The Parish Clerk

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The Rt Hon George Eustice MP
Secretary of State for Environment, Food and Rural Affairs
House of Commons
London
SW1A 0AA

Dear Secretary of State,

We, Stanton Harcourt Parish Council, are writing to you on behalf of our residents due to the strong concern raised by what appears to be the now routine discharge of untreated sewage by Thames Water into our local waterways, both causing severe impact on the purity of local rivers and potential harm to drinking water supplied in part by these rivers downstream of discharge.

Recent data from our local Waste Water Treatment plant (STANTON HARCOURT WWTW, DUCK END LANE, OX29 5RH) shows:

- Stanton Harcourt sewage treatment works was number 11 of top spillers in 2018 and number 12 in 2019 of the 250 treatment works belonging to Thames Water).
- Even though they "improved" by 1 place, the numbers of hours of spillage went up from 480 to 1770. An average of almost 5 hrs of spilling every day in 2019.

This suggests that it was discharging raw sewage into the waterway (Harcourt Brook, discharging into the Thames near the reservoir pumping station) around 20% of the year despite being a relatively recently refurbished plant. The local area was already a Nitrate Vulnerable Zone; this suggests such events will lead to the local drinking water exceeding safe levels for nitrates and/or phosphates in short order.

Given that the EU Urban Waste Water Treatment Directive (implemented in the UK under The Urban Waste Water Treatment (England and Wales) Regulations 1994) requires that storm water overflows are only allowed in 'unusually heavy rainfall', it seems unlikely that 'unusually heavy rainfall' occurred over 20% of the year, and given the legal requirements for a village of our population were required to be in place in 2005, it seems inappropriate still to have routine untreated discharges 15 years after implementation; this strongly suggests that much of the discharges are not being done legally.

The documented change in local climate shows a notable increase in rainfall over the last few years; so it is no longer 'unexpected' to have frequent and relatively heavy rainfall. Clearly this has significantly reduced the relevance such an event being classified as unusual.

Furthermore, recent planning applications have been universally endorsed by the utility (in our case, Thames Water), leading to a belief that there is adequate capacity to cope with domestic new builds (completed and potential), which will result in a 25% increase; the waste water, which will require treatment, will increase by a similar amount. Action is needed to service this severe increase in the discharge of untreated sewage, not because of 'unusually heavy rainfall' but a planned increase in waste water agreed in advance through the acceptance of planning by Thames Water.

It appears to us and our constituents that it is untenable, in the circumstances of the current overflows, to argue adequate capacity exists for such an increase in development; similarly in general the discharges are incorrectly attributed to 'unusually heavy rainfall'; the only conclusion inevitably must be that the relevant sewage regulations are not being enforced or honoured today, let alone in the future. This therefore seems to lead to the role of the Environment Agency.

No mention has been made of the extreme effect on the life of our waterways – in our area, the River Windrush in particular. No mention has been made either of the sewer flooding that regularly occurs each winter in many of our local villages

We look forward to hearing what action is to be taken both to reduce these current untreated discharges to events, to ensure future needs are adequately accommodated and what action is being taken by regulators to penalise the firms involved, given the discharges and annual sewer flooding has clearly become routine and not exceptional.

In order to provide firm discouragement of such events in the future (if not, to force literal and correct interpretation of the law), action is urgently needed.

Kind Regards

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Trudi Gasser Parish Clerk

On behalf of Stanton Harcourt Parish Council

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MPs: Robert Courts MP, Annabel Pickup, Luke Pollard MP, Philip Dunne MP,

Oxfordshire County Council: Ian Hudspeth, Judith Heathcoat

West Oxon District Council: Steve Good, Hilary Fenton, Environmental Services

Environment Agency, Thames Water, Consumer Council for Water, OCC Environment, OFWAT, Oxford Mail Editor: Samantha Harman, WASP