



SOLENT PROTECTION SOCIETY

Protecting the Solent and its environment for future generations

17 January 2025

Reforming The Water Sector

By email to efracom@parliament.uk

To Members of the Committee investigating Reforming the Water Sector.

Solent Protection Society

The Society is an environmental charity, founded in 1956. The Society seeks to ensure the ecological and environmental well-being and wise management of the wider Solent area, its natural beauty and amenities, so that these may continue to be enjoyed by present and future generations. Our four primary areas of focus are Pollution, Climate Change adaptation, Planning and Marine Science, all of which are affected by the supply of safe drinking water and the safe management of wastewater.

In response to the call for evidence by the Committee, Solent Protection Society offers evidence documented on a single web page at the following address:

[Solentprotection.org/efracom](https://solentprotection.org/efracom)

The Society's three areas of concern are:

1. CSO Discharges

For the last 5 years we have been monitoring and analysing CSO overflows into the Solent using EA data and have had extensive discussions with Southern Water. Our findings from Environment Agency data and other sources have shown that of around 300 publicly identifiable outfalls in the Solent, a relatively small proportion of these, around 40, are responsible for the bulk of the unacceptable discharges. These discharges, from Southern Water infrastructure, are extensive, regular and occur even with little rain, adding up to many thousands of hours per year.

The link provided at the head of this letter details our report for the period up to the end of 2023, from which you will see that of around 300 identified combined sewer overflows into the protected waters of the Solent, around 40 are evidently clear worst

secretary@solentprotection.org

www.solentprotection.org

The Chairman, Solent Protection Society, 3 Cedar Close, The Dean, Alresford, SO24 9BH
Solent Protection Society – Registered Charity No. 1154317

cases at which early improvement needs to be concentrated.

It is clear to us, after the years of monitoring this data, that the principal cause of overflows is rainwater entering the system by various means, which in our area is significantly made up of combined sewers.

If the committee is minded to ask some specific questions about failures to meet licence permits, then it may consider the following:

*“In 2020 Southern Water produced a **Pollution Incident Reduction Plan** in which you stated that you wished to get the number of ‘pollution incidents’ in 2019 of nearly 250 down to around 100 in 2023 and 80 in 2024 with an ambition to reach zero in subsequent years.*

Can you tell the Committee how many pollution incidents there were in 2023?”

(The answer for 2023 is, we believe, 234).

As a supplementary question:

“Can you tell the Committee how many of these were Category I (the most serious) in 2023 and how this compared with other water companies?”

(the answer for 2023 is 4 and we understand that SW were the worst performing water company in 2023, based on EA data)

2. **Stormwater Management**

The Society has serious concerns about Southern Water’s ability to safely manage both its water supply infrastructure and its wastewater network infrastructure. The company’s record of technical failures of public water supply and the disruption caused by frequent sewer bursts has been well documented.

Possible questions:

“Can you provide total costs for emergency maintenance work made necessary due to unscheduled failures of your infrastructure during the years 2023 and 2024?”

“How much has the Company set aside in its budget to cover unscheduled infrastructure failures for the years 2025 to 2030?”

3. **Water Resources Management**

Solent Protection Society has significant concerns with Southern Water’s approach to the provision of future water supply. We have documented these concerns in public

consultation responses to the company's Hampshire Water Transfer and Water Recycling Project and to recent iterations of its Water Resources Management Plan, our responses to which are attached.

Possible Questions:

"Can you explain the discrepancy between the coding of your NSIP application as a Dam or Reservoir, when its component parts are 'Water Transfer' and 'Wastewater Treatment Works'?"

"How do you justify the financial and energy consumption costs of your strategic advanced water recycling approach to water supply, given the rising costs of failure of the water and wastewater transport infrastructure?"

Please refer to the following online resource for detail on our concerns regarding CSO discharges and Stormwater Management.

Solentprotection.org/efracom

Yours faithfully

A handwritten signature in blue ink, appearing to read 'Robert Comlay', with a stylized flourish at the end.

Robert Comlay

Vice Chair – Solent Protection Society