

Itchen Candover and Testwood Abstraction Inquiry

Thank you for the opportunity of responding to the Public Inquiry into the proposed abstractions by Southern Water from the Itchen, Candover and Test rivers.

I am writing on behalf of The Campaign for the Protection of Rural England, 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.

Therefore our policies are to:

1. Support efficient use of existing resource,
2. Support demand reduction
3. Link planning and water
4. Support agricultural practices to conserve win the catchment
5. Aim to change attitudes

We have been active stakeholders of Southern Water for many years. They have made progress in reducing demand by supply side measures to reduce water use to 133lpd by 2020, by metering (now nearly 90%) and leakage reduction (lowest of all UK companies but still at 100lpd). However, we have had longstanding concerns about SW's approach to water resources which is much too heavily dependent in this area on quantities of groundwater (aquifers) and surface water; this despite their holistic "Catchment First" stance. There has been little effective move to water reuse, storage, desalination or transfers in this most stressed area of iconic chalk streams. The quality of the water in the streams is also now at risk, prejudicing their ecosystems. These streams are under acute pressure as countless studies of fish fly numbers and aquatic fauna show. (www.salmon-trout.org/wp-content/uploads/2017/09/ITCHEN.pdf)

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.

At a recent SW stakeholder meeting (November 2017) it was stated by SW that approaches have been made to South West Water and Wessex Water re transfers for the 2019 WRMP.

An approach to Thames Water (TW) was later withdrawn citing desalination as an alternative. (TW stakeholder meeting). Portsmouth Water also has surpluses.

Against this background we wish to support the measures proposed by the Environment Agency (EA) to protect the Test and Itchen rivers and Candover stream. The EA are carrying out their legal obligation to protect the quantity and quality of the rivers and we wholeheartedly support that.

Proposed Licence changes for Abstraction of surface water from the river Test at Testwood

Licence no 11/42/18.16/546

- Reduce daily quantity from 136.38 Mlpd to 80 Mlpd (annual 29,200 Mlpa)
- Impose hands off level of 355 Mlpd from 91 Mlpd until March 2027
- This to reduce to 265Mlpd at Testwood Bridge (March-December) 233 Mlpd January to February.

We welcome SW's statement (Provisional Statement of Case (PSoC) November 2017 para.13) that they accept the significant reduction imposed. However, since monitoring, data collection and analysis is unlikely to prove beyond doubt that there will be no negative impacts we would urge that a precautionary principle is applied and that the Hands Off Flows stand at 355mlpd as proposed with no special conditions to abstract below that level in place

We believe it is essential that stakeholders are reassured that the Test SSSI is managed in a manner that is ecologically sound to protect its genetically unique salmonid stocks and the supporting biota. It is their statutory duty to provide environmentally sustainable sources. So we also submit that if this water will be needed in droughts anticipated by SW on a 1:20 year pattern then the water supply system is at an acute stage and other reliable sources should be obtained from outside the Resource Management Zone (RMZ) in order to protect the rivers.

We also are concerned that the revisions proposed will form a precedent which will be carried through into future Water Resource Management Plans (WRMPs).

Proposed Licence changes for the Candover stream

Licence no. SO/042/0031/026

Decrease from 3,750mlpa per year to 750 mlpa,

Decrease from 27, mlpd to 5, mlpd

Augmentation to occur, at most, one period in every six years,

To time limit the licence to 31 December 2022

We welcome SW's statement (PSoC para 20) that this is not to be challenged. However, with no flows stipulated in the PSoC (para.20c 21e) and no data on impact available we cannot support SW's proposals. We would not support special conditions to abstract below that level in place

We have been made aware that SW's initial request could create a cone of depression in the aquifer which would extend into the Dever catchment, a tributary of the Test, thus further reducing flows in that river.

Proposed licence changes for the Itchen

Licence nos 11/42/22.6/92, 11/42/22.6/93 and 11/42/22.7/94

The proposal is to vary all three licenses in the following ways:

A total annual aggregate quantity of 42,000 Mlpa (reduction from (approx.)51,000 mlpa

Hands off flows (HoF) at 198 Mlpa measured at Allbrook and Highbridge gauging station

Time limit the licenses to expire on 31 March 2025.

We welcome SW's acceptance of this proposal but again do not support their request for abstraction below the Hands off flow in drought conditions and no special conditions to abstract below that level in place.

We are entirely in support of the EA measures to protect the Itchen SAC under the Water Framework Directive and the Habitats Directive and welcome the imposition for the first time of the hands off flow. This river is fragile, iconic and under severe pressure and supports genetically unique salmonid population and the supporting biota. It deserves even stronger protection than this.

In conclusion.

CPREH is pleased that SW accepts the changes but extremely concerned that they want to link the rivers and abstract below the Hands off Flow Limit in drought conditions in every case.

We submit that this is likely to be ecologically damaging and so it is vital to adopt the precautionary principle.

We do not accept that there are no other sources of supply and are concerned that there is little evidence of progress in securing them.

Moreover, we are further concerned, that if granted, these special conditions will form a precedent and be worked into future WRMPs, obviating the need to find other sources of supply and further degrading the ecological status of the rivers.

Given the high status of the rivers, climatic pressures, rapid development and weak legal enforcement of water saving measures in new builds and crucially the availability of other

sources of water, CPRE feels that the EA must be supported in their statutory duty to sustainably manage these important river catchments. It would appear that rivers and aquifers are no longer sustainable water supply sources in this area, and we have reached a critical point of demand outstripping supply. Rivers must not be casualties. This is a key Public Inquiry at this time.



Moya Grove

CPREH Water Focus Group

Pp

Christopher Napier

Chair. Planning and Policy Group