



SOLENT PROTECTION SOCIETY

Protecting the Solent and its environment for future generations

9 January 2025

Response to the Water (Special measures) Bill

By email to scrutiny@parliament.uk

Dear Sir / Madam

In response to the call for evidence by the Public Bill Committee of the House of Commons, Solent Protection Society, 'The Society', offers the following input in the form of a simple proposal, justified by our extensive research into the impact of sewage discharges into the estuaries, harbours and open water of the Solent region in Hampshire.

1. 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.

2. Research

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.

3. The Society's proposal, offered for consideration:

There are regular occurrences of discharges for which discharge licence conditions have been broken and, in these circumstances, The Society believes that **there should be an automatic fine** levied, regardless of the reason. The Bill should set an automatic penalty charge, say £10,000 for a Category 1 incident, with 10% payable personally by the company Chief Executive and a further 10% payable by the Chair of the Board of Directors. We believe that the cost of such penalty fines should not be passed on to customers.

This penalty should be applied with immediate effect and **should not be subject to appeal**. Additional amounts could be imposed following further investigation by the EA, subject as normal to an appeal process.

4. **Justification**

Solent Protection Society believes that the imposition of an automatic penalty for breaches of discharge licences would focus minds within the Water Companies on rectifying long-standing issues with existing infrastructure which for many years has been starved of maintenance investment.

The Society supports many of the points made in greater detail by Michael John Owens in his response on behalf of Hayling Sewage Watch, dated 30 December 2024, copy attached.

5. **Other research findings**

We would note that our research shows that in the Southern Water area the biggest driver of unacceptable sewage discharges is the influx of rainwater entering the mainly Victorian combined sewerage network. Until this rainwater is effectively slowed down or removed from the network it will be impossible to reach the targets set by the government, laudable as they are.

6. **In summary**

The Society strongly supports the measures in this Bill and would be happy to provide further information should the committee request it.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Chris Edmond', with a horizontal line extending from the end of the signature.

Chris Edmond

Chair – Solent Protection Society