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Environment Agency,  
Water Resources Team, Sheffield, S9 4WF.  
2022

27 July

Dear Sirs,  
OBJECTION to 'Southern Water' Application for Drought Permit dated July 2022

I Object to the content of the above Application on the following grounds -

1. I consider the problem, ostensibly to be addressed by the Order, has been caused by years of irresponsibility by Southern Water by its 1.1 continuous polluting discharges of foul water into its own supply chain; 1.2 its own statement in the Application Summary that "flows in the River Test, a vital source of fresh water, are falling", with no proper or acceptable scientific attempt to qualify that ALARMING statement by Southern Water; 1.3 we just have its convenient and unacceptable admission that "we are experiencing a period of "dry weather"; 1.4 its only reaction to that is to apply to further damage the ecology of the SSSI Graded, River Test; 1.5 its failure to provide evidence of any plans, intention or ability, even to properly consider, to expand its sourcing of fresh water from more diverse locations thereby, irresponsibly, relying more & more on the very delicate River Test source; 1.6 its clear failure to plan for Climate Change which will arguably continue to affect fresh water supplies; and 1.7 in my view, its modus operandi as a private profit driven company which renders it unable to reconcile its actual responsibilities to not just the environment but also to protect the lives of all living beings, both human & non-human, by acceptable provision of an adequate supply of life giving fresh water second only to 'fresh air' in preserving life.

2. I consider it entirely for this Company to predict that years of rising temperatures in climate change together with 'known' rising population numbers would require the Company to ensure additional sources of fresh water were made available, responsibly, IN ADVANCE of the inevitability of this statistical problem. Now we are, in panic, being asked to agree a very ecologically dangerous extraction increase which, of course SWater knows, if refused will cause potentially untold difficulty to its millions of customers paying their water supply bills regularly in good faith. And, I consider it is not the first time Southern Water has been, by its secret private commercial ethos, found to have taken risks of serious enormity to its customers and environment as to put its position & existence in serious doubt.

3. I also comment on some parts of the Application Documents - 3.1. the wording appears not to mention the IOW in many places, so can I assume this seeks to drive a wedge between them and us on the Island?; 3.2. it Records with little apparent concern that 3 out of 5 headwaters of the River Blackwater contain Grade 1 Pollution problems; 3.3. having researched over several years, presumably with input from SWater, the Water Resources Management Plan, published in 2024, indicates clearly that both SW and the EA already knew that "supplies of water (presumably fresh?)" in S.E. England were already stressed in 2022" which begs the questions - 3.3.1. why did the Environment Agency apparently react inadequately to that serious information? & 3.3.2. why was SWater not already seeking alternative water supply sources & publishing mitigation measures to remedy that position prior 2022?

4. As an IOW resident and "valued" (their words) customer of Southern Water, I am now forced to face, through no specific fault of myself & my wife, the consequences of the failures of the above Authorities to reasonably mitigate the serious effects of climate change which, as the content of your documentation indicates, were known in advance and were, in my opinion, ignored.

5. I therefore propose that subject to agreement of sensible Conditions, my Objection MAY be overuled, but only after proper consideration of the proposed Conditions below. These Conditions are as follows -

5.1 that a reasonable timetable is to be published for all fresh-water rivers in this region to be designated as Reservoirs;

5.2 that all safeguards applicable to that Designation will be applied to them;

5.3 that new down-stream extraction measures are to be planned & dated to come into effect starting before the end of 2022;

5.4 that any discharge of fresh water into the salt-polluted sea is legally controlled;

5.5 that all such control barriers are provided with suitable fish passes and sluices to control outward water flow;

5.6 that, in view of the obvious urgency of this fresh water crisis, a firm timetable for full consideration of 5.1, 5.2, 5.4 & 5.5 above is published within the next 3 months about which I wish to be kept informed.

Yours Christopher Dodd BA