

**IN THE MATTER OF THE WATER RESOURCES ACT 1991**

**AND**

**CALL IN OF AN APPLICATION BY THE ENVIRONMENT AGENCY TO RENEW ITS  
ABSTRACTION LICENCE RELATING TO THE CANDOVER SCHEME**

**SITE: PRESTON CANDOVER, HAMPSHIRE**

**PLANNING INSPECTORATE REFERENCE: RSA/WR/00016**

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**UPDATE SUMMARY STATEMENT OF TIM SYKES FOR THE CANDOVER  
SCHEME**

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1. This update statement has been prepared in response to instructions to the EA recorded in the Inspector's Inquiry Note (Ref ID19) dated 21 March 2018. In that document the Inspector states: *"it will be necessary for the Agency to set out in evidence their assessment approach to all three cases, and in particular their responses to the s52 consultations, including, but not limited to, the matters raised above as well as matters relating to the proposed Hand off Flows and the continuing need for abstraction at Candover."* To address this instruction, this statement covers the following matters:
  - a. How the Agency formulated its licence change proposals;
  - b. How third parties were involved in the process before the application was made;
  - c. How the Agency had regard to representations;
  - d. Whether there are any outstanding issues raised by third parties which they may feel were not addressed by the Agency
2. My purpose in this update summary statement is to provide the Inspector with the information he has requested and to take the opportunity to distil relevant parts of the history of these licence changes which have already been set out in the Agency's proofs. This will ensure that the Inspector has in this one document a consolidated account of how matters have progressed to the present point. This document should be read in conjunction with my other summary statement on the Itchen and Alison Matthews's statements on the Testwood licence changes. Collectively these three statements provide a consolidated outline of the Agency's final case to the Secretary of State in light of recent developments.

### How the Agency formulated its licence change proposals

3. Section 3 and 6 of the Agency's Candover Statement of Case (Ref SC2, Bundle pp 38 – 44 & 50 – 67) explains the process for licence changes made in 2015, and the proposals made in 2016.
4. The Agency conducted a review of the licence under the Habitats Directive 92/43/EEC (as transposed by the Conservation of Habitats and Species Regulations 2017) (Ref CD13.1 – 13.5 & CD16, Bundle pp 5232 – 5241 & 5278 – 5335). Some general points about this assessment are:
  - The Appropriate Assessment in 2005 (Ref SC2.4, Bundle pp 173 – 398) concluded that it could not be shown that there was no adverse effect both alone and in combination on the chalkstream habitat, White-Clawed Crayfish, Southern Damselfly and Atlantic Salmon populations and their supporting habitats.
  - The Agency set out its proposed licence changes in its Site Action Plan 2007 (Ref SC2.5, Bundle pp 399 – 468). These changes were deemed necessary in order to remove the risks of adverse effect to the River Itchen SAC.
5. The licence changes proposed in the Site Action Plan were as follows (Ref SC2.5, Bundle pp 457):
  - Condition restricting use to times when flows on the Itchen falls to 198 MI/d as measured at Allbrook and Highbridge;
  - Restrict daily abstraction to 20 MI/d between May and August; and
  - Requirement for the scheme to be slowly ramped up and down.
6. In 2011 there was some test pumping which enabled further understanding of risks of using the scheme – particularly in relation to White-clawed crayfish (Ref SC2.7, Bundle pp 477 – 484).
7. The Candover licence was modified in December 2015 in line with requirements in the South East River Basin Management Plan. This specified that protection of Protected Areas was required to be implemented by 22 December 2015. Following further discussion with Natural England (“**NE**”) and the Hampshire and Isle of Wight Wildlife Trust (“**HIWWT**”), and in the light of new evidence from the 2011 testing, further modifications were included beyond those listed in the Site Action Plan as shown in the table on page 13 of the EA's Statement of Case (Ref SC2,

Bundle pp 41). The main additional change was to reduce the licence from a daily rate of 36 MI/d to 27 MI/d and to reduce the annual limit from 5,000 MI to 3,750 MI.

8. It was recognised at that time that further licence changes would be made in 2016 to address concerns raised by third parties, including NE in relation to impacts on SSSI habitats and species and local priority habitats and species, as well as possible impacts on adjacent watercourses – none of which needed to be addressed as part of the Review of Consents (“**RoC**”). A note was produced by the Agency to explain this and was circulated to NE, Southern Water Services (“**SWS**”) and others in July 2015 (Ref SC2.6, Bundle pp 469 – 476). No representations were received in relation to the EA’s licence changes in 2015, although Natural England noted that they expected to see further changes in 2016.
9. In 2016, the EA carried out further work to assess the potential impact of the Candover Scheme on a range of designated and non-designated habitats. The Agency took advice from Natural England and Hampshire & IOW Wildlife Trust who have expertise in protecting the native White-clawed crayfish. In 2016, during the Agency’s licence review process, a significant long-standing abstraction licence in the Candover catchment was revoked which changed the previous assessment of the in-combination impact of abstractions on the Candover Stream (see paragraphs 50 and 51 of the Agency’s Candover Statement of Case - Ref SC2, Bundle pp 52 – 53). Natural England have also raised concern about compliance of the Candover Scheme with the revised Common Standards Monitoring Guidance for rivers (“**CSMG**”) (Ref SWCD11.12, Bundle pp 8532 – 8555) flow targets and also identified potential risks to wetland habitats in the Candover Valley.
10. Following pre-consultation with a range of local and statutory stakeholders (as described below) the Agency considered revoking the licence or renewing it on reduced terms. The Agency chose to renew the licence until 2022 on reduced terms as it was felt that the potential environmental impacts were acceptably small over the short-term. Retaining the scheme gave the Agency the ability to potentially use it to support White-clawed crayfish and the chalk stream habitat whilst the in-combination impact of abstractions was being investigated and a sustainable solution secured. The Agency agreed with Natural England that the licence cannot be used without the explicit agreement of both parties. The Agency has agreed to work with Natural England to define a revised target flow regime for the River Itchen by 2021, and so the time limit of 2022 was chosen to allow review of the Candover Scheme shortly after that work has been completed.

11. One of the most significant concerns with the Agency's Candover Scheme is that the existing discharge point is immediately upstream of a vulnerable population of native White-clawed crayfish, and they are vulnerable to sudden and unseasonal changes in water flow and temperature. There was also the risk that this could happen in successive or repeated years giving no potential for recovery in relation to any impacts.

12. In summary, the proposed licence changes were:

- Reduction in the magnitude of abstraction to a daily rate of 5 MI/d to be used over a 5-month period, giving an annual volume of 750 MI/year.
- Following use of the scheme, it cannot be used again until flows in the Candover stream have recovered to "normal" for at least 22 months in any consecutive 24-month period. Following that period, the scheme cannot be used for a fixed 4-year period, irrespective of flow variability and conditions.
- Addition of another ecological sampling point at Abbotstone.
- A time limit of 31 December 2022.

Further details of the changes can be found at paragraphs 65 and 66 of the Agency's Candover Statement of Case (Ref SC2, Bundle pp 58 – 60).

13. The Agency arrived at the reduced daily rate of 5 MI/d by setting the daily rate to ensure that median summer flows are never exceeded by use of the scheme and then reduced the annual rate to reflect use of the scheme over 5 months. The Agency also proposed a condition to restrict frequency of use of the scheme. This reduction in abstraction and control over the frequency of use ensures that white-clawed crayfish are not exposed to sudden changes in flow and temperature, and also provided certainty that wetland SSSIs would be unaffected by use of the scheme and that impacts would not spread to adjacent watercourses.

14. The Agency added an additional ecological monitoring point to consider risks associated with the non-Special Area of Conservation designated part of the Candover Stream.

15. The Agency carried out an Appropriate Assessment of its proposed varied licence and presented all of its technical work in three reports (Part 1 – hydrological report, Part 2 – ecological report, and a Final Report which pulled all the information together (Refs SC2.16, SC2.17 & SC2.18, Bundle pp 673 – 960)). The Appropriate Assessment (SC2.19, Bundle pp 961 – 1052) notes that use of the Candover Scheme is not without risk to the White-clawed crayfish, but judged that any risks

would be short-term without population-scale impacts or long-term damage because of the licence conditions and the time-limit on the licence. Natural England and Hampshire & IOW Wildlife Trust agree with this conclusion.

#### How third parties were involved in the process before the application was made

16. Southern Water established a Technical Working Group (“**TWG**”) in 2015 to understand if the Candover Scheme could form part of their long-term planning. That group initially involved the Agency, Southern Water, Natural England, the World Wildlife Fund UK (“**WWF UK**”) and Hampshire & IOW Wildlife Trust. The group met again in 2016 when it was expanded to include local stakeholders, including the Baring Family and Upper Itchen Initiative.
17. A range of technical evidence was shared with the TWG in 2015 and 2016 to explain the potential impacts of using the Candover Scheme, and there was opportunity for those groups to comment on Southern Water’s proposals for the scheme and the Agency’s proposals for licence renewal at the meeting on 27 June 2016.
18. The Agency worked with Natural England and Hampshire & IOW Wildlife Trust between February and July 2016 to scope and carry out the EA’s assessment. NE provided pre-application advice on 14 July 2016 raising concerns about impacts on valley wetlands (Ref SC2.15a, Bundle pp 643 – 648).
19. Whilst formulating its final proposal for the licence renewal, the Agency circulated drafts of its technical documents to 23 local individuals and organisations on 22 June 2016. Responses to those documents were received from Southern Water, the Upper Itchen Initiative, Hampshire & IOW Wildlife Trust and Salmon and Trout Conservation UK (Refs SC2.15b – SC2.15f, Bundle pp 649 – 672). The Agency also presented its proposals to the Upper Itchen Initiative at a meeting in July 2017. At that point, some stakeholders were still concerned about possible impacts of the use of the scheme. They were informed that the Agency would finalise its proposals and submit an application at which point the stakeholders would be able to make formal representations.
20. Following this pre-application consultation with local stakeholders and Natural England, the Agency decided to apply to renew the Candover Scheme licence on significantly reduced terms to ensure that potential impacts were minimised whilst still giving the flexibility to use the scheme in the short term if needed under the new very constraining conditions. The change in the Agency’s position between the pre-application consultation and the final consultation were based upon further consideration of the ecological risks, the feedback received, and the fact that the Agency own the licence. Revised technical documents were drafted to reflect this

shift in approach and the application was submitted on 22<sup>nd</sup> July 2016 (Ref SC2.26a to SC2.26c, Bundle pp 1117 - 1134).

21. Natural England were formally consulted using Appendix 3 and 11 (these are standard forms by which the Agency formally consult NE – they are an audit trail) (Refs SC2.21a and SC2.21b, Bundle pp 1071 – 1106) and concluded that they supported the proposals subject to the addition of two further conditions to the licence (Ref SC2.22, Bundle pp 1107 – 1108).

#### How the Agency had regard to representations

22. The Agency's determination report (Ref SC2.2, Bundle 99 - 170) forms the formal record of how the representations were considered in the determination process. In addition to that document, the Agency drafted an internal document to record comments on all representations.

23. A decision statement is usually published on the internet for people to see how their representation informed the process. This cannot happen until the Secretary of State makes a final decision. All representors received a standard letter to acknowledge receipt of their representation.

24. The application was advertised in the Hampshire Chronicle on 27 October 2016 with a closing date of 24 November 2016:

- 19 representations were received – all of which were in general supportive apart from the representation from Southern Water (Refs SC2.27, SC2.27 1a to SC2.27 19b, Bundle pp 1135 – 1317).
- Organisations responding included Natural England, the Upper Itchen Initiative, Test & Itchen Association, Salmon and Trout Conservation UK, Hampshire & IOW Wildlife Trust, WWF, the Wild Trout Trust and the Piscatorial Society. The table summarising the responses to the representations is taken from section 5.1 of the EA's determination report (Ref SC2.2, Bundle pp 113 – 118) and is included as Annex 1.

25. After considering representations and replying to Southern Water, the Agency notified the Secretary of State that it wished to proceed with its proposals on 22 December 2016 (Ref SC2.29a and SC2.29b, Bundle pp 1324 - 1325).

Are there any outstanding issues raised by third parties which they may feel were not addressed by the Agency?

26. Most of the third-party representations were very supportive of the Agency's approach to reduce the licence but most would have preferred the scheme to have been decommissioned and the licence revoked. The Agency considered that approach, but decided to retain the scheme whilst the impact of other licences which can potentially adversely affect the Candover Scheme are investigated. This gives the Agency scope to offset the impact of those other abstraction impacts if there is a drought in the period whilst they are being investigated. The licence proposal included only renewing the licence until 2022 at which time the long-term future of it will be decided in the light of an updated target flow regime for the River Itchen.

27. Many representations made overall comments about water resources management, operation of other Southern Water sources, and Southern Water's proposals for the scheme whilst using a new discharge point. These were important but not relevant to the determination of this application; however, the comments have been relevant to the Agency's overall consideration of the other licences subject to this Inquiry.

**DECLARATION**

The evidence that I have prepared and provided for this inquiry in this summary statement is true. I confirm that the opinions expressed are my true and professional opinion.

**Signature:** .....

**Tim Sykes**  
**Solent Fisheries, Biodiversity & Geomorphology Team Leader for Solent and South Downs Area with the EA**

**Dated :** .....

## ANNEX 1

No.	Name / Organisation	For/Against
1	NE	For
<b>Summary</b>	Refers us to their formal response on 06/09/16, which is fully detailed in Section 7.2 below.	
<b>EA Response</b>	See Section 7.2 below.	
2	Individual	<b>For - supports the reduction based on the documentation provided.</b>
<b>Summary</b>	States their opinion that Southern Water needs to find new, sustainable sources of supply rather than abstract from chalk aquifers beneath environmentally designated rivers and this reduction may encourage them to start on this course of action. And, is of the opinion that the EA should cease all PWS abstraction from chalk aquifers within a number of years, which will drive investigation into other water supply options.	
<b>EA Response</b>	Their further opinion and suggestions are beyond the remit of this application to renew (on different terms) and determine the Candover Scheme augmentation licence.	
3	Individual	<b>For - supports the reduction based on the documentation provided.</b>
<b>Summary</b>	States their opinion that Southern Water needs to find new, sustainable sources of supply rather than abstract from chalk aquifers beneath environmentally designated rivers and this reduction may encourage them to start on this course of action. And, is of the opinion that the EA should cease all PWS abstraction from chalk aquifers within a number of years, which will drive investigation into other water supply options.	
<b>EA Response</b>	Their further opinion and suggestions are beyond the remit of this application to renew (on different terms) and determine the Candover Scheme augmentation licence.	
4	The Wild Trout Trust	<b>For - supports the reduction based on the documentation provided.</b>
<b>Summary</b>	States their opinion that abstraction from chalk aquifers to augment surface waters is not sustainable and encourages work to find alternative sources of water so that the Candover Scheme can cease in the foreseeable future.	
<b>EA Response</b>	Any new Candover Scheme augmentation licence will have an expiry date, when it will have to be assessed against prevailing legislation and guidance before being renewed or, potentially, revoked.	
5	Individual	<b>For - supports the reduction based on the documentation provided.</b>
<b>Summary</b>	States that from the information in the EA reports that the current Candover licence could reduce flows in the Stream by up to 47%, which they consider unacceptable, especially regarding the Candover's SSSI and SAC status. Though supporting the reduction, they state that their preferred solution would be the cessation, decommissioning and removal of the scheme and its hardware now, but definitely at	

	the proposed 2022 expiry date. Finally, they suggest that they would consider a legal challenge if the EA backtracked from the proposed licence reductions.	
<b>EA Response</b>	Any new Candover Scheme augmentation licence will have an expiry date, when it will have to be assessed against prevailing legislation and guidance before being renewed or, potentially, revoked.	
<b>6 and 6a</b>	<b>Southern Water</b>	<b>Against</b>
<b>Summary</b>	Southern Water put in a detailed objection consisting of a; <ul style="list-style-type: none"> <li>- Covering letter (undated), including the context of their interest in the scheme, their potential adoption of the scheme, the viability of the scheme in their hands, and a review and comments on the EA's application and its merits.</li> <li>- Technical note (18/11/2016); which assesses the potential impact of the Southern Water's proposal for the Candover Scheme. Technical note (18/11/2016); which assesses the potential impact of the Southern Water's proposal for the Candover Scheme.</li> </ul>	
<b>EA Response</b>	<p>This was a significant and detailed representation. We assessed it and though there were many points, they were based around common themes. We decided to address these themes and drafted a response letter (dated 09/11/2016), which included the following headings;</p> <ul style="list-style-type: none"> <li>• Opening summary,</li> <li>• Southern Water's Candover scheme,</li> <li>• Sustainability of groundwater augmentation schemes,</li> <li>• Environmental assessment – precautionary principle,</li> <li>• Environmental assessment – SSSI wetlands,</li> <li>• Environmental assessment – impact of using scheme in successive years,</li> <li>• Environmental assessment – changes to other licences within the catchment,</li> <li>• Application of Common Standards Monitoring Guidance (CSMG).</li> </ul> <p>This letter is included in its entirety below this table and concludes that we have met our statutory obligations and duties as owner/operator of the Candover Scheme and that our decisions regarding the proposed licence are evidence based.</p> <p>We gave Southern Water until 16/12/2016 to respond, which they did on 15/12/2016. In their letter they noted our intention to proceed with the proposal unchanged. Restated their view that there is a strong case for their plans for the Candover Scheme, including on grounds of environmental impact and sustainability. And that they will await the decision of the Secretary of State on our licence renewal as proposed.</p>	
<b>7</b>	<b>Individual</b>	<b>For - supports the reduction.</b>
<b>Summary</b>	Suggests that Southern Water, ultimately, needs to find new, sustainable sources of water, other than from chalk aquifers beneath environmentally designated rivers.	
<b>EA Response</b>	Their further opinion is beyond the remit of this application to renew (on different terms) and determine the Candover Scheme augmentation licence.	
<b>8 and 8a</b>	<b>Individual</b>	<b>For - supports the reduction (following clarification from the EA.)</b>
<b>Summary</b>	Initially opposed the application stating that, '...abstracting yet more water out of chalk aquifers is [not] a viable long term solution...' <p><i>The individual was written too, including a copy of the advert, explaining that it was an application to reduce the current licence etc.</i></p>	

	In response, they stated support for the reduction, but suggested the long term plan should be to decommission the scheme to protect the chalk aquifer from any such augmentation schemes.	
<b>EA Response</b>	Any new Candover Scheme augmentation licence will have an expiry date, when it will have to be assessed against prevailing legislation and guidance before being renewed or, potentially, revoked.	
<b>9</b>	<b>Upper Itchen Initiative</b>	<b>For - supports the reduction, based on various referenced evidence.</b>
<b>Summary</b>	They suggest the longer term view should be that the licence is not renewed and the scheme is decommissioning, with the removal of its hardware etc. The representation then goes on to suggest that NE's Common Standards Monitoring Guidance (CSMG) should be met on the Candover within the life of the licence. A discussion on the appropriate Hands-off Flows for invertebrates and macrophytes. Support for committing to work with Nature England on bespoke flow targets for the River Itchen SSSI and SAC by 2021. And, a view that a tougher approach is required on Water Companies to find more sustainable sources of supply, including much more co-operation with each other.	
<b>EA Response</b>	Any new Candover Scheme augmentation licence will have an expiry date, when it will have to be assessed against prevailing legislation and guidance before being renewed or, potentially, revoked. As they note, we have agreed to work with NE on bespoke River Itchen flow targets (including, or at least considering, CSMG) within the life of any issued Candover licence.  Their further opinion on Water Companies is beyond the remit of this application to renew (on different terms) and determine the Candover Scheme augmentation licence.	
<b>10</b>	<b>Individual</b>	<b>For - supports the reduction.</b>
<b>Summary</b>	Is disappointed with the manner in which water resources is planned and managed for the Itchen and Test River Basins. Suggests the EA should do more to protect the Itchen through broader water resources planning and management, especially regarding the water companies. Suggests that the Itchen basin needs water bought into it from outside the catchment, not more abstracted from it as proposed by Southern Water. Suggests Southern Water progresses Havant Thicket Reservoir to supply its needs and that the EA should be more pro-active regarding this matter.	
<b>EA Response</b>	Their further opinion is beyond the remit of this application to renew (on different terms) and determine the Candover Scheme augmentation licence.	
<b>11</b>	<b>Individual</b>	<b>For – supports the reduction.</b>
<b>Summary</b>	Appears to agree that some augmentation support of the Candover Stream is necessary. Also suggests Southern Water will find other sustainable sources because of this reduction?	
<b>EA Response</b>	Their further opinion is beyond the remit of this application to renew (on different terms) and determine the Candover Scheme augmentation licence.	
<b>12</b>	<b>Salmon &amp; Trout Conservation UK</b>	<b>For - supports the reduction.</b>

<b>Summary</b>	Suggests abstraction from the chalk to augment the Candover Stream is not sustainable, or that the ecological effects from increased groundwater abstraction are fully understood. They encourage work on alternatives e.g. smart tariffs, demand management etc. to replace 'deployable output' from this scheme so it can then be decommissioned.	
<b>EA Response</b>	Their further opinion on 'alternatives' appears to be beyond the remit of this application to renew (on different terms) and determine the Candover Scheme augmentation licence. (The opinion around 'smart tariffs and demand management' is word for word what WWF-UK said and was specifically aimed at Southern Water in their representation?) Any new Candover Scheme augmentation licence will have an expiry date, when it will have to be assessed against prevailing legislation and guidance before being renewed or, potentially, revoked.	
<b>13</b>	<b>The Test &amp; Itchen Association</b>	<b>For - supports the reduction based on the documentation provided.</b>
<b>Summary</b>	Agrees with the EA assessment that the proposed licence will provide more 'natural' flows if ever used. Suggests the Itchen is over-abstracted due to, principally, PWS abstraction. Suggests the proposed reduction and restricted re-use will impact Otterbourne PWS abstraction and may press the Water Company(s) to adopt sustainable levels of groundwater abstraction. Suggests wider licensing measures/policy that the EA could impose to further drive this. Recognises that the impact from the revocation of the Fobdown licence is not fully understood. Encourages the EA to review the Totford PWS abstraction.	
<b>EA Response</b>	Their further opinion on 'PWS etc.' is beyond the remit of this application to renew (on different terms) and determine the Candover Scheme augmentation licence.	
<b>14</b>	<b>Individual</b>	<b>For - supports the reduction.</b>
<b>Summary</b>	Further, agrees with the comments made by Salmon & Trout Conservation UK, in 12 above.	
<b>EA Response</b>	N/A	
<b>15</b>	<b>World Wildlife Fund UK</b>	<b>For – supports the reduction based on the documentation provided.</b>
<b>Summary</b>	<p>The WWF-UK put in a detailed representation consisting of a;</p> <ul style="list-style-type: none"> <li>• Candover application covering letter (10/11/2016), with general conclusions,</li> <li>• Candover augmentation scheme: WWF-UK position statement (26/05/2015),</li> <li>• Understanding environmental flow requirements for salmon on the River Test: a discussion paper (March 2015), 17</li> </ul> <ul style="list-style-type: none"> <li>• An assessment of invertebrate-based target flows for the River Itchen, Hampshire (29/11/2009),</li> <li>• Testwood application covering letter (10/11/2016), with general conclusions.</li> </ul> <p>From the Candover covering letter; they state their previous concerns that abstracting chalk stream headwater at times of very low flow to support downstream abstraction is unsustainable in principle. They state their 'acceptance criteria' for any Candover augmentation licence, especially adherence to not breaching WFD and Habitats Directive (HD) standards for the Itchen SAC. In this regard, they support the proposed licence reduction as a step forward. They state that as the scheme has not been used for some years,</p>	

	<p>any use would represent an increase over historic levels and may, therefore, contribute to a breach of WFD and HD requirements? Their preference would be for the EA to decommission the scheme, reduce abstraction to zero and donate the land to Hampshire Wildlife Trust.</p> <p>They consider we have used the 'precautionary principle' from the Habitats Directive in relation to the conditions in the proposed licence. And suggest any argument that the changes are too precautionary would contravene the requirements of HD.</p> <p>They note that the Candover is failing WFD and SSSI targets, though mainly due to water quality issues, and that the Itchen SAC is at Poor status for flow. They state that it is important that the EA does not allow increased abstraction, above historic levels, to avoid deterioration of HD.</p> <p>They consider that Southern Water could offset the loss of Candover augmentation water through smart tariffs and demand management measures.</p>	
<b>EA Response</b>	<p>Any new Candover Scheme augmentation licence will have an expiry date, when it will have to be assessed against prevailing legislation and guidance before being renewed or, potentially, revoked.</p> <p>Their further opinion on disposal of EA assets, smart tariffs etc., and the Testwood application are beyond the remit of this application to renew (on different terms) and determine the Candover Scheme augmentation licence.</p> <p>Any new or varied licence applying for additional water will be assessed, determined and issued/refused following the prevailing legislation and guidance.</p>	
<b>16</b>	<b>Hampshire &amp; Isle of Wight Wildlife Trust</b>	<b>For – supports the reduction based on the documentation provided.</b>
<b>Summary</b>	<p>State they provided extensive comments in the drafting of the EA's Technical Reports and Appropriate Assessment in July 2016. They lay out the background of the likely impact of the current licence and highlight their specific concerns. They then review our Appropriate Assessment and Technical Reports in line with the proposed licence conditions. Their concluding remarks noted that the EA had appeared to listen to stakeholder concerns and add further protection within the proposed licence to prevent chronic impact on the ecology of the Candover Stream and on the wider biodiversity and sustainability of surrounding watercourses. They support the recommendation in the Appropriate Assessment that larger, extant licences should be subject to the tests of Section 61 of the Habitat Regulations. They conclude with a comment that they would like to have the opportunity to comment further if the licence is ever sold or transferred to Southern Water.</p>	
<b>EA Response</b>	<p>The adoption, or otherwise, of the recommendation in the Appropriate Assessment that larger, extant licences should be subject to the tests of Section 61 of the Habitat Regulations is beyond the remit of this application to renew (on</p>	
<b>17</b>	<b>Individual</b> (No further comment.)	<b>For - supports the reduction.</b>
<b>EA Response</b>	N/A	
<b>18</b>	<b>Individual</b>	<b>For - supports the reduction.</b>
<b>Summary</b>	<p>Suggests that under the current licence, summer abstraction at the full rate would quickly reduce the Candover Stream to a trickle. Believes the Southern Water proposal for using the scheme (if they had control of it) would reduce the flow in</p>	

	drought conditions by approx. 25% and that is unacceptable. It would also affect local water meadow habitat (part of which are designated SSSI and SAC) by lowering summer water tables.	
<b>EA Response</b>	Their further opinion regarding Southern Water's use of the scheme is beyond the remit of this application to renew (on different terms) and determine the Candover Scheme augmentation licence.	
<b>19</b>	<b>Individual</b>	<b>For (received out of time) - supports the reduction</b>
<b>Summary</b>	Suggests this may encourage Southern Water to find new, less environmentally damaging sources of supply.	
<b>EA Response</b>	Their further opinion is beyond the remit of this application to renew (on different terms) and determine the Candover Scheme augmentation licence.	