



SENT BY EMAIL

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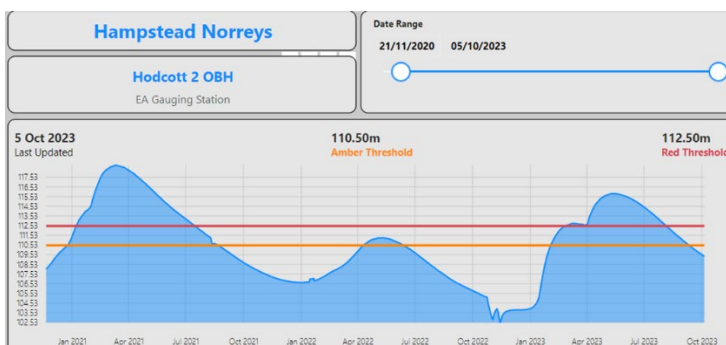
20 October 2023

Dear Laura,

Many thanks for your letter of 18th September about the River Pang. I am sorry it has taken me a while to assemble all the information.

I share your disappointment at the downgrading of the status of the River Pang from Moderate to Poor, and have looked carefully at the reasons for this. Only one component of the assessment has changed from the previous assessment in 2019, with all the other components of ecological status remaining the same. The assessment that has changed is for Fish, which has declined from Moderate to Poor. Because the overall assessment always matches the worst single component, this means that the river will remain at Poor until re-assessed. In conversation with the Environment Agency, they have suggested, as have others who know the river well, that the poor result for Fish in 2022, which came from a single survey at one location, could have been influenced by the exceptionally hot and dry weather in the summer of 2022. The fact that the parameters which are most affected by sewage, namely invertebrates and ammonia, remained High, and the fact that there were no discharges of untreated sewage from Hampstead Norreys STW during 2022, suggests that the downgrade has not been influenced by the performance of Hampstead Norreys sewage works (STW).

Nevertheless, as you know, we regard any discharge of untreated sewage as unacceptable and are working hard to make them unnecessary. This is of course all the more important when the discharges are to a chalk stream. The root cause of the majority of untreated discharges from Hampstead Norreys STW is infiltration into our network, leading to higher flows arriving at the works than it can treat during periods of high infiltration. The graph below shows groundwater levels at the EA's Hodcott gauging station, in blue. The amber line is the level at which we expect occasional untreated discharges due to groundwater to be necessary. The red line is the level at which they are highly likely.



We are tackling these problems in two ways. First, we are tackling the issue at source by reducing infiltration into the network. The first stage of the work, which has now started, includes CCTV surveys of the foul sewers to be sealed as well as surveying unmapped, and previously private, sewers to determine the condition and length of pipes. The second stage of the work will be to seal the surveyed sewers and manholes. This will generally involve lining the sewers and injection sealing the manhole chambers. A number of the manholes will also have new leak tight covers installed where they are considered to be vulnerable to overland flooding. The survey work is expected to take six to eight weeks and it is likely that the sealing work will commence before all surveys are complete. It is hoped that the sealing will be completed by end of May 2024 but timescales may be impacted by weather and high groundwater.

We are also planning a significant upgrade of the sewage works. This work is recognised as a high priority and we have been able to bring dates for the work forward by three months. The current schedule has work due to start in Nov 24 and run to Oct 25 but we will continue to look for ways to accelerate it further. The design for the scheme is still being finalised, but it is likely to include new inlet screens and balance tank, elimination of hydraulic restrictions, increased capacity prior to the hydrobrake, potential replacement of the hydrobrake, a new premature spilling alarm and a full refurbishment of the reed bed treatment system.

You asked for our assessment of all the STWs along the Pang and details of untreated discharges from them. The Area Operations Manager has provided comments as follows:

Bucklebury (via Briff Lane Stream)

This site is performing consistently well for quality compliance and is fully compliant on the regulatory sample look up tables for all aspect. There have been no reported pollutions in the site's recent history.

Chapel Row (via River Bourne)

There have been a small number of pollutions which we have reported to the EA at Chapel Row STW this year. These have included primarily discharges before reaching full flow to treatment (due to inlet pump failure and national grid power failures), and issues with the biological treatment process (especially during the September '23 heatwaves). Work is set to commence shortly on upgrading the flow to treatment pumps to provide robustness going forwards for flow compliance. The site is fully compliant on the regulatory sample look up table for all aspects.

Beenham (Webb Lane Stream)

This site is performing consistently well for quality compliance and is fully compliant on the regulatory sample look up tables for all aspects. There have been no reported pollutions in the site's recent history. Two incidents were self-reported to the EA in April & May 2022, following blockages which caused storming before achieving full flow to treatment.

Compton

This site has one recorded regulatory sample exceedance on the Operator Self -Monitoring programme. In April 2023, the sample returned a slightly high result of 11.9mg/l for Biochemical Oxygen Demand vs a permit limit of 10mg/l. This was linked to elevated suspended solids following a period of asset-related issues. There have been no reported pollutions in the site's recent history.

Hampstead Norreys

This site is performing consistently well for quality compliance and is fully compliant on the regulatory sample look up tables for all aspects. There have been several self-reported pollutions in 2023, all of which relate to discharging from storm before achieving full flow to treatment. The root cause of this pollution has currently been determined as hydraulic restrictions in passing forwards flow after the secondary treatment stage and forwards to the tertiary treatment stage. A solution will be scoped by our contractors. Modifications and maintenance conducted at the nearby Sewage Pumping Station have helped stabilise flows arriving on site – preventing early storming due to “peaky” spikes in flow being delivered, followed by periods of little or no flow. Routine cleaning and jetting activities have been established to help ensure the pipework delivering flow to the tertiary treatment remains consistently clear and the flow meter reading accurately to ensure confidence in our readings and reporting.

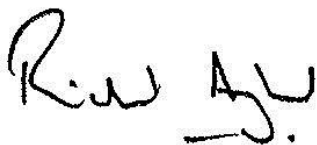
In response to your request for details of incidents, I am attaching data from our Event Duration Monitors at Compton and Hampstead Norreys STWs as recorded during the period 18/09/2020 to 18/09/2023 inclusive (3 years’ data as requested). Please note:

- At Hampstead Norreys and Compton STW, no discharges were recorded from 18/09/2020 to 31/12/2020;
- At Hampstead Norreys and Compton STW, no discharges were recorded in 2022;
- At Compton STW, no discharges have been recorded in 2023 to the date of your request 18/09/2023;
- Please note that EDM data for 2023 has not yet been fully verified or validated.

Information for Bucklebury, Chapel Row and Beenham STWs will follow in a separate letter.

The next meeting of the Pang Flagship Project will be on 31st October at 1 pm on Teams. If you are able to join I will make sure the invitation is forwarded. I will also be in touch with your office to arrange a time for a visit to one of the potential project sites and, if it would be of interest, to see Hampstead Norreys STW and some of the work to reduce infiltration in the catchment.

With best wishes,



Richard Aylard CVO
Sustainability Director

Attachments:
Hampstead Norreys STW
Compton STW