

## **Thames Water and the River Chess Association meeting**

A meeting was held between the River Chess Association and Thames Water at Clearwater Court, Reading 10 am Monday 24 May 2010.

Those present:

### **Thames Water**

Jonathan Westlake  
Howard Brett  
Huw Thomas

### **River Chess Association**

Paul Jennings  
David Le Neve Foster  
Stephen Webster

The River Chess Association gave a brief presentation outlining their interests and aims, specifically the protection of the River Chess as an example of the rare and threatened chalk stream ecosystem. The RCA mentioned the expectation of affiliation with the Association of Rivers Trusts.

Thames Water described some of the wastewater quality projects they are currently implementing, with an indicative total spend of £750 million for the period 2010 to 2015 (known as AMP5). This programme has been agreed by their regulators and is now set; however the RCA were informed that now would be the right time to gather evidence to demonstrate any issue for inclusion in the next Periodic Review process.

The RCA explained to Thames that they were establishing a water quality monitoring programme that would look specifically at fly life, reflecting an approach adopted on the River Wandle. The RCA plan to use the results from the monitoring programme to assess the effect of the discharge from the Chesham STW.

Thames Water explained that they do not currently see the Chess as a problem river due its favourable biological and chemical quality assessment results, as collected and reported by the Environment Agency (EA). TW also informed the RCA that they are currently operating within their consent set by the Environment Agency to protect the River Chess and are therefore acting responsibly in meeting the obligations expected of them.

The RCA response was that the TW stance did not recognise that the River Chess needs special treatment, and ignored that it is a small chalk stream and as such a rare and delicate ecosystem. TW, however, maintained that such status would be taken into account by the Agency when setting consents.

The discussion then moved onto water resource issues, which the RCA accepted were principally to be raised with Three Valleys/Veolia Water. There was discussion of the merits and drawbacks of metering policies and demand management in general, but TW were not aware that the Chess catchment was over-abstracted, as detailed low-flow investigations are required (as part of the CAMS) to determine this. RCA noted that the Chess catchment is

already designated as an area of over-abstraction according to the EA Colne Catchment Abstraction Management Strategy. The RCA issued a post meeting note (attached as appendix 2) clarifying this point.

Thames Water then explained the respective roles of the Environment Agency and the UK water companies and the process by which water quality enhancement schemes start, become assessed and then come into effect. Thames Water offered advice on how the RCA could support the Environment Agency in undertaking their role of assessing the River Chess, thereby providing evidence to demonstrate that the current river quality assessments do not match the RCA's experience of the river's quality. This could then trigger a change in the consent Thames Water has to comply with and so drive investment for an improvement scheme.

The RCA then presented their understanding of the position on storm water discharges as follows:

The storm discharge consent issued by the Environment Agency does not include the requirement to:

- Measure the quantity or content of the discharge;
- Report the discharges to the Environment Agency;
- Warn or inform other river users who rely on the river for recreation and their livelihoods of these discharges;
- Understand the health and safety issues arising from these discharges;
- Carry out environmental impact studies on the effect of this practice.

Thames confirmed that the RCA's understanding was correct, noting again that impact assessment is the province of the EA prior to issue of consent (or consent revision).

The RCA strongly expressed their opinion that Thames Water's approach (of "dumping untreated sewage in the river") was at odds with "*We are committed to being a good neighbour,*" a quote taken from Thames Water website.

Thames stated that the practice of releasing storm sewage into a river is not necessarily unneighbourly as any discharge is expected to be heavily diluted by rainwater with the initial flush from the sewers caught by storm tanks and by doing so it prevents or significantly reduces the probability of land and properties from flooding with sewage. The RCA, however, were of the view that this activity was basically unacceptable and presented a siltation problem for those downstream, and, furthermore, that this was contrary to Thames's statement as in their view, this meant that the River Chess downstream of the STW at Blackwell Hall Lane was being flooded with sewage. Thames did not accept that 'flooded with sewage' was an accurate description. In addition, the RCA put it to Thames Water that the dynamics of a chalk stream like the Chess were such that flows in the river do not respond significantly to rainfall events that are typically associated with storm discharges, therefore not offering any significant further dilution that can happen with more flashy rivers.

Discussion of the discharge consent was proposed as an agenda item and although briefly mentioned, was not discussed in depth due to lack of time.

Thames stated that discharges from STW Storm Tanks of 10 or more times a year is not

unusual and at many sites may be more frequent, being dependent entirely on rainfall. RCA responded with their concern that a different approach should be adopted for small chalk streams compared to the normal standards for bigger lowland rivers. The RCA also stated that they are concerned by the increase in number of discharges and the significant increase in the duration of each of the incidents that Thames Water's data indicates:

*(extract from presentation)*

<i>Data Period</i>	<i>Months</i>	<i>Total Incidents</i>	<i>Total Discharge Hours</i>	<i>Average Incidents per Month</i>	<i>Average Discharge Hours per Month</i>
1 Jan 2003 to 30 Sept 2009	81	49	148hrs 3 mins	0.60	1hr 49mins
1 Jan 2003 to 30 Nov 2006	47	15	14hrs 54mins	0.32	19mins
1 Dec 2006 to 30 Sept 2009	34	34	133 hrs 9mins	1.00	3hrs 55mins

Based on Data supplied by Thames Water

The RCA noted that since Kemble Water completed their acquisition of Thames Water on 1 December 2006 the data shows a threefold increase in discharge incidents and a greater than 12 fold increase in discharge hours.

Thames Water did not believe that the data could be used to draw the conclusions the RCA had come to, noting that the data that had been supplied was what was available and hence may be incomplete, and that such discharges would also be variable according to weather conditions. Thames noted whilst current data collection is sound, the same may not be the case for older records, so there is difficulty in getting good, reliable data on historic storm discharges. TW agreed to provide data on an annual basis, as available.

**Action:** TW to provide storm tank discharge data on an annual basis

The RCA said in their experience the public were unaware that these discharges take place. Thames expressed their view that this was not necessarily so. The RCA replied that for people working in the industry it might be a well understood part of operating a sewerage system but from their experience it was not widely understood and in most cases there was a high degree of shock and disgust when the practice is raised. The RCA then suggested that Thames and the EA might want to give this practice wider publicity. Thames Water explained that in their experience the public do not give sewage disposal much thought and as such it is a subject of little general concern provided the river water quality was sufficient.

The RCA presented results of initial work to correlate rainfall to the storm discharges data. While the majority of the discharges could be shown to follow rainfall, the analysis showed that there were a small number of discharges which could not be correlated to heavy rain. TW acknowledged that such discharges would be of concern and undertook to look into this.

**Action:** TW to try and investigate past circumstances when storm discharges appear to have been made without obvious heavy rainfall

The RCA requested a site visit to Chesham STW, which Thames agreed to arrange.

***Action:*** TW to arrange site visit

The RCA then stated their desire to have a collaborative approach to addressing storm discharges from Chesham STW and that they would like to work more closely with Thames and offered to share their monitoring data with them. The RCA provided Thames Water with their view of a suitable plan of action. (attached to minutes as appendix 1)

***Action:*** RCA to share monitoring data

Paul Jennings & Howard Brett

16 June 2010.

## Appendix 1 – River Chess Association proposed action plan:

### **Water quality measures need to be taken to reduce environmental risk and enhance the River Chess chalk stream ecosystem**

- Acceptance that the River Chess chalk stream is a rare ecosystem that requires a greater duty of care from Thames Water.
- A detailed assessment of the additional sewage throughput expected at the Blackwell Hall Lane plant resulting from the implementation of Draft Core Strategy for Chiltern, specifically the new housing.
- A coordinated water and fly monitoring plan working with the Environment Agency and voluntary bodies such as Impress the Chess, ourselves and others.
- The number of sewage discharges into the River Chess should be reported and recorded by Chiltern District Council as an indicator for measuring the success of infrastructure provision;
- A detailed plan of how the Blackwell Hall Lane plant can be upgraded and expanded to improve water quality and treatment capacity.

## Appendix 2 – River Chess Association post meeting note on CAMS:

REPORT OF AN APPLICATION TO RENEW ABSTRACTION LICENCE No. 28/39/28/0591 UNDER THE WATER RESOURCES ACT 1991 (AS AMENDED) AND THE ENVIRONMENT ACT 1995”

### “15. RESOURCE ASSESSMENT

#### 15.1 Water Resources Policy –

The proposal falls within the Colne CAMS, Groundwater Management Unit (GWMU) 7, Chess. This unit has a groundwater availability status of ‘overabstracted’. This groundwater unit makes up the overall Water Resource Management Unit 1, Upper and Mid-Colne and this unit sets out how water resources will be managed for existing licences. The CAMS states that existing licences may be renewed on more restrictive terms but that the Agency will endeavour to give 6 years notice of conditions that impact significantly on the use of the licence. These restrictive terms may involve a reduction in licensed quantity to reflect actual use in order to contribute to the target status of becoming ‘less over-abstracted’.”