



Attention: Rachael Fletcher Chief Executive Officer  
OFWAT  
4th floor  
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**River Chess Association**

*Established 2009*

**15th October 2019**

Dear Rachael,

## **Thames Water's Business Plan for 2020- 2025**

We have two major concerns when it comes to the environmental impact on the River Chess by the water industry. The Chess Catchment suffers from over abstraction from both Thames Water and Affinity Water, we also suffer from storm related sewage discharges into a small chalk stream, often at times when the river is heavily depleted. So as a Stakeholder our priority is reductions in abstraction and investment into wastewater capacity to ensure that we can move to a situation where storm water sewage discharges become a historic memory and this form of pollution is no longer permitted or ever experienced.

We can see in the Thames Water Business Plan 2020-25 a planned reduction in abstraction at Hawridge. We applaud this and look forward to it being implemented. With regard to storm water sewage discharges we have seen a reduction in these events but have been reminded recently that the problem has not gone away. The Chesham Sewage Treatment Works still cannot cope with sudden heavy deluges of rain and we are sure that if groundwater returned to levels similar to 2001 or 2014 the plant would also fail. In 2014, sewage was discharged continuously for 4 months. So we expect your final determination to facilitate this work being completed.

We have read your "Time to act, together: Ofwat's strategy" published this month and we are encouraged to read "**water companies to leave the environment in a better condition for our grandchildren;**" We are looking forward to seeing how your strategy is to be implemented and the beneficial impact it will have on the environment. We would be pleased to act together with OFWAT to ensure this happens.

With respect to the determination of the Thames Water Business Plan 2020-25 we have the following thoughts.

How do you reconcile the two incompatible requirements of maintaining low water prices while ensuring no damage to the environment?

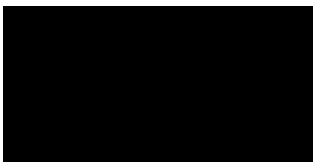
We note the criteria for water company investment gives little headroom for volume tolerance, how does this sit with recent climate events, long dry period and short sharp deluges? So many new highs and lows in rainfall, in the Chilterns we have seen 3 of the lowest rainfall years in the past 5

years, mixed with deluges, 5 this year already in the Thames catchment alone. This indicates that water infrastructure needs to have significantly more resilience built into investment decisions. Is this being addressed in the Business Plan 2020-25 determination?

There is a strong steer for water companies to reduce demand (sales), reduce costs, control prices (flat or declining), reduce leaks and invest in major infrastructure. All the while shareholders expect dividends from their investment and debt needs to be serviced. How will this satisfy all current expectations? Is this a sustainable model?

There is a focus on reducing leaks, stopping water escaping back to the environment. There is now a long-standing history of targets being missed. This begs the question, are the targets achievable? are fines too small? is it cost effective? is it important? We fear that years of focus on reducing leaks is delaying attention on the real issues, spending money accessing alternative non abstractive sources of water and creating a robust resilient wastewater infrastructure.

Yours sincerely



Paul Jennings

River Chess Association

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To find out more about the River Chess Association go to [www.facebook.com/RiverChess](https://www.facebook.com/RiverChess) or [www.riverchessassociation.org](http://www.riverchessassociation.org)

The River Chess is a chalk stream that rises in Chesham, Buckinghamshire, and runs through the Chess Valley to Rickmansworth where it becomes a tributary of the Colne. The Chess Valley is part of the Chilterns Area of Outstanding Natural Beauty and the river is home to a variety of important species, such as water vole, kingfisher, brown trout, grayling and stream water crowfoot. Interesting visitors, such as Osprey, also come to the river.

The Chess faces many threats, including low flows caused by abstraction for public water supply, invasive species such as mink and Japanese knotweed, and sewage discharges.

The Association carries out environmental monitoring, raises awareness of the issues facing the Chess, educates people about the importance of chalk streams, lobbies the appropriate authorities and provides a forum for the exchange of expertise and ideas.