance with key environmental legislation, including the Water Environment Regulations (WER) and the Habitats Regulations, and draws on data from stakeholders such as the Environment Agency, South West Water (SWW), and Natural England.

Legislative and Policy Framework

The WCS is framed by requirements from the Water Environment Regulations (WER), National Planning Policy Framework (NPPF), Building Regulations, and the Urban Waste Water Treatment Regulations. These statutes collectively require that development does not cause deterioration in water body status or prevent the achievement of ecological objectives.

Local authorities are encouraged to set higher water efficiency standards (e.g., 110 litres/person/day for new homes) and to work closely with water companies and the Environment Agency in the planning process.

Water Resources and Supply

Water Cycle Study Summary

The study identifies that the district's water is supplied by SWW's Wimbleball Water Resource Zone (WRZ), covering all potable supply and wastewater treatment. The WCS identifies significant pressures on both surface and groundwater resources, particularly in the Otterton, Fairmile, and Fenny Bridges Water Resource Management Units (WRMUs), where further abstraction is unlikely to be permitted.

Baseline supply-demand analysis indicates that, without intervention, the WRZ would enter deficit by 2024 and remain so until 2050. However, SWW's Final Plan, with new infrastructure (e.g., Cheddar 2 Reservoir, Whitecross Distribution Scheme), demand management, and leakage reduction, is expected to maintain supply-demand balance. Climate change and population growth will continue to exert pressure, requiring stringent water efficiency and adaptive management.

Wastewater Collection, Treatment, and Water Quality

Water Cycle Study Summary

The study notes that wastewater is collected and treated across multiple WwTWs, with capacity and compliance regularly assessed. Several WwTWs—including Colyton, Honiton, Fluxton, Feniton, Otterton, Maer Lane, and Dunkeswell—are projected to exceed or approach their permitted Dry Weather Flow (DWF) limits post-development, necessitating upgrades or phased development.

Major rivers in East Devon currently fail to meet physio-chemical standards for phosphorus, ammonia, and biochemical oxygen demand (BOD). New development will increase pressure on these systems, with RQP (River Quality Planning) modelling and load standstill calculations indicating that some WwTWs will require permit adjustments or infrastructure enhancements to prevent ecological deterioration.

Critical investment is required at Exmouth Maer Lane and Countess Wear WwTWs to address hydraulic stress, sewer flooding, and future capacity needs. A new WwTW is required to address future pressures on Countess Wear with SWW progressing a project to deliver this although no location has been identified.

Environmental and Biodiversity Implications

Water Cycle Study Summary

East Devon contains several nationally and internationally designated conservation sites (SACs, SPAs, Ramsar, SSSIs), many of which are hydrologically sensitive. The WCS finds that increased nutrient loading from development poses significant risks to key sites, particularly the River Exe Estuary, River Axe, and Otter Estuary.

The study recommends that future Habitat Regulations Assessments (HRAs) pay special attention to the vulnerability of these sites, and that monitoring and further testing be carried out to track nutrient and contaminant levels. Development should integrate biodiversity enhancements, such as constructed wetlands and sustainable drainage systems, and avoid adverse impacts on critical habitats.

Key Recommendations

- Adopt the lower water efficiency standard of 110 litres/person/day for new development.
- Monitor and strictly regulate new abstractions and wastewater discharges.
- Phase development to match infrastructure upgrades and capacity increases.
- Where new developments are within the scope of the Environmental Impact Assessment (EIAs) Regulations ensure that they include assessment of their impacts on water services and protected habitats.
- Integrate biodiversity-friendly design and restrict development in sensitive coastal and riverine areas.
- Continue stakeholder collaboration (EDDC, SWW, Environment Agency, Natural England) to ensure sustainable growth and environmental protection.

The WCS underlines the need for an integrated, evidence-based approach to development, balancing population and economic growth with the long-term sustainability of water resources, infrastructure, and the natural environment.

Conclusion

The East Devon Water Cycle Study provides a comprehensive framework for aligning local development with sustainable water management. Its findings and recommendations are intended to inform the Local Plan, ensuring that future growth is achieved without detriment to water supply, wastewater infrastructure, or the district's unique environmental assets.

Reg 19 responses to the Water Cycle Study

We are still analysing comments received through the consultation and comments on this study have been made in various places throughout the consultation materials however the key comments that we have identified so far in relation to the Water Cycle Study from those commenting on the plan aside from SWW and statutory consultees are as follows:

- The WCS identifies limited wastewater treatment capacity in several settlements, and respondents questioned whether the Local Plan reflects the capacity constraints the study sets out.
- People noted that the WCS contains uncertainties and references to areas where further modelling or assessment is still required.
- Several respondents highlighted that the WCS points to the need for significant upgrades to wastewater treatment works and sewer networks, and they questioned how and when these upgrades would be delivered.

- Respondents drew attention to WCS findings relating to potential impacts on water quality, including the risk of deterioration in sensitive catchments and the implications for protected sites.
- Some representations stated that the WCS's findings imply constraints that should be explicitly addressed in Local Plan policies, especially regarding the feasibility and timing of development.

Further details will be included in the feedback report to be presented to the May meeting of the committee.

South West Water Comments on the Water Cycle Study

South West Water Limited (SWW) provides a detailed response to the Regulation 19 Draft Local Plan for East Devon, addressing water and wastewater infrastructure, environmental protections, and planned investments to support growth and sustainability.

- **Support for Net Zero and SuDS:** SWW endorses policy requirements for achieving Net Zero through sustainable drainage systems (SuDS) and nature-based solutions, suggesting design guides for developers and promoting green roofs and walls for brownfield sites.
- **Water Efficiency and Harvesting:** SWW supports policies mandating a minimum water efficiency of 110 litres per person per day in new residential developments and encourages inclusion of water harvesting and recycling techniques in development proposals.
- **Urban Tree Canopy Policy:** The utility backs policies aiming for a 30% urban tree canopy cover in major developments to mitigate urban heat island effects and reduce water resource strain amid climate change.
- **Wastewater Treatment Capacity:** SWW highlights limitations in the Water Cycle Study's assessment, emphasizing that treatment capacity planning is dynamic, regulated through five-year Asset Management Plans (AMPs), and includes ongoing investments to manage population growth and environmental compliance.
- **Hydraulic vs Biological Capacity:** The response clarifies that hydraulic capacity affects storm overflow performance, whereas biological capacity relates to treatment efficacy, noting the Water Cycle Study inadequately considers biological capacity.
- **Recent and Planned Investments:** SWW details recent upgrades at treatment works such as Fluxton, Ottery St Mary, Tatworth, and Countess Wear, and outlines AMP8 investments for wastewater treatment and storm overflow reduction across East Devon to support growth and environmental targets.
- **Storm Overflow Improvements:** The company reports substantial investment reducing storm overflow discharges, including upgrades in Exmouth and Budleigh Salterton, with plans to meet Defra's target of ten spills per year by 2040, ahead of the 2050 national goal.
- **Water Resources Management:** SWW references its Water Resource Management Plan 2024 for the Wimbleball zone, including demand management targets and supply schemes like the Whitecross distribution and Cheddar 2 reservoir to ensure supply-demand balance and climate change resilience.

- **Recommendations for Water Cycle Study Update:** SWW recommends updating the Water Cycle Study to reflect the water industry planning process, recent and planned investments, regulatory frameworks like WINEP, the limitations of dry weather flow as a capacity measure, storm overflow improvements, and supply schemes to provide a comprehensive and transparent assessment.

Statutory Consultee Comments on the Water Cycle Study

Both the Environment Agency and Natural England identify issues with the current Water Cycle Study as set out in Appendix 1. The Environment Agency in particular raise a large number of issues, however the majority are minor and do not directly affect local plan content. Their substantive comments are set out below in summary with a RAG rating and officer comment provided for each:

Water Resources

Comment	RAG rating	EDDC Commentary
Only considers water availability and does not consider if water supply infrastructure is sufficient - existing water treatment works or pipelines may require upgrading	Yellow	Further information will need to be sought from SWW to address this issue.
SWW need to confirm if the modelling for WRMP24 included needs arising from Marlcombe	Yellow	Further information will need to be sought from SWW to address this issue.
No mention of future industrial water use such as for hydrogen gas generation for fuel or cooling in data centres	Green	The Local Plan contains no specific proposals for industrial activities with particular supply needs and so this is not considered to be an issue.
There is no reference to the risks associated with proposals for the cheddar 2 reservoir providing additional water to the Wimbleball water resources zone. What if this doesn't happen?	Green	Risks and alternative options are assessed in SWW WRMP24
References to the water availability in waterbodies in East Devon from abstraction and water resources risks at Otterton, Fairmile and Fenny Bridges are not correct and would only apply if new development was not supplied by SWW	Green	It is not clear what is meant here but the expectation is that developments will be served by SWW.
Lack of detail about where water supply for new development will come from particularly Marlcombe	Yellow	Marlcombe is not additional but is the chosen strategy of EDDC for accommodating a proportion of the planned growth in the district. The whole of East Devon is served by Wimbleball WRZ and in district groundwater

		sources, so it is not clear why Marlcombe is causing specific concerns.
The risk of increased sewage discharges into the Lower River Exe and Exe Estuary leading to a deterioration in water quality and impacting on migrating Salmon is not considered.		Atlantic salmon are a protected species that is endangered and known to be found in the Exe. We will need a response to this issue.
Increases in sewage discharges in the River Otter could affect ground water quality but this is not identified in the water resources elements of the study.		Honiton WWTW shown as exceeding, Otterton less than 10% and Dunkeswell less than 20% headroom so risk of discharges particularly from Honiton, however SWW comments suggest Honiton has capacity due to recent upgrades. Need to check.
Para 4.1.2 contains factual inaccuracies in relation to the East Devon Abstraction Licensing Strategy as there are no winterbournes in East Devon and the SWW abstractions are in the middle and lower otter, not the upper.		Unfortunate error but does not appear to affect overall findings.
Para 4.1 indicates that the SWW Wimbleball WRZ boundary is the black line on Fig 4.1 but this includes Starcross and Dawlish which are within the Roadford WRZ.		This is an error in the text but the key to Fig 4.1 clearly shows the black line as being the Exe catchment rather than the Wimbleball WRZ boundary.
It is not clear whether the delivery date of 2035 for Cheddar 2 proposals is early enough to meet anticipated demand in the next 10 years including taking into account Whitecross distribution improvement which is not due until 2030.		Need to check with SWW but their comments on the plan suggest that the Cheddar 2 proposals and Whitecross distribution improvement would be sufficient.

Water Quality

Comment	RAG rating	Commentary
River Quality Planning (RQP) model runs should have been completed for all freshwater sites not just those with less than 10% headroom post growth.		There doesn't appear to be anything in the EA guidance on Water Cycle Studies that prescribes the approach to assessment being set out in their comments.
None of the input data used or assumptions made for the RQP runs and Dry Weather Flow (DWF) projections were provided to assess the validity of the conclusions.		I assume this is data from SWW that was provided under the data sharing agreement and so is not something we can publish but need to

		check. In any event surely it is available to the EA.
Event Duration Monitoring (EDM) data was inconsistently analysed throughout the study and waterbody status was not properly considered in the results. A separate section for the River Axe would be helpful due to the more stringent quality targets given the nutrient neutrality issues.		<p>This comment does not appear to make sense as water body status is assessed in section 6 of the WCS.</p> <p>The River Axe is covered albeit not in its own section.</p>
Unclear what engagement with SWW has taken place. It would be useful to understand where SWW identify current and future capacity issues.		SWW note that there was only 'limited engagement' with them and as result they do not fully agree with the conclusions. The SWW response provides a detailed breakdown of how they understand current and future capacity issues.
Fails to reference risks to bathing waters and shellfish waters and potential mitigation measures		Exceeding permitted spills in each bathing water season or for shellfish waters is identified as a risk in sewer catchments but acknowledge that no assessment is included in the WCS.
Kilmington STW modelled as green: limit deterioration to 10% but it discharges into a failing HD site (Axe?) so would not offer a 10% deterioration here.		SWW comments refer to recently completed and proposed improvement schemes at Kilmington that may help to alleviate EA concerns.
WCS should take into account the potential requirement for new permit limits because of growth or any urban waste water treatment directive requirements if population equivalent thresholds are crossed at an STW.		There is no specific reference to permit limits in guidance but this requires further assessment and a response to the EA.
It should explicitly state the requirement for developers to offset nutrients in the Axe catchment due to nutrient neutrality issues.		Noted but issue well understood and acknowledged in the local plan and other supporting evidence documents including HRA.
It doesn't reference the environment destination investigations in AMP8 that may affect water availability from AMP9 onwards.		It is understood that this comment relates to investigations to identify necessary reductions in water abstraction to maintain healthy habitats. This requires further investigation and comment.

In general, there is no consistent approach to discussing the condition of infrastructure across East Devon and the potential impact of increased growth, risk to the environment, mitigation etc.		It is not clear what is meant here. Maer Lane, Exmouth and Countess Wear were singled out because of known issues with these sites. This is not an inconsistency simply a greater level of detail in commentary where there are known issues.
Little discussion around EDM data or lack of capacity within networks beyond dry weather flows		Noted – This is also raised by SWW who raise concerns that the study is overly reliant on permitted dry weather flow data without considering biological treatment capacity.
The study concludes that the developer needs to provide information on impacts, but this will be too late. Granular detail is needed now.		The comment is noted but such granular detail is not available now and not necessary for plan production.
Within the study or local plan there should be an indication that local plan policies will align with SWW plans for upgrades and improvements.		Strategic Policy AR02 is clear on this point where it says “Planning permission will not be granted for any proposal which, because of inadequate provision of water services or inadequate or untimely provision of foul water and surface water drainage and disposal, would: 1. cause pollution to the water environment, including coastal waters 2. result in the deterioration of the ecological status of a water body 3. overload the sewer network, or 4. result in an increase in flood risk at the site or elsewhere.” The plan itself cannot go any further than this.
Its recommendations need to align with DWMP measures and timescales and where this is not the case set out how this will be resolved.		We are working with SWW to understand how upgrades and improvements will align with build out rates and ensure alignment where possible.
The WCS does not contain all available data on water quality and so conclusions on water quality including those within the Habitats Regulations Assessment (HRA) are premature.		This is a significant issue raised by Natural England given the legal compliance issues raised by the Habitat Regulations.

Overall, the comments of statutory consultees suggest that a revised WCS should:

- Correct data errors
- Re-run models with more robust inputs
- Incorporate planned investment
- Align fully with WRMP24 and DWMP where possible

- Demonstrate clear solutions for Marlcombe's water supply and wastewater treatment
- Provide transparent and evidence-led conclusions on water quality and infrastructure capacity

At the time of writing the comments of consultants Haskoning, who produced the Water Cycle Study, are being sought and meetings are being held with South West Water to obtain further data and information to respond to the concerns and issues raised. The intention is to update and amend the study to address the concerns raised where possible.

Although the number of issues raised are substantial many of them are very detailed and minor points of clarification or correction, however it is noted that some comments are more fundamental and require further work to address. It is not however anticipated that such changes would lead to any material changes to the Local Plan itself which was produced alongside production of the Water Cycle Study and informed by the emerging work of the study. Other constraints mean that any fundamental changes in approach are not possible and should not be necessary while the policy provisions of the plan regarding water efficiency measures, SuD's and policy safeguards such as through Strategic Policy AR02 would prevent detrimental impacts on the water environment. It is however important that the plan is accompanied by a robust and accurate water cycle study as evidence and this is where this work needs to be at prior to plan submission.

It is important to note that we have limited control in this space as we have no powers to make SWW deliver infrastructure or to do so in any specific timescale. The licensing of discharges are within the power of Environment Agency while SWW investment plans are for OFWAT to consider. Our control is limited to the development coming forward in the district and when this comes forward in relation to the infrastructure needed. As a result the Grampian conditions currently being used to control the timing of delivery of homes will continue to be a feature of decision making moving forwards, however it is hoped that the final Water Cycle Study will provide a clear evidence base to confirm/test the responses from South West Water and to help align delivery of housing and water infrastructure.

It is hoped that by the time of plan submission the substantive issues raised can be resolved and a statement of common ground entered with the Environment Agency and Natural England to support the examination of the plan.

Financial implications:

There are no direct financial implications identified within the report. (AB-17/02/2026)

Legal implications:

There are no direct legal implications identified within the report. (DH/002533-19/02/2026)

APPENDIX 1 – Statutory Consultee comments on the Water Cycle Study

Natural England

PB01: Water Quality and Water Cycle Study

Natural England has concerns that the current Water Cycle Study (WCS) does not demonstrate a sufficiently robust evidence base to rule out adverse effects on the integrity of international sites. The HRA (November 2025) identifies Water Pollution and Hydrological Changes as priority threats to the Exe Estuary. However, the HRA's conclusion that there will be no "Adverse Effect on Integrity" (AEOI) relies on the assumption that the WCS is fully complete.

The WCS does not, by its own admission, contain all available data on water quality. Consequently, the conclusions of the Habitats Regulations Assessment (HRA) regarding water quality may be premature. Appendix D, Page 158 of the WCS states:

“SWW has carried out SAGIS modelling, which provides a broader view of water quality across catchments and allows for assessment of multiple treatment works in close vicinity on the same watercourse. SWW has neither shared the inputs of their model nor any clear outputs, which does not allow for comparison with the RQP modelling. RQP focuses on the impact of specific discharges, while SAGIS provides a broader, integrated view of water quality across entire catchments. RQP is used for detailed discharge assessments, whereas SAGIS supports strategic catchment planning and regulatory compliance.

The data provided by SWW did not provide clarity on the comments initially raised. As such, the additional data provided by SWW following consultation on the WCS report was not incorporated into a revised version of the WCS”

The Environment Agency will be able to better advise on the implications of this. But the lack of certainty around water quality alongside the high levels of proposed development could lead to direct risks for protected habitats. Natural England advises that where there is uncertainty the precautionary principle required under the Habitat Regulations should be applied.

Environment Agency

Water Cycle Study

We are pleased to see the submission of the Water Cycle Study (WCS) (Ref.: -HAS-XX-ZZ-RP-Z-0001 dated 18th November 2025 by Haskoning). However, given the timing of the submission, we are not confident that the findings of the report have been sufficiently embedded into the plan draft.

Furthermore, there are some key deficiencies of the document, which we outline below. These should be addressed in order for your authority to make informed decisions on the planning policies, allocated development and, especially the proposed new town of Marlcombe.

Water Resources

The water resources section of the WSC only considers water availability and does not consider if water supply infrastructure is sufficient for the proposals in the local plan. This matter should be part of the study because existing water treatment works or pipelines may require upgrades to provide the additional water quantity required. New infrastructure will definitely be required for

Marlcombe new town. The Infrastructure Delivery Plan includes some clean water infrastructure projects but these need to be brought into the narrative in the WSC.

The South West Water (SWW) Water Resources Management Plan 24 (WRMP24) was prepared in 2021 – 2022 and it is not clear if the anticipated population growth in East Devon, including the new town of Marlcombe, was included fully in the future water needs for the modelling supporting the WRMP24. This should be confirmed by SWW and included in the WSC document.

The WSC only considers housing, agriculture and amenity. There is no mention of future industrial water use in East Devon. With the increasing interest in the development of energy generation to achieve the Government's ambition of net zero in 2030 and expansion of data centres. The local plan does not appear to have considered this potential for water use. Water is key to proposals for hydrogen gas generation to use as fuels and data centres can choose to use water for cooling.

The approach the water companies take for the statutory 25-year water resources management plans is an adaptive approach, recognising that the plans will need to flex and adapt. Although Cheddar 2 reservoir is in the preferred plan to provide additional water to the Wimbleball water resources zone, this is not guaranteed and the WRMP24 includes alternative scenarios. The WSC does not include reference to this uncertainty and subsequent impacts on the plan, nor does it draw any conclusions regarding how this should be recognised as a risk.

The reference to the water availability in the waterbodies in East Devon from our abstraction licensing strategy and the conclusions drawn from this regarding water resources risks at Otterton, Fairmile and Fenny Bridges are not correct. These water resources risks would only apply if the new developments were not supplied by South West Water.

Overall, it is disappointing that there is a lack of detail in the information to explain where the supply of water for the new developments, especially Marlcombe, will come from. The granularity is not provided to demonstrate, for example, that there is sufficient water for Marlcombe and also for Honiton. There are infrastructure constraints within the water supply network which are not explored or considered by the WSC.

Increases in sewage discharges into the lower River Exe and Exe Estuary, causing a resultant deterioration in water quality in the receiving water, have the potential to impact on salmon which need to migrate to the River Barle SSSI in the upper Exe catchment. Salmon are a notified species for the SSSI. This risk is not considered in the document.

Increases in sewage discharges in the River Otter and the risks identified for river water quality could have consequences for groundwater quality and hence, the raw water abstracted by South West Water in the boreholes in the lower Otter. This connection between the Water Quality and Water Resources elements of the WSC is missing and needs to be considered.

Paragraph 4.1.2 'East Devon Abstraction Licencing Strategy' contains factual inaccuracies. It references "*several seasonal winterbournes which dry up for period along some stretches. SWW abstracts significant volume of water for public water supply from groundwater sources in the upper and middle reaches.*" However, there are no winterbournes in East Devon, and the SWW abstractions are in the middle and lower otter, not the upper.

The map below is also incorrect. Paragraph 4.1 states that the SWW Wimbleball WRZ boundary is the black line on the map below (figure 4.1 in the WCS). However, the area around Starcross and Dawlish is within the Roadford WRZ. A map showing the correct boundary would be available from SWW. The WCS is correct in saying that East Devon is within Wimbleball WRZ, so this is not a material change required to the report, merely a correction of background information.

Figure 1. – Figure 4.1 in the WCS

Overall, in regards to water resources, the timing of delivery of new dwellings is important when considered against the SWW WRMP24. The Cheddar 2 reservoir proposal is planned to be ready by 2035 but there is considerable risk associated with this delivery date due to the significant size of the scheme. It was not clear in the WCS if a delivery date of 2035 for Cheddar 2 was considered early enough to meet anticipated demand in the next 10 years or if this is a risk. Similarly, Whitecross distribution improvement is not due until 2030.

Water quality

As the WCS is currently written, with regards to water quality, the document lacks clarity, is missing important pieces of information and in some places appears confused and difficult to understand. We would not consider it to be evidence-led in its current form and makes conclusions which are not supported by the data and require some work to provide a proper understanding of the impacts and mitigations that will be required. The RQP runs (River Quality Planning model) should have been completed for all freshwater sites, not just those with less than 10% headroom post growth, to fully understand the impacts and account for current permits that may be old and not protective of the environment. For the RQP runs and DWF (Dry Weather Flow) projections, none of the input data used or assumptions made were provided, so we cannot assess the validity of the conclusions drawn. There were many data gaps in the RQP runs for P, NH4 and BOD, which leads us to wonder why

SAGIS-SIMCAT (the model) was not instead used for the modelling component of the study. If the methodology used for RQP runs and DWF projections is available, could it please be provided as an appendix?

EDM (Event Duration Monitoring) data was inconsistently analysed throughout the WCS and requires further work. We also found that waterbody status under the Water Environment Regulations 2017 was not properly considered in the results. As the Axe is the only nutrient neutrality catchment in East Devon, it would be helpful to separate this out into its own section, as the environmental quality targets that we are aiming for in the Axe (CSMG [Common Standards Monitoring Guidance] targets) are more stringent than in the other catchments. Lastly, AMP8 WINEP improvement schemes at South West Water's assets were not considered in the study, and should be factored in.

It is not clear from the WCS to what extent SWW has been consulted or where their evidence has been used to identify the high-risk areas within East Devon. It would be a useful part of the process to understand where SWW's own planning department has identified current or future capacity issues that may limit development and what the measures are to address this.

In addition:

- The WCS fails to reference bathing Waters and Shellfish Waters as protected areas and potential risks from growth, mitigation measures etc.

- The outcome of the modelling for Kilmington STW was green: limit deterioration to 10%. However, this site discharges into a failing HD site and we would not offer a 10% deterioration under this scenario.
- We suggest that the WCS takes into account the potential requirement for new permit limits as a result of growth or any Urban Waste Water Treatment Directive requirements, if population equivalent thresholds are crossed at an STW.
- The WCS should explicitly state the requirement for developers to offset nutrients in the Axe catchment, due to nutrient neutrality status.
- The WCS doesn't reference the environment destination investigations in AMP8 that may affect water availability from AMP9 onwards. It should consider them and the potential to affect the water cycle in East Devon.
- In general, there is no consistent approach to discussing the condition of infrastructure across East Devon and the potential impact of increased growth, risk to the environment, mitigation etc. This is a key factor when planning growth across the district.
- As the Axe catchment is the only nutrient neutrality catchment in East Devon, it may be beneficial to have a separate River Axe/Axe catchment section. We are aiming for CSMG (Common Standards Monitoring Guidance) targets here, not WFD. This should be made clear and appropriately reflected in the modelling outputs.
- There is very little discussion around EDM data or a lack of capacity within networks beyond considering dry weather flow.
- The WCS concludes that the developer needs to provide information on impacts, but this will be too late. The granular detail is required now in order to appropriately guide development.
- Within the WCS, or the plan itself there should be an indication that your authority is taking ownership of aligning the local plan policies to South West Water's plans for upgrades and improvements. Ongoing engagement with SWW is needed to progress development and avoid issues with water supply and quality impacts.

We provide the following comments on specific elements of the Water Cycle Study Section/Para

Comments

1.1 Background

Regarding the first bullet point of this section, wherever possible, surface water should be removed from the foul drainage system.

The third bullet point states that the WCS will ensure "there is good water quality within the local catchment". The review should go further than just assessing if there is good water quality. Indeed, there is not clarity on the definition of 'good' being used here. It should be in the context of WFD. Ultimately developments should not impact current WFD class or prevent getting to Good in the future (this is stated later in the document under section 3).

1.2 Overview of East Devon area

On the map of the area Figure 1.1 it appears that some of the STWs sit on the EDDC area boundary. The WCS should consider growth outside the area which would impact the STWs, or at least

recognise that there may be more flows from growth outside the catchment.

3.1.1

Assessment of developments

The bullet points on page 25 pose several questions. We would expect the WCS to answer these questions, rather than the inference that your authority do so.

Within Table 4.5, Honiton STW is not showing as exceeding its DWF limit, when it has done so since 2019. We would question whether there are there any other sites that are exceeding DWF and also aren't accurately reflected in the table.

5.1.4 Wastewater treatment capacity

The headings on table 5.5 need to be clarified.

5.1.5.1 Water Environment Regulations: water body status

The description of Table 5.7 does not read clearly, this needs to be clarified.

5.1.7 Planned investment at Exmouth Maer Lane

This section does not mention AMP8 WINEP scheme for ND for shellfish. Please see the WINEP dataset:

<https://environment.data.gov.uk/dataset/39b11ea0-3cfa-4cbb-b3a1-b5950019f169>

5.1.8 and 5.1.9

Previous updates to Exmouth Maer Lane and Countess Wear are detailed in these sections. However, it is not clear why these two have been singled out from the other SWTs listed. The rationale for this should be provided.

5.1.10 Exmouth CSO performance between 2018 and 2024

This section should be structured differently. The title suggests Exmouth to be discussed but then text goes into CSO general performance across multiple assets.

The section on Countess Wear does not reference the Shellfish Water and incorrectly appears to suggest that the Environment Agency is the regulator responsible for SPAs and Ramsar sites.

Further, we question why has the WCS used EDM data from "*the Rivers Trust detailed CSO performance*" instead of primary sources from SWW or gov.uk?

5.1.10.1 Critical areas

For Table 5.9, we question why was 2020 not used to compare spills against? And, how was the Future data trend considered? Details on these points should be provided within the WCS.

5.2.1 Sewerage network

The first paragraph of this section states: "Increased discharges from WwTWs may have an adverse impact on flood risk..." It is not only flood risk that should be considered from increases in discharge but

the water quality of the receiving water courses due to pollution incidents. No assessment has been done of sewer capacity and whilst we would not expect one, it should be acknowledged and linked to DWMP outputs.