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Working locally and nationally for a beautiful and living countryside.

Itchen Testwood and Candover Abstraction Inquiry

Thank you for the opportunity of responding with our broad position at this stage of the Public Inquiry into the proposed abstractions by Southern Water from the Itchen, Candover and Test rivers.

CPRE Hampshire

I am writing on behalf of The Campaign for the Protection of Rural England, the Hampshire Branch (CPREH) of this nationally important charity (CPRE). We campaign to support sustainable development of the countryside. The Branch set up a water Focus Group in 2012, developed a 5 point water policy and has been monitoring water companies, the EA and conservation groups since then with a view to protecting the iconic chalk streams and their catchments. We have 1,895 members. The Policy and Planning Group has approved this response but it may not reflect the view of every member.

Hampshire lies in the South East area of acute water stress (WRSE) and we promote holistic catchment-based approaches in the face of increasing development and water consumption, climate change, the predicted increase in drought frequency and the high ecological status and fragility of the iconic chalk streams which contribute so much to our economy and to society.

Our position on the Agreement

Our stance is that water companies must cease their reliance on Hampshire's rivers and their contributory aquifers and find other sources of supply now before irreparable damage is caused. Linking the rivers to enable supply as proposed is not acceptable in our view

We broadly welcome the agreement between Southern Water Services (SWS) and the Environment Agency (EA) as set out in the Draft Agreement circulated on 13th March on the first day of the Inquiry. We support the response of the Rule 6 contributors that separating the daily abstraction licences from those needed in the event of drought is a satisfactory outcome and should protect the biodiversity remaining in our chalk streams under normal circumstances. We supported the EA's move to lower abstraction levels from all three rivers. The amounts requested by SW were incompatible with the sustainable future (biologically, socially and economically) of the already severely compromised rivers.

Like Natural England we:

“would prefer an even more precautionary approach..... based on the need to return them, (*the rivers*) as far as ever possible, to their natural state.” Introduction 3

Water Supply in the South East

There remains the issue of other sources of supply. CPREH has been a stakeholder for SWS for many years and none of the long term capital intensive supply schemes for Hampshire in SWS' WRMP have come on stream. This Inquiry is of the utmost importance as it is the result of a critical point being reached in water supply in the South East where over reliance on river and aquifer sources is damaging rivers permanently. We submit that other sources must be found. We recognise the costs and investment needed but if SWS is to uphold its Catchment First policy these alternatives need to be actioned now.

Managing drought events.

We support the EA remaining in charge of the sequence, timing and amounts involved but there remain grave concerns.

1 Drought Triggers

a, Drought is likely to happen more frequently as climate change produces increases in rainfall amounts and intensity and increased evapo-transpiration.

b, Demand will increase (despite ongoing demand side reductions) as the government's house building targets are enforced. There is no link between natural capital and planning to control this; a link we have promoted strongly in CPREH response to the government's Freshwater National Planning Statement consultations.

c. supply and demand side reductions (leakage, metering, water conservation in the home) admirable though they are, cannot solve the water supply need in the South East.

In the light of these factors, drought triggers must be rigorously controlled. We are concerned about the findings of Fish Legal that;

a, “SWS's groundwater modelling consistently under-estimated river flows which had the effect of over-estimating the frequency of occurrence of drought conditions, and accordingly the frequency of the measures said to be needed in preparation for droughts.” Issue 1 8.

This has been raised before in relation to ground water triggers (Tom Davis ex Wessex Rivers Trust 2014) and is a key issue.

2 Sequencing of Abstraction

We also support Fish Legal's request for the prioritisation or sequencing of use of water sources to ensure that the most ecologically appropriate sources for abstraction are prioritised in the event of low flows arising. Issue 4 12.

3 Effective Environmental Surveys

We are concerned also that SWS work effectively with the land owners to complete the promised monitoring and environmental investigations.(LRM Ltd concerns). Permission to abstract should not be allowed where inconclusive investigations have been carried out. A precautionary principle should apply.

4 Application ready status

We would respectfully ask the Inspector to insist that permissions for the drought orders and permits and changes to abstraction levels as proposed by EA and SWS are only granted by the EA if other sources of water (not river or local aquifers) as well as temporary use bans (TUBS) have been supplied. This should form part of the application ready status.

5 Longevity of the agreement

It would seem that this agreement only applies for 10 years. Like the Hampshire and Isle of Wight Wildlife Trust (HIWWT) we are concerned that

“ the use of this approach is described throughout as an interim measure, meaning that the rivers remain vulnerable to the use of drought measures for the coming ten years or so ONLY IF other water supplies can be secured during that period. If that fails to happen, the rivers will remain vulnerable past that point “ (email to members 19th March 2018)

We respectfully request that where this is part of the Inquiry ruling, the provision by SWS of alternative sources is prioritised.

Summary

We are very concerned that the supply of water to the south east has reached a critical point where only large scale, long term investment can prevent the destruction of the ecology of the rivers and the drawdown of the aquifers to the point where they will no longer feed the river channels. There are negative social and economic impacts as well as ecological ones. Therefore we broadly welcome the SWS/EA abstraction agreement protecting the rivers under normal circumstances

We welcome EA remaining in control of the abstraction process in the event of drought but hope that powers are included so that EA can insist the provision of alternative sources

of supply as well as Temporary Use Bans (TUBs) before the river/aquifer water's drought permits are granted.

CPREH would ask that a precautionary principle is invoked and where there is doubt about the ecological impact of low flows the decision to abstract under drought conditions should be refused.

Nationally we fear that the planned house building targets and locations are at odds with present and future natural capital availability and government needs to act fast. We are convinced that this Inquiry has national significance and should be brought to Government's notice,

Moya Grove

CPREH Water Focus Group

pp. Christopher Napier

Chair Policy and Planning Group