Portsmouth Water

# PORTSMOUTH WATER LIMITED

## Pollution Incident Reduction Plan

# CEO STATEMENT

As Chief Executive of Portsmouth Water, I am pleased to approve our first Pollution Incident Reduction Plan. As a **water only company**, we have a clear responsibility to protect the environment through the safe abstraction, treatment and distribution of drinking water.

We operate in an area of exceptional environmental sensitivity, and our teams take great pride in maintaining **six consecutive years with zero serious pollution incidents**. In 2025, we recorded only two minor incidents, both quickly contained with no lasting impact. This plan sets out how we will maintain that strong performance by continuing effective measures and introducing targeted improvements where needed.

Through AMP8, we are investing significantly in our network, our people and our monitoring capability to ensure we remain proactive and resilient. I am confident that the actions in this plan will help us continue to protect the environment and uphold the high standards our customers expect.

**Bob Taylor**
Chief Executive Officer

**Bob Taylor**
Chief Executive Officer
March 2026

# CONTENTS



## Tables in Content

# EXECUTIVE SUMMARY

Portsmouth Water supplies high-quality drinking water to more than 725,000 customers across Hampshire and West Sussex. As a **water-only company**, we are responsible for the environmental performance of our clean-water activities from abstraction and treatment to distribution and we operate within one of the most environmentally sensitive regions in the UK, including internationally important chalk streams and multiple designated habitats.

We have maintained an exceptional environmental record, achieving **zero serious pollution incidents (Categories 1–2) for six consecutive years (2019–2025).** This performance reflects strong operational discipline, proactive asset management and a well-established prevention-first culture. In 2025, we recorded only **two minor Category 3 incidents**, both located on the Water Distribution Network, and both quickly contained with no lasting environmental impact.

This Pollution Incident Reduction Plan (PIRP) fulfils our statutory duties under the **Water (Special Measures) Act 2025**. As our first PIRP, it provides:

- A clear review of pollution incident frequency, seriousness, and root causes in 2025
- The steps taken during 2025 to maintain our system and reduce pollution risk
- The additional measures implemented or continued in 2026
- Our approach to maintaining our exceptionally low number of incidents

The two incidents recorded in 2025 were isolated and directly linked to **age-related pipe deterioration** and **localised corrosion**. Our planned measures for 2026 directly address these causes, as well as the wider set of six recognised root cause categories, ensuring that our network remains resilient and environmentally responsible.

Our performance targets for AMP8 remain clear and ambitious:

- **Zero serious pollution incidents (Categories 1–2)** throughout AMP8
- **100% compliance** with discharge permits across all six consented sites

With only two minor incidents in 2025, our focus for 2026 has been to **sustain and strengthen the effective practices already in place**, while introducing targeted enhancements that support continuous improvement. This plan demonstrates our ongoing commitment to environmental protection, operational excellence and maintaining the trust of our customers, stakeholders and the communities we serve.

# PORTSMOUTH WATER AT A GLANCE

## Our region

A local company with a proud history of serving our customers for over 160 years

# PORTSMOUTH WATER AT A GLANCE

## Key facts

We supply a population of nearly
**743,000 PEOPLE**

**42**
water sources and service reservoir sites

Over
**100,000**
tests on water carried out in the lab each year

We employ
**363 PEOPLE**

**186 MILLION**
litres of water distributed each day

Our pipe network length is
**3,409 KILOMETRES**

# WHAT ARE POLLUTION INCIDENTS?

Pollution incidents occur when substances enter the environment in an uncontrolled way, potentially affecting rivers, streams, groundwater or surrounding land. For Portsmouth Water, a clean water-only company, these substances are most often clean, treated drinking water. Although our operations do not involve wastewater treatment or sewerage systems, our activities still interact closely with the natural environment. When something goes wrong, such as a burst main or an equipment failure, even clean water can cause erosion, turbidity or disturbance to sensitive habitats.

Most of our environmental interactions arise through the essential processes we carry out every day: **abstracting, treating and distributing drinking water**. This Pollution Incident Reduction Plan focuses on preventing pollution from our two key clean water asset types:

- **Water Treatment Works (WTW)** – where raw water is abstracted, treated, disinfected and stored before entering supply
- **Water Distribution Network (WDN)** – the extensive system of pipes, valves, pumping stations and service reservoirs that delivers drinking water to customers

Understanding where pollution can occur within these systems helps us to identify risks early and prioritise the most effective protections.

## Categories of pollution incidents (CICS)

To ensure consistency across the industry, the Environment Agency classifies pollution incidents using the **Common Incident Classification System (CICS)**. These categories reflect the level of actual environmental impact:

- **Category 1 – Major incident:**
  A serious event causing significant, widespread or long lasting environmental harm.
- **Category 2 – Significant incident:**
  An incident with a clear environmental impact that requires regulatory intervention.
- **Category 3 – Minor incident:**
  A low level or short term impact, typically localised and quickly contained.
- **Category 4 – No impact:**
  An event that, following investigation, is confirmed to have caused no environmental harm.

Portsmouth Water has maintained **zero Category 1 and Category 2 incidents for six consecutive years**, reflecting strong operational discipline, proactive prevention and an effective incident response approach.

## How incidents are reported

Incidents may come to the attention of the Environment Agency in two ways:

- **Self-reports** – made directly by Portsmouth Water staff
- **Third-party reports** – raised by members of the public, EA staff, emergency services or partner organisations

We follow a clear internal procedure that ensures the officer leading the incident response is responsible for undertaking the self reporting process. All reports comply with the Environment Agency's **Water Industry Regulation Incidents (WIRI)** guidance and are submitted via the **Incident Communications Service (ICS)**, which records events on the **National Incident Reporting System (NIRS).**

Transparency is central to our approach, and we are committed to reporting promptly and accurately, especially when environmental impact is minor or uncertain.

## Our pollution response procedure

When an incident occurs, we act quickly and methodically to protect the environment and prevent escalation. Our incident response procedure includes:

1. **Immediate containment and protection** – isolating the asset, stopping any discharge and protecting nearby sensitive areas.
2. **Rapid on-site assessment** – determining the source, cause and potential environmental pathways.
3. **Regulatory notification** – informing the Environment Agency when reporting thresholds are met.
4. **Mitigation and remediation** – taking practical steps to reduce and repair any environmental impact.
5. **Root cause analysis** – establishing what happened, why it occurred and whether controls were effective.
6. **Learning and prevention** – updating procedures, maintenance and training to ensure the issue does not recur.

This structured approach helps ensure incidents are managed consistently and efficiently, with environmental protection at the forefront.

## Our targets

Portsmouth Water is committed to:

- **Zero Category 1 and Category 2 pollution incidents,** every year
- **Minimising Category 3 and Category 4 incidents** through proactive management
- Maintaining strong operational controls and rapid response capabilities
- Continual improvement across all environmental protection measures

These commitments underpin our long standing reputation as one of the best performing water companies for pollution prevention.

Section 1

# POLLUTION INCIDENT FREQUENCY, SERIOUSNESS AND CAUSES

This section provides an overview of Portsmouth Water's pollution incident performance during 2025, including the frequency, seriousness and causes of incidents attributable to our clean water system. All data reflects the official Environment Agency pollution incident dataset downloaded on **16 February 2026**. As a water only company, Portsmouth Water operates two clean water asset types: **Water Treatment Works (WTW) and the Water Distribution Network (WDN)**.

In 2025, Portsmouth Water recorded **zero serious pollution incidents (Categories 1–2)** and **two Category 3 incidents**, both originating on the Water Distribution Network. No pollution incidents of any category occurred at Water Treatment Works.

## 1.1 Pollution Incident Performance 2025

Portsmouth Water recorded **zero Category 1 or Category 2 pollution incidents** in 2025, continuing a six year record of exceptional environmental performance. This achievement meets our Performance Commitment Level (PCL) and reflects the strength of our operational controls, rapid response capability and established prevention first culture.

Two **Category 3** incidents occurred during the year, both within the Water Distribution Network. Neither event resulted in any lasting environmental impact, and both were contained quickly through established response procedures.

Our **Compliance Risk Index (CRI)** remained below **2.0** throughout 2025, demonstrating consistently strong drinking water quality compliance and effective management of treatment and distribution risks.

## 1.2 Frequency and Seriousness by Asset Type

**Water Treatment Works**
No pollution incidents (Categories 1–3) were recorded at any Water Treatment Works during 2025.

**Water Distribution Network**
Two Category 3 pollution incidents were recorded on the Water Distribution Network in 2025. These occurred in July and August, with no incidents recorded in any other month.

### Table 1a: Frequency and Seriousness of Pollution Incidents – Water Distribution Network (2025)

| MONTH | CATEGORY 1 | CATEGORY 2 | CATEGORY 3 |
|---|---|---|---|
| January | 0 | 0 | 0 |
| February | 0 | 0 | 0 |
| March | 0 | 0 | 0 |
| April | 0 | 0 | 0 |
| May | 0 | 0 | 0 |
| June | 0 | 0 | 0 |
| **July** | 0 | 0 | **1** |
| **August** | 0 | 0 | **1** |
| September | 0 | 0 | 0 |
| October | 0 | 0 | 0 |
| November | 0 | 0 | 0 |
| December | 0 | 0 | 0 |
| **Total** | **0** | **0** | **2** |

This data shows that Portsmouth Water experienced **no serious pollution incidents and only two minor, quickly contained events** across the entire year, reflecting continued strong operational performance and effective incident-response procedures.

*Note: Portsmouth Water operates only Water Treatment Works and Water Distribution Network assets. We do not operate wastewater systems, sewers or combined sewer overflows.*

## 1.3 Causes of pollution incidents

### 1.3.1 Serious Pollution Incidents (Categories 1-2)

Portsmouth Water recorded **zero Category 1** or **Category 2 pollution incidents** in 2025. No serious incident cause table is therefore required.

### 1.3.2 Category 3 Pollution Incidents

Both Category 3 pollution incidents recorded in 2025 originated on the **Water Distribution Network**. Each was a straightforward burst main failure resulting from **age related asset deterioration,** influenced by environmental conditions such as **ground movement** and **localised corrosion**. No control system or operational control measure failures were identified, and neither incident indicated any wider systemic pattern within the network.

These causes are summarised in **Table 1b**, with detailed information on each incident provided in **Table 1c**.

### Table 1b: Root Causes of Category 3 Pollution Incidents – Water Distribution Network (2025)

| ROOT CAUSE | NUMBER OF CATEGORY 3 INCIDENTS | PROPORTION (%) |
|---|---|---|
| Asset Deterioration | 2 | 100% |

### Table 1c: Category 3 Incident Details – Water Distribution Network (2025)

| EVENT NUMBER | DATE | LOCATION | IMMEDIATE CAUSE | SERIOUSNESS | ROOT CAUSE |
|---|---|---|---|---|---|
| 2411106 | 20/07/2025 05:00 | Burst 15” cast iron main, Wickham (Winchester District) | Pipe burst caused by ground movement acting on an ageing cast-iron main | Category 3 | Asset Deterioration |
| 2417273 | 11/08/2025 11:00 | Burst fresh water main near Enborne Business Park, Bakers Farm (Chichester District) | Pipe burst due to corrosion related weakening | Category 3 | Asset Deterioration |

## 1.4 Performance Assessment

Portsmouth Water achieved its **Performance Commitment Level (PCL)** of zero Category 1–2 pollution incidents in 2025, maintaining a six year record of no serious environmental events. This performance demonstrates the strength of our operational controls, the maturity of our incident response processes and the effectiveness of our prevention first approach.

A total of **two Category 3 incidents** were recorded during the year, both within the Water Distribution Network. These incidents were **minor in impact,** were contained rapidly and resulted in **no lasting environmental harm.**

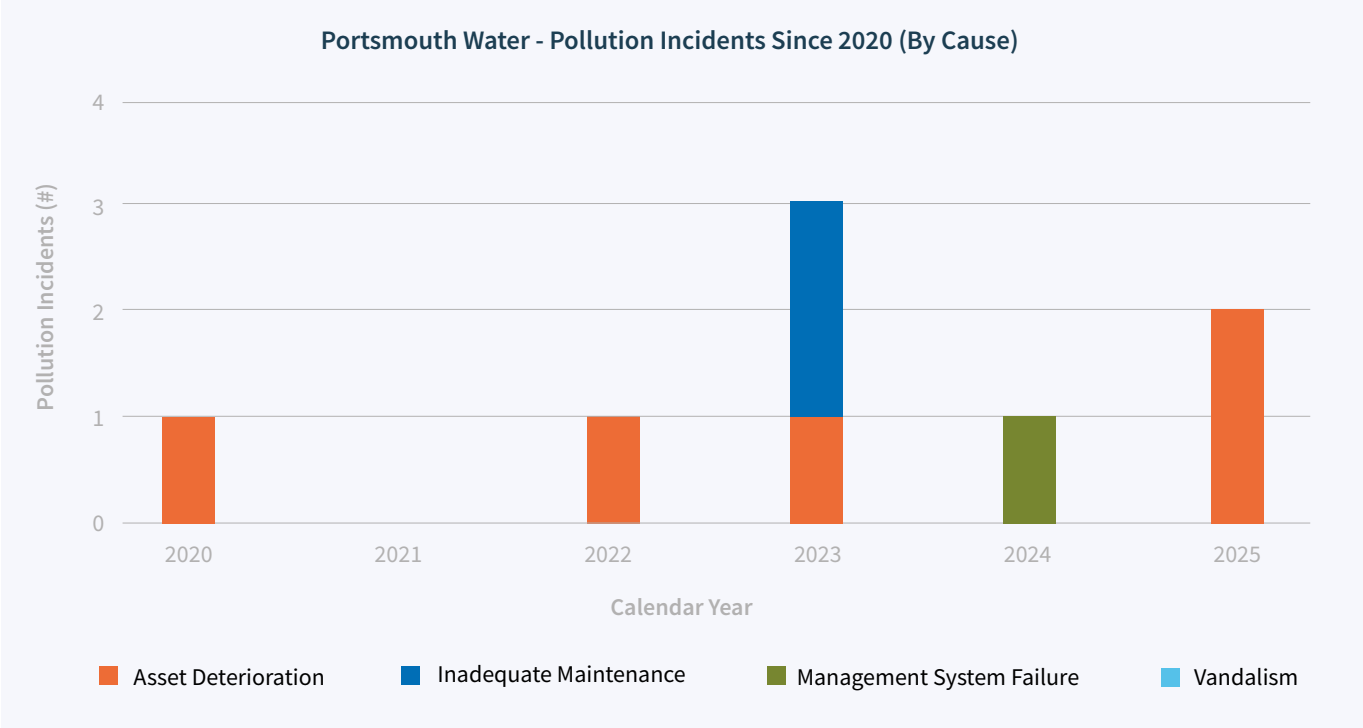

**Figure 1** illustrates the distribution of pollution incident root causes since 2020, showing consistently low incident numbers and no emerging systemic pattern in the nature or frequency of events.

Overall, the 2025 performance profile demonstrates:

- Zero serious pollution incidents, continuing a six year trend
- Very low total incident numbers, with only two minor events
- No evidence of seasonal clustering or systemic deterioration
- Effective containment and response processes that minimised environmental impact

This performance provides a strong foundation for the measures outlined in **Sections 2 and 3**, which focus on maintaining system resilience, addressing the root causes of the 2025 incidents and strengthening pollution-prevention controls across our network and treatment assets.

## Figure 1: Root Cause of Portsmouth Water Pollution Incidents Since 2020



## 1.5 Root Cause Analysis

### 1.5.1 Overview of Root Cause Analysis

A concise review of both Category 3 incidents was completed using operational logs, site inspections and asset history. The findings show that both events were isolated, asset specific failures linked to **ageing infrastructure**, rather than systemic or operational issues.

The immediate cause in both cases was **ground movement during the dry summer of 2025**. High soil-moisture deficit (SMD) during prolonged hot, dry weather can cause shrinkage and subsidence in clay-rich soils, placing additional stress on buried water mains. This environmental condition is a well-recognised driver of burst frequency and can trigger structural failures, particularly on pipes already weakened by **age-related deterioration or corrosion**. In both incidents, ground movement acted on vulnerable assets, resulting in the failures recorded.

### 1.5.2 Event 2411106 – Burst on 15" Cast Iron Main, Wickham

Site evidence confirmed that the failure was caused by **age-related deterioration** of the cast-iron pipe wall, exacerbated by **ground movement during high soil-moisture deficit conditions**. No pressure anomalies, operational issues, control-system failures or third party interference were identified.

### 1.5.3 Event 2417273 – Corrosion Related Failure, Bakers Farm Related Failure, Bakers Farm

Inspection confirmed **external corrosion** on a ductile-iron main previously wrapped in plastic sheathing. Moisture trapped beneath the wrap had accelerated corrosion, leading to **localised structural weakening** and subsequent pipe failure. As with the first incident, no control-system or operational control-measure failures were identified.

### 1.5.4 Summary of Findings

- Both incidents were isolated failures consistent with natural asset ageing.
- No operational, process or control system failures were identified.
- Rapid response prevented escalation and minimised environmental impact.
- Findings support continued focus on **mains renewal, pressure management, and corrosion-risk mitigation.**

These findings confirm that ageing infrastructure remains the primary driver of pollution-incident risk on the Water Distribution Network. They also reinforce the importance of the measures set out in **Sections 2 and 3**, which focus on targeted renewal, system monitoring, and proactive maintenance to reduce future pollution events.

Section 2

# STEPS TO MAINTAIN THE SYSTEM

This section summarises the steps Portsmouth Water took during **2025** to maintain both the Water Distribution Network (WDN) and Water Treatment Works (WTW), and to reduce the risk of pollution incidents. These activities ensure that our clean-water assets continue to operate safely and reliably and that the system remains resilient to the types of asset-related failures identified in Section 1—particularly **age related pipe deterioration** and **localised corrosion**.

While our incident numbers remain very low, maintaining strong environmental performance requires continued focus on asset condition, routine inspections and targeted interventions where risks are identified. The measures delivered in 2025 highlight how we proactively strengthen pollution prevention controls across our network and treatment sites.

Due to Portsmouth Water's very low number of pollution incidents, it is difficult to quantify the precise impact of individual measures on incident reduction. We have therefore scored our impact in **all tables as zero**, aligned to a recommendation from the Environment Agency. Our measures instead focus on risk reduction, resilience, and continuous improvement across our entire asset base.

## 2.1 Water Treatment Works (WTW)

Portsmouth Water's Water Treatment Works are managed through established programmes of inspection, maintenance and operational checks designed to reduce pollution risk and support reliable drinking-water production. In **2025**, we continued to strengthen these processes, with a particular focus on **fuel storage, chemical management, and drainage arrangements** areas that, if not properly controlled, can contribute to pollution risk at clean-water sites.

During the year, **Oracle Environmental Experts (OEE)** completed **16 specialist audits** across all WTW sites. These audits assessed tank condition, secondary containment, drainage pathways and site-specific environmental sensitivities. The findings were reviewed jointly by our Drinking Water Safety and Production teams, and updated guidance and procedures were prepared for implementation from **1 April 2026** to enhance the consistency and robustness of pollution-prevention controls.

Routine operational checks - such as run-to-waste permit compliance, site inspections and chemical storage reviews, continued throughout the year, ensuring that treatment processes operated safely and that discharges remained within permitted limits. Staff training also forms a key part of our approach, and updated pollution-prevention and incident response guidance has been incorporated into training materials from early 2026.

Overall, the measures delivered at Water Treatment Works in 2025 strengthened our ability to prevent pollution, supported compliance with environmental permits and helped maintain Portsmouth Water's strong record of **zero pollution incidents at WTW**.

During 2025, Portsmouth Water also updated hydrocarbon risk assessments across abstraction sites, increasing risk ratings where appropriate and identifying the need for additional pollution-prevention controls. These assessments were submitted as Regulation 28 Reports to the Drinking Water Inspectorate (DWI) and reviewed at CEO level, ensuring strong governance and oversight.

## Table 2a: Water Treatment Works – Maintenance Measures 2025

| MEASURE | DESCRIPTION OF ACTIONS | SCALE OF ACTIONS | IMPACT (INCIDENTS PREVENTED) | ROOT CAUSES ADDRESSED | DELIVERY STATUS |
|---|---|---|---|---|---|
| Site chemical barrier implementation | 16 fuel-storage and pollution-prevention audits completed in collaboration with OEE. Assessed bunding, containment, drainage pathways and tank condition. | All WTW Sites | 0 | Not applicable (no 2025 WTW incidents) | Completed |
| Upper Tier audit programme / Operational assurance audits | Internal DWSP audits at WTW to assess control measures, environmental risk and operational compliance. | All WTW Sites | 0 | Not applicable | Completed |
| Management of clean-water discharges / Hydrocarbon control upgrades | Updated hydrocarbon risk assessments at abstraction sites, increasing hydrocarbon-related risks and identifying the need for additional controls. | All abstraction sites | 0 | Not applicable | Completed |

### 2.2 Water Distribution Network (WDN)

The Water Distribution Network is supported by a comprehensive programme of maintenance, monitoring and operational activity designed to reduce the risk of bursts, uncontrolled discharges and other pollution-related events. During **2025**, we delivered a wide range of measures across the network, with a particular focus on reducing risks associated with **age-related pipe deterioration** and **localised corrosion** - the confirmed root causes of the two Category 3 incidents recorded during the year.

Our preventative approach combines routine inspections, condition assessment, pressure management and targeted asset renewal. Activities such as mains-condition surveys, leak-detection sweeps and pressure-management interventions continued throughout the year, helping to stabilise network performance and support early identification of issues. These measures sit alongside responsive actions taken during burst events, providing a comprehensive approach to reducing the potential for uncontrolled discharges into sensitive locations. Together, the measures delivered across the Water Distribution Network in 2025 strengthened system resilience, reduced the likelihood of pollution incidents and created a firm foundation for the targeted improvements introduced in 2026.

### Table 2b: Water Distribution Network – Maintenance Measures 2025

| MEASURE | DESCRIPTION OF ACTIONS | SCALE OF ACTIONS | IMPACT (INCIDENTS PREVENTED) | ROOT CAUSES ADDRESSED | DELIVERY STATUS |
|---|---|---|---|---|---|
| Proactive cleaning & maintenance | Leak detection sweeps, targeted repairs | Active Leakage Control across the entire network to meet regulatory targets. Targeted repairs based on impact to customers and environment | 0 | General performance – does not address 2025 root cause | Ongoing |
| Mains renewal & rehabilitation | Renewal of mains with high risk of failure | 12km of mains renewed in the financial year 2025-26. Targeted to reduce bursts across the network based on risk of failure and subsequent impact to customers and environment | 0 | Asset Deterioration | Ongoing |
| Pressure calming | PRV optimisation and pressure management | 3 major PRV replacements completed: optimisation across 45 pressure zones | 0 | Asset Deterioration | Ongoing |

Section 3

# PLANNED ADDITIONAL MEASURES FOR 2026

This section sets out the additional measures Portsmouth Water delivered during **2026** to further reduce the likelihood of pollution incidents and strengthen the resilience of our clean water assets. These actions build on the findings from our 2025 incident review, the routine maintenance activity described in Section 2, and the recommendations arising from the specialist audits undertaken by Oracle Environmental Experts (OEE).

Many of the measures implemented during the year targeted the same root causes identified in Section 1, particularly **age-related pipe deterioration** and **localised corrosion**. Other activities focused on enhancing monitoring capability, strengthening operational procedures and ensuring staff had the tools and training required to manage pollution risks effectively.

To support this work, Portsmouth Water finalised updated pollution-prevention guidance, incident management procedures and supporting documents with OEE. These provide clearer, more consistent instructions for staff across both Water Treatment Works (WTW) and the Water Distribution Network (WDN). In parallel, we introduced a range of practical pollution prevention tools across our WTW sites, including spill kits, clay dammit mats and drain-sealing equipment. Our Production Resilience Team (PRT) also began developing enhanced training materials, including toolbox talks on incident management, to support consistent understanding and response across operational teams.

## Figure 2: Spill kit, drain seal and clay dammit mat.



Alongside these measures, Portsmouth Water continued to collaborate with the Environment Agency through regular quarterly engagement with local officers, ensuring shared awareness of regulatory expectations and local environmental conditions.

We also continued to work collaboratively with other water companies by attending and contributing to technical-group meetings, sharing knowledge and discussing current and emerging challenges across a range of disciplines. This included participation in the following working groups:

- Water Company PFAS Catchment Working Group
- Water Company Catchment and DWSP Working Group
- UKWIR CIP4 – Biosolids and Groundwater Project
- UKWIR – Potential Impact of PFAS in Biosolids upon Agricultural Crops
- Water Company Nutrient Group
- External farmer catchment and cluster groups

The tables that follow summarise the planned measures for 2026 across each part of our clean water system. These include targeted asset improvements, enhanced monitoring and control, operational training and cross-asset governance updates. Each measure has been designed to support our prevention-first approach and to maintain Portsmouth Water's strong record of low pollution-incident numbers.

## 3.1 Water Treatment Works (WTW) – Planned Measures 2026

During 2026, Portsmouth Water delivered a coordinated programme of improvements at Water Treatment Works to enhance pollution-prevention controls and support ongoing compliance with environmental requirements. These actions were informed by the findings of the 2025 OEE audits and reflected our commitment to maintaining safe, resilient treatment processes across all sites.

A key area of work was the implementation of updated guidance and procedures developed with OEE. These documents provide clearer instructions on pollution-prevention, fuel and chemical management, run-to-waste compliance and incident response. Once finalised, they were embedded into our document management system and incorporated into staff training from **1 April 2026**, ensuring greater consistency across WTW operations.

In addition to procedural improvements, we progressed the drainage-upgrade programme initiated through the 2025 audits, prioritising sites where containment or drainage pathways required enhancement. These upgrades help reduce the risk of uncontrolled releases and strengthen environmental protection at key abstraction and treatment locations.

Further measures included strengthened run-to-waste controls, targeted maintenance of critical WTW assets and updated staff training to embed the new guidance. Collectively, these activities helped maintain Portsmouth Water's strong record of zero pollution incidents at Water Treatment Works.

We also progressed work arising from updated hydrocarbon risk assessments, including the implementation of additional pollution-prevention controls at abstraction sites. As part of this work, we initiated a prioritised programme to replace higher-risk diesel tanks, supporting improved containment and reducing hydrocarbon-related risk.

## Table 3a: Planned WDN Measures for 2026

| MEASURE | DESCRIPTION OF ACTIONS | SCALE OF ACTIONS | EXPECTED IMPACT (CAT 1–3 INCIDENTS PREVENTED PER YEAR OR EFFECTIVENESS RATING) | ROOT CAUSES ADDRESSED | IMPLEMENTATION COMPLETION DATE | DELIVERY STATUS |
|---|---|---|---|---|---|---|
| Implementation of OEE audit actions | Delivery of actions arising from 2025 OEE audits where cost-beneficial to do so | All actions identified from 2025 OEE audits where cost-beneficial to do so | 0 | Inadequate maintenance and management system failure | December 2026 | Planned |
| Diesel tank replacement programme | Prioritisation and planned replacement of diesel tanks identified as higher risk during 2025 assessments to reduce Hydrocarbon Pollution Risk | All diesel tanks identified as higher risk during 2025 assessments to reduce Hydrocarbon Pollution Risk | 0 | Asset Deterioration | December 2026 | Planned |
| Additional hydrocarbon controls | Implementation of new controls identified in updated risk assessments and OEE audit recommendations to reduce Hydrocarbon related pollution risks | All new controls identified in updated risk assessments and OEE audit recommendations to reduce Hydrocarbon related pollution risks | 0 | Management system failure | December 2026 | Planned |
| Preventative maintenance | Targeted maintenance of critical WTW assets | Maintenance on all critical WTW Assets | 0 | Inadequate maintenance | December 2026 | Planned |

## 3.2 Water Distribution Network (WDN) – Planned Measures 2026

In 2026, Portsmouth Water strengthened pollution-prevention measures across the Water Distribution Network, focusing on the factors that contributed to the two minor incidents recorded in 2025—specifically **age-related pipe deterioration** and **localised corrosion**. The measures delivered were designed to reduce the likelihood of bursts, improve system stability and enhance early detection of potential risks.

Key activities during the year included **targeted mains renewal, enhanced pressure management** and **expanded network monitoring**. Building on operational insight gained during 2025, these improvements reduced stress on older mains, increased the reliability of pressure zones and provided better visibility of network performance during high-risk weather conditions.

Operational training was also strengthened during 2026, giving Network teams clearer, more consistent guidance on pollution prevention, burst response and incident escalation. This training was aligned with the updated procedures finalised with OEE, supporting a more coherent incident management approach across the network.

Further prioritised actions during the year were informed by operational insight and network performance monitoring, helping identify areas where additional resilience could be gained. Together, these measures contributed to a more stable distribution system and supported Portsmouth Water's ongoing record of exceptionally low pollution incident numbers.

## Table 3b: Planned WTW Measures for 2026

| MEASURE | DESCRIPTION OF ACTIONS | SCALE OF ACTIONS | EXPECTED IMPACT (CAT 1–3 INCIDENTS PREVENTED PER YEAR OR EFFECTIVENESS RATING) | ROOT CAUSES ADDRESSED | IMPLEMENTATION COMPLETION DATE | DELIVERY STATUS |
|---|---|---|---|---|---|---|
| PRV optimisation and pressure management | Further optimisation of PRVs and pressure zones | Optimisation of all PRVs on our network across 70 pressure zones | 0 | Asset Deterioration | December 2026 | Planned |
| Enhanced network monitoring | Additional loggers, flow/pressure monitors, telemetry | To ensure full coverage of flows and pressures across over 3,000km of network | 0 | Asset Deterioration | December 2026 | Planned |
| Proactive cleaning and maintenance | Leak detection sweeps, targeted repairs | Active Leakage Control across the entire network to meet regulatory targets. Targeted repairs based on impact to customers and environment | 0 | Asset Deterioration | December 2026 | Ongoing |
| Mains renewal and rehabilitation | Renewal of mains with high risk of failure risk mains risk mains risk mains | 10.4km of mains renewed in the financial year 2026-27. Targeted to reduce bursts across the network based on risk of failure and subsequent impact to customers and environment | 0 | Asset Deterioration | December 2026 | Ongoing |


## 3.3 Across Asset Base – Planned Measures for 2026

Alongside the specific measures delivered at Water Treatment Works and across the Water Distribution Network, Portsmouth Water implemented several **cross-asset improvements** in 2026 to strengthen pollution prevention controls across the entire business. These activities focused on governance, procedures, monitoring and organisational learning—the foundations of effective pollution risk management.

A key area of work was the **finalisation of updated pollution prevention and incident management guidance**, developed with OEE. These Priority Documents provide clearer instructions for staff and support greater consistency in how pollution risks are managed across operational teams. Once finalised, they were embedded into the company's document management system and incorporated into training from **1 April 2026**.

In addition, we strengthened our root-**cause analysis (RCA) processes,** improving documentation standards, enhancing the capture of operational insight and establishing a clearer link between incident findings and future actions. Updates to the company's Pollution Risk Register supported this work by ensuring that emerging risks were identified and addressed promptly.

Ongoing monitoring and reporting remained central to our prevention-first approach. Throughout 2026, we continued **quarterly tracking** of performance, delivery of measures and pollution-risk trends, providing strong visibility across teams and helping prepare the company's first statutory Implementation Report, due in 2027.

Together, these cross-asset measures strengthened organisational learning, enhanced governance and helped maintain Portsmouth Water's strong record of low pollution-incident numbers.

### Table 3c: Cross Asset Measures for 2026 Asset Measures for 2026

| MEASURE | DESCRIPTION OF ACTIONS | SCOPE | EXPECTED IMPACT (CAT 1–3 INCIDENTS PREVENTED PER YEAR OR EFFECTIVENESS RATING) | ROOT CAUSES ADDRESSED | IMPLEMENTATION COMPLETION DATE | DELIVERY STATUS |
|---|---|---|---|---|---|---|
| Pollution Risk Register updates | Quarterly updates reflecting new risks and completed actions | Monitoring of all 2026 improvement measures and quarterly reporting through Portsmouth Water's internal governance processes | 0 | Management system failure | Quarterly | Ongoing |
| Performance monitoring & reporting | Quarterly tracking of PIRP delivery | Monitoring of all 2026 improvement measures and quarterly reporting through Portsmouth Water's internal governance processes | 0 | Management system failure | Quarterly | Ongoing |
| Operational training | Pollution prevention, incident response, Root Cause Analysis training | Comprehensive refresher training to all operational staff | 0 | Management system failure | Quarterly | Planned |

### 3.4 Next Steps

The planned measures for 2026 have been summarised in the tables above. Final values for scale, expected impact and implementation dates will be updated once the full 2025 performance dataset and supporting operational information are confirmed. These updates will ensure that the measures included in this PIRP remain accurate, deliverable and aligned with Portsmouth Water's pollution reduction objectives.

APPENDIX A

# DEFINITIONS, TECHNICAL TERMS AND SUPPORTING INFORMATION

This appendix provides clear definitions and supporting explanations for key terms, regulatory categories and operational concepts referenced throughout the Pollution Incident Reduction Plan. It is intended to support transparency, ensure consistent interpretation, and complement Portsmouth Water's internal glossary and compliance documentation.

## A1. Pollution Incident Categories (Environment Agency Definitions)

**Category 1 – Major impact**
A pollution incident causing significant, widespread or long lasting environmental harm. Requires immediate regulatory intervention.

**Category 2 – Significant impact**
A pollution incident with a notable environmental impact that requires regulatory intervention. Impacts are typically localised but still material.

**Category 3 – Minor or minimal impact**
A low-level, short-term or localised environmental impact. Incidents are usually contained quickly and do not result in lasting harm.

**Category 4 – No impact**
An event reported to the regulator that, following investigation, is confirmed to have caused no environmental harm.

## A2. Compliance Risk Index (CRI)

A regulatory measure used by the Drinking-Water Inspectorate (DWI) to assess the risk posed by drinking-water compliance failures. The CRI reflects:

- the severity of any non-compliance
- the number of consumers affected
- the duration of the event
- the company's response and mitigation

A lower CRI score indicates stronger compliance performance.

## A3. Pressure Reducing Valves (PRVs)

Operational assets used to:

- manage pressure within the water distribution network
- reduce pressure transients
- minimise the risk of bursts and uncontrolled discharges
- protect ageing or vulnerable mains

PRV optimisation helps reduce pollution risk associated with pipe failure below ground and control-measure performance.

## A4. Pollution Risk Register

Portsmouth Water's internal tool for:

- identifying pollution-related risks across all asset types
- assessing likelihood and consequence
- tracking mitigation measures
- informing investment and operational priorities
- supporting compliance with the Water (Special Measures) Act 2025

The register is reviewed regularly and updated following incidents, audits and operational changes.

## A5. Root Cause Categories (as used in Section 1)

The six recognised national PIRP root-cause categories are:

1. Pipe failure below ground
2. Control system failure
3. Control measure failure
4. Accidental spillage
5. Flooding
6. Unauthorised discharge or disposal

These categories align with national PIRP guidance and are used to classify both incidents and preventative measures.

## A6. Glossary of Key Terms

**Asset Base** – The full set of operational assets used to abstract, treat, store and distribute drinking water.

**Run-to-Waste** – A controlled discharge of clean water (e.g. during borehole start-up or post-maintenance flushing) to ensure water quality before returning an asset to supply.

**Soil Moisture Deficit (SMD)** – A measure of how dry the soil is. High SMD during hot, dry weather can cause ground movement, increasing the risk of pipe bursts.

**Operational GHG** – Greenhouse gas emissions associated with operational activities, including energy use and chemical consumption.

**SPZ1** – Source Protection Zone 1, the area closest to a groundwater abstraction point where water is most vulnerable to contamination.

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